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Sent by Electronic mail – Received Receipt Requested

Ronald A. Nazaro
Terminal Manager
Motiva Enterprises LLC – Port Tampa Terminal
6500 West Commerce Street
Tampa, FL 33616

RE: Project No. 0570197-026-AC
Air Construction Permit
Loading Rack Throughput Increase

Dear Mr. Nazaro:

Based on the permit application received on February 3, 2017, this permit is being issued concurrently with the DRAFT/PROPOSED Title V Revision Permit No. 0570197-027-AV in order to increase the petroleum products throughput at the truck loading rack. This project includes the combined public notice for both permits. The existing facility is located in Hillsborough County at 6500 West Commerce Street, Tampa, Florida, 33616.

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
Motiva Enterprises LLC
Port Tampa Terminal
6500 West Commerce Street
Tampa, FL 33616
Facility ID No. 0570197

PROJECT
Project No. 0570197-026-AC
Application for Minor Source Air Construction Permit
Loading Rack Throughput Increase

COUNTY
Hillsborough County, Florida

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

March 3, 2017

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 Motiva Enterprises LLC – Port Tampa Terminal is a bulk gasoline terminal that handles gasoline, jet fuel, diesel fuel, ethanol, and additives and is categorized under Standard Industrial Classification Code No. 5171 – Petroleum Bulk Stations and Terminals. The Port Tampa Terminal is located in Hillsborough County at 6500 West Commerce Street, Tampa, FL 33616.

The UTM coordinates of the existing facility are Zone 17, 348.0 km East, and 3082.0 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 Revision Permit No. 0570197-027-AV in order to increase the petroleum products throughput at the truck loading rack. This project includes the combined public notice for both permits.

Processing Schedule

February 2, 2017 – Received the permit application.
Not Applicable - Requested additional information.
February 2, 2017 - Application Complete.
March 3, 2017 – Issued Draft Air Construction Permit

2. PROJECT REVIEW

The AC permit is being issued concurrently with the Title V revision permit for a throughput increase in the petroleum products at the truck loading rack (EU 002). The facility requested that the petroleum products be increased from 695,053,000 gal/yr to 766,500,000 gal/yr due to the addition to the 4th loading lane. The VOC PTE emissions from the loading rack (EU 002) will increase from 66.7 TPY to 73.6 TPY.

The facility loads petroleum products into tanker trucks from their petroleum storage tanks via a loading rack. The rack consists of four bays which bottom load the petroleum liquid products into the tanker trucks. Vapors displaced from the trucks during product loading are captured in a vapor recovery system and routed to either the John Zink VRU, the John Zink Company VCU (Model # ZCT-2-8-35-2-316-X) and/or a portable VCU to reduce emissions to the atmosphere. The VRU is the primary control device and the VCU and portable VCU are operated as backup control devices when the VRU is unavailable. A portable VCU is not always located onsite but may be brought onsite as needed. The VRU is also equipped with a continuous emission monitor (CEMS) to monitor VOC emissions from the exhaust of the unit. Assist gas for the VCUs is stored in one 500 gallon and one 1,000 gallon propane tanks.

The facility is a major source of VOC 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 rack (EU 002) is 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)
002 [(1)]	Loading Rack with VRU, VCU, and Portable VCU	VOC	73.6
	Facility-wide	VOC	161.2

[(1)] This modification will result in an increase of the potential VOC emissions of 6.9 TPY, in which all the throughput is assumed to go through the VCU or portable VCU as a conservative estimate with the emission factors of 10 mg/l for the stack and 13 mg/l for fugitive emissions, and the maximum fuel throughput of 766,500,000 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:
Motiva Enterprises LLC
6500 West Commerce Street
Tampa, FL 33616

Air Permit No. 0570197-026-AC
Permit Expires: 9/3/2017
Minor Air Construction Permit

Authorized Representative:
Ronald A. Nazaro, Terminal Manager

Port Tampa Terminal
Loading Rack Throughput Increase

This permit is being issued concurrently with DRAFT/PROPOSED Title V Revision Permit No. 0570197-027-AV in order to increase the petroleum products throughput at the truck loading rack. Permit No. 0570197-027-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.

Ronald A. Nazaro, Motiva Enterprises LLC: ron.nazaro@motivaent.com
Denise Priesmeyer, Motiva Enterprises LLC: denise.priesmeyer@motivaent.com
Mr. Mike Waller, P.E., Ashworth Leininger Group: mwaller@algcorp.com
Ms. Barbara Friday, DEP OPC: barbara.friday@dep.state.fl.us (for posting with U.S. EPA, Region 4)

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)

Facility Description.

The Motiva Tampa Terminal receives petroleum products by marine vessel, but some products are delivered by trucks (e.g. ethanol), totes or drums (e.g. additives). The petroleum liquid products, which include gasoline, ethanol, ethanol-gasoline blends, jet kerosene, diesel and distillate products, and dyes are handled through enclosed piping and are stored in a total of 19 fixed and floating roof storage tanks. Products leave the terminal by tanker truck. Ethanol is received by truck and unloaded to a storage tank through a dedicated truck pump-off area. Two pumps are used to transfer the ethanol from the tank to the loading racks to load into tanker trucks. A 4-stream ethanol blending skid is present on each of the 4 lanes of the loading racks. Ethanol is injected from the skid into the gasoline loading arms at desired percentages, typically up to 10% of the total gas going to the trucks. Volatile organic compound (VOC) emissions from the storage and handling of petroleum products are controlled through the use of internal and external floating roofs, bottom filling of vessels, a Vapor Recovery Unit (VRU), a Thermal Oxidation System/Vapor Combustor Unit (VCU) and a portable VCU.

The facility loads petroleum products into tanker trucks from their petroleum storage tanks via a loading rack. The rack consists of four bays which bottom load the petroleum liquid products into the tanker trucks. Vapors displaced from the trucks during product loading are captured in a vapor recovery system and routed to either the John Zink VRU, the John Zink Company VCU (Model # ZCT-2-8-35-2-316-X) and/or a portable VCU to reduce emissions to the atmosphere. The VRU is the primary control device and the VCU and portable VCU are operated as backup control devices when the VRU is unavailable. A portable VCU is not always located onsite but may be brought onsite as needed. The VRU is also equipped with a continuous emission monitor (CEMS) to monitor VOC emissions from the exhaust of the unit. Assist gas for the VCUs is stored in one 500 gallon and one 1,000 gallon propane tanks.

A heat exchanger system uses water to cool the gasoline vapors going into the VRU. Water is pumped through the mechanical chiller, which cools the water to approximately 72 °F. The cooled water is then circulated to a heat exchanger on the VRU vapor inlet line prior to the vapors entering the VRU. The heat exchanger cools the gasoline vapors to a temperature that provides gasoline vapors with a true vapor pressure of 9 psia or less to the VRU. The cooling water from the heat exchanger is then circulated to a surge tank to maintain the minimum loop volume required by the chiller system. This system optimizes the operation of the VRU, resulting in the VRU being able to operate for a longer period of time before having to shut down.

Some of the tanks at this facility have been grouped to provide flexibility in operation. The emissions from each tank group are based on the standing and working losses from each tank in the group using the product with the highest annual average vapor pressure in that tank group. This allows storage and handling of multiple products in the same tank group as long as they don't exceed the vapor pressure of the worse-case product.

Summary of Emissions Unit (affected under this Permit).

EU No.	Brief Description
Regulated Emissions Units	
002	Loading Rack with Vapor Recovery Unit (VRU), Vapor Combustion Unit (VCU), and Portable VCU

SECTION 2. FACILITY-WIDE CONDITIONS

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

FW1. 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).

FW2. **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)]

FW3. General 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) 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.

FW4. General Visible Emissions. No person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity equal to or greater than 20% opacity. This regulation does not impose a specific testing requirement. [Rule 62-296.320(4)(b), F.A.C.]

FW5. 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. 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 (DEP) 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, Post Office 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)]

{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.}

{Permitting Note: The Title V Annual Emissions Fee form (DEP Form No. 62-213.900(1)) has been repealed. A separate Annual Emissions Fee form is no longer required to be submitted by March 1st each year.}

FW7. As requested by the permittee, in order to limit the potential to emit for 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.

FW8. 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.]

FW9. 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 a Department rule 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 Department 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 Department in accordance with the provisions of subsection 62-297.310(10), F.A.C. [Rules 62-297.310(8)(c) and 62-4.070(3), F.A.C.]

FW10. 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.]

FW11. 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.

FW12. 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.]

The specific conditions in this section apply to the following emissions unit:

EU No.	Brief Description
002	Loading Rack with Vapor Recovery Unit (VRU), Vapor Combustion Unit (VCU), and Portable VCU

A.1. Permitted Capacity. The maximum annual throughput of petroleum products shall not exceed 766,500,000 gallons per any twelve consecutive month period. [Rules 62-4.160(2) and 62-210.200(PTE), F.A.C., Permit No. 0570197-014-AC and Application No. 0570197-026-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. 0570197-014/019/021/022-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]

A.4. The maximum allowable VOC emissions from the loading rack, controlled by the VRU, VCU, and portable VCU 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 73.6 tons per any twelve consecutive month period. [Rule 62-4.070(3), F.A.C., Permit No. 0570197-009-AC and Application No. 0570197-026-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)]
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 Nos. 0570197-021/022-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. FW16, 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 Nos. 0570197-021/022-AC]

A) Test the VRU and liquid loading equipment for VOC emissions annually once per calendar year (January 1 – December 31).
B) 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).
C) Test the VCU each calendar year that it operates five hundred (500) hours or more. The test shall be performed within 90 days after 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 after reaching the five hundred (500) hours of operation. [Rule 62-4.070(3) and 62-210.200(PTE), F.A.C. and Permit No. 0570197-022-AC]

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 this Title V permit revision. 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. 0570197-021/022-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.]

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. 0570197-009/014/021/022-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)