N E I G H B O R H O O D S D E P A R T M E N T

TECHNICAL EVALUATION
&
PRELIMINARY DETERMINATION

APPLICANT

BP Products North America, Inc.
2101 Zoo Parkway
Jacksonville, Florida 32218
Facility ID No. 0310179

PROJECT

Air Construction Permit
Revised Draft Permit No. 0310179-018-AC
Replacement of Internal Floating Roof, Tank No. 3

COUNTY

Duval, Florida

PERMITTING AUTHORITY

Neighborhoods Department
Environmental Quality Division
Ed Ball Building, 214 North Hogan Street, 7th Floor
Jacksonville, Florida 32202
Telephone; (904) 255-7100
Fax: (904) 588-0518

1. GENERAL PROJECT INFORMATION

Air Pollution Regulations

Projects at stationary sources with the potential to emit air pollution are subject to the applicable environmental laws specified in Section 403 of the Florida Statutes (FS). The statutes authorize the Department of Environmental Protection (Department) to establish regulations regarding air quality as part of the Florida Administrative Code (FAC), which includes the following applicable chapters: 62-4 (Permits); 62-204 (Air Pollution Control – General Provisions); 62-210 (Stationary Sources – General Requirements); 62-212 (Stationary Sources – Preconstruction Review); 62-213 (Operation Permits for Major Sources of Air Pollution); 62-296 (Stationary Sources - Emission Standards); and 62-297 (Stationary Sources – Emissions Monitoring). Specifically, air construction permits are required pursuant to Rules 62-4, 62-210 and 62-212, F.A.C.

In addition, the U. S. Environmental Protection Agency (EPA) establishes air quality regulations in Title 40 of the Code of Federal Regulations (CFR). Part 60 specifies New Source Performance Standards (NSPS) for numerous industrial categories. Part 61 specifies National Emission Standards for Hazardous Air Pollutants (NESHAP) based on specific pollutants. Part 63 specifies NESHAP based on the Maximum Achievable Control Technology (MACT) for numerous industrial categories. The Department adopts these federal regulations on a quarterly basis in Rule 62-204.800, FAC.

In accordance with the terms of its Specific Operating Agreement, the Environmental Quality Division has the authority to process this application.

Glossary of Common Terms

Because of the technical nature of the project, the permit contains numerous acronyms and abbreviations, which are defined in Appendix A-1 of this permit.

Facility Description and Location

BP Products North America, Inc. is an existing bulk petroleum products storage and distribution terminal, categorized under Standard Industrial Classification (SIC) Code No. 5171. The facility is located in Duval County at 2100 Zoo Parkway in Jacksonville, Florida 32218. The UTM coordinates of the existing facility are Zone 17, 441.800 km East, and 3364.630 km North. The facility is located in an area designated as unclassifiable for the air pollutants particulate matter less than or equal to ten (10) micrometers, sulfur dioxide, and lead; and in an air quality maintenance area for ozone, and in the area of influence of an air quality maintenance area for particulate matter pursuant to Chapter 62-204, FAC, and Rule 2.201, Jacksonville Environmental Protection Board (JEPB).

Facility Regulatory Categories

- The facility is not a major source of hazardous air pollutants (HAP).
- The facility has no units subject to the acid rain provisions of the Clean Air Act.
- The facility is a Title V major source of air pollution in accordance with Chapter 213, F.A.C.
- The facility is not a major stationary source in accordance with Rule 62-212.400, FAC for the Prevention of Significant Deterioration (PSD) of Air Quality.

Project Description

The purpose of this Air Construction Permit is to replace the internal floating roof, several levels of steel wall plates, and all of the nozzles, flanges and fittings for Tank No. 3, located at Terminal B. The new Emissions Unit (EU) No. 033 was created for Tank No. 3, which was previously a part of EU No. 027.

Processing Schedule

May 24, 2012: Received the application for a major source air pollution construction permit. (Additional information submitted August 8, 2012)

2. PSD APPLICABILITY

General PSD Applicability

For areas currently in attainment with the state and federal AAQS or areas otherwise designated as unclassifiable, the Permitting Authority regulates major stationary sources of air pollution in accordance with Florida's PSD preconstruction review program as defined in Rule 62-212.400, FAC. Under preconstruction review, the Permitting Authority first must determine if a project is subject to the PSD requirements ("PSD applicability review") and, if so, a PSD preconstruction review must be conduct. A PSD applicability review is required for projects at new and existing major stationary sources. In addition, proposed projects at existing minor sources are subject to a PSD applicability review to determine whether potential emissions *from the proposed project itself* will exceed the PSD major stationary source thresholds. A facility is considered a major stationary source with respect to PSD if it emits or has the potential to emit:

- 250 tons per year or more of any regulated air pollutant; or
- 100 tons per year or more of any regulated air pollutant and the facility belongs to one of the following 28 PSD-major facility categories: fossil fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input, coal cleaning plants (with thermal dryers), Kraft pulp mills, portland cement plants, primary zinc smelters, iron and steel mill plants, primary aluminum ore reduction plants, primary copper smelters, municipal incinerators capable of charging more than 250 tons of refuse per day, hydrofluoric, sulfuric, and nitric acid plants, petroleum refineries, lime plants, phosphate rock processing plants, coke oven batteries, sulfur recovery plants, carbon black plants (furnace process), primary lead smelters, fuel conversion plants, sintering plants, secondary metal production plants, chemical process plants, fossil fuel boilers (or combinations thereof) totaling more than 250 million British thermal units per hour heat input, petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels, taconite ore processing plants, glass fiber processing plants and charcoal production plants.

PSD Applicability for Project

The existing facility is not a major stationary source of air pollution for Prevention of Significant Deterioration (PSD) purposes because the potential emissions of PSD air pollutants are less than 250 tons per year pursuant to Rule 62-210.200(194), FAC, and Rule 2.301, JEPB. This project is not subject to PSD preconstruction review requirements since the proposed project itself has potential emissions of PSD air pollutants that are less than 250 tons per year pursuant to Rule 62-210.200(194), FAC, and Rule 2.301, JEPB. The facility after completion of this project will not be a major stationary source of air pollution for PSD purposes because the potential emissions of PSD air pollutants will be less than 250 tons per year pursuant to Rule 62-210.200(194), FAC, and Rule 2.301, JEPB.

3. APPLICATION REVIEW

Discussion of Emissions

VOC emissions are associated with the storage of gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blend, or lower vapor pressure VOL products. As stated in the permit application, the proposed construction project will not increase the actual emissions from the facility and will not increase the permitted throughput.

State Requirements

Tank Nos. 2 and 4 of Emission Unit No. 027 are subject to the Reasonably Available Control Technology (RACT) requirements including **Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) Emitting Facilities** [Rule 62-296.500(1 & 2), FAC, and Rule 2.1101, JEPB]; and **Petroleum Liquid Storage** [Rule 62-296.508, FAC, and Rule 2.1101, JEPB].

Federal NESHAP Provisions

The fixed capital cost of the replacement of the components of Tank No. 3 is estimated to exceed 50 percent of the fixed capital cost that would be required to construct a comparable new storage tank. This is considered a reconstruction according to 40 CFR 63.2. Accordingly, Tank No. 3 of Emission Unit No. 033 is a reconstructed affected source subject to **40 CFR 63, Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities,** and 40 CFR 63, Subpart A, General Provisions, Reporting Requirements, Notification Requirements, and Standards of Performance.

The fixed capital cost of the replacement of the components of Tank No. 3 is estimated to exceed 50 percent of the fixed capital cost that would be required to construct a comparable new storage tank. This is considered a reconstruction according to 40 CFR 60.15. Accordingly, Tank No. 3 is subject to **40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984,** and applicable portions of Subpart A, General Provisions.

4. PRELIMINARY DETERMINATION

The Permitting Authority makes a preliminary determination that the proposed project will comply with all applicable state and federal air pollution regulations as conditioned by the draft permit. This determination is based on a technical review of the complete application, reasonable assurances provided by the applicant, and the conditions specified in the draft permit.

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