STATEMENT OF BASIS

Title V Air Operation Permit Revision
PROPOSED Permit No.: 0310028-024-AV
Revision of Title V Air Operation Permit No.: 0310028-019-AV

APPLICANT

The applicant for this project is NuStar Terminals Operations Partnership, L.P., NuStar Jacksonville Terminal. The applicant's responsible official and mailing address are: Mr. Kyle D. Oppliger, General Manager, NuStar Energy, L.P., 3033 Marina Bay Drive, Suite 310, League City, TX 77573.

FACILITY DESCRIPTION

This facility is a petroleum and non-petroleum products warehouse and storage terminal facility. The facility operations include storage tanks, tank truck loading, rail car loading and unloading, tanker ship loading and unloading, barge loading and unloading, and other handling and transfer operations of petroleum products.

PROJECT DESCRIPTION

This permit is to revise Title V Air Operation Permit No. 0310028-019-AV by incorporating the terms and conditions of Air Construction Permit No. 0310028-023-AC. Additionally, two (2) new emissions units were created for three (3) emergency stationary compression ignition reciprocating internal combustion engines (RICE).

RELATED DOCUMENTS

Title V Air Operation Permit No. 0310028-019-AV
Title V Air Construction Permit No. 0310028-023-AC
Title V Administrative Correction No. 0310028-021-AV
Additional information requested December 30, 2011
Additional information received March 20, 2012
Application for a Title V Air Operation Permit Revision received November 1, 2011

PRIMARY REGULATORY REQUIREMENTS

NuStar Terminals Operations Partnership, L.P., Jacksonville Terminal is classified as a Title V source because potential emissions of one or more individual criteria pollutants is equal to or greater than 100 tons per year in accordance with Chapter 62-210, FAC, and Rule 2.301 JEPB.

Based on the Title V Air Operation Permit Revision application received November 1, 2011, this facility is classified as a synthetic non-Title V source for Hazardous Air Pollutants (HAPs) because the potential emissions of any single HAP is limited to less than 10 tons per year and the potential emissions of total HAPs is limited to less than 25 tons per year in accordance with Chapter 62-210, FAC, and Rule 2.301 JEPB.

The new hot water boiler, EU045 is exempt from 40 CFR 63, Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources because it is a "gas-fired" boiler.

The emergency stationary compression ignition RICE are subject to 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63, Subpart A, 40 CFR 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, and 40 CFR 60, Subpart A, General Provisions.

Emissions Unit Nos. 023 and 034 are subject to Compliance Assurance Monitoring (CAM) requirements.

The control technology description and monitoring approach for each emissions unit subject to CAM is the same and summarized as follows:

VOC emissions are controlled by a vapor combustor unit (VCU). The effectiveness of the VCU is evaluated by monitoring the presence of flame using an ultraviolet flame detector (UFD). The UFD operates continuously, when the VCU is operating. Additionally, the tightness of the connection of the vapor return line to the tanker truck is also monitored. A tight connection of the vapor recovery line must occur, otherwise the automation system will not allow loading.

PROJECT REVIEW

This project revises Title V Air Operation Permit No. 0310028-019-AV by incorporating the terms and conditions of Air Construction Permit No. 0310028-023-AC. Additionally, changes in the descriptions and specific conditions for EU Nos. 042, 044 and 045 were included. Also, two (2) new emissions units were created for three (3) emergency stationary compression ignition RICE.

The following changes were incorporated:

1. EU 035 (Hot Water Boiler) was removed from the permit.

2. The terms and conditions of EU 045 were added to the permit.

3. Added specific conditions for EU 044 and EU 045 stating that these EUs burn No. 2 fuel oil only as a back-up fuel during periods of natural gas curtailment, gas supply emergencies or periodic testing on liquid fuels. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

4. The EU description for EU 042 was changed. The tank listed as 6001 was corrected and changed to tank number 6701.

5. Two new emissions units (EU Nos. 046 and 047) were created for three emergency stationary compression ignition RICE and added to the permit.

CONCLUSION

This project revises Title V Air Operation Permit No. 0310028-019-AV, which was issued on August 26, 2011. This Title V Air Operation Permit Revision 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 62-213and 214. 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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