

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION

I. GENERAL INFORMATION

A. APPLICANT

Hess Corporation
1 Hess Plaza
Woodbridge, NJ 07095

Draft Permit No.: 0310180-014-AC
County: Duval

B. PROJECT

The applicant, Hess Corporation, Jacksonville Terminal, applied on October 22, 2007, to the Department for a permit to construct/modify storage tank no. 7706. The modification allows the storage of gasoline, ethanol, distillate fuel oil and other lower vapor pressure petroleum and non-petroleum fuels in the tank. The Hess Corporation, Jacksonville Terminal, is located at 2617 Heckscher Dr., Jacksonville, FL 32229. The facility emits criteria pollutants and hazardous air pollutants.

II. RULE APPLICABILITY

The facility is located in an area unclassifiable for the air pollutant particulate matter less than or equal to ten (10) micrometers; is located in the area of influence of an air quality maintenance area for particulate matter, is located in an air quality maintenance area for the pollutant ozone (volatile organic compounds), and is located in an attainment area for all other criteria pollutants, pursuant to Rule 62-204, Florida Administrative Code (FAC), and Jacksonville Environmental Protection Board (JEPB), Rule 2.201.

The facility is currently a major source of air pollution because the potential emissions of regulated criteria air pollutants are greater than 100 tons per year. The potential emissions of Hazardous Air Pollutants (HAP) are synthetically limited by operational restrictions to less than 10 tons per year for a single HAP and less than 25 tons per year for total HAPs in accordance with Rule 62-210, FAC, and JEPB Rule 2.301.

The facility is minor for purposes of Prevention of Significant Deterioration. The modification of tank no. 7706 itself will not be a major source of air pollution; therefore, a Best Available Control Technology Determination is not required. The tank modification will allow operational flexibility to the Hess Corporation during the storage and handling of petroleum and non-petroleum fuel products.

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.

Information is available which indicates that Tank 7706 may be subject to New Source Performance Standards (NSPS), 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. The NSPS also requires the installation of a floating roof (or equivalent control technology) to control VOCs. There appears to be conflicting determinations (NSPS applicability or not) on this issue for similar storage tanks which were converted from oil storage to gasoline storage. This issue is currently being reviewed by the Environmental Protection Agency (EPA). If necessary, upon conclusion of the EPA review, appropriate permitting action will be taken to address the correct applicable standard in the permit. Emissions of VOCs from the tank will not change regardless of the final rule applicability determination since the control device is the same.

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III. TECHNICAL EVALUATION

<u>Emission Unit ID No.</u>	<u>Brief Description</u>	<u>Control Device</u>
015	Tank No. 7706	Internal Floating Roof

This construction permit is for the construction/modification of storage tank no. 7706 for the conversion of the fixed roof tank to an internal floating roof tank with a mechanical shoe seal. Volatile Organic Compound (VOC) emissions are controlled by the installation of an internal floating roof with mechanical shoe seal and various associated appurtenances. Compliance, testing, monitoring, record keeping, and reporting requirements are specified in the permit.

IV. CONCLUSION

Based upon information provided by the Hess Corporation, the Environmental and Compliance Department, Environmental Quality Division has reasonable assurance that the construction/modification of storage tank no. 7706 at the Hess Corporation, Jacksonville 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.