FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

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GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

Sent by Electronic Mail – Received Receipt Requested

PERMITTEE

Center Point Terminal Company, LLC
8235 Forsyth Blvd., Suite 400
Clayton, Missouri 63105

Authorized Representative:
Mr. Ken Fenton, Chief Operating Officer

Final Air Permit No. 0310562-007-AC
Permit Expires:
December 15, 2015

Jacksonville North
Air Construction Permit
New Vapor Recovery Unit (VRU)

This is the final air construction permit, which authorizes the installation of a carbon bed adsorption/absorption vapor recovery unit (VRU) at the EU002 South Tank Farm. The existing vapor combustion unit (VCU) will remain and serve as the backup vapor control device. The South Tank Farm VRU (EU002) will also serve as the backup vapor control device for the North Tank Farm's VRU (EU003), during these times the EU002 emissions shall be routed to the VCU. This project also increases the annual maximum product throughput for EU001 Fuel Storage Tanks Equipped with Floating Roof, and increases EU002 Truck Rack South Tank Farm maximum allowable throughput rate. The proposed work will be conducted at the Jacksonville North, which is a Petroleum Bulk Station and Terminal (Standard Industrial Classification No. 5171). The facility is located in Duval County at 3101 Talleyrand Ave, Jacksonville, Florida. The UTM coordinates are: Zone 17, 440 East and 3359 North. Latitude is: 30^0 21' 27" North; and, Longitude is: 81^0 37' 25" West.

This final permit is organized by the following sections.

Section 1. General Information

Section 2. Administrative Requirements

Section 3. Emissions Unit Specific Conditions

Section 4. Appendices

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of Section 4 of this permit.

This air pollution construction permit is issued under the provisions of: Chapter 403 of the Florida Statutes (F.S.) and Chapters 62-4, 62-204, 62-210, 62-212, 62-296 and 62-297 of the Florida Administrative Code (F.A.C.). The permittee is authorized to conduct the proposed work in accordance with the conditions of this permit. This project is subject to the general preconstruction review requirements in Rule 62-212.300, F.A.C. and is not subject to the preconstruction review requirements for major stationary sources in Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68 of the Florida Statutes by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida, 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Jacksonville, Florida

Richard S. Rachal III, P.G.
Program Administrator
Permitting Program

FILING AND ACKNOWLEDGEMENT & CERTIFICATE OF SERVICE

Filed on this date pursuant to § 120.52, Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged. The undersigned hereby certifies that this Construction permit and all copies were sent before the close of business on June 15, 2015 to the listed persons.

Leslie Maybin June 15, 2015
Clerk Date

Mr. Ken Fenton, Chief Operating Officer - Apex Oil Company (kfenton@worldpointlp.com)
Mr. Bernie Sheil, Compliance Manager – Apex Oil Company (bsheil@apexoil.com)
Mr. Charlie Bowden - Center Point Terminal Company (cbowdengrn@gmail.com)
Anthony Hoffman, P.E. - Gannett Fleming Inc. (axhoffman@gfnet.com)

FACILITY AND PROJECT DESCRIPTION

Existing Facility

This facility is a Petroleum Bulk Station and Terminal that consists of Fuel Storage Tanks. Fuel products will be unloaded from barges, ships, rail cars and tankers to the fuel storage tanks. The various fuels include gasoline (all types), gasoline blends, ethanol, aviation fuels, distillate fuel oils including biodiesel, and/ or other non-petroleum products.

This facility also has two (2) Truck Rack Tank Farms that are equipped with blending equipment and related piping for ethanol blending with gasoline. Additional equipment for the injection of fuel additives (gasoline and diesel additives, and red dye) will be operated at both truck racks.

There are Floating Roof Storage Tanks that will manage various fuels including gasoline (all types), gasoline blends, ethanol, aviation fuels, distillate fuel oils including biodiesel, and/ or other non-petroleum products. The existing facility consists of the following emissions units.

EU No.	Brief Description
Regulated Emissions Units	
001	Fuel Storage Tanks Equipped with Floating Roof
002	Truck Rack South Tank Farm
003	Truck Rack North Tank Farm
004	Leaks for Equipment Components
005	Emergency Engines
Unregulated Emissions Units and Activities	
xxx	Fixed Roof Storage Tanks (capacity < 42,000 gallons) Additives and transmix

Proposed Project

Air construction permit, which authorizes the installation of a carbon bed adsorption/absorption vapor recovery unit (VRU) at the EU002 South Tank Farm. The existing vapor combustion unit (VCU) will remain and serve as the backup vapor control device. The South Tank Farm VRU (EU002) will also serve as the backup vapor control device for the North Tank Farm's VRU (EU003), during these times the EU002 emissions shall be routed to the VCU. This project also increases the annual maximum product throughput for EU001 Fuel Storage Tanks Equipped with Floating Roof, and increases EU002 Truck Rack South Tank Farm maximum allowable throughput rate.

This project will modify the following emissions units.

Facility ID No. 0310562

ID No.	Emission Unit Description
001	Fuel Storage Tanks Equipped with Floating Roof
002	Truck Rack South Tank Farm
003	Truck Rack North Tank Farm

FACILITY REGULATORY CLASSIFICATION

- The facility **is not** a major source of hazardous air pollutants (HAP).
- The facility **has no** units subject to the acid rain provisions of the Clean Air Act (CAA).
- The facility **is** a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility **is not** a major stationary source in accordance with Rule 62-212.400(PSD), F.A.C.

SECTION 2. ADMINISTRATIVE REQUIREMENTS (FINAL)

1. Permitting Authority: The permitting authority for this project is the Florida Department of Environmental Protection (Department), Northeast District Office, Permitting Program. The Northeast District Office's mailing address is 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256. All documents related to applications for permits to operate an emissions unit shall be submitted to the Northeast District Office.
2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the Northeast District Office, Compliance Assurance. The mailing address and phone number of the Northeast District Office is: 8800 Baymeadows Way West, Suite 100, Jacksonville, Florida 32256 and Phone Number 904) 256-1700.
3. Combined Appendices: The following Appendices are included in the Combined attached Appendices as part of this permit:
   a. Appendix A. Citation Formats and Glossary of Common Terms;
   b. Appendix B. General Conditions;
   c. Appendix C. Common Conditions; and
   d. Appendix D. Common Testing Requirements.
4. Appendices: The following Appendices are attached as part of this permit:
   a. Appendix 40 CFR 60, Subpart A, NSPS General Provisions.
   b. Appendix 40 CFR 63 Subpart A – General Provision.
   c. Appendix. 40 CFR 60 Subpart XX.
   d. Appendix 40 CFR 63 Subpart BBBBBB.
   e. Appendix 40 CFR 60 NSPS, Kb.
5. Applicable Regulations, Forms and Application Procedures: Unless otherwise specified in this permit, the construction and operation of the subject emissions units shall be in accordance with the capacities and specifications stated in the application. The facility is subject to all applicable provisions of: Chapter 403, F.S.; and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296 and 62-297, F.A.C. Issuance of this permit does not relieve the permittee from compliance with any applicable federal, state, or local permitting or regulations.
6. New or Additional Conditions: For good cause shown and after notice and an administrative hearing, if requested, the Department may require the permittee to conform to new or additional conditions. The Department shall allow the permittee a reasonable time to conform to the new or additional conditions, and on application of the permittee, the Department may grant additional time. [Rule 62-4.080, F.A.C.]
7. Modifications: The permittee shall notify the Compliance Authority upon commencement of construction. No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Department. Such permit shall be obtained prior to beginning construction or modification. [Rules 62-210.300(1) and 62-212.300(1)(a), F.A.C.]

8. Source Obligation:

   (a) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   (b) At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), F.A.C., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

   [Rule 62-212.400(12), F.A.C.]

A. EU001 Fuel Storage Tanks Equipped with Floating Roof

This section of the permit addresses the following emissions unit.

EU No.	Brief Description				
001	Fuel Storage Tanks Equipped with Floating Roof				
Tank No	**Tank Location**	**6Bs**	**RACT**	**Roof Type**	**Capacity (Gals)**
57	North Tank Farm	x	x	Interior Floating Roof	1,146.173
58	North Tank Farm	x	x	Interior Floating Roof	1,534,242
59*	North Tank Farm	---	x	Interior Floating Roof	381,066
60*	North Tank Farm	---	x	Interior Floating Roof	380,246
62****	North Tank Farm	x	x	----	195,944
66	North Tank Farm	x	x	Interior Floating Roof	1,553,922
67	North Tank Farm	x	x	Interior Floating Roof	1,537,717
71	North Tank Farm	x	x	Interior Floating Roof	1,842,687
72	North Tank Farm	x	x	Interior Floating Roof	1,824,521
73	North Tank Farm	x	x	Interior Floating Roof	1,891,336
82**	North Tank Farm	x	x	Interior Floating Roof	2,006,036
83***	North Tank Farm	---	x	Interior Floating Roof	1,915,462

* May store Ethanol ** Storing Gasoline or Aviation Gasoline
*** Storing Diesel Fuel
**** Interior Floating Roof removed. No longer stores Gasoline. Currently stores petroleum contact water (PCW), but the tank is not limited to that usage.
{PERMITTING NOTE: Since all of the tanks in EU001 have IFR (except 62) and are capable of storing gasoline, they have the flexibility to store any fuel.}

Control Device(s) - Internal Floating Roofs **North Tank Farm**

Fuel Storage Tanks equipped with floating roofs. Various fuels will be stored in these vessels to include
Control device description- Internal floating roof with mechanical shoe seal on each vessel.}

A. EU001 Fuel Storage Tanks Equipped with Floating Roof

Continued:

{These EPs are regulated (as indicated in the Table above) under RACT Rule 62-296.508, F.A.C.- Petroleum Liquid Storage, Rule 2.1301, JEPB, 40 CFR 63, Subpart BBBBBB and 40 CFR 63, Subpart A NESHAP-General Provisions}

Tank No.	Tank Location	6Bs	Kb	Roof Type	Capacity (Gals) and (bbl)
81-1	South Tank Farm	x	x	Interior Floating Roof	3,415,104 (gals) 81,312 (bbl)
27-2	South Tank Farm	x	x	Interior Floating Roof	1,150,338 (gals) 27,389 (bbls)
81-3	South Tank Farm	x	x	Interior Floating Roof	3,415,104 (gals) 81,312 (bbl)
81-4	South Tank Farm	x	x	Interior Floating Roof	3,415,104 (gals) 81,312 (bbl)
81-5	South Tank Farm	x	x	Interior Floating Roof	3,415,104 (gals) 81,312 (bbl)
81-6	South Tank Farm	x	x	Interior Floating Roof	3,415,104 (gals) 81,312 (bbl)
81-7	South Tank Farm	x	x	Interior Floating Roof	3,415,104 (gals) 81,312 (bbl)
81-8	South Tank Farm	x	x	Interior Floating Roof	3,415,104 (gals) 81,312 (bbl)
81-9	South Tank Farm	x	---	Interior Floating Roof	3,415,104 (gals) 81,312 (bbl)

Control Device(s) - Internal floating roof with mechanical shoe seal on each vessel **South Tank Farm**

{These EPs are regulated (as indicated in the Table above) under 40 CFR 60, Subpart Kb- Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

A.1. <u>Relation to Other Permits</u>. The conditions of this permit supplements all other previously issued air construction and operation permits for these emissions units. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, and the like.

[Rules 62-4.210, 62-4.030, and 62-210.300(1)(b), F.A.C.]

A. EU001 Fuel Storage Tanks Equipped with Floating Roof

PERFORMANCE RESTRICTIONS

A.2. **Hours of Operation (Total for all North and South Tanks).** This emission unit may operate continuously (8,760 hours/year).

[Rule 62-210.200(PTE), F.A.C., Rule 2.301 JEPB]

A.3. The maximum throughput rate for this EU **(Total for all North and South Tanks)** shall not exceed 900 million gallons per year of product.

[Rule 62-210 (PTE), FAC, and Air Construction Permit Application No. 0310562-007-AC]

EMISSIONS STANDARDS, TESTING REQUIREMENTS AND RECORDS AND REPORTS

A.4. This permit **does not** add to or modify any emissions standard, testing, monitoring, or any recording and reporting requirements from that which is currently in the Title V permit.

B. EU002 Truck Rack South Tank Farm

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
002	Truck Rack South Tank Farm

Fuel load-out operation: Three-bay tanker truck load-out, 12 total loading arms loading gasoline, gasoline blends and other fuel products into tanker trucks. The primary control device is a John Zink carbon adsorption/ absorption vapor recovery unit (VRU) Model #S3AAD. The secondary control equipment is a John Zink enclosed flare system (4,800 gpm flow rate) Model #ZCT-2-8-35-x-2/ 8-x. The VCU shall be the VOC emissions control device unit for EU 002 when the VRU is either non-functioning due to breakdowns or maintenance. or when it is being used to control VOC emissions from EU 003. VOC vapors from this EU will be directed to the VCU during times that the VRU unit is operating as a backup to EU003's VRU.

{This EU is regulated under 40 CFR 60, Subpart XX and 40 CFR 60, Subpart A, NSPS General Provisions and Rule 62-297.440(2)(b)2., F.A.C., Rule 62-204.800(8)(b)56., F.A.C., Rule 62-296.500(2), F.A.C., 62-296.510(3), F.A.C., Rule 2.1101, Rule 2.201 JEPB and Rule 2.1201. JEPB and 40 CFR 63, Subpart BBBBBB}

B.1. <u>Relation to Other Permits</u>. The conditions of this permit supplements all other previously issued air construction and operation permits for these emissions units. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, and the like.

[Rules 62-4.210, 62-4.030, and 62-210.300(1)(b), F.A.C.]

PROPOSED CONSTRUCTION WORK

B.2.a. The permittee is authorized to install at the facility as a part of this project a new VRU as a secondary vapor control device.

- As part of the installation activities, the new VRU for this EU will also be connected to the North Tank Farm truck rack (EU003).

The construction shall be in accordance with the application and associated documents provided to the Permitting Authority for the issuance of this permit. Any changes to the project that are contrary to these documents and permit shall be reported in writing to the Permitting Authority by the P.E. of Record.

[Air Construction Permit Application No. 0310562-007-AC, and Rule 62-296.500(2)(a)2., F.A.C.]

B.2.b. Organic vapors from this EU South Tank Farm truck rack shall be directed to the existing Vapor Combustion Unit (VCU) during times when this new VRU is operating as the backup control device to the existing VRU at the North Tank Farm truck rack (EU003), or when the VRU is not functioning.

[Air Construction Permit Application No. 0310562-007-AC]

PERFORMANCE RESTRICTIONS

B.3. Permitted Maximum Throughput Rate. The maximum allowable throughput rate shall not exceed 450 million gallons per year of product.

[Rules 62-4.160(2), 62-204.800, 62-210.200(PTE), Air Construction Permit Application No. 0310562-007-AC]

B.4. Hours of Operation. This emission unit may operate continuously (8,760 hours/year).

[Rule 62-210.200(PTE), F.A.C., Rule 2.301 JEPB]

EMISSIONS STANDARDS

B.5.a. This permit **does not** authorize any changes to the emissions rates from the previous permits. The TOC emissions in the flare exhaust shall not exceed 10 milligrams per liter of product loaded (9.2 tons per year).

B.5.b. NESHAP Vapor Collection System Emissions Limit. This permit **does not** authorize any changes to the emissions rates from the previous permits. Reduce emissions of TOC to less than or equal to 80 mg/l of gasoline loaded into gasoline cargo tanks at the loading rack.

[40 CFR 63.11088(a), Table 2 to subpart BBBBBB]

TESTING REQUIREMENTS

B.6. Initial Total Organic Compound (TOC) Tests. After the new VRU is operational, the emissions unit shall be tested to demonstrate initial compliance with the emissions standards for TOC while utilizing the new VRU. The initial tests shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the unit. However, if this date is close to the next scheduled VCU compliance testing date the facility can demonstrate initial new VRU compliance around that same time.

[Rules 62-4.070(3) and 62-297.310(8)(b)1, F.A.C.]

B.7. Testing for demonstration of compliance shall be performed in accordance with EPA Reference Methods 2A and 25A/25B (as described in 40 CFR 60, Appendix A) for TOC emissions. The facility shall also conduct testing in accordance with EPA Methods 21 and 27.

VRU:

(a) *Reference methods and procedures.* In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in 40 CFR. 60.8(b). The three-run requirement of 40 CFR 60.8(f) does not apply to this subpart.

(b) *Monitor for leakage of vapor.* Immediately before the performance test on the vapor processing and liquid loading equipment, the owner or operator shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.

B.7. Continued:

{Permitting Note. 40 CFR 63 subpart BBBBBB threshold for pre-test leak repair is 500 ppm instead of 10,000 ppm. [40 CFR* 63.11092(a)(1)(i)]*}

(c) (1) *Test duration and gasoline loaded.* The performance test shall be at least 6 hours long during which at least 80,000 gallons (302,800 liters) of gasoline is loaded. If this is not possible, the test may be continued the same day until 80,000 gallons of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 80,000-gallons criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.

(2) *Intermittent operation.* If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.

(3) *Emission rate computation.* The emission rate (E) of TOC shall be computed using the following equation:

$$E = K\sum_{i=1}^{n}\left(V_{esi}C_{ei}\right)/L10^{6}$$

where:

E = emission rate of TOC, mg/liter of gasoline loaded.
V_{esi} = volume of air-vapor mixture exhausted at each interval "i", scm.
C_{ei} = concentration of TOC at each interval "i", ppm.
L = total volume of gasoline loaded, liters.
n = number of testing intervals.
i = emission testing interval of 5 minutes.
K = density of calibration gas, 1.83×10^{6} for propane and 2.41×10^{6} for butane, mg/scm.

(4) *Test interval.* The performance test shall be conducted in intervals of 5 minutes. For each interval ``i", readings from each measurement shall be recorded, and the volume exhausted (Vesi) and the corresponding average TOC concentration (Cei) shall be determined. The sampling system response time shall be considered in determining the average TOC concentration corresponding to the volume exhausted.

(5) *Volume (Vesi) air-vapor mixture exhausted at each interval.* Method 2A shall be used to determine Vesi for the VRU.

(6) *TOC concentration (Cei) at each interval.* Method 25A or 25B shall be used for determining Cei. The calibration gas shall be either propane or butane. The owner or operator may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the Administrator.

B.7. Continued:

(7) *Volume (L) of gasoline dispensed during the performance test period.* To determine L at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used.

(d) *Gauge pressure measurement.* The owner or operator shall use the following procedure to determine compliance with the standard in 40 CFR 60.502(h), which requires that the vapor collection and liquid loading equipment be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading.

(1) *Pressure measurement.* A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ± 2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.

(2) *Pressure recording*. During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.

[40 CFR 60.503, Rule 62-204.800, F.A.C., and Rule 2.201, JEPB]

B.8. <u>Annual Compliance Tests</u>. During every calendar year (January 1 – December 31), the emissions unit shall be tested to demonstrate compliance with the emissions standards for TOC.

[Rule 62-297.310(8)(a)1, F.A.C.]

B.9. <u>Test Requirements</u>. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rule 62-297.310(9) and (10), F.A.C.]

MONITORING REQUIREMENTS, NOTIFICATIONS, RECORD-KEEPING AND REPORTING

B.10. This permit **does not** add to or modify any monitoring, or any recording and reporting requirements from that which is currently permitted.

B.11. <u>Commencement of Construction and Operation</u>. After the new VRU is installed, the permittee shall submit to the Air Compliance Authority of this Office written notification of the date of commencement of construction and operation. This notification shall be submitted to Christopher Kirts at Christopher.Kirts@dep.state.fl.us no later than thirty (30) business day following commencement of construction and operation.

[Rule 62-4.070(3), F.A.C.]

C. EU003 Truck Rack North Tank Farm

This section of the permit addresses the following emissions unit.

ID No.	Emission Unit Description
003	Truck Rack North Tank Farm

Fuel load-out operation: Three-bay tanker truck load-out, 15 total loading arms. The primary control device is a John Zink Carbon Adsorption/Absorption Vapor Recovery Unit (VRU). EU002's VRU is tied into this EU as a backup (secondary) vapor control device.

{This EU is regulated under Rule 62-296.510(3)(a)-(d), 40 CFR 60, Subpart XX and 40 CFR 60, Subpart A, NSPS General Provisions, 40 CFR 63, Subpart BBBBBB and 40 CFR 63, Subpart A, NESHAP General Provisions.}

C.1. Relation to Other Permits. The conditions of this permit supplements all other previously issued air construction and operation permits for these emissions units. These conditions are in addition to all other applicable permit conditions and regulatory requirements. The Permittee shall continue to comply with the conditions of those permits, which include restrictions and standards regarding capacities, production, operation, fuels, emissions, monitoring, recordkeeping, reporting, and the like.

[Rules 62-4.210, 62-4.030, and 62-210.300(1)(b), F.A.C.]

PROPOSED CONSTRUCTION WORK

C.2. The permittee is authorized to install at the facility as a part of this project:

- The new VRU installed at EU002 shall tie into this EU003 as a secondary vapor control device, and shall be operated when this units existing VRU is non-functioning due to breakdowns or maintenance.

The construction shall be in accordance with the application and associated documents provided to the Permitting Authority for the issuance of this permit. Any changes to the project that are contrary to these documents and permit shall be reported in writing to the Permitting Authority by the P.E. of Record.

[Air Construction Permit Application No. 0310562-007-AC, and Rule 62-296.500(2)(a).2, F.A.C.,]

PERFORMANCE RESTRICTIONS

C.3. Permitted Capacity. This permit **does not** modify the existing permitted throughput for this emissions unit. The maximum allowable throughput rate shall not exceed 450 million gallons per year of product.

[Rule 62-210.200(PTE), F.A.C.]

C.4. Hours of Operation. The hours of operation of are not limited (8760 hours per year).

[Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.]

EMISSIONS STANDARDS

C.4.a. <u>NSPS Vapor Collection System Emissions Limit</u>. This permit **does not** authorize any changes to the emissions rates from the previous permits. Total organic compounds (TOC) from gasoline loading shall be limited to 35 milligrams per liter of gasoline loaded and to 61.69 tons per year.

[Rule 40 CFR 60.502(b), Rule 62-204.800(8), F.A.C., and Rule 2.201, JEPB, and Applicant's request]

C.4.b. <u>State Rule and NESHAP Vapor Collection System Emissions Limit</u>. This permit **does not** authorize any changes to the emissions rates from the previous permits. Reduce emissions of TOC to less than or equal to 80 mg/l of gasoline loaded into gasoline cargo tanks at the loading rack.

[40 CFR 63.11088(a), Table 2 to subpart BBBBBB, and Rule 62-296.510(2), F.A.C.]

TESTING REQUIREMENTS

C.5. <u>Initial Total Organic Compound (TOC) Tests</u>. After the new VRU from EU002 has been tied into the existing EU003 unit; and the unit is operational, the emissions unit shall be tested to demonstrate initial compliance with the emissions standards for TOC while utilizing the new VRU. The initial test shall be conducted within 60 days after achieving permitted capacity, but not later than 180 days after initial operation of the units. However, if this date is close to the next scheduled compliance testing date for the existing VRU, the facility can demonstrate the initial compliance testing of the new VRU around that same time.

[Rules 62-4.070(3) and 62-297.310(8)(b)1, F.A.C.]

C.6. Testing for demonstration of compliance shall be performed in accordance with EPA Reference Methods 2A and 25A/25B (as described in 40 CFR 60, Appendix A) for TOC emissions. The facility shall also conduct testing in accordance with EPA Methods 21 and 27.

VRU:

(a) *Reference methods and procedures.* In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in appendix A of this part or other methods and procedures as specified in this section, except as provided in 40 CFR. 60.8(b). The three-run requirement of 40 CFR 60.8(f) does not apply to this subpart.

(b) *Monitor for leakage of vapor.* Immediately before the performance test on the vapor processing and liquid loading equipment, the owner or operator shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The owner or operator shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.

{<u>Permitting Note</u>. 40 CFR 63 subpart BBBBBB threshold for pre-test leak repair is 500 ppm instead of 10,000 ppm. 40 CFR* 63.11092(a)(1)(i)*}

C.6. Continued:

(c) (1) *Test duration and gasoline loaded.* The performance test shall be at least 6 hours long during which at least 80,000 gallons (302,800 liters) of gasoline is loaded. If this is not possible, the test may be continued the same day until 80,000 gallons of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 80,000-gallons criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.

(2) *Intermittent operation.* If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.

(3) *Emission rate computation.* The emission rate (E) of TOC shall be computed using the following equation:

$$E = K\sum_{i=1}^{n}\left(V_{esi}C_{ei}\right)/L10^{6}$$

where:

E = emission rate of TOC, mg/liter of gasoline loaded.
V_{esi} = volume of air-vapor mixture exhausted at each interval "i", scm.
C_{ei} = concentration of TOC at each interval "i", ppm.
L = total volume of gasoline loaded, liters.
n = number of testing intervals.
i = emission testing interval of 5 minutes.
K = density of calibration gas, 1.83×10^6 for propane and 2.41×10^6 for butane, mg/scm.

(4) *Test interval.* The performance test shall be conducted in intervals of 5 minutes. For each interval ``i", readings from each measurement shall be recorded, and the volume exhausted (Vesi) and the corresponding average TOC concentration (Cei) shall be determined. The sampling system response time shall be considered in determining the average TOC concentration corresponding to the volume exhausted.

(5) *Volume (Vesi) air-vapor mixture exhausted at each interval.* Method 2A shall be used to determine Vesi for the VRU.

(6) *TOC concentration (Cei) at each interval.* Method 25A or 25B shall be used for determining Cei. The calibration gas shall be either propane or butane. The owner or operator may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the Administrator.

(7) *Volume (L) of gasoline dispensed during the performance test period.* To determine L at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used.

C.6. Continued:

(d) *Gauge pressure measurement.* The owner or operator shall use the following procedure to determine compliance with the standard in 40 CFR 60.502(h), which requires that the vapor collection and liquid loading equipment be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading.

(1) *Pressure measurement.* A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ± 2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.

(2) *Pressure recording*. During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.

[40 CFR 60.503, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

C.7. <u>Annual Compliance Tests</u>. During every calendar year (January 1 – December 31), the emissions units shall be tested to demonstrate compliance with the emissions standards for TOC.

[Rule 62-297.310(8)(a)1, F.A.C.]

C.8. <u>Test Requirements</u>. Tests shall be conducted in accordance with the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit.

[Rule 62-297.310(9) and (10), F.A.C.]

MONITORING REQUIREMENTS, NOTIFICATIONS, RECORD-KEEPING AND REPORTING

C.9. This permit **does not** add to or modify any monitoring, or any recording and reporting requirements from that which is currently permitted.

C.10. <u>Commencement of Construction and Operation</u>. After the new VRU is tied into EU003, the permittee shall submit to the Air Compliance Authority of this Office written notification of the date of commencement of construction and operation. This notification shall be submitted to Christopher Kirts at Christopher.Kirts@dep.state.fl.us no later than thirty (30) business day following commencement of construction and operation.

[Rule 62-4.070(3), F.A.C.]