

FINAL DETERMINATION

FOR

Transmontaigne Product Services, Inc.
Tampa Terminal

Hillsborough County

Construction Permit

Application Number

0570081-017-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

November 7, 2013

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on October 9, 2013 that included an Intent to Issue Air Construction Permit No. 0570081-017-AC to TransMontaigne Product Services, Inc. The facility is located at 1523 Port Ave, Tampa, Hillsborough County, FL 33605. The air construction permit authorizes an increase in the throughput of gasoline through the storage tanks and the loading rack. In addition, this permit authorizes construction of an internal floating roof on Tank No. 1.

The Public Notice of Intent to Issue was published in The Tampa Tribune on October 23, 2013.

COMMENTS/CHANGES

On October 17, 2013, comments were submitted via email by TransMontaigne Product Services, Inc. Listed below is each comment and a response to each in the order that the comment was received. Where duplicative comments exist, the original response is referenced. The comments are not considered significant enough to reissue the DRAFT Permit and require another Public Notice. In addition, comments were not received from the public.

Comment No. 1: In Specific Condition A.1.A) ii), request that the allowable product storage be changed to read “gasoline or lower vapor pressure product.”

Response: The potential emissions for EU No. 005 - Gasoline Tank Group are based on the tanks storing gasoline, which is worst case. Storing a product with a lower vapor pressure in the tanks is not expected to result in an exceedance of the potential emissions. Therefore, the change is made as requested.

Comment No. 2: In Specific Condition A.1.B) ii), request that the allowable product storage be changed to read “distillate or lower vapor pressure product.”

Response: The potential emissions for EU No. 002 - Distillate Tank Group are based on the tanks storing diesel fuel, which is worst case. Storing a product with a lower vapor pressure in the tanks is not expected to result in an exceedance of the potential emissions. Therefore, the change is made as requested.

Comment No. 3: In Specific Condition A.8, B), this condition requires notification to the EPC within 24 hours of identification of a leak in fugitive components during barge unloading. NSPS Subpart XX and NESHAP Subpart BBBB require monthly inspections of fugitive components in gasoline service and repairs of any leak within 14 days. Additionally, NESHAP Subpart BBBB requires the first repair attempt within 5 days of the discovery. TransMontaigne proposes that the entire sentence requiring 24-hour notification be removed or reworded to require repair within a certain timeframe, but no notification.

Response: TransMontaigne is not required by a state or federal rule to notify EPC staff within 24 hours

of a detection of a leak in the barge loading system. Therefore, in order to maintain consistency with the leak repair requirements of 40 CFR 63 Subpart BBBBBB, the condition is changed as follows.

From:

A.8. All barge unloadings shall comply with the following terms and conditions: [Rule 62-296.320(1) 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.19. 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.

To:

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

- A) The permittee shall use good air pollution control practices to minimize emissions.
- B) Once per calendar month, during barge unloading of gasoline, the pipes, valves, fittings, and associated unloading equipment shall be inspected for leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. A written record of the problem and corrective actions implemented shall be maintained and shall be made available upon request.
- 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.

Comment No. 4: In Specific Condition A.13, this condition requires prompt notification and subsequent reporting of a roof landing event or when the roof is floated off of its legs. You indicated that the purpose of this condition is to make the EPC aware of emissions events. Since this permit includes emissions from roof landings and tank degassing, TransMontaigne suggests that these emissions are part of normal operation and the EPC should not require notification and reporting unless an item is out of compliance. We request that the landing or floating off of a roof on its support legs be removed as an abnormal event requiring notification and reporting.

Response: The facility's potential emissions include VOC emissions from landing each tank roof on the tank's support legs and VOC emissions from degassing the storage tanks. Because these activities are already included in the facility's potential VOC emissions, Specific Condition No. A.13. is changed as requested. However, because these activities are considered to be part of the facility's operations, Specific Condition No. A.11. is also changed as follows to require the facility to maintain records of the tank roof

landings and the tank degassing.

From:

A.11. 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 shall be made available upon request for inspection by the EPC, state, or federal agency for the most recent 5 year period: [40 CFR 60.115a, Rule 62-4.070(3), F.A.C., and Permit No. 0570081-013-AC]

- 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.13. 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:

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

To:

A.11. 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 shall be made available upon request for inspection by the EPC, state, or federal agency for the most recent 5 year period: [40 CFR 60.115a, Rule 62-4.070(3), F.A.C., and Permit No. 0570081-013-AC]

- 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)
- H) Number of times each tank roof is landed on the tank support legs per 12 consecutive month period
- I) Number of times each tank is degassed per 12 consecutive month period

A.13. 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:

- D) Identification of any item out of compliance
- E) Any tank out of service for more than four (4) weeks.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the permit as drafted with the changes noted above.

ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Dudley Tarlton
VP, ESOH
Transmontaigne Product Services, Inc.
1670 Broadway, Suite 1300
Denver, CO 80202

Re: Hillsborough County - AP

Dear Mr. Tarlton:

Enclosed is Permit Number 0570081-017-AC to increase the throughput of gasoline through the tanks and the loading rack and construct an internal floating roof on Tank No. 1, issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Drive, Tampa, Florida 33619; and by filing a copy of the Notice of Appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Tampa, Florida.

Sincerely,

Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

Transmontaigne Product Services, Inc.
Denver, CO 80202

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cc: Florida Department of Environmental Protection – via email
Barry Andrews, P.E. – ANTEA Group (via email)

CERTIFICATE OF SERVICE

This is to certify that this NOTICE OF PERMIT ISSUANCE and all copies were mailed before the close of business on _____ to the listed persons.

FILING AND ACKNOWLEDGEMENT FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the clerk, receipt of which is hereby acknowledged.

Clerk

Date

PERMITTEE:
Transmontaigne Product Services, Inc.
1523 Port Ave.
Tampa, FL 33605

PERMIT/CERTIFICATION
Permit No.: 0570081-017-AC
County: Hillsborough
Expiration Date: April 1, 2015
Project: Increase Gas Throughput; Install Floating Roof
on Tank No. 1

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the EPC and made a part of hereof and specifically described as follows:

This permit authorizes an increase in the throughput of gasoline through the storage tanks and the loading rack. In addition, this permit authorizes construction of an internal floating roof on Tank No. 1. Tank No. 1, which was previously authorized to store diesel fuel and which will now store gasoline products, will be removed from the Distillate Tank Group (EU No. 002) and will be placed in the Gasoline Tank Group (EU No. 005). These changes will result in an increase of the facility-wide potential VOC emissions from 101.0 TPY to 182.0 TPY.

Transmontaigne receives petroleum products by marine vessel. The petroleum products are stored in the storage tanks and re-distributed by either loading tanker trucks through the loading rack, transporting the products through two pipelines, or occasionally loading back out to barges (diesel only). The facility operations, which are described further below, consist of ten permitted storage tanks (tanks) and one truck loading rack with a total of eight loading bays.

Volatile organic compound (VOC) emissions from the storage of petroleum products are controlled by the type of roof and type of tank seals on each tank. Also, the VOC emissions are controlled by limiting the product throughput and the Reid Vapor Pressures (RVP) values of the products. 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. A John Zink Company, Series GV-LH, forced draft open flame flare serves as the back-up control device.

Transmontaigne 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. The barge loading activity is considered an insignificant activity due to the relatively low level of emissions generated.

Transmontaigne blends gasoline with 10% or less of ethanol product. All ethanol products enter the terminal either by 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 ethanol in the storage tanks. The denaturing process occurs by metering E10 from the truck loading rack through a line, which has a "T" connection, to the cargo unloading line from the marine vessel to the tank. No additional blending skid is required. All ethanol stored at Tampa terminal is denatured.

Denatured ethanol from the storage tanks is blended with gasoline at the loading rack prior to being loaded into trucks. The truck loading rack 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 SS Oval Gear Tuthill Meters (TS20C) and eight 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 measured and routed to that specific gasoline line. The ethanol is then injected into the gasoline line serving each of the eight specific meters at the truck rack. The ethanol enriched gasoline with a maximum of 10% ethanol (E10) is 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 and E10 percentages are hand checked daily. In addition, 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 operational 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. A summary of the equipment at the facility is outlined below. Also, this facility handles and stores biodiesel in two biodiesel storage tanks. These tanks are considered to be insignificant activities pursuant to Rule 62-213.430(6), F.A.C. In addition, Tank Nos. 101 and 104, which store additives, and Tank No. 202 (formerly Tank No. 10), which stores PCW, are also considered to be insignificant activities pursuant to Rule 62-213.430(6), F.A.C.

Emission Units:

E.U. ID No.	Brief Description	
-001	Truck Loading Rack T/T	
Rack Nos.	Regulation	Control Device
T/T #1 & #2	40 CFR 63 Subpart BBBB 40 CFR 60 Subpart XX	Primary VCU - 10 mg/l Back-up Flare - 35 mg/l

	Rule 62-296.510, F.A.C.				
E.U. ID No.	Brief Description				
-002	Distillate Tank Group				
			Dimension		
Tank No.	Roof Type	Volume (10 ³ gal.)	Diameter x Height	Color	Regulation
2	VFR	2604	120 x 32	White	Rule 62-296.320, F.A.C.

E.U. ID No.	Brief Description				
-005	Gasoline Tank Group				
			Dimension		
Tank No.	Roof Type- Primary/Secondary Seal	Volume (10 ³ gal.)	Diameter x Height	Color	Regulation
1	IFR – MS/RM	3360	120 x 40	White	Rule 62-296.508, F.A.C. 40 CFR 60 Subpart Kb
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	40 CFR 60 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	40 CFR 60 Subpart Ka
8 (8a)	IFR - MS/RM	6447	140 x 56	White	40 CFR 60 Subpart Kb
9 (9a)	IFR - MS/RM	4738	120 x 56	White	40 CFR 60 Subpart Kb
201 (21)	HFR (Slop Tank)	0.563	4 x 6	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

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. 1, 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. Also, 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). Therefore, the facility is exempt from 40 CFR 63 NESHAP, Subpart R - Gasoline Distribution Facilities. However, as an area source of

HAP emissions, the facility is subject to the 40 CFR 63 NESHAP Subpart BBBBBB - Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

References Permit Nos.: 0570081-002-AC and 0570081-013-AC

Replaces Permit No.: NA

PERMITTEE:
Transmontaigne Product Services, Inc.

PERMIT/CERTIFICATION No.: 0570081-017-AC
PROJECT: Increase Gas Throughput; Install Floating Roof
on Tank No. 1

SPECIFIC CONDITIONS:

The following conditions apply facility-wide:

FW.1. 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.]

FW.2. 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 Environmental Protection Commission of Hillsborough County. [Rule 62-296.320(1), F.A.C. and Permit Nos. 0570081-002-AC and 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.

FW.3. Not Federally Enforceable: Reasonable precautions shall be taken 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: [Rule 62-296.320(4)(c)2., F.A.C.]

- 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.

FW.4. [Reserved]

FW.5. As requested by the permittee, in order to establish the facility as a synthetic minor for Hazardous Air Pollutants (HAP), the following limitations shall apply: [Rules 62-212.300 and 62-4.070(3), F.A.C.; and 40 CFR 63.420]

PERMITTEE:
Transmontaigne Product Services, Inc.

PERMIT/CERTIFICATION No.: 0570081-017-AC
PROJECT: Increase Gas Throughput; Install Floating Roof
on Tank No. 1

SPECIFIC CONDITIONS:

- 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).

FW.6. As requested by the permittee and in order to demonstrate compliance with the exemption from 40 CFR 63 Subpart R (NESHAP for Gasoline Distribution Facilities), the permittee shall: [40 CFR 63.420(d) and Permit 0570081-002-AC]

- A) Operate the facility such that none of the facility parameters used to calculate results under 40 CFR 63.420(a)(1) (see C) below) is exceeded in any rolling 30-day period; and
- B) Maintain records and provide reports in accordance with the provisions of 40 CFR 63.428(j) (see D) below)
- C) Document and record that the result, E_T , of the following equation is less than 1:

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

where:

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

PERMITTEE:
Transmontaigne Product Services, Inc.

PERMIT/CERTIFICATION No.: 0570081-017-AC
PROJECT: Increase Gas Throughput; Install Floating Roof
on Tank No. 1

SPECIFIC CONDITIONS:

- $K = (4.5 \cdot 10^{-9})(EF + L)$ 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 .

D) Maintain the following records and reports which shall be made available for inspection upon request:

- i. The initial notification from December 16, 1996 with the calculated value of E_T .
- ii. Maintain a record of the calculations in 40 CFR 63.420(a)(1) including methods, procedures, and assumptions supporting the calculations for determining criteria in (1) above.
- iii. At any time following the notification required under (i) above, and prior to any of the parameters being exceeded, the permittee shall 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.

FW.7. The facility is subject to 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 by no later than January 10, 2011. [62-4.070(3), F.A.C., 40 CFR 63.11080]

FW.8. The facility is subject to 40 CFR 63, Subpart A – General Provisions and 40 CFR 60 Subpart A – General Provisions. [Rule 62-204.800, F.A.C., 40 CFR 63.1, and 40 CFR 60.1]

FW.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.]

FW.10. The permittee shall 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

PERMITTEE:
Transmontaigne Product Services, Inc.

PERMIT/CERTIFICATION No.: 0570081-017-AC
PROJECT: Increase Gas Throughput; Install Floating Roof
on Tank No. 1

SPECIFIC CONDITIONS:

Pollutant Emitting Facility", for the preceding calendar year. The AOR shall be submitted by April 1 of the following year. 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. 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 shall be calculated on 13 mg/liter.
- C) Any changes in the information contained in the permit application.

FW.11. 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

FW.12. 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

FW.13. 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.

PERMITTEE:
Transmontaigne Product Services, Inc.

PERMIT/CERTIFICATION No.: 0570081-017-AC
PROJECT: Increase Gas Throughput; Install Floating Roof
on Tank No. 1

SPECIFIC CONDITIONS:

- B) Installation or addition of any equipment which is a source of air pollution.
- C) The storage or handling of any products other those authorized by this permit.

FW.14. 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.]

FW.15. 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.]

FW.16. 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.]

FW.17. A minimum of two copies of a Title V air operating permit application shall be submitted to the Environmental Protection Commission of Hillsborough County within 60 days of completion of construction of the floating roof on Tank No. 1 or at least 180 days prior to the expiration date of this permit, whichever occurs first. [Rules 62-4.050(2) and 62-4.090, F.A.C.]

PERMITTEE:
Transmontaigne Product Services, Inc.

PERMIT/CERTIFICATION No.: 0570081-017-AC
PROJECT: Increase Gas Throughput; Install Floating Roof
on Tank No. 1

SPECIFIC CONDITIONS:

Section A. The following specific conditions apply to the following emission units:

EU No.	Description
002	Distillate Tank Group
005	Gasoline Tank Group

Enforceable Potential to Emit (PTE) Parameters

A.1. The following restrictions and limitations shall apply to the above emission units: [Rule 62-210.200(247) - PTE and 62-4.070(3), F.A.C.]

A) Gasoline Tank Group (EU No. 005):

- i) Maximum product throughput: 840,000,000 gallons per twelve consecutive month period
- ii) Allowable product storage: gasoline or lower vapor pressure product
- iii) 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.
- iv) There is no throughput limitation for the slop tank (Tank No. 201), but all the petroleum contact water stored must have been generated at this facility.

B) Distillate Tank Group (EU No. 002):

- i) Maximum product throughput: 300,000,000 gallons per twelve consecutive month period
- ii) Allowable product storage: distillate or lower vapor pressure product
- iii) Maximum average annual product true vapor pressure: 0.012 psia

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

- i) 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 the permit application which are used to quantify these emissions shall be allowed without prior authorization.
- ii) Valves, connectors, pump seals, open-ended lines and other components shall be maintained to minimize fugitive emissions.

D) Only the tank(s) described in each group are allowed to store the products listed.

E) All tanks shall be clearly identified by number.

F) Each tank shall be maintained to retain the structure, roof type, and color characteristics described in the application.

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- G) 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.
- H) 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)]

A.3. [Reserved]

Emission Limitations and Standards

A.4. Tank Nos. 1, 3, 4, and 6 are subject to RACT for Petroleum Liquid Storage Tanks with Internal Floating Roofs and 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:
 - i. 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,
 - ii. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof supports; and,
 - iii. 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 40 CFR 60 Subpart Ka and shall comply with the following: [Rules 62-204.800, F.A.C. and 40 CFR 60.113a(a)(2)]

A) 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

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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. 1, 5, 8 and 9 are subject to 40 CFR 60 Subpart Kb and shall comply with the following terms and conditions: [Rules 62-204.800 and 62-4.070(3), F.A.C.; 40 CFR 60.112b(a); and Permit No. 0570081-013-AC]

- A) 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

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- 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. 2, , and 201 (formerly 21) are subject to Rule 62-296.320,F.A.C. and shall comply with the following terms and conditions: [Rules 62-296.320(1) 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) and 62-4.070(3), F.A.C.]

- A) The permittee shall use good air pollution control practices to minimize emissions.
- B) Once per calendar month, during barge unloading of gasoline, the pipes, valves, fittings, and associated unloading equipment shall be inspected for leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. A written record of the problem and corrective actions implemented shall be maintained and shall be made available upon request.
- 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.

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Test Methods and Procedures

A.9. For Tank Nos. 1, 3, 4, and 6, the following test methods shall apply: [Rule 62-296.508(3), F.A.C.]

- 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.10. For Tank Nos. 1, 5, 8 and 9, the permittee shall comply with the following requirements: [Rule 62-204.800, F.A.C. and 40 CFR 60.113b]

- 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. [40 CFR 60.113b(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 40 CFR 60.115b(a)(3) (Specific Condition A.15). 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. [40 CFR 60.113b(a)(2)]
- C) For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B):
 - i. Visually inspect the vessel as specified in D) below at least every 5 years; or
 - ii. Visually inspect the vessel as specified in B) above
- 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

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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 the case of vessels conducting the annual visual inspection as specified in paragraphs 40 CFR 60.113b(a)(2) and (a)(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in paragraph 40 CFR 60.113b (a)(3)(i) of this section (Paragraph C above). [40 CFR 60.113b(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 40 CFR 60.113b.(a)(1) and (a)(4) (A) and D) above) to afford the EPC the opportunity to have an observer present. If the inspection required by 40 CFR 60.113b.(a)(4) (D) 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)]

Monitoring, Recordkeeping, and Reporting Requirements

A.11. 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 shall be made available upon request for inspection by the EPC, state, or federal agency for the most recent 5 year period: [40 CFR 60.115a, Rule 62-4.070(3), F.A.C., and Permit No. 0570081-013-AC]

- 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)
- H) Number of times each tank roof is landed on the tank support legs per 12 consecutive month period
- I) Number of times each tank is degassed per 12 consecutive month period

A.12. 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 and A.6. [Rule 62-4.070(3), F.A.C.]

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A.13. 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:

- D) Identification of any item out of compliance
- E) Any tank out of service for more than four (4) weeks.

A.14. Annual seal inspections required in Specific Condition No. A.10. 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. shall 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.15. For Tank Nos. 1, 5, 8 and 9, the permittee shall keep records and furnish reports as required by this Specific Condition . The owner or operator shall keep copies of all reports and records required by this condition for at least 5 years. [40 CFR 60.115b; and Rules 62-4.070(3) & 62-213.440(1)(b), F.A.C.]

- A) For Tank No. 1, furnish the EPC with a report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a)(1) and 40 CFR 60.113b(a)(1) (Specific Condition No. A.10.). This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3).
- B) Keep a record of each inspection performed as required by 40 CFR 60.113b(a)(1), (a)(2), (a)(3), and (a)(4) (Specific Condition No. A.10.) 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). [40 CFR 60.115b.(a)(2)]
- C) If any of the conditions described in 40 CFR 60.113b(a)(2) (Specific Condition A.10) are detected during the annual visual inspection required by 40 CFR 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. [40 CFR 60.115b.(a)(3)]

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D) After each inspection required by 40 CFR 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 40 CFR 60.113b(a)(3)(ii), a report shall be furnished to the EPC within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 60.112b(a)(1) or 40 CFR 60.113b(a)(3) and list each repair made. [40 CFR 60.115b.(a)(4)]

A.16. For Tank Nos. 1, 5, 8 and 9, the permittee shall keep the following records for at least 5 years: [40 CFR 60.116b 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 40 CFR 60.116b(f) (F) below), the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m³ 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 m³ but less than 151 m³ 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. [40 CFR 60.116b(c)]
- C) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. [40 CFR 60.116b(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 40 CFR 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.

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- iii. For other liquids, the vapor pressure:
 - a) May be obtained from standard reference texts, or
 - b) Determined by ASTM Method ASTM D2879-83, 96, or 97 (incorporated by reference-see 40 CFR 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: [40 CFR 60.116b(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 40 CFR 60.116b(e) (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 40 CFR 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 ASTM D2879-83, 96, or 97 (incorporated by reference-see 40 CFR 60.17); or
 - b) ASTM Method D323-82 or 94 2 (incorporated by reference-see 40 CFR 60.17); or
 - c) As measured by an appropriate method as approved by the Administrator.

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SPECIFIC CONDITIONS:

Section B. The following specific conditions apply to the following emission units:

EU No.	Description
001	Truck Loading Rack T/T

Enforceable Potential to Emit (PTE) Parameters

B.1. The maximum combined throughput of gasoline and ethanol through the Truck Loading Rack T/T #1 and #2 shall not exceed the following per any twelve consecutive month period: [Rules 62-4.070(3) and 62-210.200(247) - PTE, F.A.C.]

Product	Maximum Annual Throughput (gallons) when operating the VCU	Maximum Annual Throughput (gallons) when operating the Backup Flare	Maximum True Vapor Pressure of Liquid, psia
Gasoline and Ethanol	400,000,000	20,000,000	7.6

B.2. The maximum throughput of products through T/T #1 and #2 shall not exceed the following per any twelve consecutive month period: [Rules 62-4.070(3) and 62-210.200(247) - PTE, F.A.C.]

Product	Maximum Annual Throughput(gallons) when operating the VCU or the Backup Flare	Maximum True Vapor Pressure of Liquid, psia
Diesel	300,000,000	0.012
Additives	3,500,000	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 62-4.070(3) and 62-296.510(3), F.A.C. and 40 CFR 60.502(a)]

Emission Limitations and Standards

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 62-4.070(3) and 62-296.510, F.A.C., 40 CFR 60.502(b), and Permit Nos. 0570081-002-AC and 0570081-013-AC]

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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 62-4.070(3) and 62-296.510, F.A.C., 40 CFR 60.502(b), and Permit Nos. 0570081-002-AC and 0570081-013-AC]

B.6 The maximum potential VOC emissions for Truck Rack T/T #1 and #2 shall not exceed 44.8tons per twelve consecutive month period. [Rules 62-4.070(3) and 62-210.200(247) - PTE, F.A.C.]

B.7. The permittee shall comply with the following requirements of Subpart XX- Standards of Performance for Bulk Gasoline Terminals: [40 CFR 60.502 and Rule 62-204.800, F.A.C.]

- 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. [40 CFR 60.502(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)]
 - i. The permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) (Specific Condition No. B.13.) for each gasoline tank truck which is to be loaded at the affected facility.
 - ii. The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.
 - iii. The permittee shall cross-check each tank identification number obtained in paragraph ii. above with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.
 - iv. 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.
 - v. 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).

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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.19. 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 and Rule 62-4.070(3), F.A.C.]

- 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. [40 CFR 60.18(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. [40 CFR 60.18(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)]

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

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

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

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

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SPECIFIC CONDITIONS:

Test Methods and Procedures

B.9. Compliance with 40 CFR 60.502(b), (c) and Specific Condition Nos. B.4, B.5, 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 40 CFR 60, 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 submitting the operating permit renewal application 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. [40 CFR 60.18(f)(1) and Rule 62-4.070(3), F.A.C.]
- C) The net heating value of the gas being combusted shall be determined using methodology described in 40 CFR 60.18(f) for the Flare only. [40 CFR 60.18(f)]
- 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)]

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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 40 CFR 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 40 CFR 60.502(h) (Specific Condition B.7) as follows: [40 CFR 60.503(d)(1) and (2)]

- 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.

B.12. The permittee shall install, maintain and calibrate a monitoring system that continuously monitors and records the combustion chamber temperature of the VCU. [Rule 62-4.070(3), F.A.C.)

Recordkeeping and Reporting Requirements

B.13. The tank truck vapor tightness documentation required in 40 CFR 60.502(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) and (b)]

- A) Test Title: Gasoline Delivery Tank Pressure Test - EPA reference Method 27
- B) Tank owner and address
- C) Tank identification number
- D) Test location
- E) Date of test

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- F) Tester name and signature
- G) Witnessing inspector, if any: Name, signature and affiliation
- H) Test Results: Actual pressure change in 5 minutes, mm of water (average for 2 runs)

B.14. 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 Rule 62-4.070(3), F.A.C.]

- A) Date of inspection
- B) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak)
- C) Leak determination method
- D) Corrective action (date each leak repaired; reasons for repair interval in excess of 15 days)
- E) Inspector name and signature

B.15. The permittee shall keep documentation of all notifications required by 40 CFR 60.502(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 62-4.070(3), F.A.C.]

B.16. 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.17. 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.4., B.5. and B.6. The recordkeeping system shall contain the following information for each loading rack (T/T #1 and #2) and be made available for inspection upon request by the Environmental Protection Commission of Hillsborough County, state, or federal agency for the most recent 5 year period: [Rules 62-213.440(1)(b)2.b. and 62-4.070(3), F.A.C. and Permit Nos. 0570081-002-AC and 0570081-013-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 VOC Emissions (tons)
- F) Rolling cumulative 12 month total for items C) and E) above.

B.18. 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

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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.19. 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.]

Compliance Assurance Monitoring

B.20. 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 current TV operating permit. 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 and Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Richard D. Garrity, Ph.D.
Executive Director

