TPSI Terminals, LLP d/b/a/ TransMontaigne Product Services, Inc.
Tampa Terminal
Facility ID No.: 0570081
Hillsborough County

Title V Air Operation Permit Renewal

PROPOSED Permit No. 0570081-016-AV

Permitting Authority:
Environmental Protection Commission
of Hillsborough County
3629 Queen Palm Drive
Tampa, FL 33619
Telephone: (813) 627-2600
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Title V Air Operation Permit Renewal

PROPOSED Permit No.: 0570081-016-AV

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Permittee:
Dudley Tarlton/TPSI Terminal, LLP
Tampa Terminal
P.O. Box 5660
Denver, CO 80217

PROPOSED Permit No.:0570081-016-AV
Facility ID No.: 0570081
SIC Nos.: 51, 5171
Project: Title V Air Operation Permit Renewal

The purpose of this permit is to renew the Title V Air Operation Permit No. 0570081-015-AV. This existing facility is located at 1523 Port Avenue, Tampa, Hillsborough County; UTM Coordinates: Zone 17, 358.0 km East and 3089.1 km North; Latitude: 27° 55' 15" North and Longitude: 82° 26' 35" West.

This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210 and 62-213. The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:
Appendix I-1, List of Insignificant Emissions Units and/or Activities
APPENDIX TV-6, TITLE V CONDITIONS version dated 06/23/06
APPENDIX SS-1, STACK SAMPLING FACILITIES
Appendix CAM

Effective Date: ARMS Day 55
Renewal Application Due Date**: ***
Expiration Date: January *

Environmental Protection Commission
of Hillsborough County

*To be entered upon final issuance

_____
Richard D. Garrity, Ph.D.
Executive Director

RDG/KRZ/krz

Section I. Facility Information.

Subsection A. Facility Description.

This facility receives petroleum products by marine vessel. The petroleum products are stored in the petroleum storage tanks and re-distributed by loading out to tanker trucks via loading racks, transporting through pipelines, or occasionally loading back out to barges (diesel only). The facility consists of eleven (11) storage tanks (tanks) and one (1) truck loading rack with a total of eight (8) loading bays. There is also a slop tank and petroleum contact water (PCW) tank present at the site.

Volatile organic compound (VOC) emissions from the storage and handling of petroleum products are controlled by the type of roof and selas and by limiting the product throughput and the Reid Vapor Pressures (RVP) values. VOC emissions displaced during truck loading are directed to a knock-out underground tank and routed to the vapor control system, which consists of a primary VCU and a back-up flare. The primary control device is a John Zink Enclosed Flame Hydrocarbon Vapor Combustion Unit (VCU), Model No. ZCT-3-9-50-X-2/8-2/8-X-X with natural gas assist for temperature control capable of controlling VOC emissions at or below 10 milligrams per liter of gasoline loaded. A John Zink Company Series GV-LH forced draft open flame flare serves as the back-up control device and is capable of controlling VOC emissions at or below 35 milligrams per liter of gasoline loaded.

The Tampa Terminal has access to a 10” pipeline for transporting jet fuel and diesel, and a second 16” pipeline for transporting gasoline and ethanol. The pipelines are connected to the Orlando area through the Kinder Morgan facility. The facility also has the capability of loading diesel fuel out to barges, but the activity is considered an insignificant activity due to the relatively low level of emissions generated. Also identified as an insignificant activity is the handling and storing of biodiesel through two biodiesel storage tanks.

TPSI Terminals also blends gasoline with 10% or less of ethanol product. All ethanol products enter the terminal via either marine vessel or tanker truck. The terminal has the capability of receiving either denatured or non-denatured ethanol. Denaturant is combined with non-denatured ethanol prior to storage into the storage tanks. The denaturing process occurs by metering E10 from the truck rack through a line, which has a "T" connection to the cargo line from the marine vessel to the tank. No additional blending skid is required. All ethanol stored at Tampa terminal is denatured. The truck rack loading system has two identical high pressure pumps. The output of these pumps is pressure controlled to deliver a desired pressure and flow rate to the blending skid. The blending skid is located adjacent to the truck loading rack. The blending skid consists of eight (8) SS Oval Gear Tuthill Meters (TS20C) and eight (8) Brodie Digital Control Valves (BV88). Each valve and meter combination, on the skid, is paired with a specific gasoline meter at the truck loading rack. The ethanol is then measured and routed to that specific gasoline line. The ethanol is then injected into the gasoline line serving each of

eight specific meters, at the truck rack. The ethanol enriched gasoline with a maximum of 10% ethanol (E10) is then metered as it is loaded into the truck. This entire system is computer controlled and maintains a very tight tolerance of just under 10% ethanol in all gasoline loaded. If the percentage of ethanol in the gasoline varies, even slightly, the system is designed to go into a state of alarm, which alerts the terminal operators. The entire system is monitored very closely. Inventories are balanced daily. El0 percentages are hand checked daily. Laboratory tests are done routinely. The ethanol blending activity is considered to be an insignificant activity.

Each of the tanks at this facility has been grouped to provide operatonal flexibility. Each tank group emissions are based on the working (throughput) losses from the worst tank in the group using the product with the highest annual average vapor pressure (worst case scenario) in that tank group, and the standing losses from all the tanks in each group. This will enable the facility to store and handle alternate products in the same tank group. Since the gasoline/diesel tank group has separate specified limits for gasoline and diesel, a working loss for each product was included based on the designated throughput limits. A summary of the equipment involved is outlined below:

E.U. ID No.	Brief Description
-001	**Truck Loading Rack T/T**

No.	Transport	Regulation	Control
T/T #1 & #2	Loading Rack	NSPS, Subpart XX	Primary VCU - 10 mg/l
		Rule 62-296.510, F.A.C.	Back-up Flare - 35 mg/l

E.U. ID No.	Brief Description
-002	**Distillate Tank Group**

Tank No.	Roof Type	Vol. (10^3gal.)	Dimension Diameter x Height	Color	Regulation
1	VFR	3276	120 x 40	White	Rule 62-296.320, F.A.C.
2	VFR	2604	120 x 32	White	Rule 62-296.320, F.A.C.

E.U. ID No.	Brief Description
-005	**Gasoline Tank Group**

Tank No.	Roof Type-Primary/Secondary Seal	Volume (10^3gal.)	Dimension Diameter x Height	Color	Regulation
3	IFR - LM/RM	2520	120 x 32	White	Rule 62-296.508, F.A.C.
4	IFR - MS/RM	3192	120 x 40	White	Rule 62-296.508, F.A.C.
5	IFR - LM/RM	3192	120 x 40	White	NSPS, Subpart Kb
6	IFR - MS/RM	1806	90 x 40	White	Rule 62-296.508, F.A.C.
7	IFR - MS/RM	3381	120 x 40	White	NSPS, Subpart Ka
8 (8a)	IFR - MS/RM	6447	140 x 56	White	NSPS, Subpart Kb

9 (9a)	IFR - MS/RM	4738	120 x 56	White	NSPS, Subpart Kb
21 (201)	HFR (Slop Tank)	0.563	4 x 6	White	Rule 62-296.320, F.A.C.

E.U. ID No. Brief Description
-008 Additive Group Tanks

Tank No.	Roof Type	Vol. (x 10^3gal.)	Dimension Diameter x Height	Color	Regulation
20 (101)	HFR	10	8 x 27	White	Rule 62-296.320, F.A.C.

Glossary
IFR - Internal Floating Roof
VFR - Vertical Fixed Roof
HFR - Horizontal Fixed Roof
MS/RM - Mechanical Shoe Primary Seal/Rim-Mounted Secondary Wiper Seal
LM/RM - Liquid-Mounted Primary Seal/Rim-Mounted Secondary Wiper Seal

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

The loading rack is subject to 40 CFR 60, Subpart XX - Standards of Performance for Bulk Gasoline Terminals and Rule 62-296.510, F.A.C. - Bulk Gasoline Terminals. Storage Tank Nos. 5, 8, and 9 are subject to 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels. Storage Tank No. 7 is subject to 40 CFR 60, Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids. Storage Tank Nos. 3, 4 and 6 are subject to Rule 62-296.508 - Petroleum Liquid Storage (RACT).

This facility is not a major source of hazardous air pollutants (HAPs). It is therefore, exempt from the NESHAP, Subpart R, Gasoline Distribution Facilities. However, as an area source (HAP) bulk gasoline terminal, this facility is subject to the NESHAP, Subpart BBBBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities and Gasoline Dispensing Facilities (see Specific Condition Nos. A.21 and B.23).

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

E.U. ID No.	Brief Description
-001	Truck Loading Rack
-002	Distillate Tank Group
-005	Gasoline Tank Group
-008	Additive Tank Group

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit, however, are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements
Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History / ID Number Changes
Statement of Basis

These documents are on file with permitting authority:
Initial Title V Air Operation Permit issued October 21, 1999
Title V Air Operation Permit Administrative Correction issued January 31, 2000
Application for a Title V Air Operation Permit Renewal received February 13, 2004
Renewal Title V Air Operation Permit No. 05700881-011-AV issued January 10, 2006
Application for a Title V Air Operation Permit Revision received August 14, 2008
Revision Title V Air Operation Permit No. 05700881-015-AV issued March 20, 2009
Application for a Title V Air Operation Permit Renewal received May 28, 2010

Section II. Facility-wide Conditions.

The following conditions apply facility-wide:

1. APPENDIX TV-6, TITLE V CONDITIONS, is a part of this permit.
{Permitting note: APPENDIX TV-6, TITLE V CONDITIONS, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided a copy when requested or otherwise appropriate.}

2. Not Federally Enforceable: General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), F.A.C.]

3. Insignificant Emissions Units and/or Activities. Appendix I-1, List of Insignificant Emissions Units and/or Activities, is a part of this permit.
[Rules 62-213.440(1), 62-213.430(6), and 62-4.040(1)(b), F.A.C.]

4. Not Federally Enforceable: General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department or its' delegated agent, the Environmental Protection Commission of Hillsborough County.
[Rule 62-296.320(1)(a), F.A.C.; Permit Nos. 0570081-002-AC & 0570081-011-AV]

A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
B) Where possible and practical, procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
C) Immediately attend to all spills/waste as appropriate.
D) Operate the VCU or flare at all time when loading VOLs.

5. Not Federally Enforceable: Reasonable precautions to prevent emissions of unconfined particulate matter at this facility in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, blasting of paint from storage tanks, alterations, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. Reasonable precautions shall include, but not limited to, the following:

A) Maintenance of parking areas and yards.
B) Removal of particulate matter from paved areas, buildings and work areas under the control of the permittee.

C) Reduce vehicular speed. Post limits, if necessary.
[Rule 62-296.320(4)(c)2., F.A.C.]

6. The maximum allowable volatile organic compound (VOC) emissions for the facility (tank farm and truck racks) shall not exceed 101 tons per twelve consecutive month period.
[Construction Permit 0570081-013-AC; Rule 62-212.300, F.A.C.; and Title V Permit Revision No. 0570081-015-AV, and Title V Renewal Application Received May 28, 2010]

{Permit Note: Facility-wide PTE includes degassing emissions from storage tanks.}

7. As requested by the permittee, in order to establish the facility as a synthetic minor for Hazardous Air Pollutants (HAP), the following emission limitations and terms shall apply:
[Rules 62-212.300 and 62-4.070(3), F.A.C.; and 40 CFR 63.420]

A) The HAP, as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP, and less than 25 tons in any 12 consecutive month period for any combination of HAPs.

B) The MBTE content of the gasoline stored and handled by the facility shall not exceed 9.0 percent vapor weight annual average (11.4 percent liquid weight annual average].

8. As requested by the permittee and in order to demonstrate compliance with the exemption from 40CFR63 Subpart R (NESHAP for Gasoline Distribution Facilities), the permittee shall:
[40CFR63.420(d) and Permit 0570081-002-AC]

1. Operate the facility such that none of the facility parameters used to calculate results under 40CFR63.420(a)(1) (see No. 3 below) is exceeded in any rolling 30-day period; and
2. Maintain records and provide reports in accordance with the provisions of 40CFR63.428(j) (see No.4 below)
3. Parameters from 40CFR63.420(a)(1):

$$ET=CF\ [0.59\ (TF)\ (1-CE) + 0.17\ (TE) + 0.08\ (TES) + 0.038\ (TI) + 8.5\ 10^{-6}\ (C) + KQ] + 0.04\ (OE)$$

where:
ET = emissions screening factor for bulk gasoline terminals;
CF = 0.161 for bulk gasoline terminals and pipeline breakout stations that do not handle any reformulated or oxygenated gasoline containing 7.6 percent by volume or greater methyl tert-butyl ether (MTBE), OR
CF = 1.0 for bulk gasoline terminals and pipeline breakout stations that handle reformulated or oxygenated gasoline containing 7.6 percent by volume or greater MTBE;

CE = control efficiency limitation on potential to emit for the vapor processing system used to control emissions from fixed-roof gasoline storage vessels [value should be added in decimal form (percent divided by 100)];

TF = total number of fixed-roof gasoline storage vessels without an internal floating roof;

TE = total number of external floating roof gasoline storage vessels with only primary seals;

TES = total number of external floating roof gasoline storage vessels with primary and secondary seals;

TI = total number of fixed-roof gasoline storage vessels with an internal floating roof;

C = number of valves, pumps, connectors, loading arm valves, and open-ended lines in gasoline service;

Q = gasoline throughput limitation on potential to emit or gasoline throughput limit in compliance with paragraphs (c), (d), and (f) of this section (liters/day);

K = $4.52\ 10^{-6}$ for bulk gasoline terminals with uncontrolled loading racks (no vapor collection and processing systems), *OR*

K = $(4.5\ 10^{-9})(EF + L)$ for bulk gasoline terminals with controlled loading racks (loading racks that have vapor collection and processing systems installed on the emission stream);

EF =emission rate limitation on potential to emit for the gasoline cargo tank loading rack vapor processor outlet emissions (mg of total organic compounds per liter of gasoline loaded);

L = 13 mg/l for gasoline cargo tanks meeting the requirement to satisfy the test criteria for a vapor-tight gasoline tank truck in § 60.501 of this chapter, *OR*

L = 304 mg/l for gasoline cargo tanks not meeting the requirement to satisfy the test criteria for a vapor-tight gasoline tank truck in § 60.501 of this chapter;

OE = other HAP emissions screening factor for bulk gasoline terminals or pipeline breakout stations (tons per year). OE equals the total HAP from other emission sources not specified in parameters in the equations for ET or EP .

4. Records and Reports which will be available for inspection shall include:
   a. Initial notification from December 16, 1996 with the calculated value of E_T.
   b. Maintain a record of the calculations in 40CFR63.420(a)(1) including methods, procedures, and assumptions supporting the calculations for determining criteria in (1) above.
   c. At any time following the notification required under (a) above, and prior to any of the parameters being exceeded, the permittee may notify the Administrator of modifications to the facility parameters. Each such notification shall document any expected HAP emission change resulting from the change in parameter.

9. The permittee shall notify the Air Compliance Section of the Environmental Protection Commission of Hillsborough County at least 15 days prior to the date on which each formal compliance test is to begin of the date, time, and place of each such test, and the contact person who will be responsible for coordinating and having such test conducted.
[Rules 62-297.310(7)(a)9., F.A.C.]

10. The permittee must submit to the Environmental Protection Commission of Hillsborough County each calendar year, a completed DEP Form 62-210.900(5), "Annual Operating Report (AOR) for Air Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year, except that the AOR for year 2008 shall be submitted by May 1, 2009. The emission report shall contain the following information pursuant to Subsection 403.061(13), Florida Statutes:
[Rule 62-210.370(3), F.A.C.]

A) Annual amount of materials and/or fuels utilized.
B) Annual emissions (note calculation basis).*
C) Any changes in the information contained in the permit application.

* Emission estimates shall be calculated using the most accurate procedures available, which at the time of this permit is described in Tanks 4.0.9d as submitted in the application. Fugitive emissions associated with the loading rack (Specific Condition B.6) shall be calculated on 13 mg/liter.

11. When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of this permit, which defines day one.
[Rule 62-213.440(1), F.A.C.]

12. The permittee shall submit all compliance related notifications and reports required of this permit to the Environmental Protection Commission of Hillsborough County at:

Environmental Protection Commission of Hillsborough County
Air Management Division
3629 Queen Palm Drive
Tampa, FL 33619
Telephone: 813/627-2600 Fax: 813/627-2660

13. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch

Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

14. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes may include, and are not limited to the following, and may also require prior authorization before implementation: [Rules 62-210.300, 62-4.060, and 62-4.070(3), F.A.C.]

A) Alteration or replacement of any equipment* or major component of such equipment listed in the process description of this permit.
B) Installation or addition of any equipment which is a source of air pollution.
C) The storage or handling of any products other that those authorized by this permit.

15. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]

16. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable requirement or permit condition is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the Environmental Protection Commission of Hillsborough County.
[Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

17. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C.
[Rules 62-213.440(3) and 62-213.900, F.A.C.]

{Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., F.A.C. (see Condition 51. of APPENDIX TV-6, TITLE V CONDITIONS)}

18. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance

schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

19. A minimum of two copies of an operating permit application for a Title V Operating Permit Renewal shall be submitted to the EPC at least 225 days prior to the expiration date of this permit. [Rules 62-213.420(1)(a), F.A.C.]

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U. ID No. Brief Description
-002 Distillate Tank Group

Tank No.	Roof Type	Vol. (10^3gal.)	Dimension Diameter x Height	Color	Regulation
1	VFR	3276	120 x 40	White	Rule 62-296.320, F.A.C.
2	VFR	2604	120 x 32	White	Rule 62-296.320, F.A.C.

E.U. ID No. Brief Description
-005 Gasoline Tank Group

Tank No.	Roof Type-Primary/Secondary Seal	Volume (10^3gal.)	Dimension Diameter x Height	Color	Regulation
3	IFR - LM/RM	2520	120 x 32	White	Rule 62-296.508, F.A.C.
4	IFR - MS/RM	3192	120 x 40	White	Rule 62-296.508, F.A.C.
5	IFR - LM/RM	3192	120 x 40	White	NSPS, Subpart Kb
6	IFR - MS/RM	1806	90 x 40	White	Rule 62-296.508, F.A.C.
7	IFR - MS/RM	3381	120 x 40	White	NSPS, Subpart Ka
8 (8a)	IFR - MS/RM	6447	140 x 56	White	NSPS, Subpart Kb
9 (9a)	IFR - MS/RM	4738	120 x 56	White	NSPS, Subpart Kb
21 (201)	VFR (Slop Tank)	0.563	4 x 6	White	Rule 62-296.320, F.A.C.

E.U. ID No. Brief Description
-008 Additive Group Tanks

Tank No.	Roof Type	Vol. (x 10^3gal.)	Dimension Diameter x Height	Color	Regulation
20 (101)	HFR	10	8 x 27	White	Rule 62-296.320, F.A.C.

Glossary
IFR - Internal Floating Roof
VFR - Vertical Fixed Roof
HFR - Horizontal Fixed Roof
MS/RM - Mechanical Shoe Primary Seal/Rim-Mounted Secondary Wiper Seal
LM/RM - Liquid-Mounted Primary Seal/Rim-Mounted Secondary Wiper Seal

{Permitting note(s): Storage Tank Nos. 5, 8, and 9 are regulated under 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or

Modification Commenced After July 23, 1984. Storage Tank No. 7 is regulated under 40 CFR 60, Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. Storage Tank Nos. 3, 4 and 6 are subject to Rule 62-296.508 - Petroleum Liquid Storage (RACT).}

The following specific conditions apply to the emissions unit(s) listed above:

A.1. The following restrictions and limitations shall apply to these emission units:
[Rules 62-213.300 and 62-4.070(3), F.A.C.; Permit Nos. 0570081-013-AC and -015-AV]

a) Gasoline Tank Group:
   i) Maximum allowable VOC emissions shall not exceed 55.2 tons per twelve consecutive month period
   ii) Maximum product throughput: 600,000,000 gallons per twelve consecutive month period
   iii) Allowable product storage: gasoline, ethanol and petroleum contact water for slop tank
   iv) Maximum weighted average annual product true vapor pressure: 7.6 psia (equivalent RVP 11 psia) and shall also comply with the requirements of 40 CFR 80. During the months of November, December, January, February, and March, the RVP shall not exceed 13.5 for each and every gallon.
   v) The above VOC emission limit includes 0.1 tons resulting from the slop tank based on gasoline with a RVP 11 annual average as a worse-case estimate. There is no throughput limitation for the slop tank, but all the petroleum contact water must have been generated at this facility.

b) Distillate Tank Group:
   i) Maximum allowable VOC emissions shall not exceed 4.4 tons per twelve consecutive month period.
   ii) Maximum product throughput: 300,000,000 gallons per twelve consecutive month period.
   iii) Allowable product storage: diesel fuel
   iv) Maximum average annual product true vapor pressure: 0.012 psia

c) Additive Tank Group:
   i) Maximum allowable VOC emissions shall not exceed 0.1 tons per twelve consecutive month period
   ii) Maximum product throughput: 3,500,000 gallons per twelve consecutive month period
   iii) Allowable product storage: additives
   iv) Maximum average annual product true vapor pressure: 0.0988 psia

d) Fugitive Emission from connectors, valves, pump seals, open-ended lines and other components:

i) Maximum allowable VOC emissions shall not exceed 2.0 tons per twelve consecutive month period
ii) No more valves, connectors, pump seals, open-ended lines or other components which may increase this fugitive emission release shall be added to the facility without prior authorization from the Environmental Protection Commission of Hillsborough County. Replacement of the items identified in previous applications which were used to quantify these emissions shall be allowed without prior authorization.
iii) Valves, connectors, pump seals, open-ended lines and other components shall be maintained to minimize fugitive emissions.

e) Only the tank(s) described in each group are allowed to the store the products listed.
f) All tanks shall be clearly identified by number.
g) Each tank shall be maintained to retain the structure, roof type, and color characteristics described in the application.
h) When storing a new product in an existing tank, the permittee shall take all necessary precautions to ensure that the affected tank is rid completely of the old product prior to storing the new petroleum liquid.
i) All the enclosure equipment and devices on these tanks intended to reduce VOC emissions shall be maintained in good repair.

A.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE)]

Emission Limitations and Standards
{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.3. The maximum allowable volatile organic compound (VOC) emissions for the tank farm shall not exceed 75.1 tons per twelve consecutive month period.

{Permit Note: Overall tank emissions include degassing emissions}

[Rules 62-212.300, F.A.C. and Permit Nos. 0570081-013-AC and -015-AV and Title V Renewal Application Received May 28, 2010]

A.4. Tank Nos. 3, 4, and 6 are subject to RACT for Petroleum Liquid Storage Tanks with Internal Floating Roofs shall comply with the following terms and conditions.
[Rules 62-296.508 and 62-4.070(3), F.A.C.]

A) The permittee shall ensure that there are no visible holes tears or other openings in the seal or seal fabric material.
B) The permittee shall ensure that all openings, except stub drains are equipped with covers, lids, or seals such that:
   1) The cover, lid, or seal is in the closed position at all times except on demand for sampling, maintenance, repair, or necessary operating practices; and,
   2) Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof supports; and,
   3) Rim vents, if provided, are set to open when the roof is being floated off the roof supports or at the manufacturer's recommended setting.

A.5. Tank No. 7 is subject to 40CFR60 Subpart Ka and shall comply with the following:
[Rules 62-204.800, F.A.C. and 40CFR60.112a]

1) The tank shall be maintained with a fixed roof with an internal floating type cover equipped with a continuous closure device between the tank wall and the cover edge. The cover is to be floating at all times, (i.e., off the leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the cover is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. Each opening in the cover except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface. Each opening in the cover except for automatic bleeder vents, rim space vents, stub drains and leg sleeves is to be equipped with a cover, seal, or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the cover is floating except when the cover is being floated off or is being landed on the leg supports. Rim vents are to be set to open only when the cover is being floated off the leg supports or at the manufacturer's recommended setting.

A.6. Tank Nos. 5, 8 and 9 are subject to 40CFR60 Subpart Kb and shall comply with the following terms and conditions:
[Rules 62-204.800 and 62-4.070(3), F.A.C.; 40CFR60.112b(a); Permit No. 0570081-013-AC]

1) The permittee shall maintain a fixed roof in combination with an internal floating roof meeting the following specifications:
   i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling,

emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

ii) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
   a) A foam- or liquid-filled seal mounted in contact with the liquid (liquid- mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
   b) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
   c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

iii) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

iv) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

v) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

vi) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover or equivalent that covers at least 90 percent of the opening.

viii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

A.7. Tank Nos. 1, 2, 20 (101), and 21 (201 - slop tank) are subject to Rule 62-296.320, loading shall comply with the following terms and conditions:
[Rules 62-296.320(1)(a) and 62-4.070(3), F.A.C.]

A. The Environmental Protection Commission of Hillsborough County deems necessary and orders the permittee to use submerged filling techniques (bottom loading) for all tanks subject to this regulation. The EPC finds submerged filling techniques as known and existing vapor emissions controls.

A.8. All barge unloadings shall comply with the following terms and conditions:
[Rule 62-296.320(1)(a) and 62-4.070(3), F.A.C.]

A. The permittee shall use good air pollution control practices to minimize emissions.
B. During each barge unloading, the pipes, valves, fittings, and associated equipment shall be inspected for leaks. For purposes by this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 7 calendar days after it is detected. The permittee shall notify the EPC within 24 hours of the problem in conjunction with Specific Condition No. B.20. A written record of the problem and corrective actions implemented shall be maintained.
C. Ballasting of the marine vessel which results in the discharge of hydrocarbon vapors to the outside air is prohibited while operating inside the waters of Tampa Bay.
D. All openings on the vessel which can be closed during product unloading and storage shall be closed to the extent practical.

A.9. Reserved

<u>Test Methods and Procedures</u>
{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

A.10. All emissions tests performed pursuant to the requirements of Rule 62-296.508 (internal floating roofs) shall comply with the following requirements:

A. Internal Floating Roof and Roof Seals. The test method for volatile organic compounds shall be p. 6-2 of EPA 450/2-77-036, incorporated and adopted by reference in Chapter 62-297, F.A.C.
B. Test procedures shall meet all applicable requirements of Chapter 62-297, F.A.C.

A.11. Reserved.

A.12. Reserved.

A.13. All emissions tests performed pursuant to 40CFR60 Subpart Kb (internal floating roof) shall comply with the following requirements:

a) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel. [40CFR60.113b(a)(1)]

b) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the EPC in the inspection report required in § 60.115b(a)(3) (Specific Condition A.18). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40CFR60.113b(a)(2)]

c) For vessels equipped with a double-seal system as specified in §60.112b(a)(1)(ii)(B):
   (i) Visually inspect the vessel as specified in paragraph (d) of this condition at least every 5 years; or
   (ii) Visually inspect the vessel as specified in paragraph (b) of this condition.

d) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in 40CFR60.113b.(a)(2) (Referenced above). [40CFR60.113b(a)(4)]

e) Notify the EPC in writing at least 30 days prior to the initial fill or refill of each storage vessel for which an inspection is required by 40CFR60.113b.(a)(1) and (a)(4) (Referenced above) to afford the EPC the opportunity to have an observer present. If the inspection required by 40CFR60.113b.(a)(4) (Referenced above) is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the EPC at least 7 days prior to the initial fill or refill of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the EPC at least 7 days prior to the initial fill or refill. [40CFR60.113b(a)(5)]

Recordkeeping and Reporting Requirements

A.14. Compliance with the limitations of Specific Condition Nos. A.1. and A.3. shall be demonstrated through the use of a monthly recordkeeping system. The recordkeeping system shall contain the following information for each tank and be made available for inspection by the EPC for the most recent 5 year period:
[40CFR60.115a, Rule 62-4.070(3), F.A.C. and Permit Nos. 0570081-013-AC and -015-AV,]

a) Tank Number
b) Month, Year
c) Product(s) Stored
d) Period of Storage for Each Product(s) (days)
e) Average product true vapor pressure (psia) or equivalent RVP for gasoline only
f) Product(s) Throughput (gallons)
g) Rolling 12 (twelve) month throughput of product(s) by tank. (gallons)

A.15. The permittee shall visually inspect all automatic bleeder vents and rim vents within twenty-four (24) hours of the roof either floating off or landing on the roof leg supports in order to ensure compliance with Specific Condition Nos. A.5, A.6., and A.7.
[Rule 62-4.070(3), F.A.C.]

A.16. The permittee shall promptly notify (by telephone) the Environmental Protection Commission of Hillsborough County of any abnormal event which occurs at the facility. Within thirty (30) days of this notification report the permittee shall submit a written report detailing the following:
[Rule 62-4.070(3), F.A.C.]

a) Tank Identification Number
b) The Abnormal Event
c) Corrective Action Taken

For purposes of this condition, an abnormal event, in part, shall mean:

a) Identification of any item out of compliance
b) The landing or floating off of a roof on its support legs.
c) Any tank out of service for more than four (4) weeks.

A.17. Annual seal inspections required in Specific Condition No. A.13. shall be conducted and a written report prepared. Monthly visual observations of seals to verify compliance with A.4., A.5., A.6., A.7. will be conducted and a written report of corrective actions taken upon discovery of holes, tears, or other openings shall be prepared. Both reports shall be kept on site and made available upon request to the Environmental Protection Commission of Hillsborough County.
[Rule 62-4.070(3), F.A.C.]

A.18. The permittee of each storage vessel subject to 40CFR60 Subpart Kb as specified in § 60.112b(a) shall keep records and furnish reports as required by this Specific Condition depending upon the control equipment installed to meet the requirements of §60.112b. The owner or operator shall keep copies of all reports and records required by this section for at least 5 years. [40CFR60.115b; and Rules 62-4.070(3) & 62-213.440(1)(b), F.A.C.]

a) Keep a record of each inspection performed as required by § 60.113b(a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [40CFR60.115b.(a)(2)]
b) If any of the conditions described in § 60.113b(a)(2) (Specific Condition A.13) are detected during the annual visual inspection required by § 60.113b(a)(2), a report shall be furnished to the EPC within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. [40CFR60.115b.(a)(3)]
c) After each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. [40CFR60.115b.(a)(4)]

A. 19. The permittee of each tank(s) subject to Subpart Kb (40CFR60.116b) shall keep copies of all records required by this section for at least 5 years. [40CFR60.116b and Rule 62-4.070(3), F.A.C.]

a) The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
b) Except as provided in paragraphs 40CFR60.116b.(f) (Referenced below), the owner or operator of each storage vessel either with a design capacity greater

than or equal to 151 m^3 storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa or with a design capacity greater than or equal to 75 m^3 but less than 151 m^3 storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40CFR60.116b(c)]

c) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. [40CFR60.116b(e)]
   i) For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
   ii) For crude oil or refined petroleum products the vapor pressure may be obtained by the following:
      a) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference-see § 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
      b) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.
   ii) For other liquids, the vapor pressure:
      a) May be obtained from standard reference texts, or
      b) Determined by ASTM Method D2879-83 (incorporated by reference-see § 60.17); or
      c) Measured by an appropriate method approved by the Administrator; or
      d) Calculated by an appropriate method approved by the Administrator.

d) The owner or operator of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements: [40CFR60.116b(f)]
   i) Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be

stored will be determined using the methods described in 40CFR60.116b(e) (Referenced in c) above).

ii) For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in § 60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods:

a) ASTM Method D2879-83 (incorporated by reference-see § 60.17); or
b) ASTM Method D323-82 (incorporated by reference-see § 60.17); or
c) As measured by an appropriate method as approved by the Administrator.

A.20. The General Provisions Requirements - the 40 CFR 60, Subpart A apply to the NSPS emissions unit listed above. [Rule 62-204.800(7)(d), F.A.C.]

A.21. The above emissions unit is subject to the NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities and Gasoline Dispensing Facilities, 40 CFR 63, Subpart BBBBBB, which is attached as part of this permit under Appendix 40 CFR 63, Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities and Gasoline Dispensing Facilities). The permittee must comply with the standards in the Tables 1, 2 and 3 of the Subpart no later than January 10, 2011. [62-4.070(3), F.A.C., 40 CFR 63.11080]

Subsection B. This section addresses the following emissions unit(s).

-001 Truck Loading Rack T/T

No.	Transport	Regulation	Control
T/T #1 & #2	Loading Rack	NSPS, Subpart XX	Primary VCU - 10 mg/l
		Rule 62-296.510, F.A.C.	Back-up Flare - 35 mg/l

The following specific conditions apply to the emissions unit(s) listed above:

Enforceable Potential to Emit (PTE) Parameters

B.1. The maximum annual throughput of petroleum products through T/T #1 and #2 shall not exceed the following per any twelve consecutive month period:
[Rule 62-4.160(2), 62-210.200, F.A.C., Definitions - (PTE) and Permit Nos. 0570081-013-AC and -015-AV]

Product	Maximum Annual Throughput, gallons	Maximum True Vapor Pressure of Liquid, psia
Gasoline	250,000,000	7.6
Diesel	300,000,000	0.012
Additive	3,500,000	0.0988

B.2. Of the maximum permitted loading rack throughput specified in Specific Condition No. B.1., the maximum annual throughput of petroleum products through T/T #1 and #2, when the secondary Flare is in operation, shall not exceed the following per any twelve consecutive month period:
[Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C. and Permit Nos. 0570081-013-AC and -015-AV]

Product	Maximum Annual Throughput, gallons	Maximum True Vapor Pressure of Liquid, psia
Gasoline	17,500,000	7.6
Diesel	15,000,000	0.012
Additive	350,000	0.0988

B.3. All vapors displaced during product loading into the tanker trucks at T/T #1 and #2 shall be directed to the vapor control system, which consists of the primary VCU and the back-up flare. The VCU and the flare shall be maintained in good working order.
[Rules 62-4.160(2), 62-213.440(1), 62-296.320(1)(a) and 62-296.510, F.A.C., 40CFR60.502(a)]

Emission Limitations and Standards

{Permitting note: Table 1-1, Summary of Air Pollutant Standards and Terms, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.4. The maximum VOC emissions from product loading being exhausted from the primary VCU shall not exceed 10 milligrams per liter of gasoline loaded into gasoline trucks.
[Rules 62-212.300 and 62-296.510, F.A.C., 40CFR60.502(b) and Permit No. 0570081-002-AC and 013-AC]

B.5. The maximum VOC emissions from product loading being exhausted from the secondary Flare shall not exceed 35 milligrams per liter of gasoline loaded into gasoline trucks.
[Rules 62-212.300 and 62-296.510, F.A.C., 40CFR60.502(b) and Permit Nos. 0570081-002-AC and 013-AC]

B.6. The maximum allowable VOC emissions for Truck Rack T/T #1 and #2 shall not exceed 25.9 tons per twelve consecutive month period.
[Rules 62-4.070(3) and 62-210.650, F.A.C. and Permit Nos. 0570081-013-AC and -015-AV]

B.7. The permittee shall comply with the following requirements of Subpart XX- Standards of Performance for Bulk Gasoline Terminals:

A) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. [40CFR60.502(d)]
B) Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: [40 CFR 60.502(e)]
    1. The permittee shall obtain the vapor tightness documentation described in § 60.505(b) (Specific Condition No. B.14.) for each gasoline tank truck which is to be loaded at the affected facility.
    2. The permittee shall require the tank identification number to be recorded as each gasoline tank truck that is loaded at the affected facility.
    3. The permittee shall cross-check each tank identification number obtained in paragraph (2) above with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.
    4. The permittee shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the affected facility within 3 weeks after the loading has occurred.
    5. The permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.

C) The permittee shall act to assure that the loadings of gasoline tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with facility's vapor collection system. [40 CFR 60.502(f)]

D) The permittee shall act to assure that the facility's and tank truck's vapor collection systems are connected during each loading of a gasoline tank truck. Examples of actions to accomplish this include training drivers in hookup procedures and posting visible reminder signs at the loading rack. [40 CFR 60.502(g)]

E) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4500 pascal (450 mm of water) during product loading when measured by the procedure specified in 40 CFR 60.503(d) (Specific Condition No. B.11). The pressure shall be monitored and recorded daily. If the pressure exceeds 4500 pascal (450 mm of water) then it shall be considered a deviation. In the event of a deviation, the facility shall immediately shut down the VCU or Flare and cease loading product. The permittee shall notify the EPC within 24 hours of the problem in conjunction with Specific Condition No. B.20. The VCU or Flare shall not be operated until the problem is corrected and a written record of the problem and corrective actions implemented shall be maintained. [40 CFR 60.502(h)]

F) No pressure vacuum vent in the bulk petroleum products terminal's vapor collection system shall begin to open at a system pressure less than 4500 pascal (450 mm of water).[40 CFR 60.502(i)]

G) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purpose of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. [40 CFR 60.502(j)]

B.8. Operation of the VCU and Back-up Flare system is subject to the following requirements:
[40 CFR 60.503 and 60.18]

A. The Back-up Flare shall be operated with no visible emissions as determined by the Method 22 (Specific Condition B.9.) except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. [40CFR60.18(c)(1)]

B. The Back-up Flare shall be operated with a flame present at all times. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. [40CFR60.18(f)(2)]

C. The permittee shall not operate the Back-up Flare if the net heating value of the gas being combusted is less than 300 Btu/SCF. [40 CFR 60.18(c) (3)]

D. The permittee shall not operate the Back-up Flare system with the Flare tip exit velocity greater than V_{max} as determined by the following equation: [Rule 40 CFR 60.18(f)(6)]

$$V_{max} = 8.706 + 0.7084 (H_T)$$

V_{max} =Maximum Permitted Velocity (M/S)

H_T = The net heating value as determined by the procedures as outlined in 40 CFR 60.18(f)(3).

E. The VCU and Flare shall be operated at all times when emissions are directed to it. [40 CFR 60.18(e)]

Test Methods and Procedures

{Permitting note: Table 2-1, Summary of Compliance Requirements, summarizes information for convenience purposes only. This table does not supersede any of the terms or conditions of this permit.}

B.9. Compliance with 40CFR60.502(b), (c) and Specific Condition Nos. B.4, B.5, B.6, B.7, and B.8 shall be determined using EPA Methods 2, 2A, 2B, 2C, or 2D as appropriate, 21, 22, 25A or 25B and 27 as contained in 40CFR60, Appendix A and adopted by reference in Rule 62-297, F.A.C. as listed below. Two copies of the test data shall be submitted to the Air Management Division of the Environmental Protection Commission of Hillsborough County office within 45 days of such testing. Failure to submit the input rate of operation at conditions during testing which do not reflect actual operating conditions may invalidate the data. Testing shall be conducted while loading a typical mix of products.
[Rules 62-4.070(3), 62-297.440(2)(b), and 62-296.510, F.A.C., 40 CFR 60.503 and 40 CFR 60.18(c)]

A) In order to demonstrate compliance with Specific Condition No. B.4, the permittee shall perform VOC emission testing on the primary VCU annually. In order to demonstrate compliance with Specific Condition No. B.5, the permittee shall perform compliance testing on the Back-up Flare at least 120 days prior to permit renewal for opacity, inlet vapor net heating value, and actual flare tip velocity. However, if the Back-up Flare operates for more than 10% of the total throughput (gallons) through the loading rack for a calendar year, the Back-up Flare shall be tested for opacity, inlet vapor net heating value, and actual flare tip velocity within 90 days of the end of that calendar year.

B) The EPA Method 22 observation period for the Back-up Flare shall be at least two hours in duration during formal compliance testing. The facility shall also conduct daily instantaneous visible emissions observations on the VCU and Back-up Flare when in operation and document whether visible emissions were present. The facility shall maintain a record of the date, time, observer, and results of the observations, including any corrective action taken to eliminate the visible emissions. [40CFR60.18(f)(1) and 62-4.070(3), F.A.C.]

C) The net heating value of the gas being combusted shall be determined using methodology described in 40CFR60.18(f) for the Flare only.

D) The performance test shall be 6 hours long during which at least 300,000 liters of gasoline is loaded. If this is not possible, the test may be continued the same

day until 300,000 liters of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000-liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs. [40 CFR 60.503(c)(1)]

E) If the vapor collection system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled. [40 CFR 60.503(c)(2)]

F) To determine the volume (L) of gasoline dispensed during the test period at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used. [40 CFR 60.503(c)(7)]

B.10. Immediately before the performance test required to determine compliance with §60.502(b), (c), and (h) (Specific Condition Nos.B.4 and B.7.) the permittee shall use EPA Method 21 to monitor for leakage of vapor from all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.
[40 CFR 60.503(b)]

B.11. The permittee shall determine compliance with the standard in § 60.502(h) (Specific Condition B.7) as follows:

A. A pressure measurement device (liquid manometer, magnehelic gauge or equivalent instrument), capable of measuring 500 mm of water gauge pressure with ± 2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.

B. During the performance test as required in Specific Condition No. B.9., the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.
[40 CFR 60.503(d)(1)&(2)]

B.12. Reserved.

B.13. The permittee shall install, maintain and calibrate a monitoring system that continuously monitors and records the combustion chamber temperature.
[Rule 62-4.070(3), F.A.C.)

Recordkeeping and Reporting Requirements

B.14. The tank truck vapor tightness documentation required in 40CFR60.502(e)(1) (Specific Condition No. B.7.) shall be kept on file in a permanent form available for inspection. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by EPA Method 27. This documentation shall include, as a minimum, the following information:
[40 CFR 60.505(a)&(b)]

i) Test Title: Gasoline Delivery Tank Pressure Test - EPA reference Method 27.
ii) Tank owner and address.
iii) Tank identification number.
iv) Test location.
v) Date of test.
vi) Tester name and signature.
vii) Witnessing inspector, if any: Name, signature and affiliation.
viii) Test Results: Actual pressure change in 5 minutes, mm of water (average for 2 runs)

B.15. A record of each monthly leak inspection required under 40CFR60.502(j) (Specific Condition No. B.7.) shall be kept on file at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following information:
[40 CFR 60.505(c) and 62-213.440, F.A.C.]

i) Date of inspection.
ii) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
iii) Leak determination method.
iv) Corrective action (date each leak repaired; reasons for repair interval in excess of 15 days)
v) Inspector name and signature.

B.16. The permittee shall keep documentation of all notifications required by 40CFR60.502(e)(4) (Specific Condition No. B.7.) on file at the facility for at least five (5) years.
[40 CFR 60.505(d) and Rule 62-213.440, F.A.C.]

B.17. The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least five years.
[40 CFR 60.505(f) and Rule 62-213.440, F.A.C.]

B.18. The permittee shall maintain a monthly recordkeeping system in order to ensure compliance with the emission limitations for each truck loading rack as noted in Specific

Condition Nos. B.1., B.2., B.5. and B.6. The recordkeeping system shall contain the following information for each T/T and made available for inspection by the Environmental Protection Commission of Hillsborough County for the most recent 5 year period:
[Rule 62-4.070(3), F.A.C. and Construction Permit Nos. 0570081-002-AC and 013-AC]

A) Month, year
B) Identification of loading rack number (T/T #1, #2)
C) Individual Product throughput: _____ gallons
D) Average Product Vapor Pressure (psia), or equivalent RVP for gasoline product only
E) Calculated Emissions (tons)
F) Rolling cumulative 12 month total for items C) and E) above.

B.19. The pollution control equipment shall be maintained in good repair to perform adequately the function for which it was intended. Maintenance shall include, but is not limited to, bi-weekly inspections and replacement or repair of faulty equipment when necessary or as required by the manufacturer. Any maintenance/repair performed should be recorded. Records shall be maintained for the most recent 5 year period and made available for inspection upon request.
[Rule 62-4.070(3), F.A.C.]

B.20. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. No trucks shall be hooked up for filling once the equipment or process failure is recognized. Truck loading shall restart only after the malfunction is completely resolved. The permittee shall notify the Environmental Protection Commission of Hillsborough County within twenty-four (24) hours of any malfunction, reporting the problem and the duration of excess emissions.
[Rule 62-210.700, F.A.C.]

B.21. The General Provisions Requirements - the 40 CFR 60, Subpart A apply to the NSPS emissions unit listed above. [Rule 62-204.800(7)(d), F.A.C.]

<u>Compliance Assurance Monitoring</u>

B.22. The above emissions unit is equipped with two control devices, a Primary VCU and a Back-up Flare, and is subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C.
[40 CFR 64; Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

B.23. The above emissions unit is subject to the NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities and Gasoline Dispensing Facilities, 40

CFR 63, Subpart BBBBBB, which is attached as part of this permit under Appendix 40 CFR 63, Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities and Gasoline Dispensing Facilities). The permittee must comply with the standards in the Tables 1, 2 and 3 of the Subpart no later than January 10, 2011. [62-4.070(3), F.A.C., 40 CFR 63.11080]