CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Mike Lalli
Terminal Manager
BP Products North America, Inc.
P.O. Box 26038
Jacksonville, FL 32226

Re: DUVAL COUNTY AIR POLLUTION
BP Products North America, Inc.
PROPOSED Permit No.: 0310179-014-AV
Initial Title V Air Operation Permit

Dear Mr. Lalli:

One copy of the "PROPOSED DETERMINATION" for the Initial Title V Air Operation Permit for BP Products North America, Inc. located at 2101 Zoo Parkway, Jacksonville, Duval County, FL 32226 is enclosed. This letter is only a courtesy to inform you that the DRAFT Permit has become a PROPOSED Permit.

An electronic version of this determination has been posted on the Division of Air Resources Management's worldwide web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is:

http://www.dep.state.fl.us/air/emission/apds/default.asp

Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the PROPOSED Permit is made by the USEPA within 45 days, the PROPOSED Permit will become a FINAL Permit no later than 55 days after the date on which the PROPOSED Permit was mailed (posted) to USEPA. If USEPA has an objection to the PROPOSED Permit, the FINAL Permit will not be issued until the Permitting Authority receives written notice that the objection is resolved or withdrawn.

If you should have any questions, please contact Mr. Harry D. Smith at (904) 255-7196.

Sincerely,

_____
Richard L. Robinson, P.E., Manager
Air Pollution Source Permitting Section

RLR/HDS

Enclosures

CERTIFICATE OF SERVICE

The undersigned duly designated Permitting Authority clerk hereby certifies that this PROPOSED TITLE V AIR OPERATION PERMIT (including the PROPOSED DETERMINATION) and all copies were sent by U.S. mail before the close of business on _____ to the person(s) listed:

Mr. Mike Lalli, Terminal Manager
BP Products North America, Inc.

In addition, the undersigned duly designated Permitting Authority clerk hereby certifies that notification of access to this PROPOSED TITLE V AIR OPERATION PERMIT (including the PROPOSED DETERMINATION) were sent by e-mail to the person(s) listed:

Mr. Robert A. Baker, P.E. (baker@atlantic.net)
Mr. Radford Murphy, BP Products North America, Inc. (RadfordMurphy@bp.com)
Ms. Barbara Friday, BAR [barbara.friday@dep.state.fl.us] (for posting with Region 4, U.S. EPA)
Ms. Rita Felton-Smith, District Air Program Permitting, DEP/NED (Rita.Felton-Smith@dep.state.fl.us)

FILING AND ACKNOWLEDGMENT

FILED, on this date, pursuant to Section 120.52(7), Florida Statutes, with the designated Permitting Authority Clerk, receipt of which is hereby acknowledged.

_____ _____
(Clerk) (Date)

PROPOSED PERMIT DETERMINATION

PROPOSED Permit No.: 0310179-014-AV
Initial Title V Air Operation Permit

I. Public Notice.

An "INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" to BP Products North America, Inc. located at 2101 Zoo Parkway, Jacksonville, Duval County, FL 32226 was clerked on September 15, 2011. The "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" was published in the Florida Times-Union on October 6, 2011. The DRAFT Permit was available for public inspection at the City of Jacksonville, Environmental and Compliance Department, Environmental Quality Division's Permitting Authority's office in Jacksonville, FL. Proof of publication of the "PUBLIC NOTICE OF INTENT TO ISSUE A TITLE V AIR OPERATION PERMIT" was received on October 24, 2011. .

II. Public Comment(s)

Comments were received and the DRAFT Permit was changed. The comments were not considered significant enough to reissue the DRAFT Permit and require another Public Notice. Comments were received from one respondent (the applicant) during the 30 (thirty) day public comment period. Listed below is the comment letter and a response to each comment in the order that the comments were received. The comment(s) will not be restated. Where duplicative comments exist, the original response is referenced.

A. Comments: Letter from Mr. Robert A. Baker, P.E., Baker Environmental Engineering, Inc. dated October 4, 2011 and received October 7, 2011.

1. Response: As a result, of this request the following statements have been added to **Section I. Facility Information, Subsection A. Facility Description:**

New Emission Unit No. 031, Petroleum Contact Water (PCW) Tanks has been created and placed in Appendix U-1, List of Unregulated Emission Units and/or Activities. Tank Nos. 152 and 153 were originally under Emission Unit No. 021 and Tank B was originally under Emission Unit No. 029 in Construction Permit No. 0310179-013-AC. The PCW is comprised of spills and stormwater at the truck loading racks, wastewater from internal tank cleanings and tank water draws from the gasoline and distillate storage tanks. The PCW tanks have been renamed as follows: Petroleum Contact Water Tank No. 150 has been renamed Tank No. 152 and Petroleum Contact Water Tank No. 151 has been renamed Tank No. 153. Emission Unit Nos. 021 and 029 no longer exist. The miscellaneous tanks that were under Emission Units Nos. 021 and 029 are listed in Appendix I-1, List of Insignificant Emissions Units and/or Activities.

New Emission Unit No. 032, Emergency Diesel Engines, has been created and added to this permit. The engines are listed below.

Description of Engine
250 KW Cummins Emergency Generator
500 KW Cummins Emergency Generator
800 KW Cummins Emergency Generator
175 HP Clarke Fire Pump

2. **Response:** As a result of this request, **Section III. Emission Units and Conditions**, **Emission Unit No. 19** is hereby changed as follows:

   From: Emission Unit Description: Tanks Nos. 102 – 105 and Tank Nos. 109 – 112. Tank Nos. 102 (625,380 Gallons), Tank 103 (625,380 Gallons), Tank 104 (625,380 Gallons), Tank 105 (1,041,600 Gallons), Tank 109 (3,339,000 Gallons), Tank 110 (1,879,920 Gallons), Tank 111 (5,227,320 Gallons), and Tank 112 (5,226,900 Gallons) - Gasoline, aviation gasoline, denatured ethanol, or lower vapor pressure VOL products.

   To: Emission Unit Description: Tanks Nos. 102 – 105 and Tank Nos. 109 – 112. Tank Nos. 102 (625,380 Gallons), Tank 103 (625,380 Gallons), Tank 104 (625,380 Gallons), Tank 105 (1,041,600 Gallons), Tank 109 (3,339,000 Gallons), Tank 110 (1,879,920 Gallons), Tank 111 (5,227,320 Gallons), and Tank 112 (5,226,900 Gallons) for the storage of gasoline, aviation gasoline, denatured ethanol, **and/or gasoline/denatured ethanol blends** or lower vapor pressure VOL products.

3. **Response:** As a result of this statement**,** those tank volumes under **Section III. Emission Units and Conditions** which were found to be the safe fill capacity were changed to reflect the gross capacities of the tanks. The following statement was added to this section:

   Note: The volumes of all tanks are the gross capacities of the tanks.

4. **Response:** The Permitting Authority does not agree with the request for a change in the rule citation for **Specific Condition No. 7** under **Section III. Emission Units and Conditions, Emission Unit No. 011.** The rule citation is correct.

5. **Response:** **Section III. Emission Units and Conditions**, **Emission Unit No. 011, Specific Condition No. 8** requires notification within 30 days when the maximum true vapor pressure of the liquid exceeds the maximum true vapor pressure value of 5.2 kilo pascals (kPa). Notification is not required when refilling a storage vessel with ethanol which previously contained gasoline or vice versa since the true vapor pressure of both liquids exceeds 5.2 kPa. Notification is required when refilling a storage vessel with either ethanol or gasoline if the storage vessel previously contained diesel since the vapor pressures of diesel is less than 5.2 kPa.

6. **Response:** As a result of this request, the following footnote has been added to the table with the diesel engines under **Section III. Emission Units and Conditions, Emission Unit No. 32:**

   The 500 KW Cummins Emergency Engine is rated at 755 HP. This converts to 563 KW for use in determining allowable emissions for that engine.

7. **Response:** As a result of this request, the emission limits for the 175 HP Clarke Fire Pump are hereby changed as follows:

   From:

Engine	Non-Methane Hydrocarbon + NO_x	CO	PM
250 KW Cummins Emergency Generator	4.0 Grams/HP-Hr	3.5 Grams/HP-Hr	0.20 Grams/HP-Hr
500 KW Cummins Emergency Generator	6.4 Grams/HP-Hr	3.5 Grams/HP-Hr	0.20 Grams/HP-Hr
800 KW Cummins Emergency Generator	6.4 Grams/HP-Hr	3.5 Grams/HP-Hr	0.20 Grams/HP-Hr
Clarke Fire Pump	5.45 Grams/HP-Hr	0.34 Grams/HP-Hr	0.17 Grams/HP-Hr

To:

Engine	Non-Methane Hydrocarbon + NO_x	CO	PM
250 KW Cummins Emergency Generator	4.0 Grams/kW-Hr	3.5 Grams/kW-Hr	0.20 Grams/kW-Hr
500 KW Cummins Emergency Generator	6.4 Grams/kW-Hr	3.5 Grams/kW-Hr	0.20 Grams/kW-Hr
800 KW Cummins Emergency Generator	6.4 Grams/kW-Hr	3.5 Grams/kW-Hr	0.20 Grams/kW-Hr
175 HP (130.5 KW) Clarke Fire Pump	10.5 Grams/kW-Hr	3.5 Grams/kW-Hr	0.54 Grams/kW-Hr

Note: The units have been corrected to indicate kW-Hr and the correct standards for the Clarke Fire Pump have been added. In addition, the 175 HP rating of the Clarke Fire Pump has been added.

8. Response: As a result of this comment, Tank No. 16 with an emergency generator has been removed from **Appendix I-1 List of Insignificant Emission Units and/or Activities.** The tank and emergency generator are owned by Pipeline Transportation, Inc., a tenant on the property of BP Products North America. BP Products of North America, Inc. and Pipeline Transportation, Inc. are under separate ownership. Pipeline Transportation is not under the direct control of BP North America, Inc. and does not support any activities of BP Products North America, Inc.

9. Response: As a result of this comment**,** an EQD inspector visited BP Products North America, Inc. on November 3, 2011 and verified Tank No. 122 had been removed. This tank has been deleted from **Appendix I-1 List of Insignificant Emission Units and/or Activities**.

10. Response: As a result of this request, **Table 1-1 Summary of Air Pollutants Standards and Terms** is hereby changed as follows:

a. The emissions from Emission Unit No. 011 incorrectly included the emissions from Tank No. 108. The emissions from Tank No. 108 have been subtracted from Emission Unit No. 011 for a total of 13.15 tons of VOCs per year. Tank No. 108 was moved to Emission Unit No. 020 since the internal floating roof for this tank had not been constructed.

b. The emissions from Tank No. 108 (0.52 tons of VOCs per year) were added to the emissions of Emission Unit No. 020 (4.17 tons of VOCs per year) for a total of 4.69 tons of VOCs per year.

c. A correction of the emissions for Emission Unit No. 030 was made. The correct emissions were calculated to be 37.73 tons/yr.

d. A footnote was added to the table to indicate that the 18.35 tons/yr of NO_x is based on using 64,000 gallons of diesel fuel and AP 42 emission factors for industrial diesel engines.

e. A footnote was added to the table to indicate that the potential emissions from Emission Unit No. 031 totals 9.26 tons of VOCs per year.

f. A footnote was added to the table to indicate that the potential emissions from the miscellaneous tanks totals 1.64 tons of VOCs per year.

B. Comments: Email from Mr. Robert A. Baker, P.E., Baker Environmental Engineering, Inc. dated November 22, 2011.

11. Response: As a result of this request, **Appendix CAM, Option 3 – Only While the VCU is Operating, Indicator No. 4, III. Performance Criteria, B. and E. are** hereby changed as follows:

From:

B. Verification of Operational Status	Continuous recorder.
E. Data Collection Procedures	Signal from the pilot flame detector goes to continuous recorder along with each corresponding truck loading operation.

To:

B. Verification of Operational Status	Interlock to prevent flow of vapors to the VCU if a flame is not detected.
E. Data Collection Procedures	Signal from the pilot flame detector goes to an interlock which will shut down the bladder tank's fan if there is no flame.

In addition to the above changes, the Permitting Authority has made the following changes to the draft permit:

The heading titled **Monitoring Requirements** has been added under **Section III. Emission Units and Conditions, Emission Unit No. 32. Specific Condition Nos. 4, 5 and 6** have been moved under **Monitoring Requirements**.

The State and Local rule citations have been added to **Section III. Emission Units and Conditions, Emission Unit No. 32, Specific Condition Nos. 3, 4, 5, 6 and 7.**

Section III. Emission Units and Conditions, Emission Unit No. 32, Specific Condition No. 7 has been moved from **Emission Limitations and Standards** to **Recordkeeping and Reporting Requirements.**

Tank No. 12 with Emergency Generator, Tanks No. 13 with Emergency Generator, Tank No. 14 with Emergency Generator and Tank No. 15 with Clarke Fire Pump have been removed from Appendix I-1, List of Insignificant Emissions Units and/or Activities since they are already under Emission Unit No. 032, Emergency Diesel Engines.

III. Conclusion

The Permitting Authority hereby issues the PROPOSED Permit, with the changes noted above.