Department of
Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

TO: Jonathan Holtom DATE: 6 Apr 04

DEPT: DARM FAX#: 850 922 6979

Number of Pages: 5 (including cover page)

FROM: Alan Zahm

PROGRAM: AIR RESOURCES MGMT SECTION Permitting

TELEPHONE # 407-893-3333, 3334
SC 325-3333, 3334

FAX #: 407-897-5963
SC 342-5963

COMMENTS:

Copy of Coastal Fuels CAM Plan response

30 day review end 28 April

Garrett Clemmons - (303) 626-8209

Coastal Fuels Marketing, Inc.
A SUBSIDIARY OF TRANSMONTAIGNE

March 26, 2004

Mr. Alan Zahm
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803

Re: CAM Plan for Title V Renewal
Cape Canaveral Terminal (Permit No. 0090029-003-AV)
Coastal Fuels Marketing Inc.

Dear Mr. Zahm,

Coastal Fuels Marketing Inc. (CFMI) owns and operates the Cape Canaveral Terminal, located in Cape Canaveral, Florida. The Title V permit, which this facility operates under, is currently being renewed. Please find attached the Compliance Assurance Monitoring (CAM) Plan for the Cape Canaveral Title V.

If you have any questions, or need further information, please call me at (303) 626-8209.

Sincerely,

COASTAL FUELS MARKETING INC.

Garrett Clemons
Environmental Analyst
Regulatory Compliance

	Indicator No. 1
I. Indicator	Presence of Flame
Monitoring Approach	Flame presence is monitored using a thermocouple.
II. Indicator Range	An excursion is defined when the thermocouple indicates that the flame is absent or below 300 degrees Fahrenheit during loading.
III. Performance Criteria	
A. Data Representativeness	The thermocouple is wired into the flare to detect the presence of the flame.
B. Verification of Operational Status	Loading occurs when the system is operational.
C. QA/QC Practices and Criteria	A validation check is conducted at least once each week.
D. Monitoring Frequency	The thermocouple operates continuously, when the VCU is operating
E. Data Collection Procedures	If the thermocouple detects a low pilot light temperature, loading cannot occur, which in turn will notify terminal personnel of a problem.
F. Averaging Period	NA
IV. Flare Bypass Monitoring	If the thermocouple notifies that the flame is absent during loading, an automatic shutoff occurs at the loading rack, making loading impossible.

	Indicator No. 2
I. Indicator	Magnahelic Gauges readings.
Monitoring Approach	Magnahelic Gauges are used to verify that all vapor from loading operations are directed to the VCU (i.e no bypass of the collection system).
II. Indicator Range	An excursion is defined when the reading on the gauges is below 1.0 inches of water column during loading. Or when the reading of the gauge reaches 17.7 inches of water. If the pressure reaches 17.0 inches of water the loading rack immediately shuts down. The 17.0 inches of water reading serves as an early detection, keeping the pressure relief valve closed.
III. Performance Criteria	
A. Data Representativeness	The Magnahelic gauge is connected to the gas flow line.
B. Verification of Operational Status	The Magnahelic gauge is calibrated yearly, and the operation of this gauge is conducted in accordance with the manufacturer's recommendation.

C. QA/QC Practices and Criteria	Accuracy verification is done by reading the gauge, with a known pressure. This validation check would be conducted at least once each fiscal year. .
D. Monitoring Frequency	It is checked daily and recorded weekly.
E. Data Collection Procedures	Terminal personnel manually record excursions.
F. Averaging Period	NA
IV. Collection System Bypass Monitoring	A bypass cannot occur.

The Coastal Fuels Marketing Inc. (CFMI) Cape Canaveral terminal is a petroleum bulk storage facility located in Cape Canaveral, Florida. The facility currently stores gasoline, asphalt, 6 oil, and distillate products. The facility operates 52 weeks a year, 7 days a week, 8,760 hours per year. A Zeeco VCU rated at 35 mg/L controls emissions from the loading of gasoline.

Flame presence is monitored using a thermocouple. After a tanker truck is hooked up at the loading rack, a remote signal is sent to the VCU programmable logic controller (PLC) to automatically ignite the pilot flame. A trial for ignition period is started and continues until the thermocouple is proven. During this time the pilot gas solenoid and flame front generator solenoid are held open. When the pilot has proven, a permission to load signal is given to the load rack resulting in a permissive position. The RCM electro hydraulic fail-safe actuator receives the same permission to load signal and opens up a hydraulic valve that allows the vapors to proceed to the igniter.

CFMI has chosen to use a temperature range for the pilot light as the indicator that the VCU is running properly. Loading can not occur unless the pilot light on the VCU is at 300 F. CFMI has enclosed the latest testing information on the VCU, conducted on August 26, 2003. During this test the VCU was in normal operation, with the pilot light being at least 300 F. The VCU was rated at 9.01 mg/L, well under the permit limitation of 35 mg/L.

Each loading rack vapor recovery line has a maximum allowable vapor pressure of 17.7 inches of water. The maximum pressure observed during the last test was 3.5 inches of water. If the pressure should happen to reach 17.7 inches of water there is a pressure relief valve. However, the pressure will not reach 17.7 inches of water. If the pressure reaches 17.0 inches of water the loading rack immediately shuts down. Since the pressure relief valves are set to open at 17.7 inches of water, 17.0 inches of water serves as an early warning, therefore the pressure relief valve will not open. Terminal personnel manually monitor the pressure relief valves. A magnahelic gauge is also in place to measure the pressure. An automatic shut down is also associated with the magnahelic gauge.

If the pressure exceeds 17.0 inches of water the loading operations are automatically shutdown until the problem is corrected.

As mentioned above if the pilot light on the VCU goes below 300 degrees Fahrenheit the unit will automatically shut down. If the magnahelic gauge reads a pressure of 17.0 inches of water, loading is automatically shut down. Loading cannot occur at this facility unless the VCU is running properly. CFMI maintains written documentation of malfunctions that occur to the VCU, and corrective action.

Manufactures routine maintenance requirements include keeping the flame detection system adjusted for the smoothest, most reliable operation, and ensuring that the flame signal current is above the manufacturers minimum acceptable level.

Records relevant to the above requirements which are specified by the current Title V permit are maintained on site. Terminal personnel keep monthly records of the operational status of the VCU. This operational status includes: malfunctions, corrective actions, calibration reports, excursions, and maintenance.

Sent orig to A Linn on 2/6/04

Coastal Fuels Marketing, Inc.
A SUBSIDIARY OF TRANSMONTAIGNE

RECEIVED
JAN 30 2004
BUREAU OF AIR REGULATION

January 28, 2004

Mr. Jonathan Holtom
Northwest District Branch Office
2815 Remington Green Circle
Suite A
Tallahassee, Florida 32308-1513

Re: CAM Plan
Title V Permit Renewal
Cape Canaveral Terminal
Coastal Fuels Marketing Inc.

Dear Mr. Holtom,

On January 7, 2004, Coastal Fuels Marketing Inc. (CFMI) received your letter requesting additional information for the CFMI Cape Canaveral CAM Plan. Please find attached the requested information to complete the CAM Plan.

If you have any questions, or need any further information, please call me at (303) 626-8209.

Sincerely,

COASTAL FUELS MARKETING INC.

Garrett Clemons

Garrett Clemons
Environmental Analyst
Regulatory Compliance

JAN 29 2004
DEP TALLAHASSEE
BRANCH OFFICE

JAN 29 2004
DEP TALLAHASSEE
BRANCH OFFICE

Monitoring Approach Justification

I. Background and Applicability

The Coastal Fuels Marketing Inc. (CFMI) Cape Canaveral terminal is a petroleum bulk storage facility located in Cape Canaveral, Florida. The facility currently stores gasoline, asphalt, 6 oil, and distillate products. The facility operates 52 weeks a year, 7 days a week, 8,760 hours per year. A Zeeco VCU rated at 35 mg/L controls emissions from the loading of gasoline.

II. Monitoring Approach

Flame presence is monitored using a thermocouple. After a tanker truck is hooked up at the loading rack, a remote signal is sent to the VCU programmable logic controller (PLC) to automatically ignite the pilot flame. A trial for ignition period is started and continues for 5 minutes or until the thermocouple is proven. During this time the pilot gas solenoid and flame front generator solenoid are held open. When the pilot has proven, a permission to load signal is given to the load rack resulting in a permissive position. The RCM electro hydraulic fail-safe actuator receives the same permission to load signal and opens up a hydraulic valve that allows the vapors to proceed to the igniter.

Rationale for Monitoring

CFMI has chosen to use a temperature range as the indicator that the VCU is running properly. Loading can not occur unless the pilot light on the VCU is at 300 F. CFMI has enclosed the latest testing information on the VCU, conducted on August 26, 2003. During this test the VCU was in normal operation, with the pilot light being at least 300 F. The VCU was rated at 9.01 mg/L, well under the permit limitation of 35 mg/L.

Each loading rack vapor recovery line has a maximum allowable vapor pressure of 17.7 inches of water. The maximum pressure observed during the last test was 3.5 inches of water. If the pressure should happen to reach 17.7 inches of water there is a pressure relief valve. However, the pressure will not reach 17.7 inches of water. If the pressure reaches 17.0 inches of water the loading rack immediately shuts down. Since the pressure relief valves are set to open at 17.7 inches of water, 17.0 inches of water serves as an early warning, therefore the pressure relief valve will not open. Terminal personnel manually monitor the pressure relief valves. A magnahelic gauge is also in place to measure the pressure. An automatic shut down is also associated with the magnahelic gauge. If the pressure exceeds 17.0 inches of water the loading operations are automatically shutdown until the problem is corrected.

Indicator Range

As mentioned above if the pilot light on the VCU goes below 300 degrees Fahrenheit the unit will automatically shut down. If the magnahelic gauge reads a pressure of 17.0 inches of water, loading is automatically shut down. Loading cannot occur at this facility unless the VCU is running properly. CFMI maintains written documentation of malfunctions that occur to the VCU, and corrective action.

Monitoring Frequency

The thermocouple operates continuously, when the VCU is operating.

QA/QC Procedures

Manufactures routine maintenance requirements include keeping the flame detection system adjusted for the smoothest, most reliable operation, and ensuring that the flame signal current is above the manufacturers minimum acceptable level.

III. Record Keeping

Records relevant to the above requirements which are specified by the current Title V permit are maintained on site. Terminal personnel keep monthly records of the operational status of the VCU. This operational status includes: malfunctions, corrective actions, calibration reports, excursions, and maintenance.

IV. Periodic Reporting

Periodic reporting includes the following: date, time, duration of excursions, and corrective action.

Coastal Fuels Marketing, Inc.
A SUBSIDIARY OF TRANSMONTAIGNE

December 11, 2003

DEC 12 2003
DEP TALLAHASSEE
BRANCH OFFICE

Mr. Jonathan Holtom
Florida DEP
Northwest District Office
2815 Remington Green Circle
Suite A
Tallahassee, Florida 32308-1513

Re: Requested Information for CAM
Cape Canaveral Terminal (Project No. 0090029-006-AV)
Coastal Fuels Marketing Inc.

Dear Mr. Holtom,

Coastal Fuels marketing Inc. (CFMI) owns and operates the Cape Canaveral terminal, located in Cape Canaveral, Florida. CFMI is currently renewing the Title V permit for this facility. On November 25, 2003, CFMI received a memorandum requesting more information to complete the Compliance Assurance Monitoring (CAM) Plan.

Please find attached the requested information. If you have any questions, or need further information, please call me at (303) 626-8209.

Sincerely,

COASTAL FUELS MARKETING INC.

Garrett Clemons
Environmental Analyst
Regulatory Compliance

cc: Mr. Alan Zahm, Florida DEP Central District

Monitoring Approach Justification

I. Background

The Coastal Fuels Marketing Inc. (CFMI) Cape Canaveral terminal is a petroleum bulk storage facility located in Cape Canaveral, Florida. The facility currently stores gasoline, asphalt, 6 Oil, and distillate products. The facility operates 52 weeks a year, 7 days a week, 8,760 hours per year.

II. Rationale for Selection of Performance Indicators

CFMI has chosen to use a temperature range as the indicator that the VCU is running properly. The VCU will automatically shut down if the operating temperature goes below 750 degrees Fahrenheit. CFMI has enclosed the latest testing information on the VCU, conducted on August 26, 2003.

Each loading rack vapor recovery line has a maximum allowable vapor pressure of 17.7 inches of water. The maximum pressure observed during the last test was 3.5 inches of water. If the pressure should happen to exceed 17.7 inches of water there is a pressure relief valve. Terminal personnel manually monitor the pressure relief valves. A magnahelic gauge is also in place to measure the pressure. An automatic shut down is also associated with the magnahelic gauge. If the pressure exceeds 17.7 inches of water the loading operations are automatically shutdown until the problem is corrected.

III. Rationale for Selection of Indicator Ranges

As mentioned above if the operating temperature of the VCU goes below 750 degrees Fahrenheit the unit will automatically shut down. If the magnahelic gauge reads a pressure greater than 17.7 inches of water, loading is automatically shut down. Loading cannot occur at this facility unless the VCU is running properly. CFMI maintains written documentation of malfunctions that occur to the VCU, and corrective action.

EMISSIONS TESTING
of the
COASTAL FUELS MARKETING. INC.
PORT CANAVERAL TERMINAL
VAPOR COMBUSTION UNIT
Port Canaveral, FL

August 26, 2003

FDEP Permit No. 0090029-003-AV
SES Reference No. 03S301

Conducted by:

SOUTHERN ENVIRONMENTAL SCIENCES, INC.
1204 North Wheeler Street
Plant City, Florida 33563
Phone (813) 752-5014 Fax (813) 752-2475

Project Participants

Kenneth M. Roberts
Mark S. Gierke
Terry L. Wilson
Dale A. Wingler

EMISSIONS TESTING

EMISSIONS TESTING
of the
COASTAL FUELS MARKETING. INC.
PORT CANAVERAL TERMINAL
VAPOR COMBUSTION UNIT

Port Canaveral, FL

August 26, 2003

TABLE OF CONTENTS

1.0 INTRODUCTION

Southern Environmental Sciences, Inc. conducted a flare emissions test and visible emissions evaluation of the Coastal Fuels Marketing, Inc., Port Canaveral Terminal, Vapor Combustion Unit on August 26, 2003. This facility is located at Port Canaveral, Florida. Testing was performed to determine if the plant was operating in compliance with requirements of the Florida Department of Environmental Protection (FDEP). Mr. Thomas Mulligan of the FDEP was present as an observer during a portion of the test.

2.0 SUMMARY OF RESULTS

The flare was found to be in compliance with applicable emission limiting standards. Results of the test are summarized in Table 1. Emissions from the vapor collection system due to the loading of liquid product into gasoline tank trucks is limited to 35 milligrams of volatile organic compounds per liter of gasoline loaded. The emission rate during the test was 9.01 milligrams of volatile organic compounds per liter of gasoline loaded, within the allowable limit. The maximum allowable vapor system pressure, measured at each loading rack vapor recovery line is 17.7 inches of water. The maximum pressure observed during the test was 3.5 inches of water. A visual determination of fugitive emissions was performed over a two hour period. The accumulated emission time was zero minutes, well within the maximum limit of 5 minutes during any 2 consecutive hours.

TABLE 1. EMISSIONS TEST SUMMARY

Company: COASTAL FUELS - PORT CANAVERAL
Source: VAPOR COMBUSTION UNIT

Date of Test	08/26/2003
Start Time (24-hr. clock)	0635
End Time (24-hr. clock)	1235
Inlet Gas Volume (SCM)	705
Outlet Gas Volume (SCM)	76,040
Average Barometric Pressure (in. Hg.)	30.06
Average Static Pressure (in. H2O)	0.7
Average Meter Temperature (`F)	90
Gas Meter Correction Factor	1
Total Loading Positions	3
Total Trucks Checked	13
Trucks With Leaks	0
Trucks With No Leaks	13
Total Gasoline Dispensed (gallons)	101,680
Gasoline excluded Due to Leaks (gallons)	0
Total Countable Gasoline Dispensed (gallons)	101,680
Total Countable Gasoline Dispensed (liters)	384,859

Average VOC Inlet Concentration, (ppm, as propane)	256,014
Total mass of Inlet Hydrocarbons, (milligrams as carbon)	364,003,677
Average VOC Outlet Concentration, (ppm, as propane)	21.5
Average CO Outlet Concentration, (ppm)	63.0
Average CO2 Outlet Concentration, (%)	0.8
Total mass of Outlet Hydrocarbons, (milligrams as carbon)	3,469,155
Average Efficiency, (%)	98.5
Emission rate (mg/l)	**9.01**
Allowable Emission rate (mg/l)	**35**

3.0 PROCESS DESCRIPTION

The Coastal Fuels Marketing, Inc., Port Canaveral Terminal truck loading facility controlled by this vapor combustion unit includes one loading rack. Trucks are bottom filled to reduce the amount of vapors generated. The displaced vapors are routed through an air assisted flare. The amount of product loaded during the testing period was monitored by Coastal Fuels personnel and is included in Table 1.

4.0 TESTING PROCEDURES

4.1 Methods

Flare testing and analyses were conducted in accordance with procedures described in 40 CFR 60.503 and 60.18. Volumetric flowrate at the inlet and outlet were determined in accordance with EPA Method 2B - Determination of Exhaust Gas Volume Flow Rate from Gasoline Vapor Incinerators, 40 CFR 60, Appendix A-1. Hydrocarbon concentrations were measured at the inlet and outlet in accordance with EPA Method 25A - Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer, 40 CFR 60, Appendix A-7. Carbon monoxide concentration was measured at the outlet in accordance with EPA Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources, 40 CFR 60, Appendix A-4. Carbon dioxide was also measured at the outlet using procedures generally described in Method 10 by substituting carbon dioxide gas where the method called for carbon monoxide and omitting the silica gel and carbon dioxide absorbent tubes. The inlet total hydrocarbon analyzer, the carbon monoxide and the

carbon dioxide analyzers were calibrated with an Environics Model 2020 gas dilution system and calibration gases using procedures described in EPA Method 205 - Verification of Gas Dilution Systems for Field Instrument Calibrations, 40 CFR 51, Appendix M. Trucks were checked for leaks using procedures described in EPA Method 21 - Determination of Volatile Organic Compound Emission Leaks, 40 CFR 60, Appendix A-7. The visual determination of fugitive emissions was performed in accordance with EPA Method 22 - Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares, 40 CFR 60, Appendix A-7.

4.2 Pretest Preparation

Prior to testing, an eight inch American Meter Company turbine meter was connected in line to measure the total volume of vapor reaching the flare. The vapor flare, terminal vapor recovery lines and testing ductwork were checked for leaks with a combustible gas detector. Any leaks detected were repaired prior to testing. Magnehelic gauges were connected at each loading rack to measure the vapor collection system pressure. Two Gastech Model GT 105 combustible gas detectors were calibrated prior to the test with zero air and 2.5 percent methane calibration gas. Each analyzer was calibrated in accordance with the applicable test method immediately prior to the test.

4.3 Sampling Trains

The inlet Method 25A sampling train consisted of a dilution probe (100:1), a teflon

sample line, heated as necessary to prevent condensation, a California Analytical Model 300HFID(M) heated total hydrocarbon analyzer and a strip chart recorder. The Outlet Method 25A sampling train consisted of a heated stainless steel probe, heated teflon sample line, a California Analytical Model 300HFID(M) heated total hydrocarbon analyzer and a strip chart recorder. A schematic of the hydrocarbon sampling train is shown in Figure 1. The carbon monoxide sampling train consisted of a heated stainless steel probe, condenser, silica gel tube, carbon dioxide absorption tube, teflon sample line, and a Thermo Environmental Instruments, Inc. Model 48 Gas Filter Correlation CO analyzer. A schematic of the carbon monoxide sampling train is shown in Figure 2. The carbon dioxide sampling train consisted of a heated stainless steel sampling probe, condenser, teflon sample line and a California Analytical Model 100 carbon dioxide analyzer.

4.4 Data Collection

Inlet volume, temperature and static pressure measurements were recorded at the inlet to the meter at five minute intervals for the duration of the test to determine volume at standard conditions. Inlet and outlet hydrocarbon concentrations and outlet carbon monoxide and carbon dioxide concentrations were measured continuously throughout the six hour test period. During the testing each applicable tank truck was tested for leaks at all domes and boots. The probe of the gas meter

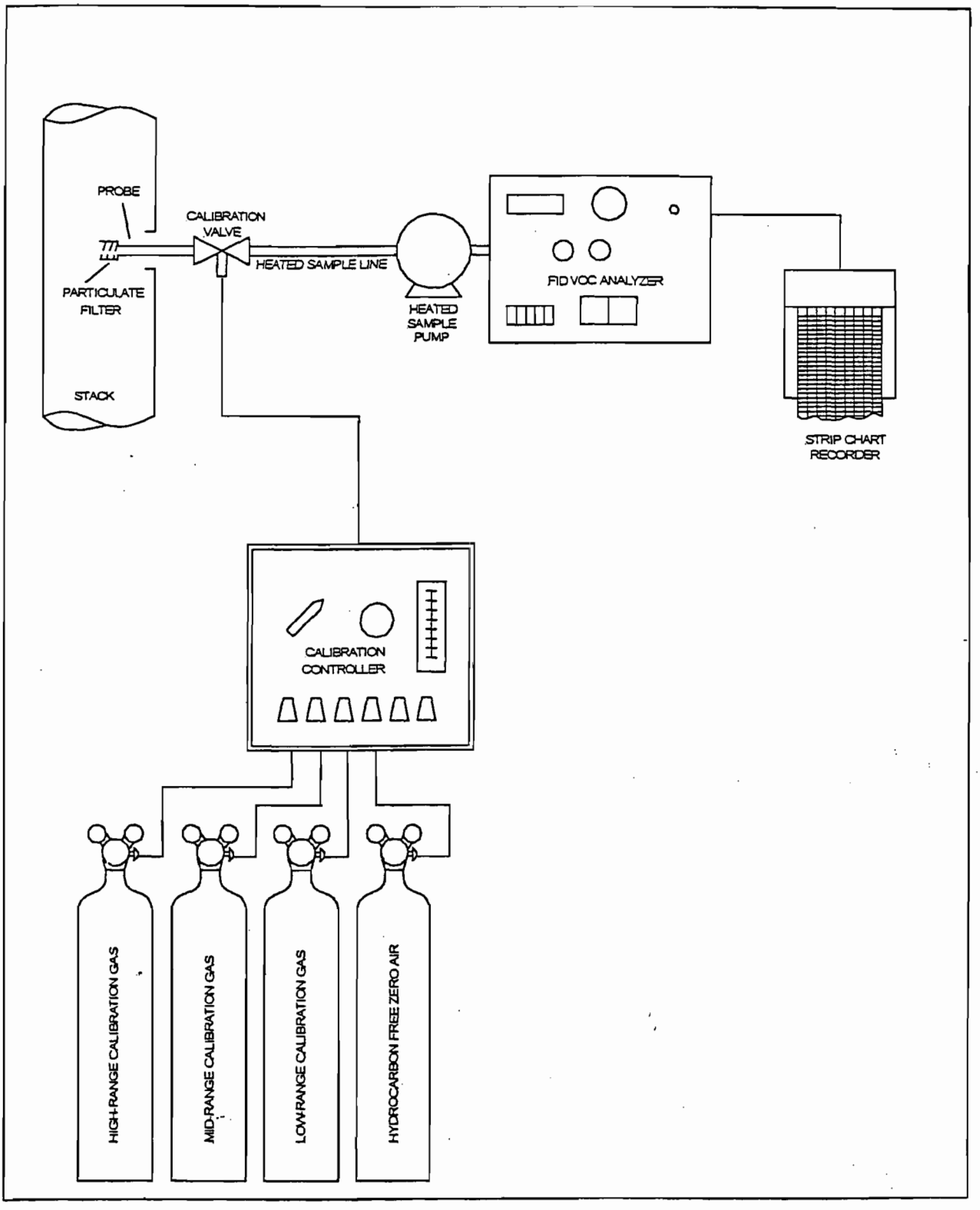


Figure 1. EPA Method 25A Sampling Train

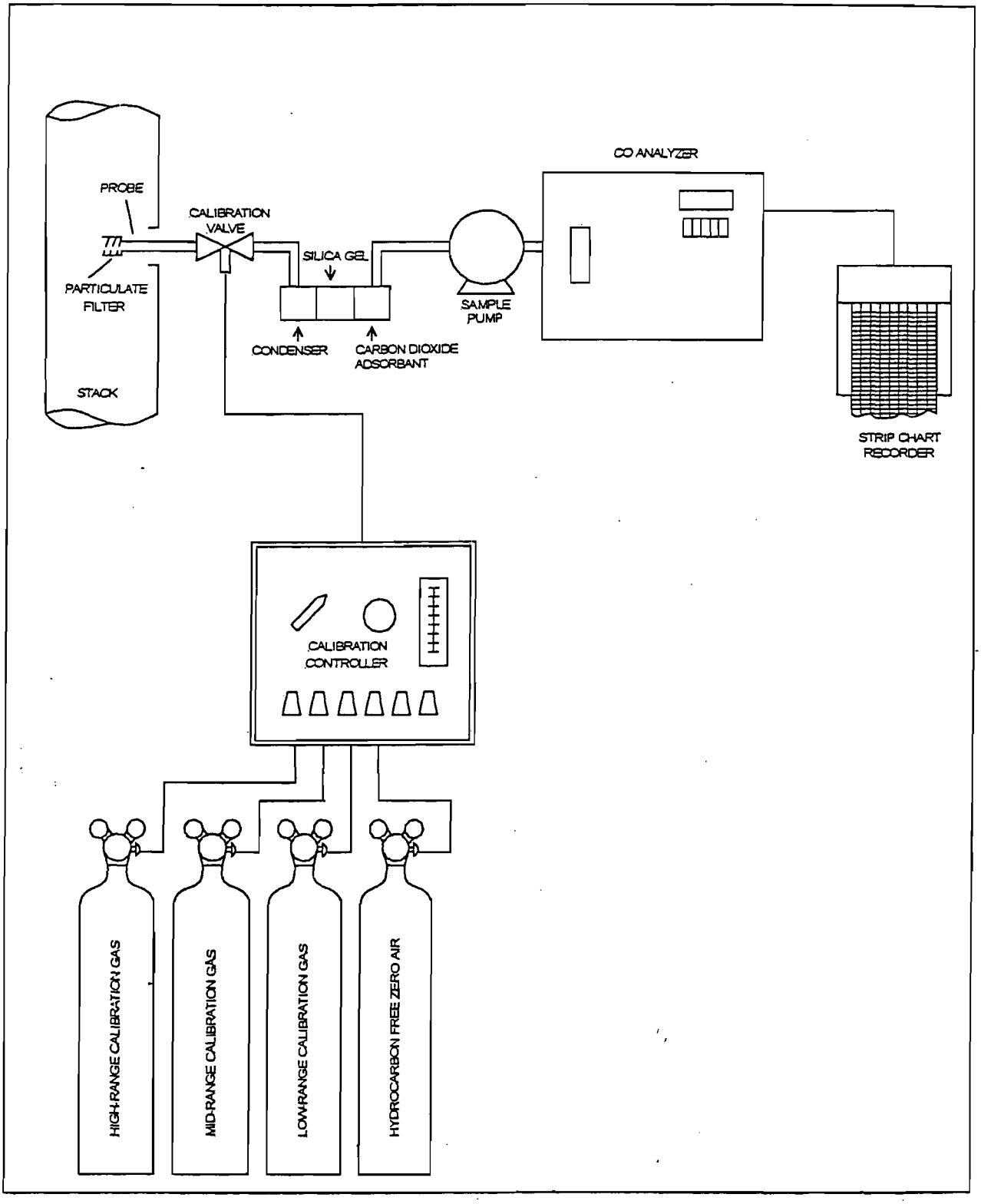


Figure 2. EPA Method 10 Sampling Train.

was held 2.5 centimeters from the potential leak source and probe movement was maintained at 2 centimeters per second. If an increase in concentration was noted at a possible leak, the probe was moved to locate the point of highest meter response. Leaks greater than or equal to 10,000 parts per million (as methane) were documented on field data sheets.

5.0 ANALYTICAL PROCEDURE

5.1 Analysis

Within 2 hours of the start of the test zero and high-level propane calibration gases were introduced into the hydrocarbon analyzers at the calibration valve assembly and the output was adjusted to the appropriate level if necessary. A linear regression was then conducted to calculate the predicted response for the low-level and mid-level gases. The low-level and mid-level gases were then introduced into the measurement system. The difference between the predicted and actual responses were calculated. A difference of less than 5 percent was considered acceptable. To assess the response time of the measurement system, zero gas was introduced into the system. After the output was stabilized, the high-level gas was quickly introduced. The time from the concentration change to the measurement system response equivalent to 95 percent of the step change was determined. The test was repeated three times. Results were recorded on the appropriate strip charts and are included in the appendix. Instrument calibrations were checked periodically during the test by introducing mid-range and zero gases into the instrument through the sampling train. The carbon

monoxide and carbon dioxide analyzers were calibrated immediately before the beginning of the test and checked periodically by introducing mid-range and zero gases into the instruments through the sampling trains.

5.2 Data Reduction

The outlet volume was determined in accordance with equations in EPA Method 2B. Hydrocarbon emissions were determined from the outlet hydrocarbon concentrations and the calculated outlet flowrate. The total countable gasoline loaded during the test was calculated by summing the total gasoline loaded then subtracting the total loaded into trucks on which leaks were encountered.

APPENDIX

Project Participants

Certification

Visual Determination of Fugitive Emissions

Laboratory Data

Field Data Sheets

Calculations and Equations

Strip Charts

Calibration Data

PROJECT PARTICIPANTS AND CERTIFICATION

COASTAL FUELS MARKETING. INC.
CAPE CANAVERAL TERMINAL
VAPOR COMBUSTION UNIT

Port Canaveral, FL

August 26, 2003

Project Participants:

Kenneth M. Roberts Mark. S. Gierke Terry L. Wilson Dale A. Wingler	Conducted the field testing.
Dale A. Wingler	Performed the visual determination of fugitive emissions.
Kenneth M. Roberts	Computed test results.
Kenneth M. Roberts	Prepared the final test report.

Certification:

I certify that to my knowledge all data submitted in this report is true and correct.

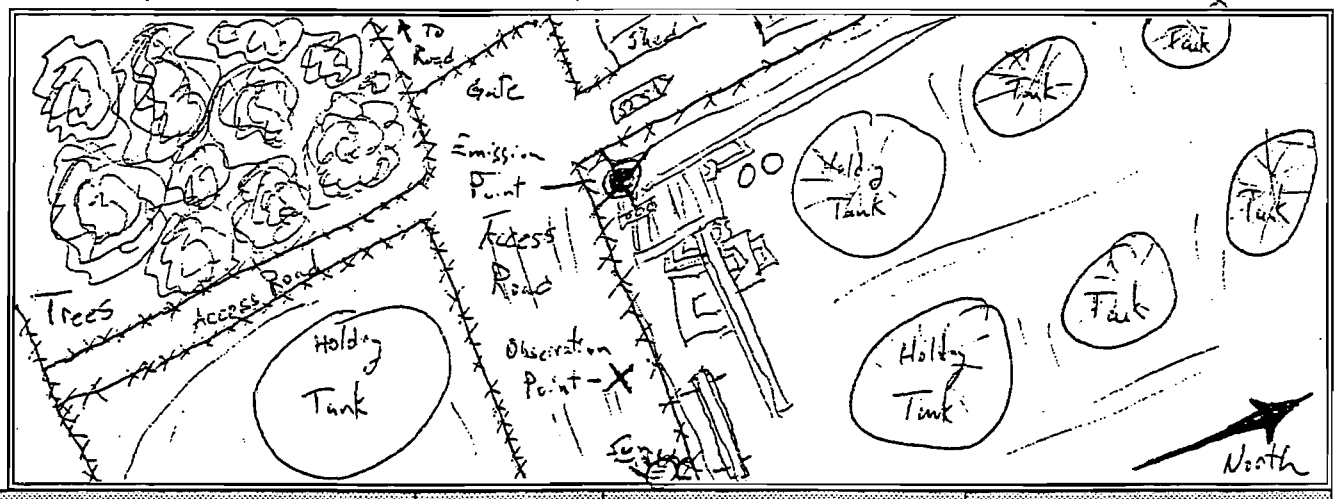
Kenneth M. Roberts, QEP

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

EPA METHOD 22
FUGITIVE OR SMOKE EMISSION INSPECTION
OUTDOOR LOCATION

COMPANY	Coastal Fuels	DATE	8/26/03
UNIT	Port Canaveral	SKY CONDITIONS	Scattered
PERMIT NO.	0090029-003-AV	PRECIPITATION	None
OBSERVER	Dale A. Digler	WIND DIRECTION	Variable
AFFILIATION	SES	WIND SPEED	0-3
INDUSTRY	Gasoline Terminal	PROCESS UNIT	Shrouded Flare

Sketch process unit: indicate observer position relative to source and sun: indicate potential emission points and/or actual emission points.



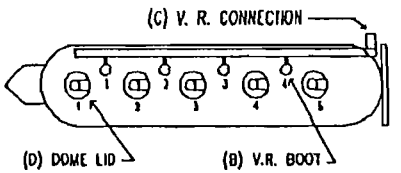
OBSERVATIONS	CLOCK TIME	OBSERVATION PERIOD DURATION (MIN:SEC)	ACCUMULATED EMISSION TIME* (MIN:SEC)
BEGIN OBSERVATION	0718-0738	20:00	00:00
	0743-0803	20:00	00:00
	0808-0828	20:00	00:00
	0833-0853	20:00	00:00
	0858-0918	20:00	00:00
	0923-0943	20:00	00:00
END OBSERVATION			

* Last reading indicates total duration of observed emissions for the test.

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

1204 N. WHEELER STREET ☐ PLANT CITY, FLORIDA ☐ 33566
(813) 752-5014 ☐ FAX (813) 752-2475

(1)



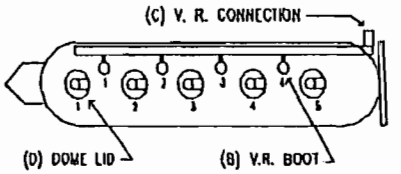
LEAK LOCATION DIAGRAM

TRUCK LEAK CHECKS			
COMPANY	Coastal Fuels	DATE	8/26/03
LOCATION	Port Canaveral	OPERATOR(S)	DW / TW
FACILITY	Flare	INSTRUMENT(S)	GT105

OWNER	TRUCK NO.	TIME	RACK NO.	LANE NO.	V.R.BACK PRESSURE (IN. H2O)		GALLONS LOADED	PRODUCT THIS LOAD	PRODUCT PREV LOAD	NO LEAK	LEAK	LEAK LOCATION
Florida Rock	9772	0627	/	1	1.0	1	7500	Diesel				
						2						
						3						
						4						
						TOTAL						
FleetWing	141	0628	/	2	2.0	1	3800	Diesel				
						2						
						3						
						4						
						TOTAL						
FleetWing	143	0631	/	3	1.5	1	4160	Diesel				
						2						
						3						
						4						
						TOTAL						
RC Dunn Mobil	15	0651	/	2	1.5	1	5000	Diesel				
						2						
						3						
						4						
						TOTAL						
Penn Tank Lines, Inc.	9587	0708	/	1	1.5	1	7800	Diesel				
						2						
						3						
						4						
						TOTAL						

(2)

SOUTHERN ENVIRONMENTAL SCIENCES, INC.
1204 N. WHEELER STREET ☐ PLANT CITY, FLORIDA ☐ 33566
(813) 752-5014 ☐ FAX (813) 752-2475



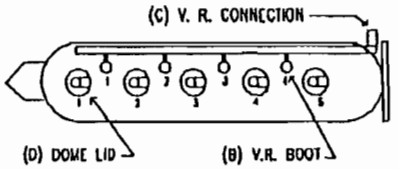
LEAK LOCATION DIAGRAM

TRUCK LEAK CHECKS			
COMPANY	Coastal Fuels	DATE	4/24/03
LOCATION	Port Canaveral	OPERATOR(S)	DW/TW
FACILITY	Flape	INSTRUMENT(S)	GT105

OWNER	TRUCK NO.	TIME	RACK NO.	LANE NO.	V.R.BACK PRESSURE (IN. H2O)		GALLONS LOADED	PRODUCT THIS LOAD	PRODUCT PREV LOAD	NO LEAK	LEAK	LEAK LOCATION
Kinan	1303	0725	/	2	3.5	1	3100	87	Gas	✓		
						2	2900	93	1	1		
						3	2800	Dies.	1			
						4						
						TOTAL	~~8800~~ 5500 Gas					
RC Dunn	15	0747 ✓	/	2	1.5	1	4682	Diesel	Dies			
						2						
						3						
						4						
						TOTAL						
Petro chemical	6129	0800	/	3	2.5	1	8000	87	Gas	✓		
						2	1000	93	1	1		
						3						
						4						
						TOTAL	9000					
Fla Rock	RN 9935	0800	/	1	2.5	1	7000	87	Dies	✓		
						2	2000	Dies		1		
						3						
						4						
						TOTAL	7000					
PCT	8443	0807	/	2	3.5	1						
						2	5000	87	Gas			
						3	4000	87	1			
						4						
						TOTAL	9000					

(3)

SOUTHERN ENVIRONMENTAL SCIENCES, INC.
1204 N. WHEELER STREET ☐ PLANT CITY, FLORIDA ☐ 33566
(813) 752-5014 ☐ FAX (813) 752-2475



LEAK LOCATION DIAGRAM

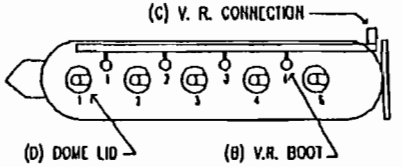
TRUCK LEAK CHECKS			
COMPANY	Coastal Fuels	DATE	8/26/03
LOCATION	Port Canaveral	OPERATOR(S)	MG / TW
FACILITY	Flare	INSTRUMENT(S)	GT 105

OWNER	TRUCK NO.	TIME	RACK NO.	LANE NO.	V.R BACK PRESSURE (IN. H2O)		GALLONS LOADED	PRODUCT THIS LOAD	PRODUCT PREV LOAD	NO LEAK	LEAK	LEAK LOCATION
Petro Chem.	763994	0818	/	1	2.0	1	5000	87	Gas	✓		
						2	3000	87	1	1		
						3						
						4						
						TOTAL	8000					
Florida Rock & Tank Lines	9772	~~0830~~ 0853	/	~~2~~ 2	2.5	1	8000	Rev	Diesel	✓		
						2	1000	93	1	1		
						3						
						4	9000					
						TOTAL						
PCT	6116	0904	/	3	2.0	1	7000	87	Gas	✓		
						2	1000	93				
						3	1000	89	1	1		
						4						
						TOTAL	9000					
Fla Rock Tank Lines	3370	0925	/	2	2.0	1	8000	89	Gas	✓		
						2	1000	93		1		
						3						
						4						
						TOTAL	9000					
Glover Oil Co.	—	0944	/	3	2.0	1						
						2	3.5	89	Gas			
						3	1500	87	Dies			
						4						
						TOTAL						

TRKLEAK.FRM

SOUTHERN ENVIRONMENTAL SCIENCES, INC.
1204 N. WHEELER STREET ☐ PLANT CITY, FLORIDA ☐ 33566
(813) 752-5014 ☐ FAX (813) 752-2475

(4.)



LEAK LOCATION DIAGRAM

TRUCK LEAK CHECKS			
COMPANY		DATE	
LOCATION		OPERATOR(S)	
FACILITY		INSTRUMENT(S)	

OWNER	TRUCK NO.	TIME	RACK NO.	LANE NO.	V.R.BACK PRESSURE (IN. H2O)		GALLONS LOADED	PRODUCT THIS LOAD	PRODUCT PREV LOAD	NO LEAK	LEAK	LEAK LOCATION
Watkins Oil Co.	2	0950	/	1	2.0	1	4200	Diesel				
						2						
						3						
						4						
						TOTAL						
Petro-Chemical Transport, Inc.	~~763948~~ ~~[illegible]~~	~~1011~~ 1021	/	2	2.0	1	~~7000~~	~~Reg~~	✓			
						2	~~4800~~ 5000	~~From~~ Reg				
						3	2500	Mid	1			
						4	1000	From				
						TOTAL	8500					
Kenan	335	1011	/	3	2.0	1	7000	Reg	✓			
						2	1900	From				
						3			1			
						4						
						TOTAL	8900					
Petro-Chemical Transport, Inc	G129	1025	/	1	2.0	1	~~5~~000	Reg	✓			
						2	4000	Mid				
						3			1			
						4						
						TOTAL	9000					
Florida Rock & Tank Lines	RW 9935	1048	/	3	3.0	1	~~5~~000	Reg	✓			
						2	800	Mid				
						3			1			
						4						
						TOTAL	5800					

TRKLEAK.FRM

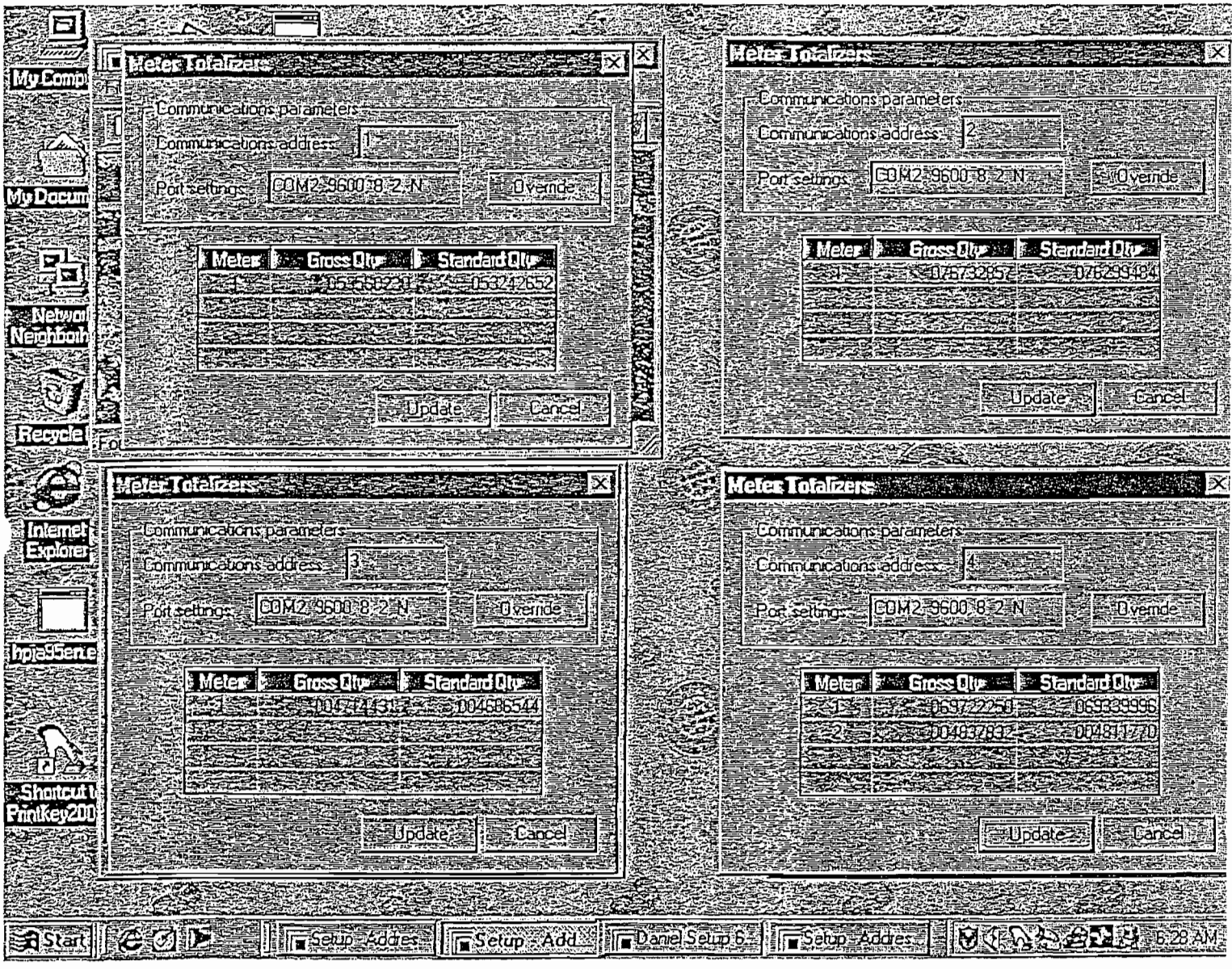
PRODUCT DISPENSED

COMPANY: COASTAL FUELS - PORT CANAVERAL
FACILITY: FLARE
DATE: 08/26/2003

LOCATION NO.	METER NO.	PRODUCT	PRODUCT INITIAL	PRODUCT FINAL	STATION	RACK TOTALS DIESEL	RACK TOTALS GASOLINE
1	1	LSD	53560230	53588731	28,501		
2	1	RNL	76732857	76745567	12,710		
3	1	SNL	4714431	4714431	0		
4	1	RNL	69722250	69733550	11,300		
4	2	SNL	4837832	4837832	0	28,501	24,010
5	1	LSD	45726247	45757210	30,963		
6	1	RNL	66482028	66504530	22,502		
7	1	SNL	18839350	18842750	3,400		
8	1	RNL	59119623	59132650	13,027		
8	2	SNL	3786399	3788475	2,076	30,963	41,005
9	1	LSD	13458561	13467896	9,335		
10	1	RNL	85422765	85440566	17,801		
11	1	SNL	23565467	23569470	4,003		
12	1	RNL	484969	499352	14,383		
12	2	SNL	54262	54740	478	9,335	36,665

TOTAL PRODUCT DISPENSED (GALLONS)	170,479
TOTAL DIESEL DISPENSED (GALLONS)	68,799
TOTAL GASOLINE DISPENSED (GALLONS)	101,680
TOTAL GASOLINE DISPENSED (LITERS)	384,859

VAPOR TEST



START

Page1

RNL

SNL

LSD

Tuesday, Aug 26, 2003 06:28 AM

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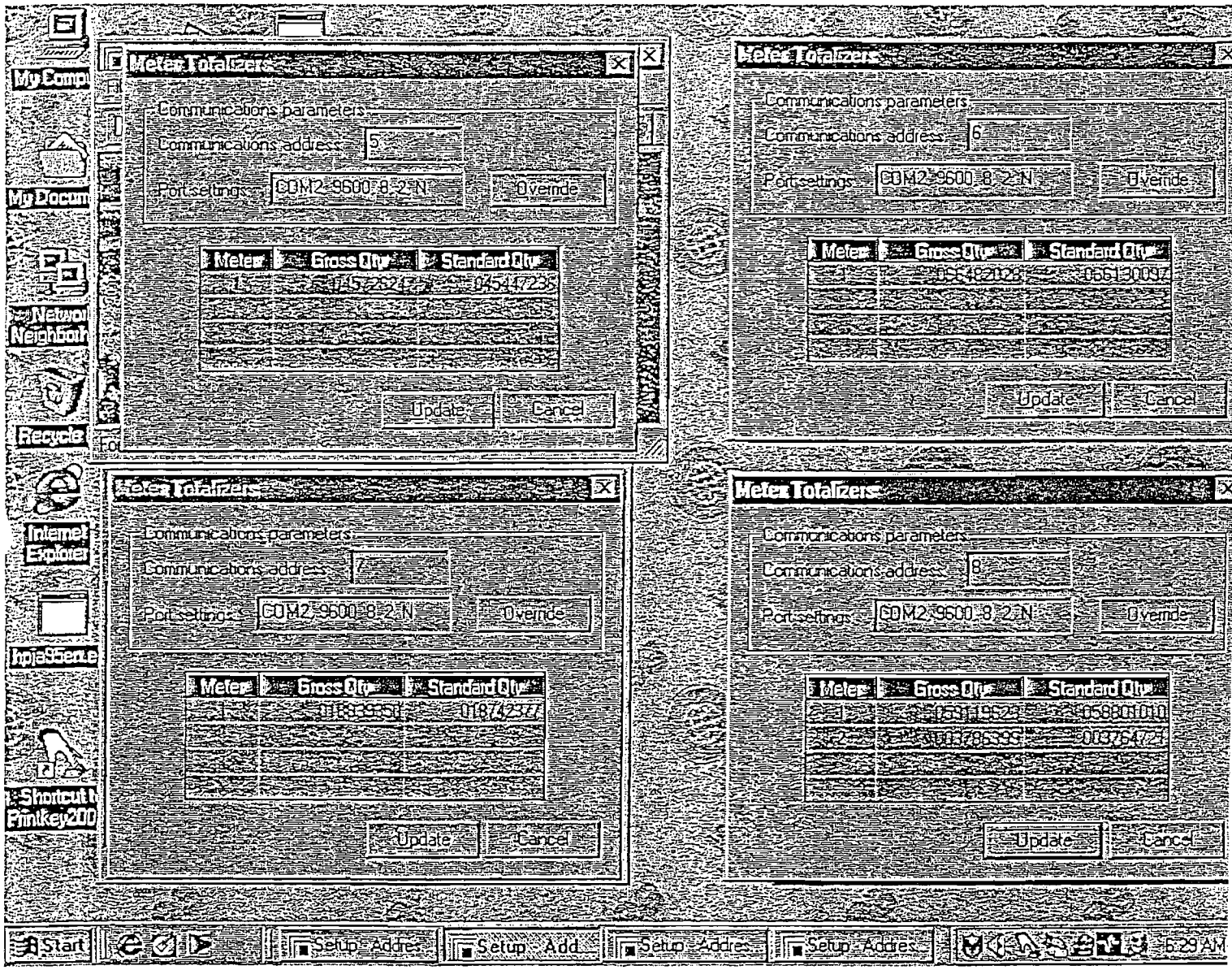

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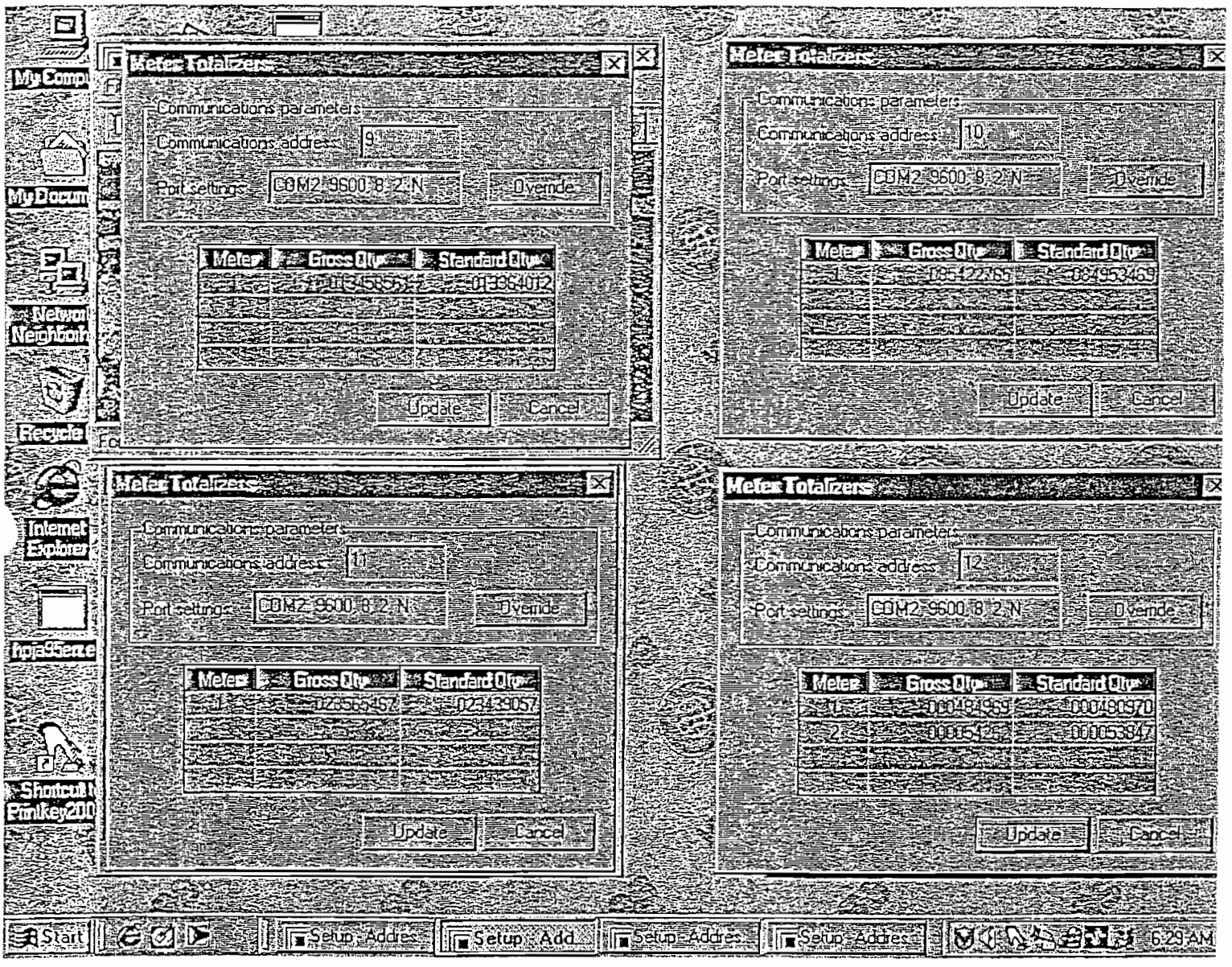
Page 2



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Page 3

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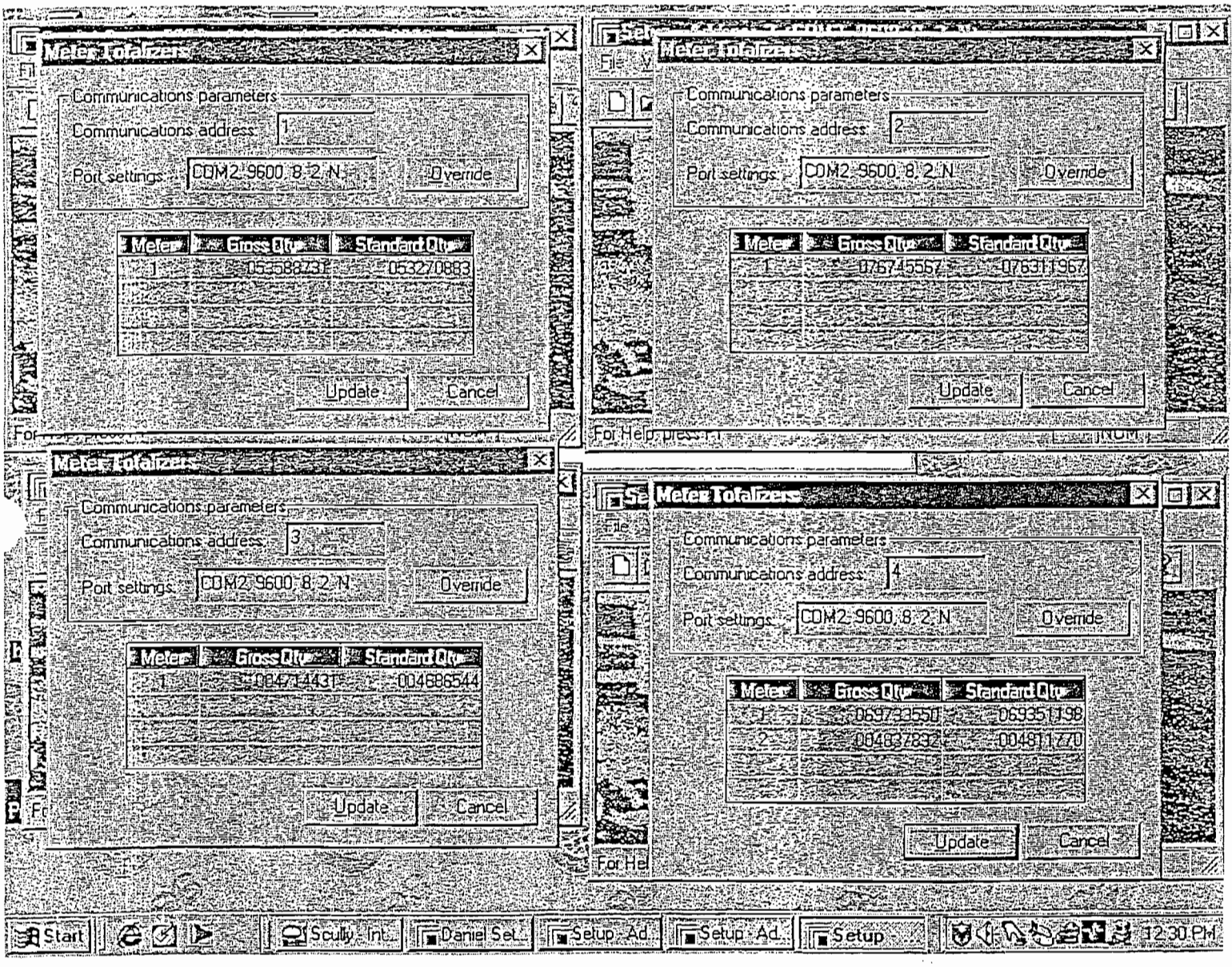
VAPOR TEST



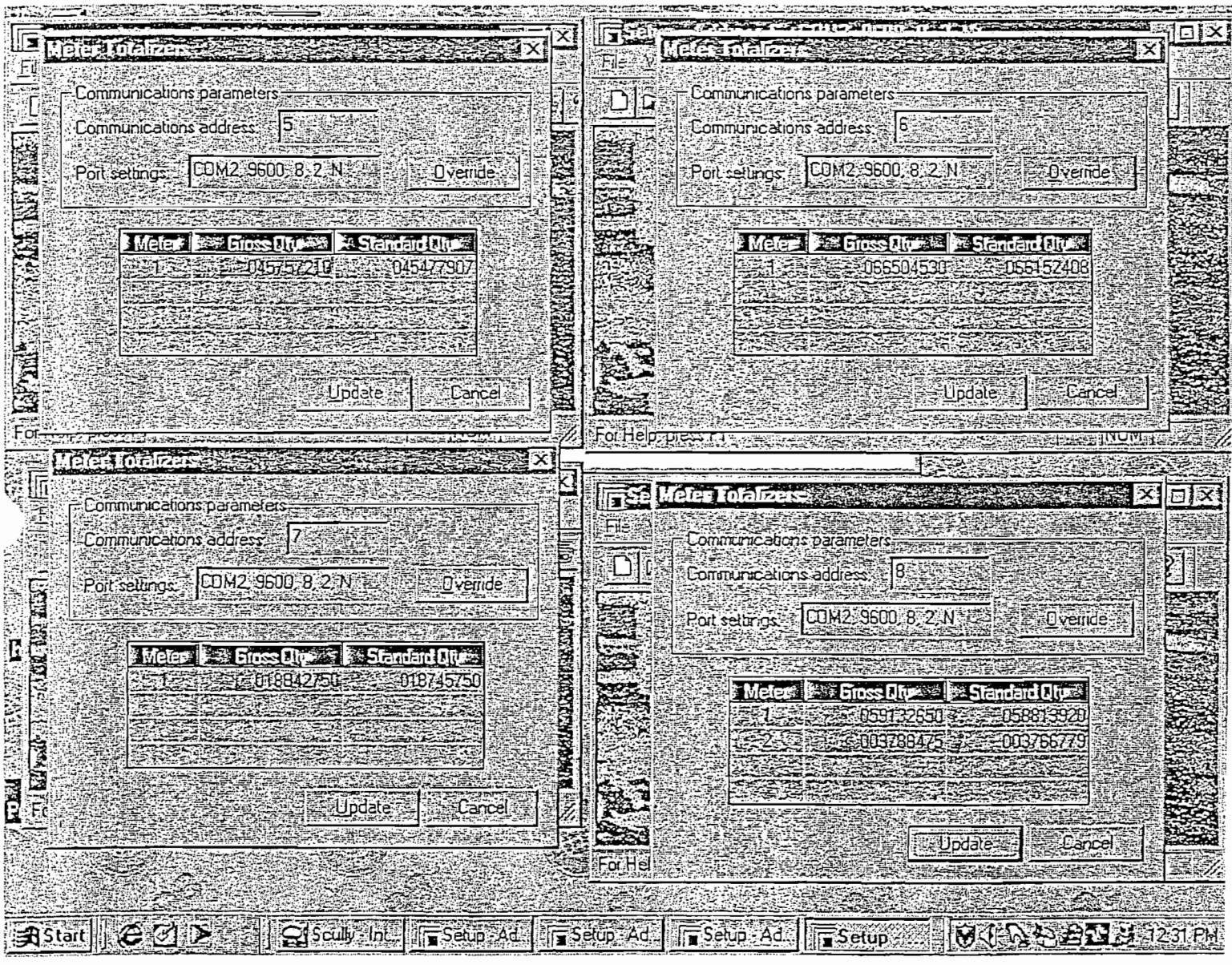
LSD = 68,799 DR. BALS.

SNL = 9,957 DR. BALS.

RUNL = 91,723 DR. BALS.

FINISH

Page 1



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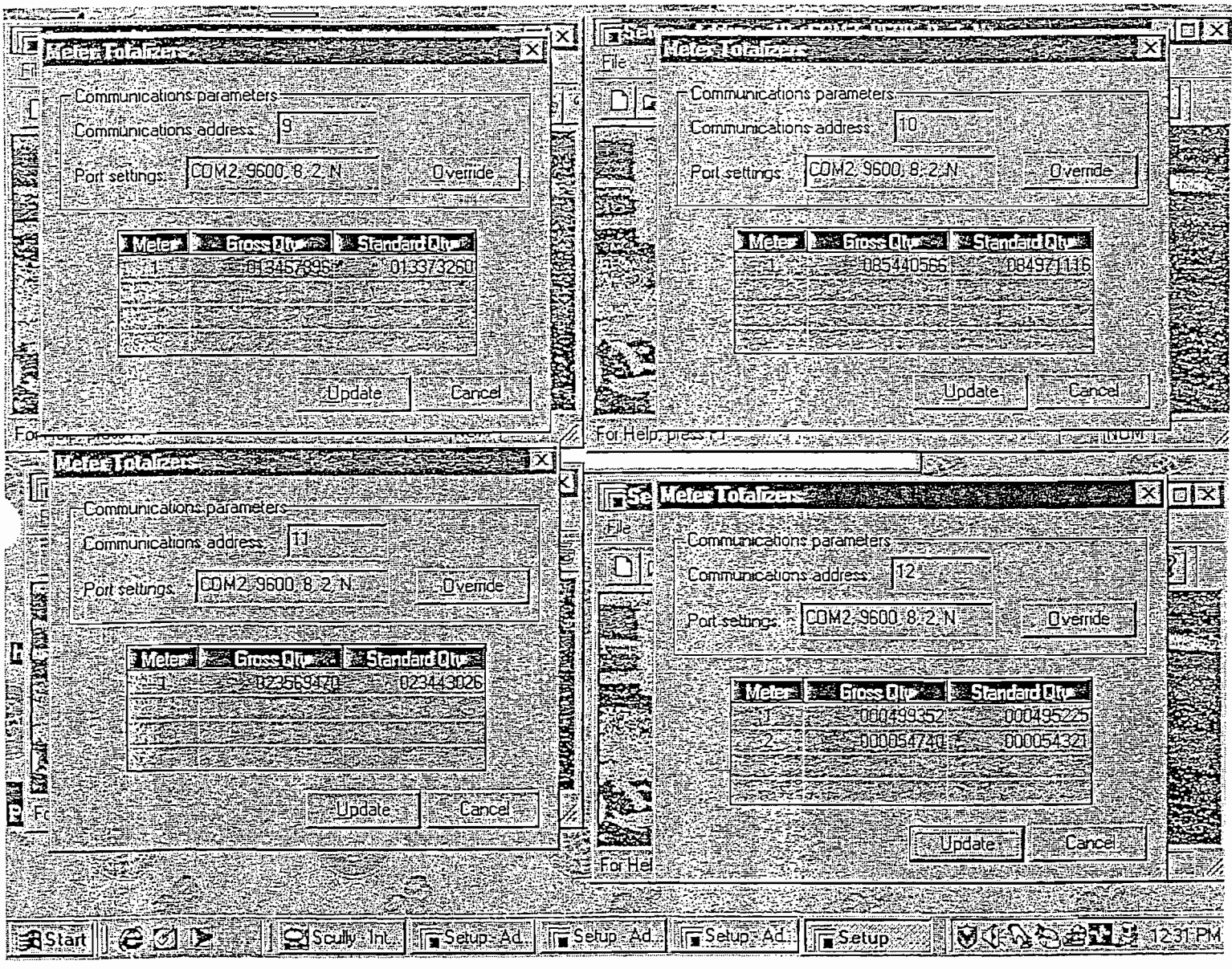
Page 2



Finish
Page 3

VRU EMISSION CALCULATIONS

COMPANY: COASTAL FUELS - PORT CANAVERAL
FACILITY: VAPOR COMBUSTION UNIT
DATE: 08/26/2003

	METER				INLET VOC, (AS PROPANE)			OUTLET VOC, (AS PROPANE)			CARBON MONOXIDE			CARBON DIOXIDE			INLET		OUTLET		FLARE
TIME (min)	RDG. cf #1	STATIC PRESSURE ("H2O)	METER TEMP. (deg f)	BAROM. PRESSURE ("Hg)	ANALYZER READING (% CHART)	INSTRU. SCALE (%)	CONC. (%)	ANALYZER READING (% CHART)	INSTRU. SCALE (PPM)	CONC. (PPM)	ANALYZER READING (% CHART)	INSTRU. SCALE (PPM)	CONC. (PPM)	ANALYZER READING (% CHART)	INSTRU. SCALE (%)	CONC. (%)	GAS VOLUME (M3)*	MASS (mg)	GAS VOLUME (M3)*	MASS (mg)	CONTROL EFF. (%)
0																					
5	1100	1	73	30.05	20	100	20	0	1,000	0	0.5	1,000	5	2	20	0.4	31.07	11,390,041	5031.48	0	100.00
10	1600	1	73	30.05	8	100	8	0	1,000	0	0.5	1,000	5	1	20	0.2	14.12	2,070,917	1987.91	0	100.00
15	1700	1	73	30.05	6	100	6	2	1,000	20	0.5	1,000	5	1	20	0.2	2.82	310,637	288.05	10,560	96.60
20	2000	1	72	30.05	5	100	5	3	1,000	30	0.5	1,000	5	1	20	0.2	8.49	778,053	709.42	39,011	94.99
25	2200	1	72	30.05	4.5	100	4.5	2	1,000	20	0.5	1,000	5	1	20	0.2	5.66	466,832	432.89	15,870	96.60
30	2400	0.5	73	30.05	4	100	4	2	1,000	20	0.5	1,000	5	1	20	0.2	5.64	413,678	383.60	14,063	96.60
35	2500	0.5	73	30.05	3.8	100	3.8	2	1,000	20	0.5	1,000	5	1	20	0.2	2.82	196,497	182.21	6,680	96.60
40	2700	0.8	73	30.05	8	100	8	3	1,000	30	0.5	1,000	5	1	20	0.2	5.65	827,962	754.93	41,513	94.99
45	2900	0.8	73	30.05	21	100	21	4	1,000	40	1.5	1,000	15	1	20	0.2	5.65	2,173,401	1938.49	142,130	93.46
50	3200	0.6	74	30.05	33	100	33	3	1,000	30	5	1,000	50	2.5	20	0.5	8.45	5,110,925	1728.28	95,038	98.14
55	3600	0.5	74	30.05	37.5	100	37.5	1.5	1,000	15	9	1,000	90	3.5	20	0.7	11.26	7,741,934	1853.83	50,971	99.34
60	4100	1	75	30.05	40	100	40	4.5	1,000	45	12	1,000	120	7	20	1.4	14.07	10,315,874	1209.86	99,795	99.03
65	4800	0.5	75	30.05	44	100	44	2	1,000	20	17	1,000	170	6	20	1.2	19.67	15,867,057	2176.78	79,801	99.50
70	4800	0.5	75	30.05	45	100	45	2	1,000	20	1	1,000	10	2	20	0.4					
75	4900	1	76	30.05	44	100	44	1	1,000	10	1.5	1,000	15	4	20	0.8	2.81	2,265,258	478.69	8,774	99.61
80	5200	1	76	30.05	22	100	22	2	1,000	20	8	1,000	80	4	20	0.8	8.43	3,397,887	709.34	26,004	99.23
85	5400	1	76	30.05	12	100	12	1.5	1,000	15	5	1,000	50	2.5	20	0.5	5.62	1,235,595	421.74	11,596	99.06
90	6200	2	76	30.05	10	100	10	2	1,000	20	4	1,000	40	3	20	0.6	22.52	4,128,704	1165.05	42,711	98.97
95	7000	1	77	30.05	18	100	18	3.5	1,000	35	6	1,000	60	5	20	1	22.43	7,399,767	1227.66	78,761	98.94
100	7700	1	78	30.05	35	100	35	3.5	1,000	35	15	1,000	150	6	20	1.2	19.59	12,566,479	1720.37	110,371	99.12
105	7900	0.5	79	30.05	43	100	43	0.5	1,000	5	8	1,000	80	4	20	0.8	5.58	4,397,533	923.32	8,462	99.81
110	7900	0.5	80	30.05	43	100	43	2	1,000	20	1	1,000	10	1.5	20	0.3					
115	8100	1	78	30.05	42	100	42	3	1,000	30	3	1,000	30	2	20	0.4	5.60	4,308,507	1845.96	101,509	97.64
120	9100	1	79	30.05	46	100	46	3	1,000	30	20	1,000	200	8	20	1.6	27.93	23,550,432	2410.51	132,554	99.44
125	9700	1	79	30.07	41	100	41	2.5	1,000	25	15	1,000	150	6	20	1.2	16.77	12,602,723	1729.68	79,262	99.37
130	10200	1	80	30.07	34	100	34	2.5	1,000	25	15	1,000	150	5	20	1	13.95	8,693,071	1433.51	65,691	99.24
135	10600	0.5	82	30.07	42	100	42	1	1,000	10	13	1,000	130	4.5	20	0.9	11.10	8,548,660	1579.15	28,946	99.66
140	10600	1	82	30.07	46.5	100	46.5	1	1,000	10	10	1,000	100	2.5	20	0.5					
145	10700	1	83	30.07	45.5	100	45.5	1	1,000	10	10	1,000	100	2	20	0.4	2.77	2,313,820	988.76	18,124	99.22
150	11000	1	84	30.07	35	100	35	3	1,000	30	10	1,000	100	2.5	20	0.5	8.31	5,329,770	1783.85	98,094	98.16
155	11600	1	84	30.07	25	100	25	3	1,000	30	10	1,000	100	4	20	0.8	16.62	7,613,957	1579.40	86,851	98.86
160	12800	1.5	83	30.07	27	100	27	3	1,000	30	18	1,000	180	7	20	1.4	33.33	16,496,530	1932.66	106,277	99.36
165	13200	0.8	88	30.07	29	100	29	2	1,000	20	12	1,000	120	5	20	1	10.99	5,842,296	967.80	35,480	99.39
170	13200	0.5	97	30.07	36.5	100	36.5	0	1,000	0	1	1,000	10	2.5	20	0.5					
175	13200	0.5	101	30.07	35	100	35	0	1,000	0	0	1,000	0	2	20	0.4					
180	13800	0.5	89	30.07	28	100	28	4	1,000	40	5	1,000	50	4	20	0.8	16.44	8,439,661	1755.13	128,686	98.48
185	13800	0.5	92	30.07	40	100	40	3	1,000	30	8	1,000	80	4	20	0.8					
190	14500	0.6	90	30.07	47.5	100	47.5	3	1,000	30	14	1,000	140	6	20	1.2	19.15	16,677,197	2287.92	125,813	99.25
195	14800	1	89	30.07	45	100	45	3	1,000	30	13	1,000	130	6.5	20	1.3	8.23	6,790,152	860.15	47,300	99.30
200	14800	1	90	30.07	25	100	25	3	1,000	30	10	1,000	100	6	20	1.2					
205	15400	1	92	30.07	16	100	16	1	1,000	10	8	1,000	80	8	20	1.6	16.37	4,802,310	497.14	9,113	99.81
210	15800	0.5	99	30.07	10	100	10	2	1,000	20	2	1,000	20	5	20	1	10.77	1,973,496	330.26	12,107	99.39
215	15800	0.5	105	30.07	9	100	9	2	1,000	20	0.5	1,000	5	4.5	20	0.9					
220	15800	1	100	30.07	9	100	9	3	1,000	30	0	1,000	0	3	20	0.6					
225	16400	1	94	30.07	20	100	20	4	1,000	40	7	1,000	70	3.5	20	0.7	16.32	5,981,217	1420.79	104,172	98.26
230	17100	1	91	30.07	34	100	34	3	1,000	30	16	1,000	160	5	20	1	19.14	11,927,335	1961.91	107,885	99.10
235	17900	1	90	30.07	40	100	40	4	1,000	40	18	1,000	180	7.5	20	1.5	21.91	16,065,911	1752.96	128,527	99.20
240	18200	0.4	99	30.07	48	100	48	1	1,000	10	15	1,000	150	7	20	1.4	8.07	7,102,850	837.53	15,352	99.78
245	18200	0.4	100	30.07	47	100	47	0	1,000	0	0	1,000	0	11	20						
250	18200	0.3	100	30.07	45	100	45	0	1,000	0	0	1,000	0	10	20						

VCU

~~VRU~~ EMISSION CALCULATIONS

COMPANY: COASTAL FUELS - PORT CANAVERAL
FACILITY: VAPOR COMBUSTION UNIT
DATE: 08/26/2003

	METER				INLET VOC, (AS PROPANE)			OUTLET VOC, (AS PROPANE)			CARBON MONOXIDE			CARBON DIOXIDE			INLET		OUTLET		FLARE
TIME	RDG. cf	STATIC PRESSURE	METER TEMP.	BAROM. PRESSURE	ANALYZER READING	INSTRU. SCALE	CONC.	ANALYZER READING	INSTRU. SCALE	CONC.	ANALYZER READING	INSTRU. SCALE	CONC.	ANALYZER READING	INSTRU. SCALE	CONC.	GAS VOLUME	MASS	GAS VOLUME	MASS	CONTROL EFF.
(min)	#1	("H2O)	(deg f)	("Hg)	(% CHART)	(%)	(%)	(% CHART)	(PPM)	(PPM)	(% CHART)	(PPM)	(PPM)	(% CHART)	(%)	(%)	(M3)*	(mg)	(M3)*	(mg)	(%)
255	18700	1	94	30.07	43	100	43	2	1,000	20	5	1,000	50	6	20	1.2	13.60	10,716,347	1485.10	54,444	99.49
260	19500	1	94	30.07	32	100	32	5	1,000	50	20	1,000	200	3	20	0.6	21.75	12,759,929	3451.85	316,362	97.52
265	20700	1.5	94	30.07	37.5	100	37.5	2	1,000	20	16	1,000	160	2	20	0.4	32.67	22,456,919	9376.11	343,728	98.47
270	21800	1	95	30.07	40	100	40	2.5	1,000	25	15	1,000	150	7	20	1.4	29.86	21,891,613	2573.01	117,908	99.46
275	21800	0.5	100	30.07	31	100	31	2.5	1,000	25	9	1,000	90	5	20	1					
280	22100	0.7	101	30.07	15	100	15	2	1,000	20	4	1,000	40	5	20	1	8.05	2,213,348	369.64	13,551	99.39
285	22500	0.4	103	30.07	10	100	10	1	1,000	10	3	1,000	30	7	20	1.4	10.69	1,958,996	233.01	4,271	99.78
290	22700	0.4	105	30.07	7.5	100	7.5	3	1,000	30	0.5	1,000	5	3	20	0.6	5.32	732,023	206.74	11,369	98.45
295	23100	0.6	107	30.07	8	100	8	3	1,000	30	0	1,000	0	6	20	1.2	10.62	1,556,901	216.13	11,885	99.24
300	23100	0	112	30.07	9	100	9	0	1,000	0	0	1,000	0	4	20	0.8					
305	23100	0	112	30.07	9	100	9	0	1,000	0	0	1,000	0	3	20	0.6					
310	23100	0.5	116	30.07	8.5	100	8.5	0	1,000	0	0	1,000	0	2	20	0.4					
315	23100	0	117	30.07	8	100	8	0	1,000	0	0	1,000	0	2	20	0.4					
320	23100	0	117	30.07	7.5	100	7.5	0	1,000	0	0	1,000	0		20	0					
325	23100	0	118	30.07	7.5	100	7.5	0	1,000	0	0	1,000	0	2	20	0.4					
330	23300	0.5	109	30.07	8	100	8	6	1,000	60	0.5	1,000	5	1	20	0.2	5.29	775,525	673.35	74,055	90.45
335	23400	0.5	108	30.07	10	100	10	4	1,000	40	2	1,000	20	5	20	1	2.65	485,556	80.76	5,921	98.78
340	24300	1	105	30.07	19	100	19	3	1,000	30	5	1,000	50	7	20	1.4	24.00	8,357,295	988.30	54,347	99.35
345	24700	1	105	30.07	20	100	20	4	1,000	40	10	1,000	100	5	20	1	10.67	3,909,846	645.07	47,297	98.79
350	24900	0.5	107	30.07	13	100	13	3	1,000	30	4	1,000	40	2	20	0.4	5.31	1,264,673	540.43	29,718	97.65
355	25600	0.5	107	30.07	20	100	20	2	1,000	20	4	1,000	40	3	20	0.6	18.58	6,809,779	1921.60	70,446	98.97
360	25600	0.5	107	30.07	25	100	25	2	1,000	20	4	1,000	40	4	20	0.8					
TOTAL	25600																705.166	364,003,677	76,040	3,469,155	
AVERAGE		0.7	90	30.06	25.6		26	2.2		22	6		63	4		0.8					98.48

* At standard conditions of 68 deg F and 29.92in. Hg)

EQUATIONS

VOLUME

$$V_{std} = (V_f - V_i) \times Y_m \times [P_{bar} + (P_g/13.6)]/P_{std} \times [T_{std}/T_m]$$

where:

V_{std} = Meter volume at standard conditions, $ft.^3$ at 528°Rankin and 29.92 in. Hg

Y_m = Meter correction factor

V_f = Final meter reading ($ft.^3$)

V_i = Initial meter reading ($ft.^3$)

P_{bar} = Barometric pressure (in. Hg)

P_g = Static pressure in duct (in. H_2O)

P_{std} = Standard pressure, 29.92 in. Hg

T_{std} = Absolute standard temperature, 528°Rankin

T_m = Absolute meter temperature (°Rankin)

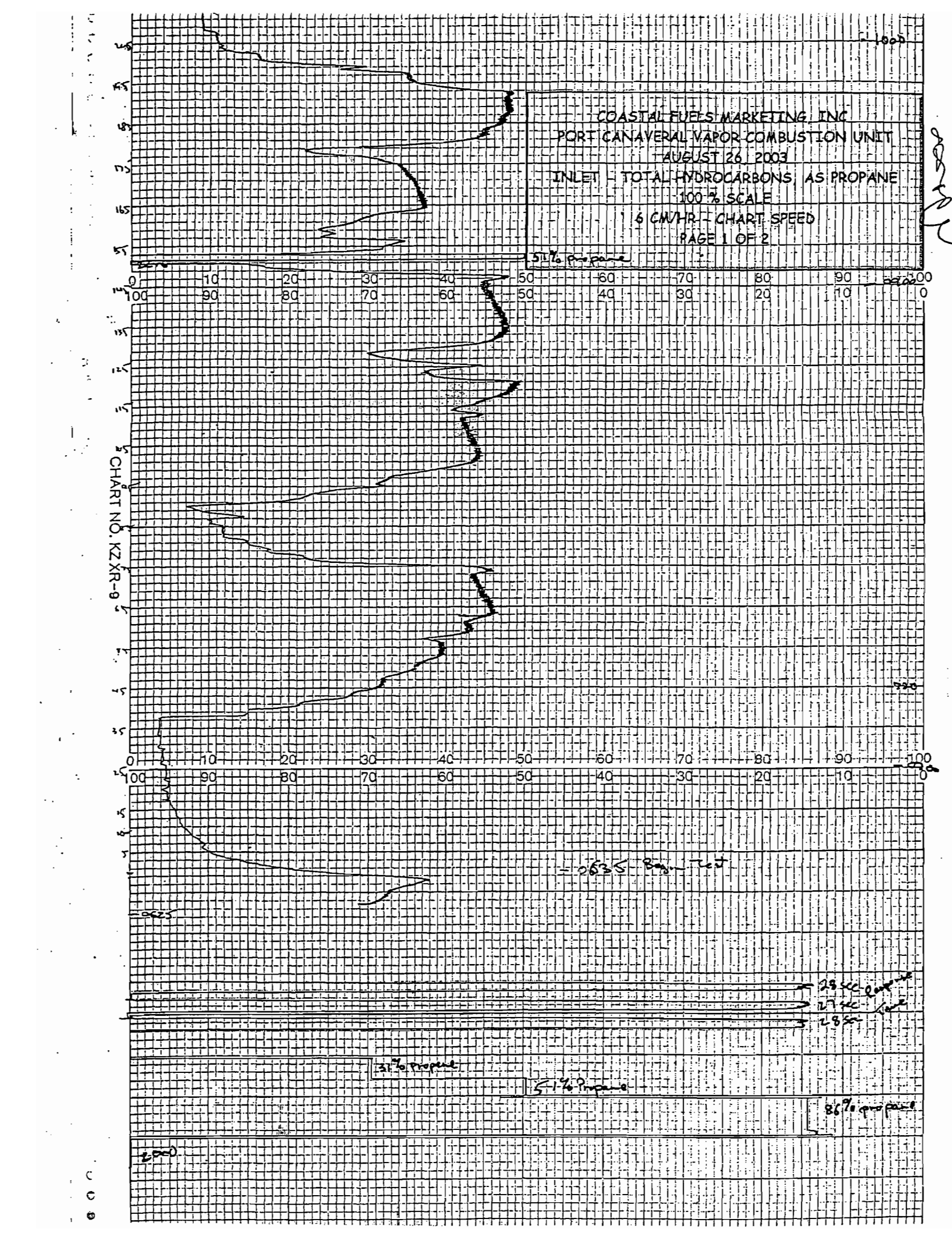
ORIFICE VELOCITY (5 MINUTE INTERVAL)

$$V_o = V_{std} / (A_o \times 5 \text{ min} \times 60 \text{ sec/min})$$

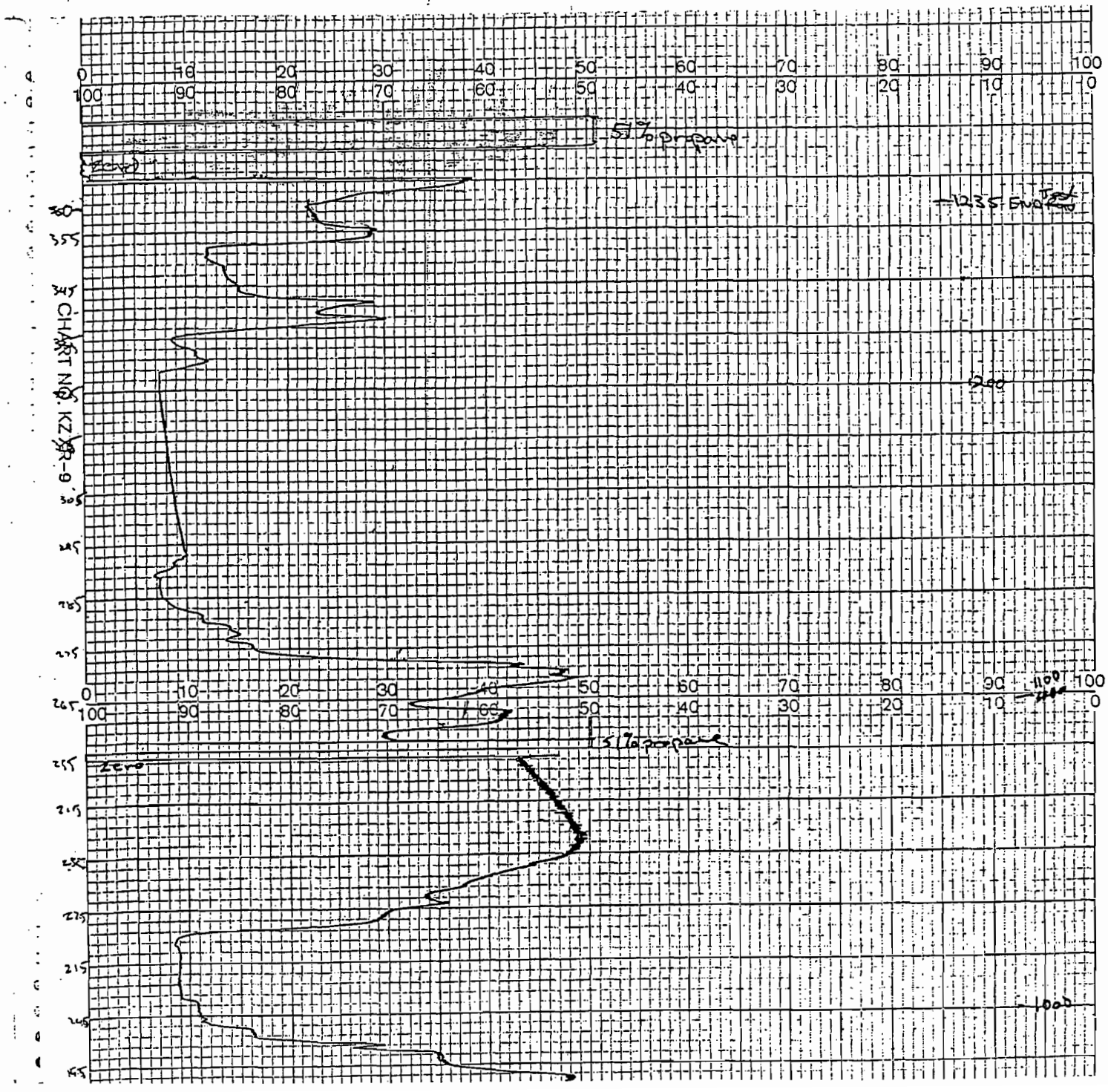
where:

V_o = Velocity at flare burner orifice (ft./sec.)

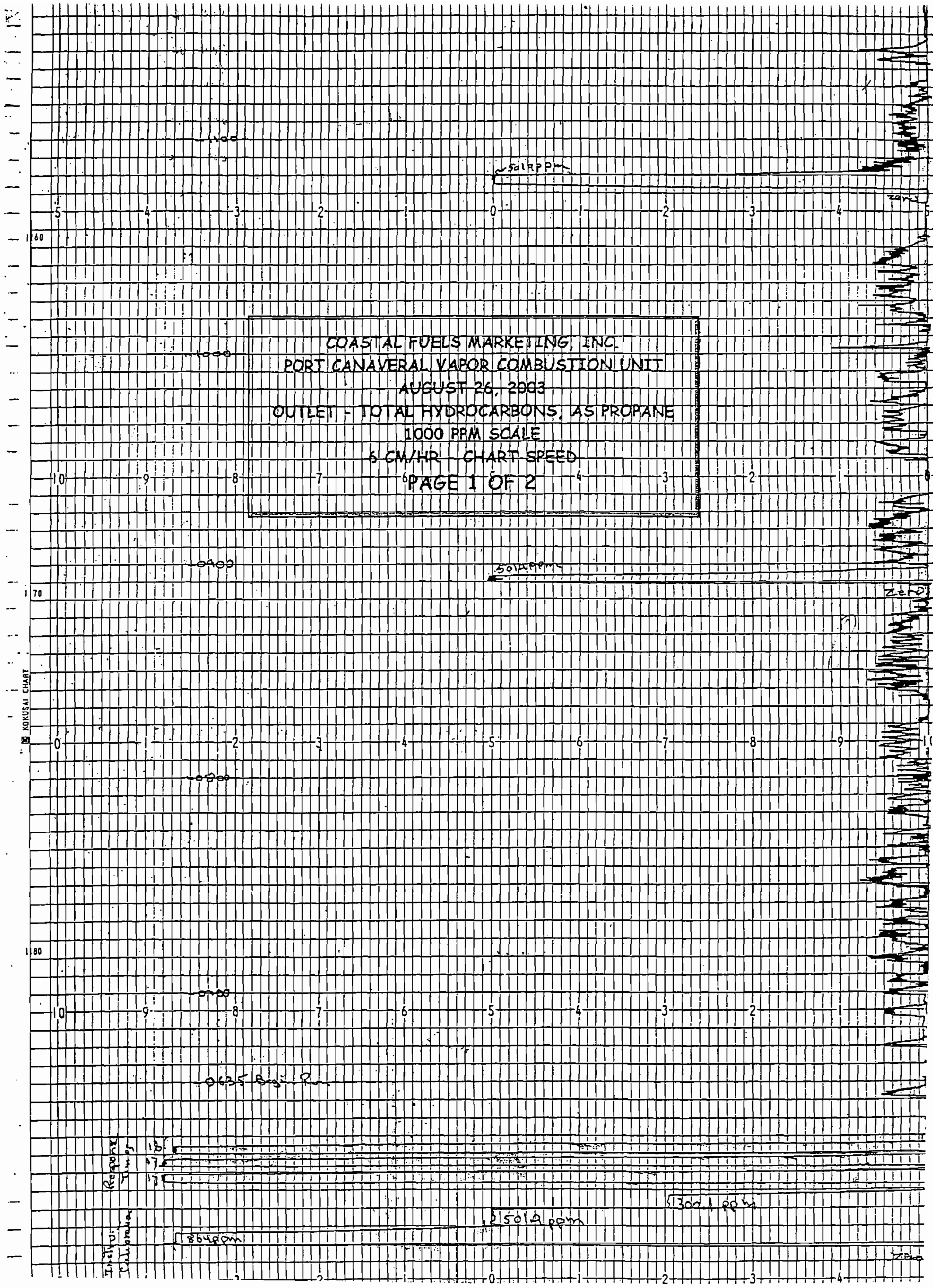
A_o = Total area of orifice openings ($ft.^2$)


COASTAL FUELS MARKETING, INC
PORT CANAVERAL VAPOR COMBUSTION UNIT
AUGUST 26, 2003
INLET - TOTAL HYDROCARBONS, AS PROPANE
100 % SCALE
6 CM/HR - CHART SPEED
PAGE 1 OF 2
CHART NO. KZXR-9
51% propane
21% Propane
51% Propane
86% propane
28 cc
27 cc
28 cc
0 10 20 30 40 50 60 70 80 90 100

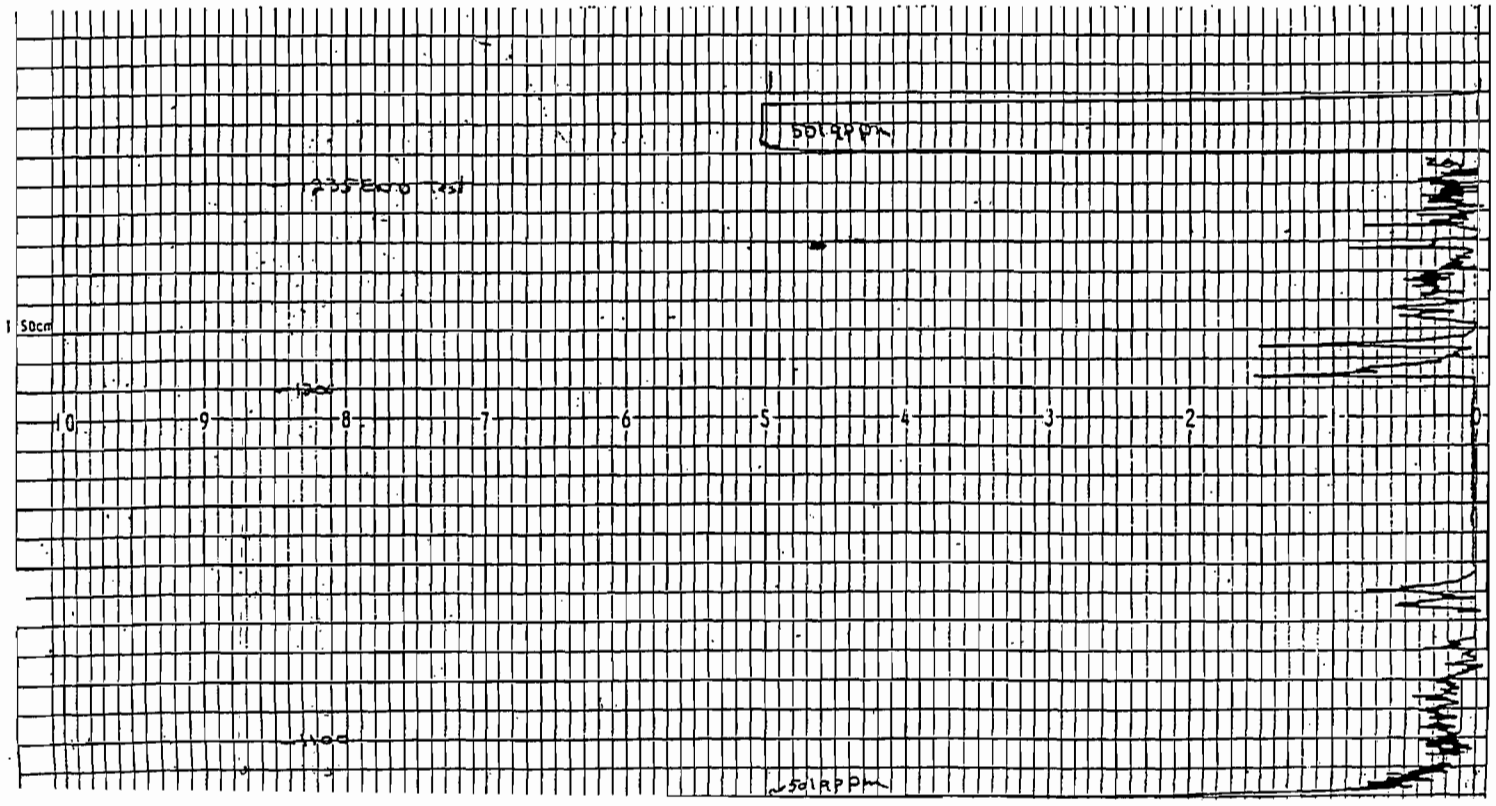
COASTAL FUELS MARKETING, INC.
PORT CANAVERAL VAPOR COMBUSTION UNIT
AUGUST 26, 2003
INLET - TOTAL HYDROCARBONS, AS PROPANE
100 % SCALE
6 CM/HR - CHART SPEED
PAGE 2 OF 2

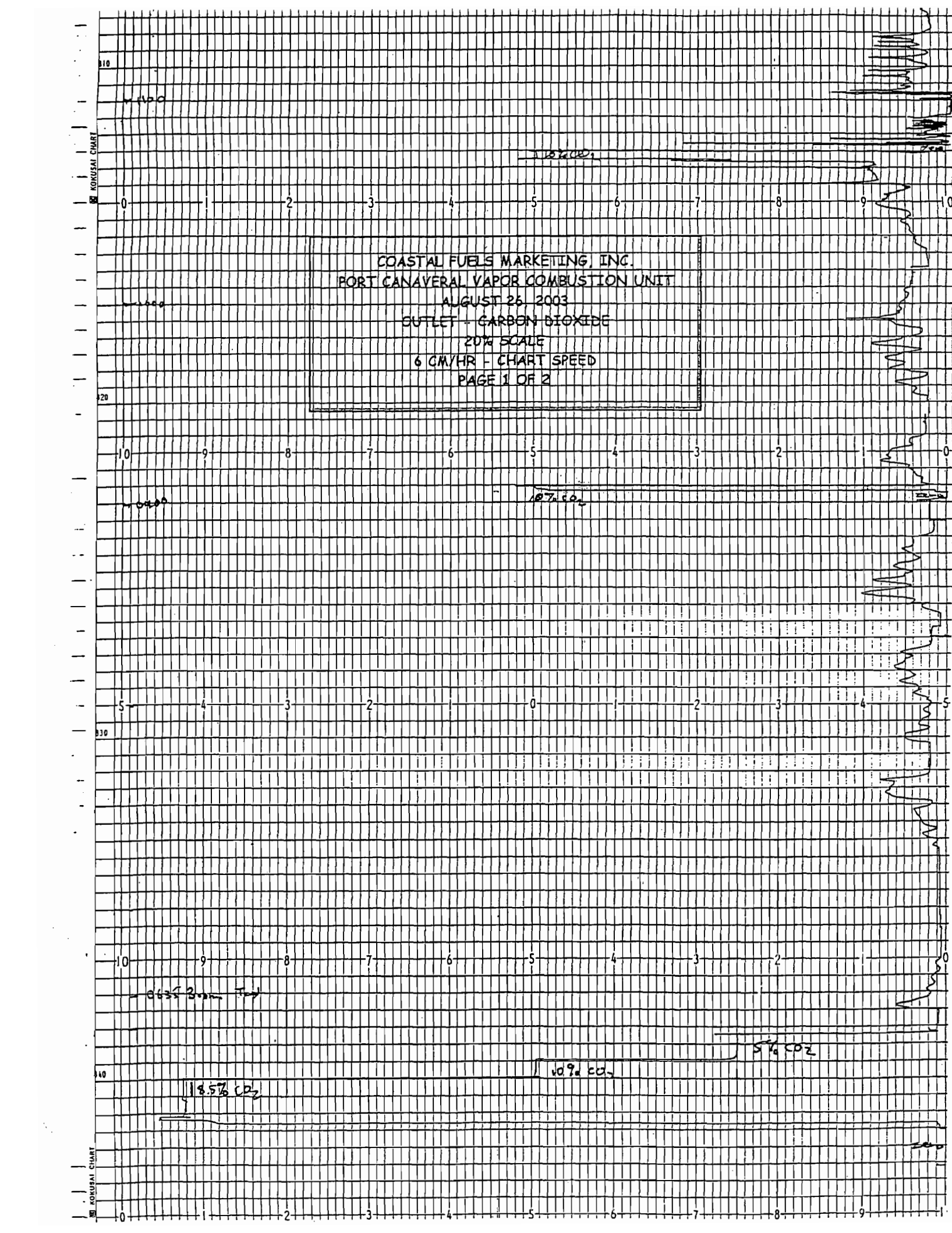


COASTAL FUELS MARKETING, INC.
PORT CANAVERAL VAPOR COMBUSTION UNIT
AUGUST 26, 2003
OUTLET - TOTAL HYDROCARBONS, AS PROPANE
1000 PPM SCALE
6 CM/HR - CHART SPEED
PAGE 1 OF 2

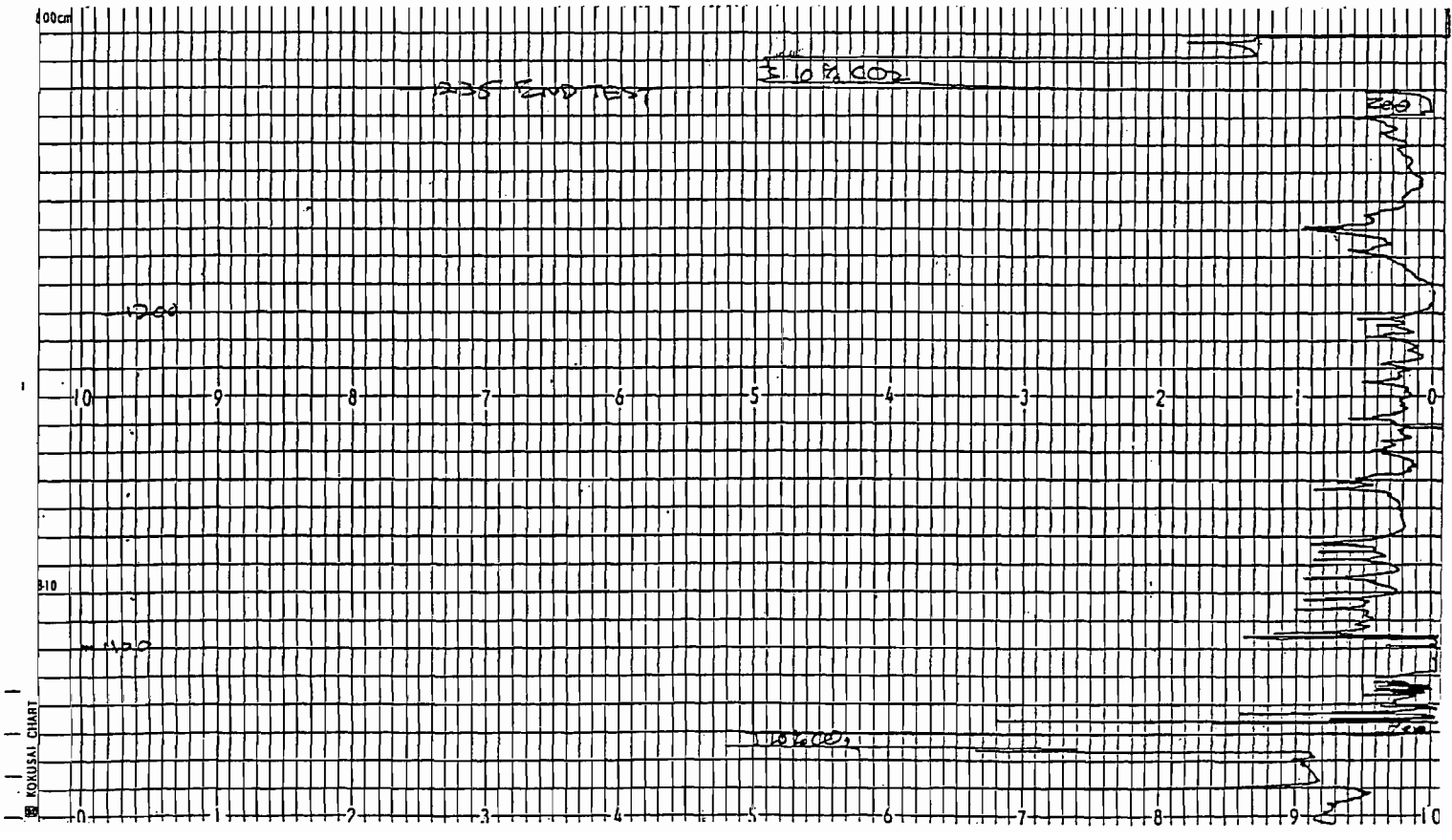


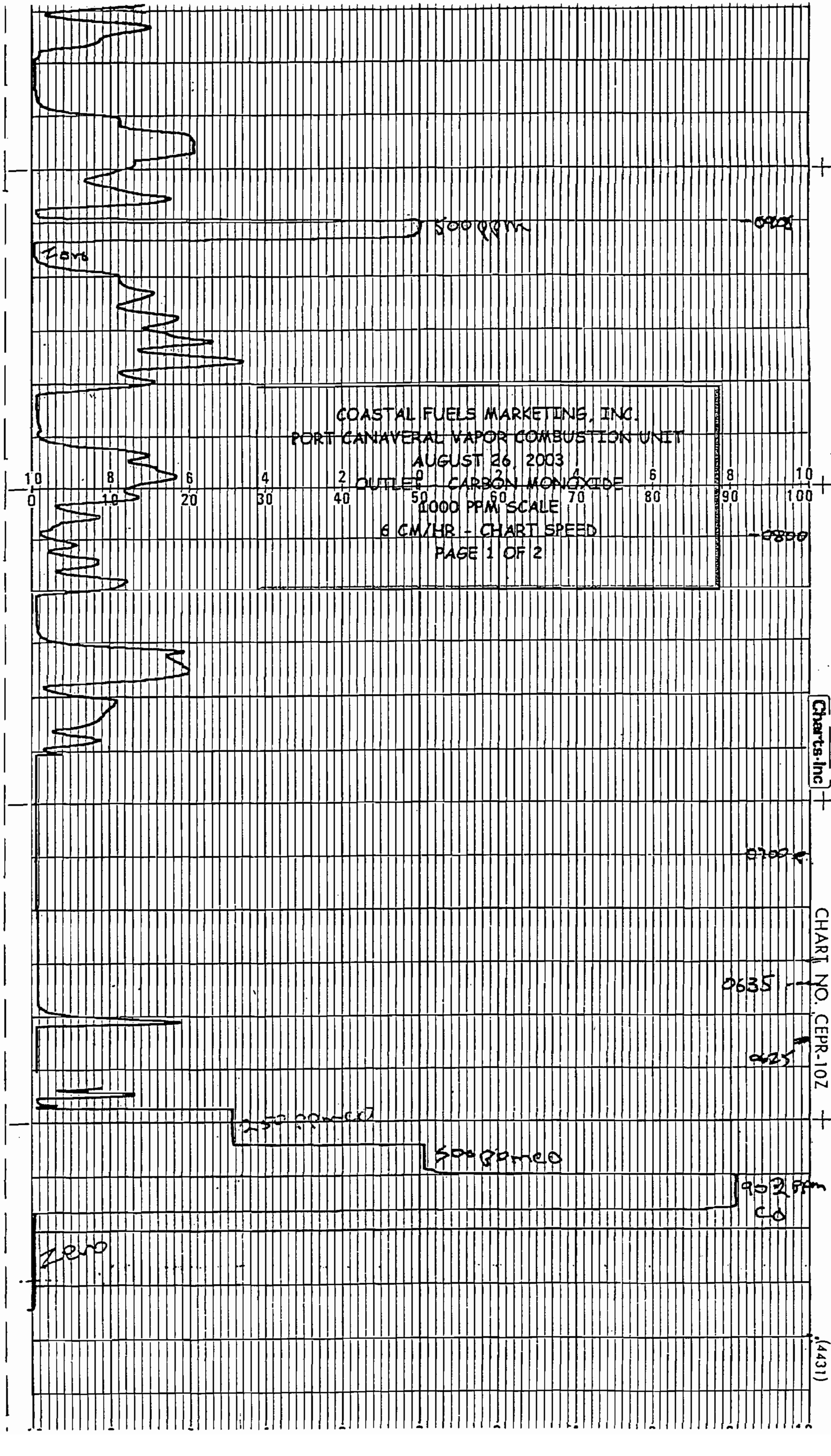
COASTAL FUELS MARKETING, INC.
PORT CANAVERAL VAPOR COMBUSTION UNIT
AUGUST 26, 2003
OUTLET - TOTAL HYDROCARBONS, AS PROPANE
1000 PPM SCALE
6 CM/HR - CHART SPEED
PAGE 2 OF 2




COASTAL FUELS MARKETING, INC.
PORT CANAVERAL VAPOR COMBUSTION UNIT
AUGUST 26, 2003
OUTLET - CARBON DIOXIDE
20% SCALE
6 CM/HR - CHART SPEED
PAGE 1 OF 2
KOKUSAI CHART
KOKUSAI CHART

COASTAL FUELS MARKETING, INC.
PORT CANAVERAL VAPOR COMBUSTION UNIT
AUGUST 26, 2003
OUTLET - CARBON DIOXIDE
20% SCALE
6 CM/HR - CHART SPEED
PAGE 2 OF 2




COASTAL FUELS MARKETING, INC.
PORT CANAVERAL VAPOR COMBUSTION UNIT
AUGUST 26, 2003
OUTLET - CARBON MONOXIDE
1000 PPM SCALE
6 CM/HR - CHART SPEED
PAGE 1 OF 2
Zero
952 ppm CO
250 ppm CO
500 ppm CO
0625
0635
0700
0800
0900
500 ppm
Zero
Charts-Inc
CHART NO. CEPR-10Z
(431)

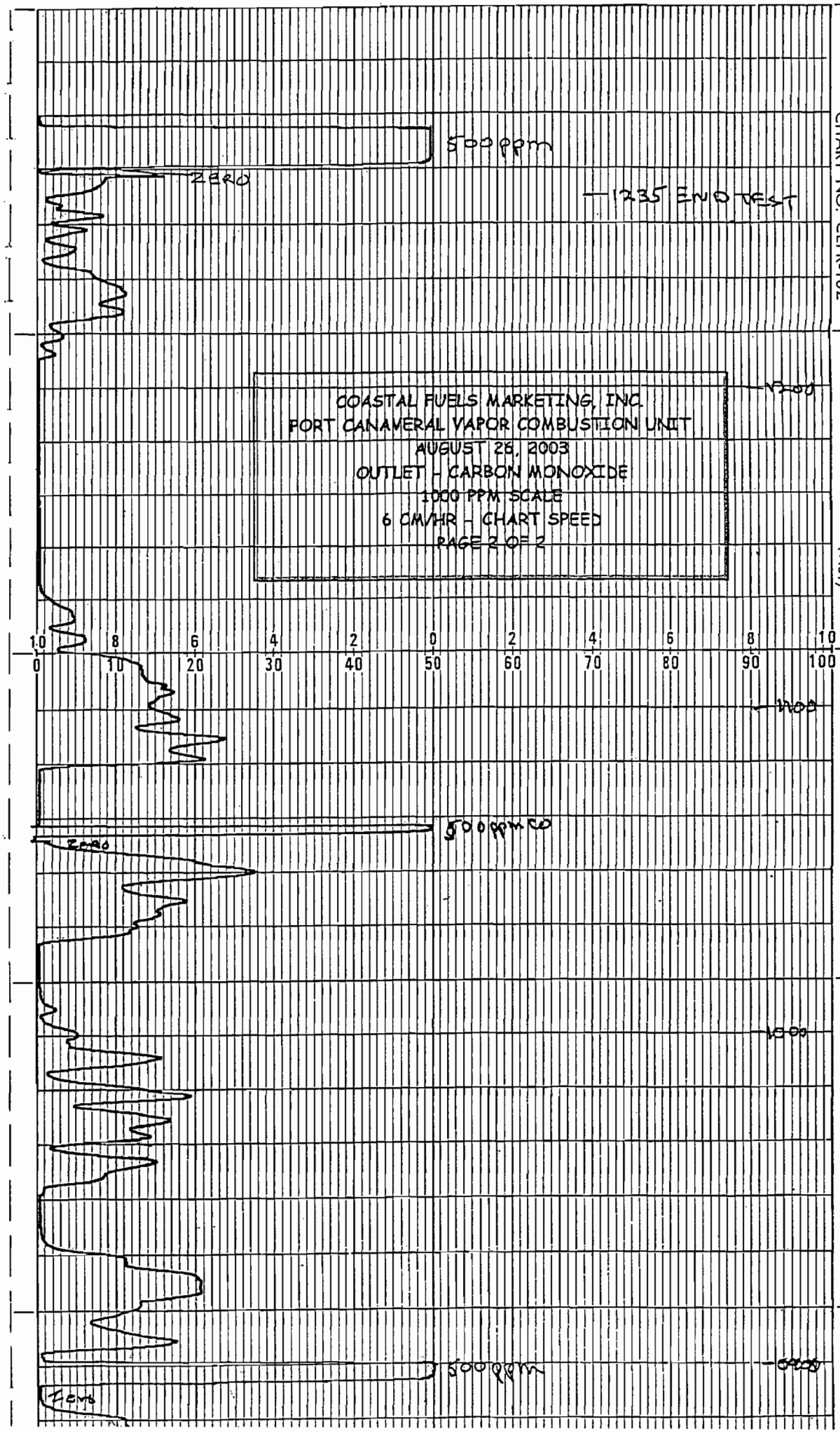


CHART NO. CEPR-10Z
(4431)
500 PPM
ZERO
1235 END TEST
COASTAL FUELS MARKETING, INC.
PORT CANAVERAL VAPOR COMBUSTION UNIT
AUGUST 26, 2003
OUTLET - CARBON MONOXIDE
1000 PPM SCALE
6 CM/HR - CHART SPEED
PAGE 2 OF 2
1200
1100
1000
900
1.0 8 6 4 2 0 2 4 6 8 10
0 10 20 30 40 50 60 70 80 90 100
500 PPM CO
ZERO
500 PPM
ZERO

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

GAS DILUTION SYSTEM FIELD EVALUATION

COMPANY	COASTAL FUELS MARKETING, INC.
SOURCE	PORT CANAVERAL VAPOR COMBUSTION UNIT
DATE	08/26/2003
DILUTION INSTRUMENT	ENVIRONICS MODEL 2020
SERIAL #	1899
MEASUREMENT INSTRUMENT	CALIFORNIA ANALYTICAL
SERIAL #	
SUPPLY GAS	8606 PPM

SUPPLY GAS (PPM)	MFM #	PREDICTED GAS CONC. (PPM)	INJECTION #1 (PPM)	#2 (PPM)	#3 (PPM)	AVERAGE (PPM)	ACCEPTABLE RANGE			% DIFFERENCE
8606	2	8100	8100	8050	8060	8070.0	8231.4	to	7908.6	-0.4%
8606	2	2500	2520	2520	2520	2520.0	2570.4	to	2469.6	0.8%
								to		
								to		
MID RANGE		5143	5100	5050	5100	5083.3	5185.0	to	4981.7	-1.2%

EPA METHOD 205 - VERIFICATION OF GAS DILUTION SYSTEMS FOR FIELD INSTRUMENT CALIBRATIONS
40 CFR 51, APPENDIX M

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

1204 North Wheeler Street St. Plant City, Florida 33566 (813) 752-5014

METHOD 25A CALIBRATION

TEST DATA	
DATE	04/26/2003
COMPANY	COASTAL FUEL MARKETING, INC.
SOURCE	PORT CANAVERAL VAPOR COMBUSTION UNIT

INSTRUMENT DATA		
	MONITOR	RECORDER
MANUFACTURER	CALIF. ANAL.	YOKAGAWA
MODEL NO.	HID300(M)	302111
SERIAL NO		
RANGE (%)	100	6 CM/HR

CALIBRATION GASES			
SUPPLIER	AIR PRODUCTS		
CYLINDER #	PROPANE		
CONCENTRATION	99.95		
EXPIRATION DATE			

CALIBRATION ERROR TEST (within 2 hrs. of test)									
Selected Range:	100	%							
Adjusted zero gas response:	0	%							
Adjusted span gas response:	86	%							
Linear Regression Analysis:	Slope:	1	Intercept:	0					
Mid-level gas response:	Predicted:	51	%	Actual:	50.3	%	% diff.	-1.4	
Low-level gas response:	Predicted:	31	%	Actual:	30.5	%	% diff.	-1.6	
RESPONSE TIME TEST									
1) 28 SECONDS			2) 27 SECONDS			3) 28 seconds			
TEST PERIOD									
Start Time: 0635						Stop Time: 1235			

DRIFT DETERMINATION					
	Zero			Span	
Time	Response (ppm)	% diff.(span)	Response (%)	Actual (%)	% diff.(span)
0910	0	0	50	51	-2.0
1050	0	0	50.3	51	-1.4
1240	0	0	50.7	51	-0.6

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

1204 North Wheeler Street St. Plant City, Florida 33566 (813) 752-5014

METHOD 25A CALIBRATION

TEST DATA	
DATE	08/26/2003
COMPANY	COASTAL FUELS MARKETING, INC.
SOURCE	PORT CANAVERAL VAPOR COMBUSTION UNIT

INSTRUMENT DATA		
	MONITOR	RECORDER
MANUFACTURER	CALIF. ANAL.	YOKOGAWA
MODEL NO.	HID300(M)	BD211
INSTR. NO.		
RANGE (PPM)	1,000	6 CM/HR

CALIBRATION GASES			
SUPPLIER	AIRGAS	AIRGAS	AIRGAS
CYLINDER #	SG91655331	SG9102825	SG896044
CONCENTRATION	864	501.9	300.1
EXPIRATION DATE	04/05/2006	07/07/2005	04/02/2006

CALIBRATION ERROR TEST (within 2 hrs. of test)								
Selected Range	1000	ppm						
Adjusted zero gas response	0	ppm						
Adjusted span gas response	864	ppm						
Linear Regression Analysis	Slope:	1	Intercept:	0				
Mid-level gas response	Predicted:	501.9	ppm	Actual:	498	ppm	% diff.	-0.8
Low-level gas response	Predicted:	300.1	ppm	Actual:	295	ppm	% diff.	-1.7

RESPONSE TIME TEST					
1)	17 SECONDS	2)	17 SECOND	3)	17 seconds

TEST PERIOD			
Start Time:	0635	Stop Time:	1235

DRIFT DETERMINATION					
	Zero			Span	
Time	Response (ppm)	% diff (span)	Response (ppm)	Actual (ppm)	% diff.
0855	0	0	500	501.9	-0.4
1048	0	0	500	501.9	-0.4
1240	0	0	502	501.9	0.0

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

1204 North Wheeler Street St. Plant City, Florida 33563 (813) 752-5014

INSTRUMENT CALIBRATION

TEST DATA	
DATE	08/26/2003
COMPANY	COASTAL FUELS MARKETING
SOURCE	PORT CANAVERAL VAPOR COMBUSTION UNIT
PARAMETER	CARBON DIOXIDE
TECHNICIAN	K. ROBERTS

INSTRUMENT DATA		
	MONITOR	RECORDER
MANUFACTURER	CALIF. ANAL.	YOKAGAWA
MODEL NO.	110	SINGLE PEN
SERIAL NO.		
RANGE (%)	20	6 CM/HR

CALIBRATION GASES			
SUPPLIER	Spectra Gases		
CYLINDER #	CC83934		
CONC. (%)	19.9		
EXPIRATION DATE	03/23/2004		

POINT	OBSERVED CONC.	ACTUAL CONC.	PERCENT DIFF.
1	0	0	0.00
2	5	5	0.00
3	9.9	10	-0.50
4	18.5	18.5	0.00

Regression Output:

Constant		-0.0177
Std Err of Y Est		0.0607
R Squared		1.0000
No. of Observations		4
Degrees of Freedom		2
X Coefficient(s)	0.9991	
Std Err of Coef.	0.0044	

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

1204 North Wheeler Street St. Plant City, Florida 33566 (813) 752-5014

INSTRUMENT CALIBRATION

TEST DATA	
DATE	08/26/2003
COMPANY	COASTAL FUELS MARKETING
SOURCE	PORT CANAVERAL VAPOR COMBUSTION UNIT
PARAMETER	CARBON MONOXIDE
TECHNICIAN	K. ROBERTS

INSTRUMENT DATA		
	MONITOR	RECORDER
MANUFACTURER	TECO	METRONIC
MODEL NO.	48	
SERIAL NO.	48-27158-228	
RANGE (PPM)	1000	6CM/HR

CALIBRATION GASES			
SUPPLIER	SPECTRA GASES		
CYLINDER #	CC-126519		
CONC. (%)	902		
EXPIRATION DATE	07/03/2006		

POINT	OBSERVED CONC.	ACTUAL CONC.	PERCENT DIFF.
1	0	0	0.00
2	255	250	0.50
3	505	500	0.50
4	908	902	0.60

Regression Output:

Constant		1.6234
Std Err of Y Est		1.9109
R Squared		1.0000
No. of Observations		4
Degrees of Freedom		2
X Coefficient(s)	1.0058	
Std Err of Coef.	0.0029	

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

PRESSURE MEASUREMENT DEVICE CALIBRATION FORM

Device Type	Magnehelic	Calibration Date	04/01/2003
Range	0 - 5" H2O	Calibrated by	K. Roberts
Manufacturer	Dwyer	Reference Device	Manometer
Serial No.	R890411RR3	Measurement Units	" H2O

Device Reading	Reference Device Reading	% Difference*
0.0	0.0	0.00
1	1	0.00
2.5	2.5	0.00
4.1	4	2.50
5.1	5	2.00

* % difference shall not exceed +/- 5%

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

PRESSURE MEASUREMENT DEVICE CALIBRATION FORM

Device Type	Magnehelic	Calibration Date	04/01/2003
Range	0 - 20" H2O	Calibrated by	K. Roberts
Manufacturer	Dwyer	Reference Device	Manometer
Serial No.	R9602025L4	Measurement Units	" H2O

Device Reading	Reference Device Reading	% Difference*
0	0	0.00
5.1	5	2.00
10	10	0.00
15.3	15	2.00
19.9	20	-0.50

* % difference shall not exceed +/- 5%

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

PRESSURE MEASUREMENT DEVICE CALIBRATION FORM

Device Type	Magnehelic	Calibration Date	04/01/2003
Range	0 - 20" H2O (M2)	Calibrated by	K. Roberts
Manufacturer	Dwyer	Reference Device	Manometer
Serial No.	R940629LPB12	Measurement Units	" H2O

Device Reading	Reference Device Reading	% Difference*
0	0	0.00
5	5	0.00
10.1	10	1.00
14.9	15	-0.67
20	20	0.00

* % difference shall not exceed +/- 5%

SOUTHERN ENVIRONMENTAL SCIENCES, INC.

PRESSURE MEASUREMENT DEVICE CALIBRATION FORM

Device Type	Magnehelic	Calibration Date	04/01/2003
Range	0 - 20" H2O (M3)	Calibrated by	K. Roberts
Manufacturer	Dwyer	Reference Device	Manometer
Serial No.	R940629LPD23	Measurement Units	" H2O

Device Reading	Reference Device Reading	% Difference*
0	0	0.00
5	5	0.00
10	10	0.00
15.2	15	1.33
19.6	20	-2.00

* % difference shall not exceed +/- 5%

SOUTHERN ENVIRONMENTAL SCIENCES, INC.
THERMOMETER CALIBRATIONS

Calibrated By/Date: T. Wilson 3/31/03

ALL TEMPERATURES ARE DEGREES RANKIN

ID No.	Type	Range	ICE BATH			TEPID WATER			BOILING WATER			HOT OIL		
			STD Therm	Temp	Deg or Diff	STD Therm	Temp	Deg or Diff	STD Therm	Temp	Deg or Diff	STD Therm	Temp	Deg or Diff
T1	PT	2000° F	495	496	0.2%	539	537	0.1%	672	670	0.2%	860	861	0.3%
T2	PT	2000° F	495	497	0.2%	539	537	0.1%	673	672	0.2%	870	872	0.3%
T3	PT	2000° F	495	497	0.2%	539	538	0.1%	673	671	0.3%	870	872	0.2%
T4	PT	2000° F	494	496	0.2%	539	538	0.1%	674	672	0.3%	863	864	0.2%
T5	PT	2000° F	494	496	0.2%	539	538	0.2%	672	670	0.2%	860	862	0.2%
T6	PT	2000° F	494	496	0.2%	539	537	0.3%	672	674	0.3%	852	854	0.2%
T7	PT	2000° F	495	497	0.2%	539	538	0.3%	673	671	0.2%	853	854	0.3%
T8	PT	2000° F	495	496	0.1%	539	537	0.2%	674	672	0.1%	864	865	0.2%
T9	PT	2000° F	495	497	0.1%	539	538	0.3%	673	671	0.1%	854	856	0.3%
Lab 14	BM	212° F	494	495	1°	536	535	1°	672	673	2°	-	-	-
15	BM	250° F	494	495	1°	536	535	1°	672	672	2°	-	-	-
16	BM	220° F	494	496	1°	536	536	2°	672	672	3°	-	-	-
SS110	BM	220° F	494	496	1°	540	539	2°	670	672	2°	-	-	-
SS300	PT	2000 °F	495	497	0.2%	540	538	0.1%	674	672	0.2%	850	852	0.2%
SS301	PT	2000° F	495	497	0.2%	540	538	0.2%	672	670	0.1%	856	858	0.2%
SS306	PT	2000° F	495	496	0.2%	540	538	0.2%	672	670	0.2%	856	858	0.2%
2.5'PA	PT	2000° F	495	496	0.2%	541	538	0.0%	673	672	0.2%	852	854	0.3%
2.5'PB	PT	2000° F	495	497	0.2%	541	538	0.0%	672	674	0.3%	856	858	0.3%
3'P	PT	2000° F	495	497	0.2%	541	539	0.1%	673	675	0.2%	858	860	0.3%
3'INC	PT	2000° F	494	496	0.1%	540	538	0.1%	676	678	0.2%	852	854	0.3%
5'PA	PT	2000° F	494	496	0.3%	540	539	0.0%	672	674	0.3%	856	858	0.2%
5'PB	PT	2000° F	495	497	0.3%	540	538	0.1%	674	672	0.3%	856	858	0.3%
5'PC	PT	2000° F	495	497	0.3%	540	538	0.2%	674	672	0.1%	856	858	0.3%
5'VP	PT	2000° F	495	497	0.2%	541	540	0.2%	676	678	0.2%	856	858	0.2%
5'INC	PT	2000° F	494	496	0.3%	542	540	0.1%	674	676	0.1%	850	852	0.3%
8'PA	PT	2000° F	494	496	0.3%	541	538	0.0%	676	678	0.2%	856	858	0.2%
8'PB	PT	2000° F	494	495	0.3%	541	539	0.1%	676	678	0.3%	856	858	0.2%
10'P	PT	2000° F	494	496	0.2%	541	539	0.0%	674	676	0.3%	854	856	0.2%

Quality Control Limits: Impinger Thermometers± 2°F, Bimetallic Thermometers(Bm)± 5°F,Pyrometers/Thermocouples(PT)± 1.5%

Southern Environmental Sciences, Inc.

1204 North Wheeler Street Plant City, Florida 33566 (813)752-5014

COMBUSTIBLE GAS DETECTOR CALIBRATION

INSTRUMENT

Manufacturer	Gas Tech
Model No.	GT105
Serial No.	9708311

CALIBRATION GAS DATA

	Zero	Span
Gas Type	Zero Air	methane
Concentration (PPM)	0	25,370
Supplier	Airgas	Air Products

CALIBRATION

	Observed Conc. (PPM)	Actual Conc. (PPM)	Percent Diff.
ZERO	6	0	0
SPAN	50% LEL	50% LEL	0
Response Time	6		
Calibration Date	8/26/03	Signature: Ken Rahal	

Note: For methane 10,000 PPM = 20% LEL

Southern Environmental Sciences, Inc.

1204 North Wheeler Street Plant City, Florida 33566 (813)752-5014

COMBUSTIBLE GAS DETECTOR CALIBRATION

INSTRUMENT

Manufacturer	Gastech
Model No.	GT.105
Serial No.	9709402

CALIBRATION GAS DATA

	Zero	Span
Gas Type	zero Air	Methane
Concentration (PPM)	0	25,370
Supplier	AirGas	Air Products

CALIBRATION

	Observed Conc. (PPM)	Actual Conc. (PPM)	Percent Diff.
ZERO	0	0	0
SPAN	50% LEL	50% LEL	0
Response Time	5.5		
Calibration Date	8/26/03	Signature: Ken Roberts	

Note: For methane 10,000 PPM = 20% LEL

Southern Environmental Sciences, Inc.
1204 North Wheeler Street Plant City, Florida 33566 (813) 752-5014

TURBINE METER CALIBRATION

Turbine Meter No	94-54464
Pipot Cp	0.99
Calibration Date	04/25/2003
Serial No.	B. Nelson

		Run 1	Run 2	Run 3
Delta P Readings ("H2O)	P1	0.03	0.03	0.03
	P2	0.03	0.03	0.02
	P3	0.03	0.03	0.03
	P4	0.03	0.03	0.03
	P5	0.03	0.02	0.03
	P6	0.03	0.03	0.03
	P7	0.02	0.02	0.02
	P8	0.02	0.03	0.03
Avg. Sq. Rt of Delta P ("H2O)		0.1653	0.1653	0.1653
Temp. Readings (Deg F)	T1	74	75	74
	T2	74	75	75
	T3	74	75	75
	T4	74	75	75
	T5	74	75	75
	T6	74	75	76
	T7	74	75	76
	T8	75	75	75
Avg. Temperature		74.125	75.0	75.1
Static Pressure ("H2O)		0.68	0.65	0.64
Barometric Pressure ("Hg)		30.02	30.02	30.02
Moisture (%)		2.0	2.0	2.0
Total Pressure ("Hg)		30.07	30.07	30.07
Molecular Weight		28.54	28.54	28.54
Duct Diameter (inches)		12	12	12
Duct Area (sq. ft)		0.7854	0.7854	0.7854
Duct Velocity (ft/min)		11.04	11.05	11.05
Reference Flowrate (ACFM)		520.4	520.9	520.9
Test Meter Flowrate (ACFM)		530	530	530
Difference (%)		1.8	1.7	1.7

Average Difference (%)	1.75
Tolerance (%)	5