

FULL COMPLIANCE EVALUATION CHECKLIST

AIRS ID 0110069-020-AC	OWNER Transmontaigne Terminals, LLC	FACILITY NAME Transmontaigne Port Everglades, North Terminal
☒ TITLE V	☐ SYNTHETIC MINOR	DATE OF THIS FCE 06/29/2012
☐ TITLE V MEGA-SITE*	☐ OTHER	DATE OF LAST FCE 09/21/2010

*Facility with a large number of complex emissions units. It is more reasonable to evaluate a Title V Mega-Site once every 3 years instead of once every 2 years.

REVIEW OF ALL REQUIRED REPORTS

PERIODIC REPORTS		COMMENTS
☒ DONE ☐ N/A	Annual operating report: 5/5/11,	
☒ DONE ☐ N/A	Statement of compliance: 3/28/11, 2/14/12	
☒ DONE ☐ N/A	Annual <u>See Inspections</u> : 6/27/2012	
☒ DONE ☐ N/A	Semi-annual: 2/15/12, 8/2/11, 3/28/11	
☐ DONE ☐ N/A	Quarterly:	
☐ DONE ☐ N/A	Other :	
☐ DONE ☐ N/A	Other :	

CONTINUOUS EMISSION MONITOR REPORTS		COMMENTS
☒ DONE ☐ N/A	Quarterly excess emissions: 11/5/10, 3/28/11, 4/22/11, 8/02/11, 11/03/11, 02/15/12, 05/09/12	
☒ DONE ☐ N/A	Semi-annual: 2/15/12, 8/2/11, 3/28/11	
☐ DONE ☐ N/A	RATA	
☐ DONE ☐ N/A	CGA	
☐ DONE ☐ N/A	Other :	
☐ DONE ☐ N/A	Other :	

ASSESSMENT OF CONTROL DEVICE AND PROCESS OPERATING CONDITIONS

☐ OFF-SITE ASSESSMENT		(Describe the off-site assessment in comments)		
☒ ON-SITE ASSESSMENT		(Document the on-site inspection below)		
DATE OF INSPECTION	DATE OF INSPECTION REPORT	My office maintains the inspection report...		
		...in the ARMS database through EASIIR.	...with the paper or electronic compliance files	...in another location (specify).
6/27/2012	6/27/2012	☒	☒	☒ Posse
		☐	☐	☐
		☐	☐	☐
		☐	☐	☐

FULL COMPLIANCE EVALUATION CHECKLIST

REVIEW OF TESTS AND RECORDS

TESTS, OBSERVATIONS AND RECORDS		COMMENTS
☒ DONE ☐ N/A	Visible emission observation(s)	09/07/2011 VE Boiler EU 038
☒ DONE ☐ N/A	Review of facility records and logs	During annual inspection
☒ DONE ☐ N/A	Assessment of process parameters (feed rates, process rates, raw material compositions, etc.)	During annual inspection
☒ DONE ☐ N/A	Assessment of control equipment performance parameters (water flow rates, pressure drops, temperatures, ESP power levels, etc.)	During annual inspection
☒ DONE ☐ N/A	Stack test(s):	06/15/2012 RATA Test for VRU EU 031
☐ DONE ☐ N/A	Other :	
☐ DONE ☐ N/A	Other :	

COMPLIANCE MONITORING (CM) INFORMATION

CM ELEMENT	My office maintains this information...			
	...electronically, in the ARMS database.	...in the permit.	...in the inspection report.	...in another location (specify).
Facility information	☒	☒	☒	☐
Applicable requirements	☐	☒	☐	☐
Inventory of emission units	☒	☒	☐	☐
Enforcement history	☒	☐	☒	☒ Posse
Compliance activities	☒	☐	☒	☐
Findings and recommendations	☐	☐	☒	☐
COMMENTS				

OTHER COMMENTS

Prepared by: C. Fernandez_____

Date: 6/29/2012_____

Reviewed by: _____

Date: _____

INSPECTION REPORT

SITE NAME:	AIRS ID:
TRANSMONTAIGNE - NORTH TERMINAL	0110069
OWNER/COMPANY NAME:	COUNTY:
TRANSMONTAIGNE TERMINALS, LLC	BROWARD
SITE ADDRESS:	TITLE V:
PT EVERGLADES/2401 EISENHOWER	Yes
ACTIVITY CODE:	INSPECTION DATE:
INS2 - COMPLIANCE INSPECTION WALK THROUGH	6/27/2012

SECTION I: FACILITY CONTACT INFORMATION			
Contact Name	Title	Phone	Email Address
Casey Brouwer	Terminal Mgr.	954-355-4212	

SECTION II: FACILITY-WIDE CONDITIONS (STATUS)	COMMENTS
OBJECTIONABLE ODORS: IN COMPLIANCE	
PM AND VE: IN COMPLIANCE	
UNREGULATED EU's: IN COMPLIANCE	
INSIGNIFICANT EU's: IN COMPLIANCE	
VOC's & ORGANIC SOLVENTS: IN COMPLIANCE	
OTHER NON-EU REQUIREMENTS: IN COMPLIANCE	
BASED ON THE ABOVE, THE FACILITY-WIDE COMPLIANCE CONDITION IS: IN COMPLIANCE	

SECTION III: REGULATED EMISSION UNIT(S) CONDITIONS				
AIRS ID	EU#	Emission Unit Description	EU Class	ARMS Status
0110069	29	Hot Oil Heaters Nos. 1 and 5	Regulated Emissions Unit	ACTIVE
Grouping		EU Compliance Status		Comments
		IN COMPLIANCE		
SCC:		10200502	SCC Units:	1000 Gallons Distillate Oil Burned
Process/Fuel Description:		External Combustion Boilers; Industrial; Distillate Oil; 10-100 Million Btu/hr **;		
Segment Description:				
SCC:		10200602	SCC Units:	Million Cubic Feet Natural Gas Burned

Process/Fuel Description:	External Combustion Boilers; Industrial; Natural Gas; 10-100 Million Btu/hr;		
Segment Description:			
Permit Condition	Observations		
Essential Potential to Emit (PTE) Parameters. Capacity. The heaters are rated at a capacity of 13.24 MMBTU/heat input per heater per hour. [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE)] Hours of Operation. This emissions unit is allowed to operate 8,760 hours/year while using natural gas or fuel oil with sulfur content less than 0.05 percent by weight. The hours of operation is limited to 5,500 hours /year while using fuel with sulfur content within 0.05 -0.5 percent by weight . [Rule 62-210.200(PTE), F.A.C., Permit AC 06-265705] Reporting Period. The owner or operator subject to the fuel oil sulfur limits, shall submit reports to the EPD each six-month period. All reports shall be submitted to the EPD and shall be postmarked by the 30th day following the end of the reporting period. In instances, where a unit combusts only natural gas, the affected unit may report excess emissions, or lack thereof, on an annual basis. [40 CFR 60.48c(d), (j), EPA Determination on Reduced Reporting Requirements for Small Clean Units Subject to Subpart Dc (September 9, 1996)] Report Content. The SO2 emissions reports shall include the following information, as applicable. (1) Calendar dates covered in the reporting period. (2) Each 30-day average SO2 emission rate (nj/J or lb/million Btu), or 30-day average sulfur content (weight percent), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken. (3) ¿(10) [Reserved] (11) If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification. Fuel supplier certification shall include the following information for distillate oil: The name of the oil supplier; and A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil by the American Society for Testing and Materials in ASTM D396¿78, 89, 90, 92, 96, or 98, ``Standard Specification for Fuel Oils¿¿ In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period. [40 CFR 60.48c(e)] Fuel Records. The owner or operator shall record and maintain records of the amounts of each fuel combusted during each day for a period of two years following the date of such record. Alternatively (Approved by EPA). The requirement for maintaining daily records may be reduced to monthly providing: 1. The only fuel used is natural gas, or fuel oil with sulfur content less than 0.5 % and compliance is demonstrated using supplier¿s certifications. Documents may be in the form of fuel bills, meter readings, or other records that adequately document fuel usage. 2. The owner or operator shall promptly notify EPD of any anticipated and actual switches in fuel use. 3. If the fuel oil sulfur content ever exceeds 0.5 %, the recordkeeping frequency will immediately revert to daily, in order to determine whether the 30-day rolling average sulfur content of the fuel exceed 0.5 %. [40 CFR 60.48c (g) and (i), EPA Determination on Reduced Record-keeping Requirements for Small Clean Units Subject to Subpart Dc (June 13, 1997)] Emission Limitations and Standards Sulfur Dioxide Emissions. The owner or operator shall not combust oil that contains greater than 0.5 weight percent sulfur. [40 CFR 60.42c (d)]			Eus 29 has remained the same. The heates do not require a VE tests since natural gas is used as fuel. In compliance.

AIRS ID	EU#	Emission Unit Description	EU Class	ARMS Status
0110069	31	Petroleum Products Loading Rack with VRU	Regulated Emissions Unit	ACTIVE
Grouping		EU Compliance Status		Comments
		IN COMPLIANCE		
SCC:		40400153	SCC Units:	1000 Gallons Petroleum Liquid Transferred
Process/Fuel Description:		Petroleum and Solvent Evaporation; Petroleum Liquids Storage (non-Refinery); Bulk Terminals; Vapor Control Unit Losses;		

Segment Description:			
SCC:	40400154	SCC Units:	1000 Gallons Petroleum Liquid Transferred
Process/Fuel Description:	Petroleum and Solvent Evaporation; Petroleum Liquids Storage (non-Refinery); Bulk Terminals; Tank Truck Vapor Leaks;		
Segment Description:	gasoline/ distillate uncontrolled losses		
Permit Condition		Observations	
Throughput. The throughput shall not exceed 500,000,000 gallons per year of gasoline and 500,000,000 gallons per year of distillate, calculated on a twelve-month rolling average basis Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. Loading Rack Emissions. Emissions to the atmosphere from the vapor collection and processing systems due to the loading of gasoline cargo tanks shall not exceed 10 milligrams of total organic compounds per liter of gasoline loaded. [40 CFR 63.422(b)] The owner or operator shall obtain the vapor tightness documentation for each gasoline tank truck which is to be loaded at the affected facility. The vapor tightness documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information: Compliance Assurance Monitoring (CAM) CAM Requirements. This emissions unit is subject to the Compliance Assurance Monitoring (CAM) requirements contained in Appendix A of this permit. 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.]		In compliance. The loading rack throughput until May 2012 is 28,822,601 for both gas and ethanol and 65,629,316 for distillate. Both records were available and kept for five years. The emissions for the loading rack where measured during the compliance VRU test conducted on 2010 for the renewal, and it was below the 10 milligrams. Yearly a RATA test is conducted to verify the CEMS on the VRU test. The records for the vapor tightness were available and are kept for 5 years.	

AIRS ID	EU#	Emission Unit Description	EU Class	ARMS Status
0110069	33	Fixed Roof Tanks 201,202,204,205,208-210,211, 225-230	Regulated Emissions Unit	ACTIVE
Grouping		EU Compliance Status	Comments	
		IN COMPLIANCE		
SCC:	40400199	SCC Units:	1000 Gallons Material Throughput	
Process/Fuel Description:	Petroleum and Solvent Evaporation; Petroleum Liquids Storage (non-Refinery); Bulk Terminals; See Comment **;			
Segment Description:				
Permit Condition				Observations
(Throughput. The throughput shall not exceed 500,000,000 gallons per year of distillates, calculated on a twelve-month rolling average basis. [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE)] Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.] Product Records. The owner or operator shall keep records to verify compliance with: (1) The throughput limit in gallons per year based on a twelve-month rolling average basis, and (2) the maximum vapor pressure of products stored in each tank. [Rule 62-4.070(3), F.A.C.] Vapor Pressure. The owner or operator shall maintain estimated monthly maximum vapor pressure records for liquid stored in the tanks. Available data on the typical Reid vapor pressure and the maximum expected storage temperature of the stored product may be used to determine the maximum true vapor pressure				Records were available and maintained for five years and with the content of the tank as well.

from nomographs contained in API Bulletin 2517. [Rule 62-4.070(3), F.A.C.]	
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AIRS ID	EU#	Emission Unit Description	EU Class	ARMS Status
0110069	37	Miscell. VOC Sources (uncontrolled Asphalt loading, valves,)	Regulated Emissions Unit	ACTIVE
Grouping		EU Compliance Status	Comments	
		IN COMPLIANCE	Records maintained for leak detection.	
SCC:		40400151	SCC Units:	1000 Gallons Petroleum Liquid Transferred
Process/Fuel Description:		Petroleum and Solvent Evaporation; Petroleum Liquids Storage (non-Refinery); Bulk Terminals; Valves, Flanges, and Pumps;		
Segment Description:				
SCC:		40400199	SCC Units:	1000 Gallons Material Throughput
Process/Fuel Description:		Petroleum and Solvent Evaporation; Petroleum Liquids Storage (non-Refinery); Bulk Terminals; See Comment **;		
Segment Description:		uncontrolled asphalt loading		

AIRS ID	EU#	Emission Unit Description	EU Class	ARMS Status
0110069	38	Boiler No.1	Regulated Emissions Unit	ACTIVE
Grouping		EU Compliance Status	Comments	
		IN COMPLIANCE		
SCC:		10200501	SCC Units:	1000 Gallons Distillate Oil (No. 1 & 2) Burned
Process/Fuel Description:		External Combustion Boilers; Industrial; Distillate Oil; Grades 1 and 2 Oil;		
Segment Description:				
SCC:		10200602	SCC Units:	Million Cubic Feet Natural Gas Burned
Process/Fuel Description:		External Combustion Boilers; Industrial; Natural Gas; 10-100 Million Btu/hr;		
Segment Description:				

Permit Condition	Observations
Capacity. The rated capacity of the boiler is 8.375 MMBTU/hr. [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE)] Hours of Operation. This emissions unit is allowed to operate 8,760 hours/year while using natural gas or fuel oil with sulfur content less than or equal to 0.05 percent by weight. The hours of operation is limited to 400 hours /year while using fuel with sulfur content greater than 0.05 % and less than or equal to 0.5 % by weight . [Rule 62-210.200(PTE), F.A.C., BACT Determination for Small Boiler by FDEP, dated September 28, 1998] Emission Limitations and Standards Visible Emissions. Visible emissions shall not exceed 20 percent opacity except for one six-minute period per hour during which opacity shall not exceed 27 percent. [Rule 62-296.406(1), F.A.C] Particulate Matter (PM) and Sulfur Dioxide (SO2) Emissions. To minimize PM and SO2 emissions, the boiler is permitted to fire fuel oil with sulfur content greater than 0.05% and less than or equal to 0.5% sulfur (wt.) for up to 400 hours per year when natural gas is unavailable. [Rule 62-296.406(2), (3), F.A.C, BACT Determination for Small Boiler by FDEP, dated September 28, 1998]	EU 38 has remained the same. Hours of operations are not restricted since it uses natural gas. The last VE test was conducted on 9/27/2011. In compliance.

AIRS ID	EU#	Emission Unit Description	EU Class	ARMS Status
0110069	40	Tanks with Internal Floaters (203,207,212-218,220 & 223)	Regulated Emissions Unit	ACTIVE
Grouping		EU Compliance Status		Comments
		IN COMPLIANCE		
SCC:		40400170	SCC Units:	1000 Gallon-Years Liquid Storage Capacity
Process/Fuel Description:		Petroleum and Solvent Evaporation; Petroleum Liquids Storage (non-Refinery); Bulk Terminals; Specify Liquid: Standing Loss - Int. Floating Roof w/ Secondary Seal;		
Segment Description:		standing losses		
SCC:		40400179	SCC Units:	1000 Gallons Petroleum Liquid Transferred
Process/Fuel Description:		Petroleum and Solvent Evaporation; Petroleum Liquids Storage (non-Refinery); Bulk Terminals; Specify Liquid: Internal Floating Roof (Primary/Secondary Seal);		
Segment Description:		working losses		
Permit Condition				Observations
Throughput. The throughput shall not exceed 500,000,000 gallons per year of Petroleum Products, calculated on a twelve-month rolling average basis. [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE), PTE Calculations received May 17, 2004] {Permitting Note: The throughput limit serves to provide assurance that the the facility would maintain its classification as a synthetic minor under the Prevention of Significant Deterioration (PSD) program.} Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.] Seal Gap Records and Reports. For at least 5 years, the owner or operator shall keep records and furnish the following reports: (a) Records of each Seal Gap Measurement. Each record shall identify the storage vessel in which the measurement was performed and shall contain: (i) The date of measurement, (ii) The raw data obtained in the measurement, and (iii) Required calculations. (b) Non-compliance Report. After each seal gap measurement that detects gaps exceeding the limitations, submit a report to the Administrator within 30 days of the inspection. The report will identify the vessel and contain the information on (i) The date of measurement, (ii) The raw data obtained in the measurement, (iii) Required calculations, (iv) The date the vessel was emptied or the repairs made, and (v) The date of repair. [40 CFR 63.428 (d), 40 CFR 60.115b]				Records are kept for each tank. The seal gap reports were available and maintained.

AIRS ID	EU#	Emission Unit Description	EU Class	ARMS Status
0110069	44	External Floating Roof Tanks 219, 224	Regulated Emissions Unit	ACTIVE
Grouping		EU Compliance Status		Comments
		IN COMPLIANCE		
SCC:		40400140	SCC Units:	1000 Gallon-Years Liquid Storage Capacity
Process/Fuel Description:		Petroleum and Solvent Evaporation; Petroleum Liquids Storage (non-Refinery); Bulk Terminals; Specify Liquid: Standing Loss - Ext. Float Roof Tank w/ Secondy Seal;		
Segment Description:		Standing Losses		
SCC:		40400149	SCC Units:	1000 Gallons Petroleum Liquid Transferred
Process/Fuel Description:		Petroleum and Solvent Evaporation; Petroleum Liquids Storage (non-Refinery); Bulk Terminals; Specify Liquid: External Floating Roof (Primary/Secondary Seal);		
Segment Description:		Working losses		
Permit Condition				Observations

Throughput. The throughput shall not exceed 100,000,000 gallons per year of Petroleum Products, calculated on a twelve-month rolling average basis. [Rule 62-4.160(2), F.A.C. and Rule 62-210.200, F.A.C., Definitions - (PTE), PTE calculations received May 17, 2004] {Permitting Note: The throughput limit serves to provide assurance that the the facility would maintain its classification as a synthetic minor under the Prevention of Significant Deterioration (PSD) program.} G.2. Hours of Operation. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year. [Rule 62-210.200(PTE), F.A.C.]	Records are kept for throughput and specific product on each tank.
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AIRS ID	EU#	Emission Unit Description	EU Class	ARMS Status
0110069	45	Marine Loading/Unloading (Berth 6) with VRU	Regulated Emissions Unit	ACTIVE

Grouping	EU Compliance Status	Comments
	IN COMPLIANCE	

SCC:	40400151	SCC Units:	1000 Gallons Petroleum Liquid Transferred
Process/Fuel Description:	Petroleum and Solvent Evaporation; Petroleum Liquids Storage (non-Refinery); Bulk Terminals; Valves, Flanges, and Pumps;		
Segment Description:	equipment fugitives		
SCC:	40600237	SCC Units:	1000 Gallons Gasoline Transferred
Process/Fuel Description:	Petroleum and Solvent Evaporation; Transportation and Marketing of Petroleum Products; Marine Vessels; Gasoline: Ocean Barges Loading - Uncleaned Tanks;		
Segment Description:			
SCC:	40600243	SCC Units:	1000 Gallons Crude Oil Transferred
Process/Fuel Description:	Petroleum and Solvent Evaporation; Transportation and Marketing of Petroleum Products; Marine Vessels; Crude Oil: Loading Tankers;		
Segment Description:			
SCC:	40600246	SCC Units:	1000 Gallons Distillate Oil Transferred
Process/Fuel Description:	Petroleum and Solvent Evaporation; Transportation and Marketing of Petroleum Products; Marine Vessels; Distillate Oil: Loading Tankers;		
Segment Description:			

Permit Condition	Observations
Throughput. The products throughputs shall be less than 420 million gallons (10 million barrels) per year of gasoline and less than 500 million gallons of distillate, calculated on a twelve-month rolling average basis. [Rule 62-4.160(2), F.A.C. and Rule 62-210.200 (245), F.A.C., Definitions - (PTE); Construction Permit No. 0110069-016-AC] {Permitting Note: (1) The applicant requested the throughput limit in order to be exempted from the Reasonably Available Control Technology (RACT) standards requirements of NESHAP 40 CFR 63 Subpart Y. (2) If TransMontaigne decides to ship load pure ethanol, TransMontaigne will then deduct the ethanol throughput from the permitted allowable gasoline throughput. }	The throughputs until May 2012 was 175,329,155 for distillate and 16,303,681 for gas and ethanol.

SECTION IV: OTHER COMMENTS/RECOMMENDATIONS/PERMIT EXPIRATION DATES FOR FACILITY 0110069
On June 27, 2012 Paul Shelton and Cynthia Fernandez, from AQD conducted a joint inspection at TransMontaigne North Everglades. On site were Casey Brouwer, Keith Brodie, Paul Siler, and Mark Cavallaro for TransMontaigne. The facility has remained in compliance with its air permit 0110069. A walk through to

verify all the regulated emissions was conducted which included, petroleum, storage tanks, hot oil heaters, boilers, yard loading racks, and marine loading racks operations. Records were available and maintained for each emission unit for the past five years. Observations were made for each emission unit. For fiscal calendar year 2012, the facility has remained in compliance with excellent recordkeeping and great housekeeping.

INSPECTOR(S):

Name	Office	Phone	Email Address	Inspector of Record
Cynthia V Fernandez	SEBR	954-519-1459	cfernandez@broward.org	Y

OVERALL COMPLIANCE STATUS FOR FACILITY 0110069 - IN COMPLIANCE

Printed *Tuesday, July 17, 2012*