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PERMITS-TO-OPERATE

COMPANY NAME AND ADDRESS

Edgington Oil Company
2400 E. Artesia Blvd.
Long Beach, 90805

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EQUIPMENT LOCATION

Edgington Oil Company
2400 E. Artesia Blvd.
Long Beach, 90805

Facility: 800264

EQUIPMENT DESCRIPTION

Additions are noted in underlines. Deletions are noted in ~~strikeouts~~.

Section D of Facility Permit, ID# 800264 (Sub ID 96227)

(The following changes have been made in Section D, P5/S2 of the Title V facility permit.)

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 5: STORAGE TANKS					
System 2: FIXED ROOF STORAGE TANKS					
STORAGE TANK, FIXED ROOF, NO. 1108, ASPHALT, WITH NITROGEN BLANKET, <u>CONNECTED TO A WATER SEAL DRUM</u> , 1100 BBL; DIAMETER: 15 FT 6 IN; HEIGHT: 30 FT A/N: 283532 471105	D133	D174			C6.5, D12.3, D323.2, K67.4
STORAGE TANK, FIXED ROOF, NO. 3001, ASPHALT, <u>WITH INTERNAL HEATING COILS</u> , <u>CONNECTED TO A WATER SEAL DRUM</u> , 3000 BBL; DIAMETER: 26 FT 5 IN; HEIGHT: 30 FT A/N: 285982 471107	D147	D174			C6.5, D12.3, D323.2, K67.4

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STORAGE TANK, FIXED ROOF, NO. 36001, ASPHALT, WITH STEAM <u>INTERNAL</u> HEATING COIL, AND CONNECTED TO A WATER SEAL DRUM, 36000 BBL; DIAMETER: 73 FT; HEIGHT: 48 FT A/N: 371311 471109	D170				C6.1, C6.x, D12.3, D323.2, K67.4
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CONDITIONS

C6.5 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 350 Deg F.

The operator shall install and maintain a temperature gauge to periodically monitor the asphalt temperature in the tank.

This condition shall not apply if the asphalt is handled in a manner approved by the Executive Officer that does not violate Rule 401.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D128, D129, D130, D131, D132, D133, D139, D140, D141, D144, D145, D147]

C6.1 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 400 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the asphalt tank.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition: ~~D170~~, D296, D297, D298, D299]

C6.x The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 425 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the asphalt tank.

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[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition: D170]

D12.3 The operator shall install and maintain a(n) thermocouple or any other equivalent device to accurately indicate the temperature of the the asphalt stored in or pumped into this tank.

The operator shall also install and maintain a device to continuously record the parameter being measured.

or

The operator shall record the parameter being monitored once every 8 hours.

[RULE 1301, 12-7-1995; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 401, 3-2-1984]

[Devices subject to this condition : D128, D129, D130, D131, D132, D133, D139, D140, D141, D144, D145, D147, D154, D170]

D323.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an semi-annual basis, at least, unless the equipment did not operate during the entire semi-annual period. The routine semi-annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or

2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

1). Stack or emission point identification;

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- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 401, 3-2-1984]

[Devices subject to this condition : D21, D26, D28, D30, D32, D35, D70, D89, D93, D95, D103, D110, D128, D129, D130, D131, D132, D133, D144, D145, D146, D147, D154, D170, D296, D297, D298, D299, D360]

K67.4 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 stored liquid

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

[Devices subject to this condition : D68, D69, D128, D129, D130, D131, D132, D133, D137, D139, D140, D141, D142, D143, D144, D145, D146, D147, D148, D149, D150, D151, D152, D153, D154, D155, D156, D157, D158, D159, D160, D161, D162, D163, D164, D165, D166, D167, D169, D170, D171, D172, D173, D272]

COMPLIANCE RECORD REVIEW

There are no outstanding compliance issues at Edgington Oil Company (EOC) as of January 2013. The facility's 5-year compliance history in District's CLASS data base shows the most recent NOV, issued in late 2012, has been resolved.

**Table 1
List of Edgington NOVs Issued Since January 2008**

Notice No.	Notice Type	Violation Date	Status	Violation
P53777	NOV	6/19/09	In Compliance	OPERATION OF A PORTABLE AIR COMPRESSOR WITHOUT A VALID PERMIT.
P53783	NOV	6/30/11	In Compliance	INACCURATE CERTIFICATION OF QUARTERLY EMISSIONS FOR QUARTER 1, QUARTER 2, AND QUARTER 3 OF THE COMPLIANCE OF YEAR 2010 RECLAIM CYCLE 2 AUDIT.

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BACKGROUND

In June of 2007, EOC submitted a batch of applications to address issues that were found during the permit cleanup effort made in preparation for the facility’s initial TV permit issuance. The subject applications (3) are for three fixed roof asphalt storage tanks in P5/S2 of the TV facility permit.

Table 2 is a summary of the changes requested by EOC:

Table 2 – Application Request Summary

A/N	Device ID	Tank No.	Requested Changes
471105	D133	T-1108	Add “ <u>connected to a water seal drum</u> ” to the equipment description section of the permit.
471107	D147	T-3001	Add “ <u>with internal heating coils, connected to a water seal drum</u> ” to the equipment description section of the permit.
471109	D170	T-36001	Replace “ <u>steam</u> ” with “ <u>internal</u> ” for heating coils and increase the temperature limit in condition C6.1 from 400°F to <u>425°F</u> .

PERMIT HISTORY

The permitting histories of the 3 tanks are summarized in the tables below:

Permit History for T-1108 (D133) (A/N 471105)

Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
C16623		M28921	1/5/83	Only C&C PO, dated 1/5/83, is shown in OnBase, no previous application shown in PAATs. Based on information contained in the facility’s Statement of Basis (SOB) for initial TV permit, this is a pre-NSR tank.
165723		M63603	5/24/88	Change of Ownership.
283532		D75425	7/23/93	Change of Ownership.
471105	-	-	-	See Requested changes in Table 2 above.

Permit History for T-3001 (D147) (A/N 471107)

Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
C06591		M00329	4/27/77	Only C&C PO, dated 4/27/77, is shown in

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				OnBase, no previous application shown in PAATs. This is a pre-NSR tank based on information contained in the facility's SOB for initial TV permit.
165718		M63399	5/24/88	Change of ownership.
285982		D77667	10/13/93	Change of ownership.
471107	-	-	-	See requested changes in Table 2 above.

Permit History for T-36001 (D170) (A/N 471109)

Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
C19926		M10208	4/25/80	No information found in OnBase. This is a pre-NSR tank based on information contained in the facility's SOB for initial TV permit.
165709		M63390	5/24/88	Change of ownership.
359258		F23429	12/3/99	Change of ownership.
371311		F32806	7/26/00	Change of Condition to operate tank with temperature limit of 400°F instead of 350°F.
471109	-	-	-	See requested changes in Table 2 above.

APPLICATION SUMMARY

Table 3 below summarizes the applications and fees submitted by EOC:

Table 3
AQMD Applications and Fee Submitted

A/N	Equipment Description	BCAT/CCAT	Fee Schedule	Type	Status	Fee	Total Fee Paid
471105	Asphalt Tank (<50,000 Gal)	214910	B	Alteration	21	\$2,543.21	\$2,543.21
471107	Asphalt Tank (>50,000 Gal)	214911	C	Alteration	21	\$4,022.62	\$4,022.63
471109	Asphalt Tank (>50,000 Gal)	214911	C	Alteration	20	\$2,681.75	\$2,681.75
Total						\$9,247.58	\$9,247.59

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PROCESS DESCRIPTION

EOC is a topping refinery that produces asphalt from heavy crude oils. Crude oil is fed to the atmospheric/vacuum units where it is separated into various fractions. The overhead liquid fraction is sold to oil refineries for further processing into gasoline, diesel and jet fuel. The heavy bottoms are sent to the refinery’s asphalt blowing (oxidizing) stills, where air is use to blow the asphalt at 400-500°F to produce different consistencies of asphalt product for sale to the roofing and road paving industries.

The subject tanks are used for storage and transfer of finished asphalts at EOC’s loading/unloading operations.

EMISSIONS

A/Ns 471105 (D133)

The addition of the water seal drum to T-1108 will effectively reduces emissions.

Without any emissions data currently established in the District’s NSR database, the baseline emissions for this tank was calculated using EPA’s Tanks 4.09 program and a conservative tank turnover of 365 (since there is no throughput limit for this pre-NSR tank). The report, identified as ‘T-1108’, is contained in application folder 471105 for reference. As shown, tank (baseline) emissions were calculated to be 887 lbs/yr (2.47 lbs/day). With the connection to a water seal drum, controlled emissions are expected to be 44.3 lbs/yr (0.12 lbs/day) based on a control efficiency of 95% for water seal drum. The NSR database has been updated with a baseline emissions of 887 lbs/yr.

A/N 471107 (D147)

The temperature limit for this T-3001 is (and will remain at) 350°F pursuant to permit condition C6.5. Therefore, the addition of heating coils does not change the emissions from this tank since the temperature limit will remain unchanged. However, the connection to a water seal drum, as discussed above, is expected to reduce the emissions from this tank. The NSR database shows a baseline emissions of 2.4 lbs/day for this tank. Controlled emissions will be 0.1 lb/day with connection to a water seal drum at 95% control efficiency.

A/N 471109 (D170)

The requested change in equipment description, from ‘steam’ to ‘internal’ heating coils, has no real impact on emissions as this merely clarify the mechanism on how the tank controls its operating temperature, which is limited to 400°F. The requested change to increase the temperature limit to 425°F from 400°F has been determined to have negligible impact on emissions based on calculations using EPA’s Tanks 4.09 program. The emissions analysis is summarized below and the detail Tanks 4.09 reports are contained in Attachment 1 for reference. Note that parameters used in the Tanks 4.09 program were based on tank

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parameters from previous A/N 371311 where a baseline emission of 2.0 lbs/day was established in NSR.

Uncontrolled Emissions:

Components	Losses (lbs/yr) at 400°F			Losses (lbs/yr) at 425°F			Δ (lbs/yr)
	Working Loss	Breathing Loss	Total Emissions	Working Loss	Breathing Loss	Total Emissions	
Asphalt	14,227	434	14,661	14,227	820	15,047	386

Controlled Emissions*:

Emissions at 400°F		Emissions at 425°F	
Lbs/yr	Lbs/day	Lbs/yr	Lbs/day
733	2.0	752	2.0

*Controlled Emissions = Uncontrolled Emissions (1 - 0.95); based on 95% control efficiency of water seal drum (considered BACT for asphalt tanks).

As shown above, there is no net change in emissions from this tank by increasing the temperature limit to 425°F from 400°F. Controlled emissions remain at 2.0 lbs/day.

EVALUATION:

PART 1 SCAQMD REGULATIONS

Rule 212	Standards for Approving Permits	November 14, 1997
	<p>The subject tanks under this evaluation meet all criteria in Rule 212 for PO issuance and are expected to operate without emitting air contaminants in violation of Division 26 of the State H&SC or in violation of AQMD rules and regulations. Public notice was not required per Rule 212 because it was determined in the PC evaluations that:</p> <ul style="list-style-type: none"> • R212(c)(1) – The subject permit units are well beyond 1000 feet from the outer boundary of a school. • R212(c)(2) – There is no emissions increase from any of subject tanks. • Rule 212(c)(3) – Without any emissions increase, there is no increase in MICR. <p>Compliance is expected.</p>	
Rule 401	Visible Emissions	November 9, 2001
	<p>Visible emissions are not expected under normal operating conditions. Compliance is expected.</p>	

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Rule 402	Nuisance	May 7, 1976
	Odor problems and nuisance complaints are not expected under normal operating conditions. Compliance is expected.	

Rule 463	Organic Liquid Storage	December 7, 1990
	<p>Paragraph (c) of this rule requires that tanks with a capacity of 39,630 gallons or greater used for storing organic liquid with a true vapor pressure of 0.5 psia or greater under actual storage conditions must be equipped with an external or internal floating roof or vapor recovery system with a 95% control efficiency.</p> <p>The subject tanks are connected to a water seal drum with 95% control efficiency even though the facility has demonstrated the vapor pressure of the asphalt product stored in the tanks is below the 0.5 psia threshold of this rule by the District approved Residual Storage Tank Vapor Pressure (RSVP) Method Version 1.2.1. The vapor pressure at actual operating temperature is below 0.1 psia. Please see Attachment 2 for reference.</p> <p>Even though this rule technically doesn't apply, compliance is still expected.</p>	

Rule 1178	Further Reduction of VOC Emissions from Storage Tanks at Petroleum Facilities	April 7, 2006
	<p>Paragraph (b) of this rule requires that fixed roof tanks with a capacity of 19,815 gallons or greater used for storing organic liquid with a true vapor pressure > 0.1 psia under actual storage conditions, located at any petroleum facility that emit >40,000 pounds (20 tons) per year of ROG in any emission inventory year beginning year 2000, must be vented to a control device with an overall control efficiency of 95% by weight or the tank emissions are vented to a fuel gas system.</p> <p>As stated above, the vapor pressure of the asphalt stored in the subject tanks is below the 0.1 psia. Therefore, the requirements of this rule are not applicable. Nonetheless, the tanks are connected to a water seal drum with 95% control efficiency. Compliance is expected even though this rule doesn't apply.</p>	

REG IX NSPS

Subpart K, Ka, Kb	Standards of Performance for Storage Vessels for Petroleum Liquids; for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels).	May 11, 2011
	According to the facility's initial Title V Permit Statement of Basis (SOB), the	

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subject tanks were constructed prior to 6-11-73 and has not been reconstructed or modified since then. Pursuant to 40CFR 60.14(a), the requested changes for T-1108, T-3001 and T-36001 did not result in any emissions increase and, hence, do not constitute a ‘modification’, which would have subjected the tank(s) to NSPS Subpart Kb. As such, the provisions of these rules do not apply. Nonetheless, as described above under Rule 463 and 1178, the tanks are connected to a vapor recovery system (water seal drum) for emissions control.

REG X NESHAP

40CFR 63, Subpart CC	National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries
	EOC has provided data to the District to show that the Long Beach facility is not a ‘major’ HAP source, which is defined as a source emitting 10 tons per year of any single HAP or 25 tons per year of all HAPs combined. As an ‘area’ HAP source emitting less than these thresholds, the facility is not subject to any major source Maximum Achievable Control Technology (MACT) Standards, including 40CFR 63, Subpart CC, except for the reporting and recordkeeping requirements of 40CFR 61, Subpart FF – National Emission Standard for Benzene Waste Operation. The Subpart FF requirements have been incorporated into the Title V permit as facility condition F16.1. Compliance is expected.

Reg XIII NSR

Rule 1303	Requirements	December 7, 1995
	<p>This rule specifies that the Executive Officer or designee shall deny the Permit to Construct for any new or modified source which results in a net emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia, unless BACT is employed, Modeling is used to demonstrate no significant change (increase) in quality concentration and Offsets are provided.</p> <p>According to the facility’s Statement of Basis (SOB) for its initial Title V permit issued in 2009, the subject tanks are pre-NSR that have not been reconstructed or modified since constructed prior to June 11, 1973. As pre-NSR tanks without throughput limits, only T-1108 and T-36001 will remain pre-NSR tanks because:</p> <ul style="list-style-type: none"> • Without any emissions increase, the connection to a water seal drum (control device) for T-1108 is not considered a modification of the tank and is exempt from Modeling and Offsets pursuant to Rule 1304(a)(5). Water seal drum is considered BACT for fixed roof asphalt tanks. • The increase in operating temperature for T-36001 is not a physical 	

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change to the tank but a change in operating condition, which was determined to have no impact on emissions. Hence, NSR does not apply.

For T-3001, the addition of heating coil is considered a modification of the tank pursuant to Rule 1302(x). Hence, an NSR event has occurred even though there is no net increase in emissions. As such, a throughput limit should be imposed to limit the monthly maximum emissions pursuant to Rule 1313(g). According to the District's NSR database, a baseline emission of 2.4 lb/day has been established for this tank. Using this baseline and factoring in the water seal drum with 95% control efficiency; uncontrolled emissions of 17,520 lbs/yr (2.4 lb/day x 365 day/yr ÷ 0.05) from the tank will result in no increase in emissions. Using the Tanks 4.09 program at a tank turnover of 365 per year (or 1 per day), the total uncontrolled emissions was not even close 17,520 lbs/yr (see Attachment 3 for emissions at 365 turnover). With such a high tank turnover allowed, adding a throughput limit to T-3001 is irrelevant and, hence, is neither necessary nor recommended.

Compliance with Reg XIII is expected.

Reg XIV

Rule 1401	NSR of Toxic Air Contaminants	September 10, 2010
	<p>As noted above, there is no emissions increase (of greater than 0.5 lb/day) of any nonattainment air contaminant from these modifications. Emissions should actually decrease with the installation of water seal drum for T-1108 and T-3001, while a negligible increase of 19 lbs/yr (0.05 lb/day) is expected for T-36001 for the increase in tank operating temperature from 400°F to 425°F. This negligible increase is not expected to have any impact on cancer risk (MICR), acute (HIA) and chronic (HIC) health indices at any receptor location.</p> <p style="text-align: center;">Compliance with Reg XIV is expected.</p>	

Reg XX

Rule 2005	NSR for RECLAIM	June 3, 2011
	<p>EOC is designated as a NOx and SOx RECLAIM facility. Since these tanks are not sources of NOx or SOx emissions, this regulation does not apply.</p>	

Reg XXX

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Rule 3002	Requirements	November 14, 1997
	<p>EOC has been designated as a Title V facility. The initial Title V permit was issued on October 1, 2009.</p> <p>Since the permit actions under A/Ns 471105, 471107 and 471109 are neither classified as Administrative, De Minimis Significant or Significant revision of the facility's Title V permit pursuant to Rule 3000, the changes will be made as a 'MINOR' TV permit revision. As a Minor revision, the proposed permits and a copy of the evaluation will be submitted to the EPA for review. Compliance is expected.</p>	

STATE REGULATIONS

CEQA	California Environmental Quality Act	
	<p>CEQA requires that the environmental impact of proposed projects be evaluated and that feasible measures to reduce, avoid or eliminate identified significant adverse impacts be considered. The CEQA Applicability Form (400-CEQA) submitted by the applicant for T-36001 indicates there are no adverse impacts expected which would trigger the preparation of a CEQA document. Since the 400-CEQA form was not found in the application folder for T-1108 and T-3001 but the modifications are similar to T-36001, no adverse impacts are expected for these two tanks also. Hence, CEQA analyses are not required for the three tanks.</p>	

CONCLUSION

Asphalt storage tanks 1108, 3001 and 36001 are expected to operate in compliance with all AQMD, State and Federal Rules and Regulations. Therefore, Permits to Operate are recommended with the conditions listed on pages 2 through 4 of this evaluation.

The following is a summary of the permit actions under this evaluation:

A/N	Equipment Description	Device ID	Recommended Action
471105	See draft permit on page 1 of evaluation.	D133	Approve PO
471107	See draft permit on page 1 of evaluation.	D147	Approve PO
471109	See draft permit on page 2 of evaluation.	D170	Approve PO