



Jeb Bush
Governor

Department of Environmental Protection

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Northwest District
160 Governmental Center
Pensacola, Florida 32501-5794

David B. Struhs
Secretary

February 8, 2000

William W. Grygar II
Manager, Air Compliance
TransMontaigne Inc.
P O Box 1503
Fayetteville AR 72702

Dear Mr. Grygar:

This is in response to your December 20, 1999 letter enclosing a permit application to include Tank 11, a recently constructed and placed in service 60,000-barrel gasoline IFR storage tank, as part of Emission Unit 011 in your Pensacola Terminal facility permit (0330139-006-AF). This letter approves your request, and modifies the facility permit accordingly. This letter makes the following changes to the permit:

The permit ID number is changed to 0330139-008-AF

1. Page 2, Subsection A, paragraph 3 includes the following additional language:
Tank 11 is a 60,000-barrel gasoline storage tank with an internal floating roof and mechanical shoe seal with a secondary wiper seal constructed and placed in operation in 1999 and subject to the requirements of 40 CFR 60 Subpart Kb.
2. Page 2, Subsection B, EU 011. Includes the following additional language:
Tank 11, gasoline, internal floating roof
3. Page 3, Subsection C. Relevant Documents. Includes the following additional language:
Construction Permit 0330139-005-AC
5. Page 6, Section III, Subsection A, EU 011. Includes the following additional language:
Tank 11, gasoline, internal floating roof
6. Page 8. Subsection B, EU 011. Includes the following additional language:
Tank 11, gasoline, internal floating roof
7. Page 8, Permitting note, includes the following additional language:
Tank 11 is a 60,000-barrel gasoline storage tank with an internal floating roof and mechanical shoe seal with a secondary wiper seal constructed and placed in operation in 1999 and subject to the requirements of 40 CFR 60 Subpart Kb.

Revised pages of the permit are enclosed for your files. If you have any questions, please contact Bob Kriegel at (850) 595-8364, extension 1231.

Sincerely,

Ed K. Middleswart, P.E.
Air Program Administrator

EKM:bkc
Enclosure

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Section I. Facility Information.

Subsection A. Facility Description.

Petroleum products terminal consisting of barge offloading, petroleum products and additives storage tanks, truck loading rack, hydrocarbon vapor combustion unit and administrative offices. Gasoline and diesel fuel are received by barge and stored in tanks. Gasoline, blended with additives, and diesel are loaded by a bottom-loading multi-bay loading rack into tanker trucks for distribution.

Tanks 1, 2, 5, 7 and 9 have internal floating roofs. Tanks 1, 2, 5 and 7 are used for gasoline storage. Tank 5 is out of service and tank 9 is used for Diesel storage. Tanks 3, 4, 6, 8 and 10 are used for Diesel storage and are cone roof tanks. Tank 6 is out of service. Four smaller tanks used for storage of private label gasoline proprietary additives emit less than .04 T/yr of VOC combined. The facility also contains a 550 gallon dye injection tank and 8,000 gallon tank bottom water tank.. The loading rack is capable of operating at a maximum loading rate of four trucks per hour. VOC emissions from the loading rack are controlled by a Vapor Combustion Unit (VCU).

The original riveted-construction tank 2 was replaced by a welded-construction internal floating roof tank under AC17-268873, amended August 16, 1996. It was constructed per the requirements of 40 CFR 60 Subpart Kb, utilizing a galvanized primary mechanical shoe seal and a secondary wiper. Tank 11 is a 60,000-barrel gasoline storage tank with an internal floating roof and mechanical shoe seal with a secondary wiper seal constructed and placed in operation in 1999 and subject to the requirements of 40 CFR 60 Subpart Kb.

Based on the permit application received, this facility is not a major source of hazardous air pollutants (HAPs). Facility-total VOC emissions are estimated to be less than 44 T/yr. Due to the nature of the process, the materials handled and the emissions controls, we have reasonable assurance that HAP emissions are below major source thresholds.

Subsection B. Summary of Emissions Unit ID No(s). and Brief Description(s).

<u>EU ID No.</u>	<u>Brief Description</u>
	<u>Identifier, Service, Control Equipment</u>
001	Tank 1, gasoline, internal floating roof Tank 5, gasoline, internal floating roof (out of service) Tank 7, gasoline, internal floating roof Tank 11, gasoline, internal floating roof
002	Tank 3, diesel, none (cone roof) Tank 4, diesel, none (cone roof) Tank 6, diesel, none (cone roof) (out of service) Tank 8, diesel, none (cone roof) Tank 9, diesel, internal floating roof Tank 3, diesel, none (cone roof) Miscellaneous Small Tanks, additives, dyes, tank bottom water, none (cone roof)
003	Loading Rack / VCU, gasoline/diesel, Vapor Combustion Unit (VCU, flare)
011	Tank 2, gasoline, internal floating roof Tank 11, gasoline, internal floating roof
012	Plant-Wide VOC Fugitives

Please reference the Permit No., Facility ID No., and appropriate Emissions Unit(s) ID No(s). on all correspondence, test report submittals, applications, etc.

Subsection C. Relevant Documents.

The documents listed below are not a part of this permit; however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Table 1-1, Summary of Air Pollutant Standards and Terms

Table 2-1, Summary of Compliance Requirements

Appendix H-1, Permit History / ID Number Changes

These documents are on file with permitting authority:

Construction Permit AC17-240654 Application received November 8, 1993

Construction Permit AC17-240654 Issued February 10, 1994

Construction Permit AC17-240654 Amended August 16, 1994

Operating Permit Application AO17-251343 Received May 26, 1994

Operating Permit AO17-251343 Issued July 20, 1994

Operating Permit AO17-251343 Amended September 1, 1994

Construction Permit AC17-268873 Application Received April 10, 1995

Construction Permit AC17-268873 Issued August 21, 1995

Operating Permit AO17-251343 Amendment Application Received January 19, 1996

(became 0330139-001-AO, then AF)

Operating Permit 0330139-001-AF Issued August 13, 1996

Construction Permit AC17-268873 Amended August 16, 1996

Operating Permit 0330139-001-AF Amended February 7, 1997

Operating Permit 0330139-001-AF Amended April 9, 1997

Operating Permit 0330139-001-AF Amended October 9, 1997

Operating Permit 0330139-001-AF Amended March 27, 1998

Operating Permit 0330139-001-AF Amendment Letter Received April 10, 1998

Construction Permit 0330139-005-AC

Section III. Emissions Unit(s) and Conditions.

Subsection A. This section addresses the following emissions unit(s).

E.U.

<u>ID No.</u>	<u>Brief Description</u>
	<u>Identifier, Service, Control Equipment</u>
001	Tank 1, gasoline, internal floating roof Tank 5, gasoline, internal floating roof (out of service) Tank 7, gasoline, internal floating roof
002	Tank 3, diesel, none (cone roof) Tank 4, diesel, none (cone roof) Tank 6, diesel, none (cone roof) (out of service) Tank 8, diesel, none (cone roof) Tank 9, diesel, internal floating roof Tank 3, diesel, none (cone roof) Miscellaneous Small Tanks, additives, dyes, tank bottom water, none (cone roof)
003	Loading Rack / VCU, gasoline/diesel, Vapor Combustion Unit (VCU, flare)
011	Tank 2, gasoline, internal floating roof Tank 11, gasoline, internal floating roof
012	Plant-Wide VOC Fugitives

Permitting Notes: IMPORTANT REGULATORY CLASSIFICATIONS - the facility is regulated under NSPS - 40 CFR 60, Subpart Kb, Subpart XX. adopted and incorporated by reference in Rule 62-204.800(7), F.A.C.; Facility is not subject to 40 CFR Subpart R, NESHAP for gasoline distribution facilities because it is not a major source, per 40 CFR 63.420(a)(2).

The following specific conditions apply to the emissions unit(s) listed above:

A.1. The permittee shall maintain records for all petroleum products received and loaded which show the annual throughput and emissions for the facility, individual tanks, and the loading rack. These records and the annual operating report shall be used to demonstrate compliance with Specific Conditions #A.2., #A.3., and #B.4.

[Rules 62-4.070, and 62-296.320(1)(a), F.A.C., AC17-268873]

A.2. Capacity. VOC and HAP emissions shall be controlled by proper operation and maintenance of the tank floating roofs, vapor collection system and vapor combustion unit (flare), and by limiting the maximum throughput of petroleum fluids through the facility. The maximum allowable annual throughputs for the facility are 270 MM gallons of gasoline and 100 MM gallons of diesel.

[Rules 62-4.070, 62-4.160(2), 62-210.200(PTE), 62-296.320(1)(a), F.A.C., and AC17-268873]

A.3. The maximum allowable combined VOC emissions for the facility are 43.42 T VOC/yr, based on annual throughputs of 270 MM gallons gasoline and 100 MM gallons of diesel.

[Rules 62-4.070 and 62-296.320(1)(a), F.A.C., and AC17-268873]

Subsection B. This section addresses the following emissions unit(s).

<u>E.U. ID No.</u>	<u>Brief Description</u>
011	<u>Identifier, Service, Control Equipment</u> Tank 2, gasoline, internal floating roof Tank 11, gasoline, internal floating roof

The following specific conditions apply to the NSPS emissions unit(s) listed above:

Permitting note w/ regard to this NSPS:

The original riveted-construction tank 2 was replaced by a welded-construction internal floating roof tank under AC17-268873, amended August 16, 1996. It was constructed per the requirements of 40 CFR 60 Subpart Kb, utilizing a galvanized primary mechanical shoe seal and a secondary wiper. Tank 11 is a 60,000-barrel gasoline storage tank with an internal floating roof and mechanical shoe seal with a secondary wiper seal constructed and placed in operation in 1999 and subject to the requirements of 40 CFR 60 Subpart Kb.

The following specific conditions apply to the emissions unit(s) listed above:

B.1. All requirements of Title 40, Code of Federal Regulations, Part 60, Subpart Kb (40 CFR 60 Kb), Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) applicable to this source shall be adhered to.
[Rule 62-204.800(7)(b)16., F.A.C.]

B.2. The notification in writing to EPA Administrator shall be submitted to: NSPS Coordinator, Bureau of Air Regulation, Department of Environmental Protection, 2600 Blair Stone Road, Tallahassee, Florida 32301-8241 (as EPA delegated NSPS representative). Copy the DEP Northwest District Office for inspection witnessing.
[Rule 62-204.800(7)(b)16., F.A.C.]

B.3. In accordance with 40 CFR 60.116b(a) Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels*, the owner or operator shall maintain records on site for storage vessel 2 to include the date of construction, the material storage capacity, and type of material stored for the life of these storage vessel(s).
[Rule 62-204.800(7)(b)16., F.A.C.; 40 CFR 60.116b(a)]

Essential Potential to Emit (PTE) Parameters

B.4. Capacity. The maximum allowable gasoline throughput of gasoline is 270 MM gallons per year.
[Rules 62-4.070, 62-4.160(2), 62-210.200(PTE), 62-296.320(1)(a), F.A.C., and AC17-268873]