



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

STATIONARY SOURCE COMPLIANCE DIVISION

APPLICATION PROCESSING AND CALCULATIONS

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APPL. NO.  
454293

DATE  
03/20/08

PROCESSED BY  
E.R.Ruivivar

CHECKED  
BY:

**PERMIT TO OPERATE  
- Change of Condition -**

COMPANY NAME: Chevron Products Company

MAILING ADDRESS: 324 W. El Segundo Blvd.  
El Segundo, CA 90245

EQUIPMENT LOCATION: 324 W. El Segundo Blvd.  
El Segundo, CA 90245

EQUIPMENT DESCRIPTION:

**APPLICATION NO. 454293**

Additions/new are noted in bold & underlines while deletions in strikeouts

Description	ID No.	Connected To	RECLAIM Source Type	Emissions and Requirements	Conditions
<b>Process 16: STORAGE TANKS</b>					P13.1 (existing)
<b>System 3: EXTERNAL FLOATING ROOF TANKS</b>					S13.3 (existing)
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 498, <b>WELDED SHELL</b> , 150,000 BBL; DIAMETER: 150 FT; HEIGHT: 47 FT <del>40</del> <b>7</b> IN, <b>WITH A MIXER</b> , WITH  FLOATING ROOF, PONTOON, <del>WELDED SHELL</del>  PRIMARY SEAL, CATEGORY A, METALLIC SHOE  SECONDARY SEAL, CATEGORY B OR BETTER <del>PER</del> <b>RULE 219(C)(4)</b> , WIPER TYPE  <del>GUIDEPOLE, UNSLOTTED, WITH GASKETED SLIDING COVER AND POLE WIPER</del>  A/N: <del>C17418</del> <b>454293</b>	D1393			HAP: (10) [40CFR 63 Subpart CC, #2, 6-23-2003]	<b>K67.54 (add)</b> <del>K67.67 (remove)</del>



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**PROCESS CONDITIONS**

**P13.1** All devices under this process are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Benzene	40CFR61, SUBPART	FF

[40CFR 61 Subpart FF, 12-4-2003]

[Processes subject to this condition: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 16]

**SYSTEM CONDITIONS**

**S13.3** All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1149
VOC	District Rule	463
VOC	District Rule	1178

[RULE 1149, 5-2-2008; **RULE 1178, 4-7-2006; RULE 463, 5-6-2005**]

[Systems subject to this condition: Process 16, System 1, 2, 3, 5]

**DEVICE CONDITIONS**

**K67.54** The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Tank throughput in barrels

Commodity/product stored and time period of its storage.

Actual vapor pressure, in psia, of each commodity/product stored.

Other records that may be required to comply with the applicable requirements of District Rules 463, 1149, 1178, and 40CFR63, Subpart CC.

[RULE 1149, 5-2-2008; **RULE 1178, 4-7-2006; RULE 463, 5-6-2005; 40CFR 63 Subpart CC, 6-23-2003**]

[Devices subject to this condition: D1324, D1351, D1356, D1363, D1366, **D1393**, D1439, D1445, D1446, D1447, D1449, D1451]

**K67.67** The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Throughput and vapor pressure of the stored product

[**RULE 1178, 4-7-2006; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 463,5-6-2005**]



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[Devices subject to this condition: D1270, D1277, D1278, D1279, D1280, D1282, D1283, D1285, D1286, D1287, D1288, D1290, D1291, D1292, D1301, D1303, D1313, D1314, D1315, D1316, D1317, D1318, D1325, D1332, D1345, D1349, D1350, D1354, D1355, D1370, D1383, ~~D1393~~, D1396, D1397, D1400, D1403, D1404, D1405, D1408, D1409, D1411, D1416, D1417, D1418, D1420, D1431, D1434, D1438, D1443, D1448, D1461, D1472, D1474, D1874]

BACKGROUND / INTRODUCTION:

Chevron Products Company (ID 800030) submitted AN 454293 on March 3, 2006 for a change of condition to their Tank No. 498 (see copy of current permit in Appendix A). In this subject application, Chevron requested only the following changes:

- 1.) Add one "existing" mixer.
2.) Transfer the "WELDED SHELL" description from the floating roof to the main tank specifications.
3.) Correct the height measurement of the tank based on its strapping chart as shown in Appendix B.
4.) Delete the phrase "PER RULE 219(C)(4)" from the secondary seal description for consistency with similar permit description. The phrase is not required and the referenced section number may change in future amendments of Rule 219.

The proposed changes to the equipment description are shown in bold and underline or strikethrough text in the equipment description on page 1 above. There will be no change to the kind of materials being stored in the tank, its throughput, vapor pressure, and even the tank deck fittings as shown in Appendix C.

PERMIT HISTORY:

The permitting history of the subject tank is shown in the following table. Documentation is contained in Appendix D.

Permit History for Tank 498 (D1393)

Table with 5 columns: Permit to Construct (No., Issue Date), Permit to Operate (No., Issue Date), and Description of Modification. Rows include permits A833, C17418, and 454293.

COMPLIANCE RECORD REVIEW:

There is no record of compliance problem related to the operation of the subject storage tank during the last 5 years.



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### PROCESS DESCRIPTION:

The current description of Tank No. 498 (D1393) is given the permit shown in Appendix A. There are no existing permit conditions that limit the type, throughput, or vapor pressure of commodities stored in this tank. As seen in the annual emission reports (AER) in **Appendix E**, isomax feed was stored in this tank during the 2002-2003 and 2003-2004 AER reporting periods. The reported vapor pressure of isomax feed is less than 0.1 psia. According to Chevron, this tank will continue to store isomax feed.

### CALCULATION:

Based on the permit history above, the subject equipment has not undergone NSR review and hence, its previous NSR baseline is zero as correctly shown in **Appendix F**. The mixer to be included in the permit description is an existing equipment as supported by documentation provided by Chevron as shown in **Appendix G** and therefore, its emissions (less than 100 lbs VOC/yr) are not subject to NSR. Since the changes requested in this application would not impact the tank emissions at all as explained in the evaluation below, no attempt would be made to define the baseline emissions before and after the requested changes. Hence, zero would still be reported for the NSR baseline for the subject application.

### EVALUATION / RULE COMPLIANCE REVIEW:

#### ***Tank Mixer***

There is no mention of the subject tank mixer in the District's permitting records but at the time of the last permitting action for this tank (1980) mixers were not listed in tank permits and were often not included in the Districts permitting files. As seen in Appendix G, Chevron provided internal documentation that verifies the existence of a mixer since at least 1977. The provided documentation is adequate to confirm that this is an existing mixer and that the tank has not been modified. Inclusion of the phrase "with a mixer" in the tank description is appropriate. Listing of this existing mixer does not impact emissions of any criteria or toxic air contaminants from this tank or impact the ability of the tank to meet the requirements of applicable rules and regulations.

#### ***Welded Shell Description***

The transfer of the "WELDED SHELL" description specified for the floating roof to the main tank description is just proper because same actually refers to the main tank shell and not to its floating roof.

#### ***Tank Dimensions***

Chevron requested a change to the tank height based on a 1985 strapping chart. The strapping chart is shown in Appendix B. The listed height would change from 47 FT 10 IN to 47 FT 7 IN. The 1985 strapping chart dimensions are expected to be more accurate than the original dimensions due to some settling of the tank since original construction. The change in the listed dimensions does not impact emissions of any criteria or toxic air contaminants from this tank or impact the ability of the tank to meet the requirements of applicable rules and regulations.

#### ***Secondary Seal Description Phrase "per Rule 219(c)(4)"***

The current description of the secondary seal is: SECONDARY SEAL, CATEGORY B OR BETTER PER RULE 219(C)(4), WIPER TYPE. Chevron requested to delete the phrase "per Rule 219(c)(4)" from the description since it is unnecessary and the rule section number may change if the rule is amended. This request is administrative in nature and should be granted.



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The description of the guidepole in the tank permit is being included to make the general description of the tank consistent with the current tank permit guidelines.

As indicated above, the proposed changes would not result in any emission increase and therefore, they are not subject to the provisions of NSR or any new NSPS requirements. On this basis, no operating limits would be specified such as throughput, vapor pressure or kinds of materials that can be stored. With proper maintenance and operation, the subject tank is expected to continue to comply with the following District Rules and Regulations:

**Rule 212:** No public notice is required because there is no emission increase from the change of condition. There is also no increase in toxic health risk and the equipment is not located within a 1,000-ft. of a school.

**Rule 401:** No visible emission is expected.

**Rule 402:** No nuisance problem is expected.

**Rule 463:** This tank is subject to the requirements of this rule since it has a storage volume of greater than 19,815 gallons and stores organic liquids, which is any liquid containing VOCs. The subject tank is provided with double tank seals that comply with the requirements of this rule.

**Reg. IX:** Standards of Performance for New Stationary Sources:

40CFR60, Subpart K (*Construction, Reconstruction or Modification after 6-1-73 and prior to 5-19-78*)

40CFR60, Subpart Ka (*Construction, Reconstruction or Modification after 5-18-78 and prior to 7-23-84*)

40CFR60, Subpart Kb (*Construction, Reconstruction or Modification after 7-23-84*)

The subject tank was installed in 1957. Subsequent changes (see permit history) including the subject application would not result in any emission increase. Therefore, the said equipment is not subject to any of these subparts.

**40CFR63,  
Subpart CC**

The equipment is subject to this regulation because of its potential to emit hazardous air pollutants (HAP) including benzene. Compliance with this regulation is expected

**Reg. X:** National Emission Standards for Hazardous Air Pollutants :

The subject tank was previously identified by the applicant as not subject to (see **Appendix H**) and would continue to be not subject to 40 CFR 61, Subpart FF. No recovered waste materials would be stored in the tank

**Rule 1149** Compliance with tank cleaning and degassing requirements of this rule is expected.



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**Rule 1173** There are no new fugitive components associated with the requested changes to the tank. The applicant has maintenance and inspection program required by this rule.

**Rule 1178** The tank is expected to comply with all the applicable requirements of this rule including R1178(d)(1)(A)(vii), [“Equip each unslotted guidepole well with a gasketed sliding cover and a flexible fabric sleeve or wiper.”], The use of a dome roof cover would not be required since the tank normally stores materials with vapor pressures less than 3 psia at actual storage conditions [Section (j)(5) exemption] based on so many years operation. According to Chevron, the tank will continue to store isomax feed with less than 0.1 psia vapor pressure.

**Reg. XIII:** New Source Review

Emission Increase: There is no emission increase from the requested changes.  
BACT/Offset Therefore, no BACT or emission offset is required.

Modeling: There is no VOC dispersion modeling required under R1303(b)(1), Appendix A.

Sensitive Zone Requirements – Not applicable because no ERC is required for this application.

Facility Compliance - Not applicable since there is no emission increase from the modification.

**Rule 1401:** No incremental increase in health risk is expected from the proposal.

**CEQA:** The proposed change of condition is not a significant project or part of a significant project requiring a CEQA document.

**Reg. XX:** RECLAIM rules do not apply since the proposal does not affect NO<sub>x</sub> and SO<sub>x</sub> emissions from the facility. The facility, however, is covered by a RECLAIM Permit that would incorporate this change.

**Reg. XXX:** The permit issued for this tank will be issued as a revision of Chevron’s Title V permit. Permit revisions are categorized into the following four types: *administrative, minor, de minimis significant and significant*. The review and distribution requirements for each revision type are summarized in the following table.



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**Title V Permit Revisions: Review and Distribution Requirements**

Revision Type	Permit Review and Distribution Requirements		
	EPA Review (45-day)	Public Notice (30-day)	Send Final Permit to EPA
Administrative	No	No	Yes
Minor	Yes	No	Yes
De Minimis Significant	Yes	No	Yes
Significant	Yes	Yes	Yes

As defined in Rule 3000, a minor Title V permit revision is any revision that:

- (1) does not require or change a case-by-case evaluation of: reasonably available control technology (RACT) pursuant to Title I of the federal Clean Air Act; or maximum achievable control technology (MACT) pursuant to 40 CFR Part 63, Subpart B;
- (2) does not violate a regulatory requirement;
- (3) does not require any significant change in monitoring terms or conditions in the permit;
- (4) does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit;
- (5) does not result in an emission increase of RECLAIM pollutants over the facility starting Allocation plus nontradeable Allocations, or higher Allocation amount which has previously undergone a significant permit revision process;
- (6) does not result in an increase in emissions of a pollutant subject to Regulation XIII - New Source Review or a hazardous air pollutant;
- (7) does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement;
- (8) is not an installation of a new permit unit subject to a New Source Performance Standard (NSPS) pursuant to 40 CFR Part 60, or a National Emission Standard for Hazardous Air Pollutants (NESHAP) pursuant to 40 CFR Part 61 or 40 CFR Part 63; and,
- (9) is not a modification or reconstruction of an existing permit unit, resulting in new or additional NSPS requirements pursuant to 40 CFR Part 60, or new or additional NESHAP requirements pursuant to 40 CFR Part 61 or 40 CFR Part 63; or,
- (10) incorporates an existing general permit, as defined in subdivision (e) of Rule 3004, and its associated requirements, into another Title V permit.

The revision related to this tank application meets all of the requirements above so it would be a minor Title V permit revision. The permit revisions proposed under this application will be combined into a de minimis significant Title V permit revision that is being proposed under Title V permit revision application number 516647. The de minimis significant Title V revision will be sent to EPA for a 45-day review. Public notice is not required.



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**RECOMMENDATION:**

Based on the foregoing evaluation, it is recommended that a Permit to Operate, change of condition, be issued for the subject storage tank with all the requested changes subject to all the conditions on pages 2 to 3.

Emmanuel Ruivivar

A.Q. Engr. II

[**Note:** This evaluation was updated for consistency with the current Title V permit and revised in response to supervisors comments – Bob Sanford 1/13/11]