BP Products North America, Inc.
Tank No. 3, Emission Unit No. 027, Terminal B
Facility ID No.: 0310179
Duval County

Air Construction Permit
Draft Permit No.: 0310179-018-AC

Permitting & Compliance Authority:
Neighborhoods Department
Environmental Quality Division
Ed Ball Building, 214 North Hogan Street, 7th Floor
Jacksonville, FL 32202
Telephone: (904) 255-7100
FAX: (904) 588-0518

Air Construction Permit

DRAFT Permit No.: 0310179-018-AC

Table of Contents

Section **Page Number**

Placard Page ……...1

I. Facility Information…….. 2

A. Facility/Project Description.
B. Summary of Emissions Unit ID No(s). and Brief Description(s).
C. Relevant Documents.

II. Facility-wide Conditions ……..3 - 7

III. Emissions Unit(s) and Conditions ……...7 - 8

Permittee:
BP Products North America, Inc.
2101 Zoo Parkway
Jacksonville, FL 32218

Permit No.: 0310179-018-AC
Facility ID No.: 0310179
SIC No(s).: 51
Project: Tank No. 3, Emission Unit No. 027, Terminal B

The purpose of this Air Construction Permit is to replace the internal floating roof of Tank No. 3, Emission Unit No. 027, Terminal B. BP Products of North America, Inc. is a bulk petroleum products storage and distribution terminal. This facility is located at 2101 Zoo Parkway, Jacksonville, Duval County, FL 32218; UTM Coordinates: Zone 17, 441.800 km East and 3364.630 km North; Latitude: 30° 24' 50" North and Longitude: 81° 36' 21" West.

This permit is issued under the provisions of Chapter 403, Florida Statutes (FS) and Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297, Florida Administrative Code (FAC). 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 Neighborhoods Department, Environmental Quality Division (Permitting Authority) in accordance with the terms and conditions of this permit.

***Title V Air Operation Permit Application Due Date:**
Expiration Date:

Neighborhoods Department
Environmental Quality Division

_____
Robert Steven Pace, P.E., Manager
Air Quality Branch

RSP/HDS

***Note: See Section II. Facility Wide Conditions, Subsection B. Specific Condition 7**

Section I. Facility Information

Subsection A. Facility/Project Description

This purpose of this Air Construction Permit is to replace the internal floating roof of Tank No. 3, Emission Unit No. 027, Terminal B.

BP Products North America, Inc. is a bulk petroleum products storage and distribution terminal. Petroleum products (gasoline, diesel fuel, kerosene, 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, jet fuel or lower vapor pressure VOL products are then loaded into tanker trucks at one of the two tank truck loading rack systems. Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP) 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.

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(189), FAC, and Rule 2.301, Jacksonville Environmental Protection Board (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(189), 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(189), FAC, and Rule 2.301, Jacksonville Environmental Protection Board (JEPB).

The maximum throughput shall not exceed 450.0 x 10^6 gallons per year of gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blends (12 month rolling total) and 260.0 x 10^6 gallons per year of kerosene distillate oil (12 month rolling total). The petroleum product throughput, the potential and allowable emissions of hazardous air pollutants (HAP) are restricted to less than 10 TPY for any single HAP and to less than 25 TPY for total HAP(s). TPY shall be designated as any 12 consecutive month period.

The facility is a major source of air pollution because the potential emissions of regulated air pollutants (VOCs) are greater than 100 tons per year pursuant to Chapter 62-210, FAC, and Rule 2.301, Jacksonville Environmental Protection Board (JEPB).

Based upon the Title V permit application received on May 24, 2012 this facility is not a major source of hazardous air pollutants (HAPs).

Subsection B. Summary of Emission Unit (EU) ID Nos. and Brief Descriptions

EU No.	EU Description, Terminal B	Control Device
027	Petroleum/Denatured Ethanol Storage Tank No.3 [RACT]	Tank No. 3 - Internal Floating Roof with mechanical shoe primary seal and secondary wiper seal

Subsection C. Relevant documents

Air Operation No. 0310179-014-AV

Section II. Facility Wide Conditions

Subsection A. General Conditions

1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, FS. The permittee is placed on notice that the Permitting Authority will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific process and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Permitting Authority.

3. As provided in subsections 403.087(6) and 403.722(5), FS, the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Permitting Authority rules, unless specifically authorized by an order from the Permitting Authority.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, as required by Permitting Authority rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Permitting Authority rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Permitting Authority personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

   a. Have access to and copy any records that must be kept under conditions of the permit;
   b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
   c. Sample or monitor any substances or parameters at any location reasonably necessary to assure compliance with this permit or Permitting Authority rules.

   Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Permitting Authority with the following information:

   a. A description of and cause of noncompliance; and

b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Permitting Authority for penalties or revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Permitting Authority may be used by the Permitting Authority as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Permitting Authority rules, except where such use is prescribed by Sections 403.111 and 403.73, FS. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Permitting Authority rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Permitting Authority rules.

11. This permit is transferable only upon Permitting Authority approval in accordance with Rules 62-4.120 and 62-730.300, FAC, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Permitting Authority.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes:

( ) Determination of Best Available Control Technology (BACT)
( ) Determination of Prevention of Significant Deterioration (PSD)
( ) Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
(X) Compliance with New Source Performance Standards

14. The permittee shall comply with the following:

a. Upon request, the permittee shall furnish all records and plans required under Permitting Authority rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Permitting Authority.
b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by this permit, copies of all reports required by this permit, and records of all data used to complete the application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Permitting Authority rule.
c. Records of monitoring information shall include:
   1. The date, exact place, and time of sampling or measurements;
   2. The person responsible for performing the sampling or measurements;
   3. The date(s) analyses were performed;
   4. The person responsible for performing the analyses;
   5. The analytical techniques or methods used;
   6. The results of such analyses.

15. When requested by the Permitting Authority, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee

becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Permitting Authority, such facts or information shall be corrected promptly.
[Rule 62-4.160, FAC, and Rule 2.1401, JEPB]

Subsection B. Specific Conditions

1. Any revision(s) to a permit (and application) shall be submitted to and approved by the Permitting Authority prior to implementing.
[Rule 62-4.080(2), FAC, and Rule 2.1401, JEPB]

2. Permittee shall submit an annual operation report to the Permitting Authority for this (these) emission unit(s) on the form(s) supplied for each calendar year on or before April 1 of the following year.
[Rule 62-210.370(3), FAC and Rule 2.301, JEPB]

3. A permittee may request that a permit be extended as a modification of the permit. Such a request must be submitted to the Permitting Authority in writing before the expiration of the permit.
[Rule 62-4.080(3), FAC and Rule 2.1401, JEPB]

4. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emission or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Permitting Authority.
[Rule 62-296.320(1)(a), FAC, and Rule 2.1101, JEPB]

5. Special Compliance Tests: When the Permitting Authority, after investigation, has good reason (such as complaints, increased visible emissions or questionable maintenance of control equipment) to believe that any applicable emission standard contained in a Permitting Authority rule or in a permit issued pursuant to those rules is being violated, it shall require the owner or operator of the emissions unit to conduct compliance tests which identify the nature and quantity of pollutant emissions from the emissions unit and to provide a report on the results of said tests to the Permitting Authority.
[Rule 62-297.310(7), FAC and Rule 2.1201, JEPB]

6. Modifications: No new emissions unit shall be constructed and no existing emissions unit shall be modified without obtaining an air construction permit from the Permitting Authority. Such permit shall be obtained prior to beginning construction or modification.
[Rule 62-210.300(1), FAC, Rule 62-212.300(1)(a), FAC, Rule 2.301, JEPB, and Rule 2.401, JEPB]

7. To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for a Title V Air Operating Permit with compliance records and test results, to the Permitting Authority, at least 90 days prior to the expiration date of the construction permit but no later than 180 days after commencing operation.
[Rule 62-213.420(1)(a), FAC and Rule 2.501, JEPB]

8. Plant Operation - Problems: If temporarily unable to comply with any of the conditions of the permit due to breakdown of equipment or destruction by fire, wind or other cause, the permittee shall notify each Compliance Authority as soon as possible, but at least within one working day, excluding weekends and holidays. The notification shall include: pertinent information as to the cause of the problem; steps being taken to correct the problem and prevent future recurrence; and, where applicable, the owner's intent toward reconstruction of destroyed facilities. Such notification does not release the permittee from any liability for failure to comply with the conditions of this permit or the regulations.
[Rule 62-4.130, FAC and Rule 2.1401, JEPB]

9. Circumvention: The permittee shall not circumvent the air pollution control equipment or allow the emission of air pollutants without this equipment operating properly.
[Rule 62-210.650, FAC and Rule 2.301, JEPB]

10. Source Obligation:

    a. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by virtue of a relaxation in any enforceable limitation which was established after August 7, 1980, on the capacity of the source or modification otherwise to emit a pollutant, such as a restriction on hours of operation, then the requirements of subsections 62-212.400(4) through (12), FAC, shall apply to the source or modification as though construction had not yet commenced on the source or modification.

    b. At such time that a particular source or modification becomes a major stationary source or major modification (as these terms were defined at the time the source obtained the enforceable limitation) solely by exceeding its projected actual emissions, then the requirements of subsections 62-212.400(4) through (12), FAC., shall apply to the source or modification as though construction had not yet commenced on the source or modification.

    [Rule 62-212.400(12), FAC and Rule 2.401, JEPB]

11. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, GA 30303-8960
Telephone: (404) 562-9155
Fax: (404) 562-9163

12. The maximum throughput shall not exceed 450.0 x 10^6 gallons per year of gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blends (12 month rolling total) and 260.0 x 10^6 gallons per year of kerosene distillate oil (12 month rolling total).
[Applicant's Request, Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

13. By restricting petroleum product throughput, the potential and allowable emissions of hazardous air pollutants (HAP) are restricted to less than 10 TPY for any single HAP and to less than 25 TPY for total HAP(s). TPY shall be designated as any 12 consecutive month period. Monthly records of petroleum product throughput shall be maintained for a minimum period of five (5) years and shall be provided to the Permitting Authority upon request.
[Rule 62-210.200(PTE), FAC, Rule 2.301, JEPB, and Applicants Request]

14. The permittee shall submit all compliance related notifications and reports required by this permit to:

Neighborhoods Department
Environmental Quality Division
Ed Ball Building, 214 North Hogan Street, 7th Floor

Jacksonville, FL 32202
Telephone: (904) 255-7100
Fax: (904) 588-0518

The following Facility-wide conditions are not federally enforceable

15. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor. [Rule 62-296.320(2), FAC, and Rule 2.1101, JEPB]

16. The facility shall be subject to the City of Jacksonville Ordinance Code, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 376 [Odor Control], and JEPB Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice].

17. The facility shall be subject to JEPB Rule 2, Parts I through VII, and Parts IX through XIV.

Section III. Emission Units and Conditions

Emission Unit No. 027 - Terminal B, Petroleum Storage Tank Nos. 2, 3, and 4 [RACT]

Emission Unit Description: Tank No. 2 (1,276,800 gallons), Tank No. 3 (2,492,238 gallons), and Tank No. 4 (2,490,600 gallons) for the storage of gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blend, or lower vapor pressure VOL products.

Note: This permit is for the replacement of the internal floating roof for Tank No. 3 only.

Control Device Description: Internal floating roofs

Essential Potential to Emit (PTE) Parameters

1. This EU shall be allowed to operate continuously, i.e., 8,760 hrs/yr.
[Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Emission Limitations, Standards and Operating Requirements

2. 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 shall apply to the source described herein. (**Permitting Note: The owner or operator shall comply with the requirements of 40 CFR 63, Subpart BBBBBB by the applicable dates specified in 40 CFR 63.11083.)**
[40 CFR 63, Subpart BBBBBB, Rule 62-204.800(11), FAC, and Rule 2.201, JEPB]

3. 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] shall apply to this emission unit.

4. The owner or operator of these storage vessels shall comply with each emission limit and management practice in Table 1 of 40 CFR 63 Subpart BBBBBB that applies to this emissions unit.

[40 CFR 63.11087(a), Rule 62-204.800(11), FAC, and Rule 2.201, JEPB]

5. Operation and Maintenance of Equipment. At all times the owner or operator shall operate and maintain the petroleum/ethanol storage tank including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Permitting Authority which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
[40 CFR 63.11085(a), Rule 62-204.800(11), FAC and Rule 2.201, JEPB]

Testing and Monitoring

6. The owner or operator of these storage vessels shall comply with the applicable leak inspections testing and monitoring requirements specified in 40 CFR 63.11092(e).
[40 CFR 63.11087(c), Rule 62-204.800(11), FAC, and Rule 2.201, JEPB]

Record-keeping and Reporting Requirements

7. Applicable notifications shall be submitted as required by 40 CFR 63.11093.
[40 CFR 63.11087(d), Rule 62-204.800(11), FAC, and Rule 2.201, JEPB]

8. Records shall be maintained and reports submitted as specified in 40 CFR 63.11094 and 40 CFR 63.11095.
[40 CFR 63.11087(e), Rule 62-204.800(11), FAC, and Rule 2.201, JEPB]

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