

ENVIRONMENTAL AND COMPLIANCE DEPARTMENT



**Permittee:**

BP Products North America, Inc.  
PO Box 26038  
Jacksonville, FL 32226

**Permit No.:** 0310179-007-AF

**Facility ID No.:** 0310179

**SIC No(s).:** 51

**Project:** Jacksonville Terminals A and B

**Revision No. 1**

This minor modification of a Federally Enforceable State Operating Permit (FESOP) is for the addition of two horizontal 10,000 gallon capacity fixed roof storage tanks, blending equipment and related piping equipment for ethanol blending with gasoline, the addition of 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. The facility is a bulk petroleum products storage and distribution terminal. This facility is located at 2101 Heckscher Drive, 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.

**Renewal Application Due Date: September 1, 2011**

**Expiration Date: October 30, 2011**

**Environmental and Compliance Department  
Environmental Quality Division**

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

RSP/DH

## Section I. Facility Information

### Subsection A. Facility/Project Description

This permit revision is for the addition of two horizontal 10,000 gallon capacity fixed roof storage tanks, blending equipment and related piping equipment for ethanol blending with gasoline, the addition of 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 and other petroleum 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 are controlled through a carbon adsorption/absorption vapor recovery unit and/or a vapor combustion unit. Kerosene or lower vapor pressure petroleum products are also loaded into marine vessels and railcar tankers. Kerosene or lower vapor pressure petroleum product VOC emissions are vented to the atmosphere. Note: Terminal B, EU No. 025 (Tank Nos. 1, 2, 3, 4, and 5) has been deleted. See Subsection B below for new EU designations for Terminal B, Tank Nos. 1, 2, 3, 4, and 5.

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 Storage Tank No. 113 [NSPS, Subpart Kb]	Internal Floating Roof with primary mechanical shoe seal
016	Terminal A Tank Truck Loading System and Denatured Ethanol loading System	Jordan Model JT-9078-85340-700 Carbon Adsorption/Absorption Vapor Recovery Unit or Callidus, Inc. Vapor Combustion Unit (Backup)
019	Petroleum/ Denatured Ethanol Storage Tank Nos. 102 through 105, and 109 through 112 [RACT]	Internal Floating Roofs
020	Fixed Roof Petroleum Storage Tank Nos. 106, 108, 114, 115, 116 and 117 *Note: Storage Vessel No. 116 has been retrofitted with an internal Floating Roof with primary mechanical shoe seal and secondary wiper blade	*None
021	Miscellaneous Storage Tank Nos. 122, 128, 130, 146, 147, Jet Additive, Red Dye A, B, 11, Dock Interface Tank, Wastewater Tank No. 148 Note: The 10,000 gallon wastewater tank located near the truck loading/unloading skid has been added to this emission unit.	None
022	Marine Petroleum Loading System	None
023	Railcar Tanker Loading System	None

**Permittee:**  
**BP Products North America, Inc.**

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<b><u>EU No.</u></b>	<b><u>EU Description, Terminal B</u></b>	<b><u>Control Device</u></b>
024	Tank Truck Loading Rack	Jordan Model JT-9078-85340-700 Carbon Adsorption/Absorption Vapor Recovery Unit or Callidus, Inc. Vapor Combustion Unit (Backup)
026	Petroleum Storage Tank No. 1	None
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
029	Miscellaneous Storage Tank No. 149	None
	Note: The 10,000 gallon ethanol gauging/proving tank located near Storage tank no. 3 has been added to this emission unit.	

**Subsection C. Relevant documents**

Federally Enforceable State Air Operation Permit revision application received September 21, 2009

Federally Enforceable State Air Operation Permit renewal application received August 25, 2006

Permit No.: 0310179-008-AC

Permit No.: 0310179-009-AC

## **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)
  - ☒ 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 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. Permittee shall notify the Department fifteen (15) days prior to EU testing.  
[Rule 62-297.310(7)(a)(9), FAC, and Rule 2.1101, Jacksonville Environmental Protection Board (JEPB)]
2. Copies of the test report(s) shall be filed with the Department within forty-five (45) days of completion of testing.  
[Rule 62-297.310(8)(b), FAC, and Rule 2.1101, JEPB]
3. 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 EU 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]
4. 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]
5. Control equipment shall be provided with a method of access that is safe and readily accessible.  
[Rule 62-297.310(6), FAC, and Rule 2.1101, JEPB]
6. Stack sampling facilities shall comply with the requirements of Rule 62-297.310(6), FAC, and Rule 2.1101, JEPB.
7. 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]

8. 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]
9. 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].
10. The facility shall be subject to JEPB Rule 2, Part Nos. I through VII, and Part Nos. IX through XIII.
11. 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 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]
12. 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 April 1.  
[Rule 62-210.370(3), FAC, and Rule 2.301, JEPB]
13. The permittee shall apply for a renewal operation permit sixty (60) days prior to the expiration date of this permit.  
[Rule 62-4.090, FAC, and Rule 2.1301, JEPB]
14. The permittee shall submit all compliance related notifications and reports required by this permit to:

Environmental and Compliance Department  
Environmental Quality Division  
407 North Laura Street, Third Floor  
Jacksonville, FL 32202  
Telephone: (904) 255-7100  
Fax: (904) 588-0518

15. The maximum throughput shall not exceed  $450.0 \times 10^6$  gallons per year of gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blends (12 month rolling total) and  $260.0 \times 10^6$  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 stores gasoline, aviation gasoline, denatured ethanol, and/or gasoline/denatured ethanol blends or lower vapor pressure VOL products.  
Tank No. 113 has a capacity of 46,298 bbl (1,944,516 gallons)

Control Device (s) - Internal Floating Roof with mechanical shoe seal

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 emissions unit (each vessel) 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. 40 CFR 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid (VOL) Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, shall apply to the emission unit described herein. Applicable portions of Subpart A, General Provisions shall apply to the emission unit described herein.  
[40 CFR 60, Subpart Kb, 40 CFR 60.7, Rule 62.204.800, FAC, and Rule 2.201, JEPB]
3. Each fixed roof in combination with an internal floating roof shall meet the following specifications:
  - (i) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
  - (ii) Each internal floating roof shall be equipped with the following closure device (a mechanical shoe seal) between the wall of the storage vessel and the edge of the internal floating roof.

The mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
  - (iii) Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
  - (iv) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
  - (v) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

- (vi) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
  - (vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
  - (viii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.
  - (ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.
- [40 CFR 60.112b, Rule 62.204.800, FAC, and Rule 2.201, JEPB]

#### **Test Methods and Procedures**

4. After installing the control equipment (internal floating roof), each owner or operator shall:
- (i) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
  - (ii) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Department in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
  - (iii) Visually inspect the internal floating roof, the primary seal, gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in Specific Condition No. 4 (ii) above.

[40 CFR 60.113b, Rule 62.204.800, FAC, and Rule 2.201, JEPB]

#### **Monitoring of Operations**



5. The owner or operator of this storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. These records shall be kept for the life of the storage vessel.  
[40 CFR 60.116b(a), Rule 62-204.800, FAC, and Rule 2.201, JEPB]
6. The owner or operator of this storage vessel shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period for the storage vessel.  
[40 CFR 60.116b(c), Rule 62-204.800, FAC, and Rule 2.201, JEPB]
7. The owner or operator of this storage vessel shall notify the Department 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).  
[40 CFR 60.116b(d), Rule 62-204.800, FAC, and Rule 2.201, JEPB]
8. The maximum true vapor pressure of the VOL shall be determined in accordance with the methods and procedures specified in 40 CFR 60.116b(e).  
[40 CFR 60.116b(e), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

**Notification, Recordkeeping, and Reporting**

9. Notify the Department in writing at least 30 days prior to the filling or refilling of the storage vessel for which an inspection is required by paragraph (5)(i) and (5)(iii) above of this section to afford the Department the opportunity to have an observer present. If the inspection required by paragraph (5)(iii) above of this section is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the vessel, the owner or operator shall notify the Department at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Department at least 7 days prior to the refilling.  
[40 CFR 60.113b, Rule 62.204.800, FAC, and Rule 2.201, JEPB]
10. The owner or operator of this storage vessel shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of this emission unit.  
[40 CFR 60.7(b), Rule 62-204.800, FAC, and Rule 2.201, JEPB]
11. The owner or operator shall keep a record of each inspection performed as required by 40 CFR 60.113b (a)(1), (a)(2), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).  
[40 CFR 60.115b, Rule 62-204.800, FAC, and Rule 2.201, JEPB]
12. If any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the Department within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made.  
[40 CFR 60.115b, Rule 62-204.800, FAC, and Rule 2.201, JEPB]
13. Records required by 40 CFR 60.7(f) shall be retained in a permanent form for a minimum period of two years, unless otherwise specified.  
[40 CFR 60.7(f), Rule 62-204.800, FAC, and Rule 2.201, JEPB]

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

**Permittee:**  
**BP Products North America, Inc.**

**Revised Permit Number: 0310179-007-AF**

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 and EPA RM 27 (40 CFR 60, Appendix A, adopted by reference in 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) 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, 2009 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 gasoline 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. 020 – Terminal A, Fixed Roof Petroleum Storage Tanks**

Emission Unit Description - Petroleum Storage Tanks Nos. 106, 108, 114, 115, 116, and 117  
Note: Storage Vessel No. 116 has been retrofitted with an internal Floating Roof with primary mechanical shoe seal and secondary wiper blade

**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. Petroleum products stored in these tanks are distillate fuel oils such as Kerosene, No. 2 fuel oil, and other lower vapor pressure petroleum products.  
[Rule 62-296.320(1), FAC, and Rule 2.1001, JEPB]
3. Vessel No. 116 only -- Products stored in this tank are ethanol, distillate fuel oils such as Kerosene, No. 2 fuel oil, and other lower vapor pressure petroleum and non-petroleum products. Storage Vessel No. 116 shall not store gasoline products.

**Emission Unit No. 021 – Terminal A, Miscellaneous Storage Tanks**

Emission Unit Description - Miscellaneous Storage Tanks Nos. 122, 128, 130, 146, 147, Jet Additive, Red Dye, A, B, 11, Dock Interface Tank, Wastewater Tank No. 148.  
Note: 10,000 gallon Wastewater Tank (near ethanol skid) has been added to this emission unit

**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. Petroleum and non-petroleum stored in these tanks are fuel additives, dyes, and other liquids including tank condensate and waste water contaminated with denatured ethanol.  
[Rule 62-296.320(1), FAC, and Rule 2.1001, JEPB]

**Emission Unit No. 022 – Terminal A, Marine Petroleum Loading System**

Emission Unit Description - Loading of marine vessels with kerosene or lower vapor pressure petroleum product

**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]
2. The marine vessel loading operation shall not be subject to the National Emission Standards for Marine Tank Vessel Tank Loading Operations [40 CFR 63, Subpart Y] since the Marine Tank Vessels Tank Loading Operation is not a major source.

**Emission Limitations and Standards**

3. Loading of Marine vessels with petroleum products shall be limited annually (12 month rolling total) as follows:

<b><u>Petroleum Product</u></b>	<b><u>Annual Limit</u></b>
Kerosene or lower vapor pressure petroleum product [Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]	10.0 million gallons

**Recordkeeping and Reporting Requirements**

4. Monthly records of the marine loading operation throughput shall be kept and maintained for a minimum period of five (5) years. Records shall be provided to the Department upon request.  
[Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]

**Emission Unit No. 023 - Terminal A, Railcar Tanker Loading System**

Emission Unit Description - Railcars are loaded with kerosene or lower vapor pressure petroleum product

**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. Loading of railcar tankers with petroleum products shall be limited annually (12 month rolling total) as follows:

<u>Petroleum Product</u>	<u>Annual Limit</u>
Kerosene or lower vapor pressure petroleum product [Rule 62-4.070(3), FAC, and Rule 2.1301, JEPB]	45.0 million gallons

**Recordkeeping and Reporting Requirements**

3. Monthly records of the railcar loading operation throughput shall be kept and maintained for a minimum period of five (5) years. Records shall be provided to the Department upon request.  
[Rule 62-4.070(3), 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  $300.0 \times 10^6$  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(7), 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:

<b><u>Specific Testing Required</u></b>	<b><u>Applicable Rule</u></b>	<b><u>Test Method</u></b>
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, 2009 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(7), 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:

**Record**

**Applicable Rule**

- |   |                               |
|---|-------------------------------|
| 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. 026 – Terminal B, Petroleum Storage Tank No. 1**

Emissions Unit Description - One (1) storage tank. Tank No. 1 stores kerosene or lower vapor pressure petroleum products.

**Essential Potential to Emit (PTE) Parameters**

1. This emissions 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 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 shall apply to Tank No. 1.  
[Rule 62-296.320(1)(a), FAC, and Rule 2.1001, JEPB]

**Emission Unit No. 027 - Terminal B, Petroleum 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 gasoline 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 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**

**Permittee:**  
**BP Products North America, Inc.**

**Revised Permit Number: 0310179-007-AF**

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**

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]

**Emission Unit No. 029 – Terminal B, Miscellaneous Storage Tank No. 149**

Emission Unit Description - 10,000 gallon proving/gauging tank for the temporary storage of denatured alcohol during loading rack gauging operations. Tank is located near storage tank no. 3.

**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 product stored in this tank is denatured ethanol for proving/gauging purposes for the loading rack system.  
[Rule 62-296.320(1), FAC, and Rule 2.1001, 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

**Permittee:**  
**BP Products North America, Inc.**

**Revised Permit Number: 0310179-007-AF**

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