



ENVIRONMENTAL PROTECTION DIVISION
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NOTICE OF ADMINISTRATIVELY CORRECTED TITLE V AIR OPERATION PERMIT

In the Matter of a Request for Administrative Correction:

John McFadden, Operations Manager
Central Florida Pipeline LLC
2101 GATX Drive
Tampa, FL 33605

Project No. 0950069-020-AV
Administrative Correction to:
Permit No. 0950069-019-AV
Orange County

Enclosed are the administratively corrected pages to Title V Air Operation Permit No. 0950069-019-AV for the operation of the Orlando Terminal located in Orange County at 9919 South Orange Avenue, Orlando, Florida. This correction is issued pursuant to Rule 62-210.360, Florida Administrative Code (F.A.C.), and Chapter 403, Florida Statutes (F.S.). This change is made at the applicant's request dated February 18, 2016, to replace the Vapor Recovery Unit's (VRU's) total hydrocarbon VOC analyzer with a methane excluding or methane compensating VOC analyzer. This change was allowed by USEPA in a letter to Kinder Morgan dated January 5, 2016. This corrective action does not alter the effective dates of the existing permit.

The Orange County Environmental Protection Division (EPD) will consider the above-noted action final unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S. Mediation under Section 120.573, F.S., will not be available for this proposed action.

Petitions: A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative hearing in accordance with Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed with (received by) the Office of the Orange County Attorney, 201 South Rosalind Avenue, Third Floor, Orlando, Florida 32801 (Telephone 407-836-7320). Petitions must be filed within 14 days of receipt of this administratively corrected permit. A petitioner shall mail a copy of the petition to the applicant at the address indicated above, at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention (in a proceeding initiated by another party) will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Permitting Authority's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner; the name, address and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of when and how each petitioner received notice of the agency action or proposed decision; (d) A statement of all disputed issues of material fact.

Orlando Terminal
Administrative Correction

Project No. 0950069-020-AV
Administrative Correction to Title V Air Operation Permit

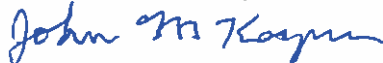
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If there are none, the petition must so state; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action including an explanation of how the alleged facts relate to the specific rules or statutes; and, (g) A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the agency to take with respect to the agency's proposed action. A petition that does not dispute the material facts upon which the Permitting Authority's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Permitting Authority's final action may be different from the position taken by it in this written notice. Persons whose substantial interests will be affected by any such final decision of the Permitting Authority on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Judicial Review: Any party to this permitting decision (order) has the right to seek judicial review of it under Section 120.68, F.S., by filing a notice of appeal under Rule 9.110 of the Florida Rules of Appellate Procedure with the clerk of the Office of the Orange County Attorney, 201 South Rosalind Avenue, Third Floor, Orlando, Florida 32801 (Telephone 407-836-7320), and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate District Court of Appeal. The notice must be filed within 30 days after this order is filed with the clerk of the Department.

Executed in Orlando, Florida.



for Reneé H. Parker
Environmental Program Supervisor

(4) JMK/RHP:bh

CERTIFICATE OF SERVICE

The undersigned duly designated deputy agency clerk hereby certifies that this Notice of Administratively Corrected Permit (including the corrected pages) was sent by certified and electronic mail with received receipt requested to the persons listed below:

John McFadden, Central Florida Pipeline LLC: JohnJ.McFadden@kindermorgan.com

Christopher Fleck, P.E., Central Florida Pipeline LLC: Christopher.Fleck@kindermorgan.com

Richard Semcheski, Central Florida Pipeline LLC: Richard.Semcheski@kindermorgan.com

Ken Brinegar, Central Florida Pipeline LLC: Ken.Brinegar@kindermorgan.com

Kevin Golden, P.E., Universal Solutions, Inc.: kgolden@usienviromental.com

Tom Lubozynski, P.E., Florida DEP: tom.lubozynski@dep.state.fl.us

Barbara Friday, Florida DEP: barbara.friday@dep.state.fl.us (for posting with U.S. EPA Region 4, Natasha Hazziez, Ana Oquendo)

Clerk Stamp

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


Clerk Stamp


(Date)

NOTICE OF ADMINISTRATIVELY CORRECTED TITLE V AIR OPERATION PERMIT

The following permit conditions are revised as indicated. **Strikethrough** is used to denote the deletion of text. **Double-underlines** are used to denote the addition of text. All changes are emphasized with shading.

The Kinder Morgan/CFPL Orlando facility proposes to replace the VRU's VOC analyzer that measures total hydrocarbons. The proposed replacement is the Infrared Industries Model IR8400D, a VOC analyzer that measures both total hydrocarbon and methane, and can determine non-methane VOC. This permit project is an administrative correction to permit 0950069-019-AV to allow the following changes.

1. The CAM Plan of permit 0950069-019-AV is changed to add a permitting note allowing use of a methane compensating VOC analyzer for the VRU exhaust. The methane compensating VOC analyzer, Infrared Industries Model IR 8400D, was allowed by USEPA in a letter to Kinder Morgan dated January 5, 2016.

Vapor Recovery Unit (VRU) CAM Plan

	Indicator No. 1
Indicator	Continuously monitor VRU outlet VOC concentration as percent propane
Monitoring Approach	Use the VRU's VOC analyzer that monitors VOC concentration continuously. <i>{Permitting Note: The facility may use an Infrared Industries methane compensating VOC analyzer (e.g., Infrared Industries Model IR 8400D).}</i>

2. The USEPA letter to Kinder Morgan dated January 5, 2016 also authorized use of the Infrared Industries Model IR 208DC methane compensating VOC analyzer as an alternative to using EPA Method 25A and Method 18 in performance and RATA testing. This was noted in condition B.6. of permit 0950069-019-AV.

Test Methods and Procedures

- B.6. Test Methods.** Required tests shall be performed in accordance with the following reference methods:

EPA Method	Description of Method and Comments
2A	Direct Measurement of Gas Volume Through Pipes and Small Ducts
2B	Determination of Exhaust Gas Volume Flow Rate From Gasoline Vapor Incinerators
21	Determination of Volatile Organic Compound Leaks
22	Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions From Flares
25A	Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer
25B	Determination of Total Gaseous Organic Concentration Using a Non-dispersive Infrared Analyzer
27	Determination of Vapor Tightness of Gasoline Delivery Tank
40 CFR 60 Appendix B, Performance Specification 8	Performance Specifications For Volatile Organic Compound Continuous Emission Monitoring Systems in Stationary Sources

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The above methods are described in 40 CFR 60, Appendix A and B, and adopted by reference in Rule 62-204.800, F.A.C. USEPA's letter to Kinder Morgan dated January 5, 2016 authorized use of the Infrared Industries Model IR 208DC methane compensating VOC analyzer as an alternative to using EPA Method 25A and Method 18 in VRU performance and RATA testing with methane compensating VOC analyzers. No other methods may be used unless prior written approval is received from EPD. [40 CFR 60, Appendix A and B; Rules 62-204.800 and 62-297.401, F.A.C.]



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CORRECTED PAGES FOR PERMIT 0950069-019-AV

SECTION III. EMISSION UNITS AND SPECIFIC CONDITIONS.

Subsection B. Loading Racks

[Rule 62-210.200, (PTE), F.A.C., Construction Permit 0950069-016-AC]

Monitoring of Operations

B.5. CAM Plan. The VRU and VCU are subject to the Compliance Assurance Monitoring (CAM) requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), F.A.C. [40 CFR 64; Rules 62-204.800 and 62-213.440(1)(b)1.a., F.A.C.]

Test Methods and Procedures

B.6. Test Methods. Required tests shall be performed in accordance with the following reference methods:

EPA Method	Description of Method and Comments
2A	Direct Measurement of Gas Volume Through Pipes and Small Ducts
2B	Determination of Exhaust Gas Volume Flow Rate From Gasoline Vapor Incinerators
21	Determination of Volatile Organic Compound Leaks
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25A	Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer
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40 CFR 60 Appendix B, Performance Specification 8	Performance Specifications For Volatile Organic Compound Continuous Emission Monitoring Systems in Stationary Sources

The above methods are described in 40 CFR 60, Appendix A and B, and adopted by reference in Rule 62-204.800, F.A.C. USEPA's letter to Kinder Morgan dated January 5, 2016 authorized use of the Infrared Industries Model IR 208DC methane compensating VOC analyzer as an alternative to using EPA Method 25A and Method 18 in VRU performance and RATA testing with methane compensating VOC analyzers. No other methods may be used unless prior written approval is received from EPD. [40 CFR 60, Appendix A and B; Rules 62-204.800 and 62-297.401, F.A.C.]

B.7. Common Testing Requirements. Unless otherwise specified, tests shall be conducted in accordance with the requirements and procedures specified in Appendix TR, Facility-Wide Testing Requirements, of this permit. [Rule 62-297.310, F.A.C.]

B.8. Stack Sampling. The permittee shall comply with the requirements contained in Rule 62-297.310(6), F.A.C., Stack Sampling Facilities. [Rule 62-297.310(7), F.A.C.]

B.9. VRU Compliance Tests: Beginning July 1, 2013, the VRU shall be tested for compliance within 365 days of the expiration date of the operation permit. The VRU shall be tested for compliance as specified in 40 CFR Part 60 Subpart XX and 40 CFR Part 63 Subpart BBBBBB. The VRU compliance test report shall be submitted with the operation permit renewal application. [Rules 62-4.070(3) and 62-297.310(8), F.A.C., Construction Permit 0950069-016-AC]

B.10. Annual VRU RATA Testing: The VRU's VOC analyzer shall be tested annually for relative accuracy in compliance with the Relative Accuracy Test Audit (RATA) requirements of 40 CFR Part 60 Appendix B, Performance Specification 8. The RATA test report shall be submitted to EPD but need not be submitted to US EPA. [Rule 62-4.070(3), F.A.C., Construction Permit 0950069-016-AC]

APPENDIX CAM

COMPLIANCE ASSURANCE MONITORING REQUIREMENTS

Vapor Recovery Unit (VRU) CAM Plan

	Indicator No. 1	Indicator No. 2
Indicator	Continuously monitor VRU outlet VOC concentration as percent propane	Monitor system performance through weekly inspections.
Monitoring Approach	Use the VRU's VOC analyzer that monitors VOC concentration continuously. <i>{Permitting Note: The facility may use an Infrared Industries methane compensating VOC analyzer (e.g., Infrared Industries Model IR 8400D).}</i>	Visual determination
Indicator Range Action Level Range	The VRU is programmed to trigger a loading rack shutdown alarm (which ceases product loading at the racks) when VOC emissions from the VRU exceed 9.0 mg/L (90% of the permitted emission limit of 10.0 mg/L). The VRU is also programmed to trigger a warning alarm when VOC emissions from the VRU exceed 6.8 mg/L (75% of the shutdown alarm value of 9.0 mg/L. These alarm values are based on 6-hour rolling average values.	The VRU will be inspected to ensure that the various operating parameters are within the specified ranges as recommended by the manufacturer. Inspection includes completing a checklist once per week and recording instantaneous readings of various operating parameters such as operating pressures, temperatures, and flow rates of specific pieces of VRU equipment.
Excursion Level / Reportable Incident Range	Loading rack shutdown alarms will be recorded by the PLC. Product loading at the EU 012 Loading Racks will cease if the VOC emissions from the VRU exceed 9.0 mg/L on a six hour rolling average basis. An exceedance will occur when the VOC emissions exceed 10.0 mg/L on a 6-hour rolling average basis while active loading is occurring, which corresponds to a VRU stack outlet concentration of 0.86% VOC (as C ₃) by volume.*	A reportable incident (although not necessarily indicative of an emission of VOC above permitted levels) would occur if the weekly inspections are not performed and documented. Operational fail safes, such as warning and shutdown alarms, are present for key operational parameters. Shutdown alarms must be resolved before normal VRU operations can be resumed.
Response to Indicators Action Level Range	Breach of the action level range will trigger an investigation, corrective action and an internal reporting requirement. Upon an action level alarm being acknowledged by the facility, a corrective action will be initiated within 24 hours. If onsite personnel cannot conduct the required corrective action, a contractor will be contacted and brought onsite as soon as possible. If the VRU is not operational, the VCUs shall be used as the control device for loading operations associated with EU 012.	Shutdown alarms must be resolved before normal VRU operations can be resumed.

APPENDIX CAM

COMPLIANCE ASSURANCE MONITORING REQUIREMENTS

Performance Criteria Data Representativeness	The correlation between the stack outlet VOC concentration (percent by volume) and the continuous emissions monitoring system alarm set points are based on the most recent successful compliance stack test. The stack test was conducted in accordance with accepted EPA methods.	Facility personnel will utilize a checklist during the weekly VRU inspection to verify key operational parameters are within acceptable operating ranges.
Verification of Operational Status	The VRU's VOC analyzer is fully operational.	Weekly inspections are being performed and operational data are being documented.
QA/QC Operational Practices Criteria	The VRU's VOC analyzer is calibrated in accordance with the manufacturer's specifications.	Use standardized inspection forms provided by the VRU manufacturer.
Monitoring Frequency	The outlet VOC concentration from the VRU is monitored continuously and visual alarms are triggered when the action level is breached. The outlet VOC concentration is recorded by a data acquisition system on 1-minute intervals. The concentration shall be averaged, as applicable, over the applicable averaging period.	Inspections will be conducted on a weekly basis.
Data Collection Procedures	The outlet VOC concentration readings are recorded by a data acquisition system. Reports of the recorded VOC concentration data are generated daily. The history of alarm occurrences is also recorded.	Weekly inspections will be performed and data will be recorded on standardized inspection forms provided by the manufacturer.
Averaging Period	The VRU outlet VOC concentration is averaged over a six (6) hour continuous period.	N/A
APCD Bypass Monitoring	The VRU will serve as the primary control device for this PSEU. The VCUs will serve as the backup control device. Under normal conditions, the bypass of the VRU or VCUs cannot occur based on the design of this PSEU. Specifically, all the vapors collected at the loading racks flow through a single header to the VRU or through individual headers to the VCUs. Direction of the vapors to the VRU or VCUs will be controlled by a manual, two-way valve (i.e., if the valve is open to one control device it is closed to the other control device). There are no other lines coming from the loading racks, thus there are no alternative pathways for the vapors to bypass the VRU or the VCUs during normal operation.	

*This value may change based on the latest successful compliance demonstration and confirmation of proposed changes from EPD. A Title V permit modification is not required to approve the changes to the correlations between outlet VOC concentration (in percent VOC by volume) and VOC emissions (in mg/L)