



## Memorandum

## Florida Department of Environmental Protection

TO: Sandra F. Veazey *SV 8/15/01*

FROM: Bob Knight *[Signature]*

THROUGH: *ASA* Andy Allen

DATE: *8/13/01*

SUBJECT: Evaluation Summary for a renewal operating permit for Chevron Products Company, Panama City Terminal 0050056-007-AF, Bay County

We recommend issuing a renewal operating permit (FESOP) to Chevron Products Company for their Panama City Terminal.

### Process Description

This facility consists of a petroleum terminal consisting of storage tanks, loading rack and a vapor combustion unit. The terminal receives petroleum products by barge, stores the products in tanks, are then loads the products into tanker trucks for distribution.

### Pollution Control Equipment

Tanker truck loading emissions are controlled by a vapor combustion unit. High volatility product storage tanks are equipped with floating roofs.

### Environmental Impact

Airborne Contaminant Emitted	FAC Rule	Estimated Emissions	Allowable Emissions
VOC	62-204.800	88.3 TPY	35 mg/l from truck loading
VE	62-204.800		no visible emissions

### Applicable Rules & Regulations

This source is regulated in accordance 40 CFR 60, Subparts Kb, applicable to the storage tanks, and XX, applicable to the gasoline terminal.

### **Compliance Monitoring**

Annually for VE; once per permit cycle for VOCs.

### **Compliance History**

Prior settlement for operation of tank 66 in an unpermitted mode (high vol proucts).

### **Fee Summary**

This facility includes eight emission units, seven AO2C units @ \$750, and one AO2A @ \$1500 for a combined fee of \$6750. Chevron submitted \$5250 with this application, and requests that \$1500 submitted with withdrawn application 0050056-006-AO be applied.

Additional staff notes are attached.

rvk:rvk

Memo to File:

From: Bob Kriegel

Date: July 26, ~~August 13~~, 2001

Re: **Application for Renewal Operation Permit, Chevron Products Company,  
Panama City Terminal; Application no. 0050056-007-AO, Bay County**

Chevron Products Company applied July 20, 2001 for a renewal operation permit for their Panama City terminal.

The application included a check for \$5250, and Chevron requested that we apply \$1500 submitted with application 0050056-006-AO previously withdrawn to this application. Application 0050056-006-AO was to incorporate two emission units into the previous operating permit, and we suggested that these tanks be included in the operation permit with this renewal permit application. As such, the \$1500 should be applied and the submitted application fee is \$6750. This is appropriate for an application including seven AO2C emission units (minor source, no sample, @, \$750) and one AO2A (minor source stack sample @ \$1500).

Permit 0050056-002-AF was August 23, 1996 and issued September 23, 1996, included six emission units, and limited throughput to 146.24 MMgpy high vol products, and 28.76 MMgpy low vol products. VOC emissions were identified as 48.9 tons/year. This permit expires September 23, 2001. The emission units included:

- 001: VCU
- 002: Tanks 1, 67, 78, 84 (high volatility product storage, NSPS applicability not identified)
- 003: Tanks 25, 62, 63, 66 (low volatility product storage)
- 004: Tanks 17, 18, 20, 21, 95, & 96 (Miscellaneous tanks, additives, etc)
- 005: Oil/water separators 1 & 2, tank 3, and evaporator tank
- 006: Flanges/valves, pumps and tank truck leaks (fugitive emissions)

Permit 0050056-004-AC was issued January 17, 1996, and amended August 12, 1997 and June 9, 1998. This permit was actually the precursor to the operation permit, and included essentially similar conditions. Two additional tanks were included in emission unit 004 – tanks 22 and 23. This permit allowed upgrading tank 66 for high vol product service. Tank 66 has been upgraded and converted into high vol product service.

Permit 0050056-005-AC was noticed 2 July, 2001 and issued July 18, 2001. This permit allows an increased loading rack operating rate (96,000 gph), construction of an additional third truck loading rack, and increased annual throughput of both high vol product (to 325.76 MMgpy) and low vol product (to 57.49 MMgpy). Facility wide VOC emissions were increased to 88.3 tons per rolling twelve months.

Emission units identified in this construction permit include:

- 001 Loading rack and Vapor Combustion Unit
- 002 High volatility VOL (gasoline and aviation gasoline) storage tanks (tanks 01, 67, 78, 84)
- 003 Low volatility VOL (diesel and Jet A fuel) storage tanks (tanks 25, 62, 63)
- 004 Additive, slop, and flare drop out storage tanks (tanks 17, 18, 20- 23, 96)
- 005 Process storage tanks (tanks O/S 1, PT1, PT 2, Tank 2, Evap tank)
- 006 Fugitive emissions (flange, valve, pump, and tank truck leaks)
- 007 High volatility VOL storage tanks subject to NSPS (tank 66)
- 008 Other VOL storage tanks subject to NSPS (tank 14)

This is evidently the current configuration of the facility.

Application 0050056-006-AO was submitted June 29, 2001 with a \$1500 fee to include tanks 22, 23, and 66 in the facility operating permit (0050056-002-AV, expires September 23, 2001). This application included certification that these units were constructed in substantial accordance with the air construction permit. We suggested this application be withdrawn, and these issues simply included in the renewal operation permit application.

Chevron submitted application 0050056-007-AO by letter dated July 18, 2001. The letter notes that Chevron requests the increased loading and throughput limits included in the previous construction permit, and reviews the compliance status of tank 66 with applicable Subpart Kb requirements.

I talked to Lou Milkindt, Chevron (770 984-3016) and Jeremy Sagan, URS, 404 478-8710 July 26, 2001. I noted the current renewal operating permit application did not specifically include the certification required by the construction permit – although the previous application that was withdrawn did. I asked that the applicant review all of the conditions of the construction permit, and certify compliance accordingly; I advised that I felt the previously submitted construction certification could be incorporated into this application, but that we would require a specific letter to that effect. Sagan agreed to get us such a letter, which we received July 30, 2001.

Concerning the application:

Transmittal letter reviews status of tank with Kb requirements.

Enclosed table identifies all tanks in service; is consistent with EU breakout in CP.

#### Section 1. Application Information

Application signed by Paul Luper. Not identified by Title.

Eu's consistent with most recently issued construction permit.

Application fee based on Eus.

Section 11. Facility Information.

Location map, site plot plan attached.

Section 111. Emissions unit information.

Completed for each emission unit.

EU 001 – Tank Truck Loading Rack and Vapor Combustion Unit

Notes 96,000 gph; 325.76 MMgpy hi vol product, 57.49 MMgpy low vol product; 8760 hours/year.

Also notes that max inlet gas velocity to VCU is 24.9 ft/s, 855 scfm, with a minimum Btu content of 300 Btu/scf.

EU 002 – High Vol Storage Tanks not subject to NSPS.

Notes includes tanks 01, 67, 78, 84 with a storage capacity >42,000 gal and storing a product with a vapor pressure >1.5 psia.

Notes tanks 01, 67, 78 have internal floating roofs; tank 84, an external floating roof with a geodesic dome cover.

EU 003 – Low Vol Storage tanks not Subject to NSPS

Notes includes tanks 25, 62, and 63; are fixed roof tanks, storing product with a vapor pressure < 1.5 psia.

EU 004 – Additive, slop, and flare drop out storage tanks. Includes tanks 17, 18, 20, 21, 22, 23, and 96. Notes that all tanks are fixed roof tanks.

EU 005 – Process Storage Tanks. Includes tanks O/S 1, PT 1, PT 2, Tank 2, and Evap tank. O/S 1 is an above ground oil/water separator; PT1 and 2 are underground collection tanks for petroleum contaminated wastewater; tank 2 is for fire protection water storage; and the evaporation tank is the evaporation tank.

EU 006 – fugitive emissions. Includes fugitive emissions from piping components – flanges, pipes, etc.

EU 007 – Hi Vol storage tanks subject to NSPS. Includes tank 66. Internal floating roof with a product greater than 1.5 psia.

EU 008. Additive storage tank subject to NSPS. Fixed roof tank storing a petroleum product with a vapor pressure less than 1.5 psia.

I visited the facility August 9, 2001, and met with Terry Franklin, the terminal manager and Louis Milkint, the facility contact and regional manager. The facility appears generally well operated and maintained. Trucks were in the process of being loaded, and the VCU was in operation without any visible emissions. The tank configuration seemed consistent with the draft permit.

Photographs are attached.

Larry George, by email dated June 15, 2001 discussed public notice requirements for FESOPs. He notes that recently changed rule language is designed to give the permitting offices the ability to waive public notice nearly every renewal.

Recommend we proceed with issuance of a renewal operating permit, but should classify it as a FESOP (AF). It reflects the current terminal configuration, and includes applicable NSPS and other requirements. Since the previous permit was a FESOP, and the current emission and throughput limits were noticed and included in a construction permit, I believe we can simply proceed with a renewal FESOP.



①

LOADING RACK



②

PRODUCT LINE Hook ups;  
SKELLY PROBE



③

TANKS

④



SEWALL RECONSTRUCTION

**Storage Tank Emission Reduction Partnership Program**  
**List of Participating Tanks by State**  
**February 26, 2001**

State	Company Name	Facility Name	Address of Facility	Participating Tank #s for Each Facility	Date Final Controls Will Be Installed or Were Installed	Type of controls, if Known
Florida	Air Products and Chemicals, Inc.	Air Products and Chemicals, Inc. FLD008155673	4575 Hwy. 90 East Pace, Florida 32571	TK 53405 TK 53407 TK 53401B	May 31, 2002 May 31, 2002 May 31, 2002	Flexible Enclosure Flexible Enclosure Flexible Enclosure
Florida	Chevron Products Company **	Panama City Terminal FLD000611988	525 W. Beach Dr. Panama City, FL 32401	T-1 T-3 T-66 T-67 T-78 T-84	April 12, 2010 April 12, 2010 April 12, 2010 April 12, 2010 April 12, 2010 1998	Pole Sleeve system Pole Sleeve system Pole Sleeve system Pole Sleeve system Pole Sleeve system Cover on EFR

“\*\*” -- Indicates that Partnership Agreement has not yet been executed because EPA requested additional information.

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