Commonwealth of Kentucky
Division for Air Quality

STATEMENT OF BASIS / SUMMARY

Conditional Major, Operating
Permit: F-25-026
TransMontaigne Operating Company, L.P. - Covington Terminal
700 River Road, Highway 8
Covington, KY 41017

September 12, 2025
Dylan Sears, Reviewer

SOURCE ID:	21-117-00004
AGENCY INTEREST:	2504
ACTIVITY:	APE20230002

Table of Contents

SECTION 1 – SOURCE DESCRIPTION

SIC Code and description: 4226, Special Warehousing and Storage, Not Elsewhere Classified

Single Source Det. ☐ Yes ☒ No If Yes, Affiliated Source AI:

Source-wide Limit ☐ Yes ☒ No If Yes, See Section 4, Table A

28 Source Category ☐ Yes ☒ No If Yes, Category:

County: Kenton
Nonattainment Area ☒ N/A ☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☐ Ozone ☐ Lead
If yes, list Classification: N/A, Maintenance for ozone 2015 standard since November 3, 2023.

PTE* greater than 100 tpy for any criteria air pollutant ☒ Yes ☐ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☒ VOC

PTE* greater than 250 tpy for any criteria air pollutant ☐ Yes ☒ No
If yes, for what pollutant(s)?
☐ PM_{10} ☐ $PM_{2.5}$ ☐ CO ☐ NO_X ☐ SO_2 ☐ VOC

PTE* greater than 10 tpy for any single hazardous air pollutant (HAP) ☐ Yes ☒ No
If yes, list which pollutant(s):

PTE* greater than 25 tpy for combined HAP ☐ Yes ☒ No

*PTE does not include self-imposed emission limitations.

Description of Facility:
TransMontaigne Operating Company, L.P. - Covington Terminal is a bulk petroleum terminal in Covington, KY (Northern Kentucky/Greater Cincinnati area.) The terminal has the capacity to dispense distillate, diesel fuel, conventional and reformulated gasoline, asphalt, bunker fuel oil, glycerin, glycol, kerosene and mineral spirits. At the time of renewal permit V-17-033, the terminal is using external floating roof storage tanks and fixed roof storage tanks for storage of various low vapor pressure petroleum products. The external floating roof storage tanks were constructed during or prior to 1959 and may be used for gasoline storage in the future.

The facility has asphalt heaters to use to heat various tanks. The facility also has multiple loading racks along with barge loading, any of which are capable of asphalt loading.

SECTION 2 – CURRENT APPLICATION AND EMISSION SUMMARY FORM

Permit Number: F-25-026 Activities: APE20230002

Received: November 22, 2023 Application Complete Date(s): July 9, 2025

Permit Action: ☒ Initial ☐ Renewal ☐ Significant Rev ☐ Minor Rev ☐ Administrative

Construction/Modification Requested? ☐Yes ☒No NSR Applicable? ☐Yes ☒No

Previous 502(b)(10) or Off-Permit Changes incorporated with this permit action ☐Yes ☒No

Description of Action:
APE20230003
On November 22, 2023 the Division Received an application for a conditional major permit from the facility to change from a Title V permit. It should be noted on December 12, 2022 the Division received an application for a renewal for their previous Title V permit, along with emission updates for several pieces of equipment.

F-25-026 Emission Summary		
Pollutant	2024 Actual (tpy)	PTE F-25-026 (tpy)
CO	0.021	5.48
NO_X	0.025	6.52
PT	0.0019	0.50
PM_{10}	0.0019	0.50
$PM_{2.5}$	0.0019	0.50
SO_2	0.00015	0.039
VOC	0.48	123.14*
Lead	0	0
Greenhouse Gases (GHGs)		
Carbon Dioxide	29.77	7,826
Methane	0.00057	0.15
Nitrous Oxide	0.00055	0.14
CO_2 Equivalent (CO_2e)	29.95	7,873
Hazardous Air Pollutants (HAPs)		
Styrene	0	2.60
Hexane	0.025	1.82
Benzene	0.031	1.51
Toluene	0.018	1.41
Xylenes (Total)	0.029	0.66
Combined HAPs:	0.103	8.01

VOC emissions represent uncontrolled emissions (as do all pollutants), 40 CFR 60 Subpart XX requires that emission from loading gasoline be routed to a vapor collection system with emissions not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded. The Division calculated controlled VOC PTE is 84.51 tons per year.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS

Emission Unit 001a (01) Loading Rack LR-1				
Pollutant	**Emission Limit or Standard**	**Regulatory Basis for Emission Limit or Standard**	**Emission Factor Used and Basis**	**Compliance Method**
VOC	35 mg/liter gasoline loaded	40 CFR 60.502(b)	0.292 lb/1000gal AP-42 Chapter 5.2	Refer to Testing Requirements

Initial Construction and Modification Date: 1958; modified after December 17, 1980

Process Description:
Two-Bay Tank Truck Loading Rack with ten loading arms and associated pipeline equipment. The loading rack can load the following liquids: diesel fuel, asphalt, mineral spirits, and petroleum products with a Reid vapor pressure less than 27.6 kilopascals (gasoline Reid vapor pressure).
Capacity: 275,000,000 gallons gasoline per year*
420,480,000 gallons distillate (or other low vapor pressure products) per year
12,000,000 gallons styrene per year

Applicable Regulation:

When in gasoline service as defined in 40 CFR 63, Subpart BBBBBB:
401 KAR 60:005 Section 2(2)(eee), 40 CFR 60.500 through 60.506 (**Subpart XX**), *Standards of Performance for Bulk Gasoline Terminals That Commenced Construction, Modification, or Reconstruction After December 17, 1980, and On or Before June 10, 2022*
This regulation applies when loading gasoline as this emission unit was constructed in 1985. The Vapor Control Unit shall operate according to 40 CFR 60.500 to 60.506 (Subpart XX). To comply with the requirements for the vapor collection and processing systems, the source shall send all required vapor streams to its proposed flare when in gasoline service.

401 KAR 63:002, Section 2(4)(ccccc), 40 CFR 63.11080 through 63.11100, Tables 1 through 4 (**Subpart BBBBBB**), *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*
This regulation applies to gasoline loading racks at area source Gasoline Distribution Bulk Terminals.

When not in gasoline service as defined in 40 CFR 63, Subpart BBBBBB:
401 KAR 63:020, *Potentially hazardous matter or toxic substances***.**
This regulation is applicable to any emission unit which emits or may emit potentially hazardous matter or toxic substances which may be harmful to humans, animals, and plants, where such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division for Air Quality.

Precluded Regulations:
401 KAR 52:020, *Title V permits*

Comments:
* To meet the requirements pursuant to 40 CFR 60, Subpart XX and 40 CFR 63, Subpart BBBBBB, a control device must be installed prior to storage and transfer of gasoline products.

401 KAR 63:020 is applicable only when processing petroleum liquids that are not gasoline.

Emission Unit 001b(01) Loading Rack LR-2

Initial Construction and Modification Date: 1958; modified after December 17, 1980

Process Description:
Loading rack is used to load asphalt. The loading rack also performs barge loading of distillate, asphalt, and glycerin materials.

Capacity: 420,480,000 gallons distillate/asphalt/glycerin year
Control Equipment: None

Applicable Regulation:
401 KAR 63:020, *Potentially hazardous matter or toxic substances*.
This regulation is applicable to any emission unit which emits or may emit potentially hazardous matter or toxic substances which may be harmful to humans, animals, and plants, where such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division for Air Quality.

Precluded Regulations:
401 KAR 52:020, *Title V permits*

Comments:
Emission Factors for loading are derived from AP 42 Chapter 5.2.
*Other loading types are considered under low vapor pressure distillate loading.

Petroleum Product Storage Tanks

Initial Construction Dates: *See Below*

Process Description:
Emission Unit: 002 External Floating Roof Petroleum Storage Tanks

Description:
Six tanks used to store petroleum products.
Tank T-2 1,304,016 gallon capacity
Tanks T-3 thru T-7 451,206 gallon capacity (each tank)
Products stored: Distillate or Gasoline in Tanks T-2 through T-7;
Control Equipment: External Floating Roof in Tanks T-2 through T-7;
Constructed: 1959 (all tanks)

Emission Unit: 004 External Floating Roof Styrene Storage Tank

Description:
Tank T-1 1,304,016 gallon capacity
Products stored: Styrene
Control Equipment: none
Constructed: 1959 (Converted to external floating roof tank in 2021)

Emission Unit: IA2 Fixed Roof Petroleum Liquid Storage Tanks

Description:
Five tanks used to store low vapor pressure petroleum products.

Petroleum Product Storage Tanks

Tank T-10 thru T-13: 1,508 gallon capacity (each tank)
Tank T-27: 8,883 gallon capacity
Control Equipment: None
Products stored: Distillate
Constructed: 1959 (All Tanks)

Emission Unit: IA3 Fixed Roof Petroleum Liquid Storage Tanks

Description:
Two tanks used to store low vapor pressure petroleum products.
Tank T-8 and T-9: 451,206 gallon capacity (each tank)
Products stored: Distillate
Control Equipment: None

Emission Unit: IA4 Fixed Roof Petroleum Liquid Storage Tanks

Description:
Two tanks used to store low vapor pressure petroleum products.
Tank T-24 and T-25: 1,304,016 gallon capacity (each tank)
Products stored: Distillate
Control Equipment: None

Emission Unit: IA5 Fixed Roof Petroleum Liquid Storage Tanks

Description:
One tank used to store low vapor pressure petroleum products.
Tank T-14 15,558 gallon capacity
Products stored: Distillate
Control Equipment: None

Applicable Regulation:

401 KAR 61:050, *Existing storage vessels for petroleum liquids*.
This regulation is applicable to petroleum storage vessels greater than 580 gallons which commenced construction prior to April 9, 1972 that is located in a county or portion of a county which is designated ozone nonattainment under 401 KAR 51:010.

401 KAR 63:002, Section 2(4)(ccccc), 40 C.F.R. 63.11080 through 63.11100, Tables 1 through 4 (**Subpart BBBBBB**), *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*
This regulation applies to gasoline storage tanks at area source Gasoline Distribution Bulk Terminals.

401 KAR 63:020, *Potentially hazardous matter or toxic substances*.
This regulation is applicable to any emission unit which emits or may emit potentially hazardous matter or toxic substances which may be harmful to humans, animals, and plants, where such emissions are not elsewhere subject to the provisions of the administrative regulations of the Division for Air Quality.

Precluded Regulations:
401 KAR 52:020, *Title V permits*

Petroleum Product Storage Tanks

Comments:
401 KAR 63:020 is applicable only while loading petroleum liquids that are not gasoline.

Emission Unit 012 (BRG-1) Barge Loading

Initial Construction and Modification Date: 1958; modified after December 17, 1980

Process Description:
Consists of barge loading pipeline equipment used for the handling of asphalt, distillate and glycol materials.

Capacity: 420,480,000 gallons distillate/glycol/asphalt/ year

Applicable Regulation:
401 KAR 63:002 Section 2(4)(q), 40 C.F.R. 63.560 through 63.568 (**Subpart Y**), *National Emission Standards for Marine Tank Vessel Loading Operations.*
This regulation applies to barge loading operations.

Precluded Regulations:
401 KAR 52:020, Title V permits

Comments:
Emission Factors for loading are derived from AP 42 Chapter 5.2
*Other loading types are considered under low vapor pressure distillate loading.

Emission Unit 020 (--) Three Asphalt Heaters

Initial Construction Date: June 1998

Process Description:
Three (3) Hot oil asphalt heaters.

Rated Heat Capacity: Hot oil asphalt heater #1 (10.5 MMBtu/hr)
Hot oil asphalt heater #2 (2.35 MMBtu/hr)
Hot oil asphalt heater #3 (2.35 MMBtu/hr)
Primary Fuel: Natural Gas

Applicable Regulation:
401 KAR 59:015, New indirect heat exchangers.
This regulation applies to indirect heat exchangers having a heat input capacity greater than 1 MMBtu/hr

401 KAR 60:005 Section 2(2)(d) 40 C.F.R. 60.40c through 60.48c (**Subpart Dc**), *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.*
This regulation applies to steam generating units constructed after June 9, 1989 with a maximum design heat input of greater than 10 MMBtu/hr

Emission Unit 020 (--) Three Asphalt Heaters
Precluded Regulations: 401 KAR 52:020, Title V permits **Comments:** Emission Factors from AP-42 Table 1.4-1 for small boilers (<100) uncontrolled and AP-42 Table 1.4-2 in the absence of unit specific data.

SECTION 3 – EMISSIONS, LIMITATIONS AND BASIS (CONTINUED)

Testing Requirements\Results

N/A

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS

Table A - Group Requirements:

Emission and Operating Limit	Regulation	Emission Unit
90 tpy of VOC emissions	401 KAR 52:030, *Federally-enforceable permits for nonmajor sources*	Source-wide

Table B - Summary of Applicable Regulations:

Applicable Regulations	Emission Unit
401 KAR 61:055, Existing loading facilities at bulk gasoline terminals.	001a
401 KAR 60:005 Section 2(2)(eee), 40 C.F.R. 60.500 through 60.506 (Subpart XX), Standards of Performance for Bulk Gasoline Terminals.	001a
401 KAR 63:002 Section 2(4)(ccccc), 40 C.F.R. 63.11080 through 63.11132 (Subpart BBBBBB), National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.	001a, Petroleum Product Storage Tanks
401 KAR 63:020, Potentially hazardous matter or toxic substances.	001a, 001b, Petroleum Product Storage Tanks
401 KAR 61:050, Existing storage vessels for petroleum liquids.	Petroleum Product Storage Tanks
401 KAR 63:002 Section 2(4)(q), 40 C.F.R. 63.560 through 63.568 (Subpart Y), National Emission Standards for Marine Tank Vessel Loading Operations.	012
401 KAR 59:015, New indirect heat exchangers.	020
401 KAR 60:005 Section 2(2)(d) 40 C.F.R. 60.40c through 60.48c (Subpart Dc), Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.	020

Table C - Summary of Precluded Regulations:

Precluded Regulations	Emission Unit
401 KAR 52:020, Title V permits	SOURCE-WIDE

Table D - Summary of Non Applicable Regulations:

N/A

SECTION 4 – SOURCE INFORMATION AND REQUIREMENTS (CONTINUED)

Air Toxic Analysis

401 KAR 63:020, *Potentially Hazardous Matter or Toxic Substances*
The Division for Air Quality (Division) has performed modeling using AERMOD on June 27, 2025 of potentially hazardous matter or toxic substances (Benzene, Hexane, Toluene, Xylene, Styrene) that may be emitted by the facility based upon the process rates, material formulations, stack heights and other pertinent information provided by the applicant. Based upon this information, the Division has determined that the conditions outlined in this permit will assure compliance with the requirements of 401 KAR 63:020.

Single Source Determination
N/A

SECTION 5 – PERMITTING HISTORY

Permit Number	Permit type	Activity#	Complete Date	Issuance Date	Summary of Action
V-98-019	Initial	F502		2/5/1999	Initial operating permit
V-05-085	Renewal	APE20040001	8/19/20003		Renewal Operating Permit
V-11-057	Renewal	APE20110001	11/1/2011	1/17/2013	Renewal Operating Permit
V-17-033	Renewal	APE20170002	12/12/2017	6/11/2018	Renewal
V-17-033 R1	Minor revision	APE20200001	5/28/2020	5/23/2021	Updates to Tank T-1; Loading Rack LR-1; addition of 401 KAR 59:015, Section 7 requirements

SECTION 6 – PERMIT APPLICATION HISTORY

N/A

APPENDIX A – ABBREVIATIONS AND ACRONYMS

AAQS – Ambient Air Quality Standards
BACT – Best Available Control Technology
Btu – British thermal unit
CAM – Compliance Assurance Monitoring
CO – Carbon Monoxide
Division – Kentucky Division for Air Quality
ESP – Electrostatic Precipitator
GHG – Greenhouse Gas
HAP – Hazardous Air Pollutant
HF – Hydrogen Fluoride (Gaseous)
MSDS – Material Safety Data Sheets
mmHg – Millimeter of mercury column height
NAAQS – National Ambient Air Quality Standards
NESHAP – National Emissions Standards for Hazardous Air Pollutants
NO_x – Nitrogen Oxides
NSR – New Source Review
PM – Particulate Matter
PM_{10} – Particulate Matter equal to or smaller than 10 micrometers
$PM_{2.5}$ – Particulate Matter equal to or smaller than 2.5 micrometers
PSD – Prevention of Significant Deterioration
PTE – Potential to Emit
SO_2 – Sulfur Dioxide
TF – Total Fluoride (Particulate & Gaseous)
VOC – Volatile Organic Compounds