STATEMENT OF BASIS

Title V Air Operation Permit Revision
DRAFT Permit No. 0310179-019-AV
Revision of Title V Operation Permit No. 0310179-014-AV

APPLICANT

The applicant for this project is BP Products North America, Inc. The applicant's responsible official and mailing address are: Mr. Mike Lalli, Terminal Manager, BP Products North America, Inc., P.O. Box 26038, Jacksonville, Florida 32226.

FACILITY DESCRIPTION

BP Products North America, Inc. is a bulk petroleum products storage and distribution terminal located at P.O. Box 26038, Jacksonville, Duval County, Florida 32226. Petroleum products (gasoline, diesel fuel, kerosene and jet fuel) and denatured ethanol are received from sea going vessels, railcar tankers and tanker trucks. These products are stored in the appropriate fixed or floating roof storage tanks. Gasoline, diesel fuel, denatured ethanol and jet fuel are then loaded into tanker trucks at one of the two tank truck loading rack systems. Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) emissions from these loading operations are controlled by use of either a carbon adsorption/absorption vapor recovery unit (VRU) or a vapor combustion unit (VCU). Distillates, denatured ethanol, and/or lower vapor pressure petroleum products can be loaded into marine vessels and railcar tankers. Petroleum contact water (PCW) from storm water and spills at the truck loading rack and from water draws from the gasoline and distillate storage tanks go to PCW tanks and is stored until it is shipped offsite for disposal.

PROJECT DESCRIPTION

This permit is for the purpose of revising Title V Air Operation Permit No. 0310179-014-AV by incorporating the applicable terms and conditions identified in Construction Permit No. 0310179-013-AC issued on June 24, 2010, specifically, the replacement of the internal floating roof for Tank No. 108. Pumps, valves and fittings will also be added to Tank No. 108. In addition, Tank No. 108 will be moved from Emission Unit No. 020 to Emission Unit No. 011 since it will now be 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. Tank No. 106 under Emission Unit No. 020 will be removed from the permit as it is currently out of service and going through closure.

PRIMARY REGULATORY REQUIREMENTS

BP Products North America, Inc. is a major source of air pollution because the potential emissions of one or more individual criteria pollutants is greater than 100 tons per year pursuant to Chapter 62-210, FAC, and Rule 2.301, Jacksonville Environmental Protection Board (JEPB). BP Products North America, Inc. is major for VOCs.

Based on the Title V Operation Permit Revision Application received September 19, 2012 this facility is a synthetic minor source of hazardous air pollutants (HAPs).

CAM: Emission Unit Nos. 016 and 024 are subject to Compliance Assurance Monitoring (CAM).

MACT: Emissions Unit Nos. 011, 016, 019, 024, 027, 028, and 030 are 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 applicable provisions of 40 CFR 63, Subpart A,

General Provisions, Reporting Requirements, Notification Requirements, and Standards of Performance. Subpart BBBBBB was proposed on November 9, 2006 and was promulgated on January 10, 2008.

Emission Unit No. 032 is subject to 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. New Reciprocating Internal Combustion Engines at an area source must meet the requirements of this subpart by meeting the requirements of 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines and 40 CFR 60, Subpart A, General Provisions.

BP Products North America, Inc. is subject to 40 CFR 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations: 40 CFR 63. 420(a), 40 CFR 63. 420(c), and 40 CFR 63.428(i).

NSPS: Emission Unit No.028 is subject to 40 CFR 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction Reconstruction, or Modification Commenced after May 18, 1978, and prior to July 23, 1984, and applicable provisions of 40 CFR 60, Subpart A, General Provisions, Reporting Requirements, Notification Requirements, and Standards of Performance.

Emission Unit No. 011 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 Subpart A, General Provisions, Reporting Requirements, Notification Requirements, and Standards of Performance.

Emission Unit No. 024 is subject to 40 CFR 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals, and 40 CFR 60, Subpart A, General Provisions, Reporting Requirements, Notification Requirements, and Standards of Performance.

PSD: The facility is not a Prevention of Significant Deterioration (PSD)-major source of air pollution in accordance with Rule 62-212.400, F.A.C.

RACT: Emission Unit Nos. 019 and 027 are subject to Reasonable Available Control Technologies (RACT).

PROJECT REVIEW

This permit is for the purpose of revising Title Air Operation Permit No. 0310179-014-AV by incorporating the terms and conditions of Air Construction Permit No. 0310179-013-AC, specifically, the replacement of the internal floating roof for Tank No. 108. Pumps, valves and fittings will also be added to Tank No. 108. In addition, Tank No. 108 will be moved from Emission Unit No. 020 to Emission Unit No. 011 since it will now be 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. Tank No. 106 under Emission Unit No. 020 will be removed from the permit as it is currently out of service and going through closure.

Permitting Note: Emission Unit Nos.011, 016, 019, 024, 027, 028 and 030 in Permit No. 0310179-014-AV are 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. The **specific requirements** for these emission units were not present in this permit. The applicable specific requirements of this rule have been added to the above indicated emission units in Permit No. 0310179-019-AV.

CONCLUSION

This project revises Title V Air Operation Permit No. 0310179-014-AV, which was issued on January 27, 2012. This Title V Air Operation Permit Revision is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Chapters 62-4, 62-210 and 62-213, Florida Administrative Code (F.A.C.). In accordance with the terms and conditions of this permit, the above named permittee is hereby authorized to operate the facility as shown on the application and approved drawing(s), plans, and other documents on file with the Permitting Authority.

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