Technical Evaluation
and
Preliminary Determination

Belcher Oil Company-Port Canaveral
Brevard County
Cape Canaveral, Florida

Permit Numbers:
AC 05-090952
AC 05-092822
AC 05-094507

Florida Department of Environmental Regulation
Bureau of Air Quality Management
Central Air Permitting

State of Florida
Department of Environmental Regulation
Notice of Proposed Agency Action
on Permit Applications

The Department of Environmental Regulation gives notice of its intent to issue permits to the Belcher Oil Company - Port Canaveral to modify five petroleum storage tanks and the south loading rack-vapor recovery system and to decommission one petroleum storage tank at its existing bulk gasoline and petroleum storage/transfer facility in Cape Canaveral, Brevard County, Florida. A determination of best available control technology (BACT) was not required.

Persons whose substantial interests are affected by the Department's proposed permitting decision may petition for an administrative proceeding (hearing) in accordance with Section 120.57, Florida Statutes. The petition must conform to the requirements of Chapters 17-103 and 28-5, Florida Administrative Code, and must be filed (received) in the Office of General Counsel of the Department at 2600 Blair Stone Road, Twin Towers Office Building, Tallahassee, Florida 32301, within fourteen (14) days of publication of this notice. Failure to file a request for hearing within this time period shall constitutes a waiver of any right such person may have to request an administrative determination (hearing) under Section 120.57, Florida Statutes.

If a petition is filed, the administrative hearing process is designed to formulate agency action. Accordingly, the Department's final action may be different from the position taken by it in this preliminary statement. Therefore, persons who may not object to the proposed agency action may wish to intervene in the proceeding. A petition for intervention must be filed pursuant to Model Rule 28-5.207 at least five (5) days before the final hearing and be filed with the hearing officer if one has been assigned at the Division of Administrative Hearings, Department of Administration, 2009, Apalachee Parkway, Tallahassee, Florida 32301. If no hearing officer has been assigned, the petition is to be filed with the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32301. Failure to petition to intervene within the allowed time frame constitutes a waiver of any right such person has to request a hearing under Section 120.57, Florida Statutes.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Dept. of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803

Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, Florida 32301

Any person may send written comments on the proposed action to Mr. Bill Thomas at the department's Tallahassee address. All comments mailed within 30 days of the publication of this notice will be considered in the department's final determination.

RULES OF THE ADMINISTRATIVE COMMISSION
MODEL RULES OF PROCEDURE
CHAPTER 28-5
DECISIONS DETERMINING SUBSTANTIAL INTERESTS

28-5.15 Requests for Formal and Informal Proceedings

(1) Requests for proceedings shall be made by petition to the agency involved. Each petition shall be printed typewritten or otherwise duplicated in legible form on white paper of standard legal size. Unless printed, the impression shall be on one side of the paper only and lines shall be double spaced and indented.

(2) All petitions filed under these rules should contain:

(a) The name and address of each agency affected and each agency's file or identification number, if known;

(b) The name and address of the petitioner or petitioners;

(c) All disputed issues of material fact. If there are none, the petition must so indicate;

(d) A concise statement of the ultimate facts alleged, and the rules, regulations and constitutional provisions which entitle the petitioner to relief;

(e) A statement summarizing any informal action taken to resolve the issues, and the results of that action;

(f) A demand for the relief to which the petitioner deems himself entitled; and

(g) Such other information which the petitioner contends is material.

I. PROJECT DESCRIPTION

A. Applicant
Belcher Oil Company
P. O. Box 525500
Miami, Florida 33152

B. Project and Location

The applicant proposes to increase the existing vapor recovery system's allowable VOC (volatile organic compounds) emission rate at the South Loading Rack to 35 milligrams of total organic compounds per liter of gasoline loaded, to decommission one existing gasoline storage tank No. 8 (facility identification number), to convert/renovate the existing gasoline storage tank No. 7 to a fixed roof tank for accommodating diesel fuel, and to increase the annual gasoline throughput of the existing gasoline storage tanks Nos. 9, 15, 17 and 18, without increasing the annual permitted allowable gasoline dispensed of 3,600,000 barrels at the South Loading Rack. The gasoline throughput of the storage tanks Nos. 7 and 8 will be allotted to the storage tanks Nos. 9, 15, 17 and 18. The following Table 1 will display the applicant's projected annual throughputs of gasoline:

Table 1

Gasoline Storage Tank ID	Storage Capacity (Bbls)	Annual Throughput (Bbls/yr) Current	Proposed
7	55,000	521,053	-0-
8	35,000	331,579	-0-
9	35,000	331,579	434,491
15	55,000	521,053	682,797
17	100,000	947,368	1,241,356
18	100,000	947,368	1,241,356
	Total:	3,600,000	3,600,000

Table 2 will display the applicants projected annual throughput of diesel fuel in the storage tank No. 7:

Table 2

Diesel Fuel Storage Tank ID	Storage Capacity (Bbls)	Annual Throughput (Bbls/yr) Current	Proposed
7	55,000	-0-	811,000

The existing bulk gasoline and petroleum storage/transfer terminal is located at No. 10 Tanker Turn Road, Cape Canaveral, Florida, with UTM coordinates of Zone 17-589.9 km East and 3142.0 km North. The terminal is also located in an area designated attainment for all pollutants.

C. Process and Controls

The process of handling petroleum products is not changing at the existing facility. The increase in annual throughput of gasoline in the existing petroleum storage tanks (PST) Nos. 9, 15, 17 and 18, will increase the annual potential VOC emissions per source. There will be an increase in VOC potential emissions after renovating PST No. 7 with a fixed roof and switching from gasoline to diesel fuel storage. The increase in the allowable VOC emission rate of the South Loading Rack's vapor recovery system (SLR-VRS) will increase the hourly and annual potential VOC emissions. The following Table 3 will display the current and projected potential VOC emissions from each source:

Table 3

Source Identification	Potential VOC Emissions (lbs/yr) Current	Projected
PST		
7	1,534	2,180
8	1,228	-0-
9	1,228	1,238
15	42,537	42,591
17	2,189	2,205
18	2,189	2,205
SLR-VRS:	30,167	44,465
Total:	81,072 40.5 TPY	94,884 47.4 TPY

Note:
- The maximum annual gasoline permitted to be dispensed from the South Loading Rack is 3,600,000 barrels.
- The PST VOC potential emissions are the sum of the standing storage and withdrawl losses.

Existing PST Nos. 9, 17 and 18, have a liquid mounted resilient primary seal with a rim mounted secondary seal. Existing PST No. 15 has a vapor mounted resilient primary seal with a rim mounted secondary seal.

II. RULE APPLICABILITY

The pollutants emitted from the affected PST Nos. 7, 9, 15, 17 and 18, and the SLR-VRS, are classified as volatile organic compounds (VOC) by definition in accordance with FAC Rule 17-2.100(179). Table 4, on the following page, exhibits the potential VOC emissions from each source and the total potential VOC emissions from the facility.

Since the existing facility is located in an area designated attainment for all criteria pollutants, review shall be in accordance with FAC Rule 17-2.500, Prevention of Significant Deterioration (PSD).

PST No. 8 is to be decommissioned, PST No. 7 is to be renovated to accommodate diesel fuel and their annual permitted gasoline throughput will be allotted to the affected PST Nos. 9, 15, 17 and 18. By increasing the permitted gasoline throughput, there will be an increase in actual VOC emissions per affected source, which is a modification in accordance with FAC Rule 17-2.100(105).

The applicant requested that the VOC emission rate at the SLR be increased to an allowable limit of 35 milligrams of total organic compounds per liter of gasoline loaded, which is the same rate as that contained in the NSPS, 40 CFR 60, Subpart XX, which was adopted by reference according to FAC Rule 17-2.660. This increase in the VOC emission rate will increase the actual VOC emissions at the SLR, which is a modification by definition. A vapor recovery system (VRS) has been installed to maintain compliance with the allowable emission rate.

The existing terminal is a minor facility in accordance with FAC Rule 17-2.100 (103). Since the proposed action is a minor modification (see Table 3) to a minor facility, new source review requirements are not required in accordance with FAC Rule 17-2.500(2)(d)3.

PST Nos. 17 and 18 are NSPS (new source performance standards) sources and subject to 40 CFR 60, Subpart K, which was adopted by reference according to FAC Rule 17-2.660.

PST Nos. 7, 9 and 15 are not NSPS sources. Since there are no specific emission limiting standards contained in FAC Rule 17-2.600 for these type of sources, the VOC emission limits for PST Nos. 7, 9 and 15 will be permitted in accordance with FAC Rule 17-2.620(1) and (2), General Pollutant Emission Limiting Standards.

Compliance with the VOC emission rate limit set for the VRS servicing the gasoline dispensing connections at the SLR shall be in accordance with FAC Rule 17-2.700(6)(c)2.b.(i).

Table 4

Source		Potential VOC Emissions (lbs/yr) Breathing/ Standing	Working/ Withdrawal	Loading Racks	Total
PST[1]	#1	1,620	781		2,401
	#2	57	4		61
	#3	906	121		1,027
	#4[2]	--	--		--
	#5[2]	--	--		--
	#6[2]	--	--		--
	#7	1,226	954		2,180
	#8	0	0		0
	#9	1,195	43		1,238
	#10[3]	2,486	232		2,718
	#11[3]	2,486	232		2,718
	#12	235	88		323
	#13	235	88		323
	#14[2]	--	--		--
	#15	42,537	54		42,591
	#17	2,136	69		2,205
	#18	2,136	69		2,205
NLR[4]: Dispensers	2 Diesel			373.0	
	1 No. 6 Fuel Oil			2.5	708.8
	1 Jet Kerosene			61.8	
	1 AC-20/RC-70			271.5	
SLR-VRS[5]: Dispensers	4 Gasoline			44,159.1	
	2 Diesel			248.1	44,465.2
	1 Jet Kerosene			15.4	
	1 Ethanol			42.6	
Facility Totals lbs/yr		57,255.0	2,735.0	45,174.0	105,164.0
TPY		28.6	1.4	22.6	52.6

1. There is no PST No. 16; PST No. 8 has been decommissioned.
2. Emissions were not calculated for AC-20 asphalt due to extremely low vapor pressure.
3. RC-70 product: 70% asphalt, 30% naptha; emissions were calculated using product characteristics of naptha.
4. Product throughput in barrels/yr:

Diesel	487,000
No. 6 Fuel Oil	366,000
Jet Kerosene	67,200
RC-70	12,000

   Assume: 34,000 gallons of petroleum product can be loaded per dispenser per hour.
5. Product throughput in barrels/yr:

Gasoline	3,600,000
Diesel	324,000
Jet Kerosene	16,800
Ethanol	71,429

   Assume: 1) 34,000 gallons of petroleum product can be loaded per dispenser per hour; and,
   2) Efficiency of the VRS is 98% removal of pollutant (vendor specifications).

Compliance with the VOC potential emissions projected for all of the other sources, including the non-gasoline dispensers at the SLR, shall be periodic visual inspections of the sources and their associated equipment to assure proper operation and maintenance in accordance with FAC Rule 17-2.620(1). Also, no objectionable odors shall be allowed off of the terminal property according to FAC Rule 17-2.620(2).

III. SUMMARY OF EMISSIONS AND AIR QUALITY ANALYSIS

A. Emission Limitations

The pollutants regulated from the affected source are volatile organic compounds (VOC). Table 5 will reflect the VOC allowable emission rate applicable to the SLR-VRS:

Table 5

Source	Allowable VOC Emission Rate
SLR-VRS	35 milligrams total organic compounds per liter of gasoline loaded

Note: The SLR consists of two sections, "A" and "B", which contain the following dispensing connections, type of products dispensed, and projected annual emissions:

SLR-A	SLR-B	Projected Annual VOC Emissions
2 Gasoline	2 Gasoline	44,159.1 lbs/yr (total)
1 Diesel	1 Diesel	248.1 lbs/yr (total)
1 Jet Kerosene		15.4 lbs/yr
	1 Ethanol	42.6 lbs/yr

The permitted allowable VOC emission rate is in compliance with all applicable requirements of FAC Chapter 17-2.

All unexpected VOC emissions that will occur by handling, transferring, and storage of gasoline, ethanol, and petroleum products, shall be properly attended to by the applicant, i.e., from correcting the problem and removal of contaminated material to final disposal. Also, DER's St. Johns River District office shall be promptly notified.

B. Air Quality Analysis

An air quality analysis was not required.

IV. CONCLUSIONS

The VOC emission rate proposed by the applicant has been determined to be in compliance with all applicable requirements of FAC Chapter 17-2.

The VOC emissions projected from this existing bulk gasoline and petroleum storage/transfer terminal are area-wide (facility) and a point-source (VRS at the SLR when loading gasoline). Compliance verification of the area-wide (facility) VOC emissions shall be by periodic visual inspections by the DER's St. Johns River District office. These visual inspections will either find that the equipment is being properly operated and maintained or that corrective action will be required. All corrective action shall be concurred with the DER's St. Johns River District office.

A compliance test shall be required of the VRS (point-source) at the SLR while loading gasoline product from the four gasoline dispensing connections.

Besides visual inspections and the point-source compliance test to reasonably assure minimal VOC emissions, there will not be any objectionable odors allowed on off-plant property.

The facility's total VOC projected potential emissions of 52.6 TPY, which reflects this project's increase of 6.9 TPY of VOC, should not cause any violation of Florida's ambient air quality standards.

The General and Specific Conditions listed in the proposed permits (attached) will assure compliance with all applicable requirements of FAC Chapter 17-2.

AC 05-090952

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE: Belcher Oil Company
Port Canaveral Bulk Gasoline Terminal
P. O. Box 525500
Miami, Florida 33152

I.D. Number:
Permit/Certification Number: AC 05-090952
Date of Issue:
Expiration Date: June 1, 1985
County: Brevard
Latitude/Longitude: 28° 24' 20" N/80° 36' 09" W
Section/Township/Range:
Project: Modification to the existing gasoline storage tanks Nos. 9, 15, 17 and 18

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the modification to the above referenced sources to allow an increase in their gasoline throughput due to the decommissioning of the existing gasoline storage tank No. 8 and the renovation/conversion of the existing gasoline storage tank No. 7 at the applicant's existing bulk gasoline and petroleum storage/transfer terminal located at No. 10 Tanker Turn Road, Cape Canaveral, Florida. The UTM coordinates are Zone 17-589.9 km East and 3142.0 km North.

The modification shall be in accordance with the permit application and plans, documents, amendments, and drawings except as otherwise noted on page 4 of the "Specific Conditions."

Attachments are as follows:

1. Construction permit No. AC 05-57477 and its attachments, modifications and amendments.
2. Construction permit No. AC 05-57478 and its attachments, modifications and amendments.
3. Construction permit No. AC 05-57479 and its attachments, modifications and amendments.
4. Michael K. Gleman's letter with attachments dated April 26, 1984.
5. Albin W. Smith's letter with attachments dated June 21, 1984.
6. Steve Smallwood's letter dated August 8, 1984.
7. Michael K. Gleman's letter with DER Form 17-1.202 attached dated September 19, 1984.
8. Michael K. Gleman's letter with attachment dated September 21, 1984.
9. "Waiver of 90 day time limit" dated October 2, 1984, and signed by Albin W. Smith.
10. Michael K. Gleman's letter with attachments dated October 18, 1984.

PERMITTEE: Belcher Oil Company
Port Canaveral Bulk Gasoline Terminal
P. O. Box 525500
Miami, Florida 33152

I.D. Number:
Permit/Certification Number: AC 05-090952
Date of Issue:
Expiration Date: June 1, 1985

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

   a. Having access to and copying any records that must be kept under the conditions of the permit;

   b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

   c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

   Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

   a. a description of and cause of non-compliance; and

b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
(x) Compliance with New Source Performance Standards: PST Nos. 17 and 18

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

PERMITTEE: Belcher Oil Company
Port Canaveral Bulk Gasoline Terminal
P. O. Box 525500
Miami, Florida 33152

I.D. Number:
Permit/Certification Number: AC 05-090952
Date of Issue:
Expiration Date: June 1, 1985

SPECIFIC CONDITIONS:

1. The modification should reasonably conform to the application, plans, documents, and amendments submitted.

2. The applicant should report any delays in the modification and completion of to the DER's St. Johns River District office.

3. Annual hours of operation will be 8760.

4. Objectionable odors shall not be allowed on off-plant property.

5. If not existing, a containment dike/berm shall be erected around each storage tank, Nos. 9, 15, 17 and 18, to contain spills, leaks, etc., to prevent ground-water contamination, and to aid in the clean-up of spills, leaks, etc. and prevent excess odors that could occur from the vaporization of the volatile organic compounds (VOC). If any spills, leaks, etc. occur, the DER's St. Johns River District office shall be promptly notified.

6. Expected gasoline throughput of the petroleum storage tanks (PST), Nos. 9, 15, 17 and 18, and their projected potential VOC emissions are:

Source		Dimensions feet	Capacity barrels	Product Stored	Throughput bbls/yr	VOC Emissions lbs/yr
PST	#9	80Ø X 40	35,000	Gasoline	434,491	1,238
	#15	100Ø X 40	55,000	Gasoline	682,797	42,591
	#17	143Ø X 42	100,000	Gasoline	1,241,356	2,205
	#18	143Ø X 42	100,000	Gasoline	1,241,356	2,205
				Total	3,600,000	48,239

Note: Ø represents the diameter x Height.

7. Since the VOC emissions from the sources referenced in #6 are considered to be area-wide (facility) emissions, compliance verification shall be by periodic visual inspections of the equipment used to store/transfer the petroleum product. The visual inspections shall be conducted by the DER's St. Johns River District office. Any corrective action shall be concurred with the District office.

8. Annual operating reports shall be submitted to the DER's St. Johns River District office or its designee and shall be due on January 14 of each calendar year. This report shall contain records of the gasoline throughput.

9. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to the DER's St. Johns River District office prior to 90 days of the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or issuance of an operating permit.

Issued this _____ day of _____, 19__

_____

_____Attachments

ATTACHMENT 1

ATTACHMENT 1

Available Upon Request.

ATTACHMENT 2

ATTACHMENT 2

Available Upon Request.

ATTACHMENT 3

ATTACHMENT 3

Available Upon Request.

ATTACHMENT 4

re What stack flow at the meeting?

GLEMAN ENGINEERING COMPANY
324 DATURA STREET
POST OFFICE BOX 3384
WEST PALM BEACH, FLORIDA 33402
TELEPHONE (305) 655-0506

April 26, 1984

State of Florida
Department of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Attn: Mr. Roger Caldwell

Re: Brevard County - AP
Belcher Oil Company
VRU Testing Program
Our: 84-101-1

Gentlemen:

Thank you for meeting with us on April 19, 1984 to review the VRU Test Results for the referenced facility and to discuss the operation conditions for the anticipated permit in general terms. We regret any misunderstanding regarding the original purpose of this meeting.

As discussed, we understand the DER will consider issuing an Operation Permit that will allow for the following operating conditions:

1. An allowable emission rate of 35 mg/l conforming to current regulatory requirements. Enclosed are calculations showing total emissions will remain under 100 T/Yr for this 35 mg/l rate.

2. An allowable maximum gasoline loading flow rate of 25,850 GPH average over any 24-hour period. This flow being equal to the test flow rate of 19,387 GPH divided by the 75% of maximum requirement outlined in EPA test procedures.

3. An allowable "peak" gasoline flow rate of 68,000 GPH provided the 25,850 GPH average is not exceeded. This 68,000 GPH flow rate corresponds to the flow rate originally permitted for this VRU.

   Additionally, this 68,000 GPH flow rate was actually tested between 8:40 A.M. and 8:55 A.M. the morning of the test. Total flow for this 15-minute interval was 17,350 gallons with an average emission rate of 1.5 mg/l. Extrapolating this 15-minute interval to an hour yields a flow of 69,400 GPH.

   Data for this test interval is shown in the truck data sheets and computer print-out summary in the test report. Calculations verifying these conditions will follow within several days.

Because of the restrictive nature some of these questions could have on Belcher Oil Company's business at this facility, we trust the DER will give every consideration in reviewing these items.

Again, we appreciate your cooperation and efforts to resolve these questions. We are ready to answer any questions or review these items via telephone or in person in order to reach a successful conclusion. Please feel free to call if you have any questions.

Very truly yours,

GLEMAN ENGINEERING COMPANY

Michael K. Gleman, P.E.
President

MKG/ms

cc: Mr. Troy Dalton - Belcher Oil

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB 84-101-1
SHEET NO 1 OF 2
CALCULATED BY MKG DATE APR '84
CHECKED BY DATE
SCALE PORT CANAVERAL - BELCHER OI

EMISSION CALCULATIONS

SHOWING 35 mg/l VOC EMISSION FROM VRU RESULTS IN LESS THAN 100 T/YR TOTAL EMISSIONS

1. CURRENT PERMITTED TANK EMISSIONS - GASOLINE VOC: 144,041 lbs/YR = 72.04 T/YR

2. CURRENT PERMITTED VRU EMISSIONS: 1.1.9 from limit = 15.06 T/YR

CURRENT PERMITTED TOTAL: 87.10

3. NEW VRU EMISSIONS FOR 35 mg/l.

AND 65,000 GPH = MAXIMUM FLOW RATE:

A. TOTAL # OF ACTUAL PUMPING HRS/YR =

$$\left[3.6 \times 10^6 \text{ BBLS} \times 42 \text{ GAL./BLL}\right] \div 68{,}000 \text{ GPH} = 2224 \text{ HRS/YR}$$

B. ALLOWABLE EMISSIONS AT 80 mg/l. = L_L

$$L_L = \left[80 \text{ mg/l}\right]\left[3.785 \text{ l/gal.}\right]\left[\frac{\text{lb}}{454{,}592 \text{ mg}}\right]\left[65000 \text{ GPH}\right]$$

$$= 45.3 \text{ lbs/hr}$$

C. ∴ ALLOWABLE EMISSIONS AT 35 mg/l =

$$\left[35/80\right]\left[45.3\right] = 19.82 \text{ lbs/hr.}$$

D. TOTAL ANNUAL EMISSIONS AT 35 mg/l:

19.82 lbs/hr × 2224 = 22.04 T/YR.

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB C. 101-1
SHEET NO 2 OF 2
CALCULATED BY MKG DATE APR '84
CHECKED BY _____ DATE _____
SCALE PORT CANAVERAL - BELCHER OIL

3. CONT.

E. TOTAL ADDITIONAL VRU EMISSIONS FOR 35 mg/l RATE:

22.04	NEW
14.93	EXIST'G - PERMITTED
7.11	ADDITIONAL T/YR

4. SUMMARY:

A.	CURRENT PERMITTED TOTAL:	87.10 T/YR
B.	ADDITIONAL EMISSIONS FOR 35 mg/l RATE:	7.11 T/YR
	NEW TOTAL	94.21 T/YR

ATTACHMENT 5

Best Available Copy

R.C.   AC 05-090952 C'm C

Belcher

DER

JUL 26 1984

BAQM

ALBIN W. SMITH
PRESIDENT

June 21, 1984

State of Florida
Department of Environmental Regulation
St. Johns River District
3319 Maguire Boulevard
Orlando, Florida 32803

RECEIVED JUL 1984 Saint Johns River District

Attention: Mr. Roger Caldwell

Re: Belcher Oil Company Terminal
Port Canaveral, Florida

Gentlemen:

This letter is a request for modifications to certain existing air pollution operation permits for the referenced facility. These modifications slightly increase emissions from Tanks no. 9, 17 and 18 and significantly reduce emissions from Tank no. 15. The affected permits are as follows:

AC-05-57476
AC-05-57477
AC-05-57478
AC-05-57479

The enclosed explanations, calculations and supporting data for this request were prepared by our consultant, Gleman Engineering Company.

Please feel free to contact us or our consultant should you have any questions concerning this request.

Sincerely,

BELCHER OIL COMPANY

Albin W. Smith

Albin W. Smith
President

AWS:bc
Attachment

GLEMAN ENGINEERING COMPANY
324 DATURA STREET
POST OFFICE BOX 3384
WEST PALM BEACH, FLORIDA 33402
TELEPHONE (305) 655-0506

June 20, 1984

State of Florida
Department of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Attention: Mr. Roger Caldwell

Re: Brevard County - AP
Belcher Oil Company
Gasoline Loading Racks
Your: A005-85950 (SLR "A" & "B")
A005-57476 (Tank 7)
A005-57477 (Tanks 8 & 9)
A005-57478 (Tank 15)
A005-57479 (Tanks 17 & 18)
Our: 84-101-1

Gentlemen:

This letter responds to your June 5, 1984 request for additional information as follows:

1. The total yearly facility VOC emissions figure of 99.71 T/yr includes all sources owned by Belcher Oil Company at this facility except the Asphalt Heaters that contribute an additional .025 T/yr. However, all previous emission totals contained an erroneous emission rate of 68.15 T/yr (136,301 lbs/yr) for Tank #15. This excessively high emission rate was a result of using incorrect seal factors for this tank during permitting in 1982. New calculations are enclosed that show an actual emission rate of 21.30 T/yr.

   Additionally, since Tanks #7 & 8 are not being operated or permitted at this time, we have adjusted throughputs and corresponding emissions for the remaining tanks proportionately to maintain the current permitted throughput for the VRU at 3,600,000 BBLS/Yr.

   These corrections and adjustments result in a new emission total for the entire facility of 51.46 T/yr. Total permitted gasoline throughputs will remain unchanged.

   Because of these adjustments, we feel modifications to the existing permits for the affected tanks are warranted at this time. Calculations and supporting data are enclosed.

- continued -

2. See Attachment "A" enclosed herewith for a list of all sources and related VOC emissions for this facility.

We trust this information is sufficient to allow issuance of an Operating Permit for the gasoline loading racks and VRU and for modifications to existing permits for the referenced tankage permits. Please feel free to call should you require additional information.

Very truly yours,

GLEMAN ENGINEERING COMPANY

Michael K. Gleman, P.E.
President

MKG/lm

cc: Mr. Tommy Green - Belcher Oil

Enc.

ATTACHMENT "A" - Page 1

Belcher Oil Company

Port Canaveral Terminal

Total Product Emissions

Source	Losses lbs/yr			
	Breathing/ Standing	Working/ Withdrawal	Loading	Total
Tanks 9,15,17,18 and SLR "A" & "B"	48,004	235	44,343	92,582 (46.29)
Tanks 1-6/10-14 and North Loading Rack	8,025	1,546	709	10,280 (5.14)
Asphalt Heaters	-----	-----	-----	50 (.025)
Totals - lbs/yr - (T/yr)	56,029 (28.02)	1,781 (.89)	45,052 (22.53)	102,912 (51.46)

NOTE:

1. Tanks 7 & 8 not used and therefore not listed.
2. Tank 15 emissions reduced - see calculations.
3. Loading losses for SLR "A" & "B" increased to reflect 35.0 mg/l discharge rate - see AO 05-85950. Also includes loading losses of 248 lbs/yr (No. 2 Oil) and 15 lbs/yr (Jet A) previously permitted.

ATTACHMENT "A" - Page 2

Belcher Oil Company

Pt. Canaveral Terminal

Tank and Loading Rack Information

Tank No.	Type	Capacity (bbl)	Product	Dimensions (ft)
#1	Cone	80,000	No. 2 Oil	120Ø X 40
#2	Cone	55,000	No. 6 Oil	100Ø X 40
#3	Cone	35,000	Jet A	80Ø X 40
#4	Cone	20,000	AC-20	60Ø X 40
#5	Cone	1,200	AC-20	19Ø X 24
#6	Cone	20,000	AC-20	60Ø X 40
#7	Internal Float	55,000	Not Used	100Ø X 40
#8	Internal Float	35,000	Not Used	80Ø X 40
#9	Internal Float	35,000	Gasoline	80Ø X 40
#10	Cone	3,000	RC-70	30Ø X 24
#11	Cone	3,000	RC-70	30Ø X 24
#12	Cone	9,000	No. 2 Oil	40Ø X 40
#13	Cone	9,000	No. 2 Oil	40Ø X 40
#14	Cone	1,500	AC-20	21Ø X 24
#15	Ext. Float	55,000	Gasoline	100Ø X 40
#17	Internal Float	100,000	Gasoline	143Ø X 42
#18	Internal Float	100,000	Gasoline	143Ø X 42

Loading Rack Positions:

South	North
SLR "A"	2 Diesel
SLR "B"	1 Bunker
	1 Asphalt
	1 Jet Kerosene

Notes: (1) No Tank 16

ATTACHMENT "A" - Page 3

Belcher Oil Company

Cape Canaveral Terminal Product Emissions

Breathing and Working Losses

(Tanks 1-6 and 10-14)

Tank	Product	Capacity (bbls)	Throughout (bbls/yr).	Losses (lbs/yr)		
				Breathing	Working	Tota
1	No. 2	80,000	662,040	1620	781	2401
2	No. 6	55,000	366,000	57	4	61
3	Kerosene	35,000	84,000	906	121	1027
4	*AC-20	20,000	86,183	-	-	-
5	*AC-20	1,200	5,171	-	-	-
6	*AC-20	20,000	86,183	-	-	-
10	RC-70	3,000	6,000	2486	232	2718
11	RC-70	3,000	6,000	2486	232	2718
12	No. 2	9,000	74,480	235	88	323
13	No. 2	9,000	74,480	235	88	323
14	*AC-20	1,500	6,463	-	-	-
				8,025	1,546	9,57

NOTE:
Emissions not calculated for AC-20 asphalt product due to extremely low vapo pressure.

Emissions on this page currently permitted - see AC 05-62236

Gasoline Storage Tank Information
-Summary of Standing/Withdrawal Emissions-

Tank	Type	Capacity (bbls)	Dimensions (ft)	Throughput (bbls/yr)	Losses (lbs/yr)		
					Standing	Withdrawal	Total
7	int float	55,000*	100Ø X 40	-0- (not used)	-0- (not used)	-0- (not used)	-0-
8	int float	35,000*	80Ø X 40	-0- (not used)	-0- (not used)	-0- (not used)	-0-
9	int float	35,000	80Ø X 40	434,491	1,195	43	1,238
15	ext float	55,000	100Ø X 40	682,797	42,537	54	42,591
17	int float	100,000	143Ø X 42	1,241,356	2,136	69	2,205
18	int float	100,000	143Ø X 42	1,241,356	2,136	69	2,205
-	-	290,000*	-	3,600,000	48,004	235	48,239

Notes: (1) Tanks 7 and 8 not intended for usage or permitting at this time.
(2) Tank 15 emissions reduced - see calculations.
(3) Throughputs for remaining tanks (9-15-17-18) proportionately increased to maintain total throughput of 3,600,000 BBLS/YR.
(*) Storage capacities for Tanks 7 & 8 not included in total capacity for facility.

ATTACHMENT "A" - Page 5

Belcher Oil Company

Cape Canaveral Terminal Product Emissions

North Loading Rack - Loading Losses

Product	Emissions		Potential Emissions	
	Maximum Hourly (lbs/hr)	Actual Annual (T/yr)	Maximum Hourly (lbs/hr)	Potential Annual (T/yr)
No. 2 Oil	1.24	0.19	1.24	0.19
No. 6 Oil	0.005	0.03	0.005	0.03
Jet Kerosene	0.74	0.001	0.74	0.001
RC-70	18.30	0.14	18.30	0.14
	20.3	0.36	20.3	0.36

ATTACHMENT "A" - Page 6

Belcher Oil Company

Cape Canaveral Terminal

Product Emissions Summary

(Tanks 1-6 and 10-14 and North Loading Rack)

Losses	(lbs/yr)
Breathing	8,025
Working	1,546
Loading	709
Total Hydrocarbon Losses =	10,280 lbs/yr
	5.14 T/yr

NOTE:
These emissions currently permitted - see AC 05-62236

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB [illegible]
SHEET NO. 1 OF 4
CALCULATED BY MG DATE JUNE '84
CHECKED BY _____ DATE _____
SCALE BELCHER OIL - PORT CANAVERAL

EMISSION CALCULATIONS
STORAGE TANKS 9 - 15 - 17 - 18

[1] BACKGROUND DATA:

	CURRENT PERMITTED THROUGHPUT		NEW THROUGHPUT	
TANK #7	521,053	BBLS/YR.	- 0 -	
8	331,579		- 0 -	
9	331,579		434,491	BBLS/YR.
15	521,053		682,797	
17	947,368		1,241,356	
18	947,368		1,241,356	
TOTAL	3,600,000		3,600,000	

	CURRENT PERMITTED EMISSIONS		NEW EMISSIONS	
TANK #7	1,534	lbs/Yr.	- 0 -	
8	1,228		- 0 -	
9	1,228		1,238	lbs/Yr.
15	136,301		42,591	
17	2,189		2,205	
18	2,189		2,205	
	144,415		48,239	

[2] CLIMATOLOGICAL DATA:

T_{Avg} = 79° F MAX

T_{Avg} = 68° F MIN.

T_{Avg} = 73° F MEAN

V = 8.1 MPH

SOURCE: NOAA FOR PATRICK AFB (COCOA BEACH).

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB

SHEET NO. 2 OF 4

CALCULATED BY MKG DATE June '81

CHECKED BY DATE

SCALE BELCHER OIL - PORT CANAVERAL

[3] STANDING STORAGE LOSSES:

$$L_s = K_s V^N P^* D M_v K_c E_F \quad (lbs/Yr)$$

K_s = SEAL FACTOR
V = AVG. WIND VELOCITY
N = SEAL RELATED WIND SPEED EXPONENT
P^* = VAPOR PRESSURE FUNCTION
D = TANK DIAMETER
M_v = VAPOR MOLECULAR WEIGHT
K_c = PRODUCT FACTOR
E_F = SECONDARY SEAL FACTOR
P_A = ATMOS. PRESSURE (PSIA)

TANK #9: INTERNAL FLOAT - GASOLINE

$$L_s = (0.7)(8.1)^{0.4}(0.14)(80)(66)(1)(1)$$

$$= 1,195 \text{ lbs/yr} = 0.598 \text{ T/Yr.} - 0.14 \text{ lbs/hr.}$$

TANK #15: EXTERNAL FLOATING ROOF - GASOLINE

A. USING INCORRECT SEAL FACTORS OF $K_s = 1.2$ + $N = 2.3$ FOR VAPOR MOUNTED PRIMARY SEAL

$$L_s = (1.2)(8.1)^{2.3}(0.14)(100)(66)(1)(1)$$

$$= 136,260 \text{ lbs/Yr} - 68.13 \text{ T/Yr} - 15.6 \text{ lbs/hr.}$$

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB

CALCULATED BY MKG DATE [illegible] '84

CHECKED BY DATE

SCALE BELCHER OIL - PORT CANAVERAL

[3] STANDING STORAGE LOSSES: (cont.)

TANK #15: (cont.)

B. USING CORRECT SEAL FACTORS OF $K_S = 0.2$ + $N = 2.6$ FOR VAPOR MOUNTED RESILIENT SEAL w/ SECONDARY RIM SEAL

$$L_S = (0.2)(8.1)^{2.6}(0.14)(100)(66)(1)(1)$$

$$= 42,537 \text{ lbs/yr} = 21.3 \text{ T/yr.} = 4.86 \text{ lbs/hr.}$$

TANKS 18 + 19: INTERNAL FLOAT - GASOLINE

$$L_S = (0.7)(8.1)^{0.4}(0.14)(143)(66)(1)(1) \quad \text{EACH}$$

$$= 2,136 \text{ lbs/yr} = 1.068 \text{ T/yr} = 0.24 \text{ lbs/hr.} \quad \text{EACH}$$

[4] WITHDRAWAL LOSSES:

$$L_W = \frac{(0.943)\, Q C W_L}{D}$$

Q = AVG. THROUGHPUT
C = CLINGAGE FACTOR
W_L = LIQUID DENSITY
D = TANK DIAMETER.

BEST AVAILABLE COPY

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

CALCULATED BY MKG DATE [illegible]

CHECKED BY ____ DATE ____

SCALE BELCHER OIL - PORT CANAVERAL

[4] WITHDRAWAL LOSSES : (cont.)

TANK #9 :

$$L_W = \frac{0.943(434491)(.0015)(5.6)}{80}$$

= 43.02 lbs/Yr = 0.022 T/Yr = 0.005 lbs/hr.

TANK #15 :

$$L_W = \frac{0.943(682,797)(.0015)(5.6)}{100}$$

= 54.1 lbs/Yr = 0.027 T/Yr = 0.006 lbs/hr.

TANKS 17 + 18 :

$$L_W = \frac{0.943(1,241,356)(.0015)(5.6)}{143} \quad \text{EACH}$$

= 68.8 lbs/Yr = .034 T/Yr = 0.008 lbs/hr EACH

NOTES: ALL CALCULATIONS PER AP-42.
SEE PAGE 4, ATTACHMENT "A" FOR SUMMARY TABLE OF EMISSION CALCULATIONS.

TANK SERVICE, INC.
5 Meco Circle
Boxwood Industrial Park
Wilmington, Delaware 19804 / (302) 999-0139

May 4, 1984

Belcher Oil Company
P.O. Box 011751
Miami, Florida 33101

Attention: Mr. T. Green

Reference: T.S.I. Standard Drawings for Primary and Secondary Seals
Tank #15
Cape Canaveral, Flordia

Gentlemen:

As per our telephone conversation of Thursday, May 3, 1984, I am enclosing copies of standard drawings for foam pac primary seals and mini pac secondary seals.

The foam pac primary seal drawings cover both a horizontal attachment and a vertical attachment. The materials in both cases are the same as specified in my letter of April 30, 1984.

The Tank Service, Inc. mini pac secondary seal was installed on tank #15. Enclosed, are copies of the standard drawings for both the single mini pac for welded tanks and the double mini pac for riveted tanks. The materials used in the fabrication of these secondary seals is the same materials used in the foam pac primary seal.

If you should need further clarification of the information provided on these drawings, please call at your convenience.

Very truly yours,

TANK SERVICE, INC.

Michael E. Lee,
Manager of Construction

MEL/ams

enclosures

RECEIVED
MAY 2 1984
TROY W. DALTON

TANK SERVICE, INC.
5 Meco Circle
Boxwood Industrial Park
Wilmington, Delaware 19804 / (302) 999-0139

April 30, 1984

Belcher Oil Company
P.O. Box 011751
Miami, Florida 33101

Attention: Mr. Troy Dalton

Reference: Foam Seal Specifications
Tank #15
Cape Canaveral, Florida

Gentlemen:

In April of 1980, Tank Service, Inc. installed our "Foam-Pac" Primary Seal in tank #15 at your Cape Canaveral, Florida Terminal. The main components of the "Foam-Pac" Primary Seal are the foam, which seals the rim space, and the fabric that encases the foam and wears against the shell.

The foam is a prime quality polyether type urethane foam with the compression set not to exceed 10% at 75% deflection. The density of the foam is 1 to 1.2 lbs./cu.ft. and has an operating temperature range of -20°F to 200°F.

The fabric is a polyurethane on nylon, generally gold or yellow in color. The average thickness of the fabric is 0.030", generally built up thicker on the wear side of the nylon. The fabric is rated for 100% aromatics and has a maximum operating temperature of 140°F.

The balance of the materials are used to hold the seal in place and are generally made of galvanized or black carbon steel.

We hope that this information will be sufficient in your efforts to obtain the desired permits. If you should have any further questions, or if we can be of any further assistance, please call at your convenience.

Very truly yours,

TANK SERVICE, INC.

Michael E. Lee,
Manager of Construction

MEL/ams

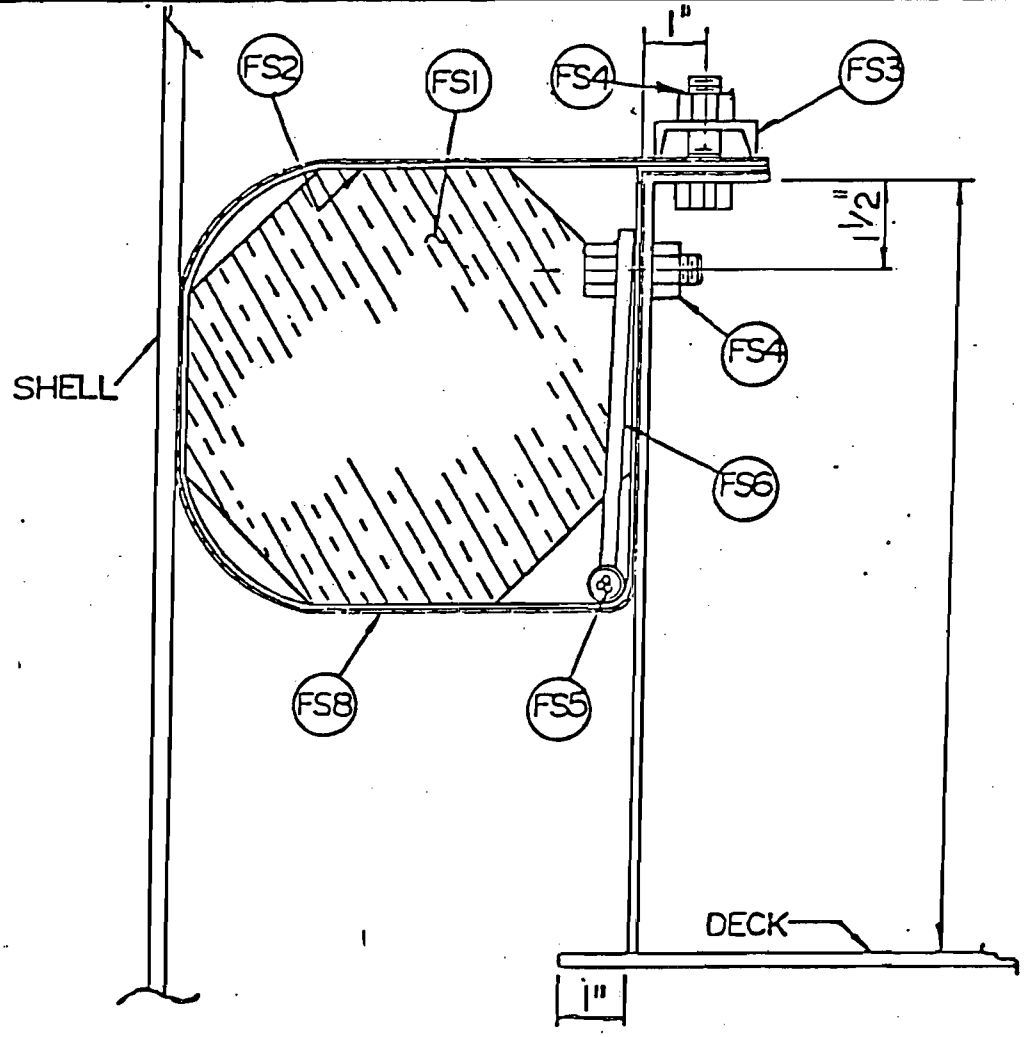
NEED DRAWING
AND EPA INFORMATION
PERMITS [illegible]

PROCEDURE

COMPANY TANK SERVICE, INC.

TITLE
DATA FOR PRIMARY FOAM PAC
BILL OF MATERIAL FOR
HORIZONTAL RIM PLATE

MK.	QUAN.	MK.	QUAN.	DESCRIPTION	PT. NO
FS1				LIN.FT. OCTAGONAL FOAM LOG	
FS2				LIN.FT. WIDE URETHANE SEAL FABRIC	
FS3				C1½"X½"X⅛"X0'-7¾"	
FS4				⅜"ØX1½"MB W/ NUTS (CAD. PL.)	
FS5				LIN.FT. ¼" WIRE ROPE (S.S.)	
FS6				CABLE HOLD-DOWNS X	
FS7	2			¼" CABLE CLAMPS (S.S.)	
FS8				PL.2"X26GA.X (S.S.)	
FS9	1			REEVES 2265 GLUE KIT	



APPROVAL	EFFECTIVE	SUPERSEDES	PAGE
	12/81	3/81	5 of 8

PROCEDURE

COMPANY TANK SERVICE, INC.

CATEGORY: FIELD INSTALLATION | NUMBER: 1.03

TITLE

SINGLE MINI-PAC (TS-4)

HORIZONTAL RIM ℄ ATTACHMENT

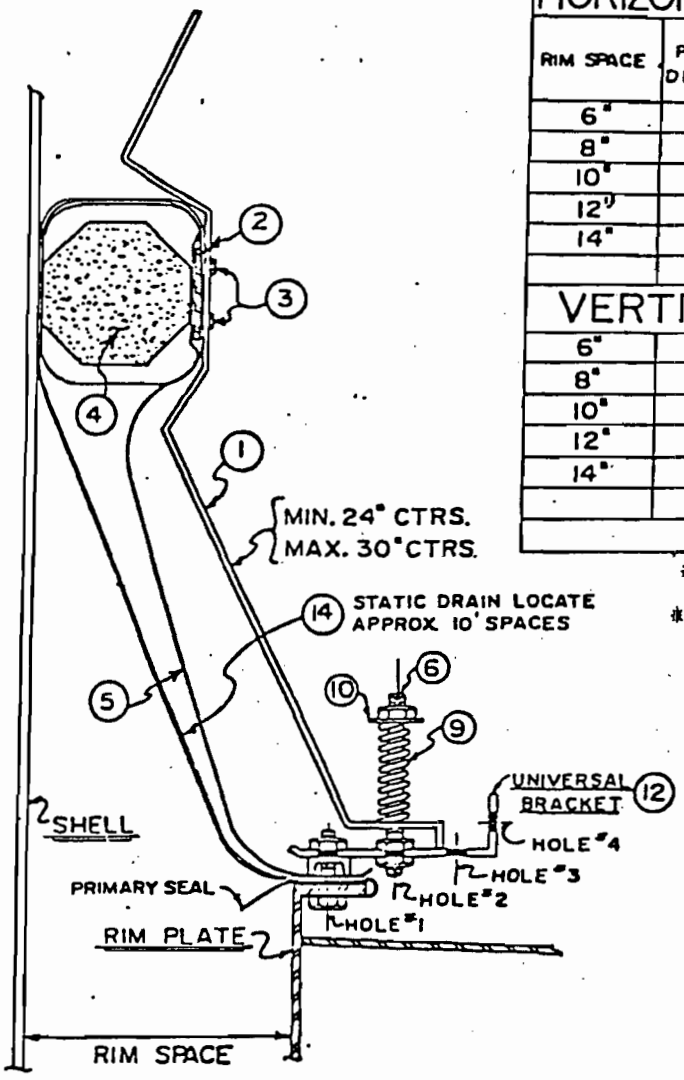
RIM SPACE	POSITION DESCRIPTION	UNIVERSAL BRACKET HOLE Nº TO RIM ℄ HOLE	UNIVERSAL BRACKET HOLE Nº TO STUD	SKIRT WIDTH	STATIC DRAIN LENGTH
6"	Nº1	Nº1	Nº2	19"	34"
8"	Nº1	Nº1	Nº2	19"	34"
10"	Nº2	Nº1	Nº1	21"	36"
12"	Nº3	Nº2	Nº1	23"	38"
14"	Nº4	Nº3	Nº1	25"	40"

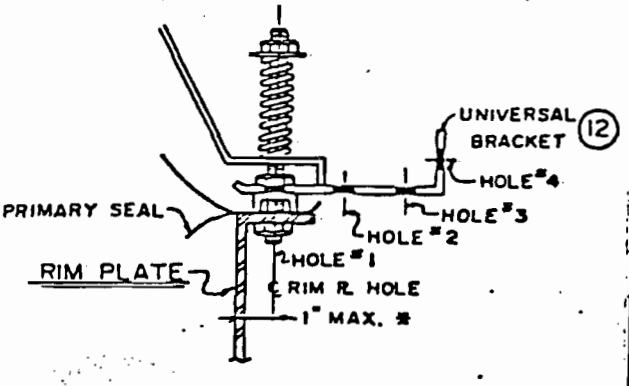
VERTICAL RIM ℄ ATTACHMENT

6"	Nº5	Nº4	Nº2	19"	34"
8"	Nº5	Nº4	Nº2	19"	34"
10"	Nº6	Nº4	Nº3	21"	36"
12"	Nº7**	Nº2*	Nº2	23"	38"
14"	Nº8**	Nº3**	Nº1	25"	40"

* WHEN THIS DIM. IS EXCEEDED, THE MAXIMUM RIM SPACE SHOULD BE ADJUSTED ACCORDINGLY.

** POSITION Nº 7 & 8 MUST USE BRACKET ADAPTER (13)

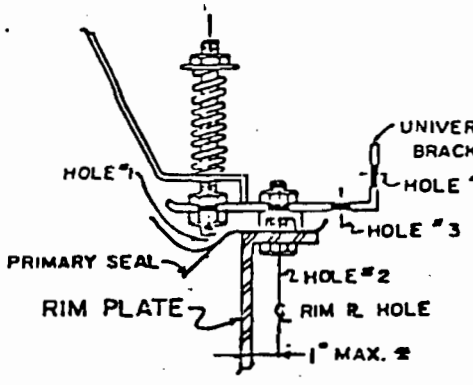


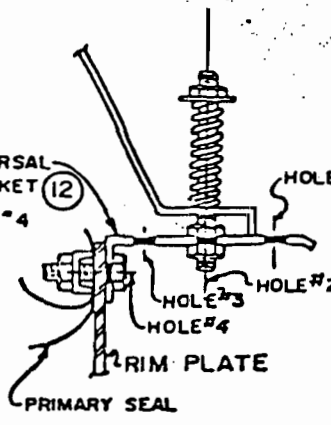


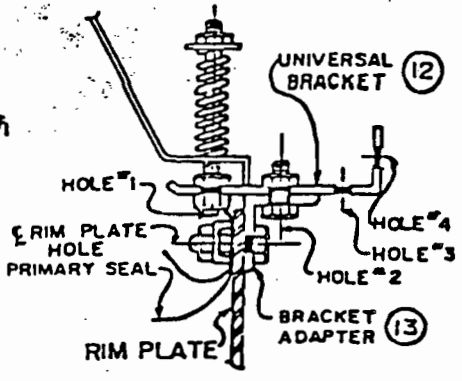
POSITION Nº2

POSITION Nº 1

NOTE: WHEN USING BRK. ADP. (13) ADD QTY. OF BOLTS TO ITEM (11)







POSITION Nº 3&4

POSITION Nº 5&6

POSITION Nº 7&8

APPROVAL	EFFECTIVE	SUPERSEDES	PAGE
	5/81	3/81	1 of 4

ATTACHMENT 6

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

August 8, 1984

CERTIFIED MAIL-RETURN REQUESTED

Mr. Albin W. Smith
President
Belcher Oil Company
Post Office Box 025500
Miami, Florida 33102-5500

Re: Completeness Review of an Application to Modify Air Pollution Sources: Permit No. AC 05-090952 (originally: AC 05-57476, -57477, -57478 and -57479)

Dear Mr. Smith:

The department has received the above referenced application package in which you requested an annual increase in gasoline throughput in the existing gasoline storage tanks Nos. 9, 15, 17 and 18 (facility identification numbers) and to depermit gasoline storage tanks Nos. 7 and 8. The bureau finds the application package incomplete and the following information/requests will have to be submitted before further processing will resume:

1. If there is any proprietary information required in any response(s) to the following requests, please identify and submit as a separate document and the bureau will maintain confidentiality (ref. 403.111, Florida Statutes).

2. What will be the disposition of the gasoline storage tanks Nos. 7 and 8?

3. Since the potential VOC emissions increase per source will be less than 25 tons per year, a processing fee of $100.00 per source will be required. Therefore, remit a total of $400.00 on a cashiers check or money order made out to the Department of Environmental Regulation.

If there are any questions, please call Bruce Mitchell at (904) 488-1344 or write to me at the above address.

Sincerely,

Steve Smallwood P.E.,
Chief
Bureau of Air Quality
Management

CHF/BM/agh

cc: Nancy Wright
D. Thompson
R. Caldwell
Michael K. Gleman

ATTACHMENT 7

GLEMAN ENGINEERING COMPANY
324 DATURA STREET
POST OFFICE BOX 3384
WEST PALM BEACH, FLORIDA 33402
TELEPHONE (305) 655-0506

September 19, 1984

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

DER
SEP 24 1984
BAQM

Attention: Mr. Bruce Mitchell

Re: Belcher Oil Company
Port Canaveral Facility
Your: AC 05-090952
Our: 84-101-1

Gentlemen:

This letter responds to your August 8, 1984 request for additional information as follows:

1. Information contained in the following responses is not considered proprietary by Belcher Oil Company.

2. Storage Tanks #7 and #8 will be refurbished for diesel fuel storage and eventually converted to gasoline storage in response to market conditions. These tanks are not currently in use. Appropriate application for refurbishment and reactivation of these tanks will be made at a future date.

3. Enclosed herewith is a fee check payable to the DER in the amount of $400.00.

4. Enclosed herewith are completed Applications to Modify the referenced storage tanks. Please note these tanks were previously permitted under original permit #'s AC 05-57476, -57477, -57478 and -57479.

We trust this information is sufficient to allow permit application processing to resume. Please feel free to call should additional information be required.

Very truly yours,

Michael K. Gleman, P.E.
President

cc: Mr. Tommy Green (w/o enc.)
Mr. Dan E. Dudley (w/o enc.)
Belcher Oil Company

Encs.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHEAST FLORIDA DISTRICT
3301 GUN CLUB ROAD
P.O. BOX 3858
WEST PALM BEACH, FLORIDA 33402

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Petroleum Storage Tanks [ ] New[1] [X] Existing[1]

APPLICATION TYPE: [ ] Construction [ ] Operation [X] Modification

COMPANY NAME: Belcher Oil Company COUNTY: Brevard

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Petroleum Storage Tanks #9, 15, 17 & 18.

SOURCE LOCATION: Street East Terminal, North Atlantic Avenue City Port Canaveral

UTM: East 753 8980 North 314 1990

Latitude 28 ° 24 ' 24 "N Longitude 80 ° 36 ' 09 "W

APPLICANT NAME AND TITLE: Belcher Oil Company, c/o Mr. Albin W. Smith, President

APPLICANT ADDRESS: P. O. Box 025500, Miami, FL 33102-5500

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Belcher Oil Company

I certify that the statements made in this application for an Existing Source permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Albin W. Smith

Albin W. Smith, President
Name and Title (Please Type)

Date: _____ Telephone No. (305) 551-5223

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.

Signed M K Gleman

Michael K. Gleman, P.E.
Name (Please Type)

Gleman Engineering Company
Company Name (Please Type)

P.O. Box 3384, West Palm Beach, FL 33402
Mailing Address (Please Type)

Florida Registration No. 23175 Date: 9-6-84 Telephone No. (305) 655-0506

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Tanks 9, 15, 17 and 18 are existing petroleum storage tanks previously permitted as indicated below. Project will result in full compliance.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction N/A Completion of Construction N/A

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC 05-57476 AC 05-57479

AC 05-57477

AC 05-57478

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr N/A ; if seasonal, describe: N/A

F. If this is a new source or major modification, answer the following questions. (Yes or No) N/A

1. Is this source in a non-attainment area for a particular pollutant? _____

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. _____

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. _____

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? _____

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? _____

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NO

   a. If yes, for what pollutants? _____

   b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable: NOT APPLICABLE

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

B. Process Rate, if applicable: (See Section V, Item 1) NOT APPLICABLE

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
V.O.C.	5.51	24.12			5.51	24.12	---
NOTE: These emissions are for tanks #9, 15, 17 & 18. Calculations are in							
accordance with AP-42.							

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4) NOT APPLICABLE

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels NOT APPLICABLE

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

_____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average N/A Maximum N/A

G. Indicate liquid or solid wastes generated and method of disposal. N/A

_____

_____

_____

_____

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack): --N/A--

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION NOT APPLICABLE

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq.& Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner

[ ] Other (specify) _____

Brief description of operating characteristics of control devices: _____

_____

_____

_____

_____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

_____

_____

_____

_____

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)] --N/A--

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY NOT APPLICABLE

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

[ ] Yes [ ] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

[ ] Yes [ ] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:
2. Operating Principles:
3. Efficiency:*
4. Capital Costs:

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height: ft.

b. Diameter: ft.

c. Flow Rate: ACFM

d. Temperature: °F.

e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

[1]Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ ( ) SO_2* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling --N/A--

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used --N/A--

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data --N/A--

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

E. Emission Data Used in Modeling --N/A--

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review. --N/A--

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources. --N/A--

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT 8

GLEMAN ENGINEERING COMPANY
324 DATURA STREET
POST OFFICE BOX 3384
WEST PALM BEACH, FLORIDA 33402
TELEPHONE (305) 655-0508

September 21, 1984

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Attention: Mr. Bruce Mitchell

Re: Belcher Oil Company
Port Canaveral Facility
Your: AC 05-090952
Our: 84-101-1

Gentlemen:

This letter confirms verbal information provided to your office during several telephone conversations on September 20, 1984 relating to ethanol throughput at the South Loading Rack for the referenced facility.

Maximum throughput is estimated to be 250,000 gallons per month average. This throughput equates to a total estimated throughput of 3,000,000 gallons (17,429 BBLS) per year maximum. Current throughputs are below this projected maximum and are averaging approximately 175,000 gallons per month. Based upon this 250,000 gallon per month figure, we estimate emissions from the VRU controlling this alcohol dispenser to be 42.58 lbs/YR (.019 lb/HR = .021 T/YR) maximum. Calculations per AP-42 are attached.

Additionally, please consider this alcohol throughput in addition to the currently permitted 3.6 million barrels per year throughput for gasoline.

Your assistance during this permitting process has been appreciated. Please feel free to call regarding any question or need for additional information.

Very truly yours,

Michael K. Gleman, P.E.
President

Enc.
cc: Mr. Dan E. Dudley - Belcher Oil
Mr. Bruce Smith, Jr. - Ethanol Corp.

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB DER PERMITS
SHEET NO. 1 OF 1
CALCULATED BY MKG DATE SEPT '84
CHECKED BY _____ DATE _____
SCALE 84-101-1 BELCHER OIL - CANAVERAL

EMISSION CALCS PER AP-42

FOR ALCOHOL DISPENSER @ SOUTH LOADING RACK

$$L_L = 12.46 \left[\frac{SPM}{T}\right]\left[1 - \frac{eff.}{100}\right]$$

WHERE L_L = LOADING LOSS / 10^3 GAL.

S = SATURATION FACTOR
= 0.6 SUBMERGED LOADING, DEDICATED

P = TRUE VAPOR PRESS
= 1.1 PSIA @ 75°F

M = MOLECULAR WEIGHT
= 46

T = TEMP. °R

$$\therefore L_L = 12.46 \left[\frac{0.6\,(1.1)(46)}{533}\right]\left[1 - \frac{98}{100}\right] = .014194$$

$$= 0.014194 \text{ lbs}/1000 \text{ GAL.}$$

FOR 3,000,000 GAL/YR (250,000 GAL/MONTH MAX):

$$L_L = 0.014194\,(3{,}000{,}000) \div 1{,}000 = 42.58 \text{ lbs/YR}$$

L_L = 42.58 lbs/YR = .021 T/YR = .019 lbs/HR MAX.

ATTACHMENT 9

DER

OCT 3 1984

BAQM

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTION 120.60(2), FLORIDA STATUTES

License (Permit, Certification) Application No. AC 05-090952
AC 05-092822

Applicant's Name: Belcher Oil Company

The undersigned has read Section 120.60(2), Florida Statutes, and fully understands the Applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the Applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Section 120.60(2), Florida Statutes, waives the right under Section 120.60(2), Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Section 120.60(2), Florida Statutes. Said waiver is made freely and voluntarily by the Applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 9th day of December 1984.

The undersigned is authorized to make this waiver on behalf of the applicant.

Albin W. Smith

Signature

Albin W. Smith, President

Name of Signee

October 2, 1984

Date

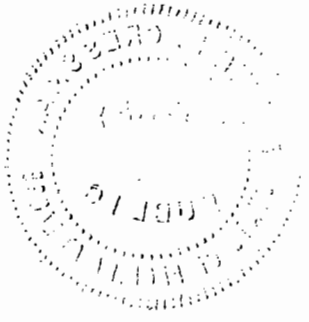
Sworn to and subscribed before me this 02 day of October 1984.

Bonnie L Crossman

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES OCT. 26 1984
BONDED THRU GENERAL INS. UNDERWRITERS

Section 120.60, Florida Statutes

(2) When an application for a license is made as required by law, the agency shall conduct the proceedings required with reasonable dispatch and with due regard to the rights and privileges of all affected parties or aggrieved persons. Within 30 days after receipt of an application for a license, the agency shall examine the application, notify the applicant of any apparent errors or omissions, and request any additional information the agency is permitted by law to require. Failure to correct an error or omission or to supply additional information shall not be grounds for denial of the license unless the agency timely notified the applicant within this 30 day period. The agency shall notify the applicant if the activity for which he seeks a license is exempt from the licensing requirement and return any tendered application fee within 30 days after receipt of the original application or within 10 days after receipt of the timely requested additional information or correction of errors or omissions. Every application for license shall be approved or denied within 90 days after receipt of the original application or receipt of the timely requested additional information or correction of errors or omissions. Any application for a license not approved or denied within the 90-day period or within 15 days after conclusion of a public hearing held on the application, whichever is latest, shall be deemed approved and, subject to the satisfactory completion of an examination, if required as a prerequisite to licensure, [2](the license) shall be issued. The Public Service Commission, when issuing a license, and any other agency, if specifically exempted by law, shall be exempt from the time limitations within this subsection. Each agency, upon issuing or denying a license, shall state with particularity the grounds or basis for the issuance or denial of same, except where issuance is a ministerial act. On denial of a license application on which there has been no hearing, the denying agency shall inform the applicant of any right to a hearing pursuant to s. 120.57.



ATTACHMENT 10

GLEMAN ENGINEERING COMPANY
324 DATURA STREET
POST OFFICE BOX 3384
WEST PALM BEACH, FLORIDA 33402
TELEPHONE (305) 655-0506

October 18, 1984

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

DER
OCT 22 1984
BAQM

Attention: Mr. Bruce Mitchell

Re: Belcher Oil Company
Port Canaveral Facility
Your: AC 05-~~090952~~ 094507
Our: 84-101-1

Gentlemen:

As discussed by phone, this letter confirms that Belcher Oil Company is planning to renovate Storage Tank #7 (nominal 55,000 BBLS capacity) in the near future. It is anticipated that work on this tank will begin as soon as a permit can be secured and completed within several months thereafter. Upon completion of this work, the tank will be used as a fixed roof tank.

Annual throughput is estimated to be 811,000 BBLS. This throughput will be in addition to the currently permitted diesel throughput for Tanks #1, 12 and 13. Total estimated emissions from Tank #7 is 2,179.98 lbs/Yr (1.09 T/Yr) of which 1,226.24 lbs/Yr (.61 T/Yr) is breathing loss and 953.74 lbs/Yr (.48 T/Yr) is working loss. Calculations per AP-42 are enclosed.

We understand that this renovation of Tank #7 can be included in the current construction permitting review being conducted by your office. Please feel free to call regarding any question or need for additional information.

Very truly yours,

Michael K. Gleman, P.E.
President

MKG/lm
Enc.

cc: Mr. Dan E. Dudley - Belcher Oil Company
Roger Caldwell - 10/23/84

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB 84-101-1
SHEET NO. 1 OF 2
CALCULATED BY MLG DATE OCT '84
CHECKED BY DATE
SCALE BELCHER OIL - PORT CANAVERAL

EMISSION CALCULATIONS
STORAGE TANK #7 - FIXED ROOF
100' ϕ x 40' HEIGHT

[1] BREATHING LOSSES:

$$L_B = 2.26 \times 10^{-2} M \left[\frac{P}{14.7 - P}\right]^{.68} D^{1.73} H^{.51} \Delta T^{.50} F_P C K_C = \text{lbs/YR}$$

WHERE M = MOLECULAR WEIGHT = 130

P = TRUE VAPOR PRESS. = .0090

D = TANK DIAMETER = 100

H = AVG. VAPOR SPACE HEIGHT WITH ROOF CORRECTION = 21.39

ΔT = AVG. DIURNAL TEMP. CHANGE = 11.0 (79° - 68° PER NOAA CLIMATOLOGICAL DATA)

F_P = PAINT FACTOR = 1.40 (medium grey)

C = SMALL TANK ADJUSTMENT FACTOR = 1.0

K_C = PRODUCT FACTOR = 1.0

$$L_B = 2.26 \times 10^{-2} [130] \left[\frac{.0090}{14.7 - .009}\right]^{.68} [100]^{1.73} [21.39]^{.51} [11]^{.50} [1.4][1.0][1.0]$$

$$L_B = \underline{1,226.24 \text{ lbs/YR} = .61 \text{ T/YR.}}$$

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB 84-101-1
SHEET NO. 2 OF 2
CALCULATED BY MKG DATE
CHECKED BY DATE
SCALE BELCHER OIL - PORT CANAVERAL

[2] WORKING LOSSES:

$$L_W = 2.40 \times 10^{-2} M P K_N K_C$$

WHERE M = MOLECULAR WEIGHT = 130

P = TRUE VAPOR PRESS. = .0090

K_N = TURNOVER FACTOR = 1.0 FOR 15 TURNOVERS ±

K_C = PRODUCT FACTOR = 1.0

$$L_W = 2.40 \times 10^{-2} (130)(.0090)(1.0)(1.0) \text{ lbs}/1000 \text{ GAL}$$

$$= .028 \text{ lbs}/1000 \text{ GAL.}$$

FOR 811,000 BBLS = 34,062,000 GAL.

$$\therefore L_W = .028/1000 \text{ GAL} \times 34,062,000$$

$$= \underline{953.74 \text{ lbs}/\text{YR}}$$

TOTAL LOSSES = $L_B + L_W$

$$= 1,226.24 + 953.74$$

$$= \underline{2,179.98 \text{ lbs}/\text{YR} = 1.09 \text{ T}/\text{YR}}$$

AC 05-092822

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE: Belcher Oil Company
Port Canaveral Bulk Gasoline Terminal
P. O. Box 525500
Miami, Florida 33152

I.D. Number:
Permit/Certification Number: AC 05-092822
Date of Issue:
Expiration Date: June 1, 1985
County: Brevard
Latitude/Longitude: 28° 24' 20" N/80° 36' 09" W
Section/Township/Range:
Project: Modification of the South Loading Rack (4 Gasoline, 2 Diesel, 1 Jet Kerosene and 1 Ethanol dispenser(s)) and its Vapor Recovery System

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For a modification to allow an increase in the allowable VOC emission rate from the existing South Loading Rack (SLR; 4 Gasoline, 2 Diesel (No. 2 Fuel Oil), 1 Jet Kerosene and 1 Ethanol dispenser(s)) and its vapor recovery system (VRS) that services the SLR during gasoline loading operations. The maximum allowable emission rate from the SLR-VRS shall be 35 milligrams total organic compounds per liter of gasoline loaded. The UTM coordinates are Zone 17-589.9 km East and 3142.0 km North.

The modification shall be in accordance with the permit application and plans, documents, amendments, and drawings except as otherwise noted on pages 4 and 5 of the "Specific Conditions."

Attachments are as follows:

1. Construction permit No. AC 05-57480 and its attachments, modifications and amendments.
2. Michael K. Gleman's letter with attachments dated April 26, 1984.
3. Albin W. Smith's letter with attachments dated June 21, 1984.
4. Steve Smallwood's letter dated August 8, 1984.
5. Michael K. Gleman's letter with DER Form 17-1.202 attached dated September 19, 1984.
6. Michael K. Gleman's letter with attachment dated September 21, 1984.
7. "Waiver of 90 day time limit" dated October 2, 1984, and signed by Albin W. Smith.
8. Michael K. Gleman's letter with attachments dated October 18, 1984.

PERMITTEE: Belcher Oil Company
Port Canaveral Bulk Gasoline Terminal
P. O. Box 525500
Miami, Florida 33152

I.D. Number:
Permit/Certification Number: AC 05-092822
Date of Issue:
Expiration Date: June 1, 1985

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specificslly authorized by an order from the department.

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

   a. Having access to and copying any records that must be kept under the conditions of the permit;

   b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

   c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

   Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

   a. a description of and cause of non-compliance; and

b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit applicstion or in any report to the department, such facts or information shall be submitted or corrected promptly.

PERMITTEE: Belcher Oil Company
Port Canaveral Bulk Gasoline Terminal
P. O. Box 525500
Miami, Florida 33152

I.D. Number:
Permit/Certification Number: AC 05-092822
Date of Issue:
Expiration Date: June 1, 1985

SPECIFIC CONDITIONS:

1. The modification should reasonably conform to the application, plans, documents, and amendments submitted.

2. The applicant should report any delays in the modification and completion of to the DER's St. Johns River District office.

3. Annual hours of operation will be 8760.

4. Objectionable odors shall not be allowed on off-plant property.

5. The maximum allowable VOC emission rate from the vapor recovery system (VRS) servicing the South Loading Rack (SLR) "A" and "B" shall be 35 milligrams total organic compounds per liter of gasoline loaded (9.91 lbs/hr/dispenser and 22.0 TPY-total, based on 2224 hours of proposed gasoline dispensing).

6. The maximum average flow rate allowed from the SLR "A" and "B" combined in any one 24-hour period is 25,850 gals/hr gasoline only and 28,516 gals/hr all products. The maximum gasoline loading rate of the SLR, total of any two loading dispensers, is 68,000 gallons per hour. Total annual gasoline throughput at the SLR shall not exceed 3,600,000 barrels per year (bbls/yr).

7. Compliance with the mass emission rate limitation of Specific Condition No. 5 shall be determined in accordance with the method referred in 17-2.700(6)(c)2.b.(i), FAC (EPA 450/2-77-026, Appendix A). At least 30 days prior to the date of compliance testing, the DER's St. Johns River District office or its designee shall be notified in order to witness the test.

8. During the compliance test, the gasoline loading rate shall be representative of "normal operation" as outlined in the attached EPA test method guideline, EPA 450/2-77-026, Appendix A, section 5-2.

9. Expected petroleum (non-gasoline) throughput of the SLR (4 dispensers) and their projected potential VOC emissions are:

Source	Dispensers/Product Transferred		Throughput bbls/yr	VOC Emissions lbs/yr
SLR	2	Diesel	324,000	248.1
	1	Jet Kerosene	16,800	15.4
	1	Ethanol	71,429	42.6
			Total:	306.1

10. Since the VOC emissions from the petroleum products transferred from the source referenced in #9 are considered to be area-wide (facility) emissions, compliance verification shall be by periodic visual inspections of the equipment used to transfer the petroleum products. The visual inspections shall be conducted by the DER's St. Johns River District office. Any corrective action shall be concurred with the District office.

11. Annual operating reports shall be submitted to the DER's St. Johns River District office or its designee and shall be due January 14 of each calendar year. This report shall contain records of the gasoline and petroleum (non-gasoline) throughput.

12. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to the DER's St. Johns River District office prior to 90 days of the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or issuance of an operating permit.

PERMITTEE: Belcher Oil Company
Port Canaveral Bulk Gasoline Terminal
P. O. Box 525500
Miami, Florida 33152

I.D. Number:
Permit/Certification Number: AC 05-092822
Date of Issue:
Expiration Date: June 1, 1985

SPECIFIC CONDITIONS:

Issued this____day of_____, 19____

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

_____

_____Attachments

ATTACHMENT 1

ATTACHMENT 1

Available Upon Request.

ATTACHMENT 2

GLEMAN ENGINEERING COMPANY
324 DATURA STREET
POST OFFICE BOX 3384
WEST PALM BEACH, FLORIDA 33402
TELEPHONE (305) 655-0506

April 26, 1984

State of Florida
Department of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Attn: Mr. Roger Caldwell

Re: Brevard County - AP
Belcher Oil Company
VRU Testing Program
Our: 84-101-1

Gentlemen:

Thank you for meeting with us on April 19, 1984 to review the VRU Test Results for the referenced facility and to discuss the operation conditions for the anticipated permit in general terms. We regret any misunderstanding regarding the original purpose of this meeting.

As discussed, we understand the DER will consider issuing an Operation Permit that will allow for the following operating conditions:

1. An allowable emission rate of 35 mg/l conforming to current regulatory requirements. Enclosed are calculations showing total emissions will remain under 100 T/Yr for this 35 mg/l rate.

2. An allowable maximum gasoline loading flow rate of 25,850 GPH average over any 24-hour period. This flow being equal to the test flow rate of 19,387 GPH divided by the 75% of maximum requirement outlined in EPA test procedures.

3. An allowable "peak" gasoline flow rate of 68,000 GPH provided the 25,850 GPH average is not exceeded. This 68,000 GPH flow rate corresponds to the flow rate originally permitted for this VRU.

   Additionally, this 68,000 GPH flow rate was actually tested between 8:40 A.M. and 8:55 A.M. the morning of the test. Total flow for this 15-minute interval was 17,350 gallons with an average emission rate of 1.5 mg/l. Extrapolating this 15-minute interval to an hour yields a flow of 69,400 GPH.

   Data for this test interval is shown in the truck data sheets and computer print-out summary in the test report. Calculations verifying these conditions will follow within several days.

Because of the restrictive nature some of these questions could have on Belcher Oil Company's business at this facility, we trust the DER will give every consideration in reviewing these items.

Again, we appreciate your cooperation and efforts to resolve these questions. We are ready to answer any questions or review these items via telephone or in person in order to reach a successful conclusion. Please feel free to call if you have any questions.

Very truly yours,

GLEMAN ENGINEERING COMPANY

Michael K. Gleman, P.E.
President

MKG/ms

cc: Mr. Troy Dalton - Belcher Oil

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB 24-101-1
SHEET NO 1 OF 2
CALCULATED BY MKG DATE APR '84
CHECKED BY DATE
SCALE PORT CANAVERAL - BELCHER O

EMISSION CALCULATIONS

SHOWING 35 mg/l VOC EMISSION FROM VRU
RESULTS IN LESS THAN 100 T/YR
TOTAL EMISSIONS

1. CURRENT PERMITTED
TANK EMISSIONS - GASOLINE VOC: 144,041 lbs/YR = 72.04 T/

2. CURRENT PERMITTED 14.9 from limit
VRU EMISSIONS: = 15.06 T/

CURRENT PERMITTED TOTAL: 87.10

3. NEW VRU EMISSIONS FOR 35 mg/l.

AND 65,000 GPH = MAXIMUM FLOW RATE:

A. TOTAL # OF ACTUAL PUMPING HRS/YR =

$$\left[3.6 \times 10^6 \text{ BBLS} \times 42 \text{ GAL./BLL}\right] \div 68{,}000 \text{ GPH} = 2224 \text{ HRS/YR}$$

B. ALLOWABLE EMISSIONS AT 80 mg/l. = L_L

$$L_L = \left[80 \text{ mg/l}\right]\left[3.785 \text{ l/gal.}\right]\left[\frac{1\text{b}}{454{,}592 \text{ mg}}\right]\left[68000 \text{ GPH}\right]$$

$$= 45.3 \text{ lbs/hr}$$

C. ∴ ALLOWABLE EMISSIONS AT 35 mg/l =

$$\left[35/80\right]\left[45.3\right] = 19.82 \text{ lbs/hr.}$$

D. TOTAL ANNUAL EMISSIONS AT 35 mg/l:
19.82 lbs/hr × 2224 = 22.04 T/YR.

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB C. 101-1
SHEET NO 2 OF 2
CALCULATED BY MKG DATE APR '84
CHECKED BY DATE
SCALE PORT CANAVERAL - BELCHER O

3. CONT.

E. TOTAL ADDITIONAL VRU EMISSIONS FOR 35 mg/l RATE:

22.04 NEW
14.93 EXIST'G - PERMITTED
7.11 ADDITIONAL T/YR

4. SUMMARY:

A. CURRENT PERMITTED TOTAL: 87.10 T/Y

B. ADDITIONAL EMISSIONS FOR 35 mg/l RATE: 7.11 T/Y

NEW TOTAL 94.21 T/Y

ATTACHMENT 3

R.C. AC 05-090952 C'mL C

Belcher

DER
JUL 26 1984
BAQM

ALBIN W. SMITH
PRESIDENT

June 21, 1984

State of Florida
Department of Environmental Regulation
St. Johns River District
3319 Maguire Boulevard
Orlando, Florida 32803

RECEIVED JUL 1984 Saint Johns River District

Attention: Mr. Roger Caldwell

Re: Belcher Oil Company Terminal
Port Canaveral, Florida

Gentlemen:

This letter is a request for modifications to certain existing air pollution operation permits for the referenced facility. These modifications slightly increase emissions from Tanks no. 9, 17 and 18 and significantly reduce emissions from Tank no. 15. The affected permits are as follows:

AC-05-57476
AC-05-57477
AC-05-57478
AC-05-57479

The enclosed explanations, calculations and supporting data for this request were prepared by our consultant, Gleman Engineering Company.

Please feel free to contact us or our consultant should you have any questions concerning this request.

Sincerely,

BELCHER OIL COMPANY

Albin W. Smith

Albin W. Smith
President

AWS:bc
Attachment

BELCHER OIL COMPANY, P.O. BOX 025500, MIAMI, FLORIDA 33102-5500 PHONE (305) 551-5200

GLEMAN ENGINEERING COMPANY
324 DATURA STREET
POST OFFICE BOX 3384
WEST PALM BEACH, FLORIDA 33402
TELEPHONE (305) 655-0506

June 20, 1984

State of Florida
Department of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Attention: Mr. Roger Caldwell

Re: Brevard County - AP
Belcher Oil Company
Gasoline Loading Racks
Your: A005-85950 (SLR "A" & "B")
A005-57476 (Tank 7)
A005-57477 (Tanks 8 & 9)
A005-57478 (Tank 15)
A005-57479 (Tanks 17 & 18)
Our: 84-101-1

Gentlemen:

This letter responds to your June 5, 1984 request for additional information as follows:

1. The total yearly facility VOC emissions figure of 99.71 T/yr includes all sources owned by Belcher Oil Company at this facility except the Asphalt Heaters that contribute an additional .025 T/yr. However, all previous emission totals contained an erroneous emission rate of 68.15 T/yr (136,301 lbs/yr) for Tank #15. This excessively high emission rate was a result of using incorrect seal factors for this tank during permitting in 1982. New calculations are enclosed that show an actual emission rate of 21.30 T/yr.

   Additionally, since Tanks #7 & 8 are not being operated or permitted at this time, we have adjusted throughputs and corresponding emissions for the remaining tanks proportionately to maintain the current permitted throughput for the VRU at 3,600,000 BBLS/Yr.

   These corrections and adjustments result in a new emission total for the entire facility of 51.46 T/yr. Total permitted gasoline throughputs will remain unchanged.

   Because of these adjustments, we feel modifications to the existing permits for the affected tanks are warranted at this time. Calculations and supporting data are enclosed.

- continued -

2. See Attachment "A" enclosed herewith for a list of all sources and related VOC emissions for this facility.

We trust this information is sufficient to allow issuance of an Operating Permit for the gasoline loading racks and VRU and for modifications to existing permits for the referenced tankage permits. Please feel free to call should you require additional information.

Very truly yours,

GLEMAN ENGINEERING COMPANY

Michael K. Gleman, P.E.
President

MKG/lm

cc: Mr. Tommy Green - Belcher Oil

Enc.

ATTACHMENT "A" - Page 1

Belcher Oil Company

Port Canaveral Terminal

Total Product Emissions

Source	Losses lbs/yr			
	Breathing/ Standing	Working/ Withdrawal	Loading	Total
Tanks 9,15,17,18 and SLR "A" & "B"	48,004	235	44,343	92,582 (46.29)
Tanks 1-6/10-14 and North Loading Rack	8,025	1,546	709	10,280 (5.14)
Asphalt Heaters	-----	-----	-----	50 (.025)
Totals - lbs/yr - (T/yr)	56,029 (28.02)	1,781 (.89)	45,052 (22.53)	102,912 (51.46)

NOTE:
1. Tanks 7 & 8 not used and therefore not listed.
2. Tank 15 emissions reduced - see calculations.
3. Loading losses for SLR "A" & "B" increased to reflect 35.0 mg/l discharge rate - see AO 05-85950. Also includes loading losses of 248 lbs/yr (No. 2 Oil) and 15 lbs/yr (Jet A) previously permitted.

ATTACHMENT "A" - Page 2

Belcher Oil Company

Pt. Canaveral Terminal

Tank and Loading Rack Information

Tank No.	Type	Capacity (bbl)	Product	Dimensions (f
#1	Cone	80,000	No. 2 Oil	120Ø X 40
#2	Cone	55,000	No. 6 Oil	100Ø X 40
#3	Cone	35,000	Jet A	80Ø X 40
#4	Cone	20,000	AC-20	60Ø X 40
#5	Cone	1,200	AC-20	19Ø X 24
#6	Cone	20,000	AC-20	60Ø X 40
#7	Internal Float	55,000	Not Used	100Ø X 40
#8	Internal Float	35,000	Not Used	80Ø X 40
#9	Internal Float	35,000	Gasoline	80Ø X 40
#10	Cone	3,000	RC-70	30Ø X 24
#11	Cone	3,000	RC-70	30Ø X 24
#12	Cone	9,000	No. 2 Oil	40Ø X 40
#13	Cone	9,000	No. 2 Oil	40Ø X 40
#14	Cone	1,500	AC-20	21Ø X 24
#15	Ext. Float	55,000	Gasoline	100Ø X 40
#17	Internal Float	100,000	Gasoline	143Ø X 42
#18	Internal Float	100,000	Gasoline	143Ø X 42

Loading Rack Positions:

South	North
SLR "A"	2 Diesel
SLR "B"	1 Bunker
	1 Asphalt
	1 Jet Kerosene

Notes: (1) No Tank 16

ATTACHMENT "A" - Page 3

Belcher Oil Company

Cape Canaveral Terminal Product Emissions

Breathing and Working Losses

(Tanks 1-6 and 10-14)

Tank	Product	Capacity (bbls)	Throughout (bbls/yr).	Losses (lbs/yr)		
				Breathing	Working	Tota
1	No. 2	80,000	662,040	1620	781	2401
2	No. 6	55,000	366,000	57	4	61
3	Kerosene	35,000	84,000	906	121	1027
4	*AC-20	20,000	86,183	-	-	-
5	*AC-20	1,200	5,171	-	-	-
6	*AC-20	20,000	86,183	-	-	-
10	RC-70	3,000	6,000	2486	232	2718
11	RC-70	3,000	6,000	2486	232	2718
12	No. 2	9,000	74,480	235	88	323
13	No. 2	9,000	74,480	235	88	323
14	*AC-20	1,500	6,463	-	-	-
				8,025	1,546	9,57

NOTE:
Emissions not calculated for AC-20 asphalt product due to extremely low vap
pressure.

Emissions on this page currently permitted - see AC 05-62236

Gasoline Storage Tank Information
-Summary of Standing/Withdrawal Emissions-

Tank	Type	Capacity (bbls)	Dimensions (ft)	Throughput (bbls/yr)	Losses (lbs/yr)		
					Standing	Withdrawal	Total
7	int float	55,000*	100Ø X 40	-0- (not used)	-0- (not used)	-0- (not used)	-0-
8	int float	35,000*	80Ø X 40	-0- (not used)	-0- (not used)	-0- (not used)	-0-
9	int float	35,000	80Ø X 40	434,491	1,195	43	1,238
15	ext float	55,000	100Ø X 40	682,797	42,537	54	42,591
17	int float	100,000	143Ø X 42	1,241,356	2,136	69	2,205
18	int float	100,000	143Ø X 42	1,241,356	2,136	69	2,205
-	-	290,000*	-	3,600,000	48,004	235	48,239

Note: (1) Tanks 7 and 8 not intended for usage or permitting at this time.
(2) Tank 15 emissions reduced - see calculations.
(3) Throughputs for remaining tanks (9-15-17-18) proportionately increased to maintain total throughput of 3,600,000 BBLS/YR.
(*) Storage capacities for Tanks 7 & 8 not included in total capacity for facility.

ATTACHMENT "A" - Page 5

Belcher Oil Company

Cape Canaveral Terminal Product Emissions

North Loading Rack - Loading Losses

Product	Emissions		Potential Emissions	
	Maximum Hourly (lbs/hr)	Actual Annual (T/yr)	Maximum Hourly (lbs/hr)	Potential Annual (T/yr)
No. 2 Oil	1.24	0.19	1.24	0.19
No. 6 Oil	0.005	0.03	0.005	0.03
Jet Kerosene	0.74	0.001	0.74	0.001
RC-70	18.30	0.14	18.30	0.14
	20.3	0.36	20.3	0.36

ATTACHMENT "A" - Page 6

Belcher Oil Company

Cape Canaveral Terminal

Product Emissions Summary

(Tanks 1-6 and 10-14 and North Loading Rack)

Losses	(lbs/yr)
Breathing	8,025
Working	1,546
Loading	709
Total Hydrocarbon Losses =	10,280 lbs/yr
	5.14 T/yr

NOTE:
These emissions currently permitted - see AC 05-62236

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB 84-101-1
SHEET NO. 1 OF 4
CALCULATED BY MJG DATE JUNE '84
CHECKED BY _____ DATE _____
SCALE BELCHER OIL - PORT CANAVERAL

EMISSION CALCULATIONS

STORAGE TANKS 9 - 15 - 17 - 18

[1] BACKGROUND DATA:

	CURRENT PERMITTED THROUGHPUT		NEW THROUGHPUT	
TANK # 7	521,053	BBLS/Yr.	- 0 -	
8	331,579		- 0 -	
9	331,579		434,491	BBLS/YR.
15	521,053		682,797	
17	947,368		1,241,356	
18	947,368		1,241,356	
TOTAL	3,600,000		3,600,000	

	CURRENT PERMITTED EMISSIONS		NEW EMISSIONS	
Tank # 7	1,534	lbs/Yr.	- 0 -	
8	1,228		- 0 -	
9	1,228		1,238	lbs/Yr.
15	136,301		42,591	
17	2,189		2,205	
18	2,189		2,205	
	144,415		48,239	

[2] CLIMATOLOGICAL DATA:

T_{Avg} = 79° F MAX

T_{Avg} = 68° F MIN.

T_{Avg} = 73° F MEAN

V = 8.1 MPH

SOURCE: NOAA FOR PATRICK AFB (COCOA BEACH).

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB

SHEET NO. 2 OF 4

CALCULATED BY MKG DATE JUNE '81

CHECKED BY DATE

SCALE BELCHER OIL - PORT CANAVERAL

[3] STANDING STORAGE LOSSES :

$$L_s = K_s V^N P^* D M_v K_c E_F \quad \langle lbs/Yr \rangle$$

K_s = SEAL FACTOR.
V = AVG. WIND VELOCITY
N = SEAL RELATED WIND SPEED EXPONENT
P^* = VAPOR PRESSURE FUNCTION
D = TANK DIAMETER
M_V = VAPOR MOLECULAR WEIGHT
K_C = PRODUCT FACTOR
E_F = SECONDARY SEAL FACTOR
P_A = ATMOS. PRESSURE (PSIA)

TANK #9 : INTERNAL FLOAT - GASOLINE

$$L_s = (0.7)(8.1)^{0.4}(0.14)(80)(66)(1)(1)$$

$$= 1,195 \text{ lbs/yr} = 0.598 \text{ T/Yr.} - 0.14 \text{ lbs/hr.}$$

TANK #15 : EXTERNAL FLOATING ROOF - GASOLINE

A. USING INCORRECT SEAL FACTORS OF $K_s = 1.2$ + $N = 2.3$ FOR 'VAPOR MOUNTED PRIMARY SEAL

$$L_s = (1.2)(8.1)^{2.3}(0.14)(100)(66)(1)(1)$$

$$= 136,260 \text{ lbs/Yr} - 68.13 \text{ T/Yr} - 15.6 \text{ lbs/hr.}$$

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

CALCULATED BY MKG DATE [illegible] '84
CHECKED BY DATE
SCALE BELCHER OIL - PORT CANAVERAL

[3] STANDING STORAGE LOSSES : (cont.)

TANK # 15 : (cont.)

B. USING CORRECT SEAL FACTORS OF $K_s = 0.2$ + $N = 2.6$ FOR VAPOR MOUNTED RESILIENT SEAL w/ SECONDARY RIM SEAL

$$L_s = \langle 0.2\rangle\langle 8.1\rangle^{2.6}\langle 0.14\rangle\langle 100\rangle\langle 66\rangle\langle 1\rangle\langle 1\rangle$$

$$= 42{,}537 \text{ lbs/yr} = 21.3 \text{ T/Yr.} = 4.86 \text{ lbs/hr.}$$

TANKS 18 + 19 : INTERNAL FLOAT - GASOLINE

$$L_s = \langle 0.7\rangle\langle 8.1\rangle^{0.4}\langle 0.14\rangle\langle 143\rangle\langle 66\rangle\langle 1\rangle\langle 1\rangle \quad \text{EACH}$$

$$= 2{,}136 \text{ lbs/Yr} = 1.068 \text{ T/Yr} = 0.24 \text{ lbs/hr.} \quad \text{EACH}$$

[4] WITHDRAWAL LOSSES :

$$L_W = \frac{\langle 0.943\rangle\, Q C W_L}{D}$$

Q = AVG. THROUGHPUT
C = CLINGAGE FACTOR
W_L = LIQUID DENSITY
D = TANK DIAMETER.

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

SHEET NO. 4 OF 4
CALCULATED BY [illegible] DATE [illegible]
CHECKED BY DATE
SCALE BELCHER OIL - PORT CANAVERAL

[4] WITHDRAWAL LOSSES: (cont.)

TANK #9:

$$L_W = \frac{0.943(434,491)(.0015)(5.6)}{80}$$

$$= 43.02 \text{ lbs/Yr} = 0.022 \text{ T/Yr} = 0.005 \text{ lbs/hr.}$$

TANK #15:

$$L_W = \frac{0.943(682,797)(.0015)(5.6)}{100}$$

$$= 54.1 \text{ lbs/Yr} = 0.027 \text{ T/Yr} = 0.006 \text{ lbs/hr.}$$

TANKS 17 + 18:

$$L_W = \frac{0.943(1,241,356)(.0015)(5.6)}{143} \quad \text{EACH}$$

$$= 68.8 \text{ lbs/Yr} = .034 \text{ T/Yr} = 0.008 \text{ lbs/hr EACH}$$

NOTES: ALL CALCULATIONS PER AP-42.
SEE PAGE 4, ATTACHMENT "A" FOR SUMMARY TABLE OF EMISSION CALCULATIONS.

TANK SERVICE, INC.
5 Meco Circle
Boxwood Industrial Park
Wilmington, Delaware 19804 / (302) 999-0139

May 4, 1984

Belcher Oil Company
P.O. Box 011751
Miami, Florida 33101

Attention: Mr. T. Green

Reference: T.S.I. Standard Drawings for Primary and Secondary Seals
Tank #15
Cape Canaveral, Flordia

Gentlemen:

As per our telephone conversation of Thursday, May 3, 1984, I am enclosing copies of standard drawings for foam pac primary seals and mini pac secondary seals.

The foam pac primary seal drawings cover both a horizontal attachment and a vertical attachment. The materials in both cases are the same as specified in my letter of April 30, 1984.

The Tank Service, Inc. mini pac secondary seal was installed on tank #15. Enclosed, are copies of the standard drawings for both the single mini pac for welded tanks and the double mini pac for riveted tanks. The materials used in the fabrication of these secondary seals is the same materials used in the foam pac primary seal.

If you should need further clarification of the information provided on these drawings, please call at your convenience.

Very truly yours,

TANK SERVICE, INC.

Michael E. Lee,
Manager of Construction

MEL/ams

enclosures

TANK SERVICE, INC.
5 Meco Circle
Boxwood Industrial Park
Wilmington, Delaware 19804 / (302) 999-0139

April 30, 1984

Belcher Oil Company
P.O. Box 011751
Miami, Florida 33101

Attention: Mr. Troy Dalton

Reference: Foam Seal Specifications
Tank #15
Cape Canaveral, Florida

Gentlemen:

In April of 1980, Tank Service, Inc. installed our "Foam-Pac" Primary Seal in tank #15 at your Cape Canaveral, Florida Terminal. The main components of the "Foam-Pac" Primary Seal are the foam, which seals the rim space, and the fabric that encases the foam and wears against the shell.

The foam is a prime quality polyether type urethane foam with the compression set not to exceed 10% at 75% deflection. The density of the foam is 1 to 1.2 lbs./cu.ft. and has an operating temperature range of -20°F to 200°F.

The fabric is a polyurethane on nylon, generally gold or yellow in color. The average thickness of the fabric is 0.030", generally built up thicker on the wear side of the nylon. The fabric is rated for 100% aromatics and has a maximum operating temperature of 140°F.

The balance of the materials are used to hold the seal in place and are generally made of galvanized or black carbon steel.

We hope that this information will be sufficient in your efforts to obtain the desired permits. If you should have any further questions, or if we can be of any further assistance, please call at your convenience.

Very truly yours,

TANK SERVICE, INC.

Michael E. Lee,
Manager of Construction

MEL/ams

NEED DRAWING
AND EPA INFORMATION

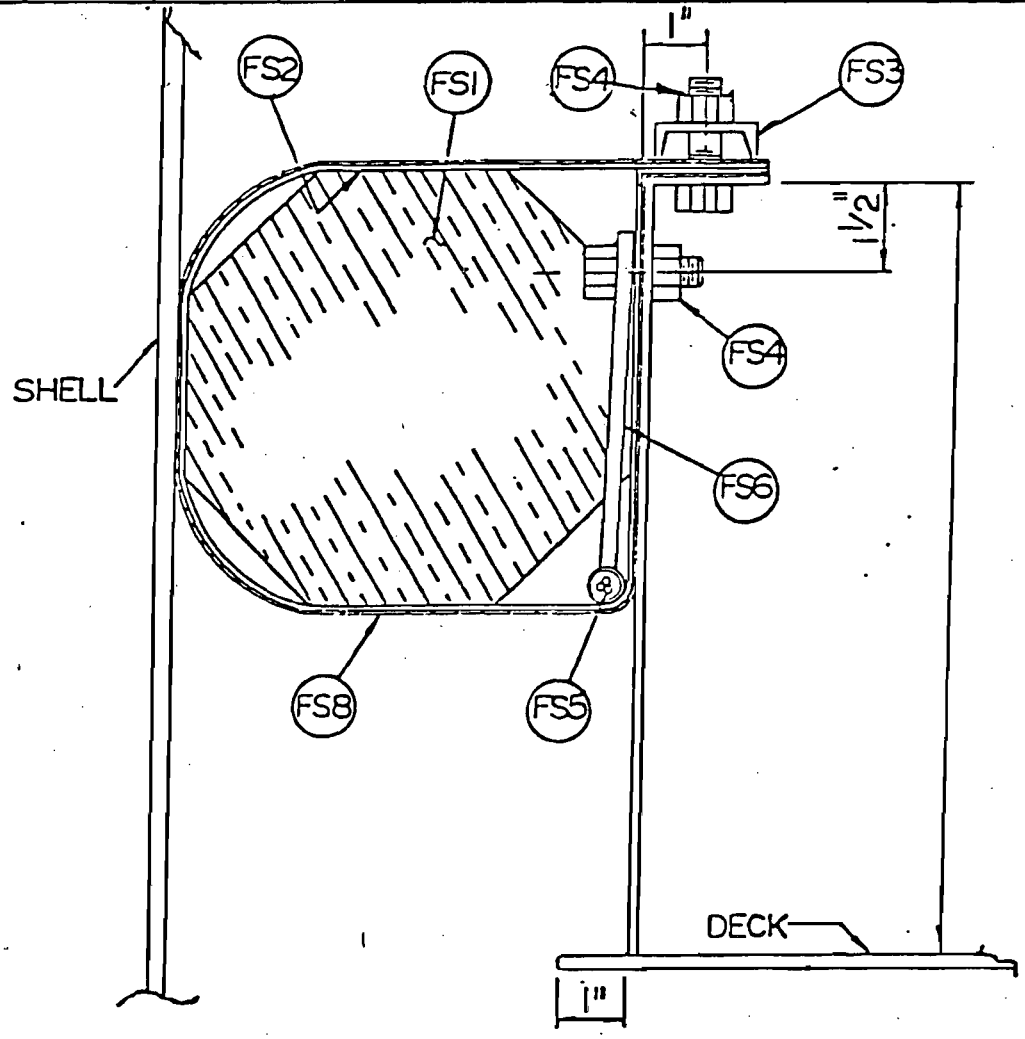
PROCEDURE

COMPANY TANK SERVICE, INC.

TITLE

DATA FOR PRIMARY FOAM PAC
BILL OF MATERIAL FOR
HORIZONTAL RIM PLATE

MK.	QUAN.	MK.	QUAN.	DESCRIPTION	PT. NO
FS1				LIN.FT. OCTAGONAL FOAM LOG	
FS2				LIN.FT. WIDE URETHANE SEAL FABRIC	
FS3				C 1½"X½"X⅛"X 0'-7¾"	
FS4				⅜"ØX1½" MB W/ NUTS (CAD. PL.)	
FS5				LIN.FT. ¼" WIRE ROPE (S.S.)	
FS6				CABLE HOLD-DOWNS X	
FS7	2			¼" CABLE CLAMPS (S.S.)	
FS8				PL. 2" X 26 GA. X (S.S.)	
FS9	1			REEVES 2265 GLUE KIT	



PROCEDURE

COMPANY TANK SERVICE, INC.

CATEGORY	NUMBER
FIELD INSTALLATION	1.03

TITLE

SINGLE MINI-PAC (TS-4)

HORIZONTAL RIM R. ATTACHMENT

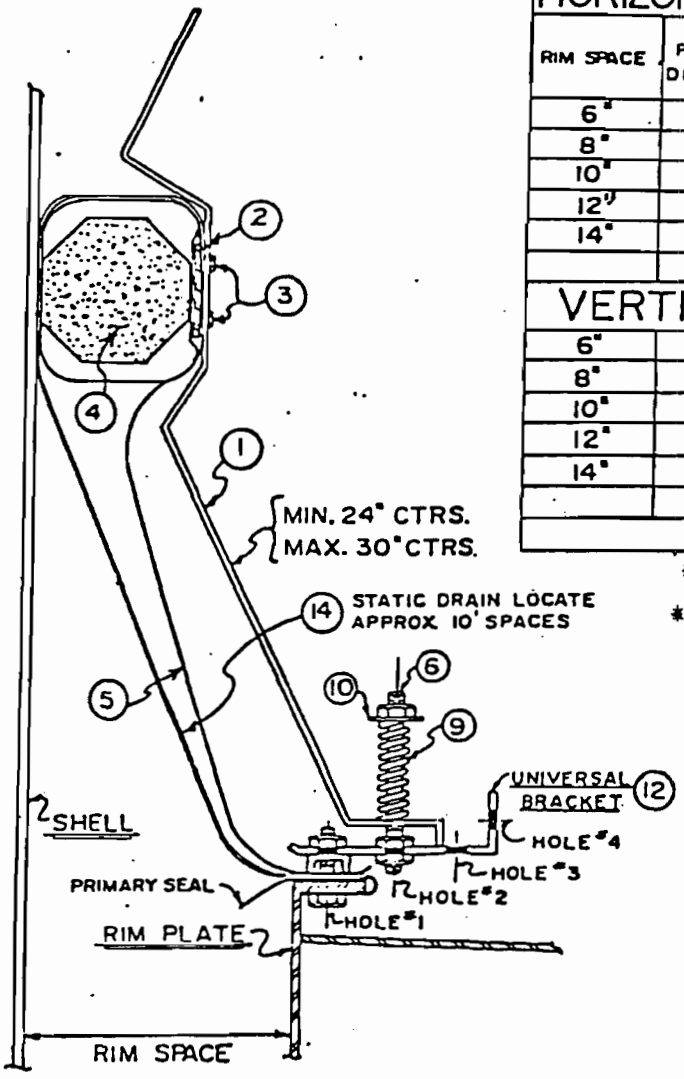
RIM SPACE	POSITION DESCRIPTION	UNIVERSAL BRACKET HOLE N° TO RIM R. HOLE	UNIVERSAL BRACKET HOLE N° TO STUD	SKIRT WIDTH	STATIC DRAIN LENGTH
6"	N°1	N°1	N°2	19"	34"
8"	N° 1	N°1	N°2	19"	34"
10"	N°2	N°1	N°1	21"	36"
12"	N°3	N°2	N°1	23"	38"
14"	N°4	N°3	N°1	25"	40"

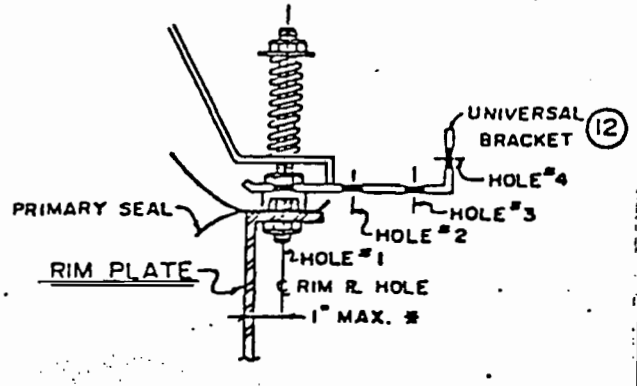
VERTICAL RIM R. ATTACHMENT

6"	N°5	N°4	N°2	19"	34"
8"	N°5	N°4	N°2	19"	34"
10"	N°6	N°4	N°3	21"	36"
12"	N°7**	N° 2**	N°2	23"	38"
14"	N°8**	N°3**	N°1	25"	40"

* WHEN THIS DIM. IS EXCEEDED, THE MAXIMUM RIM SPACE SHOULD BE ADJUSTED ACCORDINGLY.

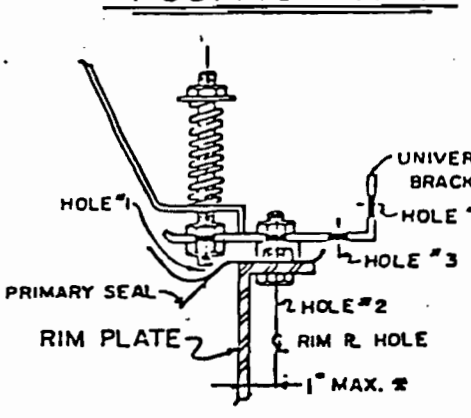
** POSITION Nº 7 & 8 MUST USE BRACKET ADAPTER (13)



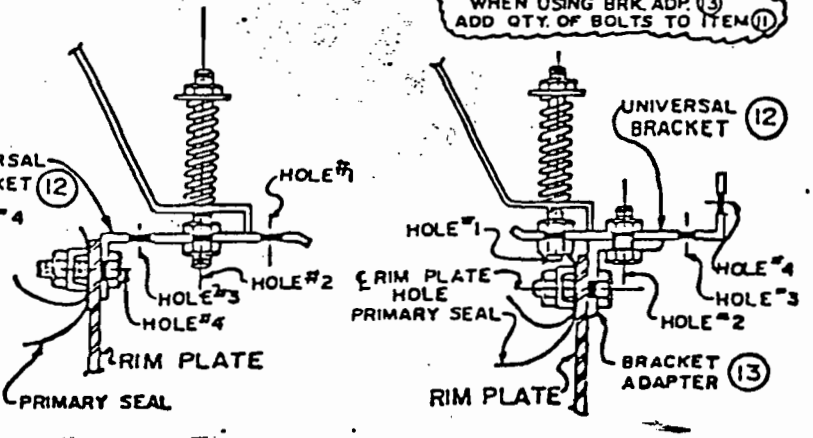


POSITION Nº2

POSITION Nº 1



NOTE: WHEN USING BRK. ADP. (13) ADD QTY. OF BOLTS TO ITEM (11)



POSITION Nº 3&4 POSITION Nº 5&6 POSITION Nº 7&8

APPROVAL	EFFECTIVE	SUPERSEDES	PAGE
	5/81	3/81	1 of 4

ATTACHMENT 4

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

August 8, 1984

CERTIFIED MAIL-RETURN REQUESTED

Mr. Albin W. Smith
President
Belcher Oil Company
Post Office Box 025500
Miami, Florida 33102-5500

Re: Completeness Review of an Application to Modify Air Pollution Sources: Permit No. AC 05-090952 (originally: AC 05-57476, -57477, -57478 and -57479)

Dear Mr. Smith:

The department has received the above referenced application package in which you requested an annual increase in gasoline throughput in the existing gasoline storage tanks Nos. 9, 15, 17 and 18 (facility identification numbers) and to depermit gasoline storage tanks Nos. 7 and 8. The bureau finds the application package incomplete and the following information/requests will have to be submitted before further processing will resume:

1. If there is any proprietary information required in any response(s) to the following requests, please identify and submit as a separate document and the bureau will maintain confidentiality (ref. 403.111, Florida Statutes).

2. What will be the disposition of the gasoline storage tanks Nos. 7 and 8?

3. Since the potential VOC emissions increase per source will be less than 25 tons per year, a processing fee of $100.00 per source will be required. Therefore, remit a total of $400.00 on a cashiers check or money order made out to the Department of Environmental Regulation.

If there are any questions, please call Bruce Mitchell at (904) 488-1344 or write to me at the above address.

Sincerely,

Steve Smallwood P.E.,
Chief
Bureau of Air Quality
Management

CHF/BM/agh

cc: Nancy Wright
D. Thompson
R. Caldwell
Michael K. Gleman

ATTACHMENT 5

GLEMAN ENGINEERING COMPANY
324 DATURA STREET
POST OFFICE BOX 3384
WEST PALM BEACH, FLORIDA 33402
TELEPHONE (305) 655-0506

September 19, 1984

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

DER
SEP 24 1984
BAQM

Attention: Mr. Bruce Mitchell

Re: Belcher Oil Company
Port Canaveral Facility
Your: AC 05-090952
Our: 84-101-1

Gentlemen:

This letter responds to your August 8, 1984 request for additional information as follows:

1. Information contained in the following responses is not considered proprietary by Belcher Oil Company.

2. Storage Tanks #7 and #8 will be refurbished for diesel fuel storage and eventually converted to gasoline storage in response to market conditions. These tanks are not currently in use. Appropriate application for refurbishment and reactivation of these tanks will be made at a future date.

3. Enclosed herewith is a fee check payable to the DER in the amount of $400.00.

4. Enclosed herewith are completed Applications to Modify the referenced storage tanks. Please note these tanks were previously permitted under original permit #'s AC 05-57476, -57477, -57478 and -57479.

We trust this information is sufficient to allow permit application processing to resume. Please feel free to call should additional information be required.

Very truly yours,

Michael K. Gleman, P.E.
President

cc: Mr. Tommy Green (w/o enc.)
Mr. Dan E. Dudley (w/o enc.)
Belcher Oil Company

Encs.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHEAST FLORIDA DISTRICT
3301 GUN CLUB ROAD
P.O. BOX 3858
WEST PALM BEACH, FLORIDA 33402

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Petroleum Storage Tanks [ ] New[1] [X] Existing[1]

APPLICATION TYPE: [ ] Construction [ ] Operation [X] Modification

COMPANY NAME: Belcher Oil Company COUNTY: Brevard

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Petroleum Storage Tanks #9, 15, 17 & 18.

SOURCE LOCATION: Street East Terminal, North Atlantic Avenue City Port Canaveral

UTM: East 753 8980 North 314 1990

Latitude 28 ° 24 ' 24 "N Longitude 80 ° 36 ' 09 "W

APPLICANT NAME AND TITLE: Belcher Oil Company, c/o Mr. Albin W. Smith, President

APPLICANT ADDRESS: P. O. Box 025500, Miami, FL 33102-5500

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Belcher Oil Company

I certify that the statements made in this application for an Existing Source permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Albin W. Smith

Albin W. Smith, President
Name and Title (Please Type)

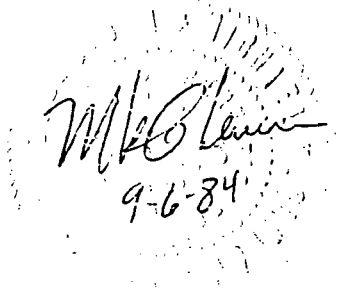
Date: _____ Telephone No. (305) 551-5223

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed M K Gleman

Michael K. Gleman, P.E.
Name (Please Type)

Gleman Engineering Company
Company Name (Please Type)

P.O. Box 3384, West Palm Beach, FL 33402
Mailing Address (Please Type)

Florida Registration No. 23175 Date: 9-6-84 Telephone No. (305) 655-0506

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Tanks 9, 15, 17 and 18 are existing petroleum storage tanks previously permitted as indicated below. Project will result in full compliance.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction N/A Completion of Construction N/A

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC 05-57476 AC 05-57479

AC 05-57477

AC 05-57478

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr N/A ; if seasonal, describe: N/A

F. If this is a new source or major modification, answer the following questions. (Yes or No) N/A

1. Is this source in a non-attainment area for a particular pollutant? _____

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. _____

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. _____

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? _____

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? _____

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NO

   a. If yes, for what pollutants? _____

   b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable: NOT APPLICABLE

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

B. Process Rate, if applicable: (See Section V, Item 1) NOT APPLICABLE

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
V.O.C.	5.51	24.12			5.51	24.12	---
NOTE: These emissions are for tanks #9, 15, 17 & 18. Calculations are in							
accordance with AP-42.							

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4) NOT APPLICABLE

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels NOT APPLICABLE

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

_____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average N/A Maximum N/A

G. Indicate liquid or solid wastes generated and method of disposal. N/A

_____

_____

_____

_____

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack): --N/A--

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION NOT APPLICABLE

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Patholog-ical)	Type V (Liq.& Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Inciner-ated							
Uncon-trolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubber [ ] Afterburner

[ ] Other (epecify) _____

Brief description of operating characteristics of control devices: _____

_____

_____

_____

_____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

_____

_____

_____

_____

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)] --N/A--

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY NOT APPLICABLE

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

[ ] Yes [ ] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

[ ] Yes [ ] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:
2. Operating Principles:
3. Efficiency:*
4. Capital Costs:

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height: ft.

b. Diameter: ft.

c. Flow Rate: ACFM

d. Temperature: °F.

e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

[1]Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ ( ) SO_2* _____ Wind spd/dir

Period of Monitoring _____/_____/_____ to _____/_____/_____
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling --N/A--

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used --N/A--

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data --N/A--

Pollutant	Emission Rate	
TSP	_____	grams/sec
SO^2	_____	grams/sec

E. Emission Data Used in Modeling --N/A--

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review. --N/A--

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources. --N/A--

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other competent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT 6

GLEMAN ENGINEERING COMPANY

324 DATURA STREET

POST OFFICE BOX 3384

WEST PALM BEACH, FLORIDA 33402

TELEPHONE (305) 655-0506

September 21, 1984

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Attention: Mr. Bruce Mitchell

Re: Belcher Oil Company
Port Canaveral Facility
Your: AC 05-090952
Our: 84-101-1

Gentlemen:

This letter confirms verbal information provided to your office during several telephone conversations on September 20, 1984 relating to ethanol throughput at the South Loading Rack for the referenced facility.

Maximum throughput is estimated to be 250,000 gallons per month average. This throughput equates to a total estimated throughput of 3,000,000 gallons (17,429 BBLS) per year maximum. Current throughputs are below this projected maximum and are averaging approximately 175,000 gallons per month. Based upon this 250,000 gallon per month figure, we estimate emissions from the VRU controlling this alcohol dispenser to be 42.58 lbs/YR (.019 lb/HR = .021 T/YR) maximum. Calculations per AP-42 are attached.

Additionally, please consider this alcohol throughput in addition to the currently permitted 3.6 million barrels per year throughput for gasoline.

Your assistance during this permitting process has been appreciated. Please feel free to call regarding any question or need for additional information.

Very truly yours,

Michael K. Gleman, P.E.
President

Enc.
cc: Mr. Dan E. Dudley - Belcher Oil
Mr. Bruce Smith, Jr. - Ethanol Corp.

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB DER PERMITS
SHEET NO. 1 OF 1
CALCULATED BY MKG DATE SEPT '84
CHECKED BY DATE
SCALE 84-101-1 BELCHER OIL - CANAVER

EMISSION CALCS PER AP-42

FOR ALCOHOL DISPENSER @ SOUTH LOADING RACK

$$L_L = 12.46 \left[\frac{SPM}{T}\right]\left[1 - \frac{eff.}{100}\right]$$

WHERE L_L = LOADING LOSS / 10^3 GAL.

S = SATURATION FACTOR
= 0.6 SUBMERGED LOADING, DEDICATED

P = TRUE VAPOR PRESS
= 1.1 PSIA @ 75°F

M = MOLECULAR WEIGHT
= 46

T = TEMP. °R

$$\therefore L_L = 12.46 \left[\frac{0.6\,(1.1)(46)}{533}\right]\left[1 - \frac{98}{100}\right] = .014194$$

$$= 0.014194 \text{ lbs} / 1000 \text{ GAL.}$$

FOR 3,000,000 GAL/YR (250,000 GAL/MONTH MAX):

$$L_L = 0.014194\,(3{,}000{,}000) \div 1{,}000 = 42.58 \text{ lbs/YR}$$

L_L = 42.58 lbs/YR = .021 T/YR = .019 lbs/HR MAX.

ATTACHMENT 7

DER

OCT 8 1984

BAQM

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTION 120.60(2), FLORIDA STATUTES

License (Permit, Certification) Application No. AC 05-090952
AC 05-092822

Applicant's Name: Belcher Oil Company

The undersigned has read Section 120.60(2), Florida Statutes, and fully understands the Applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the Applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Section 120.60(2), Florida Statutes, waives the right under Section 120.60(2), Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Section 120.60(2), Florida Statutes. Said waiver is made freely and voluntarily by the Applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 9th day of December 1984.

The undersigned is authorized to make this waiver on behalf of the applicant.

Albin W. Smith
Signature

Albin W. Smith, President
Name of Signee

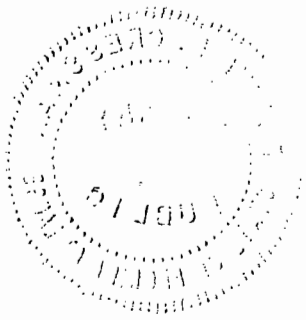
October 2, 1984
Date

Sworn to and subscribed before me this 02 day of October 19 84.

Bonnie L Creasman
NOTARY PUBLIC, STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES OCT. 26 1984
BONDED THRU GENERAL INS. UNDERWRITERS

Section 120.60, Florida Statutes

(2) When an application for a license is made as required by law, the agency shall conduct the proceedings required with reasonable dispatch and with due regard to the rights and privileges of all affected parties or aggrieved persons. Within 30 days after receipt of an application for a license, the agency shall examine the application, notify the applicant of any apparent errors or omissions, and request any additional information the agency is permitted by law to require. Failure to correct an error or omission or to supply additional information shall not be grounds for denial of the license unless the agency timely notified the applicant within this 30 day period. The agency shall notify the applicant if the activity for which he seeks a license is exempt from the licensing requirement and return any tendered application fee within 30 days after receipt of the original application or within 10 days after receipt of the timely requested additional information or correction of errors or omissions. Every application for license shall be approved or denied within 90 days after receipt of the original application or receipt of the timely requested additional information or correction of errors or omissions. Any application for a license not approved or denied within the 90-day period or within 15 days after conclusion of a public hearing held on the application, whichever is latest, shall be deemed approved and, subject to the satisfactory completion of an examination, if required as a prerequisite to licensure, [2](the license) shall be issued. The Public Service Commission, when issuing a license, and any other agency, if specifically exempted by law, shall be exempt from the time limitations within this subsection. Each agency, upon issuing or denying a license, shall state with particularity the grounds or basis for the issuance or denial of same, except where issuance is a ministerial act. On denial of a license application on which there has been no hearing, the denying agency shall inform the applicant of any right to a hearing pursuant to s. 120.57.



ATTACHMENT 8

GLEMAN ENGINEERING COMPANY

324 DATURA STREET

POST OFFICE BOX 3384

WEST PALM BEACH, FLORIDA 33402

TELEPHONE (305) 655-0506

October 18, 1984

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

DER

OCT 22 1984

BAQM

Attention: Mr. Bruce Mitchell

Re: Belcher Oil Company
Port Canaveral Facility
Your: AC 05-~~090952~~ 094507
Our: 84-101-1

Gentlemen:

As discussed by phone, this letter confirms that Belcher Oil Company is planning to renovate Storage Tank #7 (nominal 55,000 BBLS capacity) in the near future. It is anticipated that work on this tank will begin as soon as a permit can be secured and completed within several months thereafter. Upon completion of this work, the tank will be used as a fixed roof tank.

Annual throughput is estimated to be 811,000 BBLS. This throughput will be in addition to the currently permitted diesel throughput for Tanks #1, 12 and 13. Total estimated emissions from Tank #7 is 2,179.98 lbs/Yr (1.09 T/Yr) of which 1,226.24 lbs/Yr (.61 T/Yr) is breathing loss and 953.74 lbs/Yr (.48 T/Yr) is working loss. Calculations per AP-42 are enclosed.

We understand that this renovation of Tank #7 can be included in the current construction permitting review being conducted by your office. Please feel free to call regarding any question or need for additional information.

Very truly yours,

Michael K. Gleman, P.E.
President

MKG/lm
Enc.

cc: Mr. Dan E. Dudley - Belcher Oil Company
Roger Caldwell - 10/23/84

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB 84-101-1
SHEET NO. 1 OF 2
CALCULATED BY MLG DATE Oct '84
CHECKED BY DATE
SCALE BELCHER OIL - PORT CANAVERAL

EMISSION CALCULATIONS
STORAGE TANK #7 - FIXED ROOF
100' ϕ x 40' HEIGHT

[1] BREATHING LOSSES:

$$L_B = 2.26 \times 10^{-2} M \left[\frac{P}{14.7 - P}\right]^{.68} D^{1.73} H^{.51} \Delta T^{.50} F_P C K_C = \text{lbs/YR}$$

WHERE M = MOLECULAR WEIGHT = 130

P = TRUE VAPOR PRESS. = .0090

D = TANK DIAMETER = 100

H = AVG. VAPOR SPACE HEIGHT WITH ROOF CORRECTION = 21.39

ΔT = AVG. DIURNAL TEMP. CHANGE = 11.0 (79° - 68° PER NOAA CLIMATOLOGICAL DATA)

F_P = PAINT FACTOR = 1.40 (medium grey)

C = SMALL TANK ADJUSTMENT FACTOR = 1.0

K_C = PRODUCT FACTOR = 1.0

$$L_B = 2.26 \times 10^{-2} [130] \left[\frac{.0090}{14.7 - .009}\right]^{.68} [100]^{1.73} [21.39]^{.51} [11]^{.50} [1.4][1.0][1.0]$$

$$L_B = \underline{1,226.24 \text{ lbs/YR} = .61 \text{ T/YR.}}$$

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB 84-101-1
SHEET NO. 2 OF 2
CALCULATED BY MKG DATE
CHECKED BY DATE
SCALE BELCHER OIL - PORT CANAVERAL

[2] WORKING LOSSES:

$$L_W = 2.40 \times 10^{-2} M P K_N K_C$$

WHERE M = MOLECULAR WEIGHT = 130

P = TRUE VAPOR PRESS. = .0090

K_N = TURNOVER FACTOR = 1.0 FOR 15 TURNOVERS ±

K_C = PRODUCT FACTOR = 1.0

$$L_W = 2.40 \times 10^{-2} (130)(.0090)(1.0)(1.0) \text{ lbs}/1000 \text{ GAL}$$

$$= .028 \text{ lbs}/1000 \text{ GAL.}$$

FOR 811,000 BBLS = 34,062,000 GAL.

$$\therefore L_W = .028/1000 \text{ GAL} \times 34,062,000$$

$$= \underline{953.74 \text{ lbs}/\text{YR}}$$

TOTAL LOSSES = $L_B + L_W$

$$= 1,226.24 + 953.74$$

$$= \underline{2,179.98 \text{ lbs}/\text{YR} = 1.09 \text{ T}/\text{YR}}$$

AC 05-094507

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

PERMITTEE: Belcher Oil Company
Port Canaveral Bulk Gasoline Terminal
P. O. Box 525500
Miami, Florida 33152

I.D. Number:
Permit/Certification Number: AC 05-094507
Date of Issue:
Expiration Date: December 31, 1985
County: Brevard
Latitude/Longitude: 28° 24' 20" N/80° 36' 09" W
Section/Township/Range:
Project: Renovation/conversion of the existing gasoline storage tank No. 7 to a fixed-roof diesel storage tank (No. 7)

This permit is issued under the provisions of Chapter(s) 403, Florida Statutes, and Florida Administrative Code Rule(s) 17-2 and 17-4. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the department and made a part hereof and specifically described as follows:

For the renovation/conversion of the existing gasoline storage tank No. 7 to a fixed-roof diesel storage tank at the applicant's existing bulk gasoline and petroleum storage/transfer terminal located at No. 10 Tanker Turn Road, Cape Canaveral, Florida. The UTM coordinates are Zone 17-589.9 km East and 3142.0 km North.

Construction shall be in accordance with the permit application and plans, documents, amendments, and drawings except as otherwise noted on page 4 of the "Specific Conditions."

Attachments are as follows:

1. Construction permit No. AC 05-57476 and its attachments, modifications and amendments.
2. Michael K. Gleman's letter with attachments dated April 26, 1984.
3. Albin W. Smith's letter with attachments dated June 21, 1984.
4. Steve Smallwood's letter dated August 8, 1984.
5. Michael K. Gleman's letter with DER Form 17-1.202 attached dated September 19, 1984.
6. Michael K. Gleman's letter with attachment dated September 21, 1984.
7. "Waiver of 90 day time limit" dated October 2, 1984, and signed by Albin W. Smith.
8. Michael K. Gleman's letter with attachments dated October 18, 1984.

PERMITTEE: Belcher Oil Company
Port Canaveral Bulk Gasoline Terminal
P. O. Box 525500
Miami, Florida 33152

I.D. Number:
Permit/Certification Number: AC 05-094507
Date of Issue:
Expiration Date: December 31, 1985

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the department.

3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in the permit.

4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefor caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and department rules, unless specifically authorized by an order from the department.

6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

   a. Having access to and copying any records that must be kept under the conditions of the permit;

   b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and

   c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or department rules.

   Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the department with the following information:

   a. a description of and cause of non-compliance; and

b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the non-compliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the department for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the department, may be used by the department as evidence in any enforcement case arising under the Florida Statutes or department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.

10. The permittee agrees to comply with changes in department rules and Florida Statutes after a reasonable time for compliance, provided however, the permittee does not waive any other rights granted by Florida Statutes or department rules.

11. This permit is transferable only upon department approval in accordance with Florida Administrative Code Rules 17-4.12 and 17-30.30, as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the department.

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
( ) Compliance with New Source Performance Standards

14. The permittee shall comply with the following monitoring and record keeping requirements:

a. Upon request, the permittee shall furnish all records and plans required under department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the department, during the course of any unresolved enforcement action.

b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by department rule.

c. Records of monitoring information shall include:

- the date, exact place, and time of sampling or measurements;
- the person responsible for performing the sampling or measurements;
- the date(s) analyses were performed;
- the person responsible for performing the analyses;
- the analytical techniques or methods used; and
- the results of such analyses.

15. When requested by the department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the department, such facts or information shall be submitted or corrected promptly.

PERMITTEE: Belcher Oil Company
Port Canaveral Bulk Gasoline Terminal
P. O. Box 525500
Miami, Florida 33152

I.D. Number:
Permit/Certification Number: AC 05-094507
Date of Issue:
Expiration Date: December 31, 1985

SPECIFIC CONDITIONS:

1. Construction/installation should reasonably conform to the application, plans, documents, and amendments submitted.

2. The applicant should report any delays in construction/installation and completion to the DER's St. Johns River District office.

3. Annual hours of operation will be 8760.

4. Objectionable odors shall not be allowed on off-plant property.

5. If not existing, a containment dike/berm shall be erected around the storage tank No. 7 to contain spills, leaks, etc., to prevent ground-water contamination, and to aid in the clean-up of spills, leaks, etc. and prevent excess odors that could occur from the vaporization of the volatile organic compounds (VOC). If any spills, leaks, etc. occur, the DER's St. Johns River District office shall be promptly notified.

6. Expected diesel throughput of the petroleum storage tank (PST) No. 7 and the projected potential VOC emissions are:

Source	Dimensions feet	Capacity barrels	Product Stored	Throughput bbls/yr	VOC Emissions lbs/yr
PST #7	100Ø X 40	55,000	Diesel	811,000	2,180

Note: Ø represents the diameter x Height.

7. Since the VOC emissions from the source referenced in #6 are considered to be area-wide (facility) emissions, compliance verification shall be by periodic visual inspections of the equipment used to store/transfer the petroleum product. The visual inspections shall be conducted by the DER's St. Johns River District office. Any corrective action shall be concurred with the District office.

8. Annual operating reports shall be submitted to the DER's St. Johns River District office or its designee and shall be due on January 14 of each calendar year. This report shall contain records of the gasoline throughput.

9. The applicant will demonstrate compliance with the conditions of the construction permit and submit a complete application for an operating permit to the DER's St. Johns River District office prior to 90 days of the expiration date of the construction permit. The permittee may continue to operate in compliance with all terms of the construction permit until the expiration date or issuance of an operating permit.

Issued this _____ day of _____, 19__

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

_____

_____Attachments

ATTACHMENT 1

ATTACHMENT 1

Available Upon Request.

ATTACHMENT 2

GLEMAN ENGINEERING COMPANY
324 DATURA STREET
POST OFFICE BOX 3384
WEST PALM BEACH, FLORIDA 33402
TELEPHONE (305) 655-0506

April 26, 1984

State of Florida
Department of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Attn: Mr. Roger Caldwell

Re: Brevard County - AP
Belcher Oil Company
VRU Testing Program
Our: 84-101-1

Gentlemen:

Thank you for meeting with us on April 19, 1984 to review the VRU Test Results for the referenced facility and to discuss the operation conditions for the anticipated permit in general terms. We regret any misunderstanding regarding the original purpose of this meeting.

As discussed, we understand the DER will consider issuing an Operation Permit that will allow for the following operating conditions:

1. An allowable emission rate of 35 mg/l conforming to current regulatory requirements. Enclosed are calculations showing total emissions will remain under 100 T/Yr for this 35 mg/l rate.

2. An allowable maximum gasoline loading flow rate of 25,850 GPH average over any 24-hour period. This flow being equal to the test flow rate of 19,387 GPH divided by the 75% of maximum requirement outlined in EPA test procedures.

3. An allowable "peak" gasoline flow rate of 68,000 GPH provided the 25,850 GPH average is not exceeded. This 68,000 GPH flow rate corresponds to the flow rate originally permitted for this VRU.

   Additionally, this 68,000 GPH flow rate was actually tested between 8:40 A.M. and 8:55 A.M. the morning of the test. Total flow for this 15-minute interval was 17,350 gallons with an average emission rate of 1.5 mg/l. Extrapolating this 15-minute interval to an hour yields a flow of 69,400 GPH.

   Data for this test interval is shown in the truck data sheets and computer print-out summary in the test report. Calculations verifying these conditions will follow within several days.

Because of the restrictive nature some of these questions could have on Belcher Oil Company's business at this facility, we trust the DER will give every consideration in reviewing these items.

Again, we appreciate your cooperation and efforts to resolve these questions. We are ready to answer any questions or review these items via telephone or in person in order to reach a successful conclusion. Please feel free to call if you have any questions.

Very truly yours,

GLEMAN ENGINEERING COMPANY

Michael K. Gleman, P.E.
President

MKG/ms

cc: Mr. Troy Dalton - Belcher Oil

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB 94-101-1
SHEET NO 1 OF 2
CALCULATED BY MKG DATE APR '94
CHECKED BY DATE
SCALE PORT CANAVERAL - BELCHER C

EMISSION CALCULATIONS

SHOWING 35 mg/l VOC EMISSION FROM VRU
RESULTS IN LESS THAN 100 T/YR
TOTAL EMISSIONS

1. CURRENT PERMITTED
TANK EMISSIONS - GASOLINE VOC: 144,041 lbs/YR = 72.04 T

2. CURRENT PERMITTED
VRU EMISSIONS: 15.06 from limit = 15.06

CURRENT PERMITTED TOTAL: 87.10

3. NEW VRU EMISSIONS FOR 35 mg/l.

AND 68,000 GPH = MAXIMUM FLOW RATE:

A. TOTAL # OF ACTUAL PUMPING HRS/YR =

$$\left[3.6 \times 10^6 \text{ BBLS} \times 42 \text{ GAL./BLL}\right] \div 68{,}000 \text{ GPH} = 2224 \text{ HRS/YR}$$

B. ALLOWABLE EMISSIONS AT 80 mg/l. = L_L

$$L_L = \left[80 \text{ mg/l}\right]\left[3.785 \text{ l/gal.}\right]\left[\frac{1\text{b}}{454{,}592 \text{ mg}}\right]\left[68000 \text{ GPH}\right]$$

$$= 45.3 \text{ lbs/hr}$$

C. ∴ ALLOWABLE EMISSIONS AT 35 mg/l =

$$\left[35/80\right]\left[45.3\right] = 19.82 \text{ lbs/hr.}$$

D. TOTAL ANNUAL EMISSIONS AT 35 mg/l:
19.82 lbs/hr × 2224 = 22.04 T/YR.

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB C-101-1
SHEET NO 2 OF 2
CALCULATED BY MKG DATE APR '84
CHECKED BY DATE
SCALE PORT CANAVERAL - BELCHER OIL

3. CONT.

E. TOTAL ADDITIONAL VRU EMISSIONS FOR 35 mg/l RATE:

22.04	NEW
14.93	EXIST'G - PERMITTED
7.11	ADDITIONAL T/YR

4. SUMMARY:

A.	CURRENT PERMITTED TOTAL:	87.10 T/YR
B.	ADDITIONAL EMISSIONS FOR 35 mg/l RATE:	7.11 T/YR
	NEW TOTAL	94.21 T/YR

ATTACHMENT 3

R.C AC 05-090952 CML C

RG

Belcher

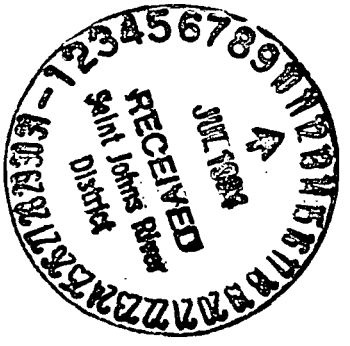
DER

BAQM

ALBIN W. SMITH
PRESIDENT

June 21, 1984

State of Florida
Department of Environmental Regulation
St. Johns River District
3319 Maguire Boulevard
Orlando, Florida 32803



Attention: Mr. Roger Caldwell

Re: Belcher Oil Company Terminal
Port Canaveral, Florida

Gentlemen:

This letter is a request for modifications to certain existing air pollution operation permits for the referenced facility. These modifications slightly increase emissions from Tanks no. 9, 17 and 18 and significantly reduce emissions from Tank no. 15. The affected permits are as follows:

AC-05-57476
AC-05-57477
AC-05-57478
AC-05-57479

The enclosed explanations, calculations and supporting data for this request were prepared by our consultant, Gleman Engineering Company.

Please feel free to contact us or our consultant should you have any questions concerning this request.

Sincerely,

BELCHER OIL COMPANY

Albin W. Smith
President

AWS:bc
Attachment

GLEMAN ENGINEERING COMPANY
324 DATURA STREET
POST OFFICE BOX 3384
WEST PALM BEACH, FLORIDA 33402
TELEPHONE (305) 655-0506

June 20, 1984

State of Florida
Department of Environmental Regulation
St. Johns River District
3319 Maguire Blvd., Suite 232
Orlando, Florida 32803-3767

Attention: Mr. Roger Caldwell

Re: Brevard County - AP
Belcher Oil Company
Gasoline Loading Racks
Your: A005-85950 (SLR "A" & "B")
A005-57476 (Tank 7)
A005-57477 (Tanks 8 & 9)
A005-57478 (Tank 15)
A005-57479 (Tanks 17 & 18)
Our: 84-101-1

Gentlemen:

This letter responds to your June 5, 1984 request for additional information as follows:

1. The total yearly facility VOC emissions figure of 99.71 T/yr includes all sources owned by Belcher Oil Company at this facility except the Asphalt Heaters that contribute an additional .025 T/yr. However, all previous emission totals contained an erroneous emission rate of 68.15 T/yr (136,301 lbs/yr) for Tank #15. This excessively high emission rate was a result of using incorrect seal factors for this tank during permitting in 1982. New calculations are enclosed that show an actual emission rate of 21.30 T/yr.

   Additionally, since Tanks #7 & 8 are not being operated or permitted at this time, we have adjusted throughputs and corresponding emissions for the remaining tanks proportionately to maintain the current permitted throughput for the VRU at 3,600,000 BBLS/Yr.

   These corrections and adjustments result in a new emission total for the entire facility of 51.46 T/yr. Total permitted gasoline throughputs will remain unchanged.

   Because of these adjustments, we feel modifications to the existing permits for the affected tanks are warranted at this time. Calculations and supporting data are enclosed.

- continued -

2. See Attachment "A" enclosed herewith for a list of all sources and related VOC emissions for this facility.

We trust this information is sufficient to allow issuance of an Operating Permit for the gasoline loading racks and VRU and for modifications to existing permits for the referenced tankage permits. Please feel free to call should you require additional information.

Very truly yours,

GLEMAN ENGINEERING COMPANY

Michael K. Gleman, P.E.
President

MKG/lm

cc: Mr. Tommy Green - Belcher Oil

Enc.

ATTACHMENT "A" - Page 1

Belcher Oil Company

Port Canaveral Terminal

Total Product Emissions

Source	Losses lbs/yr			
	Breathing/ Standing	Working/ Withdrawal	Loading	Total
Tanks 9,15,17,18 and SLR "A" & "B"	48,004	235	44,343	92,582 (46.29)
Tanks 1-6/10-14 and North Loading Rack	8,025	1,546	709	10,280 (5.14)
Asphalt Heaters	-----	-----	-----	50 (.025)
Totals - lbs/yr	56,029	1,781	45,052	102,912
- (T/yr)	(28.02)	(.89)	(22.53)	(51.46)

NOTE:

1. Tanks 7 & 8 not used and therefore not listed.
2. Tank 15 emissions reduced - see calculations.
3. Loading losses for SLR "A" & "B" increased to reflect 35.0 mg/l discharge rate - see A0 05-85950. Also includes loading losses of 248 lbs/yr (No. 2 Oil) and 15 lbs/yr (Jet A) previously permitted.

ATTACHMENT "A" - Page 2

Belcher Oil Company

Pt. Canaveral Terminal

Tank and Loading Rack Information

Tank No.	Type	Capacity (bbl)	Product	Dimensions (f
#1	Cone	80,000	No. 2 Oil	120Ø X 40
#2	Cone	55,000	No. 6 Oil	100Ø X 40
#3	Cone	35,000	Jet A	80Ø X 40
#4	Cone	20,000	AC-20	60Ø X 40
#5	Cone	1,200	AC-20	19Ø X 24
#6	Cone	20,000	AC-20	60Ø X 40
#7	Internal Float	55,000	Not Used	100Ø X 40
#8	Internal Float	35,000	Not Used	80Ø X 40
#9	Internal Float	35,000	Gasoline	80Ø X 40
#10	Cone	3,000	RC-70	30Ø X 24
#11	Cone	3,000	RC-70	30Ø X 24
#12	Cone	9,000	No. 2 Oil	40Ø X 40
#13	Cone	9,000	No. 2 Oil	40Ø X 40
#14	Cone	1,500	AC-20	21Ø X 24
#15	Ext. Float	55,000	Gasoline	100Ø X 40
#17	Internal Float	100,000	Gasoline	143Ø X 42
#18	Internal Float	100,000	Gasoline	143Ø X 42

Loading Rack Positions:

South	North
SLR "A"	2 Diesel
SLR "B"	1 Bunker
	1 Asphalt
	1 Jet Kerosene

Notes: (1) No Tank 16

ATTACHMENT "A" - Page 3

Belcher Oil Company

Cape Canaveral Terminal Product Emissions

Breathing and Working Losses

(Tanks 1-6 and 10-14)

Tank	Product	Capacity (bbls)	Throughout (bbls/yr).	Losses (lbs/yr)		
				Breathing	Working	Tota
1	No. 2	80,000	662,040	1620	781	2401
2	No. 6	55,000	366,000	57	4	61
3	Kerosene	35,000	84,000	906	121	1027
4	*AC-20	20,000	86,183	-	-	-
5	*AC-20	1,200	5,171	-	-	-
6	*AC-20	20,000	86,183	-	-	-
10	RC-70	3,000	6,000	2486	232	2718
11	RC-70	3,000	6,000	2486	232	2718
12	No. 2	9,000	74,480	235	88	323
13	No. 2	9,000	74,480	235	88	323
14	*AC-20	1,500	6,463	-	-	-
				8,025	1,546	9,57

NOTE:
Emissions not calculated for AC-20 asphalt product due to extremely low vapo pressure.

Emissions on this page currently permitted - see AC 05-62236

Gasoline Storage Tank Information
-Summary of Standing/Withdrawal Emissions-

Tank	Type	Capacity (bbls)	Dimensions (ft)	Throughput (bbls/yr)	Losses (lbs/yr)		
					Standing	Withdrawal	Total
7	int float	55,000*	100ø X 40	-0- (not used)	-0- (not used)	-0- (not used)	-0-
8	int float	35,000*	80ø X 40	-0- (not used)	-0- (not used)	-0- (not used)	-0-
9	int float	35,000	80ø X 40	434,491	1,195	43	1,238
15	ext float	55,000	100ø X 40	682,797	42,537	54	42,591
17	int float	100,000	143ø X 42	1,241,356	2,136	69	2,205
18	int float	100,000	143ø X 42	1,241,356	2,136	69	2,205
-	-	290,000*	-	3,600,000	48,004	235	48,239

Note: (1) Tanks 7 and 8 not intended for usage or permitting at this time.
(2) Tank 15 emissions reduced - see calculations.
(3) Throughputs for remaining tanks (9-15-17-18) proportionately increased to maintain total throughput of 3,600,000 BBLS/YR.
(*) Storage capacities for Tanks 7 & 8 not included in total capacity for facility.

ATTACHMENT "A" - Page 5

Belcher Oil Company

Cape Canaveral Terminal Product Emissions

North Loading Rack - Loading Losses

Product	Emissions		Potential Emissions	
	Maximum Hourly (lbs/hr)	Actual Annual (T/yr)	Maximum Hourly (lbs/hr)	Potential Annual (T/yr)
No. 2 Oil	1.24	0.19	1.24	0.19
No. 6 Oil	0.005	0.03	0.005	0.03
Jet Kerosene	0.74	0.001	0.74	0.001
RC-70	18.30	0.14	18.30	0.14
	20.3	0.36	20.3	0.36

ATTACHMENT "A" - Page 6

Belcher Oil Company

Cape Canaveral Terminal

Product Emissions Summary

(Tanks 1-6 and 10-14 and North Loading Rack)

Losses	(lbs/yr)
Breathing	8,025
Working	1,546
Loading	709
Total Hydrocarbon Losses =	10,280 lbs/yr
	5.14 T/yr

NOTE:
These emissions currently permitted - see AC 05-62236

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB [illegible]
SHEET NO. 1 OF 4
CALCULATED BY JAG DATE JUNE '84
CHECKED BY DATE
SCALE BELCHER OIL - PORT CANAVERAL

EMISSION CALCULATIONS
STORAGE TANKS 9 - 15 - 17 - 18

II BACKGROUND DATA:

	CURRENT PERMITTED THROUGHPUT		NEW THROUGHPUT	
TANK # 7	521,053	BBLS/Yr.	- 0 -	
8	331,579		- 0 -	
9	331,579		434,491	BBLS/YR.
15	521,053		682,797	
17	947,368		1,241,356	
18	947,367		1,241,356	
TOTAL	3,600,000		3,600,000	

	CURRENT PERMITTED EMISSIONS		NEW EMISSIONS	
Tank # 7	1,534	lbs/Yr.	- 0 -	
8	1,228		- 0 -	
9	1,228		1,238	lbs/Yr.
15	136,301		42,591	
17	2,189		2,205	
18	2,189		2,205	
	144,415		48,239	

III CLIMATOLOGICAL DATA:

T_{Avg} = 79° F MAX

T_{Avg} = 68° F MIN.

T_{Avg} = 73° F MEAN

V = 8.1 MPH

SOURCE: NOAA FOR PATRICK AFB (COCOA BEACH).

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB

SHEET NO. 2 OF 4

CALCULATED BY MKG DATE JUNE '81

CHECKED BY DATE

SCALE BELCHER OIL - PORT CANAVERAL

[3] STANDING STORAGE LOSSES:

$$L_s = K_s V^N P^* D M_v K_c E_F \quad (lbs/Yr)$$

K_s = SEAL FACTOR
V = AVG. WIND VELOCITY
N = SEAL RELATED WIND SPEED EXPONENT
P^* = VAPOR PRESSURE FUNCTION
D = TANK DIAMETER
M_V = VAPOR MOLECULAR WEIGHT
K_C = PRODUCT FACTOR
E_F = SECONDARY SEAL FACTOR
P_A = ATMOS. PRESSURE (PSIA)

TANK #9: INTERNAL FLOAT - GASOLINE

$$L_s = (0.7)(8.1)^{0.4}(0.14)(80)(66)(1)(1)$$

$$= 1,195 \text{ lbs/yr} = 0.598 \text{ T/Yr.} - 0.14 \text{ lbs/hr.}$$

TANK #15: EXTERNAL FLOATING ROOF - GASOLINE

A. USING INCORRECT SEAL FACTORS OF $K_s = 1.2$ + $N = 2.3$ FOR VAPOR MOUNTED PRIMARY SEAL

$$L_s = (1.2)(8.1)^{2.3}(0.14)(100)(66)(1)(1)$$

$$= 136,260 \text{ lbs/Yr} - 68.13 \text{ T/Yr} - 15.6 \text{ lbs/hr.}$$

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB

SHEET NO. 3 OF 4

CALCULATED BY MKG DATE

CHECKED BY DATE

SCALE BELCHER OIL - PORT CANAVERAL

[3] STANDING STORAGE LOSSES: (cont.)

TANK #15: (cont.)

B. USING CORRECT SEAL FACTORS OF $K_s = 0.2 + N - 2.6$ FOR VAPOR MOUNTED RESILIENT SEAL W/ SECONDARY RIM SEAL

$$L_s = \langle 0.2 \rangle \langle 8.1 \rangle^{2.6} \langle 0.14 \rangle \langle 100 \rangle \langle 66 \rangle \langle 1 \rangle \langle 1 \rangle$$

$$= 42,537 \text{ lbs/yr} = 21.3 \text{ T/Yr.} = 4.86 \text{ lbs/hr.}$$

TANKS 18 + 19: INTERNAL FLOAT - GASOLINE

$$L_s = \langle 0.7 \rangle \langle 8.1 \rangle^{0.4} \langle 0.14 \rangle \langle 143 \rangle \langle 66 \rangle \langle 1 \rangle \langle 1 \rangle \quad \text{EACH}$$

$$= 2,136 \text{ lbs/Yr} = 1.068 \text{ T/Yr} = 0.24 \text{ lbs/hr.} \quad \text{EACH}$$

[4] WITHDRAWAL LOSSES:

$$L_w = \frac{\langle 0.943 \rangle \cdot Q C W_L}{D}$$

Q = AVG. THROUGHPUT
C = CLINGAGE FACTOR
W_L = LIQUID DENSITY
D = TANK DIAMETER.

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB

SHEET NO. 4 OF 4

CALCULATED BY MKG DATE JUNE '90

CHECKED BY DATE

SCALE BELCHER OIL - PORT CANAVERAL

[4] WITHDRAWAL LOSSES: (cont.)

TANK #9:

$$L_W = \frac{0.943(434,491)(.0015)(5.6)}{80}$$

$$= 43.02 \text{ lbs/Yr} = 0.022 \text{ T/Yr} = 0.005 \text{ lbs/hr.}$$

TANK #15:

$$L_W = \frac{0.943(682,797)(.0015)(5.6)}{100}$$

$$= 54.1 \text{ lbs/Yr} = 0.027 \text{ T/Yr} = 0.006 \text{ lbs/hr.}$$

TANKS 17 + 18:

$$L_W = \frac{0.943(1,241,356)(.0015)(5.6)}{143} \quad \text{EACH}$$

$$= 68.8 \text{ lbs/Yr} = .034 \text{ T/Yr} = 0.008 \text{ lbs/hr} \quad \text{EACH}$$

NOTES: ALL CALCULATIONS PER AP-42.
SEE PAGE 4, ATTACHMENT "A" FOR SUMMARY TABLE OF EMISSION CALCULATIONS.

TANK SERVICE, INC.
5 Meco Circle
Boxwood Industrial Park
Wilmington, Delaware 19804 / (302) 999-0139

May 4, 1984

Belcher Oil Company
P.O. Box 011751
Miami, Florida 33101

Attention: Mr. T. Green

Reference: T.S.I. Standard Drawings for Primary and Secondary Seals
Tank #15
Cape Canaveral, Flordia

Gentlemen:

As per our telephone conversation of Thursday, May 3, 1984, I am enclosing copies of standard drawings for foam pac primary seals and mini pac secondary seals.

The foam pac primary seal drawings cover both a horizontal attachment and a vertical attachment. The materials in both cases are the same as specified in my letter of April 30, 1984.

The Tank Service, Inc. mini pac secondary seal was installed on tank #15. Enclosed, are copies of the standard drawings for both the single mini pac for welded tanks and the double mini pac for riveted tanks. The materials used in the fabrication of these secondary seals is the same materials used in the foam pac primary seal.

If you should need further clarification of the information provided on these drawings, please call at your convenience.

Very truly yours,

TANK SERVICE, INC.

Michael E. Lee,
Manager of Construction

MEL/ams

enclosures

TANK SERVICE, INC.
5 Meco Circle
Boxwood Industrial Park
Wilmington, Delaware 19804 / (302) 999-0139

April 30, 1984

Belcher Oil Company
P.O. Box 011751
Miami, Florida 33101

Attention: Mr. Troy Dalton

Reference: Foam Seal Specifications
Tank #15
Cape Canaveral, Florida

Gentlemen:

In April of 1980, Tank Service, Inc. installed our "Foam-Pac" Primary Seal in tank #15 at your Cape Canaveral, Florida Terminal. The main components of the "Foam-Pac" Primary Seal are the foam, which seals the rim space, and the fabric that encases the foam and wears against the shell.

The foam is a prime quality polyether type urethane foam with the compression set not to exceed 10% at 75% deflection. The density of the foam is 1 to 1.2 lbs./cu.ft. and has an operating temperature range of -20°F to 200°F.

The fabric is a polyurethane on nylon, generally gold or yellow in color. The average thickness of the fabric is 0.030", generally built up thicker on the wear side of the nylon. The fabric is rated for 100% aromatics and has a maximum operating temperature of 140°F.

The balance of the materials are used to hold the seal in place and are generally made of galvanized or black carbon steel.

We hope that this information will be sufficient in your efforts to obtain the desired permits. If you should have any further questions, or if we can be of any further assistance, please call at your convenience.

Very truly yours,

TANK SERVICE, INC.

Michael E. Lee,
Manager of Construction

MEL/ams

NEED DRAWING
AND EPA INFORMATION
[illegible]

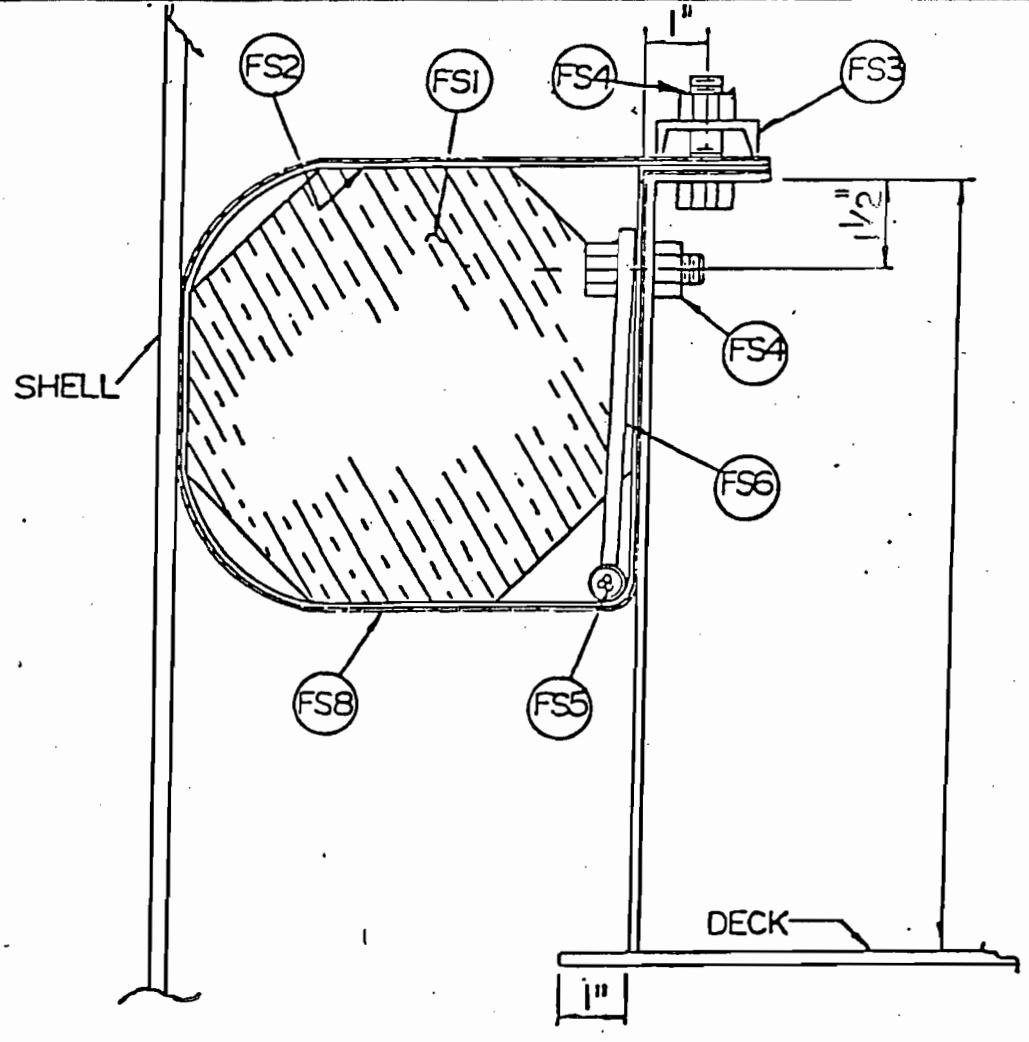
PROCEDURE

COMPANY TANK SERVICE, INC.

TITLE

DATA FOR PRIMARY FOAM PAC
BILL OF MATERIAL FOR
HORIZONTAL RIM PLATE

MK.	QUAN.	MK.	QUAN.	DESCRIPTION	PT. NO
FS1				LIN.FT. OCTAGONAL FOAM LOG	
FS2				LIN.FT. WIDE URETHANE SEAL FABRIC	
FS3				C1½"X½"X⅛"X0'-7¾"	
FS4				⅜"ØX1½" MB W/ NUTS (CAD. PL.)	
FS5				LIN.FT. ¼" WIRE ROPE (S.S.)	
FS6				CABLE HOLD-DOWNS X	
FS7	2			¼" CABLE CLAMPS (S.S.)	
FS8				PL.2"X 26GA.X (S.S.)	
FS9	1			REEVES 2265 GLUE KIT	



APPROVAL	EFFECTIVE	SUPERSEDES	PAGE
	12/81	3/81	5 of 8

PROCEDURE

COMPANY TANK SERVICE, INC.

CATEGORY	NUMBER
FIELD INSTALLATION	1.03

TITLE

SINGLE MINI-PAC (TS-4)

HORIZONTAL RIM R. ATTACHMENT

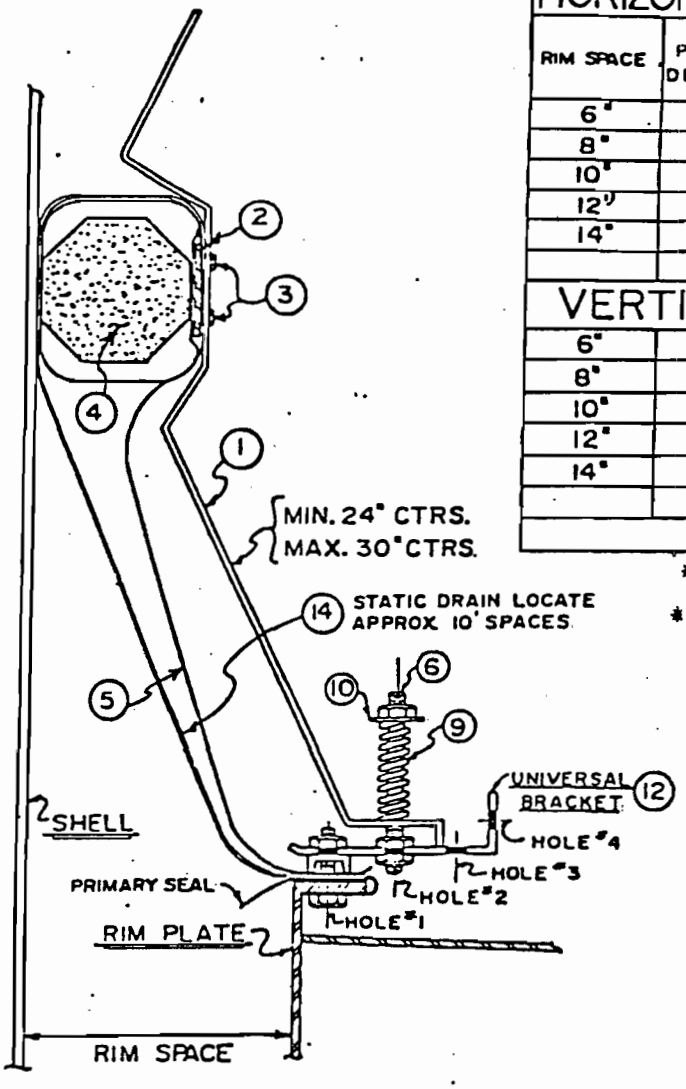
RIM SPACE	POSITION DESCRIPTION	UNIVERSAL BRACKET HOLE N° TO RIM R HOLE	UNIVERSAL BRACKET HOLE N° TO STUD	SKIRT WIDTH	STATIC DRAIN LENGTH
6"	N°1	N°1	N°2	19"	34"
8"	N°1	N°1	N°2	19"	34"
10"	N°2	N°1	N°1	21"	36"
12"	N°3	N°2	N°1	23"	38"
14"	N°4	N°3	N°1	25"	40"

VERTICAL RIM R. ATTACHMENT

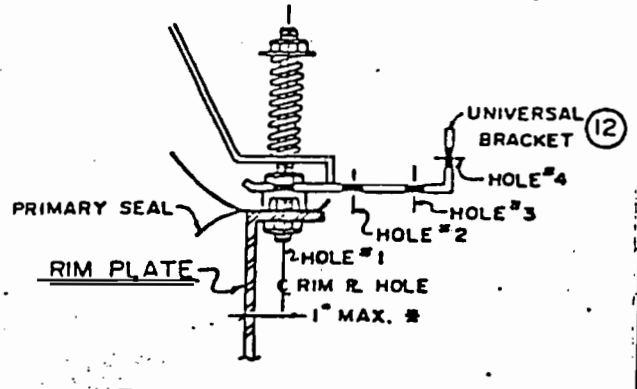
6"	N°5	N°4	N°2	19"	34"
8"	N°5	N°4	N°2	19"	34"
10"	N°6	N°4	N°3	21"	36"
12"	N°7**	N°2**	N°2	23"	38"
14"	N°8**	N°3**	N°1	25"	40"

* WHEN THIS DIM. IS EXCEEDED, THE MAXIMUM RIM SPACE SHOULD BE ADJUSTED ACCORDINGLY.

** POSITION N° 7 & 8 MUST USE BRACKET ADAPTER (13)

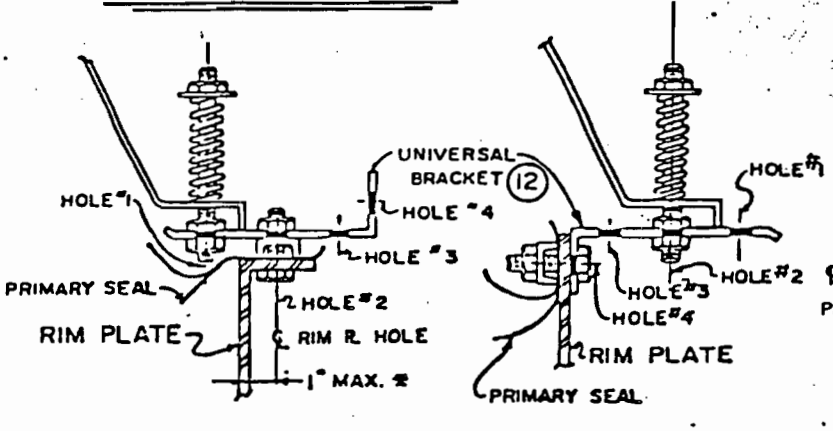


POSITION N° 1



POSITION N° 2

NOTE: WHEN USING BRK. ADP. (13) ADD QTY. OF BOLTS TO ITEM (11)



POSITION N° 3 & 4 POSITION N° 5 & 6 POSITION N° 7 & 8

APPROVAL	EFFECTIVE	SUPERSEDES	PAGE
	5/81	3/81	1 of 4

ATTACHMENT 4

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241

BOB GRAHAM
GOVERNOR

VICTORIA J. TSCHINKEL
SECRETARY

August 8, 1984

CERTIFIED MAIL-RETURN REQUESTED

Mr. Albin W. Smith
President
Belcher Oil Company
Post Office Box 025500
Miami, Florida 33102-5500

Re: Completeness Review of an Application to Modify Air Pollution Sources: Permit No. AC 05-090952 (originally: AC 05-57476, -57477, -57478 and -57479)

Dear Mr. Smith:

The department has received the above referenced application package in which you requested an annual increase in gasoline throughput in the existing gasoline storage tanks Nos. 9, 15, 17 and 18 (facility identification numbers) and to depermit gasoline storage tanks Nos. 7 and 8. The bureau finds the application package incomplete and the following information/requests will have to be submitted before further processing will resume:

1. If there is any proprietary information required in any response(s) to the following requests, please identify and submit as a separate document and the bureau will maintain confidentiality (ref. 403.111, Florida Statutes).

2. What will be the disposition of the gasoline storage tanks Nos. 7 and 8?

3. Since the potential VOC emissions increase per source will be less than 25 tons per year, a processing fee of $100.00 per source will be required. Therefore, remit a total of $400.00 on a cashiers check or money order made out to the Department of Environmental Regulation.

If there are any questions, please call Bruce Mitchell at (904) 488-1344 or write to me at the above address.

Sincerely,

Steve Smallwood P.E.,
Chief
Bureau of Air Quality
Management

CHF/BM/agh

cc: Nancy Wright
D. Thompson
R. Caldwell
Michael K. Gleman

ATTACHMENT 5

GLEMAN ENGINEERING COMPANY

324 DATURA STREET

POST OFFICE BOX 3384

WEST PALM BEACH, FLORIDA 33402

TELEPHONE (305) 655-0506

September 19, 1984

DER

SEP 24 1984

BAQM

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Attention: Mr. Bruce Mitchell

Re: Belcher Oil Company
Port Canaveral Facility
Your: AC 05-090952
Our: 84-101-1

Gentlemen:

This letter responds to your August 8, 1984 request for additional information as follows:

1. Information contained in the following responses is not considered proprietary by Belcher Oil Company.

2. Storage Tanks #7 and #8 will be refurbished for diesel fuel storage and eventually converted to gasoline storage in response to market conditions. These tanks are not currently in use. Appropriate application for refurbishment and reactivation of these tanks will be made at a future date.

3. Enclosed herewith is a fee check payable to the DER in the amount of $400.00.

4. Enclosed herewith are completed Applications to Modify the referenced storage tanks. Please note these tanks were previously permitted under original permit #'s AC 05-57476, -57477, -57478 and -57479.

We trust this information is sufficient to allow permit application processing to resume. Please feel free to call should additional information be required.

Very truly yours,

Michael K. Gleman, P.E.
President

cc: Mr. Tommy Green (w/o enc.)
Mr. Dan E. Dudley (w/o enc.)
Belcher Oil Company

Encs.

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHEAST FLORIDA DISTRICT
3301 GUN CLUB ROAD
P.O. BOX 3858
WEST PALM BEACH, FLORIOA 33402

APPLICATION TO OPERATE/CONSTRUCT AIR POLLUTION SOURCES

SOURCE TYPE: Petroleum Storage Tanks [ ] New[1] [X] Existing[1]

APPLICATION TYPE: [ ] Construction [ ] Operation [X] Modification

COMPANY NAME: Belcher Oil Company COUNTY: Brevard

Identify the specific emission point source(s) addressed in this application (i.e. Lime Kiln No. 4 with Venturi Scrubber; Peaking Unit No. 2, Gas Fired) Petroleum Storage Tanks #9, 15, 17 & 18.

SOURCE LOCATION: Street East Terminal, North Atlantic Avenue City Port Canaveral

UTM: East 753 8980 North 314 1990

Latitude 28 ° 24 ' 24 "N Longitude 80 ° 36 ' 09 "W

APPLICANT NAME AND TITLE: Belcher Oil Company, c/o Mr. Albin W. Smith, President

APPLICANT ADDRESS: P. O. Box 025500, Miami, FL 33102-5500

SECTION I: STATEMENTS BY APPLICANT AND ENGINEER

A. APPLICANT

I am the undersigned owner or authorized representative* of Belcher Oil Company

I certify that the statements made in this application for an Existing Source permit are true, correct and complete to the best of my knowledge and belief. Further, I agree to maintain and operate the pollution control source and pollution control facilities in such a manner as to comply with the provision of Chapter 403, Florida Statutes, and all the rules and regulations of the department and revisions thereof. I also understand that a permit, if granted by the department, will be non-transferable and I will promptly notify the department upon sale or legal transfer of the permitted establishment.

*Attach letter of authorization

Signed: Albin W. Smith

Albin W. Smith, President
Name and Title (Please Type)

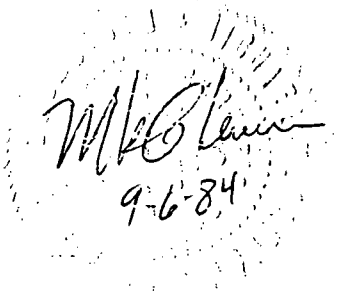
Date: _____ Telephone No. (305) 551-5223

B. PROFESSIONAL ENGINEER REGISTERED IN FLORIDA (where required by Chapter 471, F.S.)

This is to certify that the engineering features of this pollution control project have been designed/examined by me and found to be in conformity with modern engineering principles applicable to the treatment and disposal of pollutants characterized in the permit application. There is reasonable assurance, in my professional judgment, that

[1] See Florida Administrative Code Rule 17-2.100(57) and (104)

the pollution control facilities, when properly maintained and operated, will discharge an effluent that complies with all applicable statutes of the State of Florida and the rules and regulations of the department. It is also agreed that the undersigned will furnish, if authorized by the owner, the applicant a set of instructions for the proper maintenance and operation of the pollution control facilities and, if applicable, pollution sources.



Signed M K Gleman

Michael K. Gleman, P.E.
Name (Please Type)

Gleman Engineering Company
Company Name (Please Type)

P.O. Box 3384, West Palm Beach, FL 33402
Mailing Address (Please Type)

Florida Registration No. 23175 Date: 9-6-84 Telephone No. (305) 655-0506

SECTION II: GENERAL PROJECT INFORMATION

A. Describe the nature and extent of the project. Refer to pollution control equipment, and expected improvements in source performance as a result of installation. State whether the project will result in full compliance. Attach additional sheet if necessary.

Tanks 9, 15, 17 and 18 are existing petroleum storage tanks previously permitted as indicated below. Project will result in full compliance.

B. Schedule of project covered in this application (Construction Permit Application Only)

Start of Construction N/A Completion of Construction N/A

C. Costs of pollution control system(s): (Note: Show breakdown of estimated costs only for individual components/units of the project serving pollution control purposes. Information on actual costs shall be furnished with the application for operation permit.)

N/A

D. Indicate any previous DER permits, orders and notices associated with the emission point, including permit issuance and expiration dates.

AC 05-57476 AC 05-57479

AC 05-57477

AC 05-57478

E. Requested permitted equipment operating time: hrs/day 24 ; days/wk 7 ; wks/yr 52 ;

if power plant, hrs/yr N/A ; if seasonal, describe: N/A

F. If this is a new source or major modification, answer the following questions. (Yes or No) N/A

1. Is this source in a non-attainment area for a particular pollutant? _____

   a. If yes, has "offset" been applied? _____

   b. If yes, has "Lowest Achievable Emission Rate" been applied? _____

   c. If yes, list non-attainment pollutants. _____

2. Does best available control technology (BACT) apply to this source? If yes, see Section VI. _____

3. Does the State "Prevention of Significant Deterioriation" (PSD) requirement apply to this source? If yes, see Sections VI and VII. _____

4. Do "Standards of Performance for New Stationary Sources" (NSPS) apply to this source? _____

5. Do "National Emission Standards for Hazardous Air Pollutants" (NESHAP) apply to this source? _____

H. Do "Reasonably Available Control Technology" (RACT) requirements apply to this source? NO

   a. If yes, for what pollutants? _____

   b. If yes, in addition to the information required in this form, any information requested in Rule 17-2.650 must be submitted.

Attach all supportive information related to any answer of "Yes". Attach any justification for any answer of "No" that might be considered questionable.

SECTION III: AIR POLLUTION SOURCES & CONTROL DEVICES (Other than Incinerators)

A. Raw Materials and Chemicals Used in your Process, if applicable: NOT APPLICABLE

Description	Contaminants		Utilization Rate - lbs/hr	Relate to Flow Diagram
	Type	% Wt		

B. Process Rate, if applicable: (See Section V, Item 1) NOT APPLICABLE

1. Total Process Input Rate (lbs/hr): _____

2. Product Weight (lbs/hr): _____

C. Airborne Contaminants Emitted: (Information in this table must be submitted for each emission point, use additional sheets as necessary)

Name of Contaminant	Emission[1]		Allowed[2] Emission Rate per Rule 17-2	Allowable[3] Emission lbs/hr	Potential[4] Emission		Relate to Flow Diagram
	Maximum lbs/hr	Actual T/yr			lbs/yr	T/yr	
V.O.C.	5.51	24.12			5.51	24.12	---
NOTE: These emissions are for tanks #9, 15, 17 & 18. Calculations are in							
accordance with AP-42.							

[1]See Section V, Item 2.

[2]Reference applicable emission standards and units (e.g. Rule 17-2.600(5)(b)2. Table II, E. (1) - 0.1 pounds per million BTU heat input)

[3]Calculated from operating rate and applicable standard.

[4]Emission, if source operated without control (See Section V, Item 3).

D. Control Devices: (See Section V, Item 4) NOT APPLICABLE

Name and Type (Model & Serial No.)	Contaminant	Efficiency	Range of Particles Size Collected (in microns) (If applicable)	Basis for Efficiency (Section V Item 5)

E. Fuels NOT APPLICABLE

Type (Be Specific)	Consumption*		Maximum Heat Input (MMBTU/hr)
	avg/hr	max./hr	

*Units: Natural Gas--MMCF/hr; Fuel Oils--gallons/hr; Coal, wood, refuse, other--lbs/hr.

Fuel Analysis:

Percent Sulfur: _____ Percent Ash: _____

Density: _____ lbs/gal Typical Percent Nitrogen: _____

Heat Capacity: _____ BTU/lb _____ BTU/gal

Other Fuel Contaminants (which may cause air pollution): _____

_____

F. If applicable, indicate the percent of fuel used for space heating.

Annual Average N/A Maximum N/A

G. Indicate liquid or solid waetes genersted and method of disposal. N/A

_____

_____

_____

_____

H. Emission Stack Geometry and Flow Characteristics (Provide data for each stack): --N/A--

Stack Height: _____ ft. Stack Diameter: _____ ft.

Gas Flow Rate: _____ ACFM _____ DSCFM Gas Exit Temperature: _____ °F.

Water Vapor Content: _____ % Velocity: _____ FPS

SECTION IV: INCINERATOR INFORMATION NOT APPLICABLE

Type of Waste	Type 0 (Plastics)	Type I (Rubbish)	Type II (Refuse)	Type III (Garbage)	Type IV (Pathological)	Type V (Liq.& Gas By-prod.)	Type VI (Solid By-prod.)
Actual lb/hr Incinerated							
Uncontrolled (lbs/hr)							

Description of Waste _____

Total Weight Incinerated (lbs/hr) _____ Design Capacity (lbs/hr) _____

Approximate Number of Hours of Operation per day _____ day/wk _____ wks/yr. _____

Manufacturer _____

Date Constructed _____ Model No. _____

	Volume $(ft)^3$	Heat Release (BTU/hr)	Fuel		Temperature (°F)
			Type	BTU/hr	
Primary Chamber					
Secondary Chamber					

Stack Height: _____ ft. Stack Diamter: _____ Stack Temp. _____

Gas Flow Rate: _____ ACFM _____ DSCFM* Velocity: _____ FPS

*If 50 or more tons per day design capacity, submit the emissions rate in grains per standard cubic foot dry gas corrected to 50% excess air.

Type of pollution control device: [ ] Cyclone [ ] Wet Scrubbar [ ] Afterburner

[ ] Other (specify) _____

Brief description of operating characteristics of control devices: _____

_____

_____

_____

_____

Ultimate disposal of any effluent other than that emitted from the stack (scrubber water, ash, etc.):

_____

_____

_____

_____

NOTE: Items 2, 3, 4, 6, 7, 8, and 10 in Section V must be included where applicable.

SECTION V: SUPPLEMENTAL REQUIREMENTS

Please provide the following supplements where required for this application.

1. Total process input rate and product weight -- show derivation [Rule 17-2.100(127)] --N/A--

2. To a construction application, attach basis of emission estimate (e.g., design calculations, design drawings, pertinent manufacturer's test data, etc.) and attach proposed methods (e.g., FR Part 60 Methods 1, 2, 3, 4, 5) to show proof of compliance with applicable standards. To an operation application, attach test results or methods used to show proof of compliance. Information provided when applying for an operation permit from a construction permit shall be indicative of the time at which the test was made.

3. Attach basis of potential discharge (e.g., emission factor, that is, AP42 test).

4. With construction permit application, include design details for all air pollution control systems (e.g., for baghouse include cloth to air ratio; for scrubber include cross-section sketch, design pressure drop, etc.)

5. With construction permit application, attach derivation of control device(s) efficiency. Include test or design data. Items 2, 3 and 5 should be consistent: actual emissions = potential (1-efficiency).

6. An 8 1/2" x 11" flow diagram which will, without revealing trade secrets, identify the individual operations and/or processes. Indicate where raw materials enter, where solid and liquid waste exit, where gaseous emissions and/or airborne particles are evolved and where finished products are obtained.

7. An 8 1/2" x 11" plot plan showing the location of the establishment, and points of airborne emissions, in relation to the surrounding area, residences and other permanent structures and roadways (Example: Copy of relevant portion of USGS topographic map).

8. An 8 1/2" x 11" plot plan of facility showing the location of manufacturing processes and outlets for airborne emissions. Relate all flows to the flow diagram.

9. The appropriate application fee in accordance with Rule 17-4.05. The check should be made payable to the Department of Environmental Regulation.

10. With an application for operation permit, attach a Certificate of Completion of Construction indicating that the source was constructed as shown in the construction permit.

SECTION VI: BEST AVAILABLE CONTROL TECHNOLOGY NOT APPLICABLE

A. Are standards of performance for new stationary sources pursuant to 40 C.F.R. Part 60 applicable to the source?

[ ] Yes [ ] No

Contaminant	Rate or Concentration

B. Has EPA declared the best available control technology for this class of sources (If yes, attach copy)

[ ] Yes [ ] No

Contaminant	Rate or Concentration

C. What emission levels do you propose as best available control technology?

Contaminant	Rate or Concentration

D. Describe the existing control and treatment technology (if any).

1. Control Device/System:
2. Operating Principles:
3. Efficiency:*
4. Capital Costs:

*Explain method of determining

5. Useful Life:

6. Operating Costs:

7. Energy:

8. Maintenance Cost:

9. Emissions:

Contaminant	Rate or Concentration

10. Stack Parameters

a. Height: ft.

b. Diameter: ft.

c. Flow Rate: ACFM

d. Temperature: °F.

e. Velocity: FPS

E. Describe the control and treatment technology available (As many types as applicable, use additional pages if necessary).

1.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

2.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availsbility of construction materials and process chemicals:

[1]Explain method of determining efficiency.
[2]Energy to be rsportsd in units of electrical power - KWH design rate.

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

3.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Cost:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

4.

a. Control Device:

b. Operating Principles:

c. Efficiency:[1]

d. Capital Costs:

e. Useful Life:

f. Operating Cost:

g. Energy:[2]

h. Maintenance Cost:

i. Availability of construction materials and process chemicals:

j. Applicability to manufacturing processes:

k. Ability to construct with control device, install in available space, and operate within proposed levels:

F. Describe the control technology selected:

1. Control Device:

2. Efficiency:[1]

3. Capital Cost:

4. Useful Life:

5. Operating Cost:

6. Energy:[2]

7. Maintenance Cost:

8. Manufacturer:

9. Other locations where employed on similar processes:

a. (1) Company:

(2) Mailing Address:

(3) City:

(4) State:

[1]Explain method of determining efficiency.
[2]Energy to be reported in units of electrical power - KWH design rate.

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

b. (1) Company:

(2) Mailing Address:

(3) City: (4) State:

(5) Environmental Manager:

(6) Telephone No.:

(7) Emissions:[1]

Contaminant	Rate or Concentration

(8) Process Rate:[1]

10. Reason for selection and description of systems:

[1]Applicant must provide this information when available. Should this information not be available, applicant must state the reason(s) why.

SECTION VII - PREVENTION OF SIGNIFICANT DETERIORATION

A. Company Monitored Data

1. _____ no. sites _____ TSP _____ ( ) SO^{2}* _____ Wind spd/dir

Period of Monitoring ___/___/___ to ___/___/___
month day year month day year

Other data recorded _____

Attach all data or statistical summaries to this application.

*Specify bubbler (B) or continuous (C).

2. Instrumentation, Field and Laboratory

a. Was instrumentation EPA referenced or its equivalent? [ ] Yes [ ] No

b. Was instrumentation calibrated in accordance with Department procedures?

[ ] Yes [ ] No [ ] Unknown

B. Meteorological Data Used for Air Quality Modeling --N/A--

1. _____ Year(s) of data from ____/____/____ to ____/____/____
month day year month day year

2. Surface data obtained from (location)_____

3. Upper air (mixing height) data obtained from (location)_____

4. Stability wind rose (STAR) data obtained from (location)_____

C. Computer Models Used --N/A--

1. _____ Modified? If yes, attach description.

2. _____ Modified? If yes, attach description.

3. _____ Modified? If yes, attach description.

4. _____ Modified? If yes, attach description.

Attach copies of all final model runs showing input data, receptor locations, and principle output tables.

D. Applicants Maximum Allowable Emission Data --N/A--

Pollutant	Emission Rate
TSP	_____ grams/sec
SO^2	_____ grams/sec

E. Emission Data Used in Modeling --N/A--

Attach list of emission sources. Emission data required is source name, description of point source (on NEDS point number), UTM coordinates, stack data, allowable emissions, and normal operating time.

F. Attach all other information supportive to the PSD review. --N/A--

G. Discuss the social and economic impact of the selected technology versus other applicable technologies (i.e., jobs, payroll, production, taxes, energy, etc.). Include assessment of the environmental impact of the sources. --N/A--

H. Attach scientific, engineering, and technical material, reports, publications, journals, and other compatent relevant information describing the theory and application of the requested best available control technology.

ATTACHMENT 6

GLEMAN ENGINEERING COMPANY
324 DATURA STREET
POST OFFICE BOX 3384
WEST PALM BEACH, FLORIDA 33402
TELEPHONE (305) 655-0506

September 21, 1984

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

Attention: Mr. Bruce Mitchell

Re: Belcher Oil Company
Port Canaveral Facility
Your: AC 05-090952
Our: 84-101-1

Gentlemen:

This letter confirms verbal information provided to your office during several telephone conversations on September 20, 1984 relating to ethanol throughput at the South Loading Rack for the referenced facility.

Maximum throughput is estimated to be 250,000 gallons per month average. This throughput equates to a total estimated throughput of 3,000,000 gallons (17,429 BBLS) per year maximum. Current throughputs are below this projected maximum and are averaging approximately 175,000 gallons per month. Based upon this 250,000 gallon per month figure, we estimate emissions from the VRU controlling this alcohol dispenser to be 42.58 lbs/YR (.019 lb/HR = .021 T/YR) maximum. Calculations per AP-42 are attached.

Additionally, please consider this alcohol throughput in addition to the currently permitted 3.6 million barrels per year throughput for gasoline.

Your assistance during this permitting process has been appreciated. Please feel free to call regarding any question or need for additional information.

Very truly yours,

Michael K. Gleman, P.E.
President

Enc.
cc: Mr. Dan E. Dudley - Belcher Oil
Mr. Bruce Smith, Jr. - Ethanol Corp.

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB DER PERMITS
SHEET NO. 1 OF 1
CALCULATED BY MKG DATE SEPT '84
CHECKED BY DATE
SCALE 84-101-1 BELCHER OIL - CANAVERAL

EMISSION CALCS PER AP-42

FOR ALCOHOL DISPENSER @ SOUTH LOADING RACK

$$L_L = 12.46 \left[\frac{SPM}{T}\right]\left[1 - \frac{eff.}{100}\right]$$

WHERE L_L = LOADING LOSS / 10^3 GAL.

S = SATURATION FACTOR
= 0.6 SUBMERGED LOADING, DEDICATED

P = TRUE VAPOR PRESS
= 1.1 PSIA @ 75°F

M = MOLECULAR WEIGHT
= 46

T = TEMP. °R

$$\therefore L_L = 12.46 \left[\frac{0.6\,(1.1)(46)}{533}\right]\left[1 - \frac{98}{100}\right] = .014194$$

= 0.014194 lbs / 1000 GAL.

FOR 3,000,000 GAL/YR (250,000 GAL/MONTH MAX):

$L_L = 0.014194\,(3{,}000{,}000) \div 1{,}000 = 42.58$ lbs/YR

$L_L = 42.58$ lbs/YR = .021 T/YR = .019 lbs/HR MAX.

ATTACHMENT 7

6

DER
OCT 8 1984
BAQM

WAIVER OF 90 DAY TIME LIMIT
UNDER SECTION 120.60(2), FLORIDA STATUTES

License (Permit, Certification) Application No. AC 05-090952 AC 05-092822
Applicant's Name: Belcher Oil Company

The undersigned has read Section 120.60(2), Florida Statutes, and fully understands the Applicant's rights under that section.

With regard to the above referenced license (permit, certification) application, the Applicant hereby with full knowledge and understanding of (his) (her) (its) rights under Section 120.60(2), Florida Statutes, waives the right under Section 120.60(2), Florida Statutes, to have the application approved or denied by the State of Florida Department of Environmental Regulation within the 90 day time period prescribed in Section 120.60(2), Florida Statutes. Said waiver is made freely and voluntarily by the Applicant, is in (his) (her) (its) self-interest, and without any pressure or coercion by anyone employed by the State of Florida Department of Environmental Regulation.

This waiver shall expire on the 9th day of December 1984.

The undersigned is authorized to make this waiver on behalf of the applicant.

Albin W. Smith
Signature

Albin W. Smith, President
Name of Signee

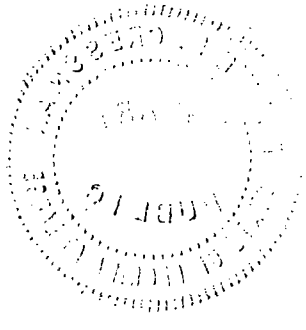
October 2, 1984
Date

Sworn to and subscribed
before me this 02 day
of October 1984.

Bonnie L Grossman
NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES OCT. 26 1984
BONDED THRU GENERAL INS. UNDERWRITERS

Section 120.60, Florida Statutes

(2) When an application for a license is made as required by law, the agency shall conduct the proceedings required with reasonable dispatch and with due regard to the rights and privileges of all affected parties or aggrieved persons. Within 30 days after receipt of an application for a license, the agency shall examine the application, notify the applicant of any apparent errors or omissions, and request any additional information the agency is permitted by law to require. Failure to correct an error or omission or to supply additional information shall not be grounds for denial of the license unless the agency timely notified the applicant within this 30 day period. The agency shall notify the applicant if the activity for which he seeks a license is exempt from the licensing requirement and return any tendered application fee within 30 days after receipt of the original application or within 10 days after receipt of the timely requested additional information or correction of errors or omissions. Every application for license shall be approved or denied within 90 days after receipt of the original application or receipt of the timely requested additional information or correction of errors or omissions. Any application for a license not approved or denied within the 90-day period or within 15 days after conclusion of a public hearing held on the application, whichever is latest, shall be deemed approved and, subject to the satisfactory completion of an examination, if required as a prerequisite to licensure, [2](the license) shall be issued. The Public Service Commission, when issuing a license, and any other agency, if specifically exempted by law, shall be exempt from the time limitations within this subsection. Each agency, upon issuing or denying a license, shall state with particularity the grounds or basis for the issuance or denial of same, except where issuance is a ministerial act. On denial of a license application on which there has been no hearing, the denying agency shall inform the applicant of any right to a hearing pursuant to s. 120.57.



ATTACHMENT 8

GLEMAN ENGINEERING COMPANY

324 DATURA STREET

POST OFFICE BOX 3384

WEST PALM BEACH, FLORIDA 33402

TELEPHONE (305) 655-0506

October 18, 1984

State of Florida
Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, FL 32301-8241

DER

OCT 22 1984

BAQM

Attention: Mr. Bruce Mitchell

Re: Belcher Oil Company
Port Canaveral Facility
Your: AC 05-~~090952~~ 094507
Our: 84-101-1

Gentlemen:

As discussed by phone, this letter confirms that Belcher Oil Company is planning to renovate Storage Tank #7 (nominal 55,000 BBLS capacity) in the near future. It is anticipated that work on this tank will begin as soon as a permit can be secured and completed within several months thereafter. Upon completion of this work, the tank will be used as a fixed roof tank.

Annual throughput is estimated to be 811,000 BBLS. This throughput will be in addition to the currently permitted diesel throughput for Tanks #1, 12 and 13. Total estimated emissions from Tank #7 is 2,179.98 lbs/Yr (1.09 T/Yr) of which 1,226.24 lbs/Yr (.61 T/Yr) is breathing loss and 953.74 lbs/Yr (.48 T/Yr) is working loss. Calculations per AP-42 are enclosed.

We understand that this renovation of Tank #7 can be included in the current construction permitting review being conducted by your office. Please feel free to call regarding any question or need for additional information.

Very truly yours,

Michael K. Gleman, P.E.
President

MKG/lm
Enc.

cc: Mr. Dan E. Dudley - Belcher Oil Company
Roger Caldwell - 10/23/84

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB 84-101-1
SHEET NO. 1 OF 2
CALCULATED BY MLG DATE Oct '84
CHECKED BY DATE
SCALE BELCHER OIL - PORT CANAVERAL

EMISSION CALCULATIONS
STORAGE TANK #7 - FIXED ROOF
100' ϕ x 40' HEIGHT

II] BREATHING LOSSES:

$$L_B = 2.26 \times 10^{-2} M \left[\frac{P}{14.7 - P}\right]^{.68} D^{1.73} H^{.51} \Delta T^{.50} F_P C K_C = \text{lbs/Yr}$$

WHERE M = MOLECULAR WEIGHT = 130

P = TRUE VAPOR PRESS. = .0090

D = TANK DIAMETER = 100

H = AVG. VAPOR SPACE HEIGHT WITH ROOF CORRECTION = 21.39

ΔT = AVG. DIURNAL TEMP. CHANGE = 11.0 (79° - 68° PER NOAA CLIMATOLOGICAL DATA)

F_P = PAINT FACTOR = 1.40 (medium grey)

C = SMALL TANK ADJUSTMENT FACTOR = 1.0

K_C = PRODUCT FACTOR = 1.0

$$L_B = 2.26 \times 10^{-2} [130] \left[\frac{.0090}{14.7 - .009}\right]^{.68} [100]^{1.73} [21.39]^{.51} [11]^{.50} [1.4][1.0][1.0]$$

$$L_B = \underline{1,226.24 \text{ lbs/Yr} = .61 \text{ T/Yr.}}$$

GLEMAN ENGINEERING COMPANY
Post Office Box 3384
WEST PALM BEACH, FLORIDA 33402
(305) 655-0506

JOB 84-101-1
SHEET NO. 2 OF 2
CALCULATED BY MKG DATE
CHECKED BY DATE
SCALE BELCHER OIL - PORT CANAVERAL

[2] WORKING LOSSES:

$$L_W = 2.40 \times 10^{-2} M P K_N K_C$$

WHERE M = MOLECULAR WEIGHT = 130

P = TRUE VAPOR PRESS. = .0090

K_N = TURNOVER FACTOR = 1.0 FOR 15 TURNOVERS ±

K_C = PRODUCT FACTOR = 1.0

$$L_W = 2.40 \times 10^{-2} (130)(.0090)(1.0)(1.0) \text{ lbs}/1000 \text{ GAL}$$

$$= .028 \text{ lbs}/1000 \text{ GAL.}$$

FOR 811,000 BBLS = 34,062,000 GAL.

$$\therefore L_W = .028/1000 \text{ GAL} \times 34,062,000$$

$$= \underline{953.74 \text{ lbs}/\text{YR}}$$

TOTAL LOSSES = $L_B + L_W$

$$= 1,226.24 + 953.74$$

$$= \underline{2,179.98 \text{ lbs}/\text{YR} = 1.09 \text{ T}/\text{YR}}$$