TECHNICAL EVALUATION

AND

PRELIMINARY DETERMINATION

I. GENERAL INFORMATION

A. APPLICANT

Hess Corporation
1 Hess Plaza
Woodbridge, NJ 07095

Draft Permit No.: 0310180-017-AC
County: Duval

B. PROJECT

The applicant, Hess Corporation, applied on September 19, 2008, to the Department for a permit to increase the throughput of the Tank Truck Loading Rack (EU 005) for gasoline, distillate oil and ethanol. A modification in the physical design of the loading rack is not necessary for facilitating this change. Additionally, Tank No. 7722 will be included with the currently listed additive tanks of emissions unit (EU) 007. 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 major for purposes of Prevention of Significant Deterioration. The increase in the throughput of fuels for the tank truck loading rack will not result in a significant net increase of volatile organic compounds nor will recent permitted modifications in addition to this modification result in a significant net increase of volatile organic compounds, therefore, additional Prevention of Significant Deterioration analysis is not required. This modification will allow operational flexibility to the Hess Corporation during the handling of petroleum and non-petroleum fuel products.

The project is subject to the provisions of New Source Performance Standards (NSPS) 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.

III. TECHNICAL EVALUATION

Emissions Unit No. 005 - Six Bay Tank Truck Loading Rack

This project increases the throughput of the tank truck loading rack for the loading of gasoline, distillate oil and ethanol. The maximum gasoline throughput rate shall be limited to 158,000 gallons per hour and 600.00 x 10^6 gallons per year. The maximum distillate oil throughput rate shall be limited to 180,000 gallons per hour and 374.00 x 10^6 gallons per year. The maximum ethanol throughput rate shall be limited to 180,000 gallons per hour and 60.00 x 10^6 gallons per year. The maximum gasoline, gasoline products, and ethanol throughput rate combined shall be limited to 600.00 x 10^6 gallons per year.

Volatile Organic Compounds (VOC) from gasoline loading operations are controlled through a primary vapor combustion unit (John Zink Company Vapor Combustor, Model Number ZCT-3-9-50-X-2/8-2/8-X). Either of two McGill carbon adsorption/absorption vapor recovery units shall be used as back-up vapor control units.

This emissions unit is allowed to operate continuously, i.e., 8,760 hours per year.

Total organic compounds (TOC) from gasoline, gasoline products, and ethanol loading shall be limited to 10 milligrams per liter of gasoline loaded and to 25.04 tons per year.

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.

Testing for demonstration of compliance shall be performed in accordance with EPA Reference Method 2A, and 25A/25B (as described in 40 CFR 60, Appendix A) for TOC emissions. Compliance testing of the flare shall be performed annually from the date of December 1, 2008. Testing may be performed up to 60 (sixty) days prior to the testing due date. Testing of the backup vapor recovery unit(s) shall be performed upon request of the Department.

Specific testing requirements for vapor collection systems and tank trucks shall be as follows:

	Specific Testing Required	Applicable Rule	Test Method
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 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

Note: Items A and B above shall be performed during the compliance testing required in Specific Condition 5., item D shall be performed monthly.

The terminal owner/operator must ensure that each gasoline tank truck's vapor collection system is connected to the terminal vapor collection system during loading of gasoline tank trucks. Gasoline shall not be loaded into tank trucks unless the vapors are vented to the VCU or one or both of the operating VRUs. Distillate products may be loaded into tank trucks (non gasoline service) without being vented to the VCU or VRUs.

The owner/operator shall ensure that loading of liquid products into gasoline tank trucks is limited to vapor tight gasoline tank trucks using the procedures found in 40 CFR 60.502(e). All records, cross-checks, and notifications shall be conducted in accordance with the procedures outlined in 40 CFR 60.502(e).

Records of control device operation including but not limited to replacements and additions of components shall be maintained for a minimum of five (5) years and made available to the Department upon request.

Reporting and record-keeping shall be as follows:

	Record	**Applicable Rule**
A.	Tank truck vapor tightness tests shall be kept on file at the terminal in permanent form.	40 CFR 60.505(a)
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)
D.	Notifications to owner/ operator of each non-vapor tight truck shall be kept on file at the terminal.	40 CFR 60.505(d)

This emissions unit is subject to the CAM requirements contained in the attached Appendix CAM. Failure to adhere to the monitoring requirements specified does not necessarily indicate an exceedance of a specific emissions limitation; however, it may constitute good reason to require compliance testing pursuant to Rule 62-297.310(7)(b), FAC, and Rule 2.1101, JEPB.

Emissions Unit No. 007 - Fixed Roof Storage Tanks

Fixed roof storage tanks storing fuel additives or other lower vapor pressure fuel products. Tank Nos. 7712, 7714, 7715, 7716, 7717, 7719 and 7722.

This project includes Tank No. 7722 with the currently listed additive tanks of Emissions Unit No.007.

This emissions unit is allowed to operate continuously, i.e., 8,760 hours per year.

The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any installation, VOCs or organic solvents without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Department.

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 the Tank Truck Loading Rack (EU 005) and of the Fixed Roof Storage Tanks (EU 007) 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.