TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

TransMontaigne Product Services, Inc.
PO Box 5660
Denver, CO 80217-5660

TransMontaigne – Port Manatee Terminal

Facility ID No. 0810001

PROJECT

Project No. 0810001-019-AC
Application for Minor Air Construction Permit
Project Name: Storage Tank and Loading Rack Modifications

COUNTY

Manatee County, Florida

PERMITTING AUTHORITY

Florida Department of Environmental Protection
Air and Solid Waste Permitting
Southwest District Office
Temple Terrace, Florida 33637-0926

December 11, 2014

Prepared by Danny Stubbs

GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, F.A.C.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of this permit.

I. Facility Description:

This is a bulk petroleum product terminal which receives, stores and distributes gasoline (including aviation gasoline), ethanol and distillate products. Distillate products include high sulfur diesel fuel, low sulfur diesel fuel, Jet A, Kerosene, Biodiesel, TransMix, No. 6 fuel oil, asphalt, slop and other petroleum products with a vapor pressure of less than 1.5 psia. Storage tanks are filled from vessels by pipeline and trucks. Marine vessels can be back loaded with distillate. Butane is received by truck and injected directly from truck to gasoline tanks and is not stored onsite. Stored products are loaded into distribution trucks at the loading racks. This facility also operates boilers and hot oil heaters to heat stored products.

Note: This facility is subject to the requirements of 40 CFR 63, Subpart BBBBBB – National Emission Standards for Hazardous Air Pollutants for Source Categories: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities and Gasoline Dispensing Facilities, which is only enforced by the U.S. EPA until adopted by the State of Florida and is therefore not a part of these permits.

II. Project Description:

A. Applicant:
Paul Siler, Air Quality Compliance Manager
TransMontaigne Product Services, Inc.
PO Box 5660
Denver, CO 80217-5660

B. Professional Engineer:
Mr. Barry Andrews, P.E.
Antea Group
3855 Precision Drive, Suite 160
Loveland CO, 80538

C. Project Location:

This facility is located in Manatee County at 804 North Dock Street – Port Manatee in Palmetto, Florida.

D. Project Summary:

1. EU Nos. 001 and 002 Modifications - Specific conditions related to restricting the hours or operation of the boilers while using fuel oil will be removed. The hours of operation restrictions are not required because the boilers have an equivalent fuel oil throughput limitation that limits the potential to emit.
2. EU Nos. 007 and 010 Tank Modifications - Internal floating roofs will be installed on three existing fixed roof storage tanks that are currently a part of EU. No. 007 (i.e., Tank Nos. 104, 405 and 409). The modification will result in a reclassification of the three tanks from Non-NSPS tanks to NSPS tanks subject to 40 CFR 60, Subpart Kb. The modified tanks will be removed from EU No. 007 and added to EU No. 010.
3. EU Nos. 007, 009, 010, and 017 Storage Tank Throughputs – The storage tank annual combined throughputs limitations will be modified as follows:
   a. For gasoline/ethanol or lower vapor pressure products, the storage tank annual combined throughput limitation will be increased from 180,432,000 to 420,000,000 gallons/year.
   b. For Jet A or lower vapor pressure products, the storage tank annual combined throughput limitation will be increased from 253,512,000 to 350,000,000 gallons/year.
4. EU No. 008 Modifications – The Truck Loading Rack emissions unit will be modified as follows:
   a. The existing vapor combustion unit used to control VOC emissions in EU No. 008 will be replaced with a new unit. The existing Zeeco Model TFC-4500 Vapor Combustion Unit (VCU) will be replaced with a John Zinc VCU.
   b. The emissions unit description will be revised to reflect a modification to the Gasoline/Jet A/No. 2 fuel oil truck loading rack from 2 gasoline loading positions to 12 gasoline and 2 diesel loading positions.
   c. The loading rack annual throughput limitation for gasoline/ethanol will be increased from 151,200, 000 to 420,000,000 gallons/year.
   d. The loading rack annual throughput limitation for Jet A/No. 2 Fuel Oil will be decreased from 196,360,210 to 84,000,000 gallons/year.
5. Exempt Emissions Unit - A new 8,000 gallon gasoline additive tank will be installed. This tank will be exempt from permitting because it will have VOC potential emissions that are significantly below the permitting threshold specified in the Generic Emissions Unit Exemption, Rule 62-2190.300(b)1, F.A.C.
6. EU Nos. 001 & 002 – The specific condition that limits the two boilers to a combined total of 12,600 hours of operation per any consecutive 12-month period while burning fuel will be removed. Recordkeeping requirements associated with the hours of operation will also be removed.

   Note: Operation Permit No. 081001-016-AO includes two boiler restrictions (quantity of fuel oil consumed and hours of operation) that are essentially equivalent methods of limiting the potential to emit.

E. Application Information:

Application Received on: 11/24/2014
Application Complete on: 11/24/2014

III. Applicable State and Federal Regulations

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

Subject to:	**Y/N**	**Comments**
Rule 62-210.300, F.A.C. – Permits Required	Y	subject to general permitting requirements
Rule 62-212.400, F.A.C. - Prevention of Significant Deterioration	N	facility is not a PSD major source
Rule 62-296.320(4), F.A.C. - General Particulate Emission Limiting Standards	Y	Vehicular movement within the facility could be a source of unconfined particulate matter emissions
Rules 62-296.320(1) and (2), F.A.C. - General Pollutant Emission Limiting Standards (VOCs and Odor)	Y	facility stores and handles organic liquids (i.e., gasoline, ethanol, Jet A , diesel and other fules) and is a source of VOC and odors
Rule 62-296.401-418, F.A.C. - Stationary Source Emission Standards	N	there is no applicable source category
Rule 62-296.500, F.A.C. - Reasonably Available Control Technology (VOC)	N	Manatee County is not an air quality maintenance area for ozone
Rule 62-296.700, F.A.C. - Reasonably Available Control Technology (PM)	N	there is no applicable source category
Rule 62-204.800, F.A.C. - Standards of Performance for New Stationary Sources (NSPS)	Y	EU No. 009 is subject to 40 CFR 60, Subpart Ka EU No. 010 is subject to 40 CFR 60, Subpart Kb EU No. 017 is subject to 40 CFR 60, Subpart K EU No. 008 is subject to 40 CFR 60, Subpart XX
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants (NESHAPS – 40 CFR 61)	N	there is no applicable source category
Rule 62-204.800, F.A.C. National Emission Standard for Hazardous Air Pollutants for Source Categories a.k.a. MACT (NESHAPS –40 CFR 63)	N	there is no applicable source category
Chapter 62-213, F.A.C. - Operation Permits for Major Sources of Air Pollution	N	facility is a synthetic non-Title V source
Rule 62-297.310, F.A.C. - General Compliance Test Requirements, F.A.C.	Y	VOC emissions testing is required for EU No. 008 (Truck Loading Rack with VCU)

IV. Summary of Emissions

Pollutant	EU No. and brief description	Potential Emissions (tpy)	Allowable Emissions (tpy)
VOC	007 – 10 Non-NSPS Storage Tanks	91.3	91.3
	008 – Truck loading Rack with VCU		
	009 – 3 NSPS Subpart Ka Storahe Tanks		
	010 – 3 NSPS Subpart Kb Storage Tanks		
	017 – 1 NSPS Subpart K Storage Tank		
	Total	**91.3**	**91.3**
SO2	001 – Boiler No. 1 (north)	56.33	56.33
	002 – Boiler No. 2 (south)		
	013 – Hot Oil Heater No. 4 (south)		
	014 – Hot Oil Heater No. 5 (north)		
	Total	**56.33**	**56.33**
NOx	001 & 002 (combined)	32.4	n/a
	013 & 14 (combined)	12.8	n/a
	Total	**45.2**	**n/a**
CO	001 & 002 (combined)	8.8	n/a
	013 & 14 (combined)	7.0	n/a
	Total	**15.8**	**n/a**
PM/PM10	001& 002 (combined)	5.9	n/a
	013 & 14 (combined)	2.1	n/a
	Total	**8.0**	**n/a**

Notes:

1. *In addition to the VOC sources listed in the table above (i.e., EU nos. 007, 008, 009, 010 & 017), the facility includes several exempt tanks that are also VOC source. These tanks are listed in the construction permit under the section titled "Exempt Emissions Units/Activities" and based on the information provided in the application submitted on November 24, 2014, their combined VOC potential emissions are significantly below one ton per.*
2. *CO emissions for EU Nos. 001, 002, 013 & 014 were calculated using AP-42, Table 1.4-1 & 1.4-2 emissions factors and assumed that the boilers fired with natural gas operating 8.760 hours per year.*
3. *NOx and PM emissions for EU Nos. 001, 002, 013 & 014 were calculated using AP-42, Table 1.3-1 emissions factors and assumed the following:*
   a. *EU Nos. 001 & 002 boilers are fired with No. 6 fuel oil with maximum combined fuel oil usage of 1,075,972 gallons per year.*
   b. *EU Nos. 013 & 014 boiler are fired with No. 2 fuel oil with maximum combined fuel oil usage of 1,251,454 gallons per year.*

V. Conclusions

The emission limits proposed by the applicant will meet all of the requirements of Chapters 62-204 through 297, F.A.C.

The General and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

VI. Preliminary Determination

The Department makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. Additional details of this analysis may be obtained by contacting the project engineer at the Florida Department of Environmental Protection Air Resource Management, Southwest District 13051 North Telecom Parkway, Temple Terrace, Florida 33637-7600.

Pursuant to Section 403.087, Florida Statutes and Section 62-4.070, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).