# STATEMENT OF BASIS

Title V Air Operation Permit Renewal
Permit No. 0570085-023-AV

## APPLICANT

The applicant for this project is Central Florida Pipeline, LLC. The applicant's responsible official and mailing address are: Clint Lonon, Central Florida Pipeline, LLC, 2101 GATX Dr., Tampa, Hillsborough County, Florida, 33605.

## FACILITY DESCRIPTION

Central Florida Pipeline is a bulk gasoline facility which stores and handles gasoline, jet fuel, diesel fuel, biodiesel fuel, ethanol, additives, and other volatile organic products (VOLs) in floating roof and fixed roof storage tanks. These products are delivered by either ship or railcar. The products are subsequently loaded into railcars, trucks, or barges for shipment offsite or can be transferred offsite via two pipelines. The operations at this facility include 45 permitted storage tanks; degassing of the storage tanks; a barge loading operation; four loading racks; a Vapor Recovery Unit (VRU); and an open flame flare unit (OFFU). The storage tanks (EUs 001, 002, 007, 008, 009, 013, and 015) include the gasoline floating roof group tanks, jet fuel group tanks, biodiesel group tanks, additive group tanks, PCW (Petroleum Contact Water) group tanks, ethanol group tanks, and miscellaneous group tanks. Each tank group is subject to various operating restrictions such as throughput, products stored, and product vapor pressure. The facility has four loading racks: Truck Loading Racks T/T Area Nos. 1, 2A, 3 and 7. Truck Loading Rack T/T Area No. 1 has one loading arm. Truck Loading Rack T/T Area No. 2A has four (4) loading arms. Truck Loading Racks T/T Area Nos. 1 and 2A are permitted to load biodiesel and other volatile organic products into trucks or railcars for shipment offsite. VOC emissions from the Truck Loading Racks T/T Area Nos. 1 and 2A are controlled using submerged filling techniques.

Truck Loading Rack T/T Area No. 3 has two (2) ethanol loading arms, three (3) jet fuel loading arms, and one (1) PCW loading arm to load products into trucks. Truck Loading Rack T/T Area No. 7 has five lanes. Lanes A, B and C each have eight (8) loading arms and Lanes D and E each have six (6) loading arms. Truck Loading Rack T/T Area No. 7 can load gasoline, ethanol, diesel, jet fuel, and PCW into trucks for shipment offsite.

Truck Loading Racks T/T Area No. 3 and T/T Area No. 7 are controlled by submerged filling and a Vapor Recovery Unit (VRU). The VRU, a Jordan Technologies, Model JT-100100-1500 Dry VRU, is equipped with a Continuous Emissions Monitoring System (CEMS) to monitor VOC emissions. The VRU is operated as the primary control device. The open flame flare unit (OFFU), a John Zink Company, Model GV-LH-8400-2 open flame, air assisted flare unit, is operated as a back-up unit. The OFFU is used when the VRU is down for maintenance or repair and periodically to ensure the OFFU remains operational. The VRU has two identical carbon adsorption beds. One bed recovers vapors from loading, while the other bed undergoes a regeneration cycle to desorb the collected hydrocarbons. The carbon beds alternate on a timed cycle approximately every 15 minutes. The vacuum pump extracts the rich hydrocarbon vapors from the carbon absorption vessels and sends them to an absorption tower. In the absorber, fresh gasoline is used over packing to contact the vapor and condense the hydrocarbons. Liquid gasoline is pumped from a storage tank to the skid with a supply pump and distributed over the absorber packing. Liquid gasoline, including the condensed hydrocarbons, is returned to a storage tank

using a return pump. During the absorption phase, a small stream of air and residual vapor exits the top of the absorption column and is recycled back into the carbon beds for adsorption.

In addition to being loaded into trucks, barges, and railcars, products can also be shipped offsite *via* pipeline to Central Florida Pipeline's Orlando Terminal. The 10" line carries jet and diesel fuel and continues from the Orlando Terminal to the Orlando International Airport. The 16" line carries gasoline, denatured ethanol, jet fuel, and diesel fuel. The Tampa Terminal, the Tampa Pump Station (located at the Tampa Terminal) and the Hemlock Pump Station (located at 1904 Hemlock St., Tampa, FL) are operated by Central Florida Pipeline and are subject to 40 CFR 63 Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. Because the Hemlock Pump Station is subject 40 CFR 63 Subpart BBBBBB, the equipment at the Hemlock Pump Station is included as part of this permit.

The Barge Loading Operation involves loading diesel fuel, jet fuel, biodiesel, additives, and other low volatile petroleum or organic liquids with a true vapor pressure equal to or less than 0.013 psia. VOC emissions from this operation are controlled using submerged filling techniques.

In addition, the facility is permitted to denature ethanol onsite. Neat ethanol (pure ethanol) is delivered by barge and small amounts of gasoline (typically between 1.99% and 2.49% as required by Federal regulation) are added to the ethanol to form denatured ethanol. A worst case of 5% gasoline has been established for the facility. The neat ethanol can be denatured in any of the tanks in the Ethanol Tank Group or in Tank Nos. 205 and 401. The denatured ethanol is then pumped to the Truck Loading Rack T/T Area No. 3 or Area No. 7 to be loaded into a truck or is pumped to Central Florida Pipeline's Orlando Terminal *via* the 16" pipeline.

Below is a description of the permitted emission units at the facility:

| E.U. ID No. | Brief Description | | | | |
|---|---|---|---|---|---|
| **-001** | **Gasoline Tank Group** | | | | |
| | | | Dimensions | | |
| Tank No. | Roof Type | Volume ($x\ 10^3$gal.) | Diameter x Height | Color | Regulation |
| 55-1 | EFR | 2,310 | 100' x 40' | White | 62-296.516, F.A.C. |
| 55-2 | EFR | 2,310 | 100' x 40' | White | 62-296.516, F.A.C. |
| 80-1 | EFR | 3,360 | 120' x 40' | White | NSPS, Subpart K |
| 80-2 | IFR | 3,360 | 112' x 45' | White | NSPS, Subpart Kb |
| 80-4 | IFR | 3,360 | 112' x 45' | White | NSPS, Subpart Kb |
| 80-5 | IFR | 3,360 | 112' x 45' | White | NSPS, Subpart Kb |
| 80-6 | IFR | 3,360 | 112' x 45' | White | NSPS, Subpart Kb |
| 80-7 | IFR | 3,360 | 112' x 45' | White | NSPS, Subpart Kb |
| 120-1 | IFR | 5,040 | 150' x 40' | White | NSPS, Subpart K |
| 120-2 | IFR | 5,040 | 150' x 40' | White | NSPS, Subpart K |
| 120-4 | IFR | 5,040 | 150' X 40' | White | NSPS, Subpart Kb |

**-002 Jet Fuel Tank Group**

| Tank No. | Roof Type | Volume (x $10^3$gal.) | Dimensions Diameter x Height | Color | Regulation |
|---|---|---|---|---|---|
| 40-1 | VFR | 1,680 | 85' x 40' | White | 62-296.320, F.A.C. |
| 42-1 | VFR | 1,764 | 97’ x 32’ | White | 62-296.320, F.A.C. |
| 42-2 | VFR | 1,764 | 97’ x 32’ | White | 62-296.320, F.A.C. |
| 42-3 | VFR | 1,764 | 97’ x 32’ | White | 62-296.320, F.A.C. |
| 42-4 | VFR | 1,764 | 97’ x 32’ | White | 62-296.320, F.A.C. |
| 70-1 | VFR | 2,940 | 112’ x 40’ | White | 62-296.320, F.A.C. |
| 70-2 | VFR | 2,940 | 112’ x 40’ | White | 62-296.320, F.A.C. |
| 80-3 | IFR | 3,360 | 112' x 45' | White | 62-296.320, F.A.C. |

**-007 Biodiesel/Diesel Tank Group**

| Tank No. | Roof Type | Volume (x $10^3$gal.) | Dimensions Diameter x Height | Color | Regulation |
|---|---|---|---|---|---|
| 10-3 | VFR | 420 | 40’ x 48’ | White | 62-296.320, F.A.C. |
| 10-4 | IFR | 420 | 40’ x 45’ | White | 62-296.320, F.A.C. |
| 15-1 | VFR | 630 | 48’ x 48’ | White | 62-296.320, F.A.C. |

**-008 Additive Tank Group**

| Tank No. | Roof Type | Volume (x $10^3$gal.) | Dimensions Diameter x Height | Color | Regulation |
|---|---|---|---|---|---|
| A-1 | VFR | 8 | 8’ x 21’ | White | 62-296.320, F.A.C. |
| A-3A | HFR | 7 | 11’ x 11’ | White | 62-296.320, F.A.C. |
| A-3B | HFR | 6.5 | 11’ x 10’ | White | 62-296.320, F.A.C. |
| A-3C | HFR | 6.5 | 11’ x 10’ | White | 62-296.320, F.A.C. |
| A-4 | HFR | 20 | 11’ x 31’ | White | 62-296.320, F.A.C. |
| A-10 | HFR | 8 | 8’ x 21’ | White | 62-296.320, F.A.C. |

Note: Tank A-3 is one tank with three compartments.

**-009 Petroleum Contact Water (PCW) Tank Group**

| Tank No. | Roof Type | Volume (x $10^3$gal.) | Dimensions Diameter x Height | Color | Regulation |
|---|---|---|---|---|---|
| 103* | HFR | 19.7 | 11’ x 31’ | White | 62-296.320, F.A.C. |
| 104* | HFR | 19.7 | 11’ x 31’ | White | 62-296.320, F.A.C. |
| 105* | HFR | 19.7 | 11’ x 31’ | White | 62-296.320, F.A.C. |
| 350 | VFR | 35 | 13' x 36' | White | 62-296.320, F.A.C. |
| 351 | VFR | 35 | 13' x 36' | White | 62-296.320, F.A.C. |
| 106* | HFR | 19.7 | 10.5’ x 31’ | White | 62-296.320, F.A.C. |
| 109* | HFR | 19.7 | 10.5’ x 31’ | White | 62-296.320, F.A.C. |

* Tanks 103, 104, 105, 106, and 109 are empty; however, they are still on site

**-013 Miscellaneous Products Tank Group**

| Tank No. | Roof Type | Volume (x $10^3$gal.) | Dimensions Diameter x Height | Color | Regulation |
|---|---|---|---|---|---|
| 401 | IFR | 420 | 46’ x 32’ | White | 62-296.508, F.A.C. |
| 101 | HFR | 20 | 11’ x 31’ | White | 62-296.508, F.A.C. |
| 102 | HFR | 20 | 11’ x 31’ | White | 62-296.508, F.A.C. |
| Surge | VFR | 10.5 | 10’ x 18’ | White | 62-296.508, F.A.C. |
| 205 | IFR | 98 | 24’ x 29’ | White | 62-296.508, F.A.C. |

**-015 Ethanol Tank Group**

| Tank No. | Roof Type | Volume (x $10^3$gal.) | Dimensions Diameter x Height | Color | Regulation |
|---|---|---|---|---|---|
| 10 | IFR | 630 | 60’ x 30’ | White | 62-296.320, F.A.C. |
| 10-1 | IFR | 420 | 40’ x 45’ | White | NSPS, Subpart Kb |
| 11 | IFR | 840 | 75’ x 27’ | White | 62-296.320, F.A.C. |
| 12 | IFR | 840 | 75’ x 27’ | White | 62-296.320, F.A.C. |
| 25-1 | IFR | 1,050 | 67' x 40' | White | 62-296.320, F.A.C. |
| 25-2 | IFR | 1,050 | 67' x 40' | White | 62-296.320, F.A.C. |
| 120-3 | IFR | 5,040 | 150’ X 40’ | White | NSPS, Subpart Kb |

Glossary
EFR - External Floating Roof
IFR - Internal Floating Roof (includes external floating roof tanks equipped with geodesic domes)
HFR - Horizontal Fixed Roof
VFR - Vertical Fixed Roof

**EU No. 014 - Barge Loading**

**EU No. 004 - Truck Loading Rack T/T Nos. 1 and 2A**

| Rack No. | Transport Vehicle | Regulation | Control Method |
|---|---|---|---|
| T/T Area # 1 | Truck or Railcar | 62-296.320, F.A.C. | Submerged Filling |
| T/T Area # 2A | Truck | 62-296.320, F.A.C. | Submerged Filling |

**EU No. 017 - Truck Loading Rack T/T Nos. 3 and 7**

| Rack No. | Transport Vehicle | Regulation | Control Method |
|---|---|---|---|
| T/T Area #3 | Truck | NSPS, Subpart XX<br>62-296.320, F.A.C. | Submerged Filling and Vapor Recovery Unit or Open Flame Air Assisted Flare |
| T/T Area # 7 | Truck | NSPS, Subpart XX<br>62-296.320, F.A.C. | Submerged Filling and Vapor Recovery Unit or Open Flame Air Assisted Flare |

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

**PROJECT DESCRIPTION**
The purpose of this permitting project is to renew the existing Title V permit for the above referenced facility.

**PROCESSING SCHEDULE AND RELATED DOCUMENTS**
Initial Title V Air Operation Permit issued August 25, 2000
Title V Air Operation Permit Administrative Correction issued June 13, 2001
Title V Air Operation Permit Revision issued January 29, 2002
Title V Air Operation Permit Revision issued August 26, 2004
Title V Air Operation Permit Renewal issued July 31, 2006
Title V Air Operation Permit Revision issued July 10, 2008
Title V Air Operation Permit Revision issued April 7, 2010
Application for Title V Operation Permit Renewal received December 14, 2010
Notice of Intent to Issue Air Permit issued March 14, 2011

**PRIMARY REGULATORY REQUIREMENTS**
Title III: The facility is not identified as a major source of hazardous air pollutants (HAP).

Title V: The facility is a Title V major source of air pollution in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

NSPS: The facility does operate units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.

NESHAP: The facility does operate units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.

CAIR: The facility is not subject to the Clean Air Interstate Rule (CAIR) set forth in Rule 62-296.470, F.A.C.

CAM: Compliance Assurance Monitoring (CAM) for VOC emissions applies to EU No. 017 - Truck Loading Rack T/T Nos. 3 and 7. The monitoring system that was installed on the VRU measures stack gas concentration but does not measure the stack gas flowrate and therefore, cannot be used to directly determine the VOC emissions from the stack. Because the emissions monitoring system installed on the VRU does not provide data either in units of the standard or correlated directly with the compliance limit, it cannot be considered a continuous compliance determination method as defined by 40 CFR 64.1. Therefore, the VRU is subject to CAM pursuant to 40 CFR 64.2(a). In addition, the Truck Loading Racks T/T Area No. 3 and T/T Area No. 7 are subject to CAM when the OFFU is operating.

The facility has one 175 HP Clarke fire pump, which is diesel-fired and was manufactured in 2007. The 175 HP Clarke fire pump is subject to 40 CFR 60 Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

The Truck Loading Racks T/T Area No. 3 and T/T Area No. 7 are subject to Rule 62-296.320, F.A.C. and 40 CFR 60 Subpart XX. Because the facility is not a major source of HAP emissions, it is not subject to 40 CFR 63 Subpart R – National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) or 40 CFR 63 Subpart EEEE – National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline). However, because the facility is classified as an area source bulk gasoline terminal for HAPS and because it is not subject to 40 CFR 63 Subpart R, it is subject to 40 CFR 63 Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

## PROJECT REVIEW

This permit incorporates Permit No. 0570085-022-AV which authorized the construction of a VRU and a new Additive Tank, and increased the product throughputs for all emissions units. This permit also renews the facility's TV operating permit. In addition, this permit has been reformatted to reflect the current permit style.

## CONCLUSION

This project renews the Title V air operation permit No. 0570085-021-AV, which was issued on April 7, 2010. This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210 and 62-213, F.A.C.