TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 26, 2011

MR JAMES J CESARIO
AIR QUALITY SPECIALIST
TRANSMONTAIGNE OPERATING COMPANY LP
PO BOX 5660
DENVER CO 80217-5660

Re: Permit Alteration
Permit Number: 44366
Tejano Terminal
Brownsville, Cameron County
Regulated Entity Number: RN100838226
Customer Reference Number: CN603418971
Account Number: CD-0088-C

Dear Mr. Cesario:

This is in response to your letter received April 6, 2011, requesting alteration of the conditions of the above-referenced permit. We understand that you would like to have additional flexibility with respect to the Reid Vapor Pressure in the Operational Limits section of the permit by including the option to do analytical tests on the fuel in lieu of certificates from the supplier. In addition, you have requested that the words "delivering refiner" be replaced with "product owner" in order to more accurately reflects the operations at this site.

As indicated in Title 30 Texas Administrative Code § 116.116(c) [30 TAC § 116.116(c)], and based on our review, Permit Number 44366 is altered. Enclosed are the altered permit conditions to replace those currently attached to your permit. Please attach these to your permit.

No planned maintenance, startup, and shutdown emissions have been reviewed or represented in this application and none are authorized by this permit.

As of July 1, 2008, all analytical data generated by a mobile or stationary laboratory in support of compliance with air permits must be obtained from a NELAC (National Environmental Laboratory Accreditation Conference) accredited laboratory under the Texas Laboratory Accreditation Program or meet one of several exemptions. Specific information concerning which laboratories must be accredited and which are exempt may be found in 30 TAC § 25.4 and § 25.6.

Re: Permit Number: 44366

For additional information regarding the laboratory accreditation program and a list of accredited laboratories and their fields of accreditation, please see the following Web site:

www.tceq.texas.gov/compliance/compliance_support/qa/env_lab_accreditation.html

For questions regarding the accreditation program, you may contact the Texas Laboratory Accreditation Program at (512) 239-3754 or by e-mail at labprgms@tceq.texas.gov.

Your cooperation in this matter is appreciated. If you need further information or have any questions, please contact Mr. Wesley Smith, P.E. at (512) 239-4936 or write to the Texas Commission on Environmental Quality, Office of Permitting and Registration, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,

Steve Hagle, P.E., Director
Air Permits Division
Office of Permitting and Registration
Texas Commission on Environmental Quality

SH/WS/ws

Enclosure

cc: Air Section Manager, Region 15 - Harlingen

Project Number: 164704

SPECIAL CONDITIONS

Permit No. 44366

This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating requirements specified in the special conditions.

FEDERAL APPLICABILITY

1. This facility shall comply with all applicable requirements of U.S. Environmental Protection Agency (EPA) Regulations on Standards of Performance for New Stationary Sources promulgated in Title 40 Code of Federal Regulations Part 60 (40 CFR 60), Subparts A, Kb, and XX; and the National Emission Standards for hazardous Air Pollutants in 40 CFR 63, Subpart BBBBBB. **(03/11)**

STORAGE OF VOLATILE ORGANIC COMPOUNDS (VOC)

2. Storage tanks are subject to the following requirements: The control requirements specified in paragraphs A-D of this condition shall not apply (1) where the VOC has and aggregate partial pressure of less than 0.50 psia at the maximum feed temperature or 95°F, whichever is greater, or (2) to storage tanks smaller than 25,000 gallons or (3) the tanks are fixed roof tanks. **(03/11)**

   A. An internal floating deck or "roof" or equivalent control shall be installed in all tanks. The floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: (1) a liquid-mounted seal, (2) two continuous seals mounted one above the other, or (3) a mechanical shoe seal.

   B. An open-top tank containing a floating roof (external floating roof tank) which uses double seal or secondary seal technology shall be an approved control alternative to an internal floating roof tank provided the primary seal consists of either a mechanical shoe seal or a liquid-mounted seal and the secondary seal is rim-mounted. A weather-shield is not approvable as a secondary seal unless specifically reviewed and determined to be vapor-tight.

   C. For tanks 5003, 5005, and 5006, the permit holder shall perform the visual inspections and seal gap measurements as specified in Title 40 Code of

Federal Regulations § 60.113b (40 CFR § 60.113b) Testing and Procedures (as amended at 54 FR 32973, Aug. 11, 1989) to verify fitting and seal integrity. Records shall be maintained of the dates seals were inspected and seal gap measurements made, results of inspections and measurements made (including raw data), and actions taken to correct any deficiencies noted.

D. The floating roof design shall incorporate sufficient flotation to conform to the requirements of API Code 650 dated November 1, 1998 except that an internal floating cover need not be designed to meet rainfall support requirements and the materials of construction may be steel or other materials.

E. Uninsulated tank exterior surfaces exposed to the sun shall be white or aluminum. Storage tanks must be equipped with permanent submerged fill pipes.

F. The permit holder shall maintain an emissions record which includes calculated emissions of VOC from all storage tanks during the previous calendar month and the past consecutive 12 month period.

The record shall include tank identification number, control method used, tank capacity in barrels, name of the material stored, VOC molecular weight, VOC monthly average temperature in degrees Fahrenheit, VOC vapor pressure at the monthly average material temperature in psia, product throughput for the previous month and year-to-date.

Records of VOC monthly average temperature are not required to be kept for unheated tanks which receive liquids that are at or below ambient temperatures.

Emissions for tanks shall be calculated using: AP-42 "Compilation of Air Pollution Emission Factors, Chapter 7" and the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Storage Tanks."

G. If throughput records are specified in the special conditions of this permit, the holder of this permit may keep such records in lieu of the records required in paragraph F.

3. A. Storage of organic compounds in Tank Nos. 5001, 5002, 5003, 5005, and 5006 are limited to gasoline, ethanol, distillate, or compounds which meet one of the TCEQ Permits by Rule, or organic compounds which meet the requirements of Special Condition No. 4. **(03/11)**

B. Storage of organic compounds in Tank No. 5004 is limited to diesel fuel, or lube oil, or compounds which meet one of the TCEQ Permits by Rule, or compounds which meet the requirements of Special Condition No. 4. **(03/11)**

CHEMICAL FLEXIBILITY:

4. Except as provided for below, the use of compounds at the Tank Nos. 5001, 5002, 5003, 5004, 5005, and 5006 are limited to those identified in the permit application, PI-1 dated December 29, 2009. New compounds may be added through the use of the procedure below, 30 TAC Chapter 106, or 30 TAC 116. **(03/11)**

A. Short-term (pounds per hour [lb/hr]) and annual (TPY) emissions and calculations shall be completed for each chemical at each affected source. Emission rates (ER) shall be calculated in accordance with the following methods, as documented in the permit amendment application PI-1 dated December 29, 2009: AP-42 emission factors and equations to determine tank and loading emissions; TCEQ fugitive emission factors with appropriate control as identified in the guidance document, "Equipment Leak Fugitives" to determine piping fugitive emissions. The calculated ER shall not exceed the maximum allowable emissions rate at any emission point.

B. The Effect Screening Level (ESL) for the compound shall be obtained from the current TCEQ ESL list or by written request to the TCEQ Toxicology Section.

C. The new compounds or chemicals shall serve the same basic function and the emissions shall be from the same location as the emissions from the current materials.

D. All the compounds within a new mixture are known, i.e. the weight percentages of the ingredients add to 100 percent or more.

E. Any air contaminant compound in a new mixture is exempt from the requirements of subparagraph F below if it meets one of the following conditions:

(1) It is emitted at a rate and has a short-term Effects Screening Level (ESL) as stated in the following table; or

Emission Rate (lbs/hr)	Short-term ESL ($\mu g/m^3$)
≤ 0.04	≥ 2 & < 500
≤ 0.10	≥ 500 & $< 3,500$
≤ 0.40	$\geq 3,500$

(2) It has a true vapor pressure at 68°F of less than 0.01 mm Hg.

F. For all other new or increased air contaminants the following procedure shall be completed:

(1) Determine the emission rate (ER) of each air contaminant ingredient including emissions of the same air contaminant from currently authorized materials that may be emitted at the same time from each emission point.

(2) Multiply the emission rate of the air contaminant by the unit impact multiplier for each emission point from the following table to determine the off-property impact (Ground Level Concentration (GLC)) for each emission point.

Emission Point	Unit Impact ($\mu g/m^3$ per lb/hr)
EPN's: 5001, 5002, 5003, & 5006	*116.15*
EPN 5004	*311.98*
EPN 5005	*60.89*

(3) Sum the impacts from each emission point/emission point group to determine a total off-property impact (Total GLC_{MAX}) for the new or increased air contaminant.

(4) Compare the total off-property impact to the ESL for the air contaminant as follows:

Total $GLC_{MAX} \leq ESL_{NEW}$

Where:

Total GLC_{MAX} = the sum of the GLCs from each emission point.

ESL_{NEW} = short-term ESL of new ingredient air contaminant from the most current ESL list published by the TCEQ or as specifically derived by TCEQ Toxicology Section. The ESL shall be obtained in writing prior to the use of the new or increased air contaminant.

G. Short-term emission rates from new or increased air contaminants shall not cause any increases in air contaminant category annual emission rates as listed on the maximum allowable emission rates table (MAERT).

H. The permit holder shall maintain records of the information below and the demonstrations in steps A though C above. The following documentation is required for each compound:

(1) Chemical name(s), composition, and chemical abstract registry number if available.

(2) True vapor pressure at maximum hourly and annual average storage temperature.

(3) Molecular weight.

(4) Storage tanks, loading area, and fugitive areas where the material is to be handled and the emission control device to be utilized.

(5) Date new compound handling commenced.

(6) Material Safety Data Sheet.

(7) Maximum concentration of the chemical in mole percent (or in weight percent for fugitive areas) in the affected facilities.

5. When loading materials with a vapor pressure greater than or equal to 0.5 psia at maximum loading temperature, the loading emissions shall be routed to the flare. The flare shall operate with no less than 98 percent efficiency in disposing of the carbon compounds captured by the collection system.

6. Flares shall be designed and operated in accordance with 40 CFR 60.18 including specifications of minimum heating value of the waste gas, maximum tip velocity, and pilot flame monitoring. If necessary to insure adequate combustion, sufficient fuel gas shall be added to make the gases combustible. An infrared monitor is considered equivalent to a thermocouple for flame monitoring purposes.

VAPOR COMBUSTION UNIT for GASOLINE TERMINALS:

7. The VCU shall be operated with no visible emissions and have a constant pilot flame during all times waste gas could be directed to it. The pilot flame shall be continuously monitored by a thermocouple or an infrared monitor. The time, date, and duration of any loss of pilot flame shall be recorded. Each monitoring device shall be accurate to, and shall be calibrated at a frequency in accordance with, the manufacturer's specifications. **(03/11)**

8. VOC emissions from the VCU shall not exceed 10 milligrams per liter (mg/l) (not to exceed 10 mg/l [0.0834 pound per 1,000 gallons]) of gasoline loaded. **(03/11)**

9. Flare (EPN: FL) will be dismantled prior to installing the new control device (EPN: VCU). Loading operations and associated emissions routed to the flares will be suspended while flare (EPN: FL) is dismantled and until flare (EPN: VCU) is operational. **(03/11)**

LOADING OF VOLATILE ORGANIC COMPOUNDS (VOC)

10. All loading shall be submerged, and rolling 12-month rack throughput records shall be updated on a monthly basis for each product loaded. **(03/11)**

11. The permit holder shall maintain and update monthly an emissions record which includes calculated emissions of VOC from all loading operations over the previous rolling 12 month period. **(03/11)**

    A. The record shall include the loading spot, control method used, quantity loaded in gallons, name of the liquid loaded, vapor molecular weight, liquid temperature in degrees Fahrenheit, liquid vapor pressure at the liquid temperature in psia, liquid throughput for the previous month and rolling 12 months to date.

    B. Records of VOC temperature are not required to be kept for liquids loaded from unheated tanks which receive liquids that are at or below ambient temperatures.

    C. Emissions shall be calculated using the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Loading Operations."

12. All lines and connectors shall be visually inspected for any defects prior to hookup. Lines and connectors that are visibly damaged shall be removed from service operations shall cease immediately upon detection of any liquid leaking from the lines or connections. **(03/11)**

13. At all times when product with greater than 0.5 psia is being loaded, the loading rack vapor collection system shall vent to VCU. **(03/11)**

14. Each tank truck shall pass vapor-tight testing every 12 months using the methods described in 40 CFR 60, Subpart XX. The permit holder shall not allow a tank truck to be filled unless it has passed a leak-tight test within the past year as evidenced by a certificate which shows the date the tank truck last passed the leak-tight test required by this condition and the identification number of the tank truck. **(03/11)**

OPERATIONAL LIMITS:

15. The loading of gasoline is limited to gasoline meeting the monthly Reid Vapor Pressure (RVP) standards specified in the most current version of ASTM D4814. **(03/11)**

16. The holder of this permit shall obtain the RVP data provided by the product owner for each batch of gasoline delivered to the terminal. Gasoline RVP data shall be reduced to monthly weighted averages for purposes of determining compliance with the conditions of this permit. Analytical test results from the testing of each receipt (batch) of product are acceptable in lieu of certificates from the product owner. **(04/11)**

17. The benzene content of any grade of gasoline processed at this terminal shall not exceed 4.9 percent by weight in the liquid. Gasoline shall be analyzed for benzene two times per year. One test shall be during the summer (May 1 - September 15) and the other test shall be during the winter (November 1 - February 29). The record shall report benzene content for all grades of gasoline. Gasoline analyses (laboratory certificates of analysis) from the product owner are acceptable in place of on-site analysis. **(04/11)**

18. The terminal must comply with all applicable requirements of 40 CFR Part 63, Subpart R relating to the recordkeeping and reporting requirements for claiming the exemption under 40 CFR § 63.420(a). **(03/11)**

Dated: April 26, 2011

04/07/2011 ----------NSR IMS - PROJECT RECORD ----------

PROJECT#: 164704 PERMIT#: 44366 STATUS: PENDING DISP CODE: _____
RECEIVED: 04/06/2011 PROJTYPE: REVISION AUTHTYPE: CONSTRUCT ISSUED DT: _____
RENEWAL: 03/03/2021
PROJECT ADMIN NAME: DOCUMENTATION OF RVP OF GASOLINE - CHEMICAL PROJECT WORKED BY M/A
PROJECT TECH NAME: TEJANO TERMINAL

Assigned Team: MECH/AG TEAM

STAFF ASSIGNED TO PROJECT:

HICKMAN , SHARON	- REVIEWR1_2 -	AP INITIAL REVIEW
TEAM LEADER , M/A	- REVIEW ENG -	MECH/AG TEAM

CUSTOMER INFORMATION (OWNER/OPERATOR DATA)
ISSUED TO: TRANSMONTAIGNE OPERATING COMPANY LP
COMPANY NAME: TransMontaigne Operating Company L.P.
CUSTOMER REFERENCE NUMBER: **CN603418971**

REGULATED ENTITY/SITE INFORMATION
REGULATED ENTITY NUMBER: **RN100838226** ACCOUNT: CD0088C
PERMIT NAME: TEJANO TERMINAL

REGULATED ENTITY LOCATION: 6200 STATE HWY 48
REGION 15 - HARLINGEN NEAR CITY: BROWNSVILLE COUNTY: CAMERON

To JWS 4/11/11

CONTACT DATA

CONTACT NAME: MR JAMES J CESARIO CONTACT ROLE: RESPONSIBLE OFFICIAL
JOB TITLE: AIR QUALITY SPECIALIST ORGANIZATION: TRANSMONTAIGNE OPERATING COMPANY LP
MAILING ADDRESS: PO BOX 5660 , DENVER, CO, 80217-5660
PHONE: (303) 860-5041 Ext: 0
FAX: (303) 626-8228 Ext: 0
EMAIL:JCESARIO@TRANSMONTAIGNE.COM

PROJECT NOTES:

04/07/2011	DFC 4/7/11
04/07/2011	PROJECT GIVEN TO LMASON FOR STAFF ASSIGNMENT

PERMIT NOTES:

04/10/2008	INCORPORATE OR REFERENCE PBR 84325 AT NEXT AMENDMENT OR RENEWAL
08/26/2009	CONSOLIDATE OR REFERENCE STANDARD PERMIT 90129 AT NEXT AMENDMENT OR RENEWAL
09/11/2009	CONSOLIDATE OR REFERENCE PBR 84325 AT NEXT AMENDMENT OR RENEWAL

TRACKING ELEMENTS:

TE Name	Start Date	Complete Date
APIRT RECEIVED PROJECT (DATE)	04/06/2011	
APIRT TRANSFERRED PROJECT TO TECHNICAL STAFF (DATE)	04/07/2011	

CENTRAL REGISTRY UPDATED
COMPLIANCE HISTORY REVIEW COMPLETED (DATE)
DEFICIENCY CYCLE
DRAFT PERMIT RFC SENT TO REGION (DATE)
EMISSIONS MODELING CYCLE DONE BY APPLICANT
FINAL PACKAGE REWORK CYCLE
FINAL PACKAGE TO SECTION MANAGER FOR REVIEW (DATE)
FINAL PACKAGE TO TEAM LEADER OR SUPERVISOR FOR REVIEW (DATE)
MODELING AUDIT CYCLE
PROJECT RECEIVED BY ENGINEER (DATE)
PROJECT RECEIVED BY TECHNICAL STAFF FROM APIRT (DATE)
WORKING DRAFT PERMIT REVIEW CYCLE
WPO FINAL PACKAGE CYCLE

Permit Alteration
Source Analysis & Technical Review

Company	**TransMontaigne Operating Company L.P.**	Permit Number	**44366**
City	**Brownsville**	Project Number	**164704**
County	**Cameron**	Account Number	**CD-0088-C**
Project Type	**Revision**	Regulated Entity Number	**RN100838226**
Project Reviewer	**Mr. Wesley Smith, P.E.**	Customer Reference Number	**CN603418971**
Site Name	**Tejano Terminal**		

Project Overview

TransMontaigne Operating Company L.P. operates a bulk gasoline terminal at 6200 State Highway 48, Brownsville, Cameron County. The company was recently issued a permit amendment and renewal. Based on current market demands and the way gasoline is now shipped, the company requests that the language in the permit be modified to allow for alternative demonstration of compliance with the Reid Vapor Pressure (RVP) recordkeeping. The gasoline that is shipped may be a mixture of various sources (different owners), and records of gasoline analyses from several sources may not reflect actual RVP. The company requests that additional flexibility be included in the permit to allow for analytical testing be done upon receipt of a ship or barge to determine actual RVP. In addition, the company requests that the phrase "delivering refinery" be changed to "product owner" because the gasoline may come by pipeline from a refinery or be delivered by a marine vessel. The company will still have the option to use a laboratory certificate of analysis, if the gasoline comes exclusively from one supplier. If the gasoline comes from vessels that may have been fueled at different locations causing the fuel to be comingled, the company would like the flexibility to perform the laboratory analysis for demonstration of compliance with the conditions of the permit.

Permit Concurrence and Related Authorization Actions

Is the applicant is in agreement with special conditions?	**Yes**
Company representative(s):	**Mr. James Cesario, Air Quality Specialist**
Contacted Via:	**phone**
Date of contact:	**04/12/2011**
Other permit(s) or permits by rule affected by this action:	**No**
List permit and/or PBR number(s) and actions required or taken:	**n/a**

Project Reviewer	Date	Team Leader/Section Manager/Backup	Date
4/14/11		4/18/11	

TRANSMONTAIGNE

April 5, 2011

Sent via UPS Tracking Number 1Z 1V0 21V 01 9510 7370

Air Permits Initial Review Team , TCEQ
Mail Code 161, 12100 Park 35 Circle
Building C, Third Floor, Room 300 W
Austin, Texas 78753

Re: TransMontaigne Operating Company L.P. – Tejano Terminal
Permit Alteration Request – Documentation for RVP of Gasoline
Customer Number: CN-603418971
Regulated Entity Number: RN-100838226
Account Number CD-0088-C
Permit Number: 44366

Dear Sir:

TransMontaigne Operating Company L.P. (TransMontaigne) operates the Tejano Terminal, a bulk products storage facility located in Brownsville, Cameron County, Texas. The Texas Commission on Environmental Quality (TCEQ) renewed Permit Number 44366 for this facility on February 23, 2011. TransMontaigne is writing to ask TCEQ for a permit alteration to provide additional flexibility with respect to the recordkeeping provisions for the Reid Vapor Pressure (RVP) of gasoline stored and/or loaded at this site. TransMontaigne has listed the desired changes in "redline/strikeout" format below.

Existing Permit Language

16. The holder of this permit shall obtain the RVP data provided by the ~~delivering refinery~~ product owner for each batch of gasoline delivered to the terminal. Gasoline RVP data shall be reduced to monthly weighted averages for purposes of determining compliance with the conditions of this permit. Analytical test results from the testing of each receipt (batch) of product are acceptable in lieu of certificates from the product owner.

17. The benzene content of any grade of gasoline processed at this terminal shall not exceed 4.9 percent by weight in the liquid. Gasoline shall be analyzed for benzene two times per year. One test shall be during the summer (May 1 - September 15) and the other test shall be during the winter (November 1 - February 29). The record shall report benzene content for all grades of gasoline. Gasoline analyses (laboratory certificates of analysis) from the ~~delivering refinery~~ product owner are acceptable in place of on-site analysis.

Issue

TransMontaigne's Tejano Terminal is equipped to receive gasoline via pipeline or marine vessel. For marine vessels, the gasoline could come from anywhere in the world, not necessarily a refinery. For example, the gasoline could have been stored at another bulk gasoline terminal. The originating terminal could have commingled gasoline from multiple refineries before the gasoline was loaded on a vessel for shipment to the Tejano Terminal. Therefore, it some situations, while it may be possible to track down data from every refinery that could have distilled the gasoline, in practice it will be difficult.

TransMontaigne would like to obtain some flexibility in the permit. If a batch of gasoline comes exclusively from one supplier, TransMontaigne would like to have the option of using refinery data. In other situations, however, TransMontaigne would like the flexibility to simply test a sample of the product on the vessel and use the analytical results from the testing. By providing flexibility in the permit, TCEQ will allow TransMontaigne to use

1670 Broadway • Suite 3100 • Denver, CO 80202 • 303-626-8200 (phone) • 303-626-8228 (fax)
Mailing Address: • P.O. Box 5660 • Denver, CO 80217-5660
www.transmontaigne.com

the most cost-effective method to obtain the necessary information while at the same time compiling the highest quality of data to assure TCEQ that the terminal is complying with all air quality requirements.

Regulatory Basis

30 TAC 11.116(c) Permit Alteration.

(1) A permit alteration is:
  (A) a decrease in allowable emissions; or TransMontaigne is not seeking to use this option.
  (B) any change from a representation in an application, general condition, or special condition in a permit that does not cause:
    (i) a change in the method of control of emissions; There will be no change in the control device at the site if this alteration is approved.
    (ii) a change in the character of emissions; or The constituents that make up gasoline (and therefore gasoline emissions) remain the same regardless of what documentation is compiled on the RVP of the gasoline.
    (iii) an increase in the emission rate of any air contaminant. The change will not result in an increase in emissions.

(2) Requests for permit alterations that must receive prior approval by the executive director are those that:
  (A) result in an increase in off-property concentrations of air contaminants; There will be no increases in off property concentrations of air emission if this permit alteration is approved.
  (B) involve a change in permit conditions; or By this letter TransMontaigne is requesting approval from the executive director.
  (C) affect facility or control equipment performance. The alterations to the permit language will not affect the facility or control equipment performance.

(3) The executive director shall be notified in writing of all other permit alterations not specified in paragraph (2) of this subsection. By this letter, TransMontaigne is requesting prior approval from the executive director.

(4) A request for permit alteration shall include information sufficient to demonstrate that the change does not interfere with the owner or operator's previous demonstrations of compliance with the requirements of §116.111(a)(2)(C) of this title. §116.111(a)(2)(C) of this title deals with BACT. BACT for gasoline loading racks is not based on the source of documentation for the RVP of gasoline loaded, therefore should this permit alteration be approved it does not interfere with any previous demonstration of compliance.

(5) Permit alterations are not subject to the requirements of §116.111(a)(2)(C) of this title. Understood.

TransMontaigne requests that TCEQ review this permit alteration request and respond in writing. If you have any questions, or need any further information, please do not hesitate to contact me at (303) 860 – 5041. Thank you for your assistance in this matter.

Sincerely,

TRANSMONTAIGNE OPERATING COMPANY, L.P.

James J Cesario
Air Quality Specialist

cc: Mr. Kevin Garcia, TransMontaigne
Mr. Ed Lubbers, TransMontaigne
ESOH File AR.003.BROS

SPECIAL CONDITIONS

Permit No. 44366

This permit authorizes emissions only from those points listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" and the facilities covered by this permit are authorized to emit subject to the emission rate limits on that table and other operating requirements specified in the special conditions.

FEDERAL APPLICABILITY

1. This facility shall comply with all applicable requirements of U.S. Environmental Protection Agency (EPA) Regulations on Standards of Performance for New Stationary Sources promulgated in Title 40 Code of Federal Regulations Part 60 (40 CFR 60), Subparts A, Kb, and XX; and the National Emission Standards for hazardous Air Pollutants in 40 CFR 63, Subpart BBBBBB. **(03/11)**

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   A. An internal floating deck or "roof" or equivalent control shall be installed in all tanks. The floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: (1) a liquid-mounted seal, (2) two continuous seals mounted one above the other, or (3) a mechanical shoe seal.

   B. An open-top tank containing a floating roof (external floating roof tank) which uses double seal or secondary seal technology shall be an approved control alternative to an internal floating roof tank provided the primary seal consists of either a mechanical shoe seal or a liquid-mounted seal and the secondary seal is rim-mounted. A weather-shield is not approvable as a secondary seal unless specifically reviewed and determined to be vapor-tight.

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D. The floating roof design shall incorporate sufficient flotation to conform to the requirements of API Code 650 dated November 1, 1998 except that an internal floating cover need not be designed to meet rainfall support requirements and the materials of construction may be steel or other materials.

E. Uninsulated tank exterior surfaces exposed to the sun shall be white or aluminum. Storage tanks must be equipped with permanent submerged fill pipes.

F. The permit holder shall maintain an emissions record which includes calculated emissions of VOC from all storage tanks during the previous calendar month and the past consecutive 12 month period.

The record shall include tank identification number, control method used, tank capacity in barrels, name of the material stored, VOC molecular weight, VOC monthly average temperature in degrees Fahrenheit, VOC vapor pressure at the monthly average material temperature in psia, product throughput for the previous month and year-to-date.

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Emissions for tanks shall be calculated using: AP-42 "Compilation of Air Pollution Emission Factors, Chapter 7" and the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Storage Tanks."

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B. The Effect Screening Level (ESL) for the compound shall be obtained from the current TCEQ ESL list or by written request to the TCEQ Toxicology Section.

C. The new compounds or chemicals shall serve the same basic function and the emissions shall be from the same location as the emissions from the current materials.

D. All the compounds within a new mixture are known, i.e. the weight percentages of the ingredients add to 100 percent or more.

E. Any air contaminant compound in a new mixture is exempt from the requirements of subparagraph F below if it meets one of the following conditions:

(1) It is emitted at a rate and has a short-term Effects Screening Level (ESL) as stated in the following table; or

Emission Rate (lbs/hr)	Short-term ESL ($\mu g/m^3$)
≤ 0.04	≥ 2 & < 500
≤ 0.10	≥ 500 & $< 3,500$
≤ 0.40	$\geq 3,500$

(2) It has a true vapor pressure at 68 °F of less than 0.01 mm Hg.

F. For all other new or increased air contaminants the following procedure shall be completed:

(1) Determine the emission rate (ER) of each air contaminant ingredient including emissions of the same air contaminant from currently authorized materials that may be emitted at the same time from each emission point.

(2) Multiply the emission rate of the air contaminant by the unit impact multiplier for each emission point from the following table to determine the off-property impact (Ground Level Concentration (GLC)) for each emission point.

Emission Point	Unit Impact ($\mu g/m^3$ per lb/hr)
EPN's: 5001, 5002, 5003, & 5006	*116.15*
EPN 5004	*311.98*
EPN 5005	*60.89*

(3) Sum the impacts from each emission point/emission point group to determine a total off-property impact (Total GLC_{MAX}) for the new or increased air contaminant.

(4) Compare the total off-property impact to the ESL for the air contaminant as follows:

Total $GLC_{MAX} \leq ESL_{NEW}$

Where:

Total GLC_{MAX} = the sum of the GLCs from each emission point.

ESL_{NEW} = short-term ESL of new ingredient air contaminant from the most current ESL list published by the TCEQ or as specifically derived by TCEQ Toxicology Section. The ESL shall be obtained in writing prior to the use of the new or increased air contaminant.

G. Short-term emission rates from new or increased air contaminants shall not cause any increases in air contaminant category annual emission rates as listed on the maximum allowable emission rates table (MAERT).

H. The permit holder shall maintain records of the information below and the demonstrations in steps A though C above. The following documentation is required for each compound:

(1) Chemical name(s), composition, and chemical abstract registry number if available.

(2) True vapor pressure at maximum hourly and annual average storage temperature.

(3) Molecular weight.

(4) Storage tanks, loading area, and fugitive areas where the material is to be handled and the emission control device to be utilized.

(5) Date new compound handling commenced.

(6) Material Safety Data Sheet.

(7) Maximum concentration of the chemical in mole percent (or in weight percent for fugitive areas) in the affected facilities.

5. When loading materials with a vapor pressure greater than or equal to 0.5 psia at maximum loading temperature, the loading emissions shall be routed to the flare. The flare shall operate with no less than 98 percent efficiency in disposing of the carbon compounds captured by the collection system.

6. Flares shall be designed and operated in accordance with 40 CFR 60.18 including specifications of minimum heating value of the waste gas, maximum tip velocity, and pilot flame monitoring. If necessary to insure adequate combustion, sufficient fuel gas shall be added to make the gases combustible. An infrared monitor is considered equivalent to a thermocouple for flame monitoring purposes.

VAPOR COMBUSTION UNIT for GASOLINE TERMINALS:

7. The VCU shall be operated with no visible emissions and have a constant pilot flame during all times waste gas could be directed to it. The pilot flame shall be continuously monitored by a thermocouple or an infrared monitor. The time, date, and duration of any loss of pilot flame shall be recorded. Each monitoring device shall be accurate to, and shall be calibrated at a frequency in accordance with, the manufacturer's specifications. **(03/11)**

8. VOC emissions from the VCU shall not exceed 10 milligrams per liter (mg/l) (not to exceed 10 mg/l [0.0834 pound per 1,000 gallons]) of gasoline loaded. **(03/11)**

9. Flare (EPN: FL) will be dismantled prior to installing the new control device (EPN: VCU). Loading operations and associated emissions routed to the flares will be suspended while flare (EPN: FL) is dismantled and until flare (EPN: VCU) is operational. **(03/11)**

LOADING OF VOLATILE ORGANIC COMPOUNDS (VOC)

10. All loading shall be submerged, and rolling 12-month rack throughput records shall be updated on a monthly basis for each product loaded. **(03/11)**

11. The permit holder shall maintain and update monthly an emissions record which includes calculated emissions of VOC from all loading operations over the previous rolling 12 month period. **(03/11)**

    A. The record shall include the loading spot, control method used, quantity loaded in gallons, name of the liquid loaded, vapor molecular weight, liquid temperature in degrees Fahrenheit, liquid vapor pressure at the liquid temperature in psia, liquid throughput for the previous month and rolling 12 months to date.

    B. Records of VOC temperature are not required to be kept for liquids loaded from unheated tanks which receive liquids that are at or below ambient temperatures.

    C. Emissions shall be calculated using the TCEQ publication titled "Technical Guidance Package for Chemical Sources - Loading Operations."

12. All lines and connectors shall be visually inspected for any defects prior to hookup. Lines and connectors that are visibly damaged shall be removed from service operations shall cease immediately upon detection of any liquid leaking from the lines or connections. **(03/11)**

13. At all times when product with greater than 0.5 psia is being loaded, the loading rack vapor collection system shall vent to VCU. **(03/11)**

14. Each tank truck shall pass vapor-tight testing every 12 months using the methods described in 40 CFR 60, Subpart XX. The permit holder shall not allow a tank truck to be filled unless it has passed a leak-tight test within the past year as evidenced by a certificate which shows the date the tank truck last passed the leak-tight test required by this condition and the identification number of the tank truck. **(03/11)**

OPERATIONAL LIMITS:

15. The loading of gasoline is limited to gasoline meeting the monthly Reid Vapor Pressure (RVP) standards specified in the most current version of ASTM D4814. **(03/11)**

16. The holder of this permit shall obtain the RVP data provided by the delivering refinery for each batch of gasoline delivered to the terminal. Gasoline RVP data shall be reduced to monthly weighted averages for purposes of determining compliance with the conditions of this permit. **(03/11)**

17. The benzene content of any grade of gasoline processed at this terminal shall not exceed 4.9 percent by weight in the liquid. Gasoline shall be analyzed for benzene two times per year. One test shall be during the summer (May 1 - September 15) and the other test shall be during the winter (November 1 - February 29). The record shall report benzene content for all grades of gasoline. Gasoline analyses (laboratory certificates of analysis) from the delivering refiner are acceptable in place of on-site analysis. **(03/11)**

18. The terminal must comply with all applicable requirements of 40 CFR Part 63, Subpart R relating to the recordkeeping and reporting requirements for claiming the exemption under 40 CFR § 63.420(a). **(03/11)**

Dated: 03/03/2011