



STATEMENT OF BASIS

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BAQ Engineering Services Division
 2600 Bull Street, Columbia, SC 29201
 Phone: 803-898-4123 Fax: 803-898-4079

Company Name:	TransMontaigne Operating Company LP	Permit Writer:	Alyson Hayes
Permit Number:	CM-0200-0057	Date:	DRAFT

DATE APPLICATION RECEIVED: September 14, 2009
DATE OF LAST INSPECTION: December 15, 2008 (no violations found)

FACILITY DESCRIPTION

This facility owns and operates a petroleum product bulk storage facility. Refined petroleum is received via a pipeline and the product is stored on site in tanks. Tanker trucks are loaded with product from the large storage tanks and then distributed to fuel stations and other facilities throughout the area.

According to the last inspection the facility reportedly ceased storage in 2002 and no product is stored onsite. They are keeping the air permit active for possible future use.

PROJECT DESCRIPTION

The facility has request to renew the Conditional Major operating permit that was issued September 20, 2004 and will expire December 31, 2009.

CHANGES SINCE LAST OP ISSUANCE

The facility had been collocated with 0200-0056 because of common ownership. TransMontaigne no longer owns any part of the other site so it was determined that the facilities are no longer considered collocated.

All the source tanks were put under Unit ID 01 and Unit IDs 02-10 have been listed as VOID.

SOURCE TEST REQUIREMENTS

The facility must test the VRU every four years to demonstrate compliance with the 35 mg/l limit that is used to demonstrate compliance with the VOC and HAP limitations in the permit. Testing will not be required until the facility has returned to high vapor pressure product service. Then the facility will have 180 days after commencing operations to test and will be required to test every four years from that point on.

SPECIAL CONDITIONS, MONITORING, LIMITS

Inspections shall be made on all tanks and records kept of what material is being stored to show compliance with the VOC and HAP emission limitations upon terminal being placed into service.

PUBLIC NOTICE

The permit will require a 30 day public notice.

POTENTIAL EMISSIONS (PROJECT ONLY)

ID	Pollutant	UNCONTROLLED		CONTROLLED	
		lb/hr	TPY	lb/hr	TPY
8301	VOC	2.495434	10.93	N/A	N/A
	Hexane	0.039932	0.1749		
	Benzene	0.022466	0.0984		
	Toluene	0.032443	0.1421		
	224 Trimethylpentane	0.019977	0.0875		
	Xylene	0.012489	0.0547		
	Ethyl Benzene	0.002489	0.0109		
8302	VOC	2.495434	10.93	N/A	N/A
	Hexane	0.039932	0.1749		
	Benzene	0.022466	0.0984		
	Toluene	0.032443	0.1421		
	224 Trimethylpentane	0.019977	0.0875		
	Xylene	0.012489	0.0547		
	Ethyl Benzene	0.002489	0.0109		



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		lb/hr	TPY	lb/hr	TPY
8303	VOC	0.310502	1.36	N/A	N/A
	Hexane	0.016667	0.0730		
	Benzene	0.020662	0.0905		
	Toluene	0.012009	0.0526		
	Cumene	0.000457	0.0020		
	Xylene	0.006781	0.0297		
	Ethyl Benzene	0.001941	0.0085		
8304	VOC	1.589041	6.96	N/A	N/A
	Hexane	0.025411	0.1113		
	Benzene	0.014292	0.0626		
	Toluene	0.020639	0.0904		
	224 Trimethylpentane	0.012717	0.0557		
	Xylene	0.007945	0.0348		
	Ethyl Benzene	0.001598	0.0070		
8305	VOC	0.173516	0.76	N/A	N/A
	Hexane	0.009338	0.0409		
	Benzene	0.011575	0.0507		
	Toluene	0.006735	0.0295		
	Cumene	0.000251	0.0011		
	Xylene	0.00379	0.0166		
	Ethyl Benzene	0.001096	0.0048		
8306	VOC	1.589041	6.96	N/A	N/A
	Hexane	0.085616	0.3750		
	Benzene	0.106119	0.4648		
	Toluene	0.061644	0.2700		
	Cumene	0.002374	0.0104		
	Xylene	0.034795	0.1524		
	Ethyl Benzene	0.01	0.0438		
8307	VOC	0.401826	1.76	N/A	N/A
	Hexane	0.006416	0.0281		
	Benzene	0.003607	0.0158		
	Toluene	0.005205	0.0228		
	224 Trimethylpentane	0.003219	0.0141		
	Xylene	0.002009	0.0088		
	Ethyl Benzene	0.000411	0.0018		
8308	VOC	0.744292	3.26	N/A	N/A
	Hexane	0.011918	0.0522		
	Benzene	0.006712	0.0294		
	Toluene	0.00968	0.0424		
	Cumene	0.005959	0.0261		
	Xylene	0.003721	0.0163		
	Ethyl Benzene	0.000753	0.0033		



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ID	Pollutant	UNCONTROLLED		CONTROLLED	
		lb/hr	TPY	lb/hr	TPY
8309	VOC	0.454338	1.99	N/A	N/A
	Hexane	0.00726	0.0318		
	Benzene	0.004087	0.0179		
	Toluene	0.005913	0.0259		
	Cumene	0.00363	0.0159		
	Xylene	0.00226	0.0099		
	Ethyl Benzene	0.000457	0.0020		
8311	VOC	3.812785	16.70	N/A	N/A
	Hexane	0.061005	0.2672		
	Benzene	0.034315	0.1503		
	Toluene	0.049566	0.2171		
	Cumene	0.030502	0.1336		
	Xylene	0.019064	0.0835		
	Ethyl Benzene	0.003813	0.0167		
Loading Rack Gasoline – 100,000,000 gal/yr	VOC	193.8	849	3.333333	14.60
	Hexane	3.10	13.57	0.053333	0.2336
	Benzene	1.73	7.556	0.03	0.1314
	Toluene	2.52	11.037	0.043333	0.1898
	Ethyl Benzene	0.19	0.849	0.003333	0.0146
	224 Trimethylpentane	---	---	0.026667	0.1168
	Xylene	0.97	4.245	0.016667	0.0730
Loading Rack Distillate – 300,000,000 gal/yr	VOC	The uncontrolled emissions listed for gasoline are worst case emissions		0.027397	0.12
	Hexane			0.001438	0.0063
	Benzene			0.001758	0.0077
	Toluene			0.001027	0.0045
	Ethyl Benzene			0.00016	0.0007
	Xylene			0.000571	0.0025
	Cumene			4.57E-05	0.0002
Fugitives and Transit Losses	VOC	1.247	5.46	N/A	N/A
	Hexane	0.020	0.0874		
	Benzene	0.011	0.0492		
	Toluene	0.016	0.0710		
	Ethyl Benzene	0.001	0.0055		
	224 Trimethylpentane	0.010	0.0437		
	Xylene	0.006	0.0273		

Storage Tanks emissions are based on TANKS 4.0.9d

Controlled emissions for loading rack are based on emission factors of 35 mg/l for gasoline (based on manufacturers guarantee) and 0.093 mg/l for distillate (based on AP-42 Section 5.2).

Gasoline HAP emissions based on factors from *Hazardous Air Pollutant Emissions from Gasoline Loading Operations at Bulk Gasoline Terminals*, API Publication No. 347, Table 5-2 October 1998.

Distillate HAP emissions based on factors extracted from *Compilation of Air Emission Factors for Petroleum Distribution and Retail Marketing Facilities*, September 1995.

Transit Losses based on AP-42, Section 5.2, Table 5.2-5, Return with vapor, Typical transported 13.0 mg/l.

FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled Emissions
	TPY	TPY



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FACILITY WIDE EMISSIONS		
Pollutant	Uncontrolled Emissions	Controlled Emissions
	TPY	TPY
VOC	916.07	81.79
Hexane	15.0	1.7
Benzene	8.7	1.3
Toluene	12.1	1.3
Ethyl Benzene	0.96	0.13
224 Trimethylpentane	0.29	0.4
Xylene	4.7	0.56
Cumene	0.19	0.19

PROJECT REGULATORY APPLICABILITY REVIEW (PROJECT ONLY)			
Regulation	Applicable		Comments
	Yes	No	
South Carolina Regulation 61-62.1 through 62.70: Air Pollution Regulations			
OPERATING PERMIT STATUS			
Section II(G) - Conditional Major	X		The facility is a major source of VOC and HAP emissions; however, they have taken limits on the amount of gasoline and distillate that can be loaded at the site to limit these emissions below Title V thresholds.
Regulation 61-62.70 - Title V		X	
MODELING			
Standard 2 - Ambient Air Quality Standards		X	This facility has demonstrated compliance through modeling for all TAPs; see modeling summary dated 4/30/96
Standard 7(c) - Ambient Air Increments		X	
Standard 8 - Toxic Air Pollutants (state only)	X		
OTHERS			
Section II(E) - Synthetic Minor		X	No synthetic minor limits in place. The facility has conditional major limits.
Standard 1 - Fuel Burning Operations		X	No fuel burning sources at the facility.
Standard 3 - Waste Combustion/Reduction (state only)		X	No sources of waste combustion at the facility.
Standard 3.1 - HMI Waste Incinerators		X	The facility does not burn any medical waste.
Standard 4 - Emissions from Process Industries	X		The storage tanks and loading racks have opacity limits.
Standard 5 - Volatile Organic Compounds		X	Sources in Anderson County are exempt from this regulation.
Standard 5.1 - BACT/LAER For VOC (state only)		X	As stated in a letter from the company dated February 24, 1998 the baseline emissions for the facility were 233.37 tons per year of VOC.
Standard 5.2 - Control of Oxides of Nitrogen		X	No combustion sources.
Standard 7 - Prevention of Significant Deterioration		X	The facility has federally enforceable limits under the Conditional Major permit that establish VOC emissions of less than 100 TPY.
Standard 7.1 - Standards for Non Attainment Areas		X	Anderson County is in attainment
62.6 - Control of Fugitive Particulate Matter		X	No fugitive PM emissions
62.60 - SC Designated Facility Plan and NSPS		X	See below
62.61 - NESHAP		X	See below
62.63 - NESHAP For Source Categories		X	See below
62.68 - Chemical Accident Prevention		X	No chemicals stored above thresholds.
Federal Regulations			



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PROJECT REGULATORY APPLICABILITY REVIEW (PROJECT ONLY)

Regulation	Applicable		Comments
	Yes	No	
40CFR60 Subpart		X	K, Ka, Kb are not applicable because the tanks were all constructed prior to 1973. XX is not applicable because the loading rack as installed prior to applicability date of the NSPS. When the new VRU was installed in 1996 it was not considered a modification (emissions decreased) and it was not considered reconstruction (because cost was compared to new VRU and new loading rack).
40CFR61 Subpart		X	Does not have any of these sources.
40CFR63 Subpart		X	Not major source of HAP emissions.
Area Source Standards (Part 63) Subpart BBBB	X		The facility is an existing source and must be in compliance by January 10, 2011 or upon the facility becoming operational, whichever is later.
Compliance Assurance Monitoring (CAM) (Part 64)		X	Not Title V facility.

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.

