

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

I. GENERAL INFORMATION

A. APPLICANT

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

Draft Permit No. 0310179-008-AC
County: Duval

B. PROJECT

On January 2, 2008, BP Products North America, Inc., submitted an application for a permit to construct blending equipment and related piping equipment for denatured ethanol blending with gasoline, the addition of denatured ethanol as an allowable product in existing floating roof tanks, the addition of gasoline/denatured ethanol blends at the loading rack(s), the addition of a skid to offload denatured ethanol tank trucks at Terminal A (near rail car unloading area) and the addition of an additional loading arm at Terminal A for the tank truck loading of denatured ethanol.

II. RULE APPLICABILITY

The facility is located in an area designated as attainment for the air pollutant sulfur dioxide (effective March 8, 1999), as unclassifiable for the air pollutant particulate matter less than or equal to ten (10) micrometers, and an air quality maintenance area for air pollutants particulate matter and ozone pursuant to Rule 62-204, Florida Administrative Code (FAC), and Rule 2.201, Jacksonville Environmental Protection Board (JEPB).

The facility is a synthetic minor source of air pollution because the operational limits assumed by the owner will limit the potential emissions of regulated air pollutants to less than 100 tons per year and the potential emissions of Hazardous Air Pollutants (HAP) to less than 10 tons per year for a single HAP and less than 25 tons per year for total HAPs pursuant to Rule 62-210.200(254), FAC, and Rule 2.301, JEPB.

The project shall be subject to the provisions of 40 CFR 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids, 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals, 40 CFR 60, Subpart A, General Provisions. The facility shall be subject to the following subpart: 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 applicable provisions of 40 CFR 63, Subpart A, General Provisions, Stationary Sources - Emission Standards, Reasonably Available Control Technology – Petroleum Liquid Storage, Rule 62-296.508, FAC, Bulk Gasoline Terminals, Rule 62-296.510, FAC, and JEPB Rule 2.1001, and General Pollutant Limiting Standards, Rule 62-296.320(2), FAC, Rule 2.1001, JEPB, and City of Jacksonville Ordinance Code, Chapter 376 limiting the emission of objectionable odors.

The above referenced Subpart BBBBBB was proposed on November 9, 2006 and was promulgated on January 10, 2008. All required reports, notifications, and correspondence should be sent to the Environmental Protection Agency **and** the Department (Environmental Quality Division) at the following addresses:

Environmental and Compliance Department
Environmental Quality Division
117 West Duval Street, Suite 225
Jacksonville, FL 32202
Telephone: (904) 630-4900
Fax: (904) 630-3638

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

All required reports, notifications, and correspondence should be mailed in accordance with the timelines and requirements specified in 40 CFR, Part 63, Subpart A and 40 CFR, Part 63, Subpart BBBBBB.

III. TECHNICAL EVALUATION

<u>EU No.</u>	<u>EU Description, Terminal A</u>	<u>Control Device</u>
011	Petroleum/Denatured Ethanol Storage Tank No. 113 [NSPS, Subpart Kb]	Internal Floating Roof

this Denatured Ethanol and gasoline/denatured ethanol blends have been added as additional storage products for tank.

<u>EU No.</u>	<u>EU Description, Terminal A</u>	<u>Control Device</u>
016	Tank Truck Loading System and Denatured Ethanol loading	Jordan Model JT-9078-85340-700 Carbon Adsorption/Absorption Vapor Recovery System Unit or J Callidus, Inc. Vapor Unit (Backup)
Combustion		

Gasoline/denatured ethanol blends have been added as an allowable throughput material for the loading rack. Denatured ethanol may also be loaded into tank trucks (using the new loading arm only).

<u>EU No.</u>	<u>EU Description, Terminal A</u>	<u>Control Device</u>
019	Petroleum/ Denatured Ethanol Storage Tank Nos. 102 through 105, and 109 through 112 [RACT]	Internal Floating Roofs

Denatured Ethanol and gasoline/denatured ethanol blends have been added as additional storage products for these tanks.

<u>EU No.</u>	<u>EU Description, Terminal B</u>	<u>Control Device</u>
024	Tank Truck Loading System	Jordan Model JT-9078-85340-700 Carbon Adsorption/Absorption Vapor Recovery Unit or Callidus, Inc. Vapor Unit (Backup)

Combustion

Gasoline/denatured ethanol blends have been added as an allowable throughput material for the loading rack.

<u>EU No.</u>	<u>EU Description, Terminal B</u>	<u>Control Device</u>
027	Petroleum/Denatured Ethanol Storage Tank Nos. 2, 3, and 4 [RACT]	Internal Floating Roofs

Denatured Ethanol and gasoline/denatured ethanol blends have been added as additional storage products for these tanks.

<u>EU No.</u>	<u>EU Description, Terminal B</u>	<u>Control Device</u>
028	Petroleum/Denatured Ethanol Storage Tank No. 5 [NSPS, Subpart Ka]	Internal Floating Roof

Denatured Ethanol and gasoline/denatured ethanol blends have been added as additional storage products for this tank.

IV. CONCLUSION

Based upon information provided by BP Products North America, Inc., the Department has reasonable assurance that the operation of the bulk fuels storage terminal, as described in this evaluation and subject to the conditions proposed herein, will not cause, or contribute to a violation of any ambient air quality standard or other technical provision of Chapters 62-296 and 62-297, FAC, JEPB Rules 2.1001 and 2.1101.