

ENGINEERING EVALUATION

TransMontaigne Operating Company LP – Martinez Terminal
Plant 24089 | Application 31761
2801 Waterfront Road, Martinez, CA 94553

BACKGROUND

TransMontaigne Operating Company LP (“TransMontaigne” or “facility” hereafter) has applied for an Authority to Construct to modify the following sources:

- S-14 Domed External Floating Roof Tank (T-14) storing various organic liquids, Maximum Capacity: 21 million (MM) gallons, Maximum True Vapor Pressure (TVP): 7.10 pounds per square inch absolute (psia)**
- S-15 Domed External Floating Roof Tank (T-15) storing various organic liquids, Maximum Capacity: 21 MM gallons, Maximum TVP: 7.10 psia**
- S-16 Domed External Floating Roof Tank (T-16) storing various organic liquids, Maximum Capacity: 21 MM gallons, Maximum TVP: 7.10 psia**

TransMontaigne is seeking to convert three existing external floating roof tanks (S-14, S-15, and S-16) to store gasoline, or other lower vapor pressure products such as gasoline, California Reformulated Blendstock for Oxygenate Blending (CARBOB) gasoline blendstock, diesel fuel (British Petroleum (BP) Diesel™ and Phillips 66 Diesel™), jet fuel, crude oil, fuel oil, gas oil, high sulfur vacuum gas oil (VGO), and low sulfur VGO. Gasoline is presented in the emission calculations for this application as it has the most conservative properties. The three tanks will be fitted with domed roofs over the external floating roof tank configurations. S-14, S-15, and S-16 are currently subject to Permit Condition #7034. On October 30, 2023, TransMontaigne requested to add diesel fuel (BP Diesel™ and Phillips 66 Diesel™) and jet fuel to the list of throughput materials for tanks S-14, S-15, and S-16.

EMISSION CALCULATIONS

Criteria Pollutants

Precursor organic compound (POC) emissions from storage tanks S-14, S-15, and S-16 were estimated using the TankESP program. A summary of the baseline emissions provided by the facility for sources S-14, S-15, and S-16 are shown in Table 2 below. The POC emissions estimates from TankESP are summarized below in Table 3 and detailed in Attachment A.

Table 1. Operational Basis

Annual Throughput (gallons/year)	240,000,000
Maximum (max) Hourly Throughput (gallons/hour)	1,050,000
Max Daily Throughput (gallons/hour)	25,200,000
Reed Vapor Pressure (RVP), May – Oct (psia)	7.1
RVP, Nov – Apr (psia)	13.5

Table 2. Baseline Emissions

Pollutant	Year	S-14 Emissions (pound/year)	S-15 Emissions (pound/year)	S-16 Emissions (pound/year)
POC	2019	978	91	2,532
	2020	435	39	1,979
	2021	64	47	1,576
	3-year Annual Average	492	59	2,029

Table 3. Tank Standing and Working POC Emissions, Post-Project

Source	Hourly Emissions (pounds/hour)	Daily Emissions (pounds/day)	Annual Emissions (pounds/year)	Annual Emissions (tons/year)
S-14	1.24	29.80	2,622	1.311
S-15	1.24	29.80	2,622	1.311
S-16	1.24	29.80	2,622	1.311
Total	3.72	89.40	7,866	3.933
Baseline to Potential to Emit (PTE)			5,286	2.643

Fugitive Emissions

Fugitive emissions from component replacements are calculated using the California Air Pollution Control Officers Association (CAPCOA) Method 3 (ca. 1999) set of correlation equations as well as the Air District's Rule 8-18 for non-repairable equipment leaks. For this project, there will be 10 valves and 13 flanges replaced.

Valves

$$2.27\text{E-}06 * (100 \text{ parts per million by volume (ppmv)}) ^ 0.747 = 7.08\text{E-}05 \text{ kilograms/hour/component}$$

Flanges

$$4.53\text{E-}06 * (100\text{ppmv}) ^ 0.706 = 1.17\text{E-}04 \text{ kilograms/hour/component}$$

Table 4. Fugitive Emissions Basis

Component	Count	Emission Factor (kg/hour/comp)	Emissions (lb/hour)	Pegged Factor (kg/hour)	Pegged Leakers	Emissions (pound/hour)
Valves	10	7.08E-05	1.56E-03	0.064	1	1.41E-01
Flanges	13	1.17E-04	3.35E-03	0.095	0	0.00

Total Fugitive Emissions

$$\text{Hourly: } (1.56\text{E-}03 \text{ lb/hr}) + (3.35\text{E-}03 \text{ lb/hr}) + (1.41\text{E-}01 \text{ lb/hr}) = 1.46\text{E-}01 \text{ lb/hr}$$

$$\text{Daily: } (1.46\text{E-}01 \text{ lb/hr}) * (24 \text{ hr/day}) = 3.5 \text{ lb/day}$$

Annual:

$$\text{Valves: } (7.08\text{E-}05 \text{ kg/hr/valve}) * (9 \text{ valves}) * (2.204 \text{ lb/kg}) * (8760 \text{ hrs/yr}) = 12.28 \text{ lb/yr}$$

$$\text{Valve (1, as pegged leaker): } (0.064 \text{ kg/hr}) * (2.204 \text{ lb/kg}) * (1 \text{ valve}) * (24 \text{ hrs/day}) * (90 \text{ days max}) = 304.13 \text{ lb/yr}$$

$$\text{Valve (1, non-pegged leaker): } (7.08\text{E-}05 \text{ kg/hr/valve}) * (2.204 \text{ lb/kg}) * (1 \text{ valve}) * (6,660 \text{ hrs/yr}) = 1.04 \text{ lb/yr}$$

$$\text{Flanges: } (1.17\text{E-}04 \text{ kg/hr/flange}) * (2.204 \text{ lb/kg}) * (13 \text{ flanges}) * (8760\text{hrs/yr}) = 29.31 \text{ lb/yr}$$

$$\text{Total} = 346.75 \text{ lb/yr} = 0.173 \text{ tpy}$$

Toxic Air Contaminants (TACs)

TAC emissions are summarized in Table 5 below. TAC ratio percentages are referenced from the material safety data sheets provided by the facility.

Table 5. Toxic Air Contaminant Emissions

TAC	% Content	1 tank (lbs/yr)	3 tanks (lbs/yr)	Trigger (lbs/yr)	Yes/No	1 tank (lbs/hr)	3 tanks (lbs/hr)	Trigger (lbs/hr)	Yes/No
Benzene	5%	1.39E+02	4.16E+02	2.90E+00	YES	6.35E-02	1.91E-01	1.20E-02	YES
Ethylbenzene	5%	1.39E+02	4.16E+02	3.30E+01	YES	6.35E-02	1.91E-01		
n-Hexane	5%	1.39E+02	4.16E+02	2.70E+05	NO	6.35E-02	1.91E-01		
Toluene	35%	9.71E+02	2.91E+03	1.20E+04	NO	4.45E-01	1.33E+00	2.2	NO
Xylenes	15%	4.16E+02	1.25E+03	2.70E+04	NO	1.91E-01	5.72E-01	9.7	NO
Naphthalene	1%	2.78E+01	8.33E+01	3.30E-03	YES	1.27E-02	3.81E-02		

Note: Table 5 specifies a comprehensive list of TACs present in all permitted and proposed products (gasoline, CARBOB, diesel fuel, jet fuel, crude oil, fuel oil, gas oil, low sulfur VGO, and high sulfur VGO) at sources S-14, S-15 and S-16, instead of just the proposed gasoline product. The percentages represent the maximum amount present across all permitted and proposed products. Additionally, TransMontaigne initially proposed an annual throughput amount of 252 million gallons. A health risk assessment (HRA) was conducted based on TAC emissions from this throughput. Fugitive emissions were not considered in this HRA. Therefore, TransMontaigne has agreed to lower the proposed annual throughput to 240 million gallons to closely match the previous overall POC emissions with the additional fugitive emissions. On October 30, 2023, TransMontaigne requested to add diesel fuel (BP Diesel™ and Phillips 66 Diesel™) and jet fuel to the list of stored materials for tanks S-14, S-15, and S-16. TransMontaigne has provided material safety data sheets (MSDS) for these materials. The MSDS each show that the toxic contents are not expected to exceed levels presented by gasoline in the refined health risk assessment (HRA).

Plant Cumulative Increase

Table 6. Plant Cumulative Increase

Pollutant	Existing Emissions Post 4/5/1991 (tpy)	S-14 Emissions A31761 (tpy)	S-15 Emissions A31761 (tpy)	S-16 Emissions A31761 (tpy)	Fugitive Emissions A31761 (tpy)	Total Emissions Increase A31761 (tpy)	Cumulative Plant Increase (tpy)
NOx	0.030	0.000	0.000	0.000	0.000	0.000	0.030
POC	0.001	1.311	1.311	1.311	0.173	4.106	4.107
CO	0.006	0.000	0.000	0.000	0.000	0.000	0.006
PM ₁₀ /PM _{2.5}	0.001	0.000	0.000	0.000	0.000	0.000	0.001
SO ₂	0.000	0.000	0.000	0.000	0.000	0.000	0.000

STATEMENT OF COMPLIANCE

Regulation 2, Rule 1 – General Requirements

Rule 2-1-301 stipulates that facilities must obtain written authorization from the Bay Area Air Quality Management District (BAAQMD) prior to installing and operating new, modified, or altered emission units. TransMontaigne has submitted this application to request a modification for sources S-14, S-15, and S-16 and is, thus, in compliance with this regulation.

Section 2-1-234 defines a modification as any change (physical, method of operation, throughput or production, or similar) at an existing source that results in an emissions increase to PTE or actual emissions baseline. Annual POC emissions from S-14, S-15, and S-16 are expected to increase from change due to gasoline storage, therefore, the Air District considers this a modification.

California Environmental Quality Review (CEQA)

This application is considered categorically exempt from CEQA as per CEQA Guidelines Section 15301 (“No or Negligible Expansion of Existing Use”) because the project has no potential for causing a significant adverse environmental impact. In making the determination that this application is categorically exempt: 1) the Air District reviewed the CEQA-related information from the applicant (Regulation 2-1-426.1) indicating that there is no potential for a significant adverse environmental impact from the project; 2) a formal health risk assessment was approved by the Air District; and 3) the Air district determined there are no unusual circumstances, or that the cumulative impacts from successive projects of the same type in the same place do not result in significant adverse environmental impacts. Since this is a project at high public interest facility, TransMontaigne has submitted Appendix H “Environmental Information Form” in accordance with Regulation 2-1-312. Notice of Exemption (NOE) will be filed with the Contra Costa County Clerk’s Office.

Public Notification, Overburdened Community

Public notice is required pursuant to Regulation 2-1-412 since this facility is located within an Air Districted designated Overburdened Community (OBC) and this project required an HRA. The facility has paid the requisite OBC fees. Placeholder: A public notice was prepared on 2023, and distributed on 2023.

**Regulation 2, Rule 2 – New Source Review
Best Available Control Technology (BACT)**

BACT is required for new and modified sources pursuant to Sections 2-1-301 and 2-1-302 for any criteria pollutants that may potentially emit more than 10 pounds per day. S-14, S-15, S-16 are each expected to exceed 10 lbs/day for the maximum daily rate, therefore are subject to BACT. BACT for external floating roof tanks is shown in Table 7 below.

Table 7. BACT Determination

Source:	Storage Tank – External Floating Roof, Organic Liquids	Revision:	2
		Document #:	167.1.2
Class:	All	Date:	09/19/2011

Pollutant	BACT 1. Technologically Feasible / Cost Effective 2. Achieved in Practice	Typical Technology
POC	<p>1. Vapor recovery system w/ an overall system efficiency \geq 98%</p> <p>2. BAAQMD Approved roof w/ liquid mounted primary seal and zero gap secondary seal, all meeting design criteria of Reg. 8, Rule 5. Also, no ungasketed roof penetrations, no slotted pipe guide pole unless equipped with float and wiper seals, and no adjustable roof legs unless fitted w/ vapor seal boots or equivalent.</p> <p>Additionally, a dome is required for tanks that meet all of the following: 1) capacity greater than or equal to 19,815 gallons; 2) located at a facility with greater than 20 tpy VOC emissions since the year 2000; and 3) storing a material with a vapor pressure equal to or greater than 3 psia (except for crude oil tanks that are permitted to contain more than 97% by volume crude oil).</p>	<p>1. Thermal Incinerator; or Carbon Adsorber; or Refrigerated Condenser; or BAAQMD approved equivalent</p> <p>2. BAAQMD Approved Roof and Seal Design</p>
NPOC	<p>1. Vapor recovery system w/ an overall system efficiency \geq 98%</p> <p>2. Same as for POC above</p>	<p>1. Carbon Adsorber; or Refrigerated Condenser; or BAAQMD approved equivalent</p> <p>2. BAAQMD Approved Roof and Seal Design</p>

Table 8. Cost Effectiveness for POC Controls (BACT Policy & Implementation)

	Direct Cost		\$ 201,441.00	Estimated per EPA's Control Cost Spreadsheet
A	Total Capital Cost		\$ 167,970.00	Estimated per QAQPS Control Cost spreadsheet
B	Overhead	5% of A	\$ 8,398.50	Per Policy & Implementation Procedure
C	Property Tax	1% of A	\$ 1,679.70	Per Policy & Implementation Procedure
D	Insurance	1% of A	\$ 1,679.70	Per Policy & Implementation Procedure
E	General & Admin	2% of A	\$ 3,359.40	Per Policy & Implementation Procedure
F	Capital Recovery	13.6% of A	\$ 22,843.92	Per Policy & Implementation Procedure
	Indirect Cost	= A+B+C+D+E+F	\$ 37,961.22	Per Policy & Implementation Procedure
	Annualized Cost	Direct + Indirect	\$ 239,402.22	\$/year
	POC Emissions (A31761)		4.091	tons POC/year
	Cost Effectiveness		\$ 58,519.24	\$/ton POC
	Maximum Cost to Control		\$ 17,500.00	\$/ton POC Per Policy & Implementation Procedure

Direct cost was obtained from the Environmental Protection Agency's (EPA) Air Pollution Control Cost Manual spreadsheet. The total capital cost was obtained from a spreadsheet based on Chapter 4 of the EPA's Office of Air Quality Planning and Standards (OAQPS) Control Cost Manual (5th Edition). The remainder of the indirect costs are from the Air District's BACT Policy & Implementation Procedure. According to the cost-effective analysis in Table 8 above, BACT(1) level of control for this project is not cost effective since it exceeds the District's BACT threshold for maximum cost to control at \$17,500 per ton of POC emissions.

Regarding BACT(2), TransMontaigne is proposing S-14, S-15, and S-16 with external floating roofs meeting BACT-level controls (doming) as well as the design criteria of Regulation 8, Rule 5. Additionally, they will abide by the dome requirement due to the capacity of the tanks, vapor pressure of the materials stored, and facility VOC emissions.

Offsets

The facility's potential to emit for POC is above 35 tpy and therefore, is subject to offsets per Regulation 2-2-302. TransMontaigne will provide POC offsets at a ratio of 1.15:1 using the banking certificate # 1831 in the amount of 4.722 tpy.

Prevention of Significant Deterioration (PSD)

The operation of S-14, S-15, and S-16 does not trigger a PSD review.

Regulation 2, Rule 5 – New Source Review of Toxic Air Contaminants

New or modified sources with TAC emissions exceeding trigger levels specified in Table 2-5-1 require an HRA pursuant to Sections 2-1-301 and 2-1-302. Table 4 above shows the resultant TAC emissions from S-14, S-15, and S-16 storage tanks. Table 9 shows the results summary of the refined HRA. This project passes the requirements of Regulation 2-5. It should be noted that the HRA conducted for this project assumed a naphthalene concentration of 1%. The new fuels requested on October 30, 2023 each have a naphthalene concentration of less than 1% and as such, the project still meets the risk limits.

Table 9. HRA Project Risk Summary

Receptor	NAD 83 UTM Coordinates (meters)		Cancer Risk (in a million)	Chronic Hazard Index	Acute Hazard Index
Resident	575,620	4,211,492	0.18	0.00066	NA
Worker	579,201	4,209,289	0.10	0.0046	NA
1-hr PMI	577,782	4,208,100	NA	NA	0.78

Regulation 8, Rule 5 – Storage of Organic Liquids

This project is proposing storage of various types of organic liquids not to exceed 7.1 TVP in domed external floating roof tanks, as required by Regulation 8-5-301 (storage tank control). Storage Tanks S-14, S-15, and S-16 must follow floating roof tank fitting requirements outlined in Regulation 8-5-320, have properly fitted primary seals that meet requirements of Regulation 8-5-321, and equip the tanks with secondary seals that meet the requirements of Regulation 8-5-322. The facility must not open interior vapor space of the tanks S-14, S-15, and S-16 to the atmosphere through hatch or manway, except to connect or disconnect degassing equipment to conduct tank contents or emissions sampling (Section 8-5-328, tank degassing requirements). Section 8-5-331 requires tank cleaning agents to meet outlined requirements unless all organic vapors and gases emitted during tank cleaning are collected and processed by an abatement device with an abatement efficiency of at least 90% by weight. The facility is expected to comply with all applicable requirements of Regulation 8-5.

Regulation 8, Rule 18 – Equipment Leaks

TransMontaigne is expected to continue to ensure that the replaced valves (Regulation 8-18-302) and connections (Regulation 8-18-304) for storage tanks S-14, S-15, and S-16 do not leak more than 100 ppmv of total organic compounds. The aforementioned sections outline requirements when exceeding these limits. The Air District estimates 0.15% of valves and connections as non-repairable equipment. A conservative estimate of 1 pegged valve was assumed in this application. Leaks from this one valve will be limited to 10,000 ppm (Regulation 8-18-306). The fugitive emissions of total organic compounds shall not exceed 5 pounds per day expect during the repair periods.

NESHAP 40 CFR Subpart BBBB – Gasoline Distribution Bulk Terminals

TransMontaigne is expected to comply with 40 CFR 63 Subpart BBBB by using roof seals and roof fittings that meet the design criteria of District Regulation 8-5.

New Source Performance Standards (NSPS) 40 CFR Part 60, Subpart Kb

NSPS 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*, applies to storage vessels with a capacity greater than or equal to 75 cubic meters (19,813 gallons) that are used to store volatile organic liquids for which construction or modification commenced after July 23, 1984. As S-14, S-15, and S-16 store volatile organic liquids and have a capacity greater than 75 cubic meters, NSPS Subpart Kb applies to these sources. 40 CFR, Part 60.112b(a) requires each storage vessel either with a design capacity greater than or equal to 151 m³ containing a volatile organic liquid that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa (0.75 psia) but less than 76.6 kPa (11.11 psia) to be equipped with an internal or an external floating roof. Part 60.112b(a)(2) further outlines the requirements for external floating roof tanks. TransMontaigne has specified that the true vapor pressure of the products stored in S-14, S-15, and S-16 will be in the range of 3.49 psia to 7.10 psia during all times of operation. S-14, S-15, and S-16 will use roof seals and roof fittings that meet the design criteria of District Regulation 8-5. Therefore, S-14, S-15, and S-16 will comply with NSPS (40 CFR 60, Subpart Kb).

PERMIT CONDITIONS

S-14, S-15, and S-16 will be subject to the following permit condition set:

COND# # -----

Applies to Storage Tanks S-14, S-15, and S-16

1. The owner/operator of S-14, S-15, and/or S-16 shall not exceed 240 million gallons of any combination of gasoline, CARBOB gasoline blendstock, diesel fuel (BP Diesel™ and Phillips 66 Diesel™), jet fuel, crude oil, fuel oil, gas oil, vacuum gas oil (VGO) high sulfur, and VGO low sulfur in each of S-14, S-15, and/or S-16 during any consecutive 12-month period.

(Basis: Cumulative Increase)

2. The owner/operator of S-14, S-15, and/or S-16 shall not exceed 25.2 million gallons of any combination of gasoline, CARBOB gasoline blendstock, diesel fuel (BP Diesel™ and Phillips 66 Diesel™), jet fuel, crude oil, fuel oil, gas oil, vacuum gas oil (VGO) high sulfur, and VGO low sulfur in each of S-14, S-15, and S-16 during any consecutive 24-hour period.

(Basis: Cumulative Increase)

3. The owner/operator of S-14, S-15, and/or S-16 shall not store any materials that exceed a true vapor pressure (TVP) of 7.10 psia in each of the S-14, S-15, and/or S-16 tanks.

(Basis: Cumulative Increase)

4. The owner/operator of S-14, S-15, and/or S-16 may store alternate liquid(s) other than the materials specified in Part 1 and Part 2 and/or usages in excess of those specified in Part 1 and Part 2, provided that the owner/operator can demonstrate that all of the following are satisfied:
 - a. Total POC emissions from each of S-14, S-15, and/or S-16 do not exceed 2,622 pounds in any consecutive 12-month period;
 - b. Total POC emissions from each of S-14, S-15, and/or S-16 do not exceed 30 pounds in any 24-hour period;
 - c. Total NPOC emissions from each of S-14, S-15, and/or S-16 do not exceed 0 pounds in any consecutive 12-month period or 24-hour period;
 - d. Benzene emissions from each of S-14, S-15, and/or S-16 do not exceed 138 lbs in any consecutive twelve-month period;
 - e. The maximum TVP of organic liquids stored in each of S-14, S-15, and/or S-16 does not exceed 7.10 psia; and
 - f. The use of these materials does not result in toxic emissions from each of S-14, S-15, and/or S-16 to exceed the following:
 - i. 139 lbs/yr and/or 0.06 lbs/hr for benzene emissions
 - ii. 139 lbs/yr for ethylbenzene emissions
 - iii. 27.8 lbs/yr for naphthalene emissions
 - g. The use of these materials does not result in toxic emissions from each of S-14, S-15, and/or S-16 and/or the combination of emissions from S-14, S-15, and S-16 combined to equal or exceed any toxic air contaminant trigger level (except benzene, ethylbenzene, and naphthalene) of Table 2-5-1 in Regulation 2-5.

(Basis: Cumulative Increase; Regulation 2-5)

5. The owner/operator of S-14, S-15, and/or S-16 shall ensure that the maximum benzene concentration in any hydrocarbon liquids stored in each of S-14, S-15, and/or S-16 shall not exceed 5.0% by weight. The owner/operator of S-14, S-15, and/or S-16 shall analyze all materials stored in S-14, S-15, and/or S-16 for benzene concentration at least once every 6 months. The owner/operator of S-14, S-15, and/or S-16 shall sample the materials stored in each S-14, S-15, and/or S-16 within 30 days of start-up. These records shall be kept on file for at least 5 years after the date of entry and shall be made available to District personnel upon request. All tests shall be performed in accordance with District approved laboratory procedures.

(Basis: Cumulative Increase, Regulation 2-5)

6. The owner/operator of S-14, S-15, and S-16 shall ensure that a properly installed, properly operated, and properly maintained per manufacturer's specification dome is in place at each of the tanks before storing any additional organic liquids in the tanks requested in application 31761 (gasoline, CARBOB gasoline blendstock, diesel fuel (BP Diesel™ and Phillips 66 Diesel™), jet fuel, crude oil, fuel oil, gas oil, high sulfur vacuum gas oil (VGO), and low sulfur VGO).

(Basis: BACT)

7. The owner/operator shall equip each S-14, S-15, and S-16 with a Mechanical Shoe primary seal and Rim Mounted secondary seal. There shall be no ungasketed roof fittings. Except for roof legs, each roof fitting shall be of the design, which yields the minimum roof fitting losses. The following list indicates the type of control required for a variety of typical roof fittings. Control techniques for roof fittings not included in this list shall be subject to District approval, prior to installing the roof on the tank.

Fitting Type	Control Technique
Access hatch	Bolted cover, gasketed
Guide pole / Well	Unslotted guide pole, gasketed Sliding cover; sliding cover; or Slotted with controls per API 2517 Addendum (See Note 1)
Gauge float well	Bolted cover, gasketed
Gauge hatch / Sample well	Weighted mechanical actuation, gasketed
Vacuum breaker	Weighted mechanical actuation, gasketed
Roof drain	Roof drain does not drain water into product
Roof leg	Fixed; or adjustable with vapor seal boot, or gasket between roof leg and leg sleeve
Rim vent	Weighted mechanical actuation, gasketed

Note 1: Slotted Guide Pole Control Configuration, per Addendum to API Publication 2517, May 1994, shall include to following components:

- a. Sliding cover;
 - b. Well gasket;
 - c. Pole sleeve with pole wiper approximately 6 inches above sliding cover, or District approved equivalent;
 - d. Float with float wiper approximately 1 inch above the sliding cover, or alternatively a float with multiple wipers.
- (Basis: BACT)

8. The owner/operator of S-14, S-15, and/or S-16 shall not exceed total organic compound concentrations of 100 ppmv in valves and flanges unless the owner/operator complies with the applicable minimization and repair provisions contained in Regulation 8-18.
(Basis: Cumulative Increase, Regulation 8-18-302, Regulation 8-18-304)

9. Not more than 30 days after the startup of S-14, S-15, and S-16, the owner/operator shall provide the Air District’s Engineering Division with a final count of fugitive components installed. The owner/operator has been permitted for an emissions increase for the replacement of the following fugitive component counts as part of this project:

Valves	10
Flanges	13

 - a. The valves shall be either bellow valves, diaphragm valves, quarter-turn valves, live-loaded valves, or other low emissions valves.
 - b. The flanges shall have graphitic gaskets or Air District-approved equivalent.
 Once installed, the owner/operator shall ensure that the fugitive components shall comply with all applicable requirements including Regulation 8-18.
(Basis: BACT)

10. The owner/operator of S-14, S-15, and/or S-16 shall each not use any fugitive component that emits total organic compounds in excess of 5 pounds per day per component. The owner/operator shall ensure all pegged leakers are repaired or replaced as soon as possible and under no circumstance continue to leak for more than 90 days in any consecutive 12-month period.

(Basis: Cumulative Increase, Regulation 2-1-403)

11. The owner/operator of S-14, S-15, and/or S-16 shall assign an unique identification code to each valve, flange, connector, compressor, pump seal, and miscellaneous (other fitting) component. The facility shall keep the following records: The fitting identification code, the date of each inspection, and the corresponding leak concentration measured. Records shall be maintained for at least 5 years from the date of entry and shall be made available for inspection by District staff upon request.

(Basis: Regulation 2-1-403, Cumulative Increase, Recordkeeping)

12. The owner/operator of S-14, S-15, and/or S-16 shall inspect all valves installed as part of this project at least once every quarter and the flanges at least once biannually using a District approved handheld hydrocarbon analyzer. (Basis: Cumulative Increase, Regulation 2-1-403, Regulation 8-18-403)

13. To determine compliance with the above parts, the owner/operator of S-14, S-15, and/or S-16 shall maintain the following records and provide all of the data necessary to evaluate compliance with the above parts, including the following information:

- a. Quantities of each type of liquid stored in each of S-14, S-15, and S-16 tanks on a daily basis.
- b. If a material other than those specified in Parts 1 and 2 is stored, POC, NPOC, and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Part 4, on a monthly basis;
- c. The maximum TVP of organic liquids stored in each tank; and
- d. Daily throughput and/or emission calculations shall be totaled for each consecutive twelve-month period.
- e. Benzene concentration in each of S-14, S-15, and S-16.
- f. Unique identification code of each fugitive component identified in Parts 9 and 11.
- g. Date of each leak inspection, and the corresponding leak concentration measured.
- h. Number of days that each individual component leaked at or greater than 10,000 ppmv (measured as C1), type of component, identification number of components. The midpoint method shall be used to determine the number of days leaking at or greater than 10,000 ppmv.
- i. The total number of days a component identified in Part 13(h) leaked.
- j. Quarterly and biannual inspection records as per Part 12.

All records shall be retained on-site for five years, from the date of entry, and made available for inspection by District staff upon request. These recordkeeping requirements shall not replace the recordkeeping requirements contained in any applicable District Regulation.

(Basis: Cumulative Increase; Regulation 2-5)

RECOMMENDATION

I recommend the Air District issue TransMontaigne Operating Company an Authority to Construct to modify the following source:

- S-14 Domed External Floating Roof Tank (T-14) storing various organic liquids, Maximum Capacity: 21 million (MM) gallons, Maximum True Vapor Pressure (TVP): 7.10 pounds per square inch absolute (psia)**
- S-15 Domed External Floating Roof Tank (T-15) storing various organic liquids, Maximum Capacity: 21 MM gallons, Maximum TVP: 7.10 psia**
- S-16 Domed External Floating Roof Tank (T-16) storing various organic liquids, Maximum Capacity: 21 MM gallons, Maximum TVP: 7.10 psia**

By: _____
Christopher Ablaza
Air Quality Engineer

Date _____

Attachments:
- Attachment A