

***GULF TERMINAL CORPORATION
122 SOUTH CENTER AVENUE
PANAMA CITY, FLORIDA 32401***

COPY

***ODOR CONTROL SYSTEM
OPERATION AND MAINTENANCE PLAN***

2010

REV. "1"

ODOR CONTROL SYSTEM OPERATION AND MAINTENANCE PLAN

(REV. "1")

1. THE TERMINAL MANAGER SHALL READ THROUGH THE ATTACHED PAGES TO BECOME FAMILIAR WITH THE CAUSES, CURES AND PROPER PROCEDURES TO AVOID OBJECTIONAL ODOR COMPLAINTS.

2. NO DIRECT HEAT WILL BE USED TO HEAT STORAGE TANKS, DAY TANKS, PROCESS TANKS OR WETTING TANKS.

3. STRICT ADHERANCE TO THE MAXIMUM *operational* PERMITTED TEMPERATURES SHALL BE MAINTAINED.

4. ATTENTION WILL BE GIVEN TO MAINTAINING STORAGE TANKS AT NO MORE THAN 250 DEGREES F. UNLESS IT IS REQUIRED TO BE USED AS A DAY TANK OR A TRANSFER INTO A DAY TANK OR INTO A WETTING TANK REQUIRES A HIGHER PERMITTED TEMPERATURE. IN NO CASE SHOULD A STORAGE TANK TEMPERATURE EXCEED 350 DEGREES F.

THE CONDENSING VENTS ON EACH STORAGE TANK AND DAY TANK WILL BE INSPECTED ANNUALLY TO ASSURE MAXIMUM OPERATING EFFICIENCY. A RECORD OF THESE INSPECTIONS WILL BE MAINTAINED AT THE TERMINAL. AN IMPORTANT PART OF AVOIDING OBJECTIONAL ODORS IS CONDENSING ANY VAPORS THAT ARE RELEASED FROM THE STORAGE AND DAY TANKS FROM THE PRODUCT HEATING PROCESS.

VAPORS RELEASED FROM THE TRUCK AND RAIL LOADING FACILITIES WILL BE REDUCED BY MINIMIZING THE LOADING TIME (APPROXIMATELY NINE MINUTES FOR TRUCKS AND TWENTY (20) MINUTES FOR RAILCARS) AND USING THE LOADING HATCH VAPOR CONTAINMENT SHIELDS ATTACHED EACH LOADING ARM DISCHARGE LINE. THE HATCH COVERS WILL BE CLOSED IMMEDIATELY AFTER THE LOADING HAS BEEN COMPLETED.

WHEN RECEIVING PRODUCT BY BARGE OR LOADING BARGES AT THE MARINE DOCK THE LOADING OR RECEIVING RATE SHALL NOT EXCEED 5, BBLS PER HOUR. PRODUCT WILL NOT BE RECEIVED INTO STORAGE TANKS AT A TEMPERATURE ABOVE 350 DEGREES F.

NEVER TRANSFER PRODUCT INTO ANY TANK THAT HAS ACTIVE HOT OIL COILS. THIS CAN RELEASE UNNECESSARY VAPORS WHEN THE PRODUCT COMES IN CONTACT WITH THE EXCESSIVELY HEATED COILS. THIS INSTRUCTION DOES NOT PRECLUDE PREHEATING OF COILS PRIOR TO A TRANSFER.

WHEN ADDING ANTI-STRIP ADDITIVE TO ASPHALT A PROCEDURE IS IN PLACE TO DETERMINE THE AMOUNT OF ADDITIVE REQUIRED PER LOAD.

10. WHENEVER PRACTICAL ONLY AD-here LOF 65-00 ANTI-STRIP WILL BE USED SINCE THIS PRODUCT PRODUCES VERY LITTLE FUMES OR SMOKE WHILE MIXING WITH HOT ASPHALT. ONLY WHEN A CUSTOMER HAS A SPECIFIC REQUIREMENT FOR AD-here 1500 TO MEET A PARTICULAR PROJECT SPECIFICATION WILL AD-here 1500 WILL BE ADDED AS THE ANTI-STRIP ADDITIVE.

IF IT IS DETERMINED THAT THE LISTED OPERATIONAL LIMITS ARE NOT SUFFICIENT TO AVOID OBJECTIONAL ODOR COMPLAINTS THE FOLLOWING MEASURES WILL BE INSTITUTED.

1. THE ROOT CAUSE OF THE OBJECTIONAL ODOR COMPLAINT WILL BE DETERMINED.
2. THE ROOT CAUSE, AS DETERMINED BY OUR INVESTIGATION, WILL BE ADDRESSED WITH THE BEST AVAILABLE CONTROL TECHNOLOGY (BACT). AN EXAMPLE OF THIS TECHNOLOGY THAT OFFERS EFFECTIVE RESULTS IS CHARCOAL UNITS. ANOTHER TECHNOLOGY MAY SERVE THIS PURPOSE MORE EFFICIENTLY.
3. AN ODOR NEUTRALIZING AGENT SUCH AS ARMAZ descent 0119 MAY BE ADDED TO THE TANK OR SOURCE PRODUCING THE OBJECTIONAL ODOR.

NOTE: ANY ACTION THAT IS REQUIRED WILL BE APPROVED BY DEP AS INDICATED IN AIR OPERATION PERMIT #0070045-009-AO.