



South Coast
Air Quality Management District

Engineering Division
Application Processing & Calculations

PAGE 1	PAGES 5
APPL NO. 556741-44	DATE 10/14/2013
PROCESSED BY CGP	CHECKED BY <i>JY</i>

CHANGE OF CONDITION EVALUATION

APPLICANT:

Southern California Edison
2218 South 5th Ave
Monrovia, CA 91016
ID# 4477

EQUIPMENT LOCATION:

1 Pebbly Beach Road
Avalon, CA 90704

EQUIPMENT DESCRIPTION:

Section D of the SCE, Pebbly Beach Facility Permit, ID #4477 (proposed changes are shown in **bold underline** or **strikethrough**)

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
Process 3: Organic Chemical Storage					
STORAGE TANK, PRESSURIZED, NO. 605940, PROPANE, 30000 GALS, DIAMETER: 9 FT; LENGTH: 65 FT 11.38 IN A/N 366313 556741	D11				C1.1, <u>C157.1</u> , E57.1, K67.1
STORAGE TANK, PRESSURIZED, NO. 605939, PROPANE, 30000 GALS, DIAMETER: 9 FT; LENGTH: 65 FT 11.38 IN A/N 366312 556742	D12				C1.1, <u>C157.1</u> , E57.1, K67.1
STORAGE TANK, PRESSURIZED, NO. 605938, PROPANE, 30000 GALS, DIAMETER: 9 FT; LENGTH: 65 FT 11.38 IN A/N 366311 556743	D13				C1.1, <u>C157.1</u> , E57.1, K67.1
STORAGE TANK, PRESSURIZED, NO. 605937, PROPANE, 30000 GALS, DIAMETER: 9 FT; LENGTH: 65	D14				C1.1, <u>C157.1</u> , E57.1, K67.1



**South Coast
Air Quality Management District**

Engineering Division
Application Processing & Calculations

PAGE
2

PAGES
5

APPL NO.
556741-44

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
Process 3: Organic Chemical Storage					
FT 11.38 IN A/N 366310 556744					

BACKGROUND:

The following table shows the permitting history of the 4 propane tanks:

Equipment	Initial Permit/Apl No.	Modification Permit /Apl. No.
D11	D71765/277081	366313/F24761
D12	D71766/277082	366312/F24763
D13	D71767/277083	366311/F24764
D14	D71768/277084	366310/F24762

The initial permits were issued in 1993. SCE submitted modification applications in 2000 to adjust the PRV settings from 260 psi to 250 psi. These permits were issued in March 2000, and the equipment currently operates under those permits.

The tanks are currently required to maintain a PRV setting of 250 psi by permit condition. SCE is requesting that the PRV setting requirement be reduced to 232 psi. The purpose of the de-rate is to reduce the allowable operating pressures, which will increase the corrosion allowance on the tanks. The facility has submitted the following applications for this project:

Equipment	Appl No.	Bcat	Fee Sch	Fee
D11	556741	297908	A	\$725.03
D12	556742	297908	A (identical)	362.52
D13	556743	297908	A (identical)	362.52
D14	556744	297908	A (identical)	362.52
Title V Revision	556740	555009	C	1,824.90
			Expedited Processing	906.30
			Total	\$4,543.79

COMPLIANCE RECORD REVIEW:

The facility has received 2 NOV's in the last 12 months, summarized as follows:

Notice No.	Issue Date	Description
P52193	7/2/13	Unit 15 exceeded the start up limit of 25 lbs/hr
P52194	8/21/13	Failed to report a breakdown of D10 within 1 hour

Neither of the violations involve the propane tanks.



**South Coast
Air Quality Management District**

Engineering Division
Application Processing & Calculations

PAGE
3

PAGES
5

APPL NO.
556741-44

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PROCESS DESCRIPTION:

The tanks are each 30,000 gallon pressure vessels storing propane. SCE provides propane to its customers on Catalina Island for commercial and residential heating and cooking. There is no natural gas supply line from the mainland to Catalina.

The propane is received via barge, and the tanks are a maximum of 45 times per year by permit condition. *-turned-over*

EMISSIONS:

Emissions will not change as a result of these applications. Following is the estimate of emissions from the tanks based on calculations done for the previous applications. Reference Appendix A.

Pollutant	Maximum		30 Day Avg	Annual
	lbs/hr	lbs/day	lbs/day	lbs/yr
ROG	0.14	3.30	0.41	149

EVALUATION:

Rule 212 – Standards for Approving Permits

There are no schools within 1000 feet from the proposed equipment, and no increase in emissions. Therefore, no public notice is required.

Rule 401 – Visible Emissions

Visible emissions violations are not expected.

Rule 402 – Nuisance

Nuisance problems are not expected.

Rule 463 – Storage of Organic Liquids

The tanks are operated under pressure, and no emissions are expected under normal conditions.

Rule 466 – Pumps and Compressors

The compressor used to deliver the propane consists of a closed loop transfer system with a vapor return line. The equipment is expected to be adequately sealed and properly maintained.

Rule 466.1 – Valves and Flanges

Valves and flanges are expected to be maintained and inspected regularly to prevent leakage or breakdowns, in compliance with this rule.

Rule 467 – Pressure Relief Devices

Pressure relief devices are expected to be maintained and inspected regularly to prevent leakage or breakdowns, in compliance with this rule.



South Coast
Air Quality Management District
Engineering Division
Application Processing & Calculations

PAGE 4	PAGES 5
APPL NO. 556741-44	DATE 10/14/2013
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Regulation XIII – New Source Review

There is no emission increase from these applications, therefore NSR does not apply.

RECOMMENDATION:

Issue a Permit to Operate and include the tanks in Section D of the facility permit. The tanks will be subject to the following conditions. All conditions will remain the same except condition E157.1 which will be modified to reflect the 232 psi PRV setting.

CONDITIONS:

Proposed new condition language is shown in **bold underline**, conditions to be deleted are shown in ~~strikethrough~~, and all other conditions are existing and unchanged.

C1.1

The operator shall limit the number of turnovers to no more than 45 in any one year.

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

[Devices subject to this condition : D11, D12, D13, D14]

C157.1

The operator shall install and maintain a pressure relief valve set at ~~250~~ **232** psi

RULE 402, 5-7-1976]

[Devices subject to this condition : D11, D12, D13, D14]

E57.1

The operator shall vent this equipment to the unloading barge whenever the tank is being filled.

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

[Devices subject to this condition : D11, D12, D13, D14]

K67.1

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

throughput records

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

[Devices subject to this condition : D11, D12, D13, D14]



South Coast
Air Quality Management District

Engineering Division
Application Processing & Calculations

PAGE
5

PAGES
5

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Appendix A

Emissions

From the previous applications:

Each tank has one vapor compressor pump and 2 valves on the vapor return line (main valve and tank valve)

Emission factors from AQMD Form T-1 are used:

Pump 432 lbs/yr

Valves 47 lbs/yr

Applicant assumes 1 ft³ of ROG disconnect losses per delivery. This equates to 1.22E-05 lbs/delivery. There are 45 deliveries per year per tank.

$$\text{ROG} = (432*1) + (47*2) + (68.64) / 4 \text{ Tanks}$$

$$594.64 / 4 \text{ Tanks} = 148.66 \text{ lbs/yr}$$

$$148.66 / 45 = 3.30 \text{ lbs/day} = 0.14 \text{ lbs/hr}$$

$$30 \text{ Day Avg} = 3.30 \text{ lbs/day}[(45/12)/30] = 0.41 \text{ lbs/day}$$