

ENVIRONMENTAL AND COMPLIANCE DEPARTMENT



Permittee:

BP Products North America, Inc.
1180 Spangler Road
Ft. Lauderdale, FL 33316

Draft Permit No.: 0310179-008-AC

Facility ID No.: 0310179

SIC No(s).: 51

Project: Jacksonville Terminals A and B

This permit is for the construction of 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. This facility is located at 2101 Zoo Parkway, Jacksonville, Duval County, FL 32226; 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 Florida Administrative Code (FAC) Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297. 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 Environmental and Compliance Department, Environmental Quality Division (Department) in accordance with the terms and conditions of this permit.

Revision Application Due Date:

Expiration Date:

**Environmental and Compliance Department
Environmental Quality Division**

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

RSP/RLR/jw

Environmental Quality Division

117 W. Duval Street, Suite 225 | Jacksonville, FL 32202 | Phone: 904.630.4900 | Fax: 904.630.3638 | www.coj.net

Section I. Facility Information

Subsection A. Facility/Project Description

This permit is for the construction of 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. Gasoline, other petroleum products, denatured ethanol, and denatured ethanol products are received from sea going vessels and railcar tankers, stored in fixed and floating roof storage tanks and dispensed through two tank truck loading rack systems.

VOC and TOC emissions from the loading of denatured ethanol and gasoline/denatured ethanol blends shall be controlled through a carbon adsorption/absorption vapor recovery unit and/or a vapor combustion unit.

The facility is a synthetic minor source of air pollution because the operational limit 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 (287), FAC, and Rule 2.301, JEPB.

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

| <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 |
| 016 | Tank Truck Loading System and Denatured Ethanol loading System | Jordan Model JT-9078-85340-700 Carbon Adsorption/Absorption Vapor Recovery Unit or J Callidus, Inc. Vapor Combustion Unit (Backup) |
| 019 | Petroleum/ Denatured Ethanol Storage Tank Nos. 102 through 105, and 109 through 112 [RACT] | Internal Floating Roofs |
| <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 Combustion Unit (Backup) |
| 027 | Petroleum/Denatured Ethanol Storage Tank Nos. 2, 3, and 4 [RACT] | Internal Floating Roofs |
| 028 | Petroleum/Denatured Ethanol Storage Tank No. 5 [NSPS, Subpart Ka] | Internal Floating Roof |

Subsection C. Relevant documents

Permit No.: 0310179-007-AF

Air construction permit application received January 2, 2008

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, Florida Statutes. The permittee is placed on notice that the Department 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 Department.
3. As provided in subsections 403.087(6) and 403.722(5), Florida Statutes, 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 Department rules, unless specifically authorized by an order from the Department.
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 Department 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 Department rules.
7. The permittee, by accepting this permit, specifically agrees to allow authorized Department 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 Department 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 Department 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 Department 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 Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Sections 403.111 and 403.73, Florida Statutes. 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 Department 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 Department rules.
 11. This permit is transferable only upon Department 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 Department.
 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
 - () Compliance with National Emissions Standards for Hazardous Air Pollutants
 14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - 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 Department 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 Department, 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 Department, such facts or information shall be corrected promptly.

[Rule 62-4.160, FAC, and Rule 2.1301, Jacksonville Environmental Protection Board (JEPB)]

Subsection B. Specific Conditions

1. Any revision(s) to a permit (and application) shall be submitted to and approved by the Department prior to implementing.
[Rule 62-4.080(2), FAC, and Rule 2.1301, JEPB.]
2. Permittee shall submit an annual operation report to the Department for this (these) emission unit(s) on the form(s) supplied for each calendar year on or before March 1.
[Rule 62-210.370(3), FAC, and Rule 2.301, JEPB.]
3. The construction/modification shall reasonably conform to the plans and schedule submitted in the application. If the permittee is unable to complete construction on schedule, the Department must be notified in writing sixty (60) days prior to the expiration of the construction permit. A new schedule and request for an extension of the construction permit must be submitted.
[Rule 62-4.080(2), FAC, and Rule 2.1301, JEPB]
4. To obtain a permit to operate, the permittee must submit a complete application for an Air Operating Permit to the Department, at least ninety (90) days prior to the expiration date of the construction permit but no later than 225 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 operating permit to operate.
[Rule 62-210.300(2), FAC, FAC, and Rule 2.301, JEPB]
5. 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 2.1001, JEPB]
6. 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 Department.
[Rule 62-296.320(1)(a), FAC, and Rule 2.1001, JEPB]
7. The facility shall be subject to 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].
8. The facility shall be subject to JEPB Rule 2, Part Nos. I through VII, and Part Nos. IX through XIII.
9. Excess emissions resulting from startup, shutdown, or malfunction of any emission unit shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Department for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. In the case of excess emissions

Permittee:
BP Products North America, Inc.

Draft Permit Number: 0310179-008-AC

resulting from malfunctions, each owner or operator shall notify the Permitting Authority in accordance with Rule 62-4.130, FAC and Rule 2.1301, JEPB. A full written report on the malfunctions shall be submitted to the Permitting Authority in a quarterly report, if requested by the Permitting Authority.
[Rule 62-210.700, FAC, and Rule 2.201, JEPB]

10. Permittee shall notify the Department fifteen (15) days prior to Emission Unit (EU) testing including vessel inspection, unless otherwise specified.
[Rule 62-297.310(7)(a)(9), FAC, and Rule 2.1101, JEPB]
11. Copies of the test report(s) shall be submitted to the Department within forty-five (45) days of completion of testing.
[Rule 62-297.310(8)(b), FAC, and Rule 2.1101, JEPB]
12. Testing of emissions shall be conducted with the EU operating at permitted capacity. Permitted capacity is defined as 90-100 percent of the maximum operating rate allowed by the permit. If it is impracticable to test at permitted capacity, then the EUs may be tested at less than capacity; in this case subsequent EU operation is limited to 110 percent of the test load until a new test is conducted. Once the EU is so limited, then operation at higher capacities is allowed for no more than 15 consecutive days for the purposes of additional compliance testing to regain the permitted capacity in the permit.
[Rule 62-297.310(2), FAC, and Rule 2.1101, JEPB]
13. Control equipment shall be provided with a method of access that is safe and readily accessible.
[Rule 62-4, FAC, and Rule 2.1301, JEPB]
14. The permittee shall submit all compliance related notifications and reports required of this permit to:

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

15. Any reports, data, notification, 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 and EPCRA Enforcement Branch
61 Forsyth Street
Atlanta, GA 30303
Telephone: 404/562-9155
Fax: 404/562-9163

16. The maximum throughput shall not exceed 450.0 x 10⁶ gallons per year of gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blends (12 month rolling total) and 260.0 x 10⁶ gallons per year of kerosene distillate oil (12 month rolling total).
[Applicant's Request, Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Section III. Emission Units and Conditions

Emission Unit No. 011 – Terminal A, Petroleum/Denatured Ethanol Storage Tank

Emission Unit Description - Tank No. 113 storing gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blends or lower vapor pressure VOL products

Control Device (s) - Internal Floating Roof

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, and Subpart A, General Provisions reporting requirements, notification requirements, and standards of performance, shall apply to the emission unit described herein

Essential Potential to Emit (PTE) Parameters

1. This emission unit is allowed to operate continuously, i.e., 8,760 hours per year.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. The fixed roof, in combination with the internal floating roof with primary and secondary seals, shall meet the standards required by 40 CFR 60.112b(a)(1).

Test Methods and Procedures

3. Testing inspections, testing procedures, and testing frequency shall be conducted in accordance with the requirements of 40 CFR 60.113b(a)
[Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Recordkeeping and Reporting Requirements

4. Reports and recordkeeping shall be in accordance with the provisions of 40 CFR 60.115b. Records shall be maintained for a minimum period of 5 years and shall be made available to the Department upon request.
[Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Monitoring of Operations

5. Monitoring shall be conducted in accordance with the requirements in 40 CFR 60.116b.
[40 CFR 60.116b, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Emission Unit No. 016 - Terminal A, Tank Truck Loading System

Emission Unit Description - 4 Bay Tank Truck Loading System loading gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blends or lower vapor pressure VOL products

Control Device(s) - Jordan Model JT-9078-85340-700 Carbon Adsorption/Absorption Vapor Recovery Unit (VRU) or Callidus, Inc. Vapor Combustion Unit [VCU(Backup)]

Essential Potential to Emit (PTE) Parameters

1. This emission unit is allowed to operate continuously, i.e., 8,760 hours per year.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. The maximum throughput rate shall not exceed 135,000 gallons per hour of gasoline, aviation gasoline, denatured ethanol and gasoline/denatured ethanol blends combined. This throughput rate applies when the VRU is only servicing gasoline, aviation gasoline, denatured ethanol, and gasoline/denatured ethanol blend vapors generated from EU 016 directly (non bladder tank mode).
[Rule 62-210.200, FAC, Rule 2.301, JEPB]

3. Total organic compounds (TOC) emissions shall not exceed 20 milligrams TOC per liter of gasoline, aviation gasoline, denatured ethanol, and gasoline/denatured ethanol blend loaded from the VRU or the VCU at the applicant's request.

The gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blends loading operational rate shall not exceed the manufacturer's maximum design rate. In the event that the VRU or VCU is used for VOC or TOC vapor control from EU 016 and EU 024; or from EU 024 only, the maximum gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blends throughput shall be limited to 57,500 gallons per hour during loading operations when gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blend vapors are vented directly to the VRU or VCU. The gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blends throughput shall be limited to 81,000 gallons per hour when gasoline, aviation gasoline, denatured ethanol, or gasoline/denatured ethanol blends vapors are vented to the vapor holding tank from EU 016 and/or EU 024. The maximum vapor flow rate from the vapor holding tank to the VRU or VCU shall be limited to 128 acfm [one (1) hour average], which is equivalent to a gasoline loading rate of 57,500 gallons per hour.

Gasoline, aviation gasoline, denatured ethanol, and gasoline/denatured ethanol blends shall not be loaded into tank trucks unless the vapors are vented to the **non full** vapor holding tank, the operating VRU, or the operating VCU. Distillate products may be loaded into tank trucks (which on the previous load did not carry gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blend) without being vented to the vapor holding tank, the VRU, or the VCU.

[Applicant's Request, Rule 62-296.510, FAC, and Rule 2.1001, JEPB]

Recordkeeping and Reporting Requirements

4. Monthly records of the quantity of each product loaded shall be recorded. The vapor flow rate from the vapor holding tank to the VRU and/or VCU shall be recorded, at least once daily, by recording the flow rate at the beginning and at the end of one hour during vapor transfer to the VRU and/or VCU. Records shall be maintained for a minimum period of five (5) years. Records shall be provided to the Department upon request.
[Rule 62-296.510, FAC, and Rule 2.1001, JEPB]

Test Methods and Procedures

5. The terminal owner/operator must ensure that each truck's vapor collection system is connected to the terminal's vapor collection system during loading of the tank truck (with gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blend) and is vapor tight.
[Rule 62-296.510(3)(a), FAC, and Rule 2.1001, JEPB]
6. Compliance testing shall be conducted on the potential sources of vapor leakage in the vapor collection system and the tank truck during the compliance test required by S.C. No. 8.

[Rule 62-296.510(4), FAC, and Rule 2.1001, JEPB]

7. Test Methods shall be [EPA RM 21, EPA RM 27 (40 CFR 60, Appendix A, July 1, 1995)], Rule 62-297, FAC, and Rule 2.1101, JEPB, as applicable. Testing shall also be conducted in accordance with Rule 62-297.440(2)(b)2.a., FAC, and Rule 2.1101, JEPB.
8. Testing for demonstration of compliance at the VRU/VCU shall be performed in accordance with EPA Reference Method 2A, 2B, 25A/25B, (as described in 40 CFR 60, Appendix A, July 1, 1995) for the VOC concentration. Testing shall also be conducted in accordance with Rule 62-297.440(2)(b)1.a., FAC, and Rule 2.1101, JEPB.
9. Compliance testing shall be performed annually (except 2011) from the date of July 1, 2006 on the Jordan VRU. Permit renewal testing shall be conducted on the Callidus, Inc. VCU on or about the date of July 1, 2011 in lieu of the 2011 annual test on the Jordan VRU.
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]
10. The permittee shall provide a means to prevent liquid waste from the loading device to exceed the quantity specified for the self sealing coupler or adaptor according to API regulation RP 1004 (or equivalent) upon the loading device being disconnected or when it isn't in use.
[Rule 62-296.510(3)(b), FAC, and Rule 2.1001, JEPB]

Emission Unit No. 019 – Terminal A, Eight (8) Petroleum/Denatured Ethanol Storage Tanks

Emission Unit Description - Tank Nos. 102 through 105, and 109 through 112 storing gasoline, aviation gasoline, denatured ethanol, or lower vapor pressure VOL products

Control Device(s) - Internal Floating Roof

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 2.1001, JEPB]; and **Petroleum Liquid Storage** [Rule 62-296.508, FAC, and Rule 2.1001, JEPB] shall apply to this emission unit.

Essential Potential to Emit (PTE) Parameters

1. This EU shall be allowed to operate continuously, i.e., 8760 hours per year.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. These fixed roof storage tanks with internal floating roofs shall be subject to control technologies and operation requirements as specified in Rule 62-296.508, FAC, and Rule 2.1001, JEPB. When distillate and other lower vapor petroleum products are stored in these storage tanks they shall be subject to Rule 62-296.320(1)(a), FAC, and Rule 2.1001, JEPB.

Test Methods and Procedures

3. VOC testing shall be conducted in accordance with Page 6-2 of EPA document 450/2-77-036. Compliance testing shall be performed annually. Internal Floating Roof and Roof Seals VOC testing shall be conducted by visual inspection of the floating cover through the roof hatches. The cover should be uniformly floating on or above the liquid, there should be no visible defects in the surface of the cover or liquid accumulated on the cover. The seal must be intact and uniformly in place around the circumference of the cover between the cover and the tank wall.

Testing requirements do not apply to these storage tanks when distillate or other lower vapor pressure petroleum products are stored.

[Rule 62-296.508(3)(a), FAC, Chapter 62-297, FAC; Rule 2.1001, JEPB, and Rule 2.1101, JEPB]

Record-keeping and Reporting Requirements

4. Testing (inspection results) shall be maintained for a period of five (5) years and shall be made available to the Department upon request.
[Rule 62-4.070, FAC, and Rule 2.1301, JEPB]

Emission Unit No. 024 - Terminal B, Tank Truck Loading Rack

Emission Unit Description – Tank Truck Loading System loading gasoline, aviation gasoline, and/or gasoline/denatured ethanol blends or lower vapor pressure VOL products

Control Device – Jordan Model JT-9078-85340-700 Carbon Adsorption/Absorption Vapor Recovery Unit or Callidus, Inc. Vapor Combustion Unit (Backup)

Essential Potential to Emit (PTE) Parameters

1. This emissions unit is allowed to operate continuously, i.e., 8,760 hours/year.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. The maximum throughput shall not exceed 90,000 gallons per hour and 300.0×10^6 gallons per year of gasoline, aviation gasoline, gasoline/denatured ethanol blends. The gasoline, aviation gasoline, gasoline/denatured ethanol blends loading operational rate shall not exceed the manufacturer's maximum design rate. This throughput rate applies when the VCU is only servicing gasoline, aviation gasoline, gasoline/denatured ethanol blends vapors generated from EU 024 directly.
[Rule 62-210.200, FAC, Rule 2.301, JEPB]
3. Total organic compounds (TOC) emissions from the VRU or the VCU shall not exceed 20 milligrams TOC per liter of gasoline, aviation gasoline, gasoline/denatured ethanol blends loaded.

The gasoline, aviation gasoline, gasoline/denatured ethanol blends loading operational rate shall not exceed the manufacturer's maximum design rate. In the event that the backup Callidus, Inc. Vapor Combustion Unit is used for VOC or TOC control of vapors from EU 016 and EU 024; or from EU 016 only, the maximum gasoline, aviation gasoline, gasoline/denatured ethanol blends throughput shall be limited to 57,500 gallons per hour during loading operations when gasoline, aviation gasoline, gasoline/denatured ethanol blends vapors are vented directly to the VCU. The maximum gasoline, aviation gasoline, gasoline/denatured ethanol blends throughput shall be limited to 81,000 gallons per hour when gasoline, aviation gasoline, gasoline/denatured ethanol blends vapors are vented to the vapor holding tank from EU 016 and/or EU 024. The maximum vapor flow rate from the vapor holding tank to the VRU or VCU shall be limited to 128 acfm [one (1) hour average],

which is equivalent to a gasoline, aviation gasoline, gasoline/denatured ethanol blends loading rate of 57,500 gallons per hour.

Gasoline, aviation gasoline, gasoline/denatured ethanol blends shall not be loaded into tank trucks unless the vapors are vented to the **non full** vapor holding tank, the operating VRU, or the operating VCU. Distillate products may be loaded into tank trucks (which on the previous load did not carry gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blend) without being vented to the vapor holding tank, the VRU, or the VCU.

[Applicant's Request, Rule 40 CFR 60.502(b), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

4. 40 CFR 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals, and 40 CFR 60, Subpart A, General Provisions, Reporting Requirements, Notification Requirements, and Standards of Performance shall apply to the source described herein.
[Rule 40 CFR 60.1 & 60.500, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Test Methods and Procedures

5. Testing for demonstration of compliance shall be performed in accordance with EPA Reference Method (RM) 25A/25B (as described in 40 CFR 60, Appendix A) for total organic compounds.
[Rule 40 CFR 60.503, Rule 62-204.800, FAC, and Rule 2.201, JEPB]
6. Specific testing requirements for vapor collection systems and tank trucks shall be as follows:

| <u>Specific Testing Required</u> | <u>Applicable Rule</u> | <u>Test Method</u> |
|---|---------------------------------------|---|
| A. Vapor collection and liquid equipment gauge pressure during product loading | 40 CFR 60.502(h) | 40 CFR 60.503(d) |
| B. Potential sources of vapor leakage in vapor collection system | 40 CFR 60.503(b) | EPA RM 21 |
| C. Gasoline tank truck tightness* | 40 CFR 60.502(e) and 40 CFR 60.505 | EPA RM 27 |
| *To be performed by tank truck owner/operator | | |
| D. Vapor collection system, vapor processing system, and loading rack(s) shall be inspected for TOC liquid or vapor leaks | 40 CFR 60.502(j) | Sight, sound, or smell detection method |

Item B testing shall be conducted immediately prior to testing Item A. Item B and A testing shall be conducted immediately prior to testing required in Specific Condition No. 7 below. Item D testing shall be conducted monthly.

7. Testing for TOC shall be conducted annually (except in 2011) from the date of July 1, 2006 on the Jordan VRU. Permit renewal testing for TOC shall be conducted on the Callidus, Inc. VCU on or about the date of July 1, 2011 in lieu of the 2011 annual test on the Jordan VRU.
[Rule 40 CFR 60.503, Rule 62-204.800, FAC, and Rule 2.201, JEPB]
8. Testing for demonstration of compliance shall be performed in accordance with 40 CFR 60.503.

[Rule 40 CFR 60.503, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Monitoring of Operations

9. The terminal owner/operator must ensure that each truck's vapor collection system is connected to the terminal vapor collection system during loading of the tank trucks.
[40 CFR 60.502(g), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Recordkeeping and Reporting Requirements

10. Records of gasoline tank truck loadings shall be kept in accordance with procedures found in 40 CFR 60.502(e).
[40 CFR 60.505, Rule 62-204.800, FAC, and Rule 2.201, JEPB]
11. Records of control device operation shall be maintained for a minimum of two (2) years and made available to the Department upon request.
[40 CFR 60.505, Rule 62-204.800, FAC, and Rule 2.201, JEPB]
12. Reporting and recordkeeping shall be as follows:

| <u>Record</u> | <u>Applicable Rule</u> |
|---|-------------------------------|
| A. Tank truck vapor tightness tests shall be kept on file | 40 CFR 60.505(a),(c), and (e) |
| B. Each tank truck file shall be updated annually | 40 CFR 60.505(b) |
| C. Monthly leak checks shall be kept on file at the terminal | 40 CFR 60.505(c) and (e) |
| D. Notifications to owner/ operator of each non-vapor tight truck shall be kept on file at the terminal | 40 CFR 60.505(d) and (e) |

[40 CFR 60.505, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

13. The owner or operator of an affected emission unit shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years.
[40 CFR 60.505(f), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

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

Emission Unit Description: Storage tank nos. 2, 3, and 4 for the storage of gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blend, or lower vapor pressure VOL products.

Control Device Description: Internal floating roofs

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 2.1001, JEPB]; and **Petroleum Liquid Storage** [Rule 62-296.508, FAC, and Rule 2.1001, JEPB] shall apply to this emission unit.

Essential Potential to Emit (PTE) Parameters

1. This EU shall be allowed to operate continuously, i.e., 8760 hours per year.
[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. These fixed roof storage tanks with internal floating roofs shall be subject to control technologies and operation requirements as specified in Rule 62-296.508, FAC, and Rule 2.1001, JEPB. When distillate and other lower vapor petroleum products are stored in these storage tanks they shall be subject to Rule 62-296.320(1)(a), FAC, and Rule 2.1001, JEPB.

Test Methods and Procedures

3. VOC testing shall be conducted in accordance with Page 6-2 of EPA document 450/2-77-036. Compliance testing shall be performed annually. Internal Floating Roof and Roof Seals VOC testing shall be conducted by visual inspection of the floating cover through the roof hatches. The cover should be uniformly floating on or above the liquid, there should be no visible defects in the surface of the cover or liquid accumulated on the cover. The seal must be intact and uniformly in place around the circumference of the cover between the cover and the tank wall.

Testing requirements do not apply to these storage tanks when distillate or other lower vapor pressure petroleum products are stored.

[Rule 62-296.508(3)(a), FAC, Chapter 62-297, FAC; Rule 2.1001, JEPB, and Rule 2.1101, JEPB]

Record-keeping and Reporting Requirements

4. Testing (inspection results) shall be maintained for a period of five (5) years and shall be made available to the Department upon request.

[Rule 62-4.070, FAC, and Rule 2.1301, JEPB]

Emission Unit No. 028 – Terminal B, Petroleum/Denatured Ethanol Storage Tank No. 5 [NSPS]

Emission Unit Description: Petroleum storage tank no. 5 for the storage of gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blend or lower vapor pressure VOL products.

Control Device Description: Internal floating roof

40 CFR 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction Reconstruction, or Modification Commenced after May 18, 1978, and prior to July 23, 1984, and Subpart A, General Provisions reporting requirements, notification requirements, and standards of performance, shall apply to the emission unit described herein

Essential Potential to Emit (PTE) Parameters

1. This EU shall be allowed to operate continuously, i.e., 8760 hours per year.

[Rule 62-210.200, FAC, and Rule 2.301, JEPB]

Emission Limitations and Standards

2. This emissions unit shall comply with all provisions for emissions control as described in 40 CFR 60.112a(a)(2).

[40 CFR 60.112a, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

Monitoring of Operations

Permittee:
BP Products North America, Inc.

Draft Permit Number: 0310179-008-AC

3. Monitoring of operations for this emissions unit shall be in accordance with 40 CFR 60.115a.
[40 CFR 60.115a, Rule 62-204.800, FAC, and Rule 2.201, JEPB]

FILING AND ACKNOWLEDGMENT

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

Clerk

Date

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