STATEMENT OF BASIS

Center Point Terminal Company
Jacksonville North

Facility ID No.: 0310562
Duval County

Initial Title V Air Operation Permit
Final Permit No.: 0310562-004-AV

This Title V air operation permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-210, and 62-213. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

This facility consists of Fuel Storage Tanks. Fuel products will be unloaded from barges, ships, rail cars and tankers to the fuel storage tanks. The various fuels include gasoline (all types), gasoline blends, ethanol, aviation fuels, distillate fuel oils including biodiesel, and/ or other non-petroleum products.

This facility also has two (2) Truck Rack Tank Farms that are equipped with blending equipment and related piping for ethanol blending with gasoline. Additional equipment for the injection of fuel additives (gasoline and diesel additives, and red dye) will be operated at both truck racks.

There are Floating Roof Storage Tanks that will manage various fuels including gasoline (all types), gasoline blends, ethanol, aviation fuels, distillate fuel oils including biodiesel, and/ or other non-petroleum products.

EU No.	Brief Description
Regulated Emissions Units	
001	Floating Roof Storage North and South Tanks
002	Truck Rack South Tank Farm
003	Truck Rack North Tank Farm
004	Leaks for Equipment Components
005	Emergency Engines
Unregulated Emissions Units and Activities	
xxx	Fixed Roof Storage Tanks (capacity < 42,000 gallons) Additives and transmix

Processing Schedule

7/30/13 Received the application for a minor source air pollution construction permit.
09/06/13 Requested Additional Information (via phone)
09/18/13 Requested Additional Information
09/27/13 Received Additional Information

10/10/13 Received Additional Information
10/25/13 Received Additional Information
12/06/13 Received Additional Information
12/09/13 Received Additional Information

Issued a Revised Draft/Proposed Permit to address:

EU001 Fuel Storage Tanks Equipped with Floating Roof

1. *{PERMITTING NOTE: Since all of the tanks in EU001 have IFR and are capable of storing gasoline, they have the flexibility to store any fuel.}*

2. To correct Tank No. from ~~81-2~~ to 27-2

EU002 Truck Rack South Tank Farm

3. **B.15. Alternative to the CMS Requirements (BBBBBB).** ~~The owner or operator shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a CMS while gasoline vapors are displaced to the vapor processor systems~~ To provide assurance of compliance with the TOC emissions from the loading rack of 80 mg/l (**see Specific Condition No. B.6.**): As an alternative to paragraph (b)(1)(iii)(A) of this section, you may choose to meet the requirements listed in paragraphs (b)(1)(iii)(B)(*1*) and (*2*) of this section.....

   {Permitting Note: The monitoring and inspection plan is reflected in the Appendix CAM Final Plan.}

EU003 Truck Rack North Tank Farm

4. **C.11. Alternative to the CMS Requirements (BBBBBB).** ~~The owner or operator shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a CMS while gasoline vapors are displaced to the vapor processor systems~~ To provide assurance of compliance with the TOC emissions from the loading rack of 80 mg/l (**see Specific Condition No. C.4.b**): As an alternative to the CMS in paragraph (b)(1)(i)(A) of this section, you may choose to meet the requirements listed in paragraph (b)(1)(i)(B)(*1*) and (*2*) of this section....

   {Permitting Note: The monitoring and inspection plan is reflected in the Appendix CAM Final Plan.}

EU005 Emergency Engines

5. **Compliance Requirements:**

E.1. **Engine 1:** Operators comply by purchasing an engine certified by the Environmental Protection Agency (EPA) to meet 40 CFR Subpart 60 exhaust emissions and must install, configure, operate, and maintain the engine per the manufacturer's instructions.

E.2. **Engine 2:** Operators complied by purchasing an engine certified by the manufacturer to comply with EPA/CARB Tier 2, 40 CFR Subpart 60 exhaust emission regulations and must install, configure, operate, and maintain the engine per the manufacturer's instructions.

E.3. **General Provisions (40 CFR Part 60):** Table 8

E.4. **Engine 3:** Operators complied by purchasing an engine certified by the Environmental Protection Agency (EPA) to comply with NSPS 40 CFR Subpart 60 for stationary spark-ignited emissions and must maintain the engine per the manufacturer's instruction.

E.5. **General Provisions (40 CFR Part 60):** 60.4246, Table 3

Applicant: The applicant for this project is Center Point Terminal Company. The applicant's responsible official and mailing address are: Mr. Ken Fenton, President, Apex Oil Company, 8235 Forsyth Blvd, Suite 400, Clayton, MO. 63105.

Project Description: The purpose of this permit is for an Initial Air Title V permit and to incorporate the Air Construction Permit No. 0310562-005-AC.

Facility Description: The applicant operates the Center Point Terminal Company, which is located at 3101 Tallyrand Ave, Jacksonville, Florida. The facility is a Gasoline Bulk Terminal (Standard Industrial Classification No. 5171).

On July 30, 2013, NED received a Title V Operation permit application from Center Point Terminal Company. Prior to the application submittal, the facility operated their petroleum terminal under a Non-Title V Operation Permit. The facility purchased Chevron Jacksonville Terminal (located on adjacent property) and transferred Chevron's FESOP permit to them on June 6, 2013. The two facilities are now combined into a single facility under the existing Center Point Terminal's AIRS ID number 0310562. (Chevron's old AIRS ID number was 0310187). The single facility is classified as a Title V source.

The primary emission sources of volatile organic compounds (VOC) and hazardous air pollutants (HAP) are:

- Floating Roof Storage Tanks for storing various fuels including gasoline (all types), gasoline blends, ethanol, aviation fuels, distillate fuel oils including biodiesel, and/ or other non-petroleum products.
- Fixed Roof Tanks for storing Petroleum Liquid Storage.
- Loading Rack with Vapor Recovery Unit (VRU) and a Loading Rack with a flare for loading for ethanol blending with gasoline.
- Piping and Equipment include: Valves, fittings, and other equipment associated with petroleum products and gasoline/ ethanol blend loading operations.
- Emergency Generator Engine

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Primary Regulatory Requirements
Title III: The facility is a minor source of HAP.
Title V: The facility is a Title V major source in accordance with Chapter 62-213, Florida Administrative Code (F.A.C.).
PSD: The facility is not a Prevention of Significant Deterioration (PSD) source of air pollution in accordance with Rule 62-212.400, F.A.C.
NSPS: The facility operates units subject to the New Source Performance Standards (NSPS) of 40 Code of Federal Regulations (CFR) 60.
NESHAP: The facility operates units subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) of 40 CFR 63.
CAM: Compliance Assurance Monitoring (CAM) does apply to the loading rack with the VRU and the flare.

This Title V air operation permit revision is issued under the provisions of Chapter 403, Florida Statues (F.S.), and Chapters 62-4, 62-210, 62-213 and 214, 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 drawings, plans, and other documents, on file with the permitting authority.

Project Review

EU001 consist of North Tank Farm (Formerly Chevron) and South Tank Farm. The maximum throughput rate for this EU **(Total for all North and South Tanks)** shall not exceed 700 million gallons per year of product. [Rule 62-210 (PTE), FAC, and Air Construction Permit No. 0310562-005-AC]

{The North Tank Farm (Formerly Chevron) is regulated under Rule 62-296.508, F.A.C. - Petroleum Liquid Storage., and Rule 2.1301, JEPB}

{ The South Tank Farm is regulated under 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.

The combined Tank Farms are now also regulated under 40 CFR 63, Subpart BBBBBB and 40 CFR 63, Subpart A NESHAPS General Provisions.

EU002 Truck Rack South Tank Farm, EU**003** Truck Rack North Tank Farm and **EU004** Leaks for Equipment Components: These EUs are regulated under 40 CFR 60, Subpart XX and 40 CFR 60, Subpart A, NSPS General Provisions and Rule 62-297.440(2)(b)2., F.A.C., Rule 62-204.800(8)(b)56., FAC, 62-296.510(3), FAC, Rule 2.1101, Rule 2.201 JEPB and Rule 2.1201. JEPB and 40 CFR 63, Subpart BBBBBB.

EU005 Emergency Engines: These EUs are regulated under 40 CFR 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, 40 CFR 60, Subpart A- General Provisions, 40 CFR 60, Subpart JJJJ—Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and 40 CFR 63 NESHAP, Subpart ZZZZ-National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

There are Fixed Roof Storage Tanks (Additives and transmix) that are on the Insignificant Activities List (capacity < 42,000 gallons).

PROCESS FLOW DIAGRAM

Based on the initial Title V air operation permit application received July 30, 2013, this facility **is not** a major source of hazardous air pollutants (HAP).

EMISSION SUMMARY

EU	VOC tpy	NOx tpy	CO tpy	SO2 tpy	PM10 tpy	Total HAP tpy
001 Floating Roof Storage Tanks	67.13	0	0	0	0	3.49
002 Truck Rack South Tank Farm	71.33	39.42	65.70	0	0	3.71
003 Truck Rack North Tank Farm	48.87	0	0	0	0	2.54
004 Leaks for Equipment Components	2.22					0.115
Insignificant Activities	2.52	4.31	1.03	0.07	0.12	0.18
Total	192.07	43.73	66.73	0.07	0.12	10.04