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ENVIRONMENTAL PROTECTION COMMISSION OF
HILLSBOROUGH COUNTY, as Delegated by

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOTICE OF PERMIT

Mary Whitaker
Motiva Enterprises, LLC
6500 West Commerce St.
Tampa, FL 33616

Re: Hillsborough County - AP

Dear Ms. Whitaker:

Enclosed is Permit Number 0570197-022-AC to authorize the optimization of the Vapor Recovery Unit by installing a new heat exchanger that includes a chiller system and a pump and to install to a portable vapor combustion unit (VCU), 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 Drive, 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 Tampa, Florida

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Jerry Campbell /for

Richard D. Garrity, Ph.D.
Executive Director

RDG/LAW/law

cc: Florida Department of Environmental Protection (posting online)
Mike Waller, P.E. - Environmental Consulting & Technology, Inc. (via email)

CERTIFICATE OF SERVICE

The undersigned duly designated clerk hereby certifies that this INTENT TO ISSUE and all copies were mailed before the close of business on 6/24/15 to the listed persons.

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

Patricia S. Ross 6/24/15
Clerk Date

FINAL DETERMINATION

FOR

Motiva Enterprises, LLC

Hillsborough County

Air Construction Permit

Application Number

0570197-022-AC

Environmental Protection Commission of

Hillsborough County

Tampa, FL

June 24, 2015

FINAL DETERMINATION

The Environmental Protection Commission of Hillsborough County mailed a public notice package on May 22, 2015 that included an Intent to Issue Permit No. 0570197-022-AC to Motiva Enterprises, LLC. The facility is located at 6500 West Commerce St., Tampa, FL, Hillsborough County, FL, 33616. This permit authorizes the optimization of the Vapor Recovery Unit by installing a new heat exchanger that includes a chiller system and a pump and authorizes the installation of a portable vapor combustion unit (VCU).

The Public Notice of Intent to Issue was published in the Tampa Bay Times on June 5, 2015.

COMMENTS/CHANGES

On June 3, 2015, the facility submitted three comments via email. Listed below is each comment and a response to each in the order that the comment was received. The comment(s) will not be restated but are summarized. The comments do not result in significant changes to the Draft Permit. Therefore, another Public Notice is not required.

Comment No. 1: The wording of Condition No. A.4 states that the allowable emissions (10 mg/l gasoline loaded) pertain to the loading rack rather than from the control devices (VRU or VCU). Motiva requests that this condition be modified to indicate that this factor does not include fugitive emissions from truck loading (which are calculated separately through the use of an emission factor).

Response: The condition is changed as follows to maintain consistency with the requirements specified in 40 CFR 60 Subpart XX.

From:
A.4. The maximum allowable VOC emissions from the loading rack shall not exceed 10 milligrams per liter of gasoline loaded into tanker trucks. [Rules 62-212.300 and 62-296.510, F.A.C., 40 CFR 60.502(b) and (c) and Permit No. 0570197-009-AC]

To:
A.4. The maximum allowable VOC emissions from the loading rack's *vapor collection/control system* shall not exceed 10 milligrams per liter of gasoline loaded into tanker trucks. [Rules 62-212.300 and 62-296.510, F.A.C., 40 CFR 60.502(b) and (c), and Permit No. 0570197-009-AC]

Comment No. 2: Condition No. A.10.C) requires Motiva to conduct a performance test of the existing VCU in each calendar year that it operates 500 hours or more. Motiva requests that this condition be modified to require that the test be performed no later than March 31 of the following year. This will provide the time needed following the end of the year to arrange for a testing contractor and to provide the 60 day pre-notification required by 40 CFR 63 Subpart BBBBBB to the EPC if a test is required.

Response: In order to provide operational flexibility to Motiva, Specific Condition Nos. A.10.C) and A.11 are revised as follows to specify that the test shall be performed within 90 days of reaching 500 hours of operation.

From:

A.10. Test Methods and Required Compliance Tests.

D) Test the VCU each calendar year that it operates five hundred (500) hours or more. If the VCU has not had a compliance test conducted during the five year renewal cycle, then the VCU shall be tested at least 60 days prior to submitting the permit renewal application.

A.11. In addition to the testing specified in Specific Condition No. A.10., test the Portable VCU for VOC emissions each calendar year that the Portable VCU operates at this facility for five hundred (500) hours or more. [Rule 62-4.070(3) and 62-210.200(PTE), F.A.C.]

To:
A.10. Test Methods and Required Compliance Tests.

D) Test the VCU each calendar year that it operates five hundred (500) hours or more. *The test shall be performed within 90 days of reaching the five hundred (500) hours of operation.* If the VCU has not had a compliance test conducted during the five year renewal cycle, then the VCU shall be tested at least 60 days prior to submitting the permit renewal application.

A.11. In addition to the testing specified in Specific Condition No. A.10., test the Portable VCU for VOC emissions each calendar year that the Portable VCU operates at this facility for five hundred (500) hours or more. *The test shall be performed within 90 days of reaching the five hundred (500) hours of operation.* [Rule 62-4.070(3) and 62-210.200(PTE), F.A.C.]

Comment No. 3: In Condition No. A.9, the reference to Specific Condition FW16 should be changed to FW15. In addition, in Condition No. A. 17, the reference to Specific Condition A.5 should be changed to A.6.

Response: The references have been updated as requested.

CONCLUSION

The final action of the Environmental Protection Commission of Hillsborough County is to issue the permit as drafted with the changes noted above.

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PERMITTEE:
Motiva Enterprises, LLC
6500 West Commerce St.
Tampa, FL 33616

PERMIT/CERTIFICATION
Permit No.: 0570197-022-AC
County: Hillsborough
Expiration Date: October 31, 2016
Project: Vapor Recovery Unit Upgrade and Portable Vapor Combustion Unit

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 62-204, 62-210, 62-212, 62-296, 62-297, and 62-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the EPC and made a part hereof and specifically described as follows:

This permit authorizes optimization of the Vapor Recovery Unit by installing a new heat exchanger that includes a chiller system and a pump. This permit also authorizes installation of a portable vapor combustion unit (VCU).

Motiva's Bulk Gasoline Terminal consists of 1) twenty petroleum liquid storage tanks for storage and handling of gasoline, ethanol, ethanol-gasoline blends, jet kerosene, diesel, other distillate products, and additives; and 2) a truck loading rack with three loading bays. VOC emissions from the truck loading rack are primarily controlled by a John Zink VRU. The backup control device is a John Zink Company VCU, Model # ZCT-2-8-35-2-316-X. Emissions may also be controlled by the Portable VCU.

The heat exchanger system on the VRU will consist of a closed loop of water that will be used to cool the gasoline absorbent going into the VRU. Water will be pumped through the mechanical chiller where it will cool the water down to approximately 72 F. The cooled water will then be circulated to a heat exchanger on the VRU absorbent supply line prior to the absorbent entering the VRU. The heat exchanger will cool the gasoline absorbent down to a temperature that will provide an absorbent with a true vapor pressure of 9 psia or less to the VRU. The cooling water from the heat exchanger will then be circulated to a surge tank to maintain the minimum loop volume required by the chiller system. This system is expected to optimize the operation of the VRU, resulting in the VRU being able to operate for a longer period of time before having to shut down for cooling.

Motiva will also operate a Portable VCU to supplement the existing VCU if the VRU has to be shut down for more than routine short-term maintenance. The Portable VCU may also serve as the primary control unit if an emergency temporarily shuts down the VRU and/or the existing VCU. The Portable VCU may be rented from a third party company or borrowed from another terminal owned by Motiva. The make and model number of the Portable VCU may change as long as the

specifications in the permit are met. In addition, the Portable VCU may have propane gas assist. The 1,000 gallon propane tank and the 500 gal propane tank that provide assist gas to the VCU will also provide the propane assist gas to the Portable VCU.

Location: 6500 West Commerce St., Tampa, FL 33616

UTM: 17-348.03 E 3082.41 N NEDS NO: 0197

Emission Unit Nos.:
002 - Loading Rack w/ Vapor Recovery Unit, Vapor Combustion Unit, and Portable Vapor Combustion Unit

References Permit No.: 0570197-009-AC, 0570197-014-AC, and 0570197-021-AC

Replaces Permit No.: NA

SPECIFIC CONDITIONS:

The following conditions apply facility-wide:

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. Prevention of Accidental Releases (Section 112(r) of CAA). If and when the facility becomes subject to 112(r), the permittee shall:

A) Submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to: RMP Reporting Center, Post Office Box 10162, Fairfax, VA 22038, Telephone: (703) 227-7650.
B) Submit to the permitting authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), F.A.C.[40 CFR 68]

FW4. As requested by the permittee, in order to limit the potential to emit for both criteria and Hazardous Air Pollutants (HAP), the following potential emission limitations shall apply for any 12 consecutive month period: [Rules 62-210.200 and 62-4.070(3), F.A.C., Permit No. 0570197-021-AC]

A) 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, and less than 25 tons in any 12 consecutive month period for any combination of HAPs.
B) The permittee shall not handle gasoline oxygenated using MTBE.

FW5. 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. and Permit No. 0570197-009-AC]

SPECIFIC CONDITIONS:

A) Maintaining tightly fitting covers, lids, etc., on all containers when they are not being handled, tapped, etc.
B) Where possible and practical, procuring/fabricating a tightly fitting cover for any open trough, basin, etc., of VOC so that it can be covered when not in use.
C) Immediately attending to all spills/waste as appropriate.

FW6. 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. and Permit No. 0570197-009-AC]

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.

FW7. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., F.A.C., shall be submitted to the Department and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), F.A.C. [Rules 62-213.440(3) and 62-213.900, F.A.C.]

FW8. The permittee shall submit all compliance related notifications and reports required of this permit to the Environmental Protection Commission of Hillsborough County office.

Environmental Protection Commission of Hillsborough County
Air Management Division
3629 Queen Palm Drive
Tampa, FL 33619-1309
Telephone: 813-627-2600; Fax: 813-627-2660

FW9. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency, Region 4, should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air and EPCRA Enforcement Branch
Air Enforcement Section
61 Forsyth Street
Atlanta, Georgia 30303-8960
Telephone: 404/562-9155; Fax: 404/562-9163

SPECIFIC CONDITIONS:

FW10. 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.]

FW11. 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.]

FW12. 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.]

FW13. 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).]

FW14. 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.

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

FW15. Monitoring Reports. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. [Rule 62-213.440(1)(b)3.a., F.A.C.]

FW16. 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.]

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.]

FW18. Multiple emissions units at this facility are subject to the NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities and Gasoline Dispensing Facilities, 40 CFR 63, Subpart BBBBBB, which is attached as part of this permit under Appendix 40 CFR 63, Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities and Gasoline Dispensing Facilities). The permittee shall comply with all applicable requirements from that rule including the standards in Tables 1, 2 and 3 of the subpart. [Rule 62-4.070(3), F.A.C.; 40 CFR 63.11081, and Permit No. 0570197-021-AC]

FW19. A minimum of two copies of a TV revision operating permit application along with a CAM plan

for the Portable VCU shall be submitted to the Environmental Protection Commission of Hillsborough County within 90 days of completion of construction of the optimization of the VRU or at least 90 days prior to the expiration date of this permit, whichever occurs first. [Rules 62-4.050(2) and 62-4.090, F.A.C.]

Conditions Specific to EU 002 - Loading Rack with Vapor Recovery Unit (VRU), Vapor Combustion Unit (VCU), and Portable VCU

Essential Potential to Emit (PTE) Parameters

A.1. Permitted Capacity. The maximum annual throughput of petroleum product shall not exceed 695,053,000 gallons per any twelve consecutive month period. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C.; and Permit No. 0570197-014-AC]

A.2. Methods of Operation. All vapors displaced during product loading into the tanker trucks (T/T) shall be routed to the VRU, the VCU, or the Portable VCU. The VRU shall operate as the primary control device and the VCU and Portable VCU should be used as a backup units as necessary. The vapor collection system, the VRU, the VCU, and the Portable VCU shall be maintained in good working order. All loading and vapor lines equipped with fittings shall be vapor tight. The permittee shall ensure that a means is provided to prevent liquid waste from the loading device to exceed the quantity specified for the self sealing coupler or adapter according to API regulation RP 1004 (or equivalent) upon the loading device being disconnected or when it is not in use. [Rule 62-213.410 and 62-296.510, F.A.C., 40 CFR 60.502(a), Construction Permit Nos. 0570197-014-AC, -019-AC, and -021-AC]

A.3. Hours of Operation. The hours of operation for this emission unit are not restricted. [Rule 62-210.200(PTE), F.A.C., and Construction Permit No. 0570197-014-AC]

Emission Limitations and Standards

A.4. The maximum allowable VOC emissions from the loading rack's vapor collection/control system shall not exceed 10 milligrams per liter of gasoline loaded into tanker trucks. [Rules 62-212.300 and 62-296.510, F.A.C., 40 CFR 60.502(b) and (c), and Permit No. 0570197-009-AC]

A.5. The maximum potential VOC emissions for the truck loading rack shall not exceed 66.7 tons per any twelve consecutive month period. [Rule 62-4.070(3), F.A.C. and Permit No. 0570197-009-AC]

A.6. The permittee shall comply with the following requirements of Subpart XX - Standards of Performance for Bulk Gasoline Terminals:

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)]

SPECIFIC CONDITIONS:

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)]

1. The permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) (Specific Condition No. A.17) for each gasoline tank truck which is to be loaded at the affected facility.
2. The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.
3. The permittee shall cross-check each tank identification number obtained in paragraph (2) above with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.
4. The permittee shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross-check in paragraph (3) above.
5. 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.
6. In order to comply with paragraphs 3. and 5. above, the permittee is allowed to use a terminal automation system to cross-check and lock out trucks with expired vapor tightness documentation.

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. A.14). The pressure shall be monitored and recorded daily. If the pressure exceeds 4500 pascal (450 mm of water) then it shall be considered an exceedance. In the event of an exceedance, the facility shall immediately shut down the VRU and divert the collected vapors to the VCU or Portable VCU, or cease loading product. Notify the Environmental Protection Commission of Hillsborough County within 24 hours of the problem. The unit shall not be operated until the problem is corrected and a written explanation and the corrective actions implemented shall be submitted in the semi-annual monitoring report required in Specific Condition No. A.9. [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)]

A.7. In addition to the requirements of Specific Condition No. A.6., the following limitations shall apply to the Portable VCU: [Rule 62-4.070(3), F.A.C.]

a. The Portable VCU shall be equipped with a device to monitor the presence of a pilot flame.
b. If the pilot flame presence is not detected, all vapors shall be automatically routed to the VRU or VCU, as long as it is fully functional, or the loading operation shall be automatically shutdown.

A.8. Monitoring Requirements. In order to demonstrate compliance with 40 CFR 63 – Subpart BBBBBB, the permittee shall install, operate and maintain a continuous emission monitoring system (CEMS) on the outlet of the VRU. The CEMS shall be operated in accordance with the manufacturer's specifications and be used to demonstrate compliance with the VOC emission limitation from Specific Condition No. A.4 by developing an equivalent hydrocarbon concentration to be monitored following each stack test performed on the VRU. The vapor processing system shall be operated in a manner not to exceed this equivalent hydrocarbon concentration. The monitored operating parameter shall be re-established and reported with each annual VOC compliance stack test report. The CEMS shall be operated and maintained in accordance with 40 CFR 63 – Subpart A, as applicable, based on 40 CFR 63 – Subpart BBBBBB. [Rule 62-4.070(3), F.A.C.; 40 CFR 63.8 and 40 CFR 63.11092; and Permit No. 0570197-021-AC]

A.9. Excess Emissions. 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 include all excess emissions over the past six (6) months in the semi-annual monitoring report, as required by Specific Condition No. FW15, and submit the reports to the Environmental Protection Commission of Hillsborough County. [Rules 62-210.700 and 62-213.440(1)(b)3.b., F.A.C.]

Test Methods and Procedures

A.10. Test Methods and Required Compliance Tests. Compliance with Specific Condition Nos. A.4., A.5., A.6. and A.8. shall be determined using EPA Methods 2, 2A, 2B, 2C, or 2D as appropriate, 21, 25A or 25B, and 27 as contained in 40 CFR 60, Appendix A, and adopted by reference in Rule 62-297, F.A.C. as listed below. 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. Testing shall be conducted while loading a typical mix of products. Failure to submit the gasoline

throughput rate and the pressure drop and temperature across the Vapor Processing Unit operation at conditions during testing which do not reflect actual operating conditions may invalidate the data. [Rules 62-4.070(3), 62-296.510, 62-297.310 and 62-297.440, F.A.C.; 40 CFR 63 – Subpart BBBBBB (Table 3) and 40 CFR 63.8; and Permit No. 0570197-021-AC]

E) Test the VRU and liquid loading equipment for VOC emissions annually once per calendar year (January 1 – December 31).
F) In conjunction with the annual VOC test on the VRU, perform a Relative Accuracy Test Audit (RATA) on the CEMS unit to verify compliance with the performance specification requirements from 40 CFR 60 - Appendix B (Performance Specification 8).
G) Test the VCU each calendar year that it operates five hundred (500) hours or more. The test shall be performed within 90 days of reaching the five hundred (500) hours of operation. If the VCU has not had a compliance test conducted during the five year renewal cycle, then the VCU shall be tested at least 60 days prior to submitting the permit renewal application.

A.11. In addition to the testing specified in Specific Condition No. A.10., test the Portable VCU for VOC emissions each calendar year that the Portable VCU operates at this facility for five hundred (500) hours or more. The test shall be performed within 90 days of reaching the five hundred (500) hours of operation. [Rule 62-4.070(3) and 62-210.200(PTE), F.A.C.]

A.12. Pre-Testing Requirements. Immediately before the performance test required to determine compliance with 40 CFR 60.502(b), (c), and (h) (Specific Condition Nos. A.4., and A.6.), 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)]

A.13. Testing Requirements. The permittee shall determine compliance with the standards in 40 CFR 60.502(b), (c) (Specific Condition No. A.4.) and Rule 62-297.440, F.A.C. as follows:

A) The performance test shall be at least 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 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-liter 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. [40 CFR 60.503(c)(1) and Rule 62-297.440(2)(b), F.A.C.]

B) 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, 1.83×10^6 for propane and 2.41×10^6 for butane, mg/scm

C) The performance test for the vapor collection system 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 compound 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. [40 CFR 60.503(c)(4)]

D) The following methods shall be used to determine the volume (V_{esi}) air-vapor mixture exhausted at each interval: [40 CFR 60.503(c)(5)]

1. Method 2B shall be used for the VCU and the Portable VCU.
2. Method 2A shall be used for the VRU.

E) Method 25A or 25B shall be used for determining the total organic compounds concentration (C_{ei}) at each interval. The calibration gas 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. [40 CFR 60.503(c)(6)]

F) 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. [40 CFR 60.503(c)(7)]

A.14. The permittee shall determine compliance with the standard in 40 CFR 60.502(h) (Specific Condition No. A.6.E.) as follows: [40 CFR 60.503(d)(1)&(2)]

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 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.

B) During the performance test as required in Specific Condition No. A.13, 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.

A.15. CAM Plan. This emissions unit is subject to the Compliance Assurance Monitoring (CAM) requirements specified in Permit No. 0570197-020-AV. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; and Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Recordkeeping and Reporting Requirements

A.16. Records of the monitored data from the CEMS shall be collected and compiled in a data acquisition system and made available to the EPC upon request. The records shall be maintained for a minimum of 5 years. [Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C.; 40 CFR 63 – Subpart BBBBBB (Table 3) and 40 CFR 63.10; and Permit No. 0570197-021-AC]

A.17. The tank truck vapor tightness documentation required in 40 CFR 60.502(e)(1) (Specific Condition No. A.6.) shall be kept on file 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)&(b)]

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)

A.18. A record of each monthly leak inspection required under 40 CFR 60.502(j) (Specific Condition No. A.6.) shall be kept on file at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following information: [40 CFR 60.505(c) and Rule 62-213.440, 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.

A.19. The permittee shall keep documentation of all notifications required by 40 CFR 60.502(e)(4) (Specific Condition No. A.6.) on file at the facility for at least five (5) years. [40 CFR 60.505(d) and Rule 62-213.440, F.A.C.]

SPECIFIC CONDITIONS:

A.20. 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) and Rule 62-213.440, F.A.C.]

A.21. The permittee shall maintain a monthly recordkeeping system as follows in order to ensure compliance with Specific Condition Nos. A.1 and A.5., and maintain the records for a minimum of 5 years. The records shall be made available upon request to the Environmental Protection Commission of Hillsborough County, state, or federal air pollution agency for inspection. The records shall include, but not limited to, the following: [Rules 62-4.070(3) and 62-213.440(1)(b)2., F.A.C.; and Permit Nos. 0570197-009-AC, 014-AC, and 021-AC]

A) Month, Year
B) Products Loaded
C) Product Throughput (gallons)
D) Most recent twelve month rolling totals for item C) above
E) Twelve month rolling total of VOC and HAP emissions
F) The hours of operation of the VCU
G) The hours of operation of each Portable VCU that is brought onsite.
H) The make and model number of each Portable VCU brought onsite.
I) Rolling twelve month total of F) and G)

NESHAP, Subpart BBBBBB, Requirements

A.22. The loading rack and control system are subject to the NESHAP for Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities and Gasoline Dispensing Facilities, 40 CFR 63, Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, Pipeline Facilities and Gasoline Dispensing Facilities). The permittee shall comply with all applicable requirements from that rule including the standards in Tables 1, 2 and 3 of the subpart. [Rule 62-4.070(3), F.A.C., 40 CFR 63.11081, and Permit No. 0570197-021-AC]

A.23. The permittee shall comply with 40 CFR Part 63, Subpart A - General Provisions. [Rule 62-204.800(10)(d), F.A.C. and Permit No. 0570197-021-AC]

ENVIRONMENTAL PROTECTION COMMISSION
OF HILLSBOROUGH COUNTY

Terry Campbell /for

Richard D. Garrity, Ph.D.
Executive Director