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TRANSMONTAIGNE

November 15, 2023

Sent via UPS Tracking #: 1Z 1V0 21V 02 9206 3546

Mr. Dylan Sears
Kentucky Department for Environmental Protection
Division of Air Quality
300 Sower Boulevard
Frankfort, KY 40601

Re: *TransMontaigne Operating Company, L.P. – Covington Terminal*
Title V Operating Permit V-17-033
Permit Renewal-Conditional Major

Dear Mr. Sears,

TransMontaigne Operating Company, L.P. (TransMontaigne) owns and operates the Covington Terminal located in Covington, Kentucky. The Covington Terminal operates under authority of Title V Operating Permit V-17-033. A Title V Operating Permit renewal application was submitted to the Kentucky Department for Environmental Protection (KDEP) on December 8, 2022.

As discussed with KDEP, TransMontaigne requests that the Covington Terminal operate under a Conditional Major Operating Permit. Please find enclosed the Conditional Major permit application. TransMontaigne kindly requests a copy of the draft permit for review and possible comment prior to issuance of the final Conditional Major Operating Permit.

If you have any questions or need any further information during the processing of this permit application, please call me at (303) 860-5128.

Sincerely,

TRANSMONTAIGNE OPERATING COMPANY, L.P.

Dirk L. Wold

Dirk Wold
Air Quality Compliance Manager

1670 Broadway • Suite 3100 • Denver, CO 80202 • 303-626-8200 (phone) • 303-626-8228 (fax)
Mailing Address: P.O. Box 5660 • Denver, CO 80217-5660
www.transmontaigne.com

CONTENTS

Introduction

TransMontaigne Operating Company, L.P. (TransMontaigne) owns and operates the Covington Terminal located near Covington, Kentucky. The Covington Terminal is operating under Title V Operating Permit Number V-17-033.

Facility Description

The Covington Terminal is a bulk petroleum products storage facility. During current operations, petroleum products enter the terminal via trucks. The facility also has the capability for petroleum products to enter the terminal via barges. The petroleum products are stored in tanks at the facility and then transferred by tank trucks to service stations and other receiving facilities. Petroleum products could be transferred out by barge as well. The terminal has sixteen (16) storage tanks and two (2) loading racks associated with the operation of the facility. Emissions of volatile organic compounds (VOC) and hazardous air pollutants (HAPs) are generated from the storage tanks and from the loading racks.

Emission Units

TransMontaigne is requesting the emission units and requested emission limits contained in this permit application be authorized by a Conditional Major Permit. The emissions units include seven (7) storage tanks that are permitted, nine (9) storage tanks that are categorized as insignificant activities and do not need to be permitted, two (2) loading racks, barge loading, fugitive sources of emissions, and emissions from cargo leaks. The seven (7) permitted tanks have emissions estimated with gasoline as the product in the tank and the nine (9) storage tanks below the permitting threshold have emissions estimated with distillate as the product. For the permitted tanks, TransMontaigne requests the flexibility to use gasoline or any lower vapor pressure product in the storage tanks. The requested emissions totals can be found for each emission unit in the emissions summary spreadsheet. The requested emissions limits for storage tanks come from the TankESP emissions prediction model which contains tank information and throughput information and reports from the model and use EPA AP-42 emissions factors. There is currently no vapor combustion unit (VCU) at the facility. A VCU has been included in the emissions calculations at the loading rack for gasoline. The facility does not currently store gasoline. TransMontaigne requests the ability to store this product in the future and will install a VCU at that time.

Regulatory Applicability

The Covington Terminal does not currently store gasoline. Therefore, 40 CFR Part 63, Subpart BBBBBB and 40 CFR, Part 60, Subpart XX do not apply. If in the future, TransMontaigne does store gasoline, the required notifications, recording, and reporting will be conducted during the required timeframe. TransMontaigne would like to retain the current permit language relating to these regulations and the current flexibility listed in the air permit. The Kentucky DEQ form DEP7007V lists the regulatory requirement for the regulations listed above.

Division for Air Quality

300 Sower Boulevard

Frankfort, KY 40601

(502) 564-3999

DEP7007AI

Administrative Information

___ Section AI.1: Source Information

___ Section AI.2: Applicant Information

___ Section AI.3: Owner Information

___ Section AI.4: Type of Application

___ Section AI.5: Other Required Information

___ Section AI.6: Signature Block

___ Section AI.7: Notes, Comments, and Explanations

Additional Documentation

___ Additional Documentation attached

Source Name: TransMontaigne Operating Company, L.P. - Covington Terminal

KY EIS (AFS) #: 21- 117-00004

Permit #: V-17-033

Agency Interest (AI) ID: 2504

Date: 11/10/2023

Section AI.1: Source Information

Physical Location Address:	**Street:**	700 River Road, Highway 8				
	City:	Covington	**County:**	Kenton	**Zip Code:**	41017
Mailing Address:	**Street or P.O. Box:**	1670 Broadway, Suite 3100				
	City:	Denver	**State:**	CO	**Zip Code:**	80202

Standard Coordinates for Source Physical Location

Longitude: 84.587022 (decimal degrees) **Latitude:** 39.073722 (decimal degrees)

Primary (NAICS) Category: _____ **Primary NAICS #:** _____

Classification (SIC) Category: 42 **Primary SIC #:** 4226

Briefly discuss the type of business conducted at this site: Bulk Petroleum Products Storage Facility

Description of Area Surrounding Source: ☐ Rural Area ☐ Industrial Park ☐ Residential Area ☐ Urban Area ☐ Industrial Area ☑ Commercial Area

Is any part of the source located on federal land? ☐ Yes ☑ No

Number of Employees: 6

Approximate distance to nearest residence or commercial property: _____ **Property Area:** _____ **Is this source portable?** ☐ Yes ☑ No

What other environmental permits or registrations does this source currently hold or need to obtain in Kentucky?

NPDES/KPDES:	☑ Currently Hold	☐ Need	☐ N/A
Solid Waste:	☐ Currently Hold	☐ Need	☑ N/A
RCRA:	☑ Currently Hold	☐ Need	☐ N/A
UST:	☐ Currently Hold	☐ Need	☑ N/A

Type of Regulated Waste Activity: ☐ Mixed Waste Generator ☐ Generator ☐ Recycler ☐ Other: _____ ☐ U.S. Importer of Hazardous Waste ☐ Transporter ☐ Treatment/Storage/Disposal Facility ☐ N/A

Section AI.2: Applicant Information

Applicant Name: TransMontaigne Operating Company, L.P.

Title: (if individual)

Mailing Address: **Street or P.O. Box:** 1670 Broadway, Suite 3100
City: Denver **State:** CO **Zip Code:** 80202

Email: (if individual)

Phone:

Technical Contact

Name: Dirk Wold

Title: Air Quality Compliance Manager

Mailing Address: **Street or P.O. Box:** 1670 Broadway, Suite 3100
City: Denver **State:** CO **Zip Code:** 80202

Email: Dwold@TransMontaigne.com

Phone: 303-860-5128

Air Permit Contact for Source

Name: Same as Technical Contact or Garrett Clemons

Title: Consultant

Mailing Address: **Street or P.O. Box:** 1670 Broadway, Suite 3100
City: Denver **State:** CO **Zip Code:** 80202

Email: gclemons78@yahoo.com

Phone:

Section AI.3: Owner Information

☑ **Owner same as applicant**

Name:

Title:

Mailing Address: **Street or P.O. Box:**

City: **State:** **Zip Code:**

Email:

Phone:

List names of owners and officers of the company who have an interest in the company of 5% or more.

Name	Position
TransMontaigne Partners, L.P.	100%

Section AI.4: Type of Application

Current Status: ☑ Title V ☐ Conditional Major ☐ State-Origin ☐ General Permit ☐ Registration ☐ None

Requested Action: *(check all that apply)*

☐ Name Change	☐ Initial Registration	☐ Significant Revision	☐ Administrative Permit Amendment
☑ Renewal Permit	☐ Revised Registration	☐ Minor Revision	☐ Initial Source-wide OperatingPermit
☐ 502(b)(10)Change	☐ Extension Request	☐ Addition of New Facility	☐ Portable Plant Relocation Notice
☐ Revision	☐ Off Permit Change	☐ Landfill Alternate Compliance Submittal	☐ Modification of Existing Facilities
☐ Ownership Change	☐ Closure		

Requested Status: ☐ Title V ☑ Conditional Major ☐ State-Origin ☐ PSD ☐ NSR ☐ Other: _____

Is the source requesting a limitation of potential emissions? ☑ Yes ☐ No

Pollutant:	Requested Limit:	Pollutant:	Requested Limit:
☐ Particulate Matter		☑ Single HAP	< 10 tons
☑ Volatile Organic Compounds (VOC)	92.16 tons	☑ Combined HAPs	< 25 tons
☑ Carbon Monoxide	11.48 tons	☐ Air Toxics (40 CFR 68, Subpart F)	
☑ Nitrogen Oxides	4.59 tons	☐ Carbon Dioxide	
☐ Sulfur Dioxide		☐ Greenhouse Gases (GHG)	
☐ Lead		☐ Other	

For New Construction:

Proposed Start Date of Construction: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

For Modifications:

Proposed Start Date of Modification: *(MM/YYYY)* _____ **Proposed Operation Start-Up Date:** *(MM/YYYY)* _____

Applicant is seeking coverage under a permit shield. ☑ Yes ☐ No

Identify any non-applicable requirements for which permit shield is sought on a separate attachment to the application.

Section AI.5 Other Required Information

Indicate the documents attached as part of this application:

- ☐ DEP7007A Indirect Heat Exchangers and Turbines
- ☑ DEP7007B Manufacturing or Processing Operations
- ☐ DEP7007C Incinerators and Waste Burners
- ☐ DEP7007F Episode Standby Plan
- ☐ DEP7007J Volatile Liquid Storage
- ☐ DEP7007K Surface Coating or Printing Operations
- ☐ DEP7007L Mineral Processes
- ☐ DEP7007M Metal Cleaning Degreasers
- ☑ DEP7007N Source Emissions Profile
- ☐ DEP7007P Perchloroethylene Dry Cleaning Systems
- ☐ DEP7007R Emission Offset Credit
- ☐ DEP7007S Service Stations
- ☐ DEP7007T Metal Plating and Surface Treatment Operations
- ☑ DEP7007V Applicable Requirements and Compliance Activities
- ☐ DEP7007Y Good Engineering Practice and Stack Height Determination
- ☐ DEP7007AA Compliance Schedule for Non-complying Emission Units
- ☐ DEP7007BB Certified Progress Report
- ☐ DEP7007CC Compliance Certification
- ☐ DEP7007DD Insignificant Activities
- ☐ DEP7007EE Internal Combustion Engines
- ☐ DEP7007FF Secondary Aluminum Processing
- ☐ DEP7007GG Control Equipment
- ☐ DEP7007HH Haul Roads
- ☐ Confidentiality Claim
- ☐ Ownership Change Form
- ☐ Secretary of State Certificate
- ☐ Flowcharts or diagrams depicting process
- ☐ Digital Line Graphs (DLG) files of buldings, roads, etc.
- ☑ Site Map
- ☑ Map or drawing depicting location of facility
- ☐ Safety Data Sheet (SDS)
- ☐ Emergency Response Plan
- ☐ Other: _____

Section AI.6: Signature Block

I, the undersigned, hereby certify under penalty of law, that I am a responsible official*, and that I have personally examined, and am familiar with, the information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the information is on knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false or incomplete information, including the possibility of fine or imprisonment.

Authorized Signature

11/16/2023

Date

Matthew Kolata

Type or Printed Name of Signatory

V.P. of ESOH

Title of Signatory

*Responsible official as defined by 401 KAR 52:001.

Section AI.7: Notes, Comments, and Explanations

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007B

Manufacturing or Processing Operations

___ Section B.1: Process Information
___ Section B.2: Materials and Fuel Information
___ Section B.3: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI, DEP7007N, DEP7007V, and DEP7007GG.
___ Attach a flow diagram
___ Attach SDS

Source Name: TransMontaigne Operating Company, L.P.-Covington Terminal
KY EIS (AFS) #: 21- 117-00004
Permit #: V-17-033
Agency Interest (AI) ID: 2504
Date: 11/10/2023

Section B.1: Process Information

Emission Unit #	Emission Unit Name	Describe Emission Unit	Process ID	Process Name	Manufacturer	Model No.	Proposed/Actual Date of Construction Commencement *(MM/YYYY)*	Is the Process Continuous or Batch?	Number of Batches per 24 Hours *(if applicable)*	Hours per Batch *(if applicable)*
01 (LR-1)	Truck Loading	Truck Loading Rack		Loading Rack			N/A	N/A		
01 (LR-2)	Truck Loading	Truck Loading Rack		Loading Rack			N/A	N/A		
013	Fugitive Emissions	Fugitive Emissions From Equipment Leaks					N/A	N/A		
	Fugitive Emissions	Furgitive Emissions From Cargo Leaks					N/A	N/A		
002 (T-1)	Tank 1	Storage Tank-EFR		Storage Tank			N/A	N/A		
002 (T-2)	Tank 2	Storage Tank-EFR		Storage Tank			N/A	N/A		
002 (T-3)	Tank 3	Storage Tank-EFR		Storage Tank			N/A	N/A		
002 (T-4)	Tank 4	Storage Tank-EFR		Storage Tank			N/A	N/A		
002 (T-5)	Tank 5	Storage Tank-EFR		Storage Tank			N/A	N/A		
002 (T-6)	Tank 6	Storage Tank-EFR		Storage Tank			N/A	N/A		
002 (T-7)	Tank 7	Storage Tank-EFR		Storage Tank			N/A	N/A		

Section B.2: Materials and Fuel Information

**Maximum yearly fuel usage rate only applies if applicant request operating restrictions through federally enforceable limitations.*

Emission Unit #	Emission Unit Name	Name of Raw Materials Input	Maximum Quantity of Each Raw Material Input	(Specify Units/hr)	Total Process Weight Rate for Emission Unit (tons/hr)	Name of Finished Materials	Maximum Quantity of Each Finished Material Output	(Specify Units/hr)	Fuel Type	Maximum Hourly Fuel Usage Rate	(Specify Units)	Maximum Yearly Fuel Usage Rate	(Specify Units)	Sulfur Content (%)	Ash Content (%)
01 (LR-1)	Truck Loading	Gasoline										275,000,000 gal/yr			
01 (LR-2)	Truck Loading	Gasoline										275,000,000 gal/yr			
013	Fugitive Emissions	Gasoline										275,000,000 gal/yr			
	Fugitive Emissions	Gasoline										275,000,000 gal/yr			
002 (T-1)	Tank 1	Gasoline										73,725,294 gal/yr			
002 (T-2)	Tank 2	Gasoline										73,725,294 gal/yr			
002 (T-3)	Tank 3	Gasoline										25,509,882 gal/yr			
002 (T-4)	Tank 4	Gasoline										25,509,882 gal/yr			
002 (T-5)	Tank 5	Gasoline										25,509,882 gal/yr			
002 (T-6)	Tank 6	Gasoline										25,509,882 gal/yr			
002 (T-7)	Tank 7	Gasoline										25,509,882 gal/yr			

Section B.3: Notes, Comments, and Explanations

TransMontaigne requests that gasoline storage tanks be grouped as "Gasoline Storage Tanks" with a combined total gasoline throughput of 275,000,000 per year. Grouping will allow for operational flexability.

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007N

Source Emissions Profile

__ Section N.1: Emission Summary
__ Section N.2: Stack Information
__ Section N.3: Fugitive Information
__ Section N.4: Notes, Comments, and Explanations

Additional Documentation

__ Complete DEP7007AI

Source Name: TransMontaigne Operating Company, L.P. - Covington Terminal
KY EIS (AFS) #: 21- 117-00004
Permit #: V-17-033
Agency Interest (AI) ID: 2504
Date: 11/10/2023

N.1: Emission Summary

Emission Unit #	Emission Unit Name	Process ID	Process Name	Control Device Name	Control Device ID	Stack ID	Maximum Design Capacity (SCC Units/hour)	Pollutant	Uncontrolled Emission Factor (lb/SCC Units)	Emission Factor Source (e.g. AP-42, Stack Test, Mass Balance)	Capture Efficiency (%)	Control Efficiency (%)	Hourly Emissions		Annual Emissions	
													Uncontrolled Potential (lb/hr)	Controlled Potential (lb/hr)	Uncontrolled Potential (tons/yr)	Controlled Potential (tons/yr)
LR-1	Loading Rack	LR-1	Loading Rack	VCU	VCU	VCU		VOC, HAPs		AP-42		35 ng/l				46.66
FUG-1	Fugitives	FUG-1	Fugitives	N/A	N/A	N/A		VOC, HAPs	N/A	AP-42	N/A	N/A				0.47
CL	Cargo Leads	CL	Cargo Leads	N/A	N/A	N/A		VOC, HAPs	N/A	AP-42	N/A	N/A				14.92
T-1	Tank T-1	T-1	Tank T-1	EFR	EFR	N/A		VOC, HAPs	N/A	TankESP	N/A	N/A				4.65
T-2	Tank T-2	T-2	Tank T-2	EFR	EFR	N/A		VOC, HAPs	N/A	TankESP	N/A	N/A				4.65
T-3	Tank T-3	T-3	Tank T-3	EFR	EFR	N/A		VOC, HAPs	N/A	TankESP	N/A	N/A				3.67
T-4	Tank T-4	T-4	Tank T-4	EFR	EFR	N/A		VOC, HAPs	N/A	TankESP	N/A	N/A				3.67
T-5	Tank T-5	T-5	Tank T-5	EFR	EFR	N/A		VOC, HAPs	N/A	TankESP	N/A	N/A				3.67
T-6	Tank T-6	T-6	Tank T-6	EFR	EFR	N/A		VOC, HAPs	N/A	TankESP	N/A	N/A				3.67
T-7	Tank T-7	T-7	Tank T-7	EFR	EFR	N/A		VOC, HAPs	N/A	TankESP	N/A	N/A				3.67

Section N.2: Stack Information

UTM Zone:

Stack ID	Identify all Emission Units (with Process ID) and Control Devices that Feed to Stack	Stack Physical Data			Stack UTM Coordinates		Stack Gas Stream Data		
		Equivalent Diameter *(ft)*	Height *(ft)*	Base Elevation *(ft)*	Northing *(m)*	Easting *(m)*	Flowrate *(acfm)*	Temperature *(°F)*	Exit Velocity *(ft/sec)*
VCU	Loading Rack - Permitted but not installed								

Section N.3: Fugitive Information

UTM Zone:

Emission Unit #	Emission Unit Name	Process ID	Area Physical Data		Area UTM Coordinates		Area Release Data	
			Length of the X Side *(ft)*	Length of the Y Side *(ft)*	Northing *(m)*	Easting *(m)*	Release Temperature *(°F)*	Release Height *(ft)*
FUG-1	Fugitive Emissions from Equipment Leaks	FUG-1	1050	360	4327.3	708.6	Ambient	Various

Section N.4: Notes, Comments, and Explanations

Division for Air Quality

300 Sower Boulevard
Frankfort, KY 40601
(502) 564-3999

DEP7007V

Applicable Requirements and Compliance Activities

___ Section V.1: Emission and Operating Limitation(s)
___ Section V.2: Monitoring Requirements
___ Section V.3: Recordkeeping Requirements
___ Section V.4: Reporting Requirements
___ Section V.5: Testing Requirements
___ Section V.6: Notes, Comments, and Explanations

Additional Documentation

___ Complete DEP7007AI

Source Name: TransMontaigne Operating Company, L.P. - Covington Terminal
KY EIS (AFS) #: 21- 117-00004
Permit #: V-17-033
Agency Interest (AI) ID: 2504
Date: 11/10/2023

Section V.1: Emission and Operating Limitation(s)

Emission Unit #	Emission Unit Description	Applicable Regulation or Requirement	Pollutant	Emission Limit (if applicable)	Voluntary Emission Limit or Exemption (if applicable)	Operating Requirement or Limitation (if applicable)	Method of Determining Compliance with the Emission and Operating Requirement(s)
002 (T-1)	Tank with EFR	BBBBBB, XX	VOC, HAPs				Calculations, Mainteance
002 (T-2)	Tank with EFR	BBBBBB, XX	VOC, HAPs				Calculations, Mainteance
002 (T-3)	Tank with EFR	BBBBBB, XX	VOC, HAPs				Calculations, Mainteance
002 (T-4)	Tank with EFR	BBBBBB, XX	VOC, HAPs				Calculations, Mainteance
002 (T-5)	Tank with EFR	BBBBBB, XX	VOC, HAPs				Calculations, Mainteance
002 (T-6)	Tank with EFR	BBBBBB, XX	VOC, HAPs				Calculations, Mainteance
002 (T-7)	Tank with EFR	BBBBBB, XX	VOC, HAPs				Calculations, Mainteance
01 (LR-1)	Loading Rack	XX	VOC, HAPs				Calculations, Testing
01 (LR-2)	Loading Rack	XX	VOC, HAPs				Calculations, Testing

Section V.2: Monitoring Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Monitored	Description of Monitoring
002 (T-1)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-2)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-3)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-4)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-5)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-6)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-7)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
01 (LR-1)	Loading Rack	VOC, HAPs	40 CFR 60, Subpart XX	Testing, Inspections	Compliance Testing, Vapor Tight Tanks, Emissions Calculations, and Other Requirements
01 (LR-2)	Loading Rack	VOC, HAPs	40 CFR 60, Subpart XX	Testing, Inspections	Compliance Testing, Vapor Tight Tanks, Emissions Calculations, and Other Requirements

Section V.3: Recordkeeping Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Recorded	Description of Recordkeeping
002 (T-1)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-2)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-3)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-4)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-5)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-6)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
002 (T-7)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank inspections	Tank inspections, Tank Records, and Other Requirements
01 (LR-1)	Loading Rack	VOC, HAPs	40 CFR 60, Subpart XX	Emissions, Testing	Emissions Calculations, Testing Results, Leaking Testing, Monitoring Data, and Other Requirements
01 (LR-2)	Loading Rack	VOC, HAPs	40 CFR 60, Subpart XX	Emissions, Testing	Emissions Calculations, Testing Results, Leaking Testing, Monitoring Data, and Other Requirements

Section V.4: Reporting Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Reported	Description of Reporting
002 (T-1)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank Inspections	Semi-annual Reports, Compliance Status, Permit Reports
002 (T-2)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank Inspections	Semi-annual Reports, Compliance Status, Permit Reports
002 (T-3)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank Inspections	Semi-annual Reports, Compliance Status, Permit Reports
002 (T-4)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank Inspections	Semi-annual Reports, Compliance Status, Permit Reports
002 (T-5)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank Inspections	Semi-annual Reports, Compliance Status, Permit Reports
002 (T-6)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank Inspections	Semi-annual Reports, Compliance Status, Permit Reports
002 (T-7)	Tank with EFR	VOC, HAPs	40 CFR 63, Subpart BBBBBB	Tank Inspections	Semi-annual Reports, Compliance Status, Permit Reports
01 (LR-1)	Loading Rack	VOC, HAPs	40 CFR 60, Subpart XX	Inspections, Testing	Testing Results, Leak Testing Results, Semi-annual Reports., Compliance Status, Permit Reports
01 (LR-2)	Loading Rack	VOC, HAPs	40 CFR 60, Subpart XX	Inspections, Testing	Testing Results, Leak Testing Results, Semi-annual Reports., Compliance Status, Permit Reports

Section V.5: Testing Requirements

Emission Unit #	Emission Unit Description	Pollutant	Applicable Regulation or Requirement	Parameter Tested	Description of Testing
01 (LR-1)	Loading Rack	VOC, HAPs	40 CFR 60, Subpart XX	Compliance Testing	Emissions Testing of the VCU, Leak Testing of Tank Trucks
01 (LR-2)	Loading Rack	VOC, HAPs	40 CFR 60, Subpart XX	Compliance Testing	Emissions Testing of the VCU, Leak Testing of Tank Trucks

Section V.6: Notes, Comments, and Explanations

Plot Plan and Map

FACILITY DIAGRAM

FIGURE 1-6

NOTE: TANK CONTENTS & CAPACITIES, AS WELL AS SECONDARY CONTAINMENT VOLUMES ARE LISTED IN THE TANKAGE TABLE IN APPENDIX D (FIGURE D-1)

THIS FACILITY CONTAINS NO UNDERGROUND STORAGE TANKS, SURFACE IMPOUNDMENTS, OR DRUM STORAGE AREAS.

SW = SATELLITE WASTE ACCUMULATION AREA

No.	REVISION DESCRIPTION	DATE	DWN	CHK
1	REVISED PER ESOH	8/03	RSB	
2	REVISED PER ESOH	11/05	RSB	
3	REVISED BY ESOH	12/06	AJM	

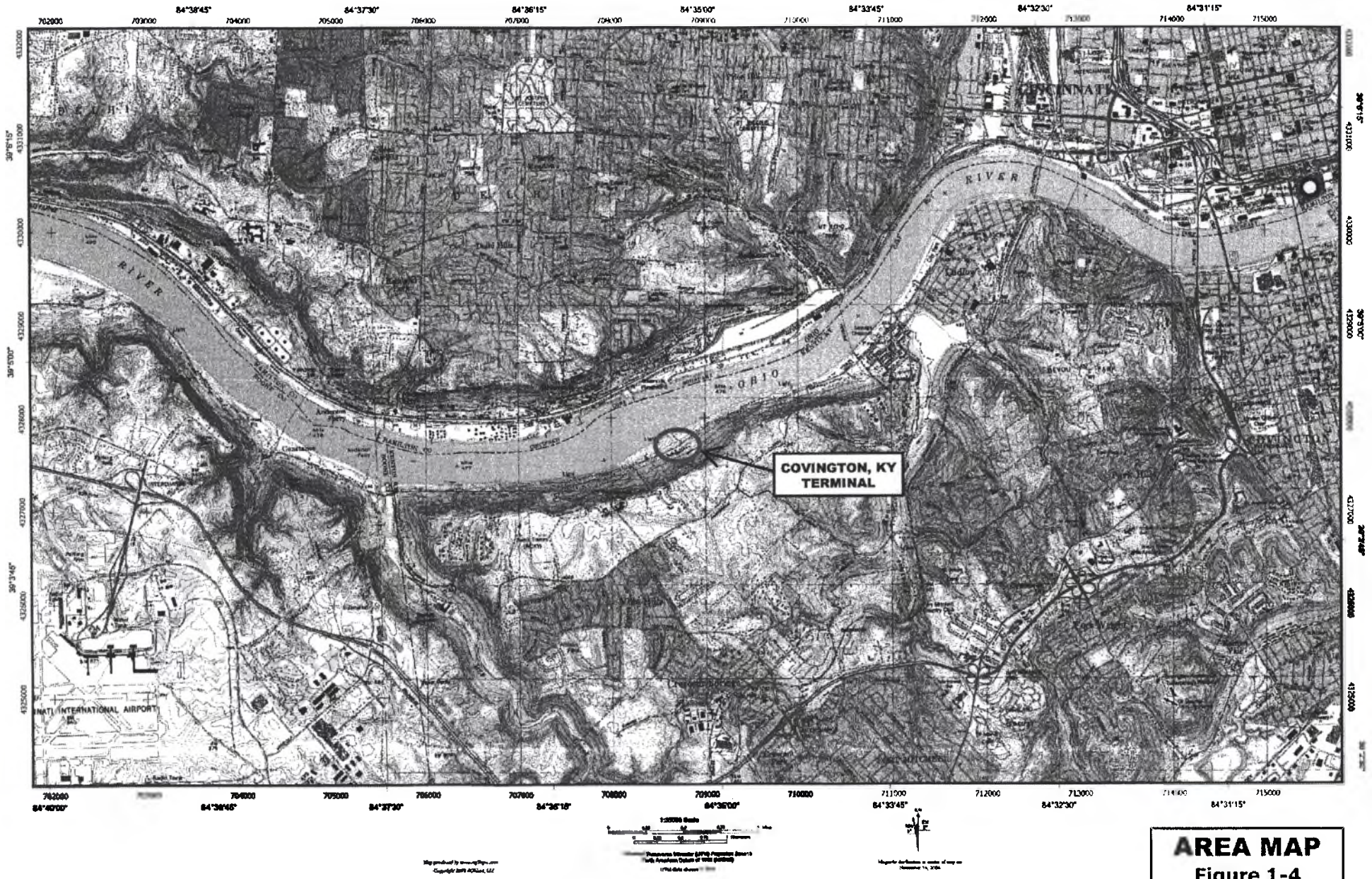
TRANSMONTAIGNE INC.

SCALE: NOTED
DRAWN: S.STANFIELD
CHECK:
APPROVALS

COVINGTON TERMINAL

COVINGTON, KENTUCKY

SIZE | PLANT | DRAWING NUMBER: GCG00100 | REV: 3



AREA MAP
Figure 1-4

Emissions Calculations

TransMontaigne is including an emissions summary spreadsheet of the requested emissions limits for this Conditional Major Operating Permit.

TRANSMONTAIGNE TERMINALING INC.

FACILITY NAME: Covington

ANNUAL POTENTIAL TO EMIT SUMMARY SHEET

EQUIPMENT NAME/NO.	EQUIPMENT SPECIFICATIONS				ANNUAL EMISSIONS (ton/yr)									
	DIMENSIONS H X D (ft)	CAPACITY (bbl)	ROOF TYPE	PRODUCT	TANKS 4.09 TOTAL VOC	TOTAL HAPs	Hexane	Benzene	Toluene	Ethyl-benzene	Iso-Octane	Xylene	Cumene	MTBE
1	48 x 68	31,048	XFR	Gasoline	4.65	0.24	0.0743	0.0418	0.0604	0.0046	0.0372	0.0232	na	na
2	48 x 68	31,048	XFR	Gasoline	4.65	0.24	0.0743	0.0418	0.0604	0.0046	0.0372	0.0232	na	na
3	48 x 40	10,743	XFR	Gasoline	3.67	0.19	0.0587	0.0330	0.0477	0.0037	0.0293	0.0183	na	na
4	48 x 40	10,743	XFR	Gasoline	3.67	0.19	0.0587	0.0330	0.0477	0.0037	0.0293	0.0183	na	na
5	48 x 40	10,743	XFR	Gasoline	3.67	0.19	0.0587	0.0330	0.0477	0.0037	0.0293	0.0183	na	na
6	48 x 40	10,743	XFR	Gasoline	3.67	0.19	0.0587	0.0330	0.0477	0.0037	0.0293	0.0183	na	na
7	48 x 40	10,743	XFR	Gasoline	3.67	0.19	0.0587	0.0330	0.0477	0.0037	0.0293	0.0183	na	na
8	48 x 40	10,743	CR	Distillate	0.32	0.06	0.0175	0.0216	0.0126	0.0020	na	0.0071	0.0005	na
9	48 x 40	10,743	CR	Distillate	0.30	0.06	0.0161	0.0200	0.0116	0.0019	na	0.0065	0.0004	na
10	17-9 x 10-6	274	CR	Distillate	0.01	0.00	0.0004	0.0005	0.0003	0.0000	na	0.0002	0.0000	na
11	17-9 x 10-6	274	CR	Distillate	0.01	0.00	0.0004	0.0005	0.0003	0.0000	na	0.0002	0.0000	na
12	17-9 x 10-6	274	CR	Distillate	0.01	0.00	0.0004	0.0005	0.0003	0.0000	na	0.0002	0.0000	na
13	17-9 x 10-6	274	CR	Distillate	0.01	0.00	0.0004	0.0005	0.0003	0.0000	na	0.0002	0.0000	na
24	48 x 68	31,048	CR	Distillate	0.89	0.17	0.0482	0.0597	0.0347	0.0056	na	0.0196	0.0013	na
25	48 x 68	31,048	CR	Distillate	0.94	0.18	0.0506	0.0627	0.0364	0.0059	na	0.0206	0.0014	na
27	12 x 18	363	CR	Distillate	0.01	0.00	0.0004	0.0005	0.0003	0.0000	na	0.0002	0.0000	na
					30.12	1.91	0.58	0.42	0.46	0.04	0.22	0.19	0.00	-

	PRODUCT	CONTROLS	EMISSION FACTOR (mg/l)	ANNUAL THRUPUT (gal/yr)	ANNUAL EMISSIONS (ton/yr) TOTAL VOC	TOTAL HAPs	Hexane	Benzene	Toluene	Ethyl-benzene	Iso-Octane	Xylene	Cumene	MTBE
Loading Rack	Gasoline	VCU	35.00	275,000,000	40.16	2.09	0.6425	0.3614	0.5221	0.0402	0.3213	0.2008	na	na
	Distillate	None	1.853	420,480,000	3.25	0.62	0.1752	0.2171	0.1261	0.0205	na	0.0712	0.0049	na
Barge Loading	Distillate	None	1.853	420,480,000	3.25	0.62	0.1752	0.2171	0.1261	0.0205	na	0.0712	0.0049	na
TOTAL LOADING RACK EMISSIONS					46.66	3.32	0.9930	0.7957	0.7743	0.0811	0.3213	0.3432	0.0098	-

		EMISSION FACTOR (mg/l)	ANNUAL EMISSIONS (ton/yr) Total VOC	Total HAPs	Hexane	Benzene	Toluene	Ethyl-benzene	Iso-Octane	Xylene	Cumene	MTBE
Fugitives	(see page 4)		0.47	0.02	0.0075	0.0042	0.0061	0.0005	0.0037	0.0023	na	na
Cargo Leaks		13.0	14.92	0.78	0.2387	0.1342	0.1939	0.0149	0.1193	0.0746	na	na
TOTAL FUGITIVE EMISSIONS			15.38	0.80	0.2461	0.1384	0.2000	0.0154	0.1231	0.0769	-	-

GRAND TOTAL (ton/yr)									
	92.16	6.03	1.8155	1.3494	1.4301	0.1398	0.6653	0.6128	0.0135	-
	NOx	4.59	CO	11.48						

NOTES:

1. Hazardous Air Pollutant (HAP) emission factors are as follows:

For Gasoline:

HAP	EF (wt%)
Benzene	0.009
Toluene	0.013
Xylene	0.005
Ethyl Benzene	0.001
IsoOctane	0.008
Hexane	0.016
MTBE	na
TOTAL	0.052

Conventional gasoline does not contain MTBE.
Based on *Hazardous Air Pollutant Emissions from Gasoline Loading Operations at Bulk Gasoline Terminals*, API Publication No. 347, Table 5-2, Pg. 5-3, October 1998

For Distillate: At standard temperature of 68 deg. F.

HAP	EF (wt%)
Benzene	0.0668
Toluene	0.0388
Xylene	0.0219
Ethyl Benzene	0.0063
Cumene	0.0015
Hexane	0.0539
TOTAL	0.1892

Extracted from the *Compilation of Air Emission Factors for Petroleum Distributionand Retail Marketing Facilities*, September 1995

TRANSMONTAIGNE TERMINALING INC.

FACILITY NAME: Covington

CALCULATION TABLE 1.

Potential Tank Annual Emission Summary

TANK NO.	ROOF TYPE	CAPACITY (bbls)	CAPACITY (gals)	SERVICE	THRUPUT (gal/yr)	LOSS	EMISSION RATE VOC (lb/yr)	EMISSION RATE VOC (ton/yr)	EMISSION RATE HAPs (lb/yr)	EMISSION RATE HAPs (ton/yr)
1	XFR	31,048	1,304,016	Gasoline	73,725,294	Working	204.48	0.10	10.6330	0.0053
						Breathing	9085.90	4.54	472.4668	0.2362
2	XFR	31,048	1,304,016	Gasoline	73,725,294	Working	204.47	0.10	10.6324	0.0053
						Breathing	9085.90	4.54	472.4668	0.2362
3	XFR	10,743	451,206	Gasoline	25,509,882	Working	120.28	0.06	6.2546	0.0031
						Breathing	7212.56	3.61	375.0531	0.1875
4	XFR	10,743	451,206	Gasoline	25,509,882	Working	120.28	0.06	6.2546	0.0031
						Breathing	7212.56	3.61	375.0531	0.1875
5	XFR	10,743	451,206	Gasoline	25,509,882	Working	120.28	0.06	6.2546	0.0031
						Breathing	7212.56	3.61	375.0531	0.1875
6	XFR	10,743	451,206	Gasoline	25,509,882	Working	120.28	0.06	6.2546	0.0031
						Breathing	7212.56	3.61	375.0531	0.1875
7	XFR	10,743	451,206	Gasoline	25,509,882	Working	120.28	0.06	6.2546	0.0031
						Breathing	7212.56	3.61	375.0531	0.1875
TANK NO.	ROOF TYPE	CAPACITY (bbls)	CAPACITY (gals)	SERVICE	THRUPUT (gal/yr)	LOSS	EMISSION RATE VOC (lb/yr)	EMISSION RATE VOC (ton/yr)	EMISSION RATE HAPs (lb/yr)	EMISSION RATE HAPs (ton/yr)
8	CR	10,743	451,206	Distillate	106,236,207	Working	585.01	0.29	110.6839	0.0553
						Breathing	62.86	0.03	11.8931	0.0059
9	CR	10,743	451,206	Distillate	106,236,207	Working	534.14	0.27	101.0593	0.0505
						Breathing	63.67	0.03	12.0464	0.0060
10	CR	274	11,508	Distillate	2,709,552	Working	14.02	0.01	2.6526	0.0013
						Breathing	1.70	0.00	0.3216	0.0002
11	CR	274	11,508	Distillate	2,709,552	Working	14.02	0.01	2.6526	0.0013
						Breathing	1.71	0.00	0.3235	0.0002
12	CR	274	11,508	Distillate	2,709,552	Working	14.02	0.01	2.6526	0.0013
						Breathing	1.71	0.00	0.3235	0.0002
13	CR	274	11,508	Distillate	2,709,552	Working	14.02	0.01	2.6526	0.0013
						Breathing	1.71	0.00	0.3235	0.0002
24	CR	31,048	1,304,016	Distillate	307,029,857	Working	1602.46	0.80	303.1854	0.1516
						Breathing	186.34	0.09	35.2555	0.0176
25	CR	31,048	1,304,016	Distillate	307,029,857	Working	1690.67	0.85	319.8748	0.1599
						Breathing	186.34	0.09	35.2555	0.0176
27	CR	363	15,246	Distillate	3,589,662	Working	12.02	0.01	2.2742	0.0011
						Breathing	2.27	0.00	0.4295	0.0002
TOTAL GASOLINE		115,811	4,864,062		275,000,000		55244.95	27.62	2872.74	1.44
TOTAL DISTILLATE		32,144	3,571,722		840,960,000		1851.71	0.93	350.34	0.18
TOTAL							57096.66	28.55	3223.08	1.61

NOTES:

1. Tank emissions calculated using TanksESP. See attached TanksESP Output Report.
2. Conventional gasoline does not contain MTBE. 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, Pg. 5-3, October 1998.
3. Distillate HAP emissions based on factors extracted from the *Compilation of Air Emission Factors for Petroleum Distributionand Retail Marketing Facilities*, September 1995.

TRANSMONTAIGNE TERMINALING INC.

FACILITY NAME: Covington

CALCULATION TABLE 2.

Potential VOC Emissions from Loading Rack
and Associated Control Device

LOADING RACK	PRODUCT	THRUPUT (mgal/yr)	S (-)	MW (lb/mol)	P (psia)	T (R)	Control (%)	LI w/control		EMISSION RATE VOC		EMISSION RATE HAPs	
								(lb/mgal)	(mg/l)	(lb/yr)	(tpy)	(lb/yr)	(tpy)
Loading Rack	Gasoline	275,000	na	na	na	na	na	0.29	35	80,316.20	40.16	4,176.44	2.09
	Distillate	420,480	0.6	130	0.0084	528	0	0.0155	1.853	6,501.35	3.25	1,230.05	0.62
Barge Loading	Distillate	420,480	0.6	130	0.0084	528	0	0.0155	1.853	6,501.35	3.25	1,230.05	0.62
TOTAL		1,115,960								93,318.89	46.66	6,636.55	3.32
Annual VOC Truck Vapor Transit Losses								0.11	13	29,831.73	14.92	1551.25	0.78
Products of Combustion							NOx	0.0334	4.0	9,185.00	4.59		
							CO	0.0835	10.0	22,962.50	11.48		

NOTES: 840,960

1. Gasoline and Distillate throughputs based on proposed permit limitations.
2. Gasoline loading rack emission factor based on proposed limitations.
3. Distilltate loading emission factors based on AP-42, Section 5.2.
4. Conventional gasoline does not contain MTBE. 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, Pg. 5-3, October 1998.
5. Distillate HAP emissions based on factors extracted from the *Compilation of Air Emission Factors for Petroleum Distributionand Retail Marketing Facilities*, September 1995.
6. Transit Losses based on AP-42, Section 5.2, Table 5.2-5, Return with vapor, Typical transported 13.0 mg/l.
7. NOx and CO emission factors based on manufacturer's guarantee.

TRANSMONTAIGNE TERMINALING INC.

FACILITY NAME: Covington

CALCULATION TABLE 3.

Fugitive Emissions Summary

Component Type	Service	No. of Components	Leak Factor		EMISSION RATE			
					VOC		HAPs	
			(kg/hr/comp)	(lb/hr/comp)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
Valves	Light Liquid	140	4.30E-05	9.48E-05	0.01	0.0581	0.0007	3.02E-03
	Gas	0	1.30E-05	2.87E-05	-	-	-	0.00E+00
Loading Arm Valves	Light Liquid	0	4.30E-05	9.48E-05	-	-	-	0.00E+00
	Gas	0	1.30E-05	2.87E-05	-	-	-	0.00E+00
Open-End Lines	Light Liquid	31	1.30E-04	2.87E-04	0.01	0.0389	0.0005	2.02E-03
	Gas	0	1.20E-04	2.65E-04	-	-	-	0.00E+00
Fittings (Flanges,	Light Liquid	550	8.00E-06	1.76E-05	0.01	0.0425	0.0005	2.21E-03
Connectors)	Gas	0	4.20E-05	9.26E-05	-	-	-	0.00E+00
Pump Seals	Light Liquid	18	5.40E-04	1.19E-03	0.02	0.0939	0.0011	4.88E-03
	Gas	0	6.50E-05	1.43E-04	-	-	-	-
Other	Light Liquid	185	1.30E-04	2.87E-04	0.05	0.2323	0.0028	0.01
	Gas	0	1.20E-04	2.65E-04	-	-	-	0.00E+00
TOTAL		924			0.11	0.47	0.01	0.02

NOTES:

1. Based on *Fugitive Emissions From Equipment Leaks II: Calculation Procedures for Petroleum Industry Facilities* API Publication No. 343, May 1998.

TankESP Emissions Program Output

TransMontaigne has included in this section, the emissions modeling estimates for the seven (7) permitted storage tanks in support of this Conditional Major Operating Operating Permit. The requested emissions limits are based on the TankESP emissions prediction model and include tank information and throughput information and are found in this section of the application.

The seven (7) permitted storage tanks are as follows –

Tank 1, Tank 2, Tank 3, Tank 4, Tank 5, Tank 6, and Tank 7.

Monthly Tank Report with HAPS for 2021 Annual

Site: Covington,

Equations for this site: After 2019 AP-42 revisions. H/D ratio: calculated

Tank ID	Tank Type	Tank Height (ft)	Tank Diameter (ft)	Product	Number of turnovers	Throughput in gal	RVP	Bulk Liquid Temperature (degF)	Max. Liquid Surface Temp. (degF)	Max. TVP (psia)	Estimated standing losses (lbs)	Estimated working losses (lbs)	Total estimated emissions (lbs)	Total estimated emissions (tons)	Total HAPs (Tons)	Hexane (Tons)	Benzene (Tons)	Toluene (Tons)	Ethylbenzene (Tons)	Iso Octane (Tons)	Xylene (Tons)	Cumene (Tons)
Covington - Tank 01	EFRT	48.0	68.0	Gasoline_X	61.7	73,724,500.0	12.0	57.0	59.5	6.27	9,085.90	204.48	9,290.38	4.65	0.1206	0.0204	0.0233	0.0310	0.0029	0.0284	0.0138	0.0008
Covington - Tank 02	EFRT	48.0	68.0	Gasoline_X	61.7	73,720,900.0	12.0	57.0	59.5	6.27	8,437.56	204.47	8,642.03	4.32	0.1134	0.0190	0.0217	0.0297	0.0028	0.0266	0.0133	0.0007
Covington - Tank 03	EFRT	48.0	40.0	Gasoline_X	61.7	25,509,888.0	12.0	56.9	59.4	6.25	7,212.56	120.28	7,332.84	3.67	0.0901	0.0158	0.0179	0.0229	0.0020	0.0215	0.0094	0.0005
Covington - Tank 04	EFRT	48.0	40.0	Gasoline_X	61.7	25,509,888.0	12.0	56.9	59.4	6.25	7,212.56	120.28	7,332.84	3.67	0.0901	0.0158	0.0179	0.0229	0.0020	0.0215	0.0094	0.0005
Covington - Tank 05	EFRT	48.0	40.0	Gasoline_X	61.7	25,509,888.0	12.0	56.9	59.4	6.25	7,212.56	120.28	7,332.84	3.67	0.0901	0.0158	0.0179	0.0229	0.0020	0.0215	0.0094	0.0005
Covington - Tank 06	EFRT	48.0	40.0	Gasoline_X	61.7	25,509,888.0	12.0	56.9	59.4	6.25	7,212.56	120.28	7,332.84	3.67	0.0901	0.0158	0.0179	0.0229	0.0020	0.0215	0.0094	0.0005
Covington - Tank 07	EFRT	48.0	40.0	Gasoline_X	61.7	25,509,888.0	12.0	56.9	59.4	6.25	7,212.56	120.28	7,332.84	3.67	0.0901	0.0158	0.0179	0.0229	0.0020	0.0215	0.0094	0.0005

Sears, Dylan (EEC)

From: Dirk Wold <dwold@transmontaigne.com>
Sent: Tuesday, August 26, 2025 3:06 PM
To: Sears, Dylan (EEC)
Cc: Ross, Dakota D (EEC); Patil, Durga D (EEC)
Subject: RE: AI 2504 Permit Shield

Dylan,

Thanks for the email. TransMontaigne does not believe there is any non-applicable regulations that would warrant a permit shield.

Thanks, Dirk

From: Sears, Dylan (EEC) <dylan.sears@ky.gov>
Sent: Thursday, August 14, 2025 7:54 AM
To: Dirk Wold <dwold@transmontaigne.com>
Cc: Ross, Dakota D (EEC) <dakota.ross@ky.gov>; Patil, Durga D (EEC) <Durga.Patil@ky.gov>
Subject: AI 2504 Permit Shield

Hello and good morning,
In Regards to the 2023 application for the Covington terminal For TransMontaigne a permit shield was requested in section AI4 of the DEP7007AI form.
Along with this application there is no list of non-applicable regulations submitted along with the application, does TransMontaigne believe there is any non-applicable regulations that would warrant a permit shield?

Dylan Sears
EETI
Division for Air Quality
Chemical Section
300 Sower Boulevard, 2nd floor
Frankfort, KY 40601
502-782-6866