STATEMENT OF BASIS

TransMontaigne Operating Company, L.P.
Cape Canaveral Terminal
Facility ID No.: 0090029
Brevard County

Title V Air Operation Permit Renewal
FINAL Permit No.: 0090029-010-AV

This Title V air operation permit renewal is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. 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 permitting authority, in accordance with the terms and conditions of this permit.

This facility is a bulk gasoline terminal which contains the following emission units:

a) Steam Boiler No. 2 - Cleaver Brooks, Model CB655-150 (5.0 MMBTU/hr)
b) Asphalt Heaters No. 5 and 6 - First Thermal Systems (10.2 MMBTU/hr each)
c) Sixteen Petroleum Storage Tanks {subject to Rule 62-296.320(1), F.A.C.} as follows:

Tank #	Worse-Case Product	Shell Capacity (bbl)	Roof Type
1	#6/Asphalt	80,265	FR
2	#2/Asphalt	55,778	FR
3	Asphalt	33,607	FR
4	Asphalt	20,109	FR
5	Asphalt	1,214	FR
6	Asphalt	20,097	FR
7	#6 Fuel Oil	65,270	FR
9	Gasoline	33,741	IFR
10	Asphalt	3,010	FR
11	Asphalt	3,009	FR
12	Gasoline	8,955	IFR
13	Gasoline	8,048	IFR
14	Asphalt	1,497	FR
15	Gasoline	54,919	EFR w/dome
19	Additive	247	FR
23	Additive	242	FR

d) Three Petroleum Storage Tanks {subject to NSPS Subpart Kb or K} as follows:

Tank #	Worse-Case Product	Shell Capacity (bbl)	Roof Type	NSPS
8	Gasoline	121,838	IFR	Kb
17	Gasoline	99,388	IFR	K
18	Gasoline	98,317	IFR	K

e) South Gasoline Loading Rack (SLR) {subject to NSPS Subpart XX} with nine gasoline loading arms and three diesel loading arms and equipped with a John Zink Vapor Combustion Unit which provides a VOC reduction efficiency of approximately 98%. Per the permit renewal received November 26, 2008, an ethanol loading riser was added.

f) North Loading Rack (NLR) with one #2 fuel oil loading position and one #6 fuel oil loading position. / Asphalt Loading Rack (ALR) with one asphalt loading position and one anti-strip loading position. / Marine Loading/Unloading and Vessel Bunkering. / Ethanol Loading / Fugitive Emissions from valves, flanges, fittings, pumps, etc.

Also included in this permit are miscellaneous insignificant emission units and/or activities

Based on the initial Title V permit application received June 14, 1996 and the renewal applications received October 8, 2003 and November 26, 2008, this facility is not a major source of hazardous air pollutants (HAPs).

The applicable emission limitations are as follows:

a) One Steam Boiler and Two Asphalt Heaters - VE limit per Rule 62-296.406(1), F.A.C.; BACT per Rule 62-296.406(2)&(3), F.A.C.; excess emissions per Rule 62-210.700(1), (2), (3)&(4), F.A.C.; annual PM, NOX, & SO2 limits per construction permit; (heaters only) 40 CFR Part 60, NSPS Subpart Dc

b) Sixteen Petroleum Storage Tanks - general VOC standard per Rule 62-296.320(1)(a), F.A.C.

c) Three Petroleum Storage Tanks - 40 CFR Part 60, NSPS Subpart Kb or K

d) South Gasoline Loading Rack (SLR) - 40 CFR Part 60, NSPS Subpart XX (35 mg/liter)

e) North Loading Rack (NLR) with one #2 fuel oil loading position and one #6 fuel oil loading position. / Asphalt Loading Rack (ALR) with one asphalt loading position and one anti-strip loading position. / Marine Loading/Unloading and Vessel Bunkering. / Ethanol Loading. / Fugitive Emissions from valves, flanges, fittings, pumps, etc. - general VOC standard per Rule 62-296.320(1)(a), F.A.C.

Steam Boiler No. 1 was removed from the facility and permit pursuant to electronic mail from the applicant dated July 13, 2009.

The contents of Tank #12 and #13 was changed from no. 2 fuel oil to gasoline pursuant to requests from the applicant dated June 27, 2003 and July 2, 2009. This change was authorized in the renewed Title V permit 0090029-006-AV issued October 5, 2004.

The renewal application states the facility is subject to NESHAP, 40CFR63, Subpart BBBBBB with a compliance date of January 10, 2011. Therefore, Subpart BBBBBB is included in the permit.