FINAL DETERMINATION

I. GENERAL INFORMATION

A. APPLICANT

Jaxbulk Terminal, LLC
1301 Wigmore Street
Jacksonville, FL 32206

Final Permit No: 0310574-001-AC
County: Duval

B. PROJECT

The applicant, Jaxbulk Terminal, LLC, applied on June 23, 2011, to the Permitting Authority for a permit to construct a new ethanol handling and distribution facility. The construction includes the retrofitting of 6 existing fixed roof storage tanks to internal floating roof tanks, the installation of a three bay loading rack for trucks, and a loading arm for barges. Emissions from the loading of the denatured ethanol into trucks and/or barges will be controlled by a vapor combustion unit (VCU). The six storage tanks are approximately 101 feet in diameter with a total storage capacity of approximately 13.86 million gallons (2.31 million gallons each). Denatured ethanol (98% ethanol and 2% gasoline), will be delivered by railcar at up to one unit train (100 cars) per day. The maximum potential quantity of material delivered to the site is approximately 1,095 million gallons per year. Product blending will not be performed on site.

Jaxbulk Terminal, LLC is located at 1301Wigmore Street, Jacksonville FL 32206. The facility shall emit the air pollutants particulate matter, particulate matter equal to or less than 10 microns in aerodynamic diameter, volatile organic compounds, oxides of nitrogen, carbon monoxide, and sulfur dioxide.

II. FINAL DETERMINATION

The Technical Evaluation and Preliminary Determination for the project described above was distributed on October 7, 2011. The Notice of Intent to Issue was published in the Financial News & Daily Record on October 19, 2011

Copies of the evaluation were available for public inspection at the Environmental and Compliance Department, Environmental Quality Division (Permitting Authority), and the Department of Environmental Protection, Northeast District office.

The only comments received on the Public Notice of Intent to Issue during the 30 (thirty) day public comment period was from the applicant. The comments were not considered significant enough to reissue the DRAFT Permit and require another Public Notice. The comments were received by electronic mail from Thomas C. Emenhiser, HSA Engineers & Scientists on October 28, 2011. Listed below is each comment, a response to each comment, and the changes made.

Comment 1: *"Unloading"* is referred to in the description of the facility/project. *"Loading"* is the correct terminology that should be used in describing this operation.

Response 1: This change is acceptable to the Permitting Authority. The changes will be made as noted below.

Section I., Subsection A. Facility/Project Description of the permit shall be revised as follows:

From: This permit is for the construction of a new ethanol handling and distribution terminal for Jaxbulk Terminal, LLC. The project includes the retrofitting of six (6) existing fixed roof storage tanks to internal floating roof tanks; the installation of a three (3) bay unloading rack for trucks and an unloading arm for barges. Emissions from the unloading of the denatured ethanol into trucks and/or barges will be controlled by a vapor combustion unit (VCU).

To: This permit is for the construction of a new ethanol handling and distribution terminal for Jaxbulk Terminal, LLC. The project includes the retrofitting of six (6) existing fixed roof storage tanks to internal floating roof tanks; the installation of a three (3) bay loading rack for trucks and a loading arm for barges. Emissions from the loading of the denatured ethanol into trucks and/or barges will be controlled by a vapor combustion unit (VCU).

The Technical Evaluation and Preliminary Determination, Section I., Subsection B. Project shall be revised as follows:

From: On June 23, 2011, Jaxbulk Terminal, LLC applied to the Permitting Authority for a permit to construct a new ethanol handling and distribution facility. The construction includes the retrofitting of 6 existing fixed roof storage tanks to internal floating roof tanks, the installation of a three bay unloading rack for trucks, and an unloading arm for barges. Emissions from the unloading of the denatured ethanol into trucks and/or barges will be controlled by a vapor combustion unit (VCU). Jaxbulk Terminal, LLC is located at 1301Wigmore Street, Jacksonville FL 32206.

To: On June 23, 2011, Jaxbulk Terminal, LLC applied to the Permitting Authority for a permit to construct a new ethanol handling and distribution facility. The construction includes the retrofitting of 6 existing fixed roof storage tanks to internal floating roof tanks, the installation of a three bay loading rack for trucks, and a loading arm for barges. Emissions from the loading of the denatured ethanol into trucks and/or barges will be controlled by a vapor combustion unit (VCU). Jaxbulk Terminal, LLC is located at 1301Wigmore Street, Jacksonville FL 32206.

Comment 2: The six storage tanks are equipped with a containment area, but it is not for each individual tank. Please delete this statement.

Response 2: As a result of this comment, the following changes will be made to **Section 1., Subsection A. Facility/Project Description** and to the **Technical Evaluation and Preliminary Determination, Section I., Subsection B. Project.**

From: The six storage tanks are approximately 101 feet in diameter with a total storage capacity of approximately 13.86 million gallons (2.31 million gallons each). Denatured ethanol (98% ethanol and 2% gasoline), will be delivered by railcar at up to one unit train (100 cars) per day. The maximum potential quantity of material delivered to the site is approximately 1,095 million gallons per year. The tanks will each be located within individual containment areas. Product blending will not be performed on site.

To: The six storage tanks are approximately 101 feet in diameter with a total storage capacity of approximately 13.86 million gallons (2.31 million gallons each). Denatured ethanol (98% ethanol and 2% gasoline), will be delivered by railcar at up to one unit train (100 cars) per day. The maximum potential quantity of material delivered to the site is approximately 1,095 million gallons per year. Product blending will not be performed on site.

Comment 3: There is a timing conflict with the submittal of the application for the operation permit as stated in the facility wide conditions and with the initial compliance testing for Emissions Unit No. 002.

Response 3: The Permitting Authority agrees with this comment and the following change will be made to **Section II, Subsection B., specific condition no. 7:**

From: To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an Air Operation Permit. The permittee shall submit the application fee, along with compliance records and test results, to the Department ninety (90) days prior to the expiration date of the construction permit but no later than 90 days after completion of construction, whichever occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate.

To: To obtain a permit to operate, the permittee must demonstrate compliance with the conditions of the construction permit and submit a complete application for an Air Operation Permit. The permittee shall submit the application fee, along with compliance records and test results, to the Department ninety (90) days prior to the expiration date of the construction permit but no later than 90 days after completion of the compliance test, whichever occurs first. The permittee may continue to operate in compliance with all terms of the construction permit until its expiration date. Operation beyond the construction permit expiration date requires a valid permit to operate.

Comment 4: The applicant requested that additional throughput rates be added for clarification.

Response 4: The Permitting Authority agrees with the comment. **Section III., Emissions Unit No. 002, specific condition no. 2** will be changed as follows:

From: The maximum throughput rate shall not exceed 1,095 million gallons per year of denatured ethanol.

To: The maximum throughput rate shall not exceed 1,095 million gallons per year of denatured ethanol (with an instantaneous rate of 5,000 barrels per hour for barge loading and 72,000 gallons per hour for the total of all three truck loading bays).

III. CONCLUSION

The final action of the Permitting Authority will be to issue permit no. 0310574-001-AC as proposed in the Technical Evaluation and Preliminary Determination, with the changes mentioned above.