

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 24	PAGE 1
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	PROCESSED BY Belinda C. Wan	CHECKED BY

PERMITS TO CONSTRUCT
STORAGE TANKS

COMPANY NAME EQUILON ENTERPRISES LLC, SHELL OIL PRODUCTS US
CARSON TERMINAL

MAILING ADDRESS 20945 SOUTH WILMINGTON AVENUE
CARSON, CA 90810

EQUIPMENT LOCATION 20945 SOUTH WILMINGTON AVENUE
CARSON, CA 90810

FACILITY ID 800372 (CYCLE 2)
;

CONTACT PERSON NOEL KURAI
(310) 816-2069

PROPOSED CHANGES TO PERMITS:

SECTION H: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

Proposed deletions are shown in ~~strikeouts~~. Proposed additions are SHOWN AS shown as underlined

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
Process 3: Storage Tanks					
System 2: Internal Floating Roof Tanks					S13.2
STORAGE TANK, INTERNAL FLOATING ROOF, NO. 506, 79183 BBL, DIAMETER: 117 FT 3 IN; HEIGHT: 41 FT 6 IN WITH A/N 411432 542999 FLOATING ROOF, PAN, RIVETED SHELL PRIMARY SEAL, CATEGORY A, MECHANICAL SHOE	D175				B22.5, <u>B59.4</u> , C1.17, C6.2 , C6.4, E71.8, <u>H23.11</u> , H23.13

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
SECONDARY SEAL, CATEGORY A, RIM MOUNTED, WIPER TYPE <u>COLUMN WELL, PIPE COLUMN WITH FLEXIBLE FABRIC SLEEVE SEAL, AND A RADAR GAUGE ATLG SYSTEM</u>					
STORAGE TANK, INTERNAL FLOATING ROOF, NO. 511, WITH A 25 HP MIXER, 79008 BBL; DIAMETER: 117 FT 2 IN; HEIGHT : 41 FT 5 IN WITH A/N 443364 543000 FLOATING ROOF, PAN, RIVETED SHELL PRIMARY SEAL, MECHANICAL SHOE SECONDARY SEAL, WIPER TYPE <u>COLUMN WELL, PIPE COLUMN WITH FLEXIBLE FABRIC SLEEVE SEAL, AND A RADAR GAUGE ATLG SYSTEM</u>	D176				B22.5, C1.17, C6.1, H23.13
STORAGE TANK, INTERNAL FLOATING ROOF, NO. 570, WITH A 20 HP MIXER, 80000 BBL; DIAMETER: 117 FT; HEIGHT : 41 FT 5 IN WITH A/N 397735 543011 FLOATING ROOF, PAN, RIVETED SHELL PRIMARY SEAL, LIQUID MOUNTED, MULTIPLE WIPER MECHANICAL SHOE SECONDARY SEAL, RIM MOUNTED <u>COLUMN WELL, PIPE COLUMN</u>	D183				B22.5, B59.4, C1.41, C6.3, C6.4 E71.8 H23.11, H23.13, K67.8

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
<u>WITH FLEXIBLE FABRIC SLEEVE SEAL, AND A RADAR GAUGE ATLG SYSTEM</u>					
STORAGE TANK, INTERNAL FLOATING ROOF, NO. 726, 115603 BBL, DIAMETER: 144 FT 1 IN; HEIGHT: 40 FT 1 IN, WITH A/N 413667 543017 FLOATING ROOF, PAN, RIVETED SHELL PRIMARY SEAL, CATEGORY A, MECHANICAL SHOE SECONDARY SEAL, CATEGORY A, RIM MOUNTED, WIPER TYPE <u>COLUMN WELL, PIPE COLUMN WITH FLEXIBLE FABRIC SLEEVE SEAL, AND A RADAR GAUGE ATLG SYSTEM</u>	D190				B22.5, B59.4, C1.17, C6.2, C6.4 E71.8 H23.13
STORAGE TANK, INTERNAL FLOATING ROOF, NO. 725, 115666 BBL; DIAMETER: 144 FT 3 IN; HEIGHT: 40 FT 2 IN, WITH A/N 413664 543016 FLOATING ROOF, PAN, RIVETED SHELL PRIMARY SEAL, CATEGORY A, MECHANICAL-SHOE SECONDARY SEAL, CATEGORY A, RIM MOUNTED, WIPER TYPE <u>COLUMN WELL, PIPE COLUMN WITH FLEXIBLE FABRIC SLEEVE SEAL, AND A RADAR GAUGE ATLG SYSTEM</u>	D750				B22.5, B59.4, C1.17, C6.2, C6.4 E71.8 H23.13
STORAGE TANK, INTERNAL FLOATING ROOF, TANK 562, WITH A 20 HP MIXER, 76534 BBL; DIAMETER: 117 FT 2 IN;	D146				B22.5, B59.4, C1.17,

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
HEIGHT: 41 FT 8 IN, WITH A/N 411179 543003 FLOATING ROOF, PAN, RIVETED SHELL PRIMARY SEAL, CATEGORY A, MECHANICAL SHOE SECONDARY SEAL, CATEGORY A, RIM MOUNTED, WIPER TYPE <u>COLUMN WELL, PIPE COLUMN WITH FLEXIBLE FABRIC SLEEVE SEAL, AND A RADAR GAUGE ATLG SYSTEM</u>					C6.3, C6.4 E71.8 H23.11, H23.13,
STORAGE TANK, INTERNAL FLOATING ROOF, TANK 563, 76534 BBL; DIAMETER: 117 FT 2 IN; HEIGHT: 41 FT 10 IN, WITH A/N 411180 543004 FLOATING ROOF, PAN, RIVETED SHELL PRIMARY SEAL, CATEGORY A, MECHANICAL SHOE SECONDARY SEAL, CATEGORY A, RIM MOUNTED, WIPER TYPE <u>COLUMN WELL, PIPE COLUMN WITH FLEXIBLE FABRIC SLEEVE SEAL, AND A RADAR GAUGE ATLG SYSTEM</u>	D171				B22.5, B59.4, C1.17, C6.3, C6.4 E71.8 H23.11, H23.13

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
STORAGE TANK, INTERNAL FLOATING ROOF, TANK 567, 79295 BBL; DIAMETER: 117 FT 2 IN; HEIGHT: 41 FT 10 IN, WITH A/N 448282 543008 FLOATING ROOF, PAN, RIVETED SHELL PRIMARY SEAL, CATEGORY A, MECHANICAL SHOE SECONDARY SEAL, CATEGORY A, RIM MOUNTED, WIPER TYPE <u>COLUMN WELL, PIPE COLUMN WITH FLEXIBLE FABRIC SLEEVE SEAL, AND A RADAR GAUGE ATLG SYSTEM</u>	D147				B22.5, <u>B59.4,</u> C1.17, <u>C6.3,</u> <u>C6.4</u> H23.11, H23.13, K67.8
STORAGE TANK, INTERNAL FLOATING ROOF, TANK 571, 79160 BBL; DIAMETER: 117 FT 2 IN; HEIGHT: 41 FT 10 IN, WITH A/N 399064 543012 FLOATING ROOF, PAN, RIVETED SHELL PRIMARY SEAL, CATEGORY A, MECHANICAL SHOE SECONDARY SEAL, CATEGORY A, RIM MOUNTED, MULTIPLE WIPER <u>COLUMN WELL, PIPE COLUMN WITH FLEXIBLE FABRIC SLEEVE SEAL, AND A RADAR GAUGE ATLG SYSTEM</u>	D149				B22.13, <u>B59.4,</u> C1.41, <u>C6.3,</u> <u>C6.4</u> H23.11, H23.13, K67.8

(10) Please refer to Section J of the facility permit for NESHAP/MACT requirements.

**Please refer to Sections F and G of the facility permit for the monitoring, recordkeeping, and reporting requirements.

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CONDITIONS:

The operator shall comply with the terms and conditions which are set forth below:

PROCESS CONDITIONS

None

SYSTEM CONDITIONS

S13.2 All devices under this system are subject to the applicable requirements of the following rules or regulations:

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

[**RULE 1149, 7-14-1995**; **RULE 1149, 5-2-2008**; **RULE 1178, 4-7-2006**; **RULE 463, 5-6-2005**]

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

DEVICE CONDITIONS

B. Material/Fuel Type Limits

B22.5 The operator shall not use this equipment with materials having a(n) true vapor pressure of 11.0 psia or greater under actual operating conditions.

[**Rule 1303(b)(2)-Offset, 5-10-1996, Rule 463, 5-6-2005**]

[Devices subject to this condition: D146, D147, D148, D150, D151, D152, D171, D174, D175, D176, D177, D178, D179, D180, D181, D182, D183, D184, D186, D187, D188, D189, D190, D191, D192, D193, D194, D195, D196, D197, D198, D199, D200, D201, D202, D203, D204, D356, D750]

B22.13 The operator shall not use this equipment with materials having a(n) true vapor pressure of 8.2 psia or greater under actual operating conditions.

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

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[Devices subject to this condition: D149]

B59.4 The operator shall only use the following material(s) for storage in this equipment:

- Gasoline and gasoline blend stocks (e. g. alkylate, iso-octane)
- Jet Fuel
- Diesel Fuel
- Ethanol/Denatured Ethanol
- Bio-equivalents (e. g. bio-diesel and bio-jet)
- Synfuels equivalents (e. g. shale oil, coal, tar sand derived gasoline, diesel, or jet)

[Rule 1303(b)(2)-Offset, 5-10-1996, Rule 463, 4-6-2005]

[Devices subject to this condition: D146, D147, D149, D150, D151, D171, D175, D177, D178, D183, D184, D186, D187, D190, D191, D194, D195, D196, D197, D198, D199, D200, D201, D202, D204, D355, D356, D750]

C. Throughput/Operating Limitation

C1.17 The operator shall limit the throughput to no more than 760,240 barrel(s) in any one calendar month.

~~Automatic tank level gauge (ATLG) shall be used to continuously measure the liquid surface level movement. Tank liquid surface level data shall be recorded every 15 minutes and these 15 minute levels will be used to calculate level changes. The 15-minute level readings shall be used to calculate the total one-way roof movement, in feet, on a monthly basis.~~

The operator shall calculate the throughput in barrels, by the following equation: $0.14 \times D \times D \times L$, where D is the diameter of the tank in feet and L is the total one-way liquid surface level roof travel in feet per month. ~~as determined by the 15minute level readings.~~

The operator shall install and maintain an automatic tank level gauge (ATLG) and recorder to continuously record the liquid surface level. For the purpose of this condition, continuous recording is defined as once every 15 minutes.

The operator shall calculate the total one-way liquid surface level, in feet, on a 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

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measurement by more than $\frac{1}{4}$ 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, throughput shall be determined by 15-minute tank level data averaged for the previous 30 days, prior to the discovery of the discrepancy.

~~The operator shall keep monthly records on the throughput and the Reid Vapor Pressure for each type of gasoline or Iso octane stored in the equipment.~~

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, throughput shall be determined by the 15-minute tank level data averaged for the previous 30 days, prior to the time that the ATLG went out of service.

~~In the case of a failure or shutdown of the measuring device and/or recorder, excluding routine maintenance, the requirement of this condition shall not apply for a period not to exceed 24 consecutive hours from the time of its occurrence. During the period of failure or shutdown, throughput shall be determined by 15 minute tank level data averaged for the previous 30 calendar days.~~

~~In the case of routine maintenance, the requirement of this condition shall not apply for a period not to exceed 4 hours in any calendar day. During the period of routine maintenance, throughput shall be determined by 15 minute tank level data averaged for the previous 30 calendar days.~~

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

[Devices subject to this condition: D146, D147, D171, D175, D176, D190, D750]

C1.41 The operator shall limit the throughput to no more than 760,417 barrel(s) in any one calendar month

The operator shall calculate the throughput in barrels, by 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 roof travel liquid surface level in feet per month.

The operator shall install and maintain an automatic tank level gauge (ATLG) and recorder to continuously record the liquid surface level vertical movement of the roof. For the purpose of this condition, continuous recording is defined as once every 15 minutes per hour.

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The operator shall calculate the total one-way liquid surface level ~~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 in service within 10 days. While the ATLG is being repaired, throughput shall be determined by the 15-minute ~~hourly~~ tank level data averaged for ~~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 in service within 10 days of the time that the ATLG failed or was removed from service for maintenance. While the ATLG is being repaired, throughput shall be determined by the 15-minute ~~hourly~~ tank level data averaged for ~~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: D149, D183]

- C6.1 The operator shall use this equipment in such a manner that the hydrocarbon concentration being monitored, as indicated below, does not exceed 50 percent of the Lower Explosive Limit.

The operator shall use an explosimeter or equivalent device to monitor the hydrocarbon concentration in the vapor space above the floating roof twice a year at 4 to 8 month intervals.

[Rule 1178, 14-7-2006; Rule 463, 5-6-2005]

[Devices subject to this condition: D176, D177, D178, D184, D186, D187, D194]

- C6.2 ~~The operator shall use this equipment in such a manner that the hydrocarbon concentration being monitored, as indicated below, does not exceed 30 percent of the Lower Explosive Limit.~~

~~The operator shall use an explosimeter or equivalent device to monitor the hydrocarbon concentration in the vapor space above the floating roof once every six months.~~

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[Rule 1178, 14-7-2006; Rule 463, 5-6-2005]

~~[Devices subject to this condition: D175, D190, D195, D196, D197, D356, D357, D750]~~

- C6.3 ~~The operator shall use this equipment in such a manner that the hydrocarbon concentration being monitored, as indicated below, does not exceed 30 percent of the Lower Explosive Limit.~~

~~The operator shall use an explosimeter to monitor the lower explosive limit (LEL) on a semi-annual basis.~~

[Rule 1178, 14-7-2006; Rule 463, 5-6-2005]

~~[Devices subject to this condition: D146, D147, D149, D171, D183]~~

- C6.4 The operator shall use this equipment in such a manner that the hydrocarbon concentration being monitored, as indicated below, does not exceed 30 percent of the Lower Explosive Limit.

The operator shall use an explosimeter or equivalent device to monitor the hydrocarbon concentration in the vapor space above the floating roof twice a year at 4 to 8 month intervals.

[Rule 1178, 14-7-2006; Rule 463, 5-6-2005]

[Devices subject to this condition: D146, D147, D149, D171, D183, D175, D190, D195, D196, D197, D198, D199, D200, D201, D204, D356, D357, D750]

D. Monitoring/Testing Requirements

None

E. Equipment Operation/Construction Requirements

- ~~E71.8 The operator shall only use this equipment for the storage of any of the following commodities: Alkylate, Diesel Fuel, Denatured Alcohol, Iso Octane, Jet Fuel and Gasoline.~~

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

~~[Devices subject to this condition: D146, D149, D175, D183, D171, D190, D202, D204, D750]~~

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H. Applicable Rules

H23.11 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40 CFR 60 Subpart	Kb

[40 CFR 60 Subpart Kb, 10-15-2003]

[Devices subject to this condition: D146, D147, D149, D171, D175, D183, D204]

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

Contaminant	Rule	Rule/Subpart
VOC	40 CFR 63 Subpart	R

[40 CFR 63 Subpart R, 4-6-2006]

[Devices subject to this condition: D146, D147, D149, D171, D175, D176, D177, D178, D183, D184, D186, D187, D190, D194, D195, D196, D197, D198, D199, D200, D201, D202, D204, D356, D357, D750]

K. Recordkeeping/Reporting

K67.5 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Throughput in barrels per month

Vapor pressure of stored liquid in psia

Other records that may be required to comply with the applicable requirements of District Rules 463 and 1178.

[RULE 1178, 4-7-2006, RULE 463, 5-6-2005]

[Devices subject to this condition: D204]

K67.8 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

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Tank throughput in barrels per month

Commodity/product stored and time period of its storage

True vapor pressure in psia of each commodity/product stored

Hydrocarbon concentration measurements done in the vapor space above the floating roof of the tank

Other records that may be required to comply with the applicable requirements of District Rules 463, 1149 and 1178 and 40 40CFR 63 Subpart R.

[RULE 1149, 7-14-1995, RULE 1149, 5-2-2008, RULE 1178, 4-7-2006, RULE 1303 (b)(2)-Offset, 5-10-1996, RULE 463, 5-6-2005, 40 CFR 63 Subpart R, 4-6-2006]

[Devices subject to this condition: D147, D149, D177, D178, D183, D184, D186, D187, D194, D195, D196, D197, D198, D199, D200, D201, D356, D357]

COMPLIANCE RECORD REVIEW:

A check with the AQMD Compliance Database shows that the facility has no open cases of violations covering these storage tanks during the last two years. The last Notice of Violation P55718 was issued on January 28, 2011 but this case has been closed on October 25, 2011. Christian Aviles conducted the last field inspection of the facility on August 22, 2012 and found that these storage tanks are operating in compliance with all of the permit conditions. These storage tanks were previously modified with the conversion of fixed roof tank to internal floating roof tanks, and with the upgrades of the rim seal systems and deck fittings. Thus, with these new modifications to change of the ATLG system from a mechanical system to a radar gauge system and the absence of open cases, these storage tanks are currently in compliance with District rules.

BACKGROUND:

Equilon Enterprises LLC dba Shell Oil Products with Facility ID 800372 operates a major storage and distribution facility for hydrocarbon fuels, ethanol and a variety of solvents at 20945 S. Wilimngton Avenue, Carson, CA 90810. All of the fuel and ethanol stored or distributed by this facility is brought in via pipeline. The facility ships out the majority of its stored product by pipeline and the balance is sent out by truck. There are two dedicated truck loading racks at this location, one for diesel and one of ethanol. The facility also operates chemical storage tanks which are used to store chemicals and solvents for an adjacent facility. These chemicals are brought to the facility primarily by railcar which is unloaded at Equilon. This facility was previously used for refining petroleum

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products, however the refining operations were shut down and removed in December 1991. The facility belongs to the Title V program and is designated as a Cycle II RECLAIM facility.

According to the New Source Review database, Equilon Enterprises LLC dba Shell Oil Products with Facility ID 800372 has a potential to emit 142 lb per day of NOx, 47 lb per day of CO, 6 lb per day of PM₁₀, 4 lb per day of SOx and 1881.2 lb per day of ROG. Equilon Enterprises LLC dba Shell Oil Products with Facility ID 800372 currently reports more than 20 tons per year of VOC specified by Table 2 of Rule 3001.

Equilon Enterprises LLC dba Shell Oil Products with Facility ID 800372 submitted the following nine applications to modify the current tanks automatic tank level gauge (ATLG) systems by the removal of the ATLG float-and-cable system and the installation of a radar gauge measurement systems for improved accuracy and reliability. The modification for the Title V and RECLAIM facility permit is under application no. 494230.

Table 1 – AQMD Applications Submitted

A/N	Equipment	Device ID	Type	Status	Dated Submitted	Requested Action	P/C Issue Date
542999	Storage Tank #506 with Internal Floating Roof	D175	50	20	September 18, 2012	• Removal of the ATLG float-and-cable system and the installation of a radar gauge ATLG system	
543000	Storage Tank #511 with Internal Floating Roof	D176	50	20	September 18, 2012	Removal of the ATLG float-and-cable system and the installation of a radar gauge ATLG system	
543003	Storage Tank #562 with Internal Floating Roof	D146	50	20	September 18, 2012	• Removal of the ATLG float-and-cable system and the installation of a radar gauge ATLG system	
543004	Storage Tank #563 with Internal Floating Roof	D171	50	20	September 18, 2012	• Removal of the ATLG float-and-cable system and the installation of a radar gauge ATLG system	
543008	Storage Tank #567 with Internal Floating Roof	D147	50	20	September 18, 2012	• Removal of the ATLG float-and-cable system and the installation of a radar	

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543011	Storage Tank #570 with Internal Floating Roof	D183	50	20	September 18, 2012	gauge ATLG system • Removal of the ATLG float-and-cable system and the installation of a radar gauge ATLG system
543012	Storage Tank #571 with Internal Floating Roof	D149	50	20	September 18, 2012	• Removal of the ATLG float-and-cable system and the installation of a radar gauge ATLG system •
543016	Storage Tank #725 with Internal Floating Roof	D750	50	20	September 18, 2012	• Removal of the ATLG float-and-cable system and the installation of a radar gauge ATLG system
543017	Storage Tank #726 with Internal Floating Roof	D190	50	20	September 18, 2012	• Removal of the ATLG float-and-cable system and the installation of a radar gauge ATLG system

FEE SUMMARY:

A request for expedited permit processing was submitted for these nine applications and these applications were processed with overtime work of seven hours on 4-15-2013. Equilon Enterprises LLC dba Shell Oil Products with Facility ID 800372 already paid for additional expedited permit processing fee of \$1,720.03 for each storage tank on September 18, 2012 .

The fees paid for these applications are shown in Table 2 below:

Table 2 – Fee Summary

A/N	Equipment	Type	Fee Sch.	Fee Required	Fee Paid
542999	Storage Tank #506 with Internal Floating Roof	50	C	\$5,160.09	\$5,160.09
543000	Storage Tank #511 with Internal Floating Roof	50	C	\$5,160.09	\$5,160.09
543003	Storage Tank #562 with Internal Floating Roof	50	C	\$5,160.09	\$5,160.09
543004	Storage Tank #563 with	50	C	\$5,160.09	\$5,160.09

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	Internal Floating Roof				
543008	Storage Tank #567 with Internal Floating Roof	50	C	\$5,160.09	\$5,160.09
543011	Storage Tank #570 with Internal Floating Roof	50	C	\$5,160.09	\$5,160.09
543012	Storage Tank #571 with Internal Floating Roof	50	C	\$5,160.09	\$5,160.09
543016	Storage Tank #725 with Internal Floating Roof	50	C	\$5,160.09	\$5,160.09
543017	Storage Tank #726 with Internal Floating Roof	50	C	\$5,160.09	\$5,160.09

PROCESS DESCRIPTION:

The current ATLG systems of the nine internal floating roof storage tanks consist of “float-and-cable” device that measure liquid level changes to determine product throughput. The applicant is proposing to replace current tanks float-and-cable ATLG systems with radar ATLG systems on the above nine storage tanks.

A new slotted pole will be installed on storage tanks nos. 506, 562, 567, and 570 while storage tanks nos. 511, 563, 571, 725 and 726 will use the existing roof fitting (slide guide-pole with float). Storage tanks nos. 506, 562, 567, and 570 will also have the same flexible enclosure over the newly-installed slotted pole. The “float-and-cable” measurement systems will be replaced by radar gauge measurements. The change in emissions result from the change of the slotted guidepole/sample well to a column well/pipe column with flexible fabric sleeve seal for each tank. Except for storage tank no. 571 identified as device D149 which is required to comply with permit condition B22.13, the other eight tanks are required to comply with permit condition B22.5. Condition B22.5 limits the true vapor pressure of the materials stored in the tanks to 11.0 psia under actual operating conditions while condition B22.13 limits the true vapor pressure of the materials stored in the tanks to 8.2 psia under actual operating conditions.

The project will consist of:

- Using the existing roof fitting (slotted guide-pole w/float).
- Removing the “float-and-cable” measurement system.
- Installing the radar gauge measurement system.

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- Replacing the current fitting "control" device (float) with an approved equivalent option (flexible enclosure) which is a slotted pole configurations & flexible cover.

The type measuring system has been added to the equipment descriptions to better clarify the type of measuring system that will be used for these tanks and is described below:

RADAR GAUGE, COLUMN WELL, PIPE COLUMN WITH FLEXIBLE FABRIC SLEEVE SEAL

These tanks currently have a slotted guide pole gasketed system with a float sleeve and wiper. When changing this system to a radar system, this guide pole will be converted to a pipe column well, using a flexible fabric sleeve to minimize emissions. See below for how the system will change.

The Radar Level Gauging System

The radar level gauging system works by using non-contact radar measurement system with no moving parts and only the antenna inside the tank atmosphere.

The type of radar system is a Frequency Modulated Continuous Wave (FMCW) system. The radar gauge transmits microwaves towards the surface of the liquid. The microwave signal has a continuously varying frequency around 10 GHz. When the signal has travelled down to the liquid surface and back to the antenna, it is mixed with the signal that is being transmitted at that moment. The frequency of the transmitted signal has changed slightly during the time it takes for the echo signal to travel down the surface and back again. When mixing the transmitted and the received signal the result is a signal with a low frequency proportional to the distance of the surface. This signal provides a measurement with high accuracy. The method is called the FMCW-method. This system will be installed in a hinged format so the still pipe can still be used for sampling.

Based on the information submitted by the applicant, this radar gauge system will meet or exceed all of the current requirements for ATLG systems for these internal floating roof tanks.

No other modifications will be performed to these tanks other than replacing the current ATLG systems with radar ATLG systems. However, there will be several changes in the equipment descriptions to better describe the tanks, and several conditions added/changed to better clarify requirements for these tanks. Conditions C6.2 and C6.3 will be consolidated into condition C6.4 and the devices with these conditions will be moved to condition C6.4 to eliminate schedule confusion and condition interpretation. To help clarify the types of materials that may be stored in the internal floating roof storage tanks, the facility requested that condition E71.8 be deleted and equipment moved to condition B59.4 (which allows storage of Bio- and Synfuel equivalents, where condition E71.8 does not address these materials. None of these changes will relax any of the requirements for these tanks.

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EMISSION CALCULATIONS:

For all the applications, the pre modification emissions in New Source Review are either entered as zero or different than what was calculated. This was because when the last change of ownership occurred for this equipment, zeros were entered in NSR. If the previous application did have emissions entered, they used a different version of the tanks program therefore the emissions are different. In order to make all the emissions consistent, the pre-modification and the post-modification emissions were calculated for all the tanks based on the information from Form 400-E-18 submitted together with the application.

EPA Tanks 4.09d program was used to perform the calculations for each tank for both pre-modification and post-modification emissions based on RVP of 15 psia for gasoline, except for storage tank no. 571 which was based on RVP of 12.0 psia for gasoline. The actual EPA 4.09d spreadsheets are included in the application folders. All of the throughputs for each tank are the same for both post-modification and pre-modification emissions. Based on the pre-modification and post-modification emissions, there will be an overall net decrease in emissions for all the tanks being modified. Therefore no offsets will be required. The proposed emissions from these tanks after these modifications to replace the current ATLG systems with radar ATLG systems are shown in Table 4 and will also be equal to the current emissions from these tanks before these modifications since the net emission change for these modifications is a decrease of only 0.85 lb per day for the nine tanks.

The post modification emissions will be entered into the current applications. Table 4 shows that the pre-modification emissions can be assumed to be equal to post modification emissions due to the slight VOC emission decrease of only 0.85 lb per day for the nine tanks. Therefore post-modification emissions will also be entered into NSR for the previous applications.

Below is a summary of the pre-modification emissions, post-modification emissions, and the difference. The proposed modifications reduce VOC emissions as shown by Table 4. Table 4 will be used as the basis for the NSR entries as specified by Form 400-E-18.

1. Application No. 542999 – Storage tank No. 506 with Internal Floating Roof, Device D175
2. Application No. 543000 – Storage tank No. 511 with Internal Floating Roof, Device D 176
3. Application No. 543003 – Storage tank No. 562 with Internal Floating Roof, Device D 146
4. Application No. 543004 – Storage tank No. 563 with Internal Floating Roof, Device D 171
5. Application No. 543008 – Storage tank No. 567 with Internal Floating Roof, Device D 147
6. Application No. 543011 – Storage tank No. 570 with Internal Floating Roof, Device D 183
7. Application No. 543012 – Storage tank No. 571 with Internal Floating Roof, Device D 149

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8. Application No. 543016 – Storage tank No. 725 with Internal Floating Roof, Device D 750

9. Application No. 543017 – Storage tank No. 726 with Internal Floating Roof, Device D 190

Operating schedule: 24 hours per day, 7 days per week, 52 weeks per year

Emission calculations from EPA Tanks 4.09d program show August as the month with the highest emissions for each nine storage tank and used as the basis of comparison for emissions before and after modifications as tabulated below:

Table 4 – Summary of Emission Increases/Decreases (RVP)

Storage Tank No.	Pre-Modification Emissions		Post Modification Emissions		Emissions Increase/Decrease	
	lb/month	lb/day	lb/month	lb/day	lb/month	lb/day
506	1052.57	35.09	1066.51	35.55	13.94	0.46
511	1068.94	35.63	1044.96	34.83	-23.98	-0.80
562	1061.20	35.37	1075.14	35.84	13.94	0.46
563	1073.36	35.78	1058.02	35.27	-15.34	-0.51
567	1077.80	35.93	1091.74	36.39	13.94	0.46
570	1077.29	35.91	1091.29	36.38	14	0.47
571	796.52	26.55	785.40	26.18	-11.12	-0.37
725	1245.22	41.51	1229.88	41.00	-15.34	-0.51
726	1245.11	41.50	1229.78	40.99	-15.33	-0.51
Total		323.27		322.43		

Total VOC emission increase = 0.46 + 0.46 + 0.46 + 0.47 = 1.85 lb/day

Total VOC emission decrease = 0.80 + 0.51 + 0.37 + 0.51 + 0.51 = 2.70 lb/day

Net VOC emission decrease for the nine storage tanks = 2.70 - 1.85 = 0.85 lb/day

The primary difference in emissions between previous and current applications appear to be the result of updating the roof fittings in the current applications to reflect actual configurations, as the previous applications may have used typical fittings/counts. In the previous applications, gasoline vapor pressures were set based on the typical (CARB) RVP schedule which also are the basis for the current applications for reasons of consistency to determine net emissions change.

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The previous NSR emissions entered for the above storage tanks are listed below but will be updated to reflect the current emissions based on the actual number and type of deck fittings shown on Form 400-E-18 for the nine internal floating roof storage tanks and the Reid vapor pressures previously used for past modifications and the current version of EPA Tanks 4.09d program to calculate VOC emissions from the operation of the storage tanks.

Equilon Enterprises LLC dba Shell Oil Products with Facility ID 800372 provided ERC of 25 lb per day of ROG to offset the VOC emission increase from the previous modification of storage tank no. 563 under AN 411180, ERC of 26 lb per day of ROG to offset the VOC emission increase from the previous modification of storage tank no. 571 covered under A/N 399064, and ERC of 30 lb per day of ROG to offset the VOC emission increase from the previous modification of storage tank no. 567 covered under A/N 448282.

Table 5 – NSR Emissions Before and After Modification

Storage Tank No.	NSR VOC Emissions	
	Previous, lb/day	Current
506	A/N 411432: 22.62	A/N 542999: 34.80 lb/day = 1.45 lb/hr
511	A/N 443364: 40.9	A/N 543000: 34.56 lb/day = 1.44 lb/hr
562	A/N 411179: 22.59	A/N 543003: 35.52 lb/day = 1.48 lb/hr
563	A/N 411180: 21.03	A/N 543004: 35.04 lb/day = 1.46 lb/hr
567	A/N 448282: 26.12	A/N 543008: 36.24 lb/day = 1.51 lb/hr
570	A/N 397735: 23.9	A/N 543011: 36.24 lb/day = 1.51 lb/hr
571	A/N 399064: 22.8	A/N 543012: 26.16 lb/day = 1.09 lb/hr
725	A/N 413664: 30.05	A/N 543016: 40.80 lb/day = 1.70 lb/hr
726	A/N 413667: 30.05	A/N 543017: 40.80 lb/day = 1.70 lb/hr
Total	240.06	320.16

10. Application No. 494230 - Minor Title V Permit Revision

Application no. 366926 was submitted on March 3, 2000 for an initial Title V Facility Permit and initial Title V Facility Permit was issued effective June 8, 2009. Application no. 366926 was submitted on March 3, 2000 for an initial Title V Facility Permit and initial Title V Facility Permit was issued effective June 8, 2009. Application no. 494230 was submitted on January 16, 2009 for a Title V/RECLAIM permit revision which will be used for these modifications. The proposed modifications of the internal floating roof storage tanks to change the ATLG system from a mechanical system to a radar gauge system qualify as a minor permit revision since the modifications result in emission decreases as shown by Table 4. As a minor Title V revision, it requires only a 45-day EPA review and no public notice distribution and participation.

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RULES EVALUATION:

Modification of the nine storage tanks by the removal an ATLG float-and-cable system and the installation of a radar gauge ATLG system and replacing the slotted guidepole/sample well with a column well/pipe column with flexible fabric sleeve seal is expected to comply with AQMD, State, and Federal Rules and Regulations.

Specific compliance with the following rules is discussed below:

PART I SCAQMD REGULATIONS

Rule 212
11/14/97

Standards for Approving Permits and Issuing Public Notices

Rule 212 requires public notice for the construction of a new source at a facility if 1) it is located within 1000 feet of a school; 2) any emission increase exceeds the daily maximums as specified in subsection (g) of this rule; or 3) any emission increase in toxic air contaminants for which a person may be exposed to a Maximum Individual Cancer Risk (MICR) of 1 in a million or greater. A public notice is not required here because the source is not located within 1000 feet of a school. Furthermore, no emission increase is expected from the modifications of the internal floating roof storage tanks. Public notice is not required for any of the tanks modifications for the issuance of the Permits to Construct.

Rule 401
11/09/01

Visible Emissions

Based on experience with similar equipment, operation of the internal floating roof storage tanks after the modifications is expected to comply with visible emission limits. The tanks automatic tank level gauge (ATLG) systems of the nine storage tanks located at the Carson terminal of Equilon Enterprises LLC dba Shell Oil Products US will be modified by the removal an ATLG float-and-cable system and the installation of a radar gauge ATLG system and replacing the slotted guidepole/sample well with a column well/pipe column with flexible fabric sleeve seal. The proposed modifications reduce VOC emissions as shown by Table 4.

Rule 402
05/07/76

Nuisance

This rule prohibits the discharge of air contaminants that cause injury, detriment, nuisance, or annoyance to a considerable number of persons; endanger the comfort, health or safety of any person; or cause injury to property. These internal floating roof storage tanks after the modifications are not expected to cause nuisance complaints under normal operation. No nuisance complaints have been issued for these tanks. Thus, compliance has been expected.

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Rule 463

05/06/05

Organic Liquid Storage

This rule applies to any above-ground tank with a capacity of 19,815 gallons or greater used for storing organic liquids or with a capacity of 251 gallons or greater used for storing gasoline. All of the fixed roof tanks which are equipped with an internal floating-type cover have a closure device which consists of a mechanical shoe as a primary seal and rim-mounted secondary seal. The tanks automatic tank level gauge (ATLG) systems of the nine storage tanks located at the Carson terminal of Equilon Enterprises LLC dba Shell Oil Products US will be modified by the removal an ATLG float-and-cable system and the installation of a radar gauge ATLG system and replacing the slotted guidepole/sample well with a column well/pipe column with flexible fabric sleeve seal. The proposed modifications reduce VOC emissions as shown by Table 4.

Rule 1149

05/02/08

Storage Tank Cleaning and Degassing

This rule requires certain practices be followed to control emissions whenever a tank used for storing organic compounds is cleaned or degassed. Emissions from above ground tanks are required to be controlled by one of the following methods: liquid balance, negative pressure displacement and subsequent incinerations, vapor condensation with a refrigeration system, or any other method which controls VOC by at least 90%. A permit condition requires continued compliance with this rule.

Rule 1173

02/06/09

Fugitive Emissions of Volatile Organic Compounds

This Rule specifies leak control, identification, operator inspection, maintenance, and recordkeeping requirements for valves pumps, compressors, pressure relief valves, and other components from which fugitive VOC emissions may emanate. Since this project does not involve a change to any component outside of the storage tanks, no change in fugitive VOC emissions is expected.

Rule 1178

04/07/06

Further Reductions of VOC Emissions from Storage Tanks at Petroleum Facilities

This rule applies to facilities with VOC emissions that exceed 20 tons per year. After reviewing the 2012 AER emissions, the emissions exceeded 20 tons per year therefore this tank is required to comply with this rule. This rule requires certain storage tanks to have approved seals and fittings installed in their tanks that contain at least 19,815 gallons of volatile organic compounds and that have true vapor pressures greater than 0.1 psia. Pursuant to the requirements of this rule, the tanks automatic tank level gauge (ATLG) systems of the nine storage tanks located at the Carson terminal of Equilon Enterprises LLC dba Shell Oil Products US will be modified by the removal an ATLG float-and-cable system and the installation of a radar gauge ATLG system and replacing the slotted guidepole/sample well with a column well/pipe column with flexible fabric sleeve seal. The proposed modifications reduce VOC emissions as shown by Table 4.

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Reg. XIII
12/06/02

New Source Review for VOC, CO, PM₁₀, and NH₃ Emissions

This rule applies to new, modified, or relocated sources that increase emissions of any nonattainment air contaminants, ammonia, or ozone-depleting compounds. Because no emission increase of these contaminants is expected from the storage tanks modifications, New Source Review (NSR) does not apply. The modifications of these storage tanks would reduce VOC emissions through the installation of a radar gauge ATLG system and replacing the slotted guidepole/sample well with a column well/pipe column with flexible fabric sleeve seal. The proposed modifications reduce VOC emissions as shown by Table 4.

The requirements of Rule 1303 of

Rule 1303
12/06/02

BACT is not triggered when the storage tanks modifications result in VOC emission decreases as shown by Table 4. Since the proposed modifications of the storage tanks will result in VOC emission decreases, offsets are not required for the issuance of the permits to construct. All of the fixed roof tanks which are equipped with an internal floating-type cover have a closure device which consists of a mechanical shoe as a primary seal and rim-mounted secondary seal..

Rule 1303: Requirements

Rule 1303(a) – Best Available Control Technology

Since this project results in a reduction in VOC emissions, BACT requirements do not apply.

Rule 1303(b)(1) - Modeling

VOC emissions are not required to be modeled.

Rule 1303 (b)(2) – Emissions Offsets

Since this project results in a reduction in VOC emissions, therefore, offsets are not required.

Rule 1303 (b)(4) – Facility Compliance

The subject facility complies with all applicable rules and regulations of the District.

Reg. XIV
09/10/10

Toxics

Rule 1401 New Source Review of Toxic Air Contaminants

Since all the modifications result in either no change or a net decrease in emissions no health risk assessments are required because there is no increase in toxic emissions due to these modifications. Health risk assessments from the operation of the storage tanks performed before these modification showed that cancer risk and

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acute and chronic hazard index comply with the limits specified by Rule 1401. There will be no increase in toxic air contaminants due to these modifications. Compliance with this rule is expected because emissions of toxic air contaminants from the operation of the storage tanks remain the same before and after modification.

Reg. XX
05/06/05

Regional Clean Air Incentives Market (RECLAIM)

BP West Coast Products LLC, BP Carson Refinery with Facility ID 131003 is both NOx and SOx Cycle II RECLAIM facility. It is therefore subject to Reg XX. However, RECLAIM does not apply to the internal floating roof storage tanks since there are no emissions of NOx and SOx from the operation of the storage tanks.

Reg. XXX
11/05/10

Title V Permits

The Title V Permit System is implemented in accordance with Title V of the 1990 Amendments to the Federal Clean Air Act. Application no. 366926 was submitted on March 3, 2000 for an initial Title V Facility Permit and initial Title V Facility permit was issued effective June 8, 2009. Modifications of the internal floating roof storage tanks by the removal an ATLG float-and-cable system and the installation of a radar gauge ATLG system and replacing the slotted guidepole/sample well with a column well/pipe column with flexible fabric sleeve seal qualify as a minor permit revision since the modifications result in emission decreases as shown by Table 4. As a minor Title V revision, it requires only a 45-day EPA review and no public notice distribution and participation.

PART II

STATE REGULATIONS

CEQA

California Environmental Quality Act

CEQA requires that the environmental impacts of proposed projects be evaluated and that feasible methods to reduce, avoid, or eliminate identified significant adverse impacts of these projects be considered.

Because these applications for modifications of the internal floating roof storage tanks result in emission decreases as shown by Table 4, no further CEQA review is required.

PART III

FEDERAL REGULATIONS

40CFR Part 60
Subpart Kb

Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commences after July 23, 1984

Because these modifications of the internal floating roof storage tanks result in emission decreases as shown by Table 4, operation of these storage tank is expected

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to comply with 40 CFR 60 Subpart Kb. These tanks are already equipped with internal floating roof and monitoring conditions to maintain records of the type of material stored, the time of storage and the maximum true vapor pressure of the liquid ensures continued compliance with this rule.

40CFR 63
Subpart R

National Emissions Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals And Pipeline Breakout Stations)

The gasoline side of this facility qualifies as a pipeline breakout terminal since there is not any tank truck or railcar loading or unloading racks. Gasoline is transferred into and out of the storage tanks at the facility via pipeline. The only rack on the gasoline side of this facility is an ethanol unloading rack. Because the operations at this facility involve gasoline loading/unloading activities or pipeline breakout, this regulation applies to this facility. This subpart which applies to the gasoline storage tanks on the fuels side of this facility, specifies seal inspection, reporting, record keeping, and maintenance requirements.

AQMD Rule 463, 1149 and Rule 1178 along with deck fittings upgrades already installed for these tanks helps ensure compliance with this regulation. Therefore, compliance with this regulation is expected.

CONCLUSION:

Based on the evaluation above, these tanks are expected to comply with AQMD, State, and Federal Rules and Regulations. Permits to Construct are recommended with the conditions listed in the Conditions Section of this evaluation.