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*Sent by Electronic mail – Received Receipt Requested*

John J. McFadden
Operations Manager - Florida
Kinder Morgan Liquids Terminals LLC (KMLT) – Tampa Terminal
2101 GATX Drive
Tampa, FL 33605

RE: Project No. 0570085-030-AC
Air Construction Permit
Distillate Throughput Increase

Dear Mr. McFadden:

Based on the permit application received on September 12, 2016, this permit is being issued concurrently with the DRAFT/PROPOSED Title V Renewal Permit No. 0570085-031-AV in order to increase the distillate fuel throughput at the truck loading racks. This project includes the combined public notice for both permits. The existing facility is located in Hillsborough County at 2101 GATX Drive, Tampa, Florida, 33605.

Enclosed are the following documents: the Technical Evaluation and Preliminary Determination; the Draft Permit; the Written Notice of Intent to Issue Air Permit; and the combined Public Notice of Intent to Issue Air Permit. The combined Public Notice of Intent to Issue Air Permit is the actual notice that you must publish in the legal advertisement section of a newspaper of general circulation in the area affected by this project. If you have any questions, please contact Diana M. Lee, P.E. at 813-627-2600 x1276, or by e-mail at lee@epchc.org.

Executed in Hillsborough County, Florida.

Sincerely,

Janet L. Dougherty
Executive Director

Enclosures

JLD/KRZ/krz

# TECHNICAL EVALUATION

# &

# PRELIMINARY DETERMINATION

**APPLICANT**
Kinder Morgan Liquids Terminals LLC (KMLT)
Tampa Terminal
2101 GATX Drive
Tampa, FL 33605
Facility ID No. 0570085

**PROJECT**
Project No. 0570085-030-AC
Application for Minor Source Air Construction Permit
Distillate Throughput Increase

**COUNTY**
Hillsborough County, Florida

**PERMITTING AUTHORITY**
Environmental Protection Commission of Hillsborough County
3629 Queen Palm Dr.
Tampa, FL 33619

December 2, 2016

## 1. GENERAL PROJECT INFORMATION

- **Air Pollution Regulations**

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (F.S.). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (F.A.C.), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Chapters 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations in Rule 62-204.800, F.A.C.

**Glossary of Common Terms**

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A of in the combined AC/AV permits.

**Facility Description and Location**

The KMLT Tampa Terminal, is a bulk gasoline terminal that handles gasoline, jet fuel, diesel fuel, biodiesel fuel, ethanol, additives, and other volatile organic products (VOLs) and is categorized under Standard Industrial Classification Code No. 4226 – Special Warehousing and Storage. Two small pump stations (Hemlock Pump Station and the Tampa Pump Station) owned by Central Florida Pipeline LLC, a wholly owned subsidiary of KMLT, are also covered under this permit. The Tampa Terminal is located in Hillsborough County at 2101 GATX Drive, Tampa, FL 33605.

The UTM coordinates of the existing facility are Zone 17, 358.0 km East, and 3088.7 km North. This site is in an area that is in attainment (or designated as unclassifiable) for all air pollutants subject to Ambient Air Quality Standards (AAQS), except for ozone. Hillsborough County is designated as an air quality maintenance area for ozone.

**Facility Regulatory Categories**

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility is 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.

**Project Description**
This permit is being issued concurrently with DRAFT/PROPOSED Title V Renewal Permit No. 0570085-031-AV in order to increase the distillate fuel throughput at the truck loading racks. This project includes the combined public notice for both permits.

**Processing Schedule**

September 12, 2016 – Received the permit application.
Not Applicable - Requested additional information.
September 12, 2016 - Application Complete.
October 17, 2016 – Issued Draft Air Construction Permit

## 2. PROJECT REVIEW

The AC permit is being issued concurrently with the Title V renewal permit for a throughput increase in the distillate fuel at the truck loading racks (EU 017). The facility requested that the individual throughput limits of diesel and jet fuel be increased from 150,000,000 gal/yr (each) to a combined total distillate fuel throughput of 450,000,000 gal/yr in order to allow the facility operational flexibility. The VOC PTE emissions from the loading racks (EU 017) were calculated to be 93.6 TPY, which includes the emissions from the loading of gasoline, ethanol and PCW at the loading racks.

Truck Loading Racks T/T Area No. 3 and T/T Area No. 7 (EU 017) are controlled by submerged filling, and a Vapor Recovery Unit (VRU) and an open flame flare unit (OFFU). The VRU, a Jordan Technologies, Model JT-100100-1500 Dry VRU, is equipped with a Continuous Emissions Monitoring System (CEMS) to monitor VOC emissions. The VRU is operated as the primary control device. The OFFU, a John Zink Company, Model GV-LH-8400-2 open flame, air assisted flare unit, is operated as a back-up unit. The OFFU is used when the VRU is down for maintenance or repair and periodically to ensure the OFFU remains operational.

The facility is a major source of VOC with a facility-wide VOC PTE of 195.4 TPY and an area source of HAP emissions. The facility is subject to 40 CFR 63, Subpart BBBBBB (Area Source NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities). The loading racks (EU 017) are subject to 40 CFR 60, Subpart XX (NSPS for Bulk Gasoline Terminals.

**Summary of Facility-Wide Potential Emissions**

| **Emission Unit (EU) No.** | **EU Description** | Regulated Pollutant | Potential Emissions (tons/yr) |
|---|---|---|---|
| 017 [(1)] | Truck Loading Rack T/T Area Nos. 3 and 7 | VOC | 93.6 |
| | Facility-wide | VOC | 195.4 |

[(1)] This modification will result in a minor increase of VOC emissions of 0.073 TPY based on the true vapor pressure of 0.013 psi for the jet fuel (the worst case scenario) and the maximum combined diesel and

jet fuel throughput of 450,000,000 gal/yr.

**Local Requirements**
Rules of the EPCHC, Chapter 1-3 - Stationary Air Pollution and Ambient Air Quality Standards

**State Requirements**
Rule 62-296.320, F.A.C. - General Pollutant Emission Limiting Standards

**Federal NSPS Provisions**
40 CFR 60 - Subpart XX

**Federal NESHAP Provisions**
40 CFR 63 - Subpart BBBBBB

## 3. PRELIMINARY DETERMINATION

The Environmental Protection Commission of Hillsborough County (EPC) makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit. No air quality modeling analysis is required because the project does not result in a significant increase in emissions. Roger Zhu is the project engineer responsible for reviewing the application and drafting the permit. Additional details of this analysis may be obtained by contacting Roger Zhu or Diana M. Lee, P.E. Chief, Air Permitting, at (813) 627-2600 or by email at zhu@epchc.org or lee@epchc.org.

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PERMITTEE:
Kinder Morgan Liquids Terminals LLC (KMLT)
2101 GATX Drive
Tampa, FL 33605

Air Permit No. 0570085-030-AC
Permit Expires: 10/30/2017
Minor Air Construction Permit

Authorized Representative:
John J. McFadden, Operations Manager - Florida

KMLT, Tampa Terminal
Distillate Throughput Increase

This permit is being issued concurrently with DRAFT/PROPOSED Title V Renewal Permit No. 0570085-031-AV in order to increase the distillate fuel throughput at the truck loading racks. Permit No. 0570085-031-AV includes the combined public notice for both permits. This permit is issued pursuant to Section 403.087, Florida Statutes.

Any party to this order (permit) has the right to seek judicial review of the permit pursuant to Section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the EPC in the Legal Department at 3629 Queen Palm Dr, Tampa, FL 33619; 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 of Appeal must be filed within 30 days from the date this Notice is filed with the clerk of the EPC.

Executed in Hillsborough County, Florida.

ENVIRONMENTAL PROTECTION
COMMISSION OF HILLSBOROUGH COUNTY

DRAFT

Janet L. Dougherty
Executive Director

## CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Written Notice of Intent to Issue Air Permit package (including the Written Notice of Intent to Issue Air Permit, the Public Notice of Intent to Issue Air Permit, the Technical Evaluation and Preliminary Determination and the Draft Permit) was sent by electronic mail (or a link to these documents made available electronically on a publicly accessible server) with received receipt requested or by certified mail before the close of business on the date indicated below to the persons listed below.

John J. McFadden (JohnJ_McFadden@kindermorgan.com)
Christopher Fleck, P.E. (Christopher_Fleck@kindermorgan.com)
Kevin W. Golden, P.E. (kgolden@usienvironmental.com)
Barbara Friday, BAR [barbara.friday@dep.state.fl.us] (for posting with Region 4, U.S. EPA)

**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.

_____ _____
(Clerk) (Date)

DRAFT

**Facility Description.**

KMLT Tampa Terminal, is a bulk gasoline facility that handles gasoline, jet fuel, diesel fuel, biodiesel fuel, ethanol, additives, and other volatile organic products (VOLs). These products are delivered by ship, railcar or pipeline and stored in floating roof and fixed roof storage tanks. The products are subsequently loaded into railcars, trucks, or barges for shipment offsite or can be transferred offsite via pipeline. The operations at this facility include permitted storage tanks; a barge loading operation; four loading racks; a Vapor Recovery Unit (VRU); and an open flame flare unit (OFFU). The storage tanks (EUs 001, 002, 007, 008, 009, 013, and 015) include the gasoline floating roof group tanks, jet fuel group tanks, biodiesel group tanks, additive group tanks, PCW (Petroleum Contact Water) group tanks, ethanol group tanks, and miscellaneous group tanks. Each tank group is subject to various operating restrictions such as products stored and VOC emissions.

The facility has three loading racks: Truck Loading Racks T/T Area Nos. 2A, 3 and 7. Truck Loading Rack T/T Area No. 2A has four (4) loading arms. Truck Loading Rack T/T Area No. 2A is permitted to load biodiesel and other volatile organic products into trucks or railcars for shipment offsite. VOC emissions from the Truck Loading Rack T/T Area No. 2A are controlled using submerged filling techniques.

Truck Loading Rack T/T Area No. 3 has two (2) ethanol loading arms, three (3) jet fuel loading arms, and one (1) PCW loading arm to load products into trucks. Truck Loading Rack T/T Area No. 7 has five lanes. Lanes A, B and C each have eight (8) loading arms and Lanes D and E each have six (6) loading arms. Truck Loading Rack T/T Area No. 7 can load gasoline, ethanol, diesel, jet fuel, and PCW into trucks for shipment offsite. Gasoline may contain butane from butane blending system.

Truck Loading Racks T/T Area No. 3 and T/T Area No. 7 (EU 017) are controlled by submerged filling, and a Vapor Recovery Unit (VRU) and an open flame flare unit (OFFU). The VRU, a Jordan Technologies, Model JT-100100-1500 Dry VRU, is equipped with a Continuous Emissions Monitoring System (CEMS) to monitor VOC emissions. The VRU is operated as the primary control device. The OFFU, a John Zink Company, Model GV-LH-8400-2 open flame, air assisted flare unit, is operated as a back-up unit. The OFFU is used when the VRU is down for maintenance or repair and periodically to ensure the OFFU remains operational.

The VRU has two identical carbon adsorption beds. The carbon beds alternate on a timed cycle approximately every 15 minutes. The vacuum pump extracts the rich hydrocarbon vapors from the carbon absorption vessels and sends them to an absorption tower. In the absorber, fresh gasoline is used over packing to contact the vapor and condense the hydrocarbons. Liquid gasoline is pumped from a storage tank to the skid with a supply pump and distributed over the absorber packing. Liquid gasoline, including the condensed hydrocarbons, is returned to a storage tank using a return pump. During the absorption phase, a small stream of air and residual vapor exits the top of the absorption column and is recycled back into the carbon beds for adsorption.

In addition to being loaded into trucks, barges, and railcars, products can also be shipped offsite via pipeline to facilities within the Port of Tampa and to the Central Florida Pipeline (CFPL) Orlando Terminal. The CFPL 10" line carries jet and diesel fuel and continues from the Orlando Terminal to the Orlando International Airport. The CFPL 16" line typically carries gasoline and denatured ethanol but could be utilized to transfer jet fuel and diesel fuel. The KMLT Tampa Terminal, the CFPL Tampa Pump Station (located at the Tampa Terminal) and the CFPL Hemlock Pump Station (located at 1904 Hemlock St., Tampa, FL) are subject to 40 CFR 63 Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities. CFPL is a wholly owned subsidiary of KMLT. Because the Tampa and Hemlock Pump Stations are subject 40 CFR 63 Subpart BBBBBB, the equipment at the Tampa and Hemlock Pump Stations are included as part of this permit.

The Barge Loading Operation involves loading diesel fuel, jet fuel, biodiesel, additives, and other low volatile petroleum or organic liquids with a true vapor pressure equal to or less than 0.013 psia. VOC emissions from this operation are controlled using submerged filling techniques.

In addition, the facility is permitted to denature ethanol onsite. Neat ethanol (pure ethanol) is delivered by barge and small amounts of gasoline (typically between 1.99% and 2.49% as required by Federal regulation) are added to the ethanol to form denatured ethanol. A worst case of 5% gasoline has been established for the facility. The neat ethanol can be denatured in any of the tanks in the Ethanol Tank Group or in Tank No. 401. The denatured ethanol is then pumped to the Truck Loading Rack T/T Area No. 3 or Area No. 7 to be loaded into a truck, pumped to the Orlando Terminal via the CFPL 16" pipeline or pumped offsite via pipeline to facilities within the Port of Tampa.

**Summary of Emissions Unit (affected under this Permit).**

| EU No. | Brief Description |
|---|---|
| *Regulated Emissions Units* | |
| 017 | Truck Loading Racks T/T Area Nos. 3 and 7 |

**The following conditions apply facility-wide to all emission units and activities:**

**FW1.** **Not federally Enforceable.** 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.; and EPCHC Rule 1-3.22(3)]

**FW2.** General Particulate Emission Limiting Standards. General Visible Emissions Standard. Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity). EPA Method 9 is the method of compliance pursuant to Chapter 62-297, F.A.C. [Rule 62-296.320(4)(b)1. & 4., F.A.C.]

**FW3.** As requested by the permittee, in order to limit the potential to emit for VOC, and Hazardous Air Pollutants (HAP) emissions to be classified as an area source of HAP, which demonstrate compliance with 40 CFR 63 Subpart BBBBBB (Area Source NESHAP for Gasoline Distribution Facilities), the following limitations shall apply: [40 CFR 63.420(d) and 63.11081, Rules 62-210.200(PTE) and 62-4.070(3), F.A.C. and Permit Nos. 0570085-022/024/025/027/028-AC]

(a) The maximum facility wide volatile organic compound (VOC) emissions shall not exceed 195.4 tons per twelve consecutive month period.
(b) The hazardous air pollutant (HAP) as defined in Rule 62-210.200, F.A.C., emissions shall be less than 10 tons in any 12 consecutive month period for any individual HAP, or less than 25 tons in any 12 consecutive month period for any combination of HAP.
(c) Gasoline with an average annual MTBE (a HAP) content in excess of 4 percent, based on volumes of product accepted at the facility, shall not be handled.

**FW4.** General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload or use in any process or installation, volatile organic compounds (VOC) or organic solvents (OS) without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department or its delegated agent, the Environmental Protection Commission of Hillsborough County. [Rule 62-296.320(1), F.A.C.]

(a) Maintain tightly fitting cover, lids, etc. on all containers when they are not being handled, tapped, etc.
(b) Immediately attend to all spills/waste as appropriate.
(c) Operate the VRU when loading VOLs and operate the OFFU when the VRU is down for maintenance or repair.
(d) The VRU and OFFU shall be maintained in good working order.

**FW5.** Emissions of Unconfined Particulate Matter. Pursuant to Rules 62-296.320(4)(c)1., 3. & 4., F.A.C., reasonable precautions to prevent emissions of unconfined particulate matter at this facility include the following requirements: [Rule 62-296.320(4)(c), F.A.C.]

(a) Maintenance of parking areas and yards.
(b) Removal of particulate matter from paved areas, building, and work areas under the control of the owner/operator.

(c) Reduce vehicular speed. Post limits, if necessary.

**FW6.** Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information. [Rule 62-213.420(4), F.A.C.]

**FW7.** 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 requirement or permit condition is being violated, it may require the owner or operator of the source to conduct compliance tests which identify the nature and quantity of pollutant emissions from the source and to provide a report on the results of said tests to the Environmental Protection Commission of Hillsborough County. [Rules 62-297.310(7)(b) and 62-4.070(3), F.A.C.]

**FW8.** At least 15 days prior to the date on which each required emissions test is to begin, the owner or operator shall notify the EPC, unless shorter notice is agreed to by the EPC. 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 EPC a revised notification at least seven days prior to the re-scheduled emissions test date or arrange a re-scheduled test date with the EPC by mutual agreement. [Rule 62-297.310(9), F.A.C.]

**FW9.** Electronic Annual Operating Report and Title V Annual Emissions Fees. The information required by the Annual Operating Report for Air Pollutant Emitting Facility [Including Title V Source Emissions Fee Calculation] (DEP Form No. 62-210.900(5)) shall be submitted by April 1 of each year, for the previous calendar year, to the Department of Environmental Protection's Division of Air Resource Management. Each Title V source shall submit the annual operating report using the DEP's Electronic Annual Operating Report (EAOR) software, unless the Title V source claims a technical or financial hardship by submitting DEP Form No. 62-210.900(5) to the DEP Division of Air Resource Management instead of using the reporting software. Emissions shall be computed in accordance with the provisions of subsection 62-210.370(2), F.A.C. Each Title V source must pay between January 15 and April 1 of each year an annual emissions fee in an amount determined as set forth in subsection 62-213.205(1), F.A.C. The annual fee shall only apply to those regulated pollutants, except carbon monoxide and greenhouse gases, for which an allowable numeric emission-limiting standard is specified in the source's most recent construction permit or operation permit. Upon completing the required EAOR entries, the EAOR Title V Fee Invoice can be printed by the source showing which of the reported emissions are subject to the fee and the total Title V Annual Emissions Fee that is due. The submission of the annual Title V emissions fee payment is also due (postmarked) by April 1st of each year. A copy of the system-generated EAOR Title V Annual Emissions Fee Invoice and the indicated total fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. Additional information is available by accessing the Title V Annual Emissions Fee On-line Information Center at the following Internet web site: http://www.dep.state.fl.us/air/emission/tvfee.htm. [Rules 62-210.370(3), 62-210.900 & 62-213.205, F.A.C.; and, §403.0872(11), Florida Statutes (2013).]

**FW10.** 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: [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) The storage or handling of any products other than those authorized by this permit.
(d) An increase in product throughput.

*Not applicable to routine maintenance, repair, or replacement of component parts of an air emissions unit.

**FW11.** The use of property, facilities, equipment, processes, products, or compounds, or the commission of paint overspraying or any other act, that causes or materially contributes to a public nuisance is prohibited. [Hillsborough County Environmental Protection Act, Section 16, Chapter 84-446, Laws of Florida, as Amended.]

**FW12.** The permittee is required to meet the requirements of 40 CFR 80 – Regulation of Fuels and Fuel Additives. [40 CFR Part 80]

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This section addresses EU 004 and EU 017 listed below. Emissions from EU 017 is controlled by the VRU, and an open flame flare unit (OFFU) operated as a back-up unit.

| EU No. | Brief Description |
|---|---|
| 004 | Truck Loading Rack T/T Area No. 2A |
| 017 | Truck Loading Racks T/T Area Nos. 3 and 7 |

**1.** The maximum combined annual throughput of products through Truck Loading Racks T/T Area No. 3 and Area No. 7 shall not exceed the following per any twelve consecutive month period:
[Rule 62-4.070(3), F.A.C., Permit No. 0570085-022-AC and Application No. 0570085-030-AC]

| | Maximum Annual Throughput, gallons | Maximum Annual Average True Vapor Pressure of Liquid, psia |
|---|---|---|
| Combined Gasoline/Ethanol | 1,200,000,000 | N/A |
| Combined Distillates (Diesel/Jet Fuel) | 450,000,000 | 0.013 |
| PCW | 1,000,000 | 7.4 |

**2.** The maximum combined annual throughput of product through Truck Loading Racks T/T Area No. 2A shall not exceed the following per any twelve consecutive month period:
[Rule 62-4.070(3), F.A.C. and Permit No. 0570085-022-AC]

| Product | Maximum Annual Throughput, gallons | Maximum Annual Average True Vapor Pressure of Liquid, psia |
|---|---|---|
| Biodiesel Loaded Into Trucks | 65,000,000 | 0.013 |
| Biodiesel Loaded Into Railcars | 2,000,000 | 0.013 |
| Other VOL Loaded Into Trucks or Railcars | 9,500,000 | 0.64 |

**3.** In order to limit the potential to emit, the maximum combined potential VOC emissions for Truck Loading Racks T/T Area No. 3 and T/T Area No. 7 (EU 017) shall not exceed 93.6 tons per twelve consecutive month period, of which 40.0 tons are from fugitive emissions associated with truck loading based on 8 mg/l of gasoline loaded into gasoline tanker trucks.
[Rules 62-210.200(239) and 62-4.070(3), F.A.C. and Permit No. 0570085-022-AC]

**4.** The maximum allowable VOC emissions from product loading at the Truck Loading Racks T/T Area No. 3 and T/T Area No. 7 (EU 017), which is controlled by the VRU or the OFFU, shall not exceed 10 milligrams per liter of gasoline loaded into gasoline tanker trucks.
[Rules 62-210.200(239) and 62-4.070(3), F.A.C. and Permit No. 0570085-022-AC]

**5.** All vapors displaced during product loading into the tanker trucks at the Truck Loading Racks T/T Area No. 3 and T/T Area No. 7 with the exception of PCW shall be directed to the VRU or the OFFU. All products dispensed (including PCW) by Truck Loading Racks T/T Area No. 2A, and T/T Area No. 3 shall be submerged filling (bottom loading). The EPC finds submerged filling techniques as known and existing vapor emissions controls.
[Rule 62-4.070(3), F.A.C., and Permit Nos. 0570085-015/022-AC]

**6.** The permittee shall comply with the following requirements of 40 CFR 60 Subpart XX – *Standards of Performance for Bulk Gasoline Terminals* for Truck Loading Racks T/T Area No. 3 and T/T Area No. 7 and associated equipment (EU 017):

[40 CFR 60.502, Rule 62-4.070(3), F.A.C., and Permit Nos. 0570085-020/022-AC]

A) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. [40 CFR 60.502(d)]

B) Loading of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures: [40 CFR 60.502(e)]

i) The permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) (Specific Condition No. 15.) for each gasoline tank truck which is to be loaded at the affected facility.

ii) The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.

iii) The permittee shall cross-check each tank identification number obtained in paragraph (ii) above with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.

iv) The permittee shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the affected facility within 3 weeks after the loading has occurred.

v) The permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.

C) The permittee shall act to assure that the loadings of gasoline tank trucks are made only into tanks equipped with vapor collection equipment that is compatible with facility's vapor collection system. [40 CFR 60.502(f)]

D) The permittee shall act to assure that the facility's and tank truck's vapor collection systems are connected during each loading of a gasoline tank truck. Examples of actions to accomplish this include training drivers in hookup procedures and posting visible reminder signs at the loading rack. [40 CFR 60.502(g)]

E) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4500 pascal (450 mm of water) during product loading when measured by the procedure specified in 40 CFR 60.503(d) (Specific Condition No. 14). If the pressure exceeds 4500 pascal (450 mm of water) then it shall be considered a deviation. In the event of a deviation, the facility shall immediately shut down the VRU or OFFU and cease loading product. Notify the Environmental Protection Commission of Hillsborough County within 24 hours of the problem. The VRU and/or OFFU shall not be operated until the problem is corrected. A written explanation and the corrective actions implemented shall be submitted in the quarterly excess emissions report required in Specific Condition 8. [40 CFR 60.502(h)]

F) No pressure vacuum vent in the bulk petroleum products terminal's vapor collection system shall begin to open at a system pressure less than 4500 pascal (450 mm of water). [40 CFR 60.502(i)]

G) 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 purpose 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. [40 CFR 60.502(j)]

**7.** Operation of the OFFU system is subject to the following requirements:
[40 CFR 60.18, Rule 62-4.070(3), F.A.C., and Permit Nos. 0570085-020/022-AC]

A) The OFFU shall be operated with no visible emissions as determined by Method 22 except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. [40 CFR 60.18(c)(1)]

B) The OFFU shall be operated with a flame present at all times. The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. [40 CFR 60.18(f)(2)]

C) The permittee shall not operate the OFFU if the net heating value of the gas being combusted is less than 300 Btu/SCF. [40 CFR 60.18(c)(3)]

D) The permittee shall not operate the OFFU with an exit velocity greater than $V_{max}$ as determined by the following equation: [Rule 40 CFR 60.18(f)(6)]

$$V_{max} = 8.706 + 0.7084\ (H_T)$$

$V_{max}$ = Maximum Permitted Velocity (M/S)
$H_T$ = The net heating value as determined by the procedures as outlined in 40 CFR 60.18(f)(3).

**8.** Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. No trucks shall be hooked up for filling once the equipment or process failure is recognized. Truck loading shall restart only after the malfunction is completely resolved. The permittee shall notify the Environmental Protection Commission of Hillsborough County within twenty-four (24) hours of any malfunction, reporting the problem and the duration of excess emissions. The permittee shall submit a quarterly excess emissions report within 45 days of the end of every calendar quarter to the Environmental Protection Commission of Hillsborough County. This report can be submitted electronically to the Air Management Division, Air Compliance Section.
[Rule 62-210.700, F.A.C. and Permit Nos. 0570085-020/022-AC]

**9.** Truck Loading Racks T/T Area No. 3 and T/T Area No. 7 controlled by the VRU and the OFFU are subject to the CAM requirements as specified in the Appendix CAM attached to the Title V Operation Permit.
[Rules 62-4.070(3) and 62-213.440(1)(b)1.a., F.A.C. and 40 CFR 64.1]

**10.** The temperature at the pilot flame of the OFFU shall be continuously monitored when in operation. A failsafe system shall shut down Truck Loading Racks T/T Area No. 3 and No. 7 if the temperature does not reach a minimum of 500° F within 90 seconds of commencing operation of the OFFU. The pressure in the vapor recovery line shall be continuously monitored when in operation. A failsafe system shall shut down Truck Loading Racks T/T Area No. 3 and T/T Area No. 7 (during gasoline/ethanol loading) if the pressure in the vapor recovery line increases above 18" of water column during operation.
[Rule 62-4.070(3), F.A.C. and Permit No. 0570085-022-AC]

**11.** Test Methods. Required tests shall be performed in accordance with the following reference methods:

| Method | Description of Method and Comments |
|---|---|
| 2 | Determination of stack gas velocity and volumetric flow rate (Type S pitot tube) |

| Method | Description of Method and Comments |
|---|---|
| 2A | Direct measurement of gas volume through pipes and small ducts |
| 2B | Determination of exhaust gas volume flow rate from gasoline vapor incinerators |
| 2C | Determination of gas velocity and volumetric flow rate in small stacks or ducts (standard pitot tube) |
| 2D | Measurement of gas volume flow rates in small pipes and ducts |
| 18 | Measurement of gaseous organic compound emissions by gas chromatography |
| 21 | Determination of volatile organic compound leaks |
| 22 | Visual determination of fugitive emissions from material sources and smoke emissions from flares |
| 25A | Determination of total gaseous organic concentration using a flame ionization analyzer |
| 25B | Determination of total gaseous organic concentration using a nondispersive infrared analyzer |
| 27 | Determination of vapor tightness of gasoline delivery tank using pressure-vacuum test |

- The above methods are described in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-204.800, F.A.C.
- In accordance with the USEPA letter dated January 5, 2016, the EPA approved the use of the Infrared Industries IR 208DC NDIR technology at this facility, as a testing alternate to the combination of Method 25B and Method 18 to measure total nonmethane gaseous organic compound emissions from the gasoline loading racks. This letter contains the specific requirements for conducting the testing alternative (a copy of the letter is contained in the Appendices).
- No other methods may be used unless prior written approval is received from the Department.

[40 CFR 60.18, 40 CFR 60.503, Rules 62-4.070(3) and 62-297.440(2)(b), F.A.C., and Permit No. 0570085-022-AC]

**12.** Compliance with 40 CFR 60.502(b) and Specific Condition No. 4. shall be determined using EPA Methods 2, 2A, 2B, 2C, or 2D as appropriate, 18, 21, 22, 25A or 25B, and 27 as listed below and as contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297, F.A.C. Two copies of the test data shall be submitted to the Air Management Division of the Environmental Protection Commission of Hillsborough County office within 45 days of such testing. Failure to submit the input rate or operation at conditions during testing which do not reflect actual operating conditions may invalidate the test. Testing shall be conducted while loading a typical mix of products. [40 CFR 60.18, 40 CFR 60.503, Rules 62-4.070(3), 62-297.310(8)(a)5 and (8)(b)1., and 62-297.440(2)(b), F.A.C., and Permit No. 0570085-022-AC]

A) Test the loading rack system and the inlet and outlet of the VRU for VOC emissions, prior to the renewal application due date.

B) The permittee shall conduct a performance evaluation of the CEMS in accordance with the specifications and procedures of 40 CFR 63.7, 40 CFR 63.8, and Appendix B of 40 CFR 60. The performance evaluation shall be performed annually, however, the results of the performance evaluation do not have to be submitted to the EPCHC. The results of the performance evaluation shall be maintained onsite for at least five years and shall be made available upon request by any local, state, or federal air pollution control agency.

C) Test the loading rack system and the OFFU for opacity, inlet vapor net heat value, and actual velocity, prior to the renewal application due date. In the event that the OFFU is operated more than 50% of the loading rack throughput in any calendar year, then the OFFU shall be tested within 90 days of operating over 50% of the loading rack throughput for that calendar year.

D) The EPA Method 22 observation period shall be at least two hours in duration. The facility shall conduct daily visible observations on the OFFU (when in operation) and maintain a record of the date, time, observer, and results of the observations.

E) The concentration and net heating value of the gas being combusted shall be determined using methodology described in 40 CFR 60.18(f), utilizing EPA Method 18 consisting of 3 runs equally spaced over the test specified in E) below.

F) The performance test for the VRU and the OFFU shall be 6 hours long during which at least 80,000 gallons (302,800 liters) of gasoline shall be loaded during the test. If this is not possible, the test may be continued the same day until 80,000 gallons (302,800 liters) 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 (302,800 liters) 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.

G) To determine the volume (L) of gasoline dispensed during the test period 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.

**13.** Immediately before the performance test required to determine compliance with 40 CFR 60.502(b) and (h) (Specific Condition Nos. 4. and 6.E.), the permittee shall use EPA Method 21 to monitor for leakage of vapor from all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The permittee 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 Permit No. 0570085-022-AC]

**14.** The permittee shall determine compliance with the standard in 40 CFR 60.502(h) (Specific Condition A.6.E)) as follows: [40 CFR 60.503(d), Rule 62-4.070(3), F.A.C., and Permit No. 0570085-022-AC]

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

B) During the performance test as required in Specific Condition No. 12, 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(d)(1) and (2)]

**15.** The tank truck vapor tightness documentation required in 40 CFR 60.502(e)(1) (Specific Condition No. 6) shall be kept on file for at least 5 years, in a permanent form available for inspection. The documentation file for each gasoline tank truck 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 information: [40 CFR 60.505(a) and (b), Rule 62-4.070(3), F.A.C., and Permit No. 0570085-022-AC]

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)

**16.** A record of each monthly leak inspection required under 40 CFR 60.502(j) (Specific Condition No. 6.G)) shall be kept on file at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following information and shall be made available upon request to the Environmental Protection Commission of Hillsborough County, state, and federal officials: [40 CFR 60.505(c) and Rules 62-213.440(1)(b)2.b. and 62-4.070(3), F.A.C.]

A) Date of inspection.
B) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
C) Leak determination method.
D) Corrective action (date each leak repaired; reasons for repair interval in excess of 15 days)
E) Inspector name and signature.

**17.** The permittee shall keep documentation of all notifications required by 40 CFR 60.502(e)(4) (Specific Condition No. 6.B)) on file at the facility for at least five (5) years.
[40 CFR 60.505(d) and Rules 62-213.440(1)(b)2.b. and 62-4.070(3), F.A.C.]

**18.** The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least five years.
[40 CFR 60.505(f), Rules 62-213.440(1)(b)2.b. and 62-4.070(3), F.A.C., and Permit No. 0570085-022-AC]

**19.** Compliance with the limitations of Specific Condition Nos. 1 and 2 shall be demonstrated through the use of a monthly recordkeeping system for the loading racks. The recordkeeping system shall contain the following information and shall be made available to the Environmental Protection Commission of Hillsborough County, state and federal officials upon request. The records shall be maintained for the most recent five year period. [Rule 62-213.440(1)(b)2.b. and 62-4.070(3), F.A.C.]

A) Month, Year
B) Rack Number(s)
C) Individual Product Throughput (gallons)
D) The type of control device in operation during loading (VRU or OFFU)
E) Average Product Vapor Pressure (psia)
F) Calculated VOC Emissions (tons)
G) Rolling 12 Month Total for Items C) and F) Above

**20.** The pollution control equipment (VRU, OFFU, and bottom loading equipment) shall be maintained in good repair to perform adequately the function for which it was intended. Maintenance shall include, but is not limited to, bi-weekly inspections and replacement or repair of faulty equipment when necessary or as required by the manufacturer. Any maintenance/repair performed should be recorded. Records shall be maintained for the most recent five (5) year period and made available for inspection upon request.
[Rules 62-4.070(3) and 62-213.440(1)(b)2.b., F.A.C. and Permit No. 0570085-022-AC]