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## PERMITTEE

Buckeye Terminals, LLC  
848 McCloskey Boulevard  
Tampa, FL 33605

Authorized Representative:  
Michael Miller, Operations Manager

Air Permit No. 0570083-029-AF  
Effective Date: June 26, 2018  
Renewal Application Due Date: April 27, 2023  
Expiration Date: June 26, 2023

Tampa South Terminal  
Hillsborough County, Florida

## PROJECT

This is the final Federally Enforceable State Operation Permit (FESOP), which authorizes the operation of the Buckeye Tampa South Terminal, which is a bulk petroleum terminal (Standard Industrial Classification No. 5171). This project renews the operation of the facility and incorporates Permit No. 0570083-027-AC. The facility is located in Hillsborough County at 848 McCloskey Boulevard in Tampa, Florida. The UTM coordinates are Zone 17, 358.0 kilometers (km) East, and 3090.3 km North.

This final permit is organized into the following sections: Section 1 (General Information); Section 2 (Administrative Requirements); Section 3 (Emissions Unit Specific Conditions); and 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.

**Permitting Authority:** Applications for air operation permits are subject to review in accordance with the provisions of Chapter 403, Florida Statutes (F.S.) and Chapters 62-4 and 62-210 of the Florida Administrative Code (F.A.C.). The Permitting Authority responsible for making a permit determination for this project is the Environmental Protection Commission of Hillsborough County (EPC). The Permitting Authority's physical and mailing address is: 3629 Queen Palm Drive, Tampa, Florida 33619. The Permitting Authority's telephone number is 813/627-2600.

**Petitions.** A person whose substantial interests are affected by the proposed decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602. Petitions filed by the applicant or any of the parties listed below must be filed within 14 days of receipt of this notice. Petitions filed by any other person must be filed within 14 days of receipt of this proposed action. A petitioner must mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if

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## FINAL PERMIT

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known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when each petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, as well as the rules and statutes which entitle the petitioner to relief; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and, (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the permitting authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

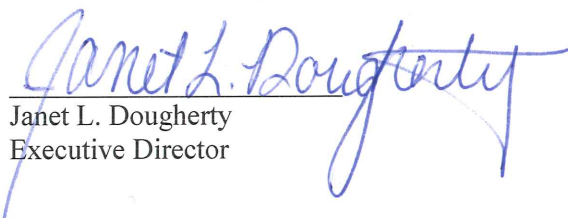
Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the permitting authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

**Mediation:** Mediation is not available in this proceeding.

**Effective Date:** This permitting decision is final and effective on the date filed with the clerk of the Permitting Authority unless a petition is filed in accordance with the above paragraphs or unless a request for extension of time in which to file a petition is filed within the time specified for filing a petition pursuant to Rule 62-110.106, F.A.C., and the petition conforms to the content requirements of Rules 28-106.201 and 28-106.301, F.A.C. Upon timely filing of a petition or a request for extension of time, this action will not be effective until further order of the Permitting Authority.

**Judicial Review:** Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Legal Department of the EPC at 3629 Queen Palm Drive, Tampa, Florida 33619, Phone 813-627-2600, Fax 813-627-2602 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 Tampa, Florida

  
Janet L. Dougherty  
Executive Director

## FINAL PERMIT

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### CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Federally Enforceable State Operation Permit package was sent by electronic mail, or a link to these documents made available electronically on a publicly accessible server, with received receipt requested before the close of business on the date indicated below to the following persons.

Michael Miller, Buckeye Terminals, LLC ([mmiller@buckeye.com](mailto:mmiller@buckeye.com))

Radford Murphy, Buckeye Terminals, LLC ([rmurphy@buckeye.com](mailto:rmurphy@buckeye.com))

Robert Baker, P.E., Baker Environmental Engineering, Inc. ([baker@atlantic.net](mailto:baker@atlantic.net))

Clerk Stamp

**FILING AND ACKNOWLEDGMENT FILED**, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated agency clerk, receipt of which is hereby acknowledged.

Sahnd Nasseri  
(Clerk)

6/26/18  
(Date)

## SECTION 1. GENERAL INFORMATION

The existing facility consists of the following emissions units (EU):

### 003 - Truck Loading Rack and Denatured Ethanol Station with a primary VRU and a VCU as backup

### 004 - Gasoline Storage Tanks

Tank No.	Roof Type	Volume (gallons)	Color	Primary/Secondary Seal
29	DEFRT/IFR	2,638,986	White	Welded Mechanical Shoe/Rim Mounted
33	IFR	4,818,380	White	Welded Mechanical Shoe/Rim Mounted
34	IFR	1,512,937	White	Bolted Vapor-Mounted/None
35	IFR	1,641,623	White	Bolted Mechanical Shoe/ Rim Mounted
36	IFR	3,443,707	White	Welded Mechanical Shoe/Rim Mounted
50	IFR	4,223,231	White	Welded Liquid –Mounted/Rim-Mounted
51	IFR	3,077,184	White	Welded Liquid –Mounted/Rim-Mounted

### 007 - Petroleum Contact Water Tanks/Gasoline Storage Tanks

Tank No.	Roof Type	Volume (gallons)	Color	Primary/Secondary Seal
18	IFR	88,007	White	Bolted Vapor-Mounted/Rim-Mounted
19	IFR	88,007	White	Mechanical Shoe/Rim Mounted Wiper

### 011 - Additive and Slop Tanks

Tank No.	Roof Type	Volume (gallons)	Color
41	HFR	8,272	White
42	HFR	6,175	White
Slop	HFR	2,000	White

### 101 - Diesel Storage Tank

Tank No.	Roof Type	Volume (gallons)	Color
40	HFR	12,660	White

A summary of applicable regulations is shown in the following table.

Regulation	EU No(s).
<i>Federal Rule Citations</i>	
40 CFR 60, Subpart A, NSPS General Provisions	003, 004
40 CFR 60, Subpart Kb	004
40 CFR 60, Subpart XX	003
<i>State Rule Citations</i>	
Rule 62-296.320, F.A.C., General Pollutant Emission Limiting Standards	003, 004, 007, 011, 101
Rule 62-296.508, F.A.C., Petroleum Liquid Storage	004, 007
Rule 62-296.510, F.A.C., Bulk Gasoline Terminals	003

## SECTION 1. GENERAL INFORMATION

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Regulation	EU No(s).
<i>Local Rule Citations</i>	
Ch. 1-3, Rules of the EPCHC	003, 004, 007, 011,101

### 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 not a Title V major source of air pollution in accordance with Chapter 62-213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, F.A.C. for the Prevention of Significant Deterioration (PSD) of Air Quality.
- This facility is subject to 40 CFR 63, Subpart BBBB, NESHAP for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. However, this rule has not been adopted by the State of Florida.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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- FW1. Permitting Authority: The permitting authority for this project is the Environmental Protection Commission of Hillsborough County (EPC). The Permitting Authority's physical and mailing address is: 3629 Queen Palm Drive, Tampa, FL 33619. All documents related to applications for permits to operate an emissions unit shall be submitted to the EPC.
- FW2. Compliance Authority: All documents related to compliance activities such as reports, tests, and notifications shall be submitted to the EPC at: 3629 Queen Palm Dr., Tampa, FL 33619.
- FW3. Appendices: The following Appendices are attached as a part of this permit: Appendix A (Citation Formats and Glossary of Common Terms); Appendix B (General Conditions); Appendix C (Common Conditions); and Appendix D (Common Testing Requirements); Appendix E (40 CFR 60 Subpart A); Appendix F (40 CFR 60 Subpart Kb); and Appendix G (40 CFR 60 Subpart XX).
- FW4. 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.
- FW5. 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.]
- FW6. Modifications: 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.]
- FW7. All applicable rules of the Environmental Protection Commission of Hillsborough County including design discharge limitations specified in the application shall be adhered to. The permit holder may also need to comply with county, municipal, federal, or other state regulations prior to construction. [Rule 62-4.070(7), F.A.C.]
- FW8. Renewal. Prior to 60 days before the expiration date of this permit, the permittee shall apply for a renewal of the permit. A renewal application shall be timely and sufficient. If the application is submitted prior to 60 days before expiration of the permit, it will be considered timely and sufficient. If the renewal application is submitted at a later date, it will not be considered timely and sufficient unless it is submitted and made complete prior to the expiration of the operation permit. When the application for renewal is timely and sufficient, the existing permit shall remain in effect until the renewal application has been finally acted upon by the Department. [Rule 62-4.090, F.A.C.]
- FW9. Annual Operating Report (AOR): The information required by the Annual Operating Report for Air Pollutant Emitting Facility (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the EPC. All synthetic non-Title V sources shall submit a completed DEP Form 62-210.900(5) unless the annual operating report is submitted using the DEP's electronic annual operating report software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. [Rule 62-210.370(3), F.A.C.]
- {Permitting Note: Resources to help you complete your AOR are available on the electronic AOR (EAOR) website at: <http://www.dep.state.fl.us/air/emission/eaor>. If you have questions or need assistance after reviewing the information posted on the EAOR website, please contact the Department by phone at (850) 717-9000 or email at [eaor@dep.state.fl.us](mailto:eaor@dep.state.fl.us).}*
- FW10. Potential-To-Emit: As requested by the permittee, in order to limit the potential to emit and establish the facility as a Synthetic Non-Title V Source for both Volatile Organic Compound (VOCs) and Hazardous Air



## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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Pollutants (HAP), the following emission limitation shall apply: [Rules 62-4.070(3) and 62-210.200(PTE), F.A.C.; and Permit No. 0570083-027-AC]

- A) The maximum volatile organic compound (VOC) emissions from the facility, including fugitive emissions, shall not exceed 94.6 tons per twelve consecutive month period;
- B) HAP, as defined in Rule 62-213.200, F.A.C., emissions shall be less than 1.1 tons in any 12 consecutive month periods for any individual HAP, and less than 3.3 tons in any 12 consecutive month periods for the total of all HAPs combined.
- C) The hours of operation are not restricted.

FW11. Additional Recordkeeping: If the twelve month rolling summary of facility-wide VOC emissions shows that the VOC emissions equal or exceed 95% (90.0 tons) of the permitted limit, as specified in Facility-wide Condition No. FW.10, the facility shall maintain daily records as specified below. Once the twelve month rolling summary of VOC emissions shows that the facility-wide VOC emissions are less than 95% of the permitted limit, the facility may return to monthly recordkeeping. [Rule 62-4.070(3), F.A.C. and Permit No. 0570083-027-AC]

- A) Daily records of the throughput at the Truck Loading Rack (EU No. 003) (Gallons per Day)
- B) Monthly and twelve month rolling summary of facility-wide VOC emissions

FW12. Excess emissions resulting from startup, shutdown or malfunction of any emissions unit shall be permitted provided (1) best practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24-hour period unless specifically authorized by the Department for longer duration. Excess emissions that are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure that may reasonably be prevented during startup, shutdown or malfunction shall be prohibited. [Rules 62-210.700(1) and 62-4.070(3), F.A.C.]

FW13. When the Environmental Protection Commission of Hillsborough County (EPC) after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in Rules 62-204, 62-210, 62-212, 62-296, or 62-297, F.A.C., or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit, unless the EPCHC obtains other information sufficient to demonstrate compliance. The owner or operator of the emissions unit shall provide a report on the results of said tests to the EPC in accordance with the provisions of subsection 62-297.310(10), F.A.C. [Rule 62-297.310(8)(c), F.A.C.]

FW14. All reasonable precautions shall be taken to prevent and control generation of unconfined emissions of particulate matter in accordance with the provision in Rule 62-296.320, F.A.C. These provisions are applicable to any source, including, but not limited to, vehicular movement, transportation of materials, construction, alteration, demolition or wrecking, or industrial related activities such as loading, unloading, storing and handling. [Rule 62-296.320(4)(c), F.A.C. and Permit No. 0570083-027-AC]

FW15. The permittee shall not store, handle, process, or use in any process the volatile organic compounds or organic solvents without applying known and existing vapor emission control devices or systems as follows and as deemed necessary and ordered by the Environmental Protection Commission of Hillsborough County: [Rule 62-296.320(1)(a), F.A.C. and Permit No. 0570083-027-AC]

- A) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
- B) Where possible and practical procure/fabricate a tightly fitting cover for any open trough, basin, etc. of VOC so that it can be covered when not in use.
- C) Immediately attend to all spill/waste as appropriate.

## SECTION 2. ADMINISTRATIVE REQUIREMENTS

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FW16. The permittee shall provide timely notification to the Environmental Protection Commission of Hillsborough County prior to implementing any changes that may result in a modification to this permit pursuant to Rule 62-210.200, F.A.C., Modification. The changes do not include normal maintenance, but may include, and are not limited to, the following, and may also require prior authorization before implementation: [40 CFR 60.15 and Rules 62-210.300 and 62-4.070(3), F.A.C.]

- A) Alteration or replacement\* of any equipment or major component of such equipment.
- B) Installation or addition of any equipment which is a source of air pollution.
- C) Increasing facility wide throughput or increasing the loading rack throughput.
- D) Installing an additional loading arm or storage tank.

\*Not applicable to routine maintenance, repair, or replacement of component parts of an emission unit. The cost of replacement of component parts in an emissions unit shall count toward the fixed capital cost for reconstruction.

FW17. If the permittee wishes to transfer this permit to another owner, an "Application for Transfer of Permit" (DEP Form 62-210.900(7)) shall be submitted, in duplicate, to the Environmental Protection Commission of Hillsborough County within 30 days after the sale or legal transfer of the permitted facility. [Rule 62-4.120, F.A.C.]



### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### A. STORAGE TANKS

This section of the permit addresses the following emissions units.

<b>EU No.</b>	<b>Emission Unit Description</b>
004	Gasoline Storage Tanks 29, 33, 34, 35, 36, 50 and 51
007	Petroleum Contact Water Tanks/Gasoline Storage Tanks 18 and 19
011	Additive Storage Tanks 41, 42 and Slop Tank
101	Diesel Storage Tank 40

#### PERFORMANCE RESTRICTIONS

A.1. The following restrictions and limitations shall apply to the gasoline storage tanks (EU 004) per twelve consecutive month period: [Rule 62-4.070(3), F.A.C. and Permit No. 0570083-027-AC]

A) The maximum throughput for each tank in EU 004 shall not exceed 370,000,000 gallons per twelve consecutive month period.

B) The average annual true vapor pressure of the gasoline stored at the facility shall not exceed 8.2 psia.

A.2. The following tank throughput and vapor pressure limitations shall apply per any twelve consecutive month period: [Rule 62-4.070(3), F.A.C. and Permit Nos. 0570083-016-AC and 0570083-027-AC]

A) EU 007 - Petroleum Contact Water /Gasoline Tanks

<b>Tank No.</b>	<b>Product Stored</b>	<b>Maximum Throughput (Gallons)</b>	<b>Average Annual True Vapor Pressure (psia)</b>
18	PCW/Gasoline	200,000	8.2
19	PCW/Gasoline	200,000	8.2

B) EU 011 - Additive and Slop Tanks

<b>Tank No.</b>	<b>Product Stored</b>	<b>Maximum Throughput (Gallons)</b>	<b>Average Annual True Vapor Pressure (psia)</b>
41	Additive	200,000	0.5
42	Additive	30,000	0.5
Slop	Slop	200,000	3.4

## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

### A. STORAGE TANKS

#### C) EU 101- Diesel Storage Tank

Tank No.	Product Stored	Maximum Throughput (Gallons)	Average Annual True Vapor Pressure (psia)
40	Diesel	2,000,000	0.01

- A.3. The storage tanks in a given group may be utilized to store a variety of liquids as long as the annual average liquid vapor pressure of the stored liquid is equal to or less than the maximum annual average vapor pressure allowed in each tank group. [Rule 62-4.070(3), F.A.C. Nos. 0570083-014-AC and 0570083-027-AC]
- A.4. All tank-to-tank transfers shall be included in the emission calculations and throughput records required by this permit. [Rule 62-4.070(3), F.A.C. and Permit No. 0570083-012-AC]
- A.5. All tanks shall be numbered and be clearly identifiable by inspectors and field personnel. [Rule 62-4.070(3), F.A.C. and Permit No. 0570083-012-AC]
- A.6. Each tank shall be maintained to retain the structure, roof type, seals, controls, and color characteristics described in the application. [Rules 62-210.300 and 62-4.070(3), F.A.C.]
- A.7. The permittee shall use submerged filling techniques for all storage tanks located at this facility. The EPC finds submerged filling techniques as known and existing vapor emissions controls. [Rules 62-4.070(3) and 62-296.320(1), F.A.C. and Permit No. 0570083-012-AC]
- A.8. Tanks 18, 19, 29, 33, 34, 35, 36, 50, and 51 shall be operated and equipped with the following: [Rule 62-296.508, F.A.C. and Permit Nos. 0570083-023/024-AF/AC]
- A) An internal floating roof equipped with a closure seal, or seals, to close the space between the roof edge and tank wall, or the emissions unit has been retrofitted with an equally effective alternative control.
  - B) The emissions unit is 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:
    - 1. 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,
    - 2. Automatic bleeder vents are closed at all times except when the roof is floated off or landed on the roof leg supports; and,
    - 3. 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.

### NSPS REQUIREMENTS

- A.9. Tanks 33, 50, and 51, subject to 40 CFR 60 Subpart Kb, shall be equipped as follows: [40 CFR 60.112b(a)(1) and 60.116b(b) and Rule 62-4.070(3), F.A.C.]
- A) The internal floating roof 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 internal floating roof 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

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## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### A. STORAGE TANKS

as rapidly as possible.

- B) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
- 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.
  - 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 internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - A mechanical shoe seal. A mechanical shoe seal is a metal sheet 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.
- C) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- D) Each opening in the internal floating roof 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.
- E) 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.
- F) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- G) Each penetration of the internal floating roof 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.
- H) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
- I) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- J) The owner or operator of each storage vessel as specified in 40 CFR 60.110b(a) (Tank Nos. 33, 50, and 51) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

A.10. Tanks 33, 50, and 51, subject to 40 CFR 60 Subpart Kb, and shall be operated and inspected as follows: [40 CFR 60.113b(a) and 60.115b(a) and Rule 62-4.070(3), F.A.C.]

- A) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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#### A. STORAGE TANKS

- B) For Vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. 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 EPCHC in the inspection report required in 40 CFR 60.115b(a)(3) (Specific Condition A.10.G) below). 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.
- C) For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B) (Specific Condition No. A.9.B)ii. above):
- i. Visually inspect the vessel as specified in paragraph 40 CFR 60.113b(a)(4) (Specific Condition No. A.10.D) below) at least every 5 years; or
  - ii. Visually inspect the vessel as specified in 40 CFR 60.113b(a)(2) (Specific Condition No. A.10.B) above).
- D) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof 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. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (a)(2) (Specific Condition No. A.10.B) above) and (a)(3)(ii) (Specific Condition No. A.10.C)ii. above) of this section and at intervals no greater than 5 years in the case of vessels specified in paragraph (a)(3)(i) (Specific Condition No. A.10.C)i. above) of this section.
- E) Notify the Environmental Protection Commission of Hillsborough County in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) (Specific Condition No. A.10.A) above) and (a)(4) (Specific Condition No. A.10.D) above) of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) (Specific Condition No. A.10.D) above) of this section 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 Administrator 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 Environmental Protection Commission of Hillsborough County at least 7 days prior to the refilling.
- F) Keep a record of each inspection performed as required by 40 CFR 60.113b (a)(1), (a)(2), (a)(3), and (a)(4) (Specific Condition Nos. A.10.A), B), C), and D) above). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and

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## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### A. STORAGE TANKS

the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

- G) If any of the conditions described in 40 CFR 60.113b(a)(2) (Specific Condition No. A.10.B) above) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), (Specific Condition No. A.10.B) above) a report shall be furnished to the Environmental Protection Commission of Hillsborough County 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.
- H) After each inspection required by 40 CFR 60.113b(a)(3) (Specific Condition No. A.10.C) above) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii) (Specific Condition No. A.10.C)ii. above), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 60.112b(a)(1) (Specific Condition No. A.9. above) or 40 CFR 60.113b(a)(3) (Specific Condition No. A.10.C) above) and list each repair made

A.11. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below: [40 CFR 60.116b(e) and Rule 62-4.070(3), F.A.C.]

- A) 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.
- B) For other liquids, the vapor pressure:
  - i. May be obtained from standard reference texts, or
  - ii. Determined by ASTM D2879-83, 96, or 97 (incorporated by reference - see 40 CFR 60.17); or
  - iii. Measured by an appropriate method approved by the Administrator; or
  - iv. Calculated by an appropriate method approved by the Administrator.

A.12. TANKS 4.09d version shall be used when calculating actual tank emissions. [Rule 62-4.070(3), F.A.C. and Permit No. 0570083-024-AC]

### RECORDS AND REPORTS

A.13. Compliance with Specific Condition Nos. A.1, A.2. and A.3. shall be demonstrated through the use of a daily and monthly recordkeeping system. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request and shall remain onsite for at least three (3) years. The recordkeeping system shall contain, but is not limited to, the following information for each tank: [40 CFR 60.116b(c), Rules 62-4.070(3) and 62-4.160(14), F.A.C.]

- A) Day, Month, Year
- B) Tank Number
- C) Product(s) Stored
- D) Period of Storage of Each Product(s) (days)
- E) Average Product Vapor Pressure (psia)
- F) Throughput of the Product(s) (gallons)
- G) Twelve month rolling total of F) above
- H) The MTBE content of the gasoline (percent by weight)

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### B. LOADING RACK WITH VRU/VCU

This section of the permit addresses the following emissions unit.

EU No.	Emission Unit Description
003	Truck Loading Rack and Denatured Ethanol Station with a John Zink Carbon VRU (Primary) and a John Zink Company VCU (Backup)

#### PERFORMANCE RESTRICTIONS

B.1. As requested by the permittee, in order to limit the potential to emit, the following limitations and restrictions shall apply: [40 CFR 60.502(a),(b), and(d), Rules 62-204.800(8)(b)57., 62-296.510(3), and 62-4.070(3), F.A.C. and Permit Nos. 0570083-012-AC, 0570083-016-AC, and 0570083-022-AC]

- A) The maximum potential VOC emissions from the loading rack shall not exceed 51.4 tons for any 12 consecutive month period, which includes emissions from fugitive equipment leaks.
- B) Emissions from the truck loading rack and the denatured ethanol loading station shall not exceed 20 mg VOC/L of gasoline loaded.
- C) All displaced vapors from truck loading rack and the denatured ethanol station shall be routed to either the vapor recovery unit or the vapor combustion unit.
- D) The permittee shall maintain flow meters to accurately determine the throughput of the loading rack, denatured ethanol station, and storage tanks.
- E) The maximum combined volatile organic liquid (VOL) throughput through the truck loading rack and the denatured ethanol loading station shall not exceed 370,000,000 gallons per 12 consecutive month period.

B.2. The denatured ethanol unloading operations shall comply with the following terms and conditions: [Rule 62-4.070(3), F.A.C. and Permit No. 0570083-014-AC]

- A) Ship/Barge Unloading of Denatured Ethanol
  - i) The permittee shall use good air pollution control practices to minimize emissions.
  - ii) Ballasting of the marine vessel which results in the discharge of hydrocarbon vapors to the outside air is prohibited while operating inside the waters of Tampa Bay.
  - iii) All openings on the vessel which can be closed during product unloading and storage shall be closed to the extent practical.
- B) Truck Unloading of Denatured Ethanol
  - i) The permittee shall use good air pollution control practices to minimize emissions.
  - ii) During unloading, the pressure at the tanker trucks shall remain negative to prevent excess vapor loss.

B.3. The permittee shall prevent the loading of liquid product into non-vapor tight tank trucks using the following procedures: [40 CFR 60.502(e), Rules 62-204.800(8)(b)57. and 62-4.070(3), F.A.C., and Permit Nos. 0570083-012-AC, 0570083-014-AC, and 0570083-016-AC]

- A) The permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) (Specific Condition No. B.17) for each gasoline tank truck which is to be loaded at the affected facility.
- B) The permittee shall require the tank identification number to be cross-checked as each gasoline tank truck is loaded at the affected facility.

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## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### B. LOADING RACK WITH VRU/VCU

- C) The permittee shall not allow the loading of liquid product into a gasoline tank truck unless it has current valid vapor tightness documentation. This documentation shall be cross-checked by the facility's automation system for each gasoline tank truck prior to loading and, if the truck's vapor tightness documentation is not valid, the gasoline tank truck will not be allowed to load.
  - D) The permittee shall notify the owner or operator of each non-vapor tight gasoline tank truck that attempts to load at the facility within 1 week of the documentation cross-check. The permittee shall take steps assuring that the non-vapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.
- B.4. The permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [Rule 40 CFR 60.502(f) and Rule 62-204.800(8)(b)57., F.A.C.]
- B.5. The permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. [40 CFR 60.502(g) and Rules 62-204.800(8)(b)57. and 62-296.510(3)(a), F.A.C.]
- B.6. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d) (Specific Condition No. B.8. and B.13.E). [Rule 40 CFR 60.502(h) and Rule 62-204.800(8)(b)57., F.A.C.]
- B.7. No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [40 CFR 60.502(i) and Rule 62-204.800(8)(b)57., F.A.C.]
- B.8. A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with  $\pm 2.5$  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. [40 CFR 60.503(d)(1) and Rule 62-204.800(8)(b)57., F.A.C.]
- B.9. During periods of loading or unloading operations there shall be no reading greater than or equal to 100% of the lower explosive level (LEL) measured as propane at 1 in. (2.5 centimeters) around the perimeter of any potential leak as detected by a combustible gas detector using the procedure described in Appendix B of EPA 450/2-78-051. [Rules 62-4.070(3) and 62-297.440(2)(b)2.a., F.A.C.]
- B.10. During operation of the Carbon Adsorption Vapor Processing Systems, the following shall apply: [Rule 62-4.070(3), F.A.C. and Permit No. 0570083-016-AC]
- A) A deep vacuum shall be reached in the carbon bed during the regeneration cycle and that maximum vacuum shall be a minimum of 26 inches mercury, or the maximum average vacuum pressure obtained during the most recent annual compliance stack test.
  - B) In addition, the carbon bed operating temperature shall be a maximum of either 130°F or 10% above the operating temperature recorded during the last successful compliance test, whichever is higher.
  - C) The vacuum readings and operating temperatures shall be checked and recorded weekly for each Carbon Adsorption Vapor Processing System during loading operations at the loading rack.
  - D) If the vacuum is less than 26 inches mercury or the temperature is greater than the maximum specified above, the facility shall immediately implement corrective actions, record all these incidents, and report to the EPC within 24 hours of the incident.
  - E) Failure to adhere to the monitoring requirements specified in this condition does not necessarily indicate



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## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### B. LOADING RACK WITH VRU/VCU

an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(8)(c), F.A.C.

#### TESTING REQUIREMENTS

- B.11. 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 detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. The records shall be maintained for a minimum of three years and be made readily available to the Environmental Protection Commission of Hillsborough County, state, or federal agency upon request. [40 CFR 60.502(j) and Rules 62-204.800(8)(b)57. and 62-4.160(14)(b), F.A.C.]
- B.12. During each calendar year (January 1<sup>st</sup> to December 31<sup>st</sup>), test the truck loading rack and the denatured ethanol loading station controlled by the vapor recovery unit (VRU) for VOC emissions. Test the truck loading rack and the denatured ethanol loading station controlled by the vapor combustion unit (VCU) each year that the VCU operates five hundred (500) hours or more, in any calendar year. If the VCU operates less than five hundred hours in any given calendar year, then the VCU shall be tested at least 120 days prior to submitting the permit renewal application. During the VRU test, the permittee shall monitor and record the maximum vacuum pressure and the temperature in the carbon beds, hourly, and include it in the test report. During the VCU test, the permittee shall monitor and record the hourly temperature. Submit two copies of the test data to the Air Management Division of the Environmental Protection Commission of Hillsborough County within 45 days of such testing. Testing procedures shall be consistent with the requirements of Rule 62-297.310, F.A.C., 40 CFR 60, Appendix A, and the applicable requirements specified in Appendix D (Common Testing Requirements) of this permit. [Rules 62-4.070(3) and 62-297.310, F.A.C. and Permit No. 0570083-016-AC]
- B.13. In order to ensure compliance with Specific Condition No. B.1., the following conditions shall apply: [40 CFR 60.503(c), 40 CFR 60.503(d)(2), and Rules 62-204.800(8)(b)57., 62-296.510(4), and 62-297.440(2)(b)1.a., and 62-4.070(3) F.A.C.]
- A) Testing of emissions shall be accomplished in accordance with 40 CFR 60 Subpart XX – *Standards of Performance for Bulk Gasoline Terminals*.
  - B) The permittee shall stop loading to any tanker truck which leaks at a level greater than defined in Specific Condition No. B.3. Testing shall be accomplished under the normal leak check program, and no special provisions shall be made on the date of the compliance test to exclude loading of leaking trucks. Testing shall be conducted just prior to any scheduled maintenance on the control equipment. The percent of leaking trucks found on the test date and the recent maintenance records for the control equipment shall be submitted with the test report. Failure to include the actual process rate in the results may invalidate the test.
  - C) The performance test shall be 6 hours long during which at least 302,800 liters (80,000 gallons) of gasoline is loaded. If this is not possible, the test may be continued the same day until 302,800 liters (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 302,800 liters (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.
  - D) 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.
  - E) During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is

### SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

#### B. LOADING RACK WITH VRU/VCU

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.

- F) The emission rate (E) of total organic compounds shall be computed using the following equation: [40 CFR 60.503(c)(3)]

$$E = K \sum_{i=1}^n (V_{esi} C_{ei}) / (L 10^6)$$

where:

E = emission rate of total organic compounds, mg/liter of gasoline loaded.

$V_{esi}$  = volume of air-vapor mixture exhausted at each interval "i", scm.

$C_{ei}$  = concentration of total organic compounds 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,  $1.83 \times 10^6$  for propane and  $2.41 \times 10^6$  for butane, mg/scm.

- G) 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 ( $V_{esi}$ ) and the corresponding average total organic compounds concentration ( $C_{ei}$ ) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.

- B.14. Immediately before the performance test specified in Specific Condition Nos. B.1.B) and B.6., the permittee shall use EPA 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. [40 CFR 60.503(b) and Rules 62-204.800(8)(b)57. and 62-296.510(4)(b), F.A.C.]

- B.15. Test Methods: Required tests shall be performed in accordance with the following reference methods:

Method	Description of Method and Comments
2A or 2B	Method 2A - Direct Measurement Of Gas Volume Through Pipes And Small Ducts Method 2B - Determination Of Exhaust Gas Volume Flow Rate From Gasoline Vapor Incinerators
21	Determination Of Volatile Organic Compound Leaks
25A or 25B	Method 25A - Determination Of Total Gaseous Organic Concentration Using A Flame Ionization Analyzer Method 25B - Determination Of Total Gaseous Organic Concentration Using A Nondispersive Infrared Analyzer The calibration gas for Methods 25A or 25B shall be either propane or butane. The permittee may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the Administrator.
27	Determination Of Vapor Tightness Of Gasoline Delivery Tank Using Pressure Vacuum Test

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## SECTION 3. EMISSIONS UNIT SPECIFIC CONDITIONS

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### B. LOADING RACK WITH VRU/VCU

The above methods are described in Appendix A of 40 CFR 60 and are adopted by reference in Rule 62-204.800, F.A.C. No other methods may be used unless prior written approval is received from the EPCHC. [40 CFR 60.503(b) and (c) and Rule 62-204.800, F.A.C.; and Appendix A of 40 CFR 60]

- B.16. At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the air compliance program identified by permit, unless shorter notice is agreed to by the appropriate air compliance program. The notification shall include the date, time, place of each such test, Facility ID Number, Emission Unit ID Number(s) and description(s), Emission Point Number(s) and description(s), test method(s), pollutant(s) to be tested, along with the name and telephone number of the person who will be responsible for conducting such test(s) for the owner or operator. If a scheduled emissions test needs to be re-scheduled, the owner or operator shall submit to the appropriate air compliance program a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the appropriate air compliance program by mutual agreement. [Rule 62-297.310(9), F.A.C.]

### RECORDS AND REPORTS

- B.17. The tank truck vapor tightness documentation required in Specific Condition No. B.3. shall be updated at least once per year to reflect current test results as determined by EPA Method 27. This documentation shall include, as a minimum, the following. The documentation shall be kept at the facility in a permanent form or at an off-site location provided that the terminal owner or operator is able to make a copy of the tank truck vapor tightness documentation (e.g., via facsimile from the off-site location) available for inspection during the course of the Agency's site visit; otherwise, the owner or operator must make available a copy of the tank truck vapor tightness documentation to the inspector within a mutually agreeable timeframe: [40 CFR 60.505(b) and (e) and Rule 62-204.800(8)(b)57., F.A.C.]

- A) Test Title: Gasoline delivery tank pressure test-EPA reference Method 27
- B) Tank Owner and Address
- C) Tank Identification Number
- D) Test Location
- E) Date of Test
- F) Tester Name and Signature
- G) Witnessing Inspector (if any): Name, Signature and Affiliation
- H) Test Results: Actual pressure change in 5 minutes, mm of water (average for 2 runs)

- B.18. The permittee shall maintain records of each monthly leak inspection required by Specific Condition No. B.11 for at least three (3) years and shall include, as a minimum, the following. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request: [40 CFR 60.505(c) and Rules 62-204.800(8)(b)57. and 62-4.160(14), F.A.C.]

- A) Date of Inspection
- B) Areas where leak inspection was performed
- C) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak)
- D) Leak Determination Method
- E) Corrective Action (Date each leak repair of; Reasons for repair interval in excess of 25 days)
- F) Inspector Name and Signature

- B.19. Compliance with Specific Condition Nos. B.1, B.10 and B.11 shall be demonstrated through the use of a daily and monthly recordkeeping system. The records shall be made available to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency upon request and shall remain onsite for at least three (3) years. The records shall include, but not limited to, the following: [40 CFR 60.505(f), Rules 62-204.800(8)(b)57., 62-4.070(3), and 62-4.160(14), F.A.C. and Permit No. 0570083-016-AC]

- A) Day, Month, Year

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#### **B. LOADING RACK WITH VRU/VCU**

- B) Monthly amount and type of VOL loaded into trucks at the truck loading rack and at the denatured ethanol station, (gallons)
- C) Record the hours of operation for the VCU
- D) Twelve month rolling total of B) and C) above
- E) Record weekly the maximum vacuum pressure reached at each VRU carbon bed during the regeneration cycle.
- F) Record weekly the temperature of each VRU carbon bed (°F).
- G) Record all incidents where the maximum vacuum for the carbon beds is below the 26 inches mercury or the maximum average vacuum pressure obtained during the most recent annual compliance stack test.
- H) Record all incidents where the carbon beds' temperature is higher than 130°F or 10% above the operating temperature recorded during the last successful compliance test.
- I) Records of inspections and preventative maintenance performed on the VRU and VCU.
- J) Records of all replacements or additions of components performed on the VRU and VCU.