STATE OF MISSISSIPPI
AIR POLLUTION CONTROL
TITLE V PERMIT

TO OPERATE AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

TransMontaigne Operating Company LP, Collins Piedmont Terminal Number 2
135 Highway 588 East
Collins, Mississippi
Covington County

has been granted permission to operate air emissions equipment in accordance with emission limitations, monitoring requirements and conditions set forth herein. This permit is issued in accordance with Title V of the Federal Clean Air Act (42 U.S.C.A. § 7401 - 7671) and the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

Permit Issued: _____

Effective Date: As specified herein.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

_____

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Expires:[Date not to exceed 5 years from issuance] **Permit No.: 0640-00011**

Draft/Proposed

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SECTION 1. GENERAL CONDITIONS

1.1 The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(a).)

1.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(b).)

1.3 This permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(c).)

1.4 Prior to its expiration, this permit may be reopened in accordance with the provisions listed below.

(a) This permit shall be reopened and revised under any of the following circumstances:

(1) Additional applicable requirements under the Federal Act become applicable to a major Title V source with a remaining permit term of 3 or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended.

(2) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

(3) The Permit Board or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.

(4) The Administrator or the Permit Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

(b) Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall only affect those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

(c) Reopenings shall not be initiated before a notice of such intent is provided to the Title V source by the DEQ at least 30 days in advance of the date that the permit is to be reopened, except that the Permit Board may provide a shorter time period in the case of an emergency.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.G.)

1.5 The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permittee or, for information to be confidential, the permittee shall furnish such records to DEQ along with a claim of confidentiality. The permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(e).)

1.6 This permit does not convey any property rights of any sort, or any exclusive privilege.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(6)(d).)

1.7 The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(5).)

1.8 The permittee shall pay to the DEQ an annual permit fee. The amount of fee shall be determined each year based on the provisions of regulated pollutants for fee purposes and the fee schedule specified in the Commission on Environmental Quality's order which shall be issued in accordance with the procedure outlined in Regulation 11 Miss. Admin. Code Pt. 2, Ch. 6.

(a) For purposes of fee assessment and collection, the permittee shall elect for actual or allowable emissions to be used in determining the annual quantity of emissions unless the Commission determines by order that the method chosen by the applicant for calculating actual emissions fails to reasonably represent actual emissions. Actual emissions shall be calculated using emission monitoring data or direct emissions measurements for the pollutant(s); mass balance calculations such as the amounts of

the pollutant(s) entering and leaving process equipment and where mass balance calculations can be supported by direct measurement of process parameters, such direct measurement data shall be supplied; published emission factors such as those relating release quantities to throughput or equipment type (e.g., air emission factors); or other approaches such as engineering calculations (e.g., estimating volatilization using published mathematical formulas) or best engineering judgments where such judgments are derived from process and/or emission data which supports the estimates of maximum actual emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

(b) If the Commission determines that there is not sufficient information available on a facility's emissions, the determination of the fee shall be based upon the permitted allowable emissions until such time as an adequate determination of actual emissions is made. Such determination may be made anytime within one year of the submittal of actual emissions data by the permittee.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.A(2).)

(c) If at any time within the year the Commission determines that the information submitted by the permittee on actual emissions is insufficient or incorrect, the permittee will be notified of the deficiencies and the adjusted fee schedule. Past due fees from the adjusted fee schedule will be paid on the next scheduled quarterly payment time.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D(2).)

(d) The fee shall be due September 1 of each year. By July 1 of each year the permittee shall submit an inventory of emissions for the previous year on which the fee is to be assessed. The permittee may elect a quarterly payment method of four (4) equal payments; notification of the election of quarterly payments must be made to the DEQ by the first payment date of September 1. The permittee shall be liable for penalty as prescribed by State Law for failure to pay the fee or quarterly portion thereof by the date due.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.D.)

(e) If in disagreement with the calculation or applicability of the Title V permit fee, the permittee may petition the Commission in writing for a hearing in accordance with State Law. Any disputed portion of the fee for which a hearing has been requested will not incur any penalty or interest from and after the receipt by the Commission of the hearing petition.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.6.C.)

1.9 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(8).)

1.10 Any document required by this permit to be submitted to the DEQ shall contain a certification by a responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.2.E.)

1.11 The permittee shall allow the DEQ, or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to perform the following:

(a) enter upon the permittee's premises where a Title V source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;

(b) have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

(d) as authorized by the Federal Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(2).)

1.12 Except as otherwise specified or limited herein, the permittee shall have necessary sampling ports and ease of accessibility for any new air pollution control equipment, obtained after May 8, 1970, and vented to the atmosphere.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(1).)

1.13 Except as otherwise specified or limited herein, the permittee shall provide the necessary sampling ports and ease of accessibility when deemed necessary by the Permit Board for air pollution control equipment that was in existence prior to May 8, 1970.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.I(2).)

1.14 Compliance with the conditions of this permit shall be deemed compliance with any

applicable requirements as of the date of permit issuance where such applicable requirements are included and are specifically identified in the permit or where the permit contains a determination, or summary thereof, by the Permit Board that requirements specifically identified previously are not applicable to the source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(1).)

1.15 Nothing in this permit shall alter or affect the following:

(a) the provisions of Section 303 of the Federal Act (emergency orders), including the authority of the Administrator under that section;

(b) the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

(c) the applicable requirements of the acid rain program, consistent with Section 408(a) of the Federal Act.

(d) the ability of EPA to obtain information from a source pursuant to Section 114 of the Federal Act.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.F(2).)

1.16 The permittee shall comply with the requirement to register a Risk Management Plan if permittee's facility is required pursuant to Section 112(r) of the Act to register such a plan.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.H.)

1.17 Expiration of this permit terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. A timely application is one which is submitted at least six (6) months prior to expiration of the Title V permit. If the permittee submits a timely and complete application, the failure to have a Title V permit is not a violation of regulations until the Permit Board takes final action on the permit application. This protection shall cease to apply if, subsequent to the completeness determination, the permittee fails to submit by the deadline specified in writing by the DEQ any additional information identified as being needed to process the application.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.C(2)., R. 6.4.B., and R. 6.2.A(1)(c).)

1.18 The permittee is authorized to make changes within their facility without requiring a permit revision (ref: Section 502(b)(10) of the Act) if:

(a) the changes are not modifications under any provision of Title I of the Act;

(b) the changes do not exceed the emissions allowable under this permit;

(c) the permittee provides the Administrator and the Department with written notification in advance of the proposed changes (at least seven (7) days, or such other time frame as provided in other regulations for emergencies) and the notification includes:

(1) a brief description of the change(s),

(2) the date on which the change will occur,

(3) any change in emissions, and

(4) any permit term or condition that is no longer applicable as a result of the change;

(d) the permit shield shall not apply to any Section 502(b)(10) change.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.F(1).)

1.19 Should the Executive Director of the Mississippi Department of Environmental Quality declare an Air Pollution Emergency Episode, the permittee will be required to operate in accordance with the permittee's previously approved Emissions Reduction Schedule or, in the absence of an approved schedule, with the appropriate requirements specified in 11 Miss. Admin. Code Pt. 2, Ch. 3., "Regulations for the Prevention of Air Pollution Emergency Episodes" for the level of emergency declared.

(Ref.: 11 Miss. Admin. Code Pt. 2, Ch. 3.)

1.20 Except as otherwise provided herein, a modification of the facility may require a Permit to Construct in accordance with the provisions of Regulations 11 Miss. Admin. Code Pt. 2, Ch. 2., "Permit Regulations for the Construction and/or Operation of Air Emissions Equipment", and may require modification of this permit in accordance with Regulations 11 Miss. Admin. Code Pt. 2, Ch. 6., "Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act". Modification is defined as "[a]ny physical change in or change in the method of operation of a facility which increases the actual emissions or the potential uncontrolled emissions of any air pollutant subject to regulation under the Federal Act emitted into the atmosphere by that facility or which results in the emission of any air pollutant subject to regulation under the Federal Act into the atmosphere not previously emitted. A physical change or change in the method of operation shall not include:

(a) routine maintenance, repair, and replacement;

(b) use of an alternative fuel or raw material by reason of an order under Sections 2 (a) and (b) of the Federal Energy Supply and Environmental Coordination Act of 1974 (or any superseding legislation) or by reason of a natural gas curtailment plan

pursuant to the Federal Power Act;

(c) use of an alternative fuel by reason of an order or rule under Section 125 of the Federal Act;

(d) use of an alternative fuel or raw material by a stationary source which:

(1) the source was capable of accommodating before January 6, 1975, unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR 51, Subpart I, or 40 CFR 51.166; or

(2) the source is approved to use under any permit issued under 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, or 40 CFR 51.166;

(e) an increase in the hours of operation or in the production rate unless such change would be prohibited under any federally enforceable permit condition which was established after January 6, 1975, pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Subpart I or 40 CFR 51.166; or

(f) any change in ownership of the stationary source.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(15).)

1.21 Any change in ownership or operational control must be approved by the Permit Board.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.4.D(4).)

1.22 This permit is a Federally approved operating permit under Title V of the Federal Clean Air Act as amended in 1990. All terms and conditions, including any designed to limit the source's potential to emit, are enforceable by the Administrator and citizens under the Federal Act as well as the Commission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.B(1).)

1.23 Except as otherwise specified or limited herein, the open burning of residential, commercial, institutional, or industrial solid waste, is prohibited. This prohibition does not apply to infrequent burning of agricultural wastes in the field, silvicultural wastes for forest management purposes, land-clearing debris, debris from emergency clean-up operations, and ordnance. Open burning of land-clearing debris must not use starter or auxiliary fuels which cause excessive smoke (rubber tires, plastics, etc.); must not be performed if prohibited by local ordinances; must not cause a traffic hazard; must not take place where there is a High Fire Danger Alert declared by the Mississippi Forestry Commission or Emergency Air Pollution Episode Alert imposed by the Executive Director and must meet

the following buffer zones.

(a) Open burning without a forced-draft air system must not occur within 500 yards of an occupied dwelling.

(b) Open burning utilizing a forced-draft air system on all fires to improve the combustion rate and reduce smoke may be done within 500 yards of but not within 50 yards of an occupied dwelling.

(c) Burning must not occur within 500 yards of commercial airport property, private air fields, or marked off-runway aircraft approach corridors unless written approval to conduct burning is secured from the proper airport authority, owner or operator.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.G.)

1.24 Except as otherwise specified herein, the permittee shall be subject to the following provision with respect to emergencies:

(a) Except as otherwise specified herein, an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

(b) An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions specified in (c) following are met.

(c) The affirmative defense of emergency shall be demonstrated through properly signed contemporaneous operating logs, or other relevant evidence that include information as follows:

(1) an emergency occurred and that the permittee can identify the cause(s) of the emergency;

(2) the permitted facility was at the time being properly operated;

(3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

(4) the permittee submitted notice of the emergency to the DEQ within 2 working

days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(d) In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

(e) This provision is in addition to any emergency or upset provision contained in any applicable requirement specified elsewhere herein.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.G.)

1.25 Except as otherwise specified herein, the permittee shall be subject to the following provisions with respect to upsets, startups, and shutdowns.

(a) Upsets (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) For an upset, the Commission may pursue an enforcement action for noncompliance with an emission standard or other requirement of an applicable rule, regulation, or permit. In determining whether to pursue enforcement action, and/or the appropriate enforcement action to take, the Commission may consider whether the source has demonstrated through properly signed contemporaneous operating logs or other relevant evidence the following:

(i) An upset occurred and that the source can identify the cause(s) of the upset;

(ii) The source was at the time being properly operated;

(iii) During the upset the source took all reasonable steps to minimize levels of emissions that exceeded the emission standard or other requirement of an applicable rule, regulation, or permit;

(iv) That within 5 working days of the time the upset began, the source submitted a written report to the Department describing the upset, the steps taken to mitigate excess emissions or any other noncompliance, and the corrective actions taken and;

(v) That as soon as practicable but no later than 24 hours of becoming aware of an upset that caused an immediate adverse impact to human health or the environment beyond the source boundary or caused a general nuisance to the public, the source provided notification to the Department.

(2) In any enforcement proceeding by the Commission, the source seeking to

establish the occurrence of an upset has the burden of proof.

(3) This provision is in addition to any upset provision contained in any applicable requirement.

(4) These upset provisions apply only to enforcement actions by the Commission and are not intended to prohibit EPA or third party enforcement actions.

(b) Startups and Shutdowns (as defined in 11 Miss. Admin. Code Pt. 2, R. 1.2.)

(1) Startups and shutdowns are part of normal source operation. Emission limitations apply during startups and shutdowns unless source specific emission limitations or work practice standards for startups and shutdowns are defined by an applicable rule, regulation, or permit.

(2) Where the source is unable to comply with existing emission limitations established under the State Implementation Plan (SIP) and defined in this regulation, 11 Mississippi Administrative Code, Part 2, Chapter 1, the Department will consider establishing source specific emission limitations or work practice standards for startups and shutdowns. Source specific emission limitations or work practice standards established for startups and shutdowns are subject to the requirements prescribed in 11 Miss. Admin. Code Pt. 2, R. 1.10.B(2)(a) through (e).

(3) Where an upset as defined in Rule 1.2 occurs during startup or shutdown, see the upset requirements above.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

1.26 The permittee shall comply with all applicable standards for demolition and renovation activities pursuant to the requirements of 40 CFR Part 61, Subpart M, as adopted by reference in Regulation 11 Miss Admin. Code Pt. 2, R. 1.8. The permittee shall not be required to obtain a modification of this permit in order to perform the referenced activities.

(Ref.: 11 Miss Admin. Code Pt. 2, R. 1.8.)

SECTION 2. EMISSION POINTS & POLLUTION CONTROL DEVICES

Emission Point	Description
AA-000	Bulk Gasoline Terminal
AA-001	12,675,600 gallon, cone roof, distillate or jet fuel storage tank (Tank # 5907).
AA-002	15,315,300 gallon, external floating roof, gasoline or lower vapor pressure product storage tank (Tank # 5908)
AA-003	15,315,300 gallon, external floating roof, gasoline or lower vapor pressure product storage tank (Tank # 5909)
AA-004	15,842,400 gallon, external floating roof, gasoline or lower vapor pressure product storage tank (Tank # 5910)
AA-007	7,392,000 gallon, internal floating roof, gasoline or lower vapor pressure product storage tank (Tank # 5911)
AA-008	7,392,000 gallon, internal floating roof, gasoline or lower vapor pressure product storage tank (Tank # 5912)
AA-009	7,392,000 gallon, internal floating roof, gasoline or lower vapor pressure product storage tank (Tank # 5913)
AA-010	7,392,000 gallon, internal floating roof, gasoline or lower vapor pressure product storage tank (Tank # 5914)
AA-011	21,546 gallon, horizontal, PCW/distillate storage tank (Frac Tank).
AA-012	12,182,772 gallon internal floating roof, gasoline storage tank (Tank #5915)
AA-013	12,182,772 gallon internal floating roof, gasoline storage tank (Tank #5916)
AA-014	12,182,772 gallon internal floating roof, gasoline storage tank (Tank #5917)
AA-015	12,182,772 gallon internal floating roof, gasoline storage tank (Tank #5918)
AA-016	11,421,312 gallon internal floating roof, gasoline storage tank (Tank #5919)
AA-017	11,421,312 gallon internal floating roof, gasoline storage tank (Tank #5920)
AA-018	8,756,370 gallon internal floating roof, gasoline storage tank (Tank #5921)
AA-019	1,381,842 gallon internal floating roof, gasoline storage tank (Tank #5922)
AA-020	376,026 gallon internal floating roof, gasoline storage tank (Tank #5923)
AA-021	1,586,298 gallon internal floating roof, gasoline storage tank (Tank #5924)
AA-022	16,800 gallon fixed roof Transmix tank (petroleum mixture consisting primarily of distillate) (Tank #Transmix A)
AA-023	16,800 gallon fixed roof Transmix tank (petroleum mixture consisting primarily of distillate) (Tank #Transmix B)
AA-024	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5925)
AA-025	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5926)

Emission Point	Description
AA-026	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5927)
AA-027	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5928)
AA-028	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5929)
AA-029	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5930)
AA-030	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5931)
AA-031	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5932)
AA-032	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5933)
AA-033	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5934)
AA-034	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5935)
AA-035	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5936)
AA-036	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5937)
AA-037	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5938)
AA-038	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5939)
AA-039	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5940)
AA-040	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5941)
AA-041	12,181,932 gallon internal floating roof tank used to store refined petroleum liquids including gasoline, jet kerosene, distillate, or other refined petroleum liquids (Tank #5942)
AA-042	Internal Floating Roof Landings for 18 storage tanks AA-024 through AA-041 (Tank #5925 - 5942 roof landing losses) including 18 low leg roof landings and 18 high leg roof landings. Each landing event duration of 48 hours.
AA-043	Truck Loading Rack equipped with emissions routed to a vapor control unit (VCU)
AA-044	Fugitive emissions from equipment in gasoline service and butane blending
AA-045	16,800 gallon fixed roof Transmix tank (petroleum mixture consisting primarily of distillate) (Tank #Transmix C)

SECTION 3. EMISSION LIMITATIONS & STANDARDS

A. Facility-Wide Emission Limitations & Standards

3.A.1 Except as otherwise specified or limited herein, the permittee shall not cause, permit, or allow the emission of smoke from a point source into the open air from any manufacturing, industrial, commercial or waste disposal process which exceeds forty (40) percent opacity subject to the exceptions provided in (a) & (b).

(a) Startup operations may produce emissions which exceed 40% opacity for up to fifteen (15) minutes per startup in any one hour and not to exceed three (3) startups per stack in any twenty-four (24) hour period.

(b) Emissions resulting from soot blowing operations shall be permitted provided such emissions do not exceed 60 percent opacity and provided further that the aggregate duration of such emissions during any twenty-four (24) hour period does not exceed ten (10) minutes per billion BTU gross heating value of fuel in any one hour.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.A.)

3.A.2 Except as otherwise specified or limited herein, the permittee shall not cause, allow, or permit the discharge into the ambient air from any point source or emissions, any air contaminant of such opacity as to obscure an observer's view to a degree in excess of 40% opacity, equivalent to that provided in Paragraph 3.A.1. This shall not apply to vision obscuration caused by uncombined water droplets.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.B.)

3.A.3 This permit was issued to the TransMontaigne Operating Company LP, Collins Piedmont Terminal Number 2, as a contiguous and adjacent operation under common control and ownership that is considered one source with the TransMontaigne Operating Company LP, Collins Piedmont Terminal Number 1, which is permitted individually under Air Operating Permit No. 0640-00016. Emissions from both facilities shall be considered when determining applicability to regulations with emissions thresholds.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.C(2).)

B. Emission Point Specific Emission Limitations & Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-024 through AA-044	PSD Construction Permit issued June 9, 2017	3.B.1	N/A	Certification of Construction
AA-024 through AA-041	PSD Construction Permit issued June 9, 2017	3.B.2	Tank Requirements	Roof and seal requirements (BACT Requirement)
		3.B.3	VOC	≤148.6 tons/year on a 12-month rolling total basis (excludes tank roof landing emissions)
		3.B.4	Roof Landing Requirements	Tank design and work practice plan (BACT Requirement)
		3.B.5	VOC	Roof landing emissions ≤132.9 tons/year on a 12-month rolling total basis
		3.B.6	Blending Operations	Butane tanks associated with each storage tank
		3.B.7	Product Storage	Limited to refined petroleum products
AA-043	PSD Construction Permit issued June 9, 2017	3.B.8	VOC	Vapor control unit ≥ 98% control efficiency (BACT Limit)
	11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).	3.B.9	PM	0.6 lbs/MMBTU
AA-002 AA-003	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 40 CFR 60.110(a) and (c)(2) and 60.112(a)(1), Subpart K	3.B.10	VOC	Applicability Install floating roof

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-004 AA-007 through AA-010 AA-012 through AA-021 AA-024 through AA-041	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 60.110b(a), Subpart Kb	3.B.11	VOC	Applicability
	40 CFR 60.112b(a)(1) and (2), Subpart Kb	3.B.12		Install either internal or external floating roof
AA-043	40 CFR 60, Subpart XX Standards of Performance for Bulk Gasoline Terminals 40 CFR 60.500(a), Subpart XX	3.B.13	VOC	Applicability
AA-043	60.502(a), (b), (e), (f), (g), (h), and (i), Subpart XX	3.B.14	VOC	Emission standards, vapor-tight tank requirements, tank gauge pressure during product loading
AA-002 through AA-004 AA-007 through AA-010 AA-012 through AA-021 AA-024 through AA-044	40 CFR 63, Subpart BBBBBB NESHAP for Source Category: Gasoline Bulk Terminals, Bulk Plants, and Pipeline Facilities 40 CFR 63.11080, 63.11081(a)(1), 63.11082(a), (b), and (d), and 63.11083(a)(2) and (b), Subpart BBBBBB and PSD Construction Permit issued June 9, 2017	3.B.15	HAP	Applicability
	40 CFR 63.11085(a) and (b), Subpart BBBBBB	3.B.16		General compliance requirements
	40 CFR 63.11087(a), (b), (f) and Table 1, Subpart BBBBBB	3.B.17		Internal and external floating roof requirements
AA-043	40 CFR 63.11088(a), (c), and Table 2, Subpart BBBBBB	3.B.18		Loading rack requirements

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-002 through AA-004 AA-007 through AA-010 AA-012 through AA-021 AA-024 through AA-044	40 CFR 63, Subpart R NESHAP for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) 40 CFR 63.420, Subpart R (Upon certification of construction such that potential HAP emissions exceed 25 tpy total or 10 tpy for an individual HAP, determined using potential emissions from both Terminals 1 and 2)	3.B.19	HAP	Applicability

3.B.1 Upon certification of construction, the permittee shall operate Emission Points AA-024 through AA-044 in accordance with the applicable requirements of this permit.

(Ref.: PSD Construction Permit issued June 9, 2017)

3.B.2 For Emission Points AA-024 through AA-041, each refined petroleum liquid storage tank shall be constructed with a fixed roof in combination with an internal floating roof with a mechanical shoe primary seal and a rim mounted secondary seal.

(Ref.: PSD Construction Permit issued June 9, 2017)

3.B.3 For Emission Points AA-024 through AA-041, the permittee shall limit the total combined VOC emissions during normal operation (excludes emissions from tank landings) to less than or equal to 148.6 tons/year on a 12-month rolling total basis.

(Ref. PSD Construction Permit issued June 9, 2017)

3.B.4 For Emission Points AA-024 through AA-041, each storage tank shall be designed to be drained dry and the permittee shall comply with a MDEQ-approved work practice plan to reduce emissions during roof landings.

(Ref.: PSD Construction Permit issued June 9, 2017)

3.B.5 For Emission Points AA-024 through AA-041, the permittee shall limit the total combined VOC emissions from the tank roof landings to less than or equal to 132.9 tons/year on a 12-month rolling total basis.

(Ref.: PSD Construction Permit issued June 9, 2017)

3.B.6 The permittee is authorized to construct and operate eighteen (18) butane tanks and the associated piping from the tanks to Emission Points AA-024 through AA-041. The permittee is authorized to blend butane (per 40 CFR 80.82) and naphtha in the storage tanks.

(Ref.: PSD Construction Permit issued June 9, 2017)

3.B.7 For Emission Points AA-024 through AA-041, the permittee is limited to storing only refined petroleum products. The permittee shall not store any non-fined petroleum products (e.g., crude oil, natural gasoline, etc...).

(Ref.: PSD Construction Permit issued June 9, 2017)

3.B.8 For Emission Point AA-043, the permittee shall only load cargo trucks when emissions are being collected by a vapor collection system and controlled by a vapor combustion unit with a control efficiency of 98% or greater. Transmix loading shall be bottom loaded and the collection and control device shall be operated at all times material is being loaded.

(Ref.: PSD Construction Permit issued June 9, 2017)

3.B.9 Upon certification of construction for Emission Point AA-043, the maximum permissible emission of ash and/or particulate matter from fossil fuel burning installations of less than 10 million BTU per hour heat input shall not exceed 0.6 pounds per million BTU per hour heat input.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.3.D(1)(a).)

3.B.10 Emission Points AA-002 and AA-003 are subject to the requirements of the 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, 40 CFR 60, Subpart K. Each storage tank shall be equipped with a floating roof.

(Ref.: 40 CFR 60.110(a) and (c)(2) and 60.112(a)(1), Subpart K)

3.B.11 Emission Points AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-041 (upon certification of construction), are subject to the requirements of the Standards of Performance for Volatile Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60, Subpart Kb.

(Ref.: 40 CFR 60.110b(a), Subpart Kb)

3.B.12 Emission Point AA-004, shall be equipped with an external floating roof that meets the following specifications:

(a) Each floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal and the upper seal is referred to as the secondary seal.

(1) The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. Except as provided in 40 CFR 60.113b(b)(4), the seal shall completely cover the annular space between the edge of the floating roof and tank wall.

(2) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as allowed in 40 CFR 60.113b(b)(4).

(b) Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface. Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is to be equipped with a gasketed cover, seal, or lid that is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. Rim vents are to be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents are to be gasketed. Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.

(c) The roof shall be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

Emission Points AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-041 (upon certification of construction) shall be equipped with a fixed roof in combination with an internal floating roof that meets the following specifications:

(d) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

(e) Each internal floating roof shall be equipped with one of the following closure

devices between the wall of the storage vessel and the edge of the internal floating roof:

(1) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal) between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.

(2) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.

(3) A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.

(f) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid service.

(g) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

(h) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

(i) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

(j) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

(k) Each penetration of the internal floating roof that allows for the passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

(l) Each penetration of the internal floating roof that allows for the passage of a ladder shall have a gasketed sliding cover.

(Ref.: 40 CFR 60.112b(a)(1) and (2), Subpart Kb)

3.B.13 Upon certification of construction, Emission Point AA-043 is subject to the requirements of the Standards of Performance for Bulk Gasoline Terminals, 40 CFR 60, Subpart XX.

(Ref.: 40 CFR 60.500(a), Subpart XX)

3.B.14 Upon certification of construction for Emission Point AA-043, the loading rack shall be equipped with a vapor collection system designed to collect the total organic compound vapors displaced from gasoline tank trucks during product loading. Emissions from the vapor collection system due to loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded.

Liquid products shall only be loaded into vapor-tight gasoline tank trucks using the following procedures:

(a) The permittee shall obtain the vapor tightness documentation listed in Condition 5.14(b) for each gasoline tank truck which is to be loaded at the facility.

(b) The permittee shall require the tank identification number be recorded as each gasoline tank truck is loaded at the facility.

(1) The permittee shall cross-check each tank identification number obtained with the file of vapor tightness documentation within two (2) weeks after the corresponding tank is loaded, unless either of the following conditions are maintained:

(i) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or

(ii) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.

(2) If either the quarterly or semiannual cross-check required by (i) or (ii) above reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are met again.

(c) The permittee shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the facility within one (1) week of the documentation cross-check in paragraph (b).

(d) The permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is

obtained.

(e) Alternate procedures to those described in (a) through (d) for limiting gasoline tank truck loadings may be used upon application to, and approval by, the MDEQ.

The permittee shall act to assure that loadings of gasoline tank trucks at the facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system and that they are connected during each loading of a gasoline tank truck. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. No pressure-vacuum vent in the gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

(Ref.: 40 CFR 60.502(a), (b), (e), (f), (g), (h), and (i), Subpart XX)

3.B.15 Until such time the facility becomes a major HAP source, Emission Points AA-001 through AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-044 (upon certification of construction) are subject to the requirements of the National Emission Standards of Hazardous Air Pollutants (NESHAP) for Source Category: Gasoline Bulk Terminals, Bulk Plants, and Pipeline Facilities, 40 CFR 63, Subpart BBBBBB. For purposes of this subpart, Emission Points AA-001 through AA-004 and AA-007 through AA-010 are considered existing affected sources and Emission Points AA-012 through AA-021 and AA-024 through AA-044 are considered new affected sources.

Once the facility becomes a major HAP source, Emission Points AA-001 through AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-044 will be subject to the requirements of the NESHAP for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), 40 CFR 63, Subpart R, and the requirements of Subpart BBBBBB will no longer be applicable.

(Ref.: 40 CFR 63.11080, 63.11081(a)(1), 63.11082(a), (b), and (d), and 63.11083(a)(2) and (b), Subpart BBBBBB and PSD Construction Permit issued June 9, 2017)

3.B.16 Until such time the facility becomes a major HAP source, the permittee shall, at all times, operate and maintain Emission Points AA-001 through AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-044 (upon certification of construction), and any associated air pollution control and monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the MDEQ, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. The permittee shall keep records and submit reports as specified in Sections 5.B and 5.C.

(Ref.: 40 CFR 63.11085(a) and (b), Subpart BBBBBB)

3.B.17 For Emission Points AA-002 through AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-041 (upon certification of construction), the permittee shall equip each external and internal floating roof gasoline storage tank according to the requirements contained in Condition 3.B.11. The permittee shall be deemed in compliance with this Subpart BBBBBB requirement provided the storage tanks are in compliance with the control requirements contained in Condition 3.B.11. Such a determination is required to be included for each storage tank in the Notification of Compliance Status Report submitted in accordance with Condition 5.C.14.

(Ref.: 40 CFR 63.11087(a), (b), (f), and Table 1, Subpart BBBBBB)

3.B.18 For Emission Point AA-043, the permittee shall equip the loading rack with a vapor collection system designed to collect the total organic compound (TOC) vapors displaced from cargo tanks during product loading to a level less than or equal to 80 mg/liter of gasoline loaded. The vapor collection system shall be designed to prevent any TOC vapors collected at one loading rack or lane from passing through another loading rack or lane to the atmosphere. The permittee shall load gasoline into gasoline cargo tanks that are determined to be vapor tight in accordance with Condition 3.B.13.

(Ref.: 40 CFR 63.11088(a), (c), and Table 2, Subpart BBBBBB)

3.B.19 As a result of completing construction allowed by the PSD Construction Permit issued June 9, 2017, or other approved construction activities, should the facility's potential to emit (calculated as the combined emissions from Terminals 1 and 2) exceed the major source HAP threshold of 25 tpy for total HAP or 10 tpy for any individual HAP, Emission Points AA-002 through AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-044 will be subject to and shall immediately comply with the applicable requirements of the NESHAP for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), 40 CFR 63, Subpart R. For purposes of this subpart, Emission Point AA-004 is the only affected source that will be considered as an existing source.

(Ref.: 40 CFR 63.420, Subpart R)

C. Insignificant and Trivial Activity Emission Limitations & Standards

No insignificant activities reported in the source's Title V application.

D. Work Practice Standards

Emission Point(s)	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limit/Standard
AA-024 through AA-041	PSD Construction Permit issued June 9, 2017	3.D.1	VOC	Work practice plan to minimize emissions during tank roof landings (BACT Requirement)
AA-044		3.D.2		Work practice plan to monitor components for fugitive leaks (BACT Requirement)

3.D.1 For Emission Points AA-024 through AA-041, the permittee shall develop and implement a work practice plan to minimize emissions during tank roof landings.

(Ref.: PSD Construction Permit issued June 9, 2017)

3.D.2 For Emission Point AA-044, the permittee shall develop and implement a work practice plan which describes in detail how the permittee will monitor all components for leaks. This plan shall identify all components that are to be monitored, the method that will be used to detect leaks, the frequency of monitoring, and how the results from each monitoring event will be recorded and reported.

(Ref.: PSD Construction Permit issued June 9, 2017)

SECTION 4. COMPLIANCE SCHEDULE

4.1 Unless otherwise specified herein, the permittee shall be in compliance with all requirements contained herein upon issuance of this permit.

4.2 Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices, by January 31 for the preceding calendar year. Each compliance certification shall include the following:

(a) the identification of each term or condition of the permit that is the basis of the certification;

(b) the compliance status;

(c) whether compliance was continuous or intermittent;

(d) the method(s) used for determining the compliance status of the source, currently and over the applicable reporting period;

(e) such other facts as may be specified as pertinent in specific conditions elsewhere in this permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.C(5)(a), (c), & (d).)

4.3 The facility shall become subject to the requirements of the NESHAP for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations), 40 CFR 63, Subpart R once the permittee has completed construction allowed by the PSD Construction Permit issued June 9, 2017, or other approved construction activities, which cause the facility's potential to emit exceed the major source HAP threshold of 25 tpy for total HAP or 10 tpy for any individual HAP. HAP emissions from the Collins Piedmont Number 1 facility must be included in the determination of facility-wide HAP emissions. As such, the permittee shall determine the potential HAP emissions for the facility upon certification of compliance of each emission unit in order to determine when the facility becomes a major HAP source. Once the facility becomes a major HAP source, the permittee shall submit a revised application within thirty (30) days of such date identifying the applicable emission limits, monitoring, recordkeeping and reporting requirements of Subpart R and shall request a modification of the TVOP to reflect these requirements.

(Ref.: PSD Construction Permit issued June 9, 2017)

SECTION 5. MONITORING, RECORDKEEPING & REPORTING REQUIREMENTS

A. General Monitoring, Recordkeeping and Reporting Requirements

5.A.1 The permittee shall install, maintain, and operate equipment and/or institute procedures as necessary to perform the monitoring and recordkeeping specified below.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.A.2 In addition to the recordkeeping specified below, the permittee shall include with all records of required monitoring information the following:

(a) the date, place as defined in the permit, and time of sampling or measurements;

(b) the date(s) analyses were performed;

(c) the company or entity that performed the analyses;

(d) the analytical techniques or methods used;

(e) the results of such analyses; and

(f) the operating conditions existing at the time of sampling or measurement.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(1).)

5.A.3 Except where a longer duration is specified in an applicable requirement, the permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(b)(2).)

5.A.4 Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period. All instances of deviations from permit requirements must be clearly identified in such reports and all required reports must be certified by a responsible official consistent with 11 Miss. Admin. Code Pt. 2, R. 6.2.E.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(1).)

5.A.5 Except as otherwise specified herein, the permittee shall report all deviations from permit requirements, including those attributable to upsets, the probable cause of such deviations, and any corrective actions or preventive measures taken. Said report shall be made within five (5) days of the time the deviation began.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3)(c)(2).)

5.A.6 Except as otherwise specified herein, the permittee shall perform emissions sampling and analysis in accordance with EPA Test Methods and with any continuous emission monitoring requirements, if applicable. All test methods shall be those versions, or their equivalents approved by the DEQ and the EPA.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

5.A.7 The permittee shall maintain records of any alterations, additions, or changes in equipment or operation.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).)

B. Specific Monitoring and Recordkeeping Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-024 through AA-041	PSD Construction Permit issued June 9, 2017	5.B.1	Butane/Naphtha throughputs	Monitoring and recordkeeping
		5.B.2	Refined petroleum product throughputs	Monitoring and recordkeeping
		5.B.3	VOC	Monitor emissions
	PSD Construction Permit issued June 9, 2017 and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).	5.B.4		Monitor and record information for each roof landing event
		5.B.5		Develop and implement gasoline blending plan
		5.B.6		Develop and implement monitoring plan
AA-002 AA-003	40 CFR 60.113(a), Subpart K	5.B.7	VOC	Recordkeeping
AA-004 AA-007 through AA-010 AA-012 through AA-021 AA-024 through AA-041	40 CFR 60.113b(a)(1)-(4) or (b)(1)-(4) and (6), Subpart Kb	5.B.8	VOC	Visual inspections
	40 CFR 60.115b(a)(2) and (b)(3), Subpart Kb	5.B.9		Recordkeeping
	40 CFR 60.116b(a), (b), (c), and (e), Subpart Kb	5.B.10		
AA-043	PSD Construction Permit issued June 9, 2017 and 11 Miss. Admin. Code, Pt. 2, R.6.3.A(3).	5.B.11	VOC	Performance test
		5.B.12		Develop and implement a design, operating, and monitoring plan
AA-043	40 CFR 60.502(j), Subpart XX	5.B.13	VOC	Monthly inspections for leaks
	40 CFR 60.503(a)-(d), Subpart XX	5.B.14		Performance testing
	40 CFR 60.505(a)-(f), Subpart XX	5.B.15		Recordkeeping

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/Parameter Monitored	Monitoring/Recordkeeping Requirement
AA-043	40 CFR 63.11088(d) and 63.11092(a)(1)(i) and (a)(2), Subpart BBBBBB	5.B.16	HAP	Performance testing
	40 CFR 63.11088(d) and 63.11092(b), (c), and (d), Subpart BBBBBB	5.B.17		Continuous monitoring system/parametric monitoring
AA-002 through AA-004 AA-007 through AA-010 AA-012 through AA-021 AA-024 through AA-041	40 CFR 63.11087(c) and 63.11092(e)(1) and (2), Subpart BBBBBB	5.B.18	HAP	Visual inspections
AA-000	40 CFR 63.11087(c) and 63.11092(f), Subpart BBBBBB	5.B.19	HAP	Annual certification test for gasoline cargo tanks
	40 CFR 63.11087(e) and 63.11094(a), (b)(1) and (2), and (c)(1) or (2), Subpart BBBBBB	5.B.20		Recordkeeping (cargo tanks)
	40 CFR 63.11089 (a) through (d) and (g), and 63.11094 (d) and (e), Subpart BBBBBB	5.B.21		Recordkeeping (equipment leaks)
	40 CFR 63.11087(e) and 63.11094(g), Subpart BBBBBB	5.B.22		Recordkeeping (malfunctions)
AA-000	PSD Construction Permit issued June 9, 2017	5.B.23	HAP	Monitoring
AA-044	PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).	5.B.24	VOC/HAP	Develop and implement fugitive component monitoring plan

5.B.1 For Emission Points AA-024 through AA-041, the permittee shall monitor and keep records of the daily butane and naphtha throughputs including the gallons of product unloaded and number of trucks of each product unloaded.

(Ref.: PSD Construction Permit issued June 9, 2017)

5.B.2 For Emission Points AA-024 through AA-041 (upon certification of construction), the permittee shall monitor and record the monthly throughput of each refined petroleum product using an automatic gauging system on each tank including gasoline, butane and naphtha, distillate, jet kerosene, and any other stored products.

(Ref.: PSD Construction Permit issued June 9, 2017)

5.B.3 For Emission Points AA-024 through AA-041 (upon certification of construction), the permittee shall use the monthly throughputs of refined petroleum products and butane and naphtha through each tank to calculate the 12-month rolling total of VOC emissions. The permittee shall use a calculation methodology approved by MDEQ.

(Ref.: PSD Construction Permit issued June 9, 2017)

5.B.4 Within thirty (30) days of the certification of construction of the first emission point (Emission Points AA-024 through AA-041), the permittee shall develop and implement a plan to minimize emissions that occur during roof landing events. All roof landing events shall be conducted in accordance with the plan and the records required for each roof landing event shall include the date, emission point, tank number, type of landing event (i.e., high leg, low leg), the purpose of the landing event (i.e., seasonal switching, cleaning, degreasing, etc.), duration in hours of each landing event, the number of annual landing events for each tank, the VOC emissions (tpy) during each roof landing event, the total annual VOC emissions (tpy) on a 12-month rolling total basis for each tank roof landing, and the total annual VOC emissions (tpy) on a 12-month rolling total basis for the roof landings for the eighteen tanks combined. Emissions shall be calculated using AP-42 Chapter 7 or an equivalent method approved by the MDEQ in writing.

(Ref.: PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).)

5.B.5 Within thirty (30) days of the certification of construction of the first emission point (AA-024 through AA-041), the permittee shall develop and implement a gasoline blending plan that includes a process description of the gasoline blending operation, method of monitoring butane throughput, and the method of monitoring Reid vapor pressure (RVP) of blended products.

(Ref.: PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).)

5.B.6 Within thirty (30) days of the certification of construction of the first emission point (Emission Points AA-024 through AA-041), the permittee shall develop and implement a monitoring plan that includes a description of the methods used to monitor throughput of

each product, monitor maximum true vapor pressure, bulk surface temperatures, ambient temperature, RVP, and any other site-specific information to show compliance with the VOC emission limits.

(Ref.: PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).)

5.B.7 For Emission Points AA-002 and AA-003, the permittee shall maintain a record of the petroleum liquid being stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period.

(Ref.: 40 CFR 60.113(a), Subpart K)

5.B.8 For Emission Points AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-041 (upon certification of construction), the permittee shall comply with the following visual inspection requirements for storage vessels with internal and external floating roof tanks.

Internal Floating Roof

(a) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with a volatile organic liquid (VOL). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the permittee shall repair the items before filling the storage vessel.

(b) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is a liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the MDEQ in the report required in Condition 5.C.12. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the permittee will take to assure that the control equipment will be repaired, or the vessel will be emptied as soon as possible.

(c) For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B) the permittee shall visually inspect the vessel as specified in paragraph (d) at least every 5 years or visually inspect the vessel as specified in paragraph (b).

(d) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs (b) and (c) and at intervals no greater than 5 years for vessels specified in paragraph (c).

External Floating Roof

(e) Determine the gap areas and maximum gap widths, between the primary seal and the wall of the storage vessel and between the secondary seal and the wall of the storage vessel according to the following frequency:

(1) Measurements of gaps between the tank wall and primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within 60 days of the initial fill with VOL and at least once every 5 years thereafter.

(2) Measurements of gaps between the tank wall and secondary seal shall be performed within 60 days of the initial fill with VOL and at least once per year thereafter.

(3) If the vessel ceases storing VOL for a period of one (1) year or more, subsequent introduction of VOL into the vessel shall be considered an initial fill for the purposes of (1) and (2) above.

(f) Determine gap widths and areas in the primary and secondary seals individually by the following procedures;

(1) Measure seal gaps, if any, at one or more floating roof levels when the roof is floating off the roof leg supports.

(2) Measure seal gaps around the entire circumference of the tank in each place where a 0.32 cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the wall of the storage vessel and measure the circumferential distance of each such location.

(3) The total surface area of each gap described in (2) of this section shall be determined by using probes of various widths to measure accurately the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance.

(g) Add the gap surface area of each gap location for the primary seal and the secondary seal individually and divide the sum for each seal by the nominal diameter of the tank and compare each ratio to the respective standards in paragraph (h).

(h) Make necessary repairs or empty the storage vessel within 45 days of identification in any inspection for seals not meeting the requirements listed below:

(1) The accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm^2 per meter of tank diameter, and the width of any portion of any gap shall not exceed 3.81 cm.

(i) One end of the mechanical shoe is to extend into the stored liquid, and the other end is to extend a minimum vertical distance of 61 cm above the stored liquid surface.

(ii) There are to be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope.

(2) The secondary seal shall meet the following requirements:

(i) The secondary seal is to be installed above the primary seal so that it completely covers the space between the roof edge and the tank wall except as provided in paragraph (b)(3).

(ii) The accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm^2 per meter of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm.

(iii) There are to be no holes, tears, or other openings in the seal or seal fabric.

(3) If a failure that is detected during inspections required in this condition cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the MDEQ in the report required in Condition 5.C.12. Such a request for an extension must include a demonstration of unavailability of alternate storage capacity and a specification of a schedule that will assure the control equipment will be repaired or the vessel will be emptied as soon as possible.

(i) Visually inspect the external floating roof, the primary seal, secondary seal, and fittings each time the vessel is emptied and degassed.

(Ref.: 40 CFR 60.113b(a)(1)-(4) or (b)(1)-(4) and (6), Subpart Kb)

5.B.9 For Emission Points AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-041(upon certification of construction), the permittee shall keep a record of each inspection performed as required in Condition 5.B.7.

For internal floating roof tanks, the records shall identify the storage vessel on which the inspection was performed and shall contain the date of the inspection and the observed condition of each component of the control equipment (i.e., seals, internal floating roof, and fittings).

For external floating roof tanks, the records shall identify the storage vessel in which the gap measurement was performed, the date of the measurement, the raw data obtained in the

measurement, and the calculations described in Condition 5.B.7 (e) and (f).

(Ref.: 40 CFR 60.115b(a)(2) and (b)(3), Subpart Kb)

5.B.10 For Emission Points AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-041 (upon certification of construction), the permittee shall keep the following records:

(a) Dimensions of each storage vessel and an analysis showing the capacity of each storage vessel.

(b) Records documenting the VOL being stored in each vessel, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period.

(c) Records on the storage temperature used to determine the maximum true vapor pressure as determined in 40 CFR 60.116b(e)(1)-(3).

Per Condition 5.A.3 the permittee must retain a copy of all records for a period of at least five (5) years from the date of the record. The permittee shall keep a copy of the records in paragraph (a) for the life of the source.

(Ref.: 40 CFR 60.116b(a), (b), (c), and (e), Subpart Kb)

5.B.11 Upon certification of construction for Emission Point AA-043, the permittee shall demonstrate compliance with the requirement to control VOC emissions (≥ 98%) by performance testing and submittal of the results within 180 days of startup of Transmix loading. Due to the variability of Transmix, the permittee is allowed to load gasoline or a high percentage gasoline Transmix during the performance test.

(Ref.: PSD Construction Permit issued June 9, 2017)

5.B.12 For Emission Point AA-043, the permittee shall develop a design and operating plan for the truck loading rack which shall include the number of arms for loading Transmix, the number of arms for unloading butane, the number of arms for unloading naphtha, the manufacturer's recommendations for operation of the truck loading rack and collection/control device. This plan shall include the maximum design throughput and potential to emit based on the worst-case scenario (i.e., loading trucks with previous gasoline load or loading trucks dedicated to Transmix only, number of trucks, number of arms, pump size, etc...) and any other information needed to determine the maximum throughput.

Additionally, the permittee shall also develop and implement a truck loading rack monitoring plan which shall include monitoring, recordkeeping, and reporting for each proposed scenario of operation (e.g., truck with previous gasoline load and trucks dedicated

to Transmix). This plan shall be submitted within thirty (30) days of the certification of construction.

(Ref.: PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).)

5.B.13 Upon certification of construction for Emission Point AA-043, the permittee shall inspect the vapor collection system, vapor processing system, and loading rack handling gasoline monthly (calendar) during the loading of gasoline tank trucks for total organic compound liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded, and the source of the leak shall be repaired within 15 calendar days after it is detected.

(Ref.: 40 CFR 60.502(j), Subpart XX)

5.B.14 Upon certification of construction for Emission Point AA-043, the permittee shall conduct performance tests in accordance with the requirements specified in 40 CFR 60.503(c) and (d). Immediately before the performance tests, the permittee shall use EPA Reference Method 21 to monitor for vapor leaks from all the potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test.

(Ref.: 40 CFR 60.503(a)-(d), Subpart XX)

5.B.15 Upon receipt of the certification of construction for Emission Point AA-043, the permittee shall keep the following records:

(a) The tank truck vapor tightness documentation required in Condition 3.B.13 shall be kept on file at the terminal in a permanent form available for inspection.

(b) The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by EPA Reference Method 27. This documentation shall include, as a minimum, the following information:

(1) Test title: Gasoline Delivery Tank Pressure Test - EPA Reference Method 27.
(2) Tank owner and address.
(3) Tank identification number.
(4) Testing location.
(5) Date of test.
(6) Tester name and signature.
(7) Witnessing inspector, if any: Name, signature, and affiliation.
(8) Test results: Actual pressure change in 5 minutes, mm of water (average for 2

runs).

(c) A record of each monthly leak inspection required in Condition 5.B.12 shall be kept on file at the terminal for at least five (5) years from the date of the record, per Condition 5.A.3. These records shall include, as a minimum, the following information:

(1) Date of inspection.

(2) Findings (may include no leaks discovered; or location, nature, and severity of each leak.

(3) Leak determination method.

(4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).

(5) Inspector name and signature.

(d) The permittee shall keep a copy of all notifications at the terminal for at least five (5) years after the date of the record, per Condition 5.A.3.

(e) In lieu of keeping a record at the terminal for each gasoline cargo tank test, the permittee may either keep an electronic copy of each record instantly available at the terminal an in accordance with the requirements in 40 CFR 60.505(e)(1)(i) and (ii) or by utilizing a terminal automation system that prevents gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., card lock-out system) and a copy of such documentation can be made available during the course of a site visit or within a mutually agreeable time frame.

(f) The permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least five (5) years from the date of the record, per Condition 5.A.3.

(Ref.: 40 CFR 60.505(a)-(f), Subpart XX)

5.B.16 Upon certification of construction for Emission Point AA-043, the permittee shall conduct a performance test on the vapor processing and collection systems by using the test methods identified in Condition 5.B.13 and 40 CFR 60.503(c) and (d) except a reading of 500 ppm shall be used to determine the level of leaks that are to be repaired. In lieu of the performance test required by Subpart BBBBBB, the permittee may submit a statement signed by a responsible official indicating the facility is in compliance with the Subpart BBBBBB emission limit of 80 mg/liter of gasoline loaded provided the permittee has demonstrated compliance with the 40 CFR 60, Subpart XX emission limit of 35 mg/liter of gasoline loaded.

(Ref.: 40 CFR 63.11088(d) and 63.11092(a)(1)(i) and (a)(2), Subpart BBBBBB)

5.B.17 Upon certification of construction for Emission Point AA-043, the permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS) while gasoline vapors are displaced to the vapor

processor systems in accordance with the requirements specified in 40 CFR 63.11092(b)(1)-(5). In the event an operating parameter during a performance test has changed from a value established in a previous performance test, the permittee shall document the reason for the change.

The permittee shall operate the vapor processing system in a manner not to exceed or not to go below, as appropriate, the operating parameter value or alternative operating parameter value established during the previous performance test. Operating the vapor processing system in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standard unless the permittee discovers a malfunction and takes corrective actions in accordance with the monitoring and inspection plan and complies with the requirements contained in 40 CFR 63.11092(d)(4)(i)-(v).

(Ref.: 40 CFR 63.11088(d) and 63.11092(b), (c), and (d), Subpart BBBBBB)

5.B.18 For Emission Points AA-002 through AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-041 (upon certification of construction), the permittee shall visually inspect the floating roof systems of each storage vessel in accordance with Condition 5.B.7.

(Ref.: 40 CFR 63.11087(c) and 63.11092(e)(1) and (2), Subpart BBBBBB)

5.B.19 For Emission Point AA-000, the annual certification test for gasoline cargo tanks shall consist of the following test methods.

(a) EPA Reference Method 27, Appendix A-8, 40 CFR 60 – Conduct the test using a time period (t) for the pressure and vacuum tests of 5 minutes. The initial pressure (P_i) for the pressure test shall be 460 millimeters (mm) of water (18 inches of water), gauge. The initial vacuum (V_i) for the vacuum test shall be 150 mm of water (6 inches of water), gauge. The maximum allowable pressure and vacuum changes (Δ p, Δv) for all affected gasoline cargo tanks is 3 inches of water, or less, in 5 minutes.

(b) Railcar bubble leak test procedures – As an alternative to the annual certification test required under (a), the permittee may comply with 40 CFR 63.11092(f)(2)(i) and (ii) provided the railcar cargo tank does not collect gasoline vapors from a vapor balance system and the system complies with a Federal, State, local, or tribal rule or permit. A vapor balance system is a piping and collection system designed to collect gasoline vapors displaced from a storage vessel, barge, or other container being loaded, and routes the displaced gasoline vapors into the railcar cargo tank from which liquid gasoline is being unloaded.

(Ref.: 40 CFR 63.11087(c) and 63.11092(f), Subpart BBBBBB)

5.B.20 For Emission Point AA-000 (cargo tanks), the permittee shall keep records of the test

results for each gasoline cargo tank loading at the facility as follows:

(a) Annual certification testing records and periodic railcar bubble leak testing performed under Condition 5.B.18.

(b) The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation shall include, as a minimum, the following information:

(1) Name of test: Annual Certification Test – Method 27 or Periodic Bubble Leak Test Procedure.

(2) Cargo tank owner's name and address.

(3) Cargo tank identification number.

(4) Test location and date.

(5) Tester name and signature.

(6) Witnessing inspector, if any: Name, signature, and affiliation.

(7) Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing.

(8) Test results: Test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition.

As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required above, the permittee may choose to either keep an electronic copy of the exact duplicate image of the original paper record with certifying signatures such that it is instantly available at the terminal or use a terminal automation system that prevents gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading. The permittee shall notify the MDEQ if the terminal chooses to use either alternative.

(Ref.: 40 CFR 63.11087(e) and 63.11094(a), (b)(1) and (2), and (c)(1) or (2), Subpart BBBBBB)

5.B.21 For Emission Point AA-000 (equipment leaks), the permittee shall perform a monthly leak inspection of all equipment that is in gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. The results from each inspection shall be kept in a log book, shall be signed by the permittee, and each shall identify the following:

(a) Each piece of equipment and identification number;

(b) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell);

(c) The date the leak was detected and the date of each attempt to repair the leak;

(d) Repair methods applied in each attempt to repair the leak;

(e) Repair delayed and the reason for the delay if the leak is not repaired within 15 days of discovery of the leak;

(f) The expected date of successful repair of the leak if the leak is not repaired within 15 days; and the date of successful repair of the leak.

The log book shall also contain a record consisting of a master list, summary description, or diagram showing the location of all equipment in gasoline service at the facility.

Additionally, once a leak is detected, the initial attempt to repair shall be made as soon as practicable, but no later than five (5) calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after the detection of each leak unless the repair is not feasible within this timeframe. If the repair is made within this timeframe, the permittee shall provide the reason(s) why the repair was not feasible and the date each repair was eventually completed in the semiannual report required in Condition 5.A.4.

(Ref.: 40 CFR 63.11089(a)-(d) and (g) and 63.11094(d) and (e), Subpart BBBBBB)

5.B.22 For Emission Point AA-000, the permittee shall keep records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. These records shall also include what actions were taken during the period of malfunction to minimize emissions, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation

(Ref.: 40 CFR 63.11087(e) and 63.11094(g), Subpart BBBBBB)

5.B.23 For Emission Point AA-000, the permittee shall review the facility's major source status for HAPs after certification of construction of each storage tank (Emission Points AA-024 through AA-041) or other emission unit for which construction is authorized. This evaluation shall include the potential emissions from the Collins Piedmont Number 1 facility.

(Ref.: PSD Construction Permit issued June 9, 2017)

5.B.24 For Emission Point AA-044, the permittee shall develop and implement a fugitive component monitoring plan that identifies all components, proposed method of monitoring leaks, frequency of leak monitoring, and method of recording and reporting results.

(Ref.: PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).)

C. Specific Reporting Requirements

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter Monitored	Reporting Requirement
AA-024 through AA-041	PSD Construction Permit issued June 9, 2017 and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).	5.C.1	Gasoline blending plan	Update plans
		5.C.2	Monitoring plan	
		5.C.3	Plan to minimize emissions during roof landing events	
	PSD Construction Permit issued June 9, 2017	5.C.4	Tank throughputs and VOC	Semi-annual report
AA-043	PSD Construction Permit issued June 9, 2017 and 11 Miss. Admin. Code Pt. 2, R. 6.3.A(3).	5.C.5	Monitoring plan	Update plans
		5.C.6	Design and operating plan	
	PSD Construction Permit issued June 9, 2017	5.C.7	VOC	Submit final design documentation
		5.C.8		Performance test results
AA-044	PSD Construction Permit issued June 9, 2017 and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).	5.C.9	Fugitive emissions monitoring plan	Submit plan
AA-000	PSD Construction Permit issued June 9, 2017	5.C.10	HAP	Submit emissions updates
AA-002 through AA-004 AA-007 through AA-010 AA-012 through AA-021 AA-024 through AA-041	40 CFR 60.113b(a)(5) and (b)(5), Subpart Kb	5.C.11	VOC	Submit notification
	40 CFR 60.115b(a)(3) and (4) and (b)(2) and (4), Subpart Kb	5.C.12		Inspection report

Emission Point(s)	Applicable Requirement	Condition Number	Pollutant/ Parameter Monitored	Reporting Requirement
AA-024 through AA-041	40 CFR 60.115b(a)(1), Subpart Kb and 40 CFR 60.7(a)(3), Subpart A	5.C.13	VOC	Initial startup notification
	40 CFR 63.11087(d) and 63.11093(b), Subpart BBBBBB and 40 CFR 63.9(h), Subpart A	5.C.14	HAP	Notification of Compliance Status
AA-043	40 CFR 63.11088(e) and 63.11093(c), Subpart BBBBBB and 40 CFR 63.9(e), Subpart A	5.C.15	HAP	Performance test notification
AA-000	40 CFR 63.11087(e), 63.11088(f), and 63.11095(a), Subpart BBBBBB	5.C.16	HAP	Semi-annual compliance report
	40 CFR 63.11087(e), 63.11088(f), and 63.11095(b) and (c), Subpart BBBBBB	5.C.17		Semi-annual excess emissions report
	40 CFR 63.11087(e), 63.11088(f), and 63.11095(d), Subpart BBBBBB	5.C.18		Semi-annual malfunction report

5.C.1 For Emission Points AA-024 through AA-041, the permittee shall update the gasoline blending plan required in Condition 5.B.5 within 30 days of any changes or within 30 days of receipt of comments from MDEQ. This plan shall be maintained on site and submitted to the MDEQ upon request.

(Ref.: PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).)

5.C.2 For Emission Points AA-024 through AA-041, the permittee shall update the monitoring plan required in Condition 5.B.6 within 30 days of any changes or within 30 days of receipt of comments from MDEQ. This plan shall be maintained on site and submitted to the MDEQ upon request.

(Ref.: PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).)

5.C.3 For Emission Points AA-024 through AA-041, the permittee shall update the plan to minimize short-term emissions during roof landing events required in Condition 5.B.4 within 30 days of any changes or within 30 days of receipt of comments from MDEQ. This plan shall be maintained on site and submitted to the MDEQ upon request.

(Ref.: PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R.6.3.A(3).)

5.C.4 For Emission Points AA-024 through AA-041, in accordance with Condition 5.A.4, the permittee shall submit semi-annual reports that summarize the monthly and total rolling 12-month throughputs of all products for each of the storage tanks (upon certification of construction) and for all tanks combined. This information shall be used to calculate the 12-month rolling total of VOC emissions. The emissions report should also identify the details (i.e., date, emission point, reason, duration, etc...) for each roof landing event, a summary of VOC emissions that occurred during each roof landing event, and a summary of the 12-month rolling total of VOC emissions attributable to roof landing events.

(Ref.: PSD Construction Permit issued June 9, 2017)

5.C.5 For Emission Point AA-043, the permittee shall update the truck loading rack monitoring plan required in Condition 5.B.11 within 30 days of any changes or within 30 days of receipt of comments from MDEQ. This plan shall be maintained on site and submitted to the MDEQ upon request.

(Ref.: PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).)

5.C.6 For Emission Point AA-043, the permittee shall update the design and operating plan required in Condition 5.B.11 within 30 days of any changes or within 30 days of receipt of comments from MDEQ. This plan shall be maintained on site and submitted to the MDEQ upon request.

(Ref.: PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).)

5.C.7 For Emission Point AA-043, the permittee shall submit documentation to show that the final design of the vapor control system will comply the requirement to meet the VOC control efficiency of greater than or equal to 98% before the loading of any Transmix begins.

(Ref.: PSD Construction Permit issued June 9, 2017)

5.C.8 For Emission Point AA-043, the permittee shall submit the results from the initial performance test within 180 days of startup of when Transmix loading begins in order to demonstrate compliance with the VOC control efficiency requirement.

(Ref.: PSD Construction Permit issued June 9, 2017)

5.C.9 For Emission Point AA-044, the permittee shall update the fugitive component monitoring

plan required in Condition 5.B.23 to address changes or upon receipt of comments from MDEQ. This plan shall be maintained on site and submitted to the MDEQ upon request.

(Ref.: PSD Construction Permit issued June 9, 2017, and 11 Miss. Admin. Code, Pt. 2, R. 6.3.A(3).)

5.C.10 For Emission Point AA-000, the permittee shall submit an update concerning the facility's major HAP source status in conjunction with submittal of the certification of construction required for each piece of equipment authorized by the PSD Construction Permit. The evaluation shall include emissions from the Collins Piedmont Number 1 facility.

(Ref.: PSD Construction Permit issued June 9, 2017)

5.C.11 For Emission Points AA-002 through AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-041 (upon certification of construction), the permittee shall notify the MDEQ in writing at least 30 days prior to filling or refilling each storage vessel for which an inspection is required by Condition 5.B.7 (a) through (d) or in advance of any gap measurements required by Condition 5.B.7 (e) to afford the MDEQ an opportunity to have an observer present. If the inspection required in Condition 5.B.7 (d) is not planned and the permittee could not have known about the inspection 30 days in advance of refilling the tank, the permittee shall notify the MDEQ at least seven (7) days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification, including written documentation, may be made in writing and sent by express mail provided it is received by the MDEQ at least seven (7) days prior to the refilling.

(Ref.: 40 CFR 60.113b(a)(5) and (b)(5), Subpart Kb)

5.C.12 For Emission Points AA-002 through AA-004, AA-007 through AA-010, AA-012 through AA-021, and AA-024 through AA-041 (upon construction), the permittee shall submit a report to the MDEQ within 30 days of an inspection for any storage vessel with a fixed roof and internal floating roof required in Condition 5.B.7 (b) or (c) if the inspection reveals any of the conditions described in Condition 5.B.7 (b) or (d) are present. The report shall identify which storage vessel was inspected, the nature of the defects that were discovered, and the date the storage vessel was emptied or the nature of and date the repair was made.

For storage vessels with an external floating roof, the permittee shall submit a report within 60 days of performing the seal gap measurements required in Condition 5.B.7 (e) that contains the date of the measurement, the raw data obtained during the measurement, and the calculations contained in Condition 5.B.7 (f) and (g). In the event the seal gap measurements detects gaps that exceed the limitations specified in Condition 5.B.7 (h), a report shall be submitted to the MDEQ within 30 days of the inspection that identifies the storage vessel, the date of the measurement, the raw data, the results of the calculations as noted above, and the date the vessel was emptied or the nature of and the date the repair

was made.

(Ref.: 40 CFR 60.115b(a)(3) and (4) and (b)(2) and (4), Subpart Kb)

5.C.13 Upon receipt of the certification of construction for Emission Points AA-024 through AA-041, the permittee shall submit a report to the MDEQ that describes the control equipment for each storage vessel and certifies that the control equipment meets the design specifications in Condition 3.B.11 and has been visually inspected in accordance with Condition 5.B.7. This report shall be included as an attachment to the initial notification of startup required by 40 CFR 60.7(a)(3). The initial notification of startup shall be postmarked within 15 days after such date.

(Ref.: 40 CFR 60.115b(a)(1), Subpart Kb and 40 CFR 60.7(a)(3), Subpart A)

5.C.14 For Emission Points AA-024 through AA-041, the permittee shall submit a Notification of Compliance Status with Subpart BBBBBB within 60 days after the permittee has determined a storage vessel is in compliance with the applicable requirements of Subpart BBBBBB. This notification can be combined with the notification required in Condition 5.C.13.

(Ref.: 40 CFR 63.11087(d) and 63.11093(b), Subpart BBBBBB and 40 CFR 63.9(h), Subpart A)

5.C.15 For Emission Point AA-043, the permittee shall submit a Notification of Performance Test to the MDEQ in writing of the intent to conduct a performance test at least 60 calendar days before the test is scheduled to begin in order to allow the MDEQ an opportunity to review and approve the site-specific test plan required in 40 CFR 63.7(c), if requested by MDEQ, and to have an observer present.

(Ref.: 40 CFR 63.11088(e), 63.11093(c), Subpart BBBBBB and 40 CFR 63.9(e), Subpart A)

5.C.16 For Emission Point AA-000, the permittee shall submit a semi-annual compliance report to the MDEQ in accordance with Condition 5.A.4 that contains the following information:

(a) For storage vessels, a summary of the results of any inspections conducted in accordance with Condition 5.B.7.

(b) For the loading rack, each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility.

(c) For equipment leak inspections, the number of equipment leaks not repaired within 15 days.

(Ref.: 40 CFR 63.11087(e), 63.11088(f), and 63.11095(a), Subpart BBBBBB)

5.C.17 For Emission Point AA-000, the permittee shall submit a semi-annual compliance report to the MDEQ in accordance with Condition 5.A.4 that contains information concerning the excess emissions events listed below that have occurred in the reporting period:

(a) Each instance of a non-vapor tight gasoline cargo tank loading at the facility in which the permittee failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained.

(b) Each reloading of a non-vapor tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with Condition 5.B.19.

(c) Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value. The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS.

(d) Each instance in which malfunctions discovered during monitoring and inspections were not resolved according to the necessary corrective actions described in the monitoring and inspection plan. The report shall include a description of the malfunction and the timing of the steps take to correct the malfunction.

(e) Each occurrence of an equipment leak for which no repair attempt was made within five (5) days or for which repair was not completed within 15 days after detection. The information for each occurrence shall include the date the leak was detected, the date of each attempt to repair the leak, the reasons for the delay of repair, and the date of successful repair.

This report is only due during a reporting period in which there was an excess emission event. If no such events occurred during the reporting period, no such report is required.

(40 CFR 63.11087(e), 63.11088(f), and 63.11095(b) and (c), Subpart BBBBBB)

5.C.18 For Emission Point AA-000, the permittee shall submit a semi-annual compliance report to the MDEQ in accordance with Condition 5.A.4 that contains information concerning the number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report should also include a description of actions taken during the malfunction to minimize emissions, including actions taken to correct a malfunction. No information concerning malfunctions is required to be in the report if no malfunctions occurred during the reporting period.

(Ref.: 40 CFR 63.11087(e), 63.11088(f), and 63.11095(d), Subpart BBBBBB)

SECTION 6. ALTERNATIVE OPERATING SCENARIOS

6.1 None permitted.

SECTION 7. TITLE VI REQUIREMENTS

The following are applicable or potentially applicable requirements originating from Title VI of the Clean Air Act – Stratospheric Ozone Protection. The full text of the referenced regulations may be found on-line at **http://www.ecfr.gov/** under Title 40, or DEQ shall provide a copy upon request from the permittee.

7.1 If the permittee produces, transforms, destroys, imports or exports a controlled substance or imports or exports a controlled product, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart A – Production and Consumption Controls.

7.2 If the permittee performs service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.

7.3 The permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart E – The Labeling of Products Using Ozone-Depleting Substances, for the following containers and products:

(a) All containers in which a class I or class II substance is stored or transported;

(b) All products containing a class I substance; and

(c) All products directly manufactured with a process that uses a class I substance, unless otherwise exempted by this subpart or, unless EPA determines for a particular product that there are no substitute products or manufacturing processes for such product that do not rely on the use of a class I substance, that reduce overall risk to human health and the environment, and that are currently or potentially available. If the EPA makes such a determination for a particular product, then the requirements of this subpart are effective for such product no later than January 1, 2015.

7.4 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart F – Recycling and Emissions Reduction:

(a) Servicing, maintaining, or repairing appliances;

(b) Disposing of appliances, including small appliances and motor vehicle air conditioners; or

(c) Refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, as well as persons selling, offering for sale, and/or purchasing class I, class II, or non-exempt substitute refrigerants.

7.5 The permittee shall be allowed to switch from any ozone-depleting substance to any acceptable alternative that is listed in the Significant New Alternatives Policy (SNAP) program promulgated pursuant to 40 CFR Part 82, Subpart G – Significant New Alternatives Policy Program. The permittee shall also comply with any use conditions for the acceptable alternative substance.

7.6 If the permittee performs any of the following activities, the permittee shall comply with the applicable requirements of 40 CFR Part 82, Subpart H – Halon Emissions Reduction:

(a) Any person testing, servicing, maintaining, repairing, or disposing of equipment that contains halons or using such equipment during technician training;

(b) Any person disposing of halons;

(c) Manufacturers of halon blends; or

(d) Organizations that employ technicians who service halon-containing equipment.

APPENDIX A

List of Abbreviations Used In this Permit

11 Miss. Admin. Code Pt. 2, Ch. 1.	Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants
11 Miss. Admin. Code Pt. 2, Ch. 2.	Permit Regulations for the Construction and/or Operation of Air Emissions Equipment
11 Miss. Admin. Code Pt. 2, Ch. 3.	Regulations for the Prevention of Air Pollution Emergency Episodes
11 Miss. Admin. Code Pt. 2, Ch. 4.	Ambient Air Quality Standards
11 Miss. Admin. Code Pt. 2, Ch. 5.	Regulations for the Prevention of Significant Deterioration of Air Quality
11 Miss. Admin. Code Pt. 2, Ch. 6.	Air Emissions Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act
11 Miss. Admin. Code Pt. 2, Ch. 7.	Acid Rain Program Permit Regulations for Purposes of Title IV of the Federal Clean Air Act
BACT	Best Available Control Technology
CEM	Continuous Emission Monitor
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COM	Continuous Opacity Monitor
COMS	Continuous Opacity Monitoring System
DEQ	Mississippi Department of Environmental Quality
EPA	United States Environmental Protection Agency
gr/dscf	Grains Per Dry Standard Cubic Foot
HP	Horsepower
HAP	Hazardous Air Pollutant
lbs/hr	Pounds per Hour
M or K	Thousand
MACT	Maximum Achievable Control Technology
MM	Million
MMBTUH	Million British Thermal Units per Hour
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emissions Standards for Hazardous Air Pollutants, 40 CFR 61 or National Emission Standards for Hazardous Air Pollutants for Source Categories, 40 CFR 63
NMVOC	Non-Methane Volatile Organic Compounds
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards, 40 CFR 60
O&M	Operation and Maintenance
PM	Particulate Matter
PM_{10}	Particulate Matter less than 10 μm in diameter
ppm	Parts per Million
PSD	Prevention of Significant Deterioration, 40 CFR 52
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TPY	Tons per Year
TRS	Total Reduced Sulfur
VEE	Visible Emissions Evaluation
VHAP	Volatile Hazardous Air Pollutant
VOC	Volatile Organic Compound

APPENDIX B

List of Regulations Referenced In this Permit

The full text of the regulations referenced in this permit may be found on-line at http://www.deq.state.us **and** http://ecfr.gpoaccess.gov **or the Mississippi Department of Environmental Quality will provide a copy upon request. A list of regulations referenced in this permit is shown below:**

11 Miss. Admin. Code, Part 2, Ch. 1. – Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants (Amended November 10, 2016)

11 Miss. Admin. Code, Part 2, Ch. 2. – Permit Regulations for the Construction and/or Operation of Air Emissions Equipment (Amended July 28, 2005)

11 Miss. Admin. Code, Part 2, Ch. 6. – Air Emission Operating Permit Regulations for the Purposes of Title V of the Federal Clean Air Act (Amended June 28, 2012)

40 CFR 82, Protection of Stratospheric Ozone

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 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals

40 CFR 63, Subpart BBBBBB, NESHAP for Source Category: Gasoline Bulk Terminals, Bulk Plants, and Pipeline Facilities

40 CFR 63, Subpart R – NESHAP for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

APPENDIX C

MONITORING PLAN – STORAGE TANKS

Draft/Proposed

TransMontaigne Collins #2

Monitoring Plan

Storage Tanks
AA-024 through AA-041
(Tank 5925 – Tank 5942)

Draft/Proposed

Section 3, Monitoring and Recordkeeping Condition 6 of the Construction Permit issued June 9, 2017 requires TransMontaigne to submit a Monitoring Plan describing the methods used to monitor the following:

- Throughput of each product
- Maximum true vapor pressure
- Bulk surface temperatures
- Ambient temperature
- Reid vapor Pressure
- Any other site-specific information to show compliance with the VOC emission limits

Regulatory Requirements

Per the Construction Permit issued June 9, 2017, Emission Units AA-024 through AA-041 (Tanks 5925 through 5942) are subject to a VOC emissions limit of 148.6 tons/year on a 12-month rolling basis for normal operations.

These storage tanks are subject to 40 CFR 60 Subpart Kb when storing volatile organic liquids with a vapor pressure of 3.5 kilopascal (0.51 psia) or greater. As required by Subpart Kb, any storage vessel containing a volatile organic liquid with a maximum true vapor pressure equal to or greater than 76.6 kilopascals (11.11 psia) must be equipped with a closed vent system and control device or alternative means of emission limitation.

Emissions Calculations

TransMontaigne utilizes the methods specified in the U.S. EPA Compilation of Emission Factors (AP-42), Fifth Edition, Volume I, Chapter 7: Liquid Storage Tanks to calculate emissions from storage tanks. In order to simplify the administration of these calculations, TransMontaigne utilizes computer software sold by Trinity Consultants called TankESP. TankESP is widely regarded as the most accurate tank emission calculation tool in the market because it was designed by one of the authors of AP-42 Chapter 7.1. It also resolves the technical issues with U.S. EPA TANKS 4.09d and provides additional functionality for non-routine emissions events.

VOC emissions are calculated monthly for the previous month using TankESP based on throughput and individual tank's specific product and RVP for gasoline storage tanks. Monthly emissions are added to the preceding 11 months to calculate the 12-month rolling total VOC emissions. Emissions for Emission Units AA-024 through AA-041 (Tanks 5925 through 5942) are tracked separately to compare against the permit limit of 148.6 tons/year on a 12-month rolling basis for normal operations as well as added to the facility-wide emissions.

Monitoring Plan

Emission Units AA-024 through AA-041 (Tanks 5925 through 5942) are internal floating roof tanks. These tanks store petroleum liquids at ambient pressures and temperatures. In order to calculate emissions using TankESP specific information is required as input.

Product Throughput

Individual storage tank throughput is tracked using an automatic tank gauge (ATG) system and reported as tank receipts monthly. The ATG system records product levels within the tank regularly throughout the month and utilizes tank diameters to provide product volume movements. Because TransMontaigne does not own the petroleum product, our customers audit our inventory management system to verify accuracy.

Maximum True Vapor Pressure

40 CFR 60 Subpart Kb defines maximum true vapor pressure as the equilibrium partial pressure exerted by the volatile organic compound in the stored Volatile Organic Liquid (VOL) at the temperature equal to the local maximum monthly average temperature as reported by the National Weather Service for VOL's stored at the ambient temperature. The maximum monthly average temperature can be determined in accordance with the following methods; methods described in American Petroleum Institute Bulletin 2517 (now MPMS 19.2); obtained from standard reference texts; as determined by ASTM D2879-83, 96 or 97, or; any other method approved by the Administrator. Since VOL stored in these tanks are stored at ambient conditions, TransMontaigne utilizes the monthly maximum average temperature compiled from 30-year averages for the years 1961 through 1990 as published in the National Renewable Energy Lab Redbook. This data is summarized in the American Petroleum Institute's MPMS 19.4 for Jackson, MS as:

Location	Symbol	Units	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Jackson, MS	T_{MAX}	°F	55.6	60.1	69.3	77.4	84.0	90.7	92.5	91.9	88	79.2	69.3	59.5

$$P = \exp\left\{\left[0.7553 - \left(\frac{413.0}{T+459.6}\right)\right] S^{0.5} \log_{10}(RVP) - \left[1.854 - \left(\frac{1{,}042}{T+459.6}\right)\right] S^{0.5}\right.$$

$$\left. + \left[\left(\frac{2{,}416}{T+459.6}\right) - 2.013\right] \log_{10}(RVP) - \left(\frac{8{,}742}{T+459.6}\right) + 15.64\right\}$$

Where:

P = stock true vapor pressure, in pounds per square inch absolute.
T = stock temperature, in degrees Fahrenheit.
RVP = Reid vapor pressure, in pounds per square inch.
S = slope of the ASTM distillation curve at 10 percent evaporated, in degrees Fahrenheit per percent.

Note: This equation was derived from a regression analysis of points read off Figure 7.1-14a over the full range of Reid vapor pressures, slopes of the ASTM distillation curve at 10 percent evaporated, and stock temperatures. In general, the equation yields *P* values that are within +0.05 pound per square inch absolute of the values obtained directly from the nomograph.

TransMontaigne calculates maximum true vapor pressure using the above formula, monthly maximum average temperature as provided above and maximum RVP for each storage tank monthly. This value is compared against 11.11 psia to verify that a closed vent system is not required.

Bulk Surface Temperatures

The TankESP program utilizes Formula 1-28 from AP-42 Chapter 7.1 to calculate the liquid bulk temperature. The daily maximum ambient temperature and daily minimum ambient temperature are provided for Jackson, MS in Table 7.1-7 of AP-42 Chapter 7.1.

Ambient Temperature

As indicated above, the daily maximum ambient temperature and daily minimum ambient temperatures are provided for Jackson, MS in Table 7.1-7 of AP-42 Chapter 7.1.

Reid Vapor Pressure

TransMontaigne obtains gasoline Reid Vapor Pressure using ASTM Method D323. Samples are collected after every pipeline receipt of gasoline into a storage tank. The maximum gasoline RVP is reported monthly and used in TankESP for emissions calculations.

There is no other information required for the emissions calculations by TankESP using AP-42 Chapter 7 calculations.

APPENDIX D

WORK PLAN TO REDUCE EMISSIONS DURING ROOF LANDING EVENTS

TransMontaigne Collins #2

Work Plan to Reduce Emissions During Roof Landing Events

Storage Tanks
AA-024 through AA-041
(Tank 5925 – Tank 5942)

Draft/Proposed

TransMontaigne will periodically have the need to empty storage tanks below the floating roof leg height. When this happens, a vapor space is created between the floating roof deck and liquid level. This situation occurs when emptying a tank for internal inspections and during some product changes with compatible liquids. Additionally, due to seasonal Federal and State restrictions on gasoline Reid Vapor Pressure (RVP), TransMontaigne will periodically need to set the floating roof on legs in order to reduce the volume of higher vapor pressure gasoline prior to introducing lower vapor pressure gasoline. This work plan is being provide to the Mississippi Department of Environmental Quality per Section 3, Monitoring and Recordkeeping Condition 7 of the Construction Permit issued June 9, 2017 to outline TransMontaigne's procedures to reduce short-term emissions during these roof landing events.

Regulatory Requirements

Emission Units AA-024 through AA-041 (Tanks 5925 through 5942) are subject to the requirements of 40 CFR 60 Subpart Kb while storing a volatile organic liquid with a vapor pressure equal to or greater than 3.5 kilopascals (0.508 psia) and 40 CFR 63 Subpart BBBBBB when storing gasoline. 40 CFR 60.112b(a)(1)(i) states: The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. 40 CFR 63.11087(f) states: If your gasoline storage tank is subject to, and complies with, the control requirements of 40 CFR part 60, subpart Kb of this chapter, your storage tank will be deemed in compliance with this section. The operational procedures specified below apply when the storage tanks are storing volatile organic liquids with a vapor pressure of 3.5 kilopascals or greater, including gasoline.

Operational Procedures

In order to minimize short-term emissions TransMontaigne will attempt to only set the floating roofs in Emission Units AA-024 through AA-041 (Tanks 5925 through 5942) on their legs when they tanks are being emptied to be opened or during product changes with compatible liquids or during RVP change season. Any time these tank's roofs are set on legs the refilling with regulated liquids shall be continuous and accomplished as rapidly as possible. Liquid shall be introduced into these tanks at a fill rate to prevent turbulent conditions in order to reduce the volatilization of regulated liquids. For these 18 storage tanks, TransMontaigne will track emissions associated with roof landings on a monthly basis and will not exceed the permit limit of 132.9 lbs of VOC per rolling 12-month period. By following these procedures, TransMontaigne will be reducing emissions generated during roof landing events.