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	Thomas Lee	

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, P4/S7 and P4/S11 of the Title V facility permit.)

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: LOADING/UNLOADING					
System 7: SINGLE-POSITION ASPHALT TANK TRUCK LOADING, <u>RACK NO. 9</u>					
LOADING ARM, TANK TRUCK, TOP, ASPHALT, WITH A 6"-DIA FUME RECOVERY HOSE, <u>DISPLACED VAPOR RECOVERY HEAD</u> , (GRAVITY FED, RECESSED RAMP), <u>SEVEN ONE</u> TOTAL, DIAMETER: 4 IN A/N: 282431 <u>471110</u>	D103	C112		VOC: (9) [RULE 1108, 2-1-1985]	<u>C1.x, C6.x, D323.2</u>
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 282431 <u>471110</u>	D320				H23.13

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System 11: SINGLE-POSITION FUEL OIL / <u>DIESEL/KEROSENE</u> LOADING RACK NO. 6					
LOADING ARM, CHICKSAN SWING SPOUT, FUEL OIL, <u>DIESEL</u> , WITH EXTENDED DROP TUBE FOR PARTIAL SUBMERGED FILL, TWO TOTAL, <u>WITH FITTINGS FOR BOTTOM LOADING KEROSENE</u> DIAMETER 4IN A/N: <u>387884 471112</u>	D115				<u>B22.x</u>
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: <u>387884 471112</u>	D327				H23.13

CONDITIONS

B22.x The operator shall not use this equipment with materials having a(n) true vapor pressure of 1.5 psia or greater under actual operating conditions.

[RULE 1303(b)(1), 12-7-1995; RULE 462, 5-14-1999]

[Devices subject to this condition: D115]

C1.x The operator shall limit the throughput to no more than 1800 barrels in any one calendar day.

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

[Devices subject to this condition: D103]

C6.x The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 390 Deg F.

To comply with this condition, the operator shall measure and record the temperature of the asphalt being loaded whenever the loading rack is in operation.

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

[Devices subject to this condition: D103]

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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 a 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;
- 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]

H23.13 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR60, SUBPART	GGG
VOC	District Rule	1173

[RULE 1173, 5-13-1994; RULE 1173, 2-6-2009; 40CFR 63 Subpart GGG, 4-20-2006]

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[Devices subject to this condition : D202, D295, D302, D303, D304, D305, D306, D307, D308, D309, D310, D312, D313, D314, D315, D316, D317, D318, D319, D320, D321, D322, D326, D327, D329, D330, D331, D332, D364, D365, D383]

COMPLIANCE RECORD REVIEW

There are no outstanding compliance issues at Edgington Oil Company 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.

BACKGROUND

In June of 2007, EOC submitted applications to address issues that were found during the permit cleanup effort made in preparation for the facility’s initial TV permit. A/N 471110 was submitted for the single-position asphalt tank truck loading rack listed under P4/S7 and A/N 471112 was for the single-position fuel oil loading rack listed under P4/S11 of the TV facility permit. The applications were for permits to operate (PO) without obtaining permits to construct (PC).

P4/S7

This permit unit was initially permitted as a ‘recessed’ ramp operating with six 4” loading arms and six 6” fume recovery hoses for gravity loading of oxidized asphalt products from tanks 1103-1108 into tank trucks. The recovery hoses are vented to a Brink mist eliminator/filter (C112) for removal of any particulates that may be emitted during filling operations. In 1986, A/N 146364 was submitted to modify the rack by annexing a free-standing loading rack (also gravity load) with one 4” loading arm and one 6” recovery hose to accommodate wider and longer trucks that the existing recessed rack could not. The current PO for this permit unit, with a total of seven loading arms/recover hoses, was issued under A/N 282431 (Permit no. D74415) to EOC after several change of ownerships took place since 1986.

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In June of 2007, A/N 471110 was submitted by EOC to incorporate the latest changes made to P4/S7. Based on information submitted with the application, it appears the recessed ramp with the six loading arms/recovery hoses has been taken out of operations and only the free-standing loading rack is maintained, with the 6” fume recovery hose replaced with a “displaced vapor recovery head” connected to C112. EOC also requested to identify this permit unit as “Rack No. 9” under S7.

P4/S11

This single position loading rack was originally permitted to load ‘diesel’ but was changed to load ‘fuel oil’ (defined as Fuel Oil No. 1 to No. 6), as currently described in the permit, when an administrative change of condition application was submitted and approved under A/N 387884 in 2001. Because the vapor pressures of the two commodities are similarly low, no impact on emissions was determined when this change was made in 2001. In 2007, A/N 471112 was submitted by EOC to change the permit to add diesel back (in conjunction with fuel oil loading) and also include ‘kerosene’ to the products loaded at this rack in order to increase operational flexibility. As a pre-NSR loading rack, there is no throughput limit on the permit.

PERMIT HISTORY

The permitting histories of the 2 loading racks are summarized in the tables below:

Permit History for P4/S7 (D103, D320) (A/N 471110)

Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
C06564		M20572	11/18/81	C/O application. The C&C PO is dated 11/18/81 and “validation no. 42751, dated 7/22/76” on PO suggests rack was constructed prior to 1976. However, OnBase & PAATs show no previous application.
146364	10/22/86			Addition of single position stand-alone top fill loading rack with 4” loading arm and 6” fume recovery hose and associated pumps.
165752	5/10/89	D39304	6/24/91	Before project was completed, C/O took place and new operator submitted this C/O application for PC 146364.
282431	-	D74415	6/21/93	Change of ownership.
471110				PO no PC application to reflect only the single position free-standing loading rack with one loading arm/recovery ‘head’ is in

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				operation and the recessed ramp, with six loading arms/recovery hoses, has been taken out of service.
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Permit History for P4/S11 (D115, D327) (A/N 471112)

Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
C16555		M10312	4/25/80	No records found in OnBase
165764		M63624	5/26/88	Change of ownership.
283540		D75431	7/21/93	Change of ownership.
387884		F43456	8/23/01	Change of condition to replace 'diesel' with 'fuel oil' for commodity loaded.
471112				PO no PC application to reflect 'Diesel' and 'Kerosene' are also being loaded at this rack along with the permitted commodity 'Fuel Oil'.

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
471110	Asphalt Tank Truck Loading (1 rack)	214112	C	50	21	\$4,022.62	\$4,022.63
471112	Fuel Oil Tank Truck Loading (1 rack)	332112	C	60	21	\$4,022.62	\$4,022.63
Total						\$8,045.24	\$8,045.26

PROCESS DESCRIPTION

EOC is a topping refinery that primarily produces asphalt and heavy distillates from crude oils. Crude oil is fed to the atmospheric/vacuum units where it is separated into various fractions. The heavy distillates are sold to oil refineries for further processing into lighter products and 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 loading racks are for the transfer of asphalt product and heavy distillate fractions, from tankage, onto tank trucks for shipment to customers.

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EMISSIONS

A/N 471110

Under A/N 282431, the emissions for this permit unit was based on a maximum throughput of 1,800 barrels (75,600 gallons) of asphalt loading per day at 390°F. Since the maximum loading throughput and temperature will remain the same, the reduction in loading arms/recovery hoses from seven (7) to one (1) by the removal of the recessed ramp under this application (A/N 471110) should not affect loading emissions but is expected to reduce fugitive emissions. Since a physical modification was made even though there was no increase in emissions, a NSR event has occurred and, therefore, a throughput and temperature limit will be tagged to the permit to ensure emissions will not be impacted.

Since there are no emissions data in the District’s NSR database for this permit unit, the baseline emissions were calculated using emission factors in Section 5.2 (Transportation & Marketing of Petroleum Liquids) of EPA’s AP-42 for NSR entry. The following equation from Section 5.2.2.1.1 in AP-42 was used to calculate the emissions from this asphalt tank loading operation:

$$L = 12.46 \frac{SPM}{T} (1 - \frac{eff}{100})$$

Where:

L = loading loss, lb per 10³ gallons of liquid loaded

S = saturation factor (from Table 5.2-1) = 1.0 (splash loading with vapor balance)

P = tvp of liquid loaded, psia = 0.08 (based on RSVP Method in Attachment 1)

M = vapor molecular weight, lb/lb-mole = 130

T = temperature of bulk liquid loaded, °R (°F + 460) = 390 + 460 = 850

eff = overall reduction efficiency (95 % control x 98.7 % collection) = 94%

$$L = 12.46 \frac{(1)(0.05)(130)}{850} (1 - \frac{94}{100})$$

$$L = 0.0057 \text{ lb}/10^3 \text{ gallons loaded}$$

With a daily loading throughput limit of 1800 bbls (or 75,600 gallons = 75.6E3 gallons) pursuant to condition C1.x, the total loading losses are estimated to be:

$$L = (0.0057)(75.6) = 0.43 \text{ lb/day}$$

Hence, a baseline emission of 0.43 lb/day (0.018 lb/hr) of ROG has been entered in the District NSR data base for this permit unit.

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A/N 471112

Because of the inherently low vapor pressure of diesel and fuel oil, it was determined there is no impact on emissions when diesel was replaced by fuel oil in 2001 under administrative change of condition A/N 387884 . Therefore, adding diesel back into the mix does not cause a change in emissions as well. The addition of kerosene, which is another low vapor pressure product, also has no impact on emissions. Using ‘jet kerosene’ as a worst case analysis, the true vapor pressure at 100°F is 0.029 psia according to EPA AP-42, Table 7.1-2. Straight run kerosene is expected to be lower.

Note that the vapor pressure of the commodities under consideration is significantly below the applicability threshold of 1.5 psia for Rule 462 (Organic Liquid Loading) during actual loading conditions.

To establish the baseline emissions for this loading rack, the EPA AP-42 equation above was also used. Of the three permitted commodities, jet kerosene was used to provide a worst case scenario. A baseline emissions of 1.0 lbs/day (0.04 lb/hr) was calculated using a maximum loading throughput of 50,000 GPD (based on information in Reg III discussion contained in the application material submitted by EOC) and the following parameters:

- S = saturation factor (from Table 5.2-1) = 0.6 (submerged loading; dedicated normal service)
- P = tvp of jet kerosene at 70°F, psia = 0.011 (from Table 7.1-2 of AP-42)
- M = vapor molecular weight, lb/lb-mole = 130 (from Table 7.1-2 of AP-42)
- T = temperature of bulk liquid loaded, °R (°F + 460) = 70 + 460 = 530

This baseline (1.0 lbs/day) has been entered in the District NSR database.

EVALUATION:

PART 1 SCAQMD REGULATIONS

Rule 212	Standards for Approving Permits	November 14, 1997
	<p>The subject loading racks 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 the loading racks. Therefore, no increase in emissions greater than the daily 	

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	<p>maximum thresholds is expected.</p> <ul style="list-style-type: none"> • Rule 212(c)(3) – Without any emissions increase, there is no increase in MICR or acute/chronic hazard indices. <p>Compliance is expected.</p>
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Rule 401	Visible Emissions	November 9, 2001
	Visible emissions are not expected under normal operating conditions. Compliance is expected.	

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

Rule 462	Organic Liquid Loading	May 14, 1999
	<p>The commodities loaded at the subject loading racks have vapor pressures that are below the 1.5 psia applicability threshold of this rule under actual loading conditions. Hence, the requirements of this rule do not apply. Nonetheless, P4/S7 are equipped with a displaced vapor recovery head connected to air pollution control device C112 and P4/S11 are equipped with submerged fill tube and fittings for bottom loading to minimize emissions. Condition B22.x has been tagged to P4/S11 to ensure the commodities' vapor pressures do not trigger rule requirements since it's not connected to control.</p>	

REG IX NSPS

	There are currently no NSPS standards that apply to bulk loading/unloading terminal as outlined in the District's Regulation IX.
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REG X NESHAP

40CFR 63, Subpart CC	National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries	
	<p>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</p>	

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permit as facility condition F16.1. Compliance is expected.

40CFR 63, Subpart A⁷	National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing This rule limits PAH emissions to 0.003 lb/ton or PM emissions to 1.2 lb/ton of asphalt charged to the blowing stills at EOC. Pursuant to Table 4 of this subpart, ECO is utilizing its incinerator, B-501, to comply with this requirement and has indicated source test will be performed to demonstrate compliance as soon as asphalt blowing operations are resumed. According to an email from EOC dated 10/19/12 (contained in application folder 383221), the facility has not blown asphalt since the compliance date of 12/2/10. The upcoming source test will verify whether the current combustion zone temperature requirement of 1400°F set forth in condition C8.1 is sufficient to satisfy the monitoring requirement of § 63.11563. Compliance is expected. Note that although Subpart A ⁷ is applicable to the facility, the applicable requirements of this subpart do not apply to the two permit units under this evaluation.
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Reg XIII NSR

Rule 1303	Requirements	December 7, 1995
	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. Since the changes made to P4/S7 and P4/S11 did not result in any emissions increase, the requirements of this rule do not apply. However, as explained in the Emissions section of this evaluation, a throughput and temperature limit has been tagged to D103 of P4/S7 to ensure emissions will remain unchanged because of the physical modification made to the rack which is considered an NSR event per Rule 1302(x). Additionally, a vapor pressure limit has been tagged to D115 of P4/S11 to ensure there is no emissions impact from the added commodities. As discussed in the Emissions section, NSR baseline emissions of 0.43 lb/day and 1.0 lbs/day were established in the District NSR database using EPA AP-42 for P4/S7 and P4/S11, respectively. Compliance is expected.	

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Reg XIV

Rule 1401	NSR of Toxic Air Contaminants	September 10, 2010
	<p>As noted above, there is no emissions increase of any nonattainment air contaminant from these modifications. Emissions should actually decrease with the removal of six loading hoses/recovery hoses while maintaining the same throughput at P4/S7.</p> <p>Rule 1401(g)(1)(B) exempts equipment from the requirements of Rule 1401 if the modification of the permit unit causes a reduction or no increase in the cancer burden, maximum individual cancer risk (MICR), or acute (HIA) or chronic (HIC) health indices at any receptor location. Hence, the requirements of this rule are not applicable.</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

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 471110 and 471112 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, dated 6/26/07, indicates there are no adverse impacts expected which would trigger the preparation of a CEQA document. Hence, CEQA analyses are not required.</p>	

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CONCLUSION

The loading/unloading racks under P4/S7 and P4/S11 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 3 of this evaluation.

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

A/N	Equipment Description	Device ID	Recommended Action
471110	Single Position Asphalt Tank Truck Loading Rack No. 9 (see details on pg 1)	D103, D320	Approve PO
471112	Single Position Fuel Oil/Diesel/Kerosene Loading Rack No. 6 (see details on pg 1)	D115, D327	Approve PO