STATEMENT OF BASIS

BP Products North America, Inc.
Facility ID No.: 0310179
Duval County

Initial Title V Air Operation Permit
FINAL Air Operation Permit No.: 0310179-014-AV

This permit is the Initial Title V Air Operation Permit, No. 0310179-014-AV. This permit is for the purpose of incorporating the applicable terms and conditions identified in Construction Permit No. 0310179-012-AC issued on April 8, 2010 and Construction Permit No. 0310179-013-AC issued on June 24, 2010. BP Products North America, Inc. is a bulk petroleum products storage and distribution terminal.

This Title V Air Operation Permit is issued under the provisions of Chapter 403, Florida Statutes (FS), and Chapters 62-4, 62-210 and 62-213, Florida Administrative Code (FAC). The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the permitting authority, in accordance with the terms and conditions of this permit.

BP Products North America, Inc. is a bulk petroleum products storage and distribution terminal. Petroleum products (gasoline, diesel fuel, kerosene and jet fuel) and denatured ethanol are received from sea going vessels, railcar tankers and tanker trucks. These products are stored in the appropriate fixed or floating roof storage tanks. Gasoline, diesel fuel, denatured ethanol and jet fuel are then loaded into tanker trucks at one of the two tank truck loading rack systems. VOC and HAP emissions from these loading operations are controlled by use of either a carbon adsorption/absorption vapor recovery unit (VRU) or a vapor combustion unit (VCU). Distillates, denatured ethanol, and/or lower vapor pressure petroleum products can be loaded into marine vessels and railcar tankers. Petroleum contact water (PCW) from storm water and spills at the truck loading rack and from water draws from the gasoline and distillate storage tanks go to PCW tanks and is stored until it is shipped offsite for disposal.

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

EU No.	EU Description, Terminal A
011	Petroleum Storage Tank Nos. 113 and 116 [NSPS, Subpart Kb]
016	Terminal A Tank Truck Loading System and Denatured Ethanol loading System
019	Petroleum/Denatured Ethanol Storage Tank Nos. 102 through 105, and 109 through 112 [RACT]
020	Fixed Roof Petroleum Storage Tank Nos. 106, 108, 114, 115, and 117
022	Marine Petroleum Loading System
023	Railcar Tanker Loading System

EU No.	**EU Description, Terminal B**
024	Terminal B Tank Truck Loading Rack
026	Petroleum Storage Tank No. 1
027	Petroleum/Denatured Ethanol Storage Tank Nos. 2, 3, and 4 [RACT]
028	Petroleum/Denatured Ethanol Storage Tank No. 5 [NSPS, Subpart Ka]

Additional Emission Units:

EU No.	**EU Description**
030	Fugitive VOC and Fugitive HAP Emissions
032	Emergency Diesel Engines

This facility shall be subject to the following subparts:

40 CFR 60, Subpart A, General Provisions (Emission Unit No. 032)

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 (Emission Unit No.028)

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 (Emission Unit No. 011)

40 CFR 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals (Emission Unit No. 024)

40 CFR 63, Subpart A, General Provisions, Reporting Requirements, Notification Requirements, and Standards of Performance (Emission Unit Nos. 011, 016, 019, 024, 027, 028 and 030)

40 CFR 63, Subpart R, National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations: 40 CFR 63. 420(a), 40 CFR 63. 420(c), and 40 CFR 63.428(i) (Facility)

40 CFR 63, Subpart BBBBBB, National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (Emission Unit Nos. 011, 016, 019, 024, 027, 028 and 030)

The Marine Vessel Loading Operation (Emission Unit No. 022) 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.

The Tank Truck Loading System at Terminal A (Emission Unit No 016) shall not be subject to 40 CFR 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals since the replacement of an existing vapor processing system with a new vapor processing system did not constitute the building of a new loading rack nor modification or reconstruction of an existing loading rack. Refer to BP Products North America, Inc. letter dated September 10, 2002.

Also included in this permit are miscellaneous unregulated and insignificant emissions units and/or activities.

Emission Unit Nos. 016 and 024 are subject to Compliance Assurance Monitoring (CAM) requirements. Appendix CAM is attached.

Based on the Title V Air Operation Permit application received June 20, 2011, this facility is not a major source of hazardous air pollutants (HAPs).