



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
TIDEWATER REGIONAL OFFICE

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COMMONWEALTH OF VIRGINIA Department of Environmental Quality Tidewater Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

TransMontaigne Operating Company, L.P.
Chesapeake, Virginia
Permit No. TRO-60242

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, TransMontaigne Operating Company, L.P. has applied for a Title V Operating Permit for its Chesapeake, Virginia facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Air Permit Writer:

Lindsey M. Evans
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Date: April 4, 2014

Regional Air Permits
Manager:

Troy D. Breathwaite

Date: April 7, 2014

Regional Director:

Maria R. Nold

Date: April 7, 2014

FACILITY INFORMATION

Permittee

TransMontaigne Operating Company, L.P.
PO Box 5660
Denver, Colorado 80217-5660

Facility

TransMontaigne Operating Company, L.P. - Norfolk Terminal
7600 Halifax Lane
Chesapeake, Virginia 23324

County-Plant Identification Number: 51-550-00035

SOURCE DESCRIPTION

NAICS Code: 424710 - Petroleum Bulk Stations and Terminals

The source is a bulk petroleum liquids storage and distribution facility. The facility consists of thirty-eight (38) storage tanks, two (2) truck loading racks, and one (1) marine vessel loading operation. The source also operates two (2) distillate oil-fired boilers/hot oil heaters, two (2) diesel emergency generators, and one (1) diesel emergency fire pump. Truck loading rack LR-1 and marine vessel loading rack BL-1 are each equipped with a Vapor Combustion Unit (VCU-1 and MVCU-1) for the control of VOC/HAP emissions.

Tanks 1, 2, 3, 4, 11, 13, 101, 102, 103, 104, 105, and 109 and truck loading rack LR-1 are subject to the requirements of 40 CFR 63, Subpart BBBBBB (Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk, Plants, and Pipeline Facilities) when in gasoline service. Tanks 4 and 109 are also subject to the requirements of 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23 1984) when in gasoline service. In addition, truck loading rack LR-1 is subject to the requirements of 40 CFR 60, Subpart XX (Standards of Performance for Bulk Gasoline Terminals) when in gasoline service. As an area source of HAP emissions, the source is exempt from the requirements of 40 CFR 63, Subpart R (National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) under §63.420(a)(2) but must maintain records to demonstrate its continued exempt status.

Tanks 1, 2, 3, 4, 11, 13, 101, 102, 103, 104, 105, and 109 and truck loading rack LR-1 are subject to the requirements of Virginia Rule 4-37 (9 VAC 5-40-5200 et al: Emission Standards For Petroleum Liquid Storage and Transfer Operations) when in gasoline service.

The boilers/hot oil heaters are subject to the requirements of 40 CFR 63, Subpart JJJJJJ (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources). The emergency generators are subject to the requirements of 40 CFR 63, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) and 40 CFR 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). As new stationary RICE located at an area source, the emergency generators must meet the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII. No further requirements apply for these engines under 40 CFR 63, Subpart ZZZZ.

The facility is a Title V major source of VOC but a synthetic minor (area) source of HAP. This source is located in an attainment area for all pollutants, and is a PSD minor source. The facility is currently permitted under a State Major NSR Permit issued on April 22, 2010, and modified on August 27, 2012, and October 17, 2013.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. The source was found to be out of compliance during a Full Compliance Evaluation conducted on August 7, 2012. Based on the evaluation and follow-up information, it was determined that the source exceeded its annual throughput limit for denatured ethanol loading. A Notice of Violation was issued on November 15, 2012. The source entered into an Order by Consent, which included a civil charge, on April 4, 2013. Payment of the civil charge was received on May 7, 2013, and the enforcement case was closed on May 15, 2013.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Storage Tanks							
Tank 1	N/A	Storage tank (constructed 1946) MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	2,037,504 gallons	External floating roof with mechanical shoe primary seal and rim mounted secondary seal	---	VOC, HAP	October 17, 2013
Tank 2	N/A	Storage tank (constructed 1946) MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	2,820,090 gallons	External floating roof with mechanical shoe primary seal and rim mounted secondary seal	---	VOC, HAP	October 17, 2013
Tank 3	N/A	Storage tank (constructed 1946) MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	2,820,090 gallons	External floating roof with mechanical shoe primary seal and rim mounted secondary seal	---	VOC, HAP	October 17, 2013

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Tank 4	N/A	Storage tank (constructed 1946) After Modification: NSPS, Subpart Kb MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	3,412,290 gallons	After modification: Internal floating roof with seal system that meets the requirements of NSPS Kb and MACT BBBBBB for the storage of gasoline or lower vapor pressure petroleum products (TO BE INSTALLED)	---	VOC, HAP	October 17, 2013
Tank 5	N/A	Storage tank (constructed 1946)	2,012,892 gallons	---	---	---	October 17, 2013
Tank 6	N/A	Storage tank (constructed 1949)	3,384,108 gallons	---	---	---	October 17, 2013
Tank 7	N/A	Storage tank (constructed 1949)	3,384,108 gallons	---	---	---	October 17, 2013
Tank 9	N/A	Storage tank (constructed 1953)	3,371,088 gallons	---	---	---	October 17, 2013
Tank 10	N/A	Storage tank (constructed 1957)	2,120,916 gallons	---	---	---	October 17, 2013

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Tank 11	N/A	Storage tank (constructed 1956, modified 2004) MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	3,971,604 gallons	Internal floating roof w/ mechanical shoe primary seal and rim mounted secondary seal	---	VOC, HAP	October 17, 2013
Tank 12	N/A	Storage tank (constructed 1957)	3,290,112 gallons	---	---	---	October 17, 2013
Tank 13	N/A	Storage tank (constructed 1956, modified 2004) MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	2,105,670 gallons	External floating roof with mechanical shoe primary seal and rim mounted secondary seal	---	VOC, HAP	October 17, 2013
Tank 14	N/A	Storage tank (constructed 1958)	3,290,112 gallons	---	---	---	October 17, 2013
Tank 23	N/A	Storage tank (constructed 1988)	2,058 gallons	---	---	---	October 17, 2013
Tank 24	N/A	Storage tank (constructed 1960)	6,006 gallons	---	---	---	October 17, 2013
Tank 25	N/A	Storage tank (constructed 1993)	1,008 gallons	---	---	---	October 17, 2013
Tank 26	N/A	Storage tank (constructed 1993)	1,932 gallons	---	---	---	October 17, 2013
Tank 27	N/A	Storage tank (constructed 1980)	10,038 gallons	---	---	---	October 17, 2013
Tank 28	N/A	Storage tank (constructed 2004)	10,332 gallons	---	---	---	October 17, 2013

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Tank 29	N/A	Storage tank (constructed 2004)	1,000 gallons	---	---	---	October 17, 2013
Tank 31	N/A	Storage tank (constructed 2004)	42 gallons	---	---	---	October 17, 2013
Tank 32	N/A	Storage tank (constructed 2011)	10,000 gallons	---	---	---	October 17, 2013
Tank 33	N/A	Storage tank (constructed 2011)	10,000 gallons	---	---	---	October 17, 2013
Tank 101	N/A	Storage tank (constructed 1952) MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	3,327,408 gallons	Internal floating roof w/ mechanical shoe primary seal and rim mounted secondary seal	---	VOC, HAP	October 17, 2013
Tank 102	N/A	Storage tank (constructed 1952) MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	3,356,178 gallons	Internal floating roof w/ mechanical shoe primary seal and rim mounted secondary seal	---	VOC, HAP	October 17, 2013
Tank 103	N/A	Storage tank (constructed 1955) MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	3,390,870 gallons	Internal floating roof w/ mechanical shoe primary seal and rim mounted secondary seal	---	VOC, HAP	October 17, 2013

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Tank 104	N/A	Storage tank (constructed 1954) MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	2,325,372 gallons	Internal floating roof w/ mechanical shoe primary seal and rim mounted secondary seal	---	VOC, HAP	October 17, 2013
Tank 105	N/A	Storage tank (constructed 1955) MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	2,316,006 gallons	Internal floating roof w/ mechanical shoe primary seal and rim mounted secondary seal	---	VOC, HAP	October 17, 2013
Tank 106	N/A	Storage tank (constructed 1992)	6,006 gallons	---	---	---	October 17, 2013
Tank 109	N/A	Storage tank (constructed 1996) NSPS, Subpart Kb MACT, Subpart BBBBBB Rule 4-37 (gasoline storage)	3,356,178 gallons	Internal floating roof w/ mechanical shoe primary seal and rim mounted secondary seal	---	VOC, HAP	October 17, 2013
Tank 110	N/A	Storage tank (constructed 1996)	7,980 gallons	---	---	---	October 17, 2013
Tank 111	N/A	Storage tank (constructed 1996)	8,064 gallons	---	---	---	October 17, 2013
Tank 112	N/A	Storage tank (constructed 1986)	2,898 gallons	---	---	---	October 17, 2013
Tank 113	N/A	Storage tank (constructed 1996)	336 gallons	---	---	---	October 17, 2013

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Tank 114	N/A	Storage tank (constructed <1995)	1,008 gallons	---	---	---	October 17, 2013
Tank 115	N/A	Storage tank (constructed 2004)	42 gallons	---	---	---	October 17, 2013
Tank 116	N/A	Storage tank (constructed 2004)	252 gallons	---	---	---	October 17, 2013
Tank 117	N/A	Storage tank (constructed 2011)	10,000 gallons	---	---	---	October 17, 2013
Loading Racks							
LR-1	VCU-1	Four-lane truck loading rack NSPS, Subpart XX (gasoline loading) MACT, Subpart BBBBBB Rule 4-37 (gasoline loading)	432,000 gallons/hr (gasoline/denatured ethanol) 144,000 gallons/hr (distillate oil and lower VP product)	Vapor Combustion Unit	VCU-1	---	October 17, 2013
LR-2	N/A	Two-lane truck loading rack for distillate oil and lower VP products	60,000 gallons/hr	---	---	---	October 17, 2013

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
BL-1	MVCU-1	Marine vessel loading operation	294,000 gallons/hr (gasoline/denatured ethanol) 420,000 gallons/hr (distillate oil & lower VP product)	Marine Vapor Combustion Unit (TO BE INSTALLED)	MVCU-1	---	October 17, 2013
Fuel Burning Equipment							
VCU-1	VCU-1	Vapor combustion unit for truck loading rack LR-1	Limit of 10 mg VOC/ liter of product loaded	---	---	---	October 17, 2013
MVCU-1	MVCU-1	Marine vapor combustion unit for the marine vessel loading operation BL-1 (TO BE INSTALLED)	Limit of 10 mg VOC/ liter of product loaded	---	---	---	October 17, 2013
B-1	B-1	Distillate oil-fired boiler (installed 1980) MACT, Subpart JJJJJ	6.2 MMBtu/hr	---	---	---	October 17, 2013
B-2	B-2	Distillate oil-fired boiler (installed 2005) MACT, Subpart JJJJJ	5.0 MMBtu/hr	---	---	---	October 17, 2013

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
B-3	B-3	Distillate oil-fired boiler (installed 2005) MACT, Subpart JJJJJ	5.0 MMBtu/hr	---	---	---	October 17, 2013
Internal Combustion Engines							
P-1	P-1	Werthington Model #15M185-4 emergency fire pump with Detroit diesel engine (installed ca. 1970)	315 HP	---	---	---	October 17, 2013
G-1	G-1	Caterpillar Model #C15 diesel emergency generator (manufactured 5/10/07, installed August 2007) NSPS, Subpart IIII MACT, Subpart ZZZZ	500 kW (671 HP)	---	---	---	October 17, 2013

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
G-2	G-2	Caterpillar Model #D175-2 diesel emergency generator (manufactured 9/20/06, installed August 2007) NSPS, Subpart IIII MACT, Subpart ZZZZ	175 kW (235 HP)	---	---	---	October 17, 2013

EMISSIONS INVENTORY

A copy of the 2012 emissions report is attached. Emissions are summarized in the following tables.

2012 Actual Emissions

Emission Unit	2012 Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO ₂	PM ₁₀	NO _x
Total	67.451	9.322	0.032	0.012	2.560

2012 Facility Hazardous Air Pollutant Emissions

Pollutant	2012 Hazardous Air Pollutant Emission in Tons/Yr
Benzene	0.104
Toluene	0.286
Ethyl benzene	0.026
Xylene	0.104
Hexane	0.367
2,2,4-Trimethylpentane (Iso-Octane)	0.096

EMISSION UNIT APPLICABLE REQUIREMENTS – Product Storage and Loading

(Tanks 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13, 14, 23, 24, 25, 26, 27, 28, 29, 31, 32, 33, 101, 102, 103, 104, 105, 106, 109, 110, 111, 112, 113, 114, 115, 116, and 117, Truck Loading Racks LR-1 and LR-2, and Marine Vessel Loading Operation BL-1)

Limitations

The following limitations are derived from the New Source Review permit issued October 17, 2013:

Condition 1 (NSR Condition 3):	Storage Tank Emission Controls
Condition 2 (NSR Condition 4):	Truck Loading Rack Emission Controls
Condition 3 (NSR Condition 5):	Truck Loading Rack Emission Controls
Condition 4 (NSR Condition 6):	Marine Vessel Loading Emission Controls
Condition 5 (NSR Condition 7):	Marine Vessel Loading Emission Controls
Condition 6 (NSR Condition 9):	Product Storage
Condition 7 (NSR Condition 10):	Product Transfer (Loading Racks)
Condition 8 (NSR Condition 11):	Product Transfer (Marine Vessel Loading)
Condition 9 (NSR Condition 12):	Product Throughput
Condition 10 (NSR Condition 13):	Roof Landings
Condition 11 (NSR Condition 26):	VOC Emission Limits

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9 VAC 5-40-5200 et seq.	Existing Stationary Sources - Emission Standards for Petroleum Liquid Storage and Transfer Operations (Rule 4-37)
9 VAC 5-50-260	BACT Standard for New and Modified Stationary Sources
9 VAC 5-50-400	Environmental Protection Agency Standards of Performance for New Stationary Sources
9 VAC 5-50-410	Designated Standards of Performance

The following Codes of Federal Regulations have been determined to be applicable:

40 CFR 60, Subpart XX	Standards of Performance for Bulk Gasoline Terminals
40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984
40 CFR 63, Subpart BBBB	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

Notifications

The Initial Notification requirements from the NSR permit have been included in Condition 36. The State Major NSR permit dated April 22, 2010 permitted the source to modify Tank 4 with the addition of an internal floating roof and seal system which meets the requirements of 40 CFR 60, Subpart Kb and 40 CFR 63, Subpart BBBBBB to accommodate the storage of gasoline. The source received an extension on the 18-month construction/modification deadline outlined in the April 22, 2010 permit on October 21, 2011. An additional 18-month extension was granted on April 22, 2013.

The applicable notification requirements from MACT BBBBBB are included in Condition 37.

Testing and Monitoring

The initial performance testing requirements from the NSR permit have been included in Condition 38. The source is required to perform an initial performance test on the marine vapor combustion unit to determine compliance with the mg/l VOC emission limits in Condition 4.

An additional testing requirement has been included for both VCU's in Condition 39. This condition requires the source to conduct periodic performance testing (once per permit term) on the vapor combustion unit and the marine vapor combustion unit to demonstrate continuing compliance with the mg/l VOC emission limits in Conditions 2 and 4.

A reference to the applicable testing requirements from NSPS XX is included in Condition 40 for truck loading rack LR-1.

The applicable monitoring requirements from NSPS Kb are included in Condition 41 for Tanks 4 and 109.

The applicable testing and monitoring requirements from MACT BBBBBB are included in Conditions 42, 43, and 44 for Tanks 1-4, 11, 13, 101-105, and 109, and loading rack LR-1.

The applicable testing and monitoring requirements from Existing Source Rule 4-37 are included in Conditions 45, 46, and 47 for Tanks 1-4, 11, 13, 101-105, and 109, and loading rack LR-1.

Compliance Assurance Monitoring (CAM) applies to truck loading rack LR-1 and marine vessel loading operation BL-1. These units are considered "other" Pollutant Specific Emission Units (PSEU) under CAM; therefore, the permittee will be required to submit CAM plans for these units with the Title V permit renewal application.

Recordkeeping and Reporting

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- (a) Documentation files for each truck loaded at the source, as required by Condition 3 of the permit;
- (b) Documentation files for each marine vessel loaded at the source, as required by Condition 5 of the permit;
- (c) Type of volatile organic liquid or petroleum product stored in each tank, and the period of storage;
- (d) For each product stored and loaded at the facility, the vapor pressure, Reid Vapor Pressure, or vapor pressure based upon similar product composition shall be provided to the VADEQ upon request. If vapor pressure cannot be determined based upon similar product composition, samples will be taken and provided to the VADEQ upon request;
- (e) Annual throughputs of each product (in gallons) through the storage tanks, loading racks, and marine vessel loading operation to demonstrate compliance with Condition 9, calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months; and
- (f) Records of the roof landings for all floating roof tanks storing gasoline or denatured ethanol, indicating the number of roof landings for each tank, or, alternatively, emissions calculations indicating the emissions from each roof landing event, calculated monthly as the sum of each consecutive 12-month period. Compliance with the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months.

The applicable recordkeeping and reporting requirements from NSPS XX are included in Condition 49 for truck loading rack LR-1.

The applicable recordkeeping and reporting requirements from NSPS Kb are included in Conditions 50 and 51 for Tanks 4 and 109.

The applicable recordkeeping and reporting requirements from MACT BBBB are included in Conditions 52 and 53 for Tanks 1-4, 11, 13, 101-105, and 109, and loading rack LR-1.

The applicable recordkeeping requirements from Existing Source Rule 4-37 are included in Condition 54, 55, and 56 for Tanks 1-4, 11, 13, 101-105, and 109, and loading rack LR-1.

EMISSION UNIT APPLICABLE REQUIREMENTS – Fuel Burning Equipment

(Vapor Combustion Units VCU-1 and MVCU-1 and Boilers B-1, B-2, and B-3)

Limitations

The following limitations are derived from the New Source Review permit issued October 17, 2013:

Condition 57 (NSR Condition 14):	Fuel
Condition 58 (NSR Condition 15):	Fuel
Condition 59 (NSR Condition 19):	Fuel
Condition 60 (NSR Condition 21):	Fuel Certification
Condition 61 (NSR Condition 27):	Products of Combustion Emission Limits (Vapor Combustion Unit(s))
Condition 62 (NSR Condition 30):	Visible Emission Limit (Vapor Combustion Units)

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9 VAC 5-50-260	BACT Standard for New and Modified Stationary Sources
9 VAC 5-50-80	Standard for Visible Emissions for New and Modified Stationary Sources

The following Code of Federal Regulations has been determined to be applicable:

40 CFR 63, Subpart JJJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
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Monitoring

The source is required to perform weekly visible emissions observations on each vapor combustion unit to ensure proper operation of the VCU. Any opacity from the units would indicate a malfunction; therefore, the source is required to shut down the vapor combustion unit(s) and the loading operation(s) associated with the vapor combustion unit(s) and perform corrective action if any visible emissions are observed. If repairs are required due to the presence of visible emissions, the source is required to conduct a Method 9 visible emissions evaluation after restarting the VCU to determine compliance with the 5% opacity limit.

The source is also required to perform a visible emissions observation on each boiler stack once per permit term. If visible emissions are observed, the source is required to perform corrective action to correct the cause of the visible emissions. If corrective action fails to eliminate the visible emissions, the source is required to perform a Method 9 visible emissions evaluation to determine compliance with the 20/30% new source opacity standard. The frequency of monitoring should be adequate for these units. The units are very small distillate oil-fired hot oil heaters and, as such, are not expected to produce visible emissions greater than the 20/30% new source opacity standard.

The applicable compliance and monitoring requirements from MACT JJJJJJ are included in Conditions 69, 70, and 71 for boilers B-1, B-2, and B-3.

Notifications, Recordkeeping, and Reporting

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- (a) All fuel supplier certifications for the distillate oil received for the boilers (Ref. Nos. B-1, B-2, and B-3), as required by Condition 60;
- (b) Records of all visible emissions observations and any corrective action taken for the vapor combustion unit (Ref. No. VCU-1) and the marine vapor combustion unit (Ref. No. MVCU-1), as required by Condition 67; and
- (c) Records of all visible emissions observations and/or Visible Emissions Evaluations (VEE) and any corrective action taken for each boiler (Ref. Nos. B-1, B-2, and B-3), as required by Condition 68.

The applicable notification, recordkeeping, and reporting requirements from MACT JJJJJJ are included in Condition 73 for boilers B-1, B-2, and B-3.

Testing

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

EMISSION UNIT APPLICABLE REQUIREMENTS – Internal Combustion Engines

(Emergency Generators G-1 and G-2 and Emergency Fire Pump P-1)

Limitations

The following limitations are derived from the New Source Review permit issued October 17, 2013:

Condition 74 (NSR Condition 16):	Fuel
Condition 75 (NSR Condition 17):	Operating Hours and Limitations
Condition 76 (NSR Condition 18):	Operating Hours and Limitations
Condition 77 (NSR Condition 20):	Fuel
Condition 78 (NSR Condition 21):	Fuel Certification

The following Virginia Administrative Code has specific emission requirements that have been determined to be applicable:

9 VAC 5-50-80	Standard for Visible Emissions for New and Modified Stationary Sources
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The following Codes of Federal Regulations have been determined to be applicable:

40 CFR 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Testing and Monitoring

The source is required to perform a visible emissions observation on the stack of each emergency generator and the emergency fire pump once per permit term. If visible emissions are observed, the source is required to perform corrective action to correct the cause of the visible emissions. If corrective action fails to eliminate the visible emissions, the source is required to perform a Method 9 visible emissions evaluation to determine compliance with the 20/30% new source opacity standard. The frequency of monitoring should be adequate for these units. The units are small diesel-fired emergency engines and, as such, are not expected to produce visible emissions greater than the 20/30% new source opacity standard.

The applicable testing requirements from NSPS IIII are included in Condition 85 for Emergency Generator G-2.

Notifications, Reporting, and Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- (a) Annual hours of operation of each emergency generator (Ref. Nos. G-1 and G-2), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;
- (b) Annual hours of operation of the emergency fire pump (Ref. No. P-1), calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months;
- (c) All fuel supplier certifications for the distillate oil received for the emergency generators (Ref. Nos. G-1 and G-2) and the emergency fire pump (Ref. No. P-1), as required by Condition 78; and
- (d) Records of all visible emissions observations and/or Visible Emissions Evaluations (VEE) for each emergency generator (Ref. Nos. G-1 and G-2) and the emergency fire pump (Ref. No. P-1) and any corrective action taken, as required by Condition 84.

The applicable notification, recordkeeping, and reporting requirements from NSPS IIII are included in Condition 87 for emergency generators G-1 and G-2.

EMISSION UNIT APPLICABLE REQUIREMENTS – Facility Wide

Limitations

The following limitations are derived from the New Source Review permit issued October 17, 2013:

Condition 88 (NSR Condition 6):	VOC Work Practice Standards
Condition 89 (NSR Condition 28):	Facility Wide Criteria Pollutant Emission Limits
Condition 90 (NSR Condition 29):	Facility Wide HAP Emission Limits

The following Virginia Administrative Codes have specific emission requirements that have been determined to be applicable:

9 VAC 5-50-260	BACT Standard for New and Modified Stationary Sources
9 VAC 5-50-20 F	Compliance for New and Modified Stationary Sources
9 VAC 5-60-340	Emission Standards for Toxic Pollutants from New and Modified Sources – Submittal of Information

Monitoring

Specific monitoring requirements are included in permit Sections III (Product Storage and Loading), IV (Fuel Burning Equipment), and V (Internal Combustion Engines).

Recordkeeping and Reporting

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

- (a) Emissions calculations demonstrating compliance with the emission limits in Condition 90. Emissions shall be calculated monthly as the sum of each consecutive 12-month period. Compliance for the consecutive 12-month period shall be demonstrated monthly by adding the total for the most recently completed calendar month to the individual monthly totals for the preceding 11 months; and
- (b) Maintenance records directly related to maintaining equipment for the purpose of air quality compliance for each item of all permitted equipment, including the vapor combustion units (Ref. No. VCU-1 and MVCU-1).

Testing

The facility-wide testing requirements from the NSR permit have been included in Condition 92. The permit requires that the source be constructed so as to allow for emissions testing upon reasonable notice at any time, using appropriate methods.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

96-101. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the "Department of Environmental Quality Agency Policy Statement No. 2-09".

This general condition cite(s) the Article(s) that follow(s):

Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9 VAC 5-80-80. Application
9 VAC 5-80-140. Permit Shield
9 VAC 5-80-150. Action on Permit Applications

107. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

This general condition cites the sections that follow:

9 VAC 5-40-41 Emissions Monitoring Procedures for Existing Sources
9 VAC 5-40-50 Notification, Records and Reporting
9 VAC 5-50-50 Notification, Records and Reporting

This general condition contains a citation from the Code of Federal Regulations as follows:

40 CFR 60.13 (h) Monitoring Requirements

111. Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50	Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190	Changes to Permits
9 VAC 5-80-260	Enforcement
9 VAC 5-80-1100	Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1605	Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9 VAC 5-80-2000	Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas

125-128. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Conditions 125-128 and General Condition 107. For further explanation see the comments on general condition 107.

These general conditions cite the sections that follow:

9 VAC 5-20-180	Facility and Control Equipment Maintenance or Malfunction
9 VAC 5-80-110	Permit Content

132. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to demolition and renovation
40 CFR 61.148, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to insulating materials
40 CFR 61.150, NESHAP Subpart M	National Emissions Standards for Asbestos as it applies to waste disposal

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70	Designated Emissions Standards
9 VAC 5-80-110	Permit Content

STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State:

9 VAC 5 Chapter 50, Part II, Article 2: Standards of Performance for Odorous Emissions

9 VAC 5 Chapter 60, Part II, Article 5: Emission Standards for Toxic Pollutants from New and Modified Sources

INAPPLICABLE REQUIREMENTS

Citation	Title of Citation	Description of Applicability
40 CFR 60, Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978	None of the petroleum liquid storage tanks at this source meet the installation date and/or size criteria for applicability to this subpart.
40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984	None of the petroleum liquid storage tanks at this source meet the installation date and/or size criteria for applicability to this subpart.
40 CFR 63, Subpart R	National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)	The source is exempt from the requirements of this subpart but must demonstrate continued exemption. Potential emissions are below 10 TPY for a single HAP and below 25 TPY for all HAPs combined.
40 CFR 68	Chemical Accident Prevention Provisions	Petroleum liquids (gasoline, diesel fuel, jet fuel, etc.) are not subject to this rule.

After July 1, 2011, sources that emit over 100,000 tpy CO₂e and have a CO₂e mass equivalent to 100 tpy are required to have a Title V permit even if they are not Title V major for any criteria pollutant or HAP. Additionally, any source that increases their CO₂e emissions more than 75,000 tpy as a result of a modification is required to address their CO₂e emissions as part of the Title V permit.

TransMontaigne is not currently subject to GHG regulations. There are no applicable GHG permitting requirements for this source.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
None Identified				

¹The citation criteria for insignificant activities are as follows:

9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application

9 VAC 5-80-720 B - Insignificant due to emission levels

9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in The Virginian-Pilot newspaper from **Thursday, February 20, 2014** to **Monday, March 24, 2014**.