



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

STATIONARY SOURCE COMPLIANCE DIVISION

APPLICATION PROCESSING AND CALCULATIONS

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APPL. NO.
436072

DATE
05/09/08

PROCESSED BY
E. Ruivivar

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BY

**PERMIT TO OPERATE
- Modification, PO no P/C -**

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:

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

Description	ID No.	Connected To	RECLAIM Source Type	Emissions and Requirements	Conditions
Process 16: STORAGE TANKS					P13.1 (existing)
System 3: EXTERNAL FLOATING ROOF TANK					S13.3 (existing)
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 934, TWO AGITATORS, 150,000 BBL; DIAMETER: 138 FT 6 IN; HEIGHT: 56 FT, WELDED SHELL , WITH FLOATING ROOF, PONTOON PRIMARY SEAL, CATEGORY A, METALLIC SHOE SECONDARY SEAL, CATEGORY B OR BETTER PER RULE 219(C)(4) , RIM MOUNTED GUIDEPOLE, SLOTTED, WITH GASKETED SLIDING COVER, POLE SLEEVE AND POLE WIPER	D1467			HAP: (10) [40CFR 63 Subpart CC, #2, 6-23-2003]	B22.32 (new) C1.150 (new) C1.41 (deleted) D90.34 (removed) E71.71 (new) E440.9 (added) H23.10 (existing) K67.76 (new)
A/N: 171040 436072					



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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

B22.32 The operator shall not use this equipment with materials having a(n) true vapor pressure of 3.0 psia or greater under actual operating conditions.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1178, 4-7-2006]

[Devices subject to this condition: **D1467**]

~~**C1.41** The operator shall limit the throughput to no more than 1.825e+07 barrels in any one calendar year.~~

~~[RULE 1303(b)(2)-Offset, 5-10-1996]~~

~~[Devices subject to this condition: **D1467**]~~

C1.150 The operator shall limit the throughput to no more than 8,592,520 barrel(s) in any one calendar month.

The operator shall calculate the throughput, in barrels, by the following equation: 0.14 x D x D x L, where D is the diameter of the tank in feet based on the tank strapping chart and L is the total vertical one-way roof travel in feet per month.

The operator shall install and maintain an automatic tank level gauge (ATLG) and recorder to continuously record the vertical movement of



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the roof. For the purpose of this condition, continuous recording is defined as once per hour.

The operator shall calculate the total one-way roof movement, in feet, on a daily and monthly basis.

The ATLG installed shall be verified once per quarter by comparing against a manual tank level measurement. If the ATLG differs from the manual tank level measurement by more than 1.0 inch or 0.8%, whichever is greater, the ATLG shall be repaired and put back into service within 10 days. While the ATLG is being repaired, the throughput shall be determined by the hourly tank level data averaged from the previous 30 days prior to the discovery of the discrepancy.

In the event of a failure or routine maintenance of the ATLG, the ATLG shall be repaired (if necessary) and put back into service within 10 days of the time that the ATLG failed or was removed from service for maintenance. While the ATLG is being repaired or maintained, the throughput shall be determined by the hourly tank level data averaged from the previous 30 days prior to the time that the ATLG went out of service.

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition: D1467]

D90.34 The operator shall install and maintain an automatic tank level gauge (ATLG) and recorder to continuously measure and record the liquid surface level movement. For the purpose of this condition, continuous recording is defined as once per hour.

For cylindrical tanks, the throughput, in barrels, shall be calculated using the following equation: $0.14 \times D \times D \times L$, where D is the diameter of the tank in feet based on the tank strapping chart and L is the total vertical one-way liquid surface level travel in feet per month.

For non-cylindrical tanks, the throughput, in barrels, shall be calculated using an appropriate equation that utilizes the liquid surface level movement.

Records of throughput shall be retained for a period of five years and made available to the Executive Officer upon request.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: D1269, D1284, D1300, D1305, D1319, D1321, D1323, D1326, D1330, D1336, D1337, D1338, D1348, D1365, D1368, D1374, D1376, D1380, D1385, D1386, D1387, D1392, D1398, D1399, D1401, D1402, D1408, D1413, D1414, D1415, D1419, D1455, D1458, ~~D1467~~, D2164]

E71.71 The operator shall only use this equipment for the storage of any of the following materials / commodities: Diesel Fuel, Jet A Fuel, JP-4 Fuel and JP-8 Fuel.



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[RULE 1401, 3-4-2005]

[Devices subject to this condition: D1467]

E440.9 The operator shall operate and maintain this equipment according to the following specifications:

The operator shall not use the slotted guidepole without a float and its wiper when the commodity being stored in this equipment has a vapor pressure greater than or equal to 0.5 psia at storage conditions.

The operator shall notify the primary SCAQMD inspector for the refinery anytime that the pole float is inserted into or removed from the slotted guidepole. The notification shall be made within 5 days of each insertion or removal of the pole float and shall include the basis for the insertion or removal of the pole float.

[**RULE 463, 5-6-2005**]

[Devices subject to this condition: D1390, D1442, D1467]

H23.10 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR60, SUBPART	K

[**40CFR 60 Subpart K, 5-5-1989**]

[Devices subject to this condition: D1282, D1283, D1313, D1358, D1361, D1375, D1377, D1386, D1389, D1411, D1416, D1417, D1418, D1420, D1449, D1467]

K67.76 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Tank throughput in barrels per calendar month.

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, 40CFR60, Subpart K, and 40CFR63, Subpart CC.

[**RULE 1149, 5-2-2008; RULE 1178, 4-7-2006; RULE 463, 5-6-2005; 40CFR 60 Subpart K, 5-5-1989; 40CFR 63 Subpart CC, 6-23-2003**]

[Devices subject to this condition: D1467]



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BACKGROUND:

Chevron Products Company (ID 800030) submitted AN 436072 on October 22, 2004 for a change of condition to their Tank No. 934 (see copy of current permit in **Appendix A**). In this subject application, Chevron requested the following changes:

- (1) Add an “existing” slotted guidepole with gasketed sliding cover and wiper to the equipment description to conform to current guidelines. Also to include the pole sleeve referred to in Item (7) below.
- (2) 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.
- (3) Add “Welded Shell” description to tank consistent with its original & existing shell type, and to conform to current tank description.

Later, Chevron requested additional changes (modification & change of condition) to include the following:

- (4) Increase the throughput limit from 1,520,833 bbls/mon (equivalent to 18,250,000 bbls/yr per current Cond. C1.41) to 8,592,520 bbls/mon.
- (5) Limit the true vapor pressure of materials stored in the tank to less than 3.0 psia for the increase in throughput , as well as, be able to stay under the dome cover requirement of Rule 1178.
- (6) Include a condition similar to the current Cond. E440.9 in the Chevron Facility regarding the use of a slotted guidepole pole float only to ensure compliance with the “no visible gap” requirement of Rule 463.
- (7) Add “pole sleeve” to the slotted guidepole description. This vapor control fitting was said to be installed last Oct., 2007 [Note: Chevron was advised to pay penalty fee for installing this device without a permit.]

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 or can be stored in the tank. These materials include diesel fuel, Jet A, JP-4 & JP-8 fuels. The tank deck fittings as shown in **Appendix B** will remain basically the same except that a pole sleeve is included with the slotted guidepole with the changes requested..

For billing purposes, this application will be considered as a modification without permit (P/O, no P/C) for the addition of a pole sleeve to the slotted guidepole so that the necessary penalty fee could be imposed.



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PERMIT HISTORY:

The permitting history for this tank is shown in the following table. Documentation is contained in **Appendix C**.

Permit History for Tank 934 (D1467)

Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
A78495		P65634 (inact)	01-06-76	Records not found.
146159	8-14-86	D03482 (inact)	11-07-88	For replacement of the vapor mounted toroidal (foam tube) primary seal with a mechanical shoe seal. The mechanical shoe seal was not installed under this PC but was installed under PC AN 171040.
171040	9-19-88	D11667	11-08-89	Replaced the existing foam tube primary seal with a mechanical shoe seal and added a rim mounted secondary seal. Also to increase the TVP limit of this tank to 11 psia. Was subject to NSR review and throughput limit imposed.
436072	---	---	---	For changes as described on page 6 of this evaluation.

COMPLIANCE RECORD REVIEW:

There is no record of outstanding compliance problem related to the operation of the subject storage tank.

PROCESS DESCRIPTION:

A description of Tank No. 934 (D1467) is contained in the equipment description above. The current permit is conditioned with a throughput limit of 18,250,000 barrels per year with no vapor pressure limit on stored material, meaning that it can store up to 11 psia as allowed under Rule 463. As seen in the annual emission reports (AER) in **Appendix D**, Chevron Jet Fuel A was stored in this tank during the 2002 to 2006 AER reporting periods. The reported vapor pressure of this jet fuel is less than 0.1 psia. According to Chevron, this tank continues to store Jet Fuel A and can also be used for the storage of diesel oil, JP-4 & JP-8 fuels.

EMISSION ESTIMATE:

The change in VOC emissions from the subject storage tank as a result of the proposed change of condition and modification was determined using the EPA Tank 4.0 calculation program. The calculations for the “before” and “after” scenarios were made based on the maximum potential to emit of the tank since it is a post- NSR equipment. The calculations considered the following parameters:



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Parameter	Before Change of Condition/ Modification	After Change of Condition/ Modification
Throughput	1,520,833 bbls/mon (equivalent to 18,250,000 bbls/yr per current Cond. C1.41)	8,592,520 bbls/mon [Item No. (4) request]
Max Storage Vapor Pressure (VP)	10.99 psia (No VP limit but Rule 463 allows up to less than 11 psia.)	2.99 psia [Item No. (5) request] (Requested value. No dome cover will be provided for the tank.)
Slotted Guidepole	<u>Without</u> pole sleeve	<u>With</u> pole sleeve [Item No. (7) request]
Commodities	Not specified in the condition but Chevron reported that the tank is for storage of any of the following commodities: diesel fuel, Jet A, JP-4 and JP-8	No additional commodity is proposed.

The calculations were made for each of the commodities that they would accept as a limitation for R1401 purposes. These calculations are shown in **Appendices E & F** and the results are summarized below (see also **Appendix G**):

Commodity	Estimated Total VOC Emissions, Lbs/Yr (Lbs/Day)		Net Emission Reduction, Lbs/Yr (Lbs/Day)
	After Change of Condition/ Modification	Before Change of Condition/ Modification	
Diesel	12,393.94 (33.96)	49,989.87 (136.96)	37,595.93 (103)
Jet A	12,288.64 (33.67)	49,971.23 (136.91)	37,682.59 (103.2)
JP-4	9,765.56 (26.75)	31,141.51 (85.32)	21,375.95 (58.6)
JP-8	11,972.72 (32.80)	49,915.31 (136.75)	37,942.59 (104)

The current emission baseline related to the previous AN 171040 is equal to 14 lbs VOC/day as shown in **Appendix H**. This value was determined based on an old methodology not consistent with the current calculation program. Therefore, the value should be updated to 85 lbs VOC per day as shown in the above table for JP-4 to show the minimum reduction expected for the proposed changes in throughput and vapor pressure.

EVALUATION:

As shown above, no emission increase is expected from the proposed change of condition/modification and therefore, it is not subject to the full provisions of NSR or new NSPS requirements. Limits on vapor pressure, throughput, and the commodities that can be stored in the subject tank would be specified consistent with the above determination. For NSR data, the minimum reduction will be reported to show a conservative air quality impact (minimum for a reduction and maximum for an increase).

The proposed changes requested in Item Nos. (1), (2), (3), & (6) as described on page 6 can be considered administrative in nature because it does not require an engineering evaluation to determine its air quality impact. The changes requested are just to conform to current District guidelines and ensure compliance.

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The subject tank after the proposed change of condition/modification 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 expected. There is also very minimal increase in toxic health risk (see Rule 1401 analysis below) 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. A condition would be specified similar to the current Cond. E440.9 in the Chevron Facility regarding the use of a slotted guidepole pole float to ensure compliance with the “no visible gap” requirement of Rule 463 when the commodity being stored in the tank has a vapor pressure greater than or equal to 0.5 psia at storage conditions.

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 is currently subject to 40CFR60, Subpart K per existing Cond. H23.10. Since no emission increase is expected from the change of condition/modification, no new NSPS would apply and the subject equipment would continue to be subject to 40CFR60, Subpart K .

**40CFR63,
Subpart CC**

The equipment is subject to this regulation because of its potential to emit hazardous air pollutants (HAP) including benzene. The subject tank is declared to belong to Grp 2 under this subpart (see **Appendix I**). Since the tank is subject to and would comply with 40 CFR 60, Subpart K, it is then considered complying with this Subpart CC. Chevron has also a program for their storage tanks to meet the monitoring/testing, inspection, recordkeeping and reporting requirements under this subpart

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

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



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

Rule 1173 There would be no new fugitive components associated with the tank modification. 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)(ix), ["Equip each slotted guidepole with a gasketed cover, a pole wiper, and a pole sleeve. The pole sleeve shall be extended into the stored liquid."], The use of a dome roof cover is not required since the tank would only be limited to storage of commodities with vapor pressures of less than 3 psia at actual storage conditions [Section (j)(5) exemption].

Reg. XIII: New Source Review

Emission Increase: No emission increase is expected from the change of condition/modification.

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: Rule 1401 contains the following requirements:

(1) *(d)(1) MICR and Cancer Burden* - The cumulative increase in MICR which is the sum of the calculated MICR values for all toxic air contaminants emitted from the new, relocated or modified permit unit will not result in any of the following:

(A) an increased MICR greater than one in one million (1.0×10^{-6}) at any receptor location, if the permit unit is constructed without T-BACT;

(B) an increased MICR greater than ten in one million (1.0×10^{-5}) at any receptor location, if the permit unit is constructed with T-BACT;

(C) a cancer burden greater than 0.5.

(2) *(d)(2) Chronic Hazard Index* - The cumulative increase in total chronic HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.



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(3) (d)(3) Acute Hazard Index - The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.

Based on the Tier 1 health risk screening analysis on any of the commodities to be handled as shown in **Appendix J**, the pollutant screening indices for cancer/ chronic and acute are less than 1.0; therefore, no further health risk analysis is required. The proposed change of condition/modification should comply with this rule.

CEQA: The proposed change of condition/modification 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 NOx and SOx 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.

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;

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- (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.

RECOMMENDATION:

Based on the foregoing evaluation, it is recommended that a Permit to Operate, change of condition/modification (P/O, no P/C), be issued for the subject storage tank subject to all the conditions on pages 2 to 4.

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]