



NRO-106-12

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

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May 18, 2012

**COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Northern Regional Office**

STATEMENT OF LEGAL AND FACTUAL BASIS

TransMontaigne Operating Company, LP
Fairfax, Virginia
Permit No. NRO70306 – Registration Number 70306

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 9VAC5 Chapter 80, TransMontaigne Operating Company, LP has applied for a Title V Operating Permit Renewal for its Fairfax Terminal. The Department has reviewed the application and has prepared a draft Renewal Title V Operating Permit.

Engineer/Permit Contact: _____ Date:
Gary Beeson
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Air Permit Manager: _____ Date:
Terry H. Darton

Regional Director: _____ Date:
Thomas A. Faha

FACILITY INFORMATION

Permittee

TransMontaigne Operating Company, L.P.
P. O. Box 5660
Denver, CO 80217-5660

Facility

Fairfax Terminal
3790 Pickett Road
Fairfax, Virginia 22031
County-Plant Identification Number: 51 – 059 – 0082

SOURCE DESCRIPTION

NAICS Code: 424710 – Petroleum Bulk Stations and Terminals

The facility is a petroleum liquids storage and distribution facility with a potential to operate 8760 hours per year. It is comprised of nine (9) vertical fixed roof tanks equipped with internal floating roofs with mechanical seals which may store gasoline or lower vapor pressure products and ethanol products, five (5) vertical fixed roof tanks for storing distillates, additives, or water, and three (3) tanks for storing additives, low sulfur diesel fuel, or Jet A fuel. The facility has one loading rack that may load gasoline or lower vapor pressure products, ethanol, or distillate products. It is comprised of five lanes with twenty-three loading arms which are connected to a vapor combustion unit (VCU). The facility is properly equipped to dispense gasoline or other organic liquids with vapor pressures greater than 1.5 pounds per square inch (psi). All five lanes of the loading rack are equipped with bottom filling supply lines.

The source is located in an ozone non-attainment area. The facility is not a prevention of significant deterioration (PSD) source. The facility was originally permitted under a minor source permit to construct and operate two 80,000 barrel (3,360,000 gal) with an internal floating roofs (TK-111 and TK-112). This permit was issued on September 5, 1974. These two tanks are subject to 40 CFR 60, Subpart K with all other units at the facility grandfathered at that time. The source is subject to 40 CFR 63, Subpart BBBBBB. The loading rack is subject to 40 CFR 60, Subpart XX. Prior appropriate notifications have been made to establish this facility as exempt from 40 CFR 63, Subpart R.

The facility is a Title V major source of Volatile Organic Compounds (VOC). This source is located in a non-attainment area for ozone. The facility was originally permitted for two 80,000 barrel (3,360,000 gallons) tanks with internal floating roofs (IFR). All other units at the facility were originally grandfathered tanks and not subject to any NSPS requirements. However, the facility is now currently permitted under a Minor NSR Permit issued on July 11, 2003, and amended on January 12, 2004, April 20, 2004, November 18, 2004, May 22, 2008, February 4, 2011, and November 29, 2011.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was completed on October 21, 2010. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

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
TK-101	N/A	Fixed Roof Petroleum liquid storage tank.	2,438,184 gal	Internal floating roof w/primary and secondary seals.	-----	Volatile organic Compound (VOC)	November 29, 2011
TK-102	N/A	Fixed Roof Petroleum liquid storage tank.	2,438,184 gal	Internal floating roof w/primary and secondary seals.	-----	VOC	November 29, 2011
TK-104	N/A	Fixed Roof Petroleum liquid storage tank.	2,438,184 gal	Internal floating roof w/primary and secondary seals.	-----	VOC	November 29, 2011
TK-105	N/A	Fixed Roof Petroleum liquid storage tank.	2,438,184 gal	Internal floating roof w/primary and secondary seals.	-----	VOC	November 29, 2011
TK-106	N/A	Fixed Roof Petroleum liquid storage tank.	211,092 gal	Internal floating roof w/primary and secondary seals.	-----	VOC	November 29, 2011
TK-109	N/A	Fixed Roof Petroleum liquid storage tank.	602,196 gal	Internal floating roof w/primary and secondary seals.	-----	VOC	November 29, 2011
TK-110	N/A	Fixed Roof Petroleum liquid storage tank.	846,006 gal	Internal floating roof w/primary and secondary seals.	-----	VOC	November 29, 2011
TK-111	N/A	Fixed Roof Petroleum liquid storage tank.	3,384,108 gal	Internal floating roof w/primary and secondary seals.	-----	VOC	November 29, 2011
TK-112	N/A	Fixed Roof Petroleum liquid storage tank.	3,384,108 gal	Internal floating roof w/primary and secondary seals.	-----	VOC	November 29, 2011
LR-1	VCU	Truck Loading Rack	120,000 gal/hr	Vapor collection system and a vapor combustion unit	VCU	VOC	November 29, 2011

EMISSIONS INVENTORY

A copy of the 2011 annual emission update is attached. Emissions are summarized in the following tables.

2011 Actual Emissions

Emission Unit	2011 Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO ₂	PM ₁₀	NO ₂
TK-101, TK-102, TK-105, TK-106, TK-109, TK-111, and TK-112 – Combined Gasoline/Ethanol	15.670	—	—	—	—
TK-101, TK-102, TK-105, TK-106, TK-109, TK-111, and TK-112 – IFR Landing Losses	4.220	—	—	—	—
Loading Rack – Reformulated Gasoline	8.495	—	—	—	—
Fugitive Emissions (Equipment Leaks)	11.686	—	—	—	—
VCU Stack	1.650	4.13	—	—	1.65
Total	42.721	4.13	—	—	1.65

Note: Emission units with less than 0.5 Ton/Year are not included in this table.

2011 Facility Hazardous Air Pollutant Emissions

Pollutant	2011 Hazardous Air Pollutant Emission in Tons/Yr
2,2,4-Trimethylpentane	0.295
Benzene	0.548
Ethyl benzene	0.020
ISPBZ	0.005
n-Hexane	0.768
Toluene	0.611
Xylene(s)	0.257
TOTAL	2.504

EMISSION UNIT APPLICABLE REQUIREMENTS - Tanks TK-101, TK-102, TK-104, TK-105, TK-106, TK-109, TK-110, Tk-111, TK-112, and LR-1

The TransMontaigne Fairfax Terminal is a grandfathered facility subject to the Virginia existing source regulation, 9VAC5 Chapter 40, Article 37, with the exception of two 3,360,000 gallon IFR tanks (TK-111 and TK-112) which are subject to 40 CFR 60, Subpart K. All other units at this source are subject to 40 CFR 63, Subpart BBBBBB. The loading rack is subject to 40 CFR 60, Subpart XX. Prior appropriate notifications have been made to establish this facility as exempt from 40 CFR 63, Subpart R.

The original Title V permit was dated September 29, 2000 and amended on July 18, 2003 to allow the redistribution of fuels through the loading rack with the total product through the loading rack remaining the same.

The Green House Gas requirements are not available at this time. when information become available this permit will be reevaluated.

Limitations

Emission Controls – Tanks TK-101, TK-102, TK-104, TK-105, TK-106, TK-109, TK-110, Tk-111, and TK-112

Emissions to the atmosphere from the fixed roof gasoline tanks shall be controlled by internal floating roofs (or covers) resting on the surface of the liquid contents and equipped with closure seals to close the space between the floating roof edge and the tank shell. Tanks storing volatile organic compounds (VOC) shall achieve a minimum of ninety percent (90%) reduction by weight in emissions. The storage of petroleum products with a true vapor pressure greater than or equal to 1.5 pounds per square inch absolute (psia) shall

achieve this reduction by installing an internal floating roof equipped with closure seals.

All gasoline storage tanks located at this facility conform to the above requirements. These requirements are specified in 9VAC5-40-5230.A.1.a and 9VAC5-40-5230.B.4. Tanks so equipped may store either gasoline and lower vapor products or distillates. A gasoline storage tank that sometimes stores distillates is referred to as a "swing" tank. When storing distillate fuel, the rigorous requirements of gasoline storage would be minimized. For example, the requirement to minimize time the floating roof is standing on its legs would not be relevant to storage of distillate fuel. The annual and other inspections would, however, remain in force.

Fixed roof tanks storing petroleum liquids with a vapor pressure less than 1.5 psia under actual storage condition or, in the case of filling or processing, under actual filling conditions are exempt from Rule 4-37. (9VAC5-40-5200C)

A tank with a fixed roof in combination with an internal floating roof (IFR) must meet certain specifications that mitigate VOC emission loss from sampling, from access to product by ladder or through any openings (e.g. rim space vents, automatic bleeder vents), and from filling, emptying, or refilling of the tank

- 1. Volatile organic compound (VOC) emissions from the storage tanks shall be controlled by Internal Floating Roof (IFR) resting on the surface of the liquid contents and equipped with a closure seal or seals to close the space between the roof edge and the tank shell.*
- 2. All tank gauging and sampling devices should be vapor tight except when gauging or sampling is taking place.*
- 3. Tanks must be painted white, light pastel or light metallic. The coating must be in good condition.*
- 4. The gasoline storage tanks shall be provided with adequate access for inspection.*

Emission Controls – Truck Loading Rack (LR-1)

A vapor combustion unit (VCU) shall control VOC emissions to the atmosphere from the loading rack. The loading configuration shall direct all vapors and air from the tanker truck to the VCU. A reduction of 90% of the VOCs emitted to the atmosphere is satisfied by the use of the VCU. Maximum emissions to the atmosphere from the VCU shall be ten milligrams (10mg) of total organic compounds per liter (mg/L) of gasoline loaded. The ten mg/L limit more than satisfies the ninety percent (90%) reductions and is a voluntary limit.

As a part of the permitting the VCU, the permittee agreed that lieu of installing and operating a VOC Continuous Emissions Monitoring System (CEMS), the permittee shall conduct a performance test on an annual basis (no greater than twelve months between successive performance tests) to measure VOC emissions at the VCU. This condition would alleviate the Title V condition requiring that the emissions be tested once each permit term.

The loading rack dispensing valves and fittings are vapor and liquid tight. There shall be no leakage. During the loading and unloading of tanker trucks there shall be no VOC concentrations detected greater than 100 of the lower explosive limit (LEL), measured as propane, at two and one-half (2.5) centimeters around the perimeter of a potential leak source as detected by a combustible gas detector.

Loading rack LR-1 is equipped to dispense either gasoline or distilled.

The facility limits are specified as "loading rack limits" because there are condition that may arise in which fuel would be received from a pipeline into a tank and returned directly to the pipeline with negligible emissions from the loading/unloading operation

1. *Volatile Organic Compounds (VOC) emissions from the truck loading rack (Ref. LR-1) shall be captured by the vapor collection system and controlled by the VCU.*
2. *The vapor collection system and the VCU shall be provided with adequate access for inspection and shall be in operation when the gasoline loading rack is operating.*

Operating Limits

1. *Fuel Throughput – The combined annual throughput of gasoline and lower vapor pressure products (ethanol, gasoline-ethanol blends, and other products with a vapor pressure greater than 1.5 psi) through the tank truck loading rack (Ref. LR-1) shall be limited to 1,000,000,000 gallons calculated monthly as the sum of each consecutive 12-month period. Compliance shall be demonstrated by recordkeeping in accordance with Condition 19 of the November 29, 2011 NSR permit.*
2. *Fuel Throughput – The annual throughput of distillate through the tank truck loading rack (Ref. LR-1) shall be limited to 1,150,000,000 gallons/tear calculated monthly as the sum of each consecutive 12-month period. Compliance shall be demonstrated by recordkeeping in accordance with Condition 19 of the November 29, 2011 NSR permit.*

Tank Trucks/Account Trucks and Vapor Collection Systems

Rule 4-37 requires that tanker trucks must present a certification of vapor tightness before begin loaded, and be free of visible leaks. A record of this certification and an identification number are kept at the terminal. The terminal owner or operator has the responsibility to refuse to fill an uncertified, non vapor-tight or leaking tanker. The refusal is in the interest of safety. A tanker truck operator may by various means supply incorrect documentation about the vapor-tightness of this truck. Obviously, any visibly leaking tank will not be filled. The terminal owner or operator cross-checks each tank assigned identification number (when vapor tightness testing is performed). The tanker truck may be filled under these circumstances. When an uncertified tanker truck is discovered (or a tank certification has expired), the terminal owner or operator notifies the tanker truck owner that the non vapor-tight tanker truck will not be reloaded at the terminal until proper certification has been presented.

1. *No owner or other person shall use or permit the use of any tank truck or account truck that is loaded or unloaded at gasoline bulk loading facilities unless such truck is designed, maintained, and certified to be vapor tight. In addition, there shall be no avoidable visible liquid leaks.*
2. *Vapor-laden tank trucks or account trucks exclusively serving gasoline bulk loading facilities may be refilled only at the loading rack when the vapor collection system and VCU control device are in operation*
3. *Tank truck and account truck hatches shall be closed at all times during loading and unloading operations (periods during which there is liquid flow into or out of the truck) at gasoline bulk loading facilities.*

Monitoring/Recordkeeping

Tanks Annual Inspection – The tanks equipped with internal floating roofs, (TK-101, TK-102, TK-104, TK-105, TK-106, TK-109, TK-110, TK-111, and TK-112) shall be visually inspected annually as required at 9VAC5-40 Article 37. The inspections shall be made through available roof hatches and manholes located on the fixed roofs of the tanks and shall include, but not limited to the cover and seals. If holes or tears in the cover or seal material, or liquid are observed on the cover, the owner/operator shall empty and remove the tank from service within forty-five days and make repairs as necessary. If at a failure that is detected during the inspection cannot be repaired within forty-five days, or if the tank cannot be emptied within forty-five days in order to make repairs, a thirty day extension may be requested from the Regional Air Compliance Manager of the Department of Environmental Quality's (DEQ) Northern Regional Office (NRO), in writing.

Tanks Following Emptying – For tanks equipped with internal floating roofs, (TK-101, TK-102, TK-104, TK-105, TK-106, TK-109, TK-110, TK-111, and TK-112) following tank emptying or degassing an inspection shall be made of the internal floating roof, the primary seal, the secondary seal (if equipped), gaskets, slotted membranes, and sleeve seals (if any) of each tank each time it is emptied and degassed and taken out of service for maintenance, an emergency, or similar purpose as required at 9VAC5-40-37. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or seal fabric, or the gaskets no longer close off the liquid surface from the atmosphere, or the slotted membrane has more than 10% open area, the owner/operator shall repair the items as necessary so that none of the anomalies specified herein shall exist when the tank is refilled. These inspections are applicable to TK-101, TK-102, TK-104, TK-105, TK-106, TK-109, TK-110, TK-111, and TK-112. In no case shall these inspections occur at an interval greater than 10 years

Records of Throughput – Maintain records of the throughput quantities and types of petroleum liquids stored, the average monthly storage temperature and true vapor pressure of the liquid as stored, and the results of the inspections performed under the provisions of 9VAC5-40 Article 37.

Compliance Assurance Monitoring (CAM) – In lieu of installing and operating a VOC Continuous Emissions Monitoring System (CEMS), the permittee shall conduct a performance test on an annual basis (no greater than twelve months between successive performance tests) to measure VOC emissions at the VCU to demonstrate compliance with the emission limit of the VCU. The CAM shall be operated at all times in which the VCU is in operation, except for exempt activities as designated in the Title V permit Condition III.D.

CAM – The permittee shall monitor, operate, calibrate and maintain the temperature monitoring system or an ultraviolet sensing system to verify the presence of flame during the operation of the VCU as required in the Title V permit Conditions III.D.1 - 8. The CAM shall be operated following quality assurance requirements, maintenance, calibration as required by the manufacture and other obligations specified in 40 CFR 64.7 through 40 CFR 64.9. Records from the CAM shall be maintained to demonstrate proper operation of the VCU.

There is no monitoring for the visible emission requirement. Operation of the current lines will not result in visible emissions.

The permittee shall maintain records of all storage tanks emission data and operating parameters necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the Regional Air Compliance Manager of the DEQs NRO.

A record of the monthly throughput of gasoline or lower vapor pressure products and ethanol through the storage tanks shall be maintained.

The annual throughput of gasoline or lower vapor pressure products and ethanol through the storage tanks 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 monthly throughput of distillate fuel products through the storage tanks shall be maintained.

The annual throughput of distillate fuel products through the storage tanks 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 Internal Floating Roof Inspection records shall identify the storage tank on which the inspection was performed and shall contain the date the tank(s) was inspected, the observed condition of each component of the control equipment (floating roof, seals, and fittings), and the dates and nature of any repairs which were made.

Maintain records of the types of petroleum liquids stored, the average monthly storage temperature and true vapor pressure of the liquid as stored in the storage tanks, and the results of the inspections performed.

The permittee shall maintain records of all emission data and operating parameters of the loading rack necessary to demonstrate compliance with this permit.

The monthly throughput of gasoline or lower vapor pressure products and ethanol through the loading rack shall be maintained.

The annual throughput of gasoline or lower vapor pressure products and ethanol through the loading rack (LR-1) calculated monthly as the sum of each consecutive 12-month period.

A record of the chamber temperature or ultraviolet readings of the VCU as required in Condition III.D.1 of this permit shall be kept.

The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan (QIP) required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan (QIP), and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

Testing

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.

Streamlined Requirements

Condition 7 of the 11/29/2011 NSR permit is not included in the Title V permit because following the issuance of the NSR permit the facility modified the loading rack to operate at a rate which would allow the fuel throughput limits of the facility and therefore the

facility limitation due to the loading rack restrictions is no longer applicable.

Condition 19 G of the 11/29/2011 NSR permit is not included in the Title V permit since the VOC emissions are only a calculated emission using the throughput, requiring this on a 12 month rolling average of VOC emissions is burdensome and excessive when the throughputs indicate the emissions. The annual VOC emission summary is still required for the annual emission update.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9VAC5-80-110 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 (Section VII)

B. 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. 2-2003".

This general condition cites the Article that follows Article 1 (9VAC5-80-50 et seq.), Part II of 9VAC5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9VAC 5-80-80. Application

9VAC 5-80-140. Permit Shield

9VAC 5-80-150. Action on Permit Applications

D. Annual Compliance Certification

In 2010 EPA issued revised submittal requirements in that the annual certification to EPA shall only be submitted in electronic format to the email address, R3_APD_Permits@epa.gov

F. Failure/Malfunction Reporting

Section 9VAC5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9VAC5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9VAC5-

20-180 is from the general regulations. All affected facilities are subject to section 9VAC5-20-180 including Title V facilities. Section 9VAC5-80-250 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 9VAC5-20-180 and 9VAC5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

This general condition cites the sections that follow:

9VAC5-40-41. Emissions Monitoring Procedures for Existing Sources
9VAC5-40-50. Notification, Records and Reporting
9VAC5-50-50. 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.

J. Permit Modification

This general condition cites the sections that follow:

9VAC5-80-50. Applicability, Federal Operating Permit for Stationary Sources
9VAC5-80-190. Changes to Permits.
9VAC5-80-260. Enforcement.
9VAC5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9VAC5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
9VAC5-80-2000. Applicability, Permits for Major Stationary Sources and Major Modifications Locating in Nonattainment Areas]

U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9VAC5-80-250 and 9VAC5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation see the comments on general condition F.

[This general condition cites the sections that follow:

9VAC5-20-180. Facility and Control Equipment Maintenance or Malfunction
9VAC5-80-110. Permit Content]

Y. 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 follows:

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:

9VAC5-60-70. Designated Emissions Standards

9VAC5-80-110. Permit Content

INAPPLICABLE REQUIREMENTS

9VAC5-40-3410 through 3550 (Article 25) – Emission Standards for VOC Storage and Transfer Operations -- The provisions under Article 25 do not apply to facilities which are subject to the provisions of Article 37. (9VAC5-40-3410.C).

40 CFR 60, Subparts Ka and Kb Gasoline Storage Tanks – NSPS for storage vessels for petroleum liquids/volatile organic liquids -- All gasoline storage tanks with exception of TK-111 and TK-112 were constructed prior to June 11, 1973 and there not applicable to this regulation.

40 CFR 63, Subpart R – National Emission Standards for Gasoline Distribution – Stage I -- The source is exempt from the requirements of Subpart R, but must demonstrate continued exemption. Potential emissions are below 10 TPY for a single HAP and below 25 TPY for a combination of all HAPs. Additionally the $E_T = 0.86772$ which is less than the exemption number of 1.

40 CFR 68 – Accidental Release Prevention Requirements: Section 112(r) -- Petroleum Liquids (gasoline, diesel fuel, jet fuel, etc.) are not subject to this rule.

COMPLIANCE PLAN

TransMontaigne Operating Company, LP – Fairfax Terminal is currently in compliance with all applicable requirements. No compliance plan was included in the application or the permit.

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

9VAC5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9VAC5-80-720 B)	Rated Capacity (gal) 9VAC5-80-720 C)
—	Island for loading diesel trucks	9VAC5-40-5200 C	VOC	—
TK-103	Vertical fixed roof	9VAC5-40-5200 C	VOC	3,377,346
TK-107	Vertical fixed roof	9VAC5-40-5200 C	VOC	16,422
TK-108	Horizontal fixed roof	9VAC5-40-5200 C	VOC	3,528
TK-113	Horizontal fixed roof	9VAC5-40-5200 C	VOC	6,006
TK-114	Horizontal fixed roof	9VAC5-40-5200 C	VOC	924
TK-115	Horizontal fixed roof	9VAC5-40-5200 C	VOC	3,990
TK-116	Horizontal fixed roof	9VAC5-40-5200 C	VOC	2,016
TK-117	Horizontal fixed roof	9VAC5-40-5200 C		10,347

The citation criteria for insignificant activities are as follows:
 9VAC5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
 9VAC5-80-720 B - Insignificant due to emission levels
 9VAC5-80-720 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 Washington Examiner from March 23, 2012 to April 23, 2012.