



Environmental Protection and Growth Management Department
POLLUTION PREVENTION, REMEDIATION AND AIR QUALITY DIVISION – AIR QUALITY
One North University Drive, Suite 203, Plantation, Florida 33324

FINAL PERMIT

Permittee:

BP Products North America, Inc.
1180 Spangler Road
Fort Lauderdale
Broward County
Florida 33316

Permit No.: 0110051-014-AC

Project: Construction

Effective Date: 6/8/2012

Expiration Date: 6/8/2013

Plant Name and Location: BP Products North America Port Everglades Terminal is an existing bulk petroleum products and denatured ethanol terminal. The source consists of a North Tank Farm located at 1180 Spangler Road, Fort Lauderdale, Broward County; Latitude: 26° 05' 30" North and Longitude: 80° 07' 45" West; and a "South Tank Farm" located at 1000 SE 28th Street, Fort Lauderdale, Broward; Latitude: 26° 05' 27" North and Longitude: 80° 07' 45" West. The main office is located at the North Tank Farm.

Project Description: This permit is to replace the internal floating roof of existing Tank #7 located in the North Tank Farm. After construction authorized by this permit, Tank #7 will have an internal floating roof with a mechanical shoe primary seal. The roof of Tank #7 will be an aluminum pontoon roof with six foot wide sections which are gasketed and screwed together.

This permit also updates the fugitive emission sources (pump and valves) from the installation of four surge vessels at the loading rack.

In Accordance with: Application received April 13, 2012, the Notice of Intent issued on May 21, 2012 and published on May 24, 2012 in the Sun-Sentinel newspaper.

Statement of Basis: This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), Florida Administrative Code (F.A.C.) Rules 62-4 and 62-210 through 62-297 (permitting requirements) and Broward County Code, Chapter 27 (emission limitations) and in conformance with all existing regulations of the Florida Department of Environmental Protection (FDEP). 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 Broward County Pollution Prevention, Remediation and Air Quality Division (PPRAQD) and made a part hereof.

This permit is organized by the following sections.

- 1. Facility Description
- 2. General Conditions
- 3. Facility-wide Conditions
- 4. Emissions Unit Specific Conditions

Executed in Broward County, Florida

Daniela Banu

Daniela Banu
Air Quality Administrator

Broward County Pollution Prevention, Remediation and Air Quality Division

/SJ

Abbreviations

- BBBBBB: NESHAP for Area Source Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.
- CFR: Code of Federal Regulations
- DEFR: Domed External Floating Roof
- EU: Emission Unit
- F.A.C.: Florida Administrative Code
- F.S.: Florida Statutes
- HAP: Hazardous Air Pollutants
- IFR: Internal Floating Roof
- Kb: NSPS for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984
- NESHAP: National Emissions Standards for Hazardous Air Pollutants
- NSPS: New Source Performance Standards
- PPRAQD: Broward County Pollution Prevention, Remediation and Air Quality Division
- PSD: Prevention of Significant Deterioration
- PTE: Potential to Emit
- RACT: Rule 62-296.508 F.A.C.: Reasonably Available Control Technology
- VOC: Volatile Organic Compounds
- VRU: Vapor Recovery Units
- XX: NSPS Standards of Performance for Bulk Gasoline Terminals

1. FACILITY DESCRIPTION

The BP Port Everglades Terminal is a bulk petroleum storage terminal with a total storage capacity of approximately 24,942,005 gallons. The existing regulated EUs are:

<u>E.U. ID</u>	<u>Brief Description</u>
012	<i>Floating Roof Storage Tanks.</i> This emission unit consists of five internal floating roof gasoline storage tanks and two geodesic dome internal floating roof gasoline storage tanks.
015	<i>Fixed Roof Tanks.</i> There six fixed roof petroleum products storage tanks.
001	<i>Loading Rack.</i> This emission unit consists of a truck loading rack with four bays with a bay containing a denatured ethanol loading/ unloading skid, and two vapor recovery units.
013	<i>Piping and Equipment.</i> Fugitive sources associated with gasoline loading operations.

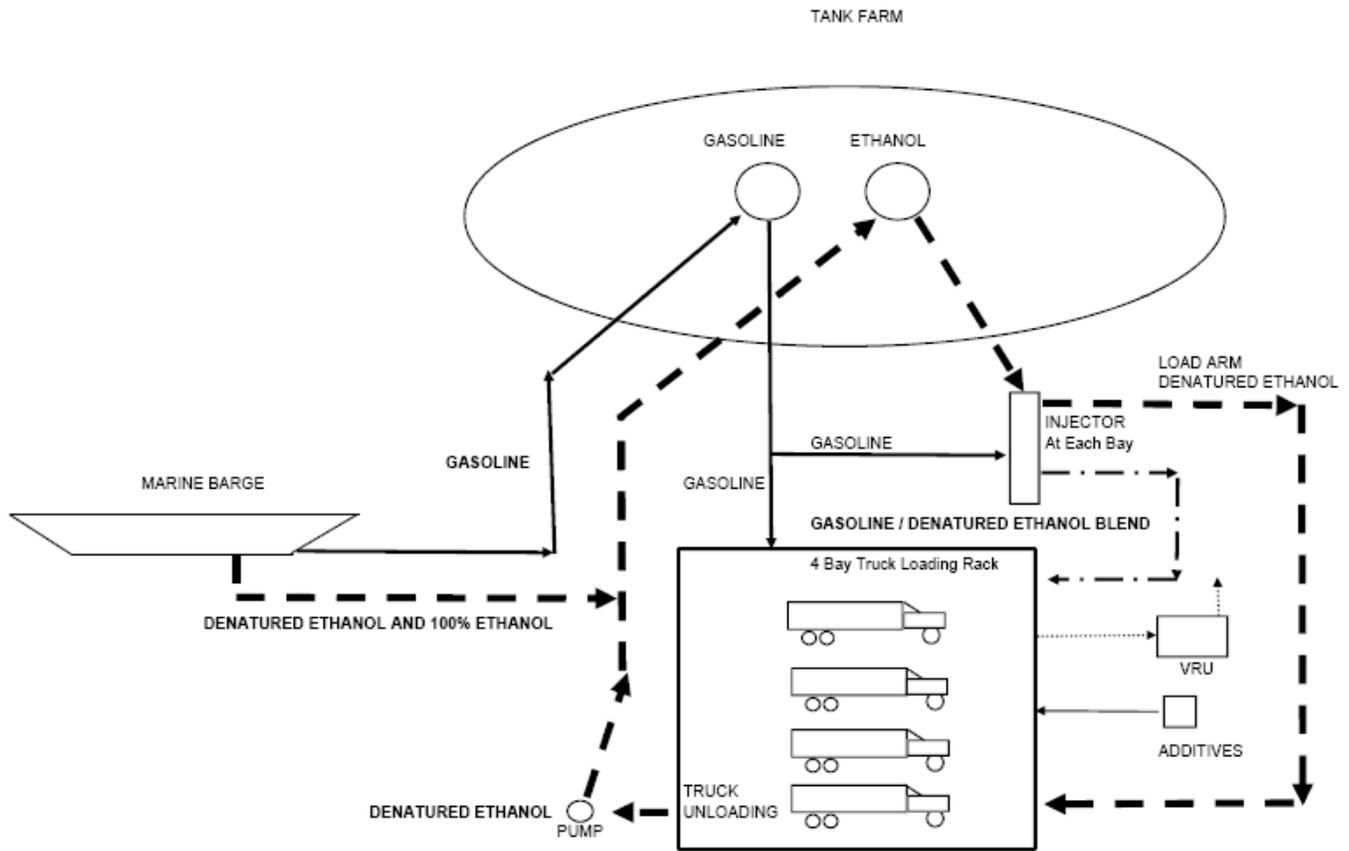
Facility Regulatory Classification

Title III: The facility is a synthetic minor source of HAP.

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

PSD: The facility is a synthetic minor source of VOC air pollutants under the PSD program

BP Port Everglades Terminal
Process Flow Diagram



2. GENERAL CONDITIONS

(Rule 62-4.160, F.A.C.)

1. Terms of Permit. The terms, conditions, requirements, limitations and restrictions set forth herein are accepted and must be completed by the Permittee and enforceable by the PPRAQD pursuant to this Code and Sections 403.141, 403.727, or 403.859 through 403.861 of the Florida Statutes (F.S.). The Permittee is placed on notice that PPRAQD will review this permit periodically and may initiate administrative and/or judicial action for any violation of the conditions by the Permittee, its agents, employees, servants or representatives.
2. Permit Validity. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the PPRAQD.
3. Disclaimer. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, or any violations of federal, state or local laws or regulations. This permit is not a waiver of or approval of any other permit that may be required for other aspects of the total project which are not addressed in this permit.
4. Disclaimer. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein

provided and the necessary title or leasehold interest have been obtained from the State of Florida. Only the Trustees of the Internal Improvement trust Fund may express State opinion as to title.

5. Liability. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and FDEP rule, unless specifically authorized by an order from the PPRAQD.
6. Operation and Maintenance. The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by county and state rules. This provision included the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by PPRAQD and FDEP rules.
7. Onsite Inspection Activities. The Permittee, by accepting this permit, specifically agrees to allow authorized PPRAQD personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times (depending on the nature of the concern being investigated), access to the premises where the permitted activity is located or conducted to:
 - (a) Have access to and copy any records that must be kept under conditions of the permit;
 - (b) Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
 - (c) Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or PPRAQD and FDEP rules.
8. Notice of Noncompliance. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide PPRAQD with the following information:
 - (a) A description of and cause of noncompliance; and
 - (b) The period of noncompliance, including dates and times, or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any enforcement action by PPRAQD for penalties or for revocation of this permit.
9. Evidence Materials. By accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted facility or activity, that are submitted to the PPRAQD, may be used by the PPRAQD as evidence in any enforcement proceeding arising under the Florida Statutes or F.A.C. rules, except where such use is prohibited by Section 403.111 and 403.73, Florida Statutes. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. Rule Changes. The Permittee agrees to comply with changes in Florida Department of Environmental Protection rules and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or DEP rules.
11. Permit Transfer. This permit is transferable only upon PPRAQD approval in accordance with Rule 62-4.120 and 62-730.300 F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer approved by the PPRAQD.
12. Work Site Copy. This permit or a copy thereof shall be kept at the work site of the permitted activity.
13. Miscellaneous Compliance Requirements. The Permittee shall comply with the following:
 - (a) Upon request, the Permittee shall furnish all records and plans required under DEP rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the PPRAQD.
 - (b) The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recording for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These

materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by PPRAQD rule.

- (c) Records of monitoring information shall include:
1. The date, exact place, and time of sampling or measurements;
 2. The person responsible for performing the sampling or measurements;
 3. The dates analyses were performed.
 4. The person responsible for performing the analyses;
 5. The analytical techniques or methods used;
 6. The results of such analyses.

14. Information Submittal. When requested by the PPRAQD, the Permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the PPRAQD, such facts or information shall be corrected promptly.
15. Reporting Noncompliance. The Permittee shall report any periods of noncompliance to the PPRAQD immediately by phone 954-519-1499 or by Email EPDHOTLINE@broward.org. This also applies when the period of non-compliance is first determined after normal business hours or on weekends and holidays.
16. Rules Adoption. Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, as amended, are adopted by Broward County Code, Sec. 27-173.

3. FACILITY-WIDE CONDITIONS

1. Capacity. The facility PTE air pollutants are synthetically limited to 173 TPY VOC and 17 TPY total HAPs (9 TPY of a single HAP), respectively.
[Rules 62-4.160(2), 62-210.200(PTE)]
{*Permitting Note. The PTE is an indicator of the extent of future modifications permitted before the source becomes a major PSD or HAP source. The major PSD and HAP thresholds are 250 TPY VOC and 25 TPY total HAPS (or 10 TPY of a single HAP), respectively*}
2. Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An “objectionable odor” means any odor present in the outdoor atmosphere which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.
[Rule 62-296.320(2) and 62-210.200 (Definitions), F.A.C.]
3. VOC or Organic Solvents Emissions. The owner or operator shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the PPRAQD.
[Rule 62-296.320(1) (a), F.A.C]
4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. This regulation does not impose a specific testing requirement.
[Rule 62-296.320(4) (b), F.A.C.]
5. (1) Circumvention. No person shall circumvent any air pollution device, or allow the emission of air pollutants without the applicable air pollution control device operating properly.
(2) Concealment. No person shall build, erect, install, or use any article, machine, equipment or other contrivance, the use of which will conceal any emission which would otherwise constitute a violation of

any provisions of Broward County Codes.

- (3) Maintenance. No person shall operate any air pollution control equipment or systems without proper and sufficient maintenance to assure compliance with Broward County Codes.

[Rule 62-210.650, F.A.C, Broward County Code, Sec. 27-175(b)]

- 6. Operating Permit Application. By this construction permit, the owner or operator is allowed to construct, operate, and conduct tests to determine compliance with the provisions of the permit, and to apply for and receive an operating permit prior to the expiration date of this construction permit. To properly apply for an operation permit the applicant shall submit the appropriate fee and certification that construction was completed noting any deviations from the conditions in the construction permit and test results where appropriate.

[Rules 62-4.210(3), and 62-4.220, F.A.C.]

- 7. Annual Operating Report (AOR). The AOR shall be submitted to the PPRAQD by April 1 of the following year. If the report is submitted using FDEP’s electronic annual operating report software (EAOR), there is no requirement to submit a copy to PPRAQD.

[Rule 62-210.370(3) (c), F.A.C.]

{Permitting Note. Information on the EAOR submittal is available at <http://www.dep.state.fl.us/air/emission/eaor/default.htm>}

4. EMISSIONS UNITS SPECIFIC CONDITIONS

Subsection A. Emissions Unit 014

<u>E.U. ID</u>	<u>Brief Description</u>
No. -014	Floating Roof Storage Tanks

EU-014 consists of IFR and DEFR Storage Tanks for Petroleum Products and Denatured Ethanol. After construction authorized by this permit, Tank #7 will have an internal floating roof with a mechanical shoe primary seal.

{Permitting Notes. All tanks of EU-014 are subject to Florida Reasonably Available Control Technology (RACT) Rule 62-296.508, F.A.C. for Petroleum Liquid Storage. Tanks Nos.10, 11, 12, and 13 are also subject to Rule 62-204.800 98) (b) 17, FAC which adopts NSPS 40 C.F.R. Part 60, Subpart Kb, volatile organic liquid storage vessels (including petroleum liquid storage vessels) for which construction, reconstruction, or modification commenced after July 23, 1984; except that the secretary is not the administrator for purposes of the authorities cited at 40 CFR 60.117b(b).}

{Permitting Notes. Tanks Nos. 7, 8, and 9 are also subject to subpart BBBBBB which is not adopted by Florida (i.e. only federally enforceable). Permitting notes on the subpart BBBBBB applicability are included in this State permit for information purposes only. The complete subpart BBBBBB requirements are listed in the source current federal Title V operating permit.}

{Permitting Note. Tanks No. 10, 11, 12, and 13 which are complying with the control requirements of NSPS Subpart Kb is deemed to be in compliance with the applicable requirements of the Subpart BBBBBB.}

Essential Potential to Emit (PTE) Parameters

- A.1. (a) Capacity. The tanks listed below have the following safe fill capacities:

<u>Tank No.</u>		<u>Capacity Gallons (cubic meters)</u>	<u>Primary Seal</u>	<u>Secondary Seal</u>
7	DEFR (New)	2,097,295(7,939)	Mechanical Shoe	None
8	DEFR	3,787,399(14,337)	Mechanical Shoe	Rim-mounted
9	IFR	1,680,656(6,362)	Mechanical Shoe	None

10	IFR	3,107,757 (11,764)	Mechanical Shoe	Rim-mounted
11	IFR	3,781,477(14,314)	Mechanical Shoe	Rim-mounted
12	IFR	3,781,477(14,314)	Mechanical Shoe	Rim-mounted
13	IFR	6,663,944(25,226)	Mechanical Shoe	Rim-mounted

- (b) Throughput. The throughput shall not exceed 750,000,000 gallons per year of petroleum products and denatured ethanol, calculated on a twelve-month rolling total basis.
- (c) PTE. The air pollutants PTE for EU-014 are 33.3 TPY VOC and 3.1 TPY total HAPs. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.]

Emission Limitations and Standards

A.2. Design Requirements for All Tanks (RACT).

- (1) Applicability. The true vapor pressure of products stored in the floating roof storage tanks shall not exceed 11.0 psia (76 kilopascals) under actual storage conditions.
- (2) Control Technology. The IFR tanks shall comply with the following:
 - (a) The tanks have been retrofitted with an internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall, or have been retrofitted with an equally effective alternative control; and,
 - (b) The tanks are maintained such that there are no visible holes, tears, or other openings in the seal or any seal fabric or materials; and,
 - (c) 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 operational practices; and,
 - (ii) Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and,
 - (iii) Rim vents, if provided, are set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting.

[Rule 62-296.508, F.A.C.]

[Permitting Note. Subpart BBBB requires that Tanks Nos. 7, 8, and 9 be equipped with one of the following seal configurations: (A) A liquid-mounted seal, or (B) A mechanical shoe seal.]

A.3. Design Requirements for Tanks Nos.10, 11, 12, and 13 (NSPS).

- (i) The IFR 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 IFR 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) The IFR shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the IFR:
 - (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 IFR.* The lower seal may be vapor-mounted, but both must be continuous.
 - (C) *A mechanical shoe seal which consists of a metal sheet that is 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 non-contact IFR 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 IFR except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be 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 IFR is not floating or at the manufacturer's recommended setting.
 - (vii) Each penetration of the IFR for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
 - (viii) Each penetration of the IFR 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 IFR that allows for passage of a ladder shall have a gasketed sliding cover.
- [40 CFR 60.112b (a) (1)]

Test Methods and Procedures

A.4. Inspections for All Tanks (RACT). Prior to initial filling of any storage vessel in EU 014 and at least once per year, the owner or operator shall inspect each IFR using EPA 450/2-77-036 p. 6-2 methodology to determine compliance with the requirements listed in Condition A.2. The owner or operator shall also conduct a complete inspection of the seals and covers whenever the tanks are emptied for non-operational reasons (e.g. maintenance.).
[Rules 62-296.508(3) (a), and 62-4.070(3) F.A.C]

A.5. Inspection Requirements for Tanks Nos.10, 11, 12, and 13 (NSPS).

- (1) *Prior to initial fill.* Visually inspect the IFR, the primary seal, and the secondary seal, prior to filling the storage vessel with Volatile Organic Liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the IFR, or both, the owner or operator shall repair the items before filling the storage vessel.
- (2) *Inspection at least once every 12 months after initial fill.* Visually inspect the IFR and the primary seal or the secondary seal through manholes and roof hatches on the fixed roof. 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 administrator in the inspection report required in Sec. 60.115b(a)(3). 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.
- (3) *For vessels equipped with a double-seal system (i.e. 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 IFR. The lower seal may be vapor-mounted, but both must be continuous)*
 - (i) Visually inspect the vessel as specified in paragraph (a)(4) of this section at least every 5 years; or
 - (ii) Visually inspect the vessel as specified in paragraph (a)(2) of this section.
- (4) *Inspection at least every 10 years.* After the tank is emptied and degassed, visually inspect the IFR, the primary seal, the secondary seal, gaskets, slotted membranes and sleeves. If the IFR 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 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.

[40 CFR 60.113b(a)]

{Permitting Note: In accordance with a response from USEPA to BP Products, 40 CFR 60.113b (a) (4) does not require that tanks be taken out of service to do the inspection if the owner or operator can overcome the safety issues (confined space) while the tank is in service.}

Notifications, Records, and Reports

- A.6. General Notification, Recordkeeping and Reporting Requirements.** Tanks Nos. 10, 11, 12, and 13 are subject to the NSPS general notification, recordkeeping and reporting requirements listed in 40 CFR 60.7 and 60.19. [40 CFR 60.7 & 60.19]
{Permitting Note. Subpart BBBBBB requires that tanks Nos. 7, 8, and 9 comply with the applicable notification, recordkeeping and reporting requirements listed in Subpart BBBBBB and the general provisions notification requirements listed in 40 CFR 63.6(b)(5).}
- A.7. Inspection Notification for All Tanks (RACT).** The owner or operator shall notify PPRAQD, at least 15 days prior to the date on which each inspection (see Condition A.4) is to begin, of the date, time, and place of each such inspection, and the inspection contact person who will be responsible for coordinating and having such inspection conducted for the owner or operator.
[Rule 62-297.310(7) (a) 9, F.A.C.]
{Permitting Note. A 30 days notification to the USAEPA is required for Subpart BBBBBB tanks inspections.}
- A.8. Inspection Notification for Tank Nos.10, 11, 12 (NSPS)**
(Prior to the initial filling tanks after installing IFRs or refilling tanks after emptied and degassed)
The owner or operator shall notify the PPRAQD in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by 40 CFR 60.113 (a)(1) and (a)(4) (see Condition A.7) to afford the PPRAQD the opportunity to have an observer present. If the inspection required by 40 CFR 60.113 (a)(4) is not planned and the owner or operator could not have known about the inspection 30 days in advance or refilling the tank, the owner or operator shall notify the PPRAQD at least 7 days prior to the refilling 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 PPRAQD at least 7 days prior to the refilling.
[40 CFR 60.113b (a) (5)]
- A.9. Reporting Requirements for All Tanks (RACT).** The inspection report (see Condition A.4) shall be submitted to the PPRAQD as soon as practicable, but no later than 45 days after the last test is completed.
The report shall provide sufficient detail on the tanks inspected and the inspection procedures used to allow PPRAQD to determine if the inspection was properly conducted.
[Rule 62-297.310(8) (a) & (b), 62-297.310(8) (c), and 62-4.070(3) F.A.C]
- A.10. Reporting for Tank Nos.10, 11, and 12 (NSPS).** The owner or operator shall keep records and furnish reports as required by paragraphs (a) of this section. The owner or operator shall keep copies of all reports and records required by paragraphs (a) of this section, for at least 2 years.
- (a) After installing control equipment in accordance with §60.112b (a) (1) (see Condition A.3), the owner or operator shall meet the following requirements.
- (1) Furnish the PPRAQD with a report that describes the IFR and certifies that the IFR meets the specifications of 40 CRF 60.112b (a) (1) (see Condition A.3) and 40 CFR 60.113b (a) (1) (see Condition A.5). This report shall be an attachment to the notification required by 40 CFR 60.7(a) (3).
 - (2) Keep a record of each inspection performed as required by 40 CFR 60.113b (a) (1), (a) (2), and (a) (4) (see Condition A.5). Each record shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, IFR, and fittings).
 - (3) If any of the conditions described in 40 CFR 60.113b (a) (2) ((see Condition A.5), are detected during the annual visual inspection required by 40 CFR 60.113b (a) (2), a report shall be furnished

to the PPRAQD 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)]

A.11. Recordkeeping for all Tanks (RACT). Inspection records (see Condition A.4) shall be maintained at the terminal for at least 5 years and be made available to PPRAQD upon request.

[Rule 62-297.440(2) (b) 1.a, F.A.C.]

{Permitting Note. SubpartBBBBB requires that Tanks Nos. 7, 8, and 9 inspection records be kept for 5 years. The owner or operator is also required to keep a record of the date when a floating roof is set on its legs or other support devices, and the date when the roof was refloated. The record will indicate whether the process of refloating was continuous.}

{Permitting Note. SubpartBBBBB allows Tanks Nos. 7, 8, and 9 inspection records to be kept in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche. SubpartBBBBB also specifies the information required depending on the outcome of the inspection.}

A.12. Recordkeeping Requirements for Tank Nos.10, 11, and 12 (NSPS).

- (a) The owner or operator shall keep copies of all records required by this section, except for the record required by paragraph (b) of this section, for at least 2 years. The record required by paragraph (b) of this section will be kept for the life of the source.
- (b) The owner or operator shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
- (c) The owner or operator shall maintain a record of the volatile organic liquid (VOL) stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
- (d) 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 that is normally less than 5.2 kPa shall notify the PPRAQD within 30 days when the maximum true vapor pressure of the liquid exceeds the maximum true vapor pressure value..
- (e) Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below:
 - (1) 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.
 - (2) For refined petroleum products the vapor pressure may be obtained by the following:
 - (i) 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 PPRAQD specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
 - (3) For other liquids, the vapor pressure:
 - (i) May be obtained from standard reference texts, or
 - (ii) Determined by ASTM Method D2879-83 (incorporated by reference - see 40 CFR 60.17); or
 - (iii) Measured by an appropriate method approved by the PPRAQD; or
 - (iv) Calculated by an appropriate method approved by the PPRAQD.

[40 CFR 60.116b]

- A.13. Throughput Records.** The owner or operator shall keep records of petroleum products and denatured ethanol total throughputs for the previous twelve (12) months (i.e. a rolling 12 month total basis).
[Rule 62-4.070(3) F.A.C.]

Subsection B. Emissions Unit 013

<u>E.U. ID No.</u>	<u>Brief Description</u>
-013	Piping and Equipment

This emission unit consists of piping and equipment in the vapor collection and control system associated with gasoline loading, and ethanol blending. The vapor collection system includes all piping, seals, hoses, connections, pressure-vacuum vents, and other possible leak sources between the truck and the vapor processing unit and/or the storage tanks and vapor holder. The vapor control system includes any piping, hoses, and devices at the bulk terminal which is used to collect, store, and/or process gasoline vapors.

The number of pumps and valves in EU-013 was increased from 1606 to 1618 during the October 2011 installation of four surge vessels at the loading rack.

{Permitting Note. This emission unit is regulated under Rule 62-297.440 F.A.C Supplementary Test Procedures at Gasoline Bulk Terminals; and Rule 62-204.800 98) (b) 55, FAC which adopts NSPS 40 C.F.R. Part 60, Subpart XX, Bulk Gasoline Terminals; amended December 19, 2003, at 68 FR 70959; except that the Secretary is not the Administrator for the purposes of 40 C.F.R. § 60.502(e)(6).}

{Permitting Notes. EU-013 is also subject to subpart BBBBBB which is not adopted by Florida (i.e. only federally enforceable). Subpart BBBBBB requirements are listed in the source current federal Title V operating permit.}

Essential Potential to Emit (PTE) Parameters

- B.1. Capacity.** EU-013 fugitive emissions from tank trucks and vapor collection systems are 41.1 TPY VOC and 4.1 TPY total HAPs.
[Rules 62-4.160(2), 62-210.200(PTE)]

Standards and Procedures

- B.2. Vapor Tight Fittings.** No person shall load gasoline or denatured ethanol into any tank, trucks, or trailers from any bulk gasoline terminal unless all loading and vapor lines equipped with fittings are vapor tight
[Rule 62-296.510 (3) (c)]
- B.3. Leak Standard.** During loading or unloading operations, there shall be no reading greater than or equal to 100 percent of the lower explosive level (LEL), measured as propane at 1 inch around the perimeter of a potential leak source as detected by a combustible gas detector using the procedure described in “Control of Volatile Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems”, EPA 450/2-78-051, Appendix B.
[Rule 62-297.440(2) (b) 2.a., F.A.C.]
{Permitting Note. This leak standard is used demonstrate compliance with Condition B.2 when using a combustible gas detector.}
{Permitting Note. When monitoring for leakage of vapor using EPA Method 21, NSPS threshold for leak repair is 10,000 ppm (as methane), and BBBBBB threshold is 500 ppm.}
{Permitting Note. EPA 450/2-78-051 recommends that the owner or operator keep records for two years indicating the last time the vapor collection system pass the leak standard requirements, and identifying points where the VOC leakage exceed the leak standard.}
- B.4. Leak Inspections – NSPS.** 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 purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each leak detection shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.
[40 CFR 60.502 (j)]

{Permitting Note. Subpart BBBBBB also requires that an initial attempt at leak repair after detection be made as soon as practicable, but no later than 5 calendar days after the leak is detected.}

{Permitting Note. The log of leak repairs is retained in MAXIMO a Computerized Maintenance Management System (CMMS). Subpart BBBBBB specifies the required leak information that should be kept in the log.}

Notifications, Recordkeeping, and Reporting Requirements

B.5. General Notification, Recordkeeping and Reporting Requirements. Emission unit (EU) 013 is subject to the NSPS general notification, recordkeeping and reporting requirements listed in 40 CFR 60.7 and 60.19.

[40 CFR 60.7 & 60.19]

{Permitting Note. The owner or operator is also required to maintain leak inspections records in accordance with the requirements listed in Subpart BBBBBB.}

B.6. Leak Records - NSPS.

(a) (b) [Blank]

(c) *Leak Inspection Report.* A record of each monthly leak inspection of the vapor collection system, vapor processing system and loading racks required under 40 CFR 60.502(j) (see Condition B.4) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information:

- (1) Date of inspection.
- (2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
- (3) Leak determination method.
- (4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
- (5) Inspector name and signature.

(d) [Blank]

(e) *Alternative to keeping records at the terminal.* The owner or operator may comply with the requirements in either paragraph (e)(1) of this section.

(1) An electronic copy of each record is instantly available at the terminal.

- (i) The copy of each record in paragraph (e) (1) of this section is an exact duplicate image of the original paper record with certifying signatures.
- (ii) The permitting authority is notified in writing that each terminal using this alternative is in compliance with paragraph (e) (1) of this section.

(f) *Replacements or additions of components.* The owner or operator of an affected facility shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.

[40 CFR 60.505 (c), (e) & (f)]