



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

STATIONARY SOURCE COMPLIANCE DIVISION

APPLICATION PROCESSING AND CALCULATIONS

PAGES
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APPL. NO.
542538 & 542539

DATE
10/03/12 rev

PROCESSED BY
R. Sanford

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**Permit to Operate / No Permit To Construct
- Modification -
A/Ns 542538 and 542539**

COMPANY NAME: Chevron Products Company

MAILING ADDRESS: 324 W. El Segundo Blvd.
El Segundo, CA 90245

EQUIPMENT LOCATION: 324 W. El Segundo Blvd.
El Segundo, CA 90245

BACKGROUND / SUMMARY:

Sometime in the past, Chevron modified the pontoon roofs on Domed External Floating Roof Storage Tank Nos. 182 (D1358) and 183 (D1359) without first obtaining a permit to construct. The changes to the roofs are summarized in the table below.

Roof Opening/Fitting or Seal	Tank 182		Tank 183	
	New	Old	New	Old
Access Hatch (Bolted Cover, Gasketed)	2	2	3	3
Automatic Gauge Float Well (Bolted Cover, Gasketed)	1	1	1	1
Gauge Hatch-Sample Well (Weighted Mechanical Actuation, Gasketed)	2	2	2	2
Vacuum Breaker (Weighted Mechanical Actuation, Gasketed)	1	1	2	2
Deck Drain (3 in. Diameter/90% Closed)	1	0	3	3
Sample Pipe or Well (24 in. Diameter)	0	3	0	0
Roof Leg (Adjustable, Pontoon Area, Sock)	24	24	16	21
Roof Leg (Adjustable, Center Area, Sock)	36	36	13	8
Slotted Guidepole (Gasketed Sliding Cover w/Pole Sleeve and Wiper)	1	1	0	1
Slotted Guidepole (Gasketed Sliding Cover w/Float, Pole Sleeve & Wiper)	0	0	1	0
Primary Seal/Mechanical Shoe	1	1	1	1
Secondary Seal/Rim Mounted	1	1	1	1

Chevron also requests to replace “Category B or Better” with “Category A” in the secondary seal description for Tank 182 and modify the vapor pressure and throughput limits for these tanks as follows:

- Increase the Tank 182 vapor pressure limit in condition D22.21 from 9.5 psia to 10.99 psia.
- Increase the Tank 183 vapor pressure limit in condition E71.42 from 9 psia to 10.99 psia.



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- Increase the Tank 183 throughput limit in condition C1.104 from 1,146,680 bbl/month to 1,250,000 bbl/month.

EQUIPMENT DESCRIPTION:

The subject storage tanks are currently listed in Section D of the RECLAIM/Title V Facility Permit. A permit to operate is proposed for issuance in Section D of the RECLAIM/Title V Facility Permit. The proposed permit pages are contained in this section. In these proposed permit pages, new text is indicated by underline and deleted text is indicated by strikethrough. Modified conditions are indicated by parenthesis.

Section D: Facility Description and Equipment Specific Conditions

Description	ID No.	Connected To	RECLAIM Source Type	Emissions and Requirements	Conditions
Process 16: Storage Tanks					P13.1
System 10: Domed External Floating Roof Tank					S13.9, S31.15, S31.20
STORAGE TANK, DOMED EXTERNAL FLOATING ROOF, NO. 182, WITH TWO MIXERS, 147750 BBL; DIAMETER: 140 FT ; HEIGHT: 55 FT 8 IN WITH DOME COVER, GEODESIC FLOATING ROOF, PONTOON, WELDED SHELL PRIMARY SEAL, CATEGORY A, METALLIC SHOE SECONDARY SEAL, CATEGORY B OR BETTER A , RIM MOUNTED GUIDEPOLE, SLOTTED, WITH GASKETED SLIDING COVER, POLE SLEEVE, AND POLE WIPER A/N: 437663 <u>542538</u>	D1358			HAP: (10) [40CFR 63 Subpart CC, #3A, 6-23-2003]	B22.8, B22.21, C1.118, D90.36, E71.9, H23.10, K67.32, K67.62
STORAGE TANK, DOMED EXTERNAL FLOATING ROOF, NO. 183, WELDED SHELL, WITH TWO MIXERS, 159379 BBL; DIAMETER: 150 FT ; HEIGHT: 53 FT 8 IN WITH DOME COVER, GEODESIC FLOATING ROOF, PONTOON PRIMARY SEAL, CATEGORY A, METALLIC SHOE SECONDARY SEAL, CATEGORY B OR BETTER A , RIM MOUNTED GUIDEPOLE, SLOTTED, WITH GASKETED SLIDING COVER, FLOAT , POLE SLEEVE, AND POLE WIPER A/N: 437665 <u>542539</u>	D1359			HAP: (10) [40CFR 63 Subpart CC, #3A, 6-23-2003]	B22.8, (C1.104), D90.36, E71.9, E71.42, K67.58, (K67.62)

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PROCESS CONDITIONS

P13.1 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Benzene	40CFR61	Subpart FF

[**40CFR 61 Subpart FF, 12-4-2003**]

[Processes subject to this condition: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, **16**]

SYSTEM CONDITIONS:

S13.9 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

For Rule 463 applicability, only subdivision (d) in the March 11, 1994 amendment, or equivalent requirements in the future amendments, shall apply to domed external floating roof tanks. This does not preclude any requirements specified in Rule 1178.

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

[Systems subject to this condition: **Process 16, System 10**]

S31.15 The following BACT requirements shall apply to VOC service fugitive components associated with the devices that are covered by application number(s) 378811, 380595, 380596, 380597, 380611, 385372, 385373, 385374 and 475142:

The operator shall provide to the District, no later than 60 days after initial startup, a recalculation of the fugitive emissions based on actual components installed and removed from service. The valves and flanges shall be categorized by size and service. The operator shall submit a listing of all new non-bellows seal valves which shall be categorized by tag no., size, type, operating temperature, operating pressure, body material, application, and reasons why bellows seal valves were not used.

All new valves in VOC service, except those specifically exempted by Rule 1173, shall be bellows seal valves, except as approved by the District, in the following applications: heavy liquid service, control valve, instrument piping/tubing, applications requiring torsional valve stem motion, applications where valve failure could pose safety hazard (e.g., drain valves with valve stems in horizontal position), retrofits/special applications with space limitations, and valves not commercially available.

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All new valves and major components in VOC service as defined by Rule 1173, except those specifically exempted by Rule 1173 and those in heavy liquid service as defined in R1173, shall be distinctly identified from other components through their tag numbers (e.g., numbers ending in the letter "N"), and shall be noted in the records.

All new components in VOC service as defined in Rule 1173, except valves and flanges, shall be inspected quarterly using EPA reference Method 21. All new valves and flanges in VOC service, except those specifically exempted by Rule 1173, shall be inspected monthly using EPA Method 21.

If 98.0 percent or greater of the new (non-bellows seal) valves and the new flange population inspected is found to leak gaseous or liquid volatile organic compounds at a rate less than 500 ppmv for two consecutive months, then the operator may change to a quarterly inspection program with the approval of the District.

The operator shall revert from quarterly to monthly inspection program if less than 98.0 percent of the new (non-bellows seal) valves and the new flange population inspected is found to leak gaseous or liquid volatile organic compounds at a rate less than 500 ppmv.

All new components in VOC service with a leak greater than 500 ppmv but less than 1,000 ppmv, as methane, measured above background using EPA Method 21 shall be repaired within 14 days of detection. Components shall be defined as any valve, fitting, pump, compressor, pressure relief valve, diaphragm, hatch, sight-glass, and meter, which are not exempted by Rule 1173.

The operator shall keep records of the monthly inspection (quarterly where applicable), subsequent repair, and reinspection, in a manner approved by the District. Records shall be kept and maintained for at least five years, and shall be made available to the Executive Officer or his authorized representative upon request.

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

[Systems subject to this condition : Process 1, System 18; Process 3, System 5; Process 4, System 3 , 4; Process 8, System 8; Process 14, System 28; **Process 16, System 8, 10**]

S31.20 The following BACT requirements shall apply to VOC service fugitive components associated with the devices that are covered by application number(s) 466876, 467141, 467544, 470739, 470782 and 526607:

All sampling connections shall be closed-purge, closed loop, or closed-vent systems.

All new valves in VOC service shall be leakless type, except those specifically exempted by Rule 1173 or approved by the District in the following applications: heavy liquid service, control valves, instrument piping/tubing, applications requiring torsional valve stem motion, applications where valve failure could pose safety hazard (e.g., drain valves with valve stems in horizontal position), retrofits/special applications with space limitations, and valves not commercially available.

For the purpose of this condition, leakless valve shall be defined as any valve equipped with sealed bellows or equivalent approved in writing by the District prior to installation.



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All new components in VOC service as defined by Rule 1173, except valves and flanges shall be inspected quarterly using EPA Reference Method 21. All new valves and flanges in VOC service except those specifically exempted by Rule 1173 shall be inspected monthly using EPA Method 21. Components shall be defined as any valve, flange, fitting, pump, compressor, pressure relief device, diaphragm, hatch, sight-glass, and meter, which are not exempted by Rule 1173.

The following leaks shall be repaired within 7 calendar days -- all light liquid/gas/vapor components leaking at a rate of 500 to 10,000 ppm, heavy liquid components leaking at a rate of 100 to 500 ppm and greater than 3 drops/minute, unless otherwise extended as allowed under Rule 1173.

The following leaks shall be repaired within 2 calendar days -- any leak between 10,000 to 25,000 ppm, any atmospheric PRD leaking at a rate of 200 to 25,000 ppm, unless otherwise extended as allowed under Rule 1173.

The following leaks shall be repaired within 1 calendar day -- any leak greater than 25,000 ppm, heavy liquid leak greater than 500 ppm, or light liquid leak greater than 3 drops per minute.

If 98.0 percent or greater of the new valve and the new flange population inspected is found to leak gaseous or liquid volatile organic compounds at a rate less than 500 ppmv for two consecutive months, then the operator may revert to a quarterly inspection program with the approval of the Executive Officer. This condition shall not apply to leakless valves.

The operator shall revert from quarterly to monthly inspection program if less than 98.0 percent of the new valves and the new flange population inspected are found to leak gaseous or liquid volatile organic compounds at a rate less than 500 ppmv. This condition shall not apply to leakless valves.

The operator shall keep records of the monthly inspection (quarterly where applicable), subsequent repair, and reinspection, in a manner approved by the District.

The operator shall provide to the District, prior to initial startup, a list of all non-leakless type valves that were installed. The list shall include the tag numbers for the valves and reasons why leakless valves were not used. The operator shall not startup the equipment prior to the Districts approval for the use of all non-leakless valves

The operator shall provide to the District, no later than 90 days after initial startup, a recalculation of the fugitive emissions based on actual components installed and removed from service. The operator shall also submit a complete, as built, piping and instrumentation diagram(s) and copies of requisition data sheets or field inspection surveys for all non-leakless type valves with a listing of tag numbers and reasons why leakless valves were not used.

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

[Systems subject to this condition: Process 12, System 28; Process 13, System 11; **Process 16, System 10**; Process 17, System 7; Process 20, System 37]

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DEVICE CONDITIONS

B22.8 The operator shall not use this equipment with materials having a(n) true vapor pressure of 11 psia or greater under actual operating conditions.

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

[Devices subject to this condition: D1352, **D1358**, **D1359**, D1382, D1386, D1387, D1388, D1429, D1460, D2177, D4119, D4121, D4123, D4125, D4127]

~~**B22.21** The operator shall not use this equipment with materials having a(n) true vapor pressure of 9.5 psia or greater under actual operating conditions.~~

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

~~[Devices subject to this condition: **D1358**]~~

[**Note:** This condition will be replaced by condition B22.8.]

C1.104 The operator shall limit the throughput to no more than ~~1,146,680~~ 1,250,000 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 in feet per month.

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

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

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

~~While the ATLG is being repaired or when there is failure or shutdown of the ATLG or its routine maintenance, the throughput shall be determined by the hourly tank level data averaged from the previous 30 days prior to the discovery of the discrepancy, failure or occurrence of shutdown or routine maintenance.~~

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

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

[Devices subject to this condition: **D1359**]

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[**Note:** Some of the language in this permit condition is being modified for consistency with more recent conditions of this type.]

C1.118 The operator shall limit the throughput to no more than 875,000 barrels 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 in feet per month.

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

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

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

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

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

[Devices subject to this condition: [D1358](#)]

D90.36 The operator shall determine the true vapor pressure by one of the following methods: 1) sample and test the materials stored, 2) derive the vapor pressure using engineering calculations, or 3) maintain on file a copy of the Material Safety Data Sheet (MSDS) of the material stored.

Records of material stored, and their MSDS if applicable, shall be retained for a period of five years and made available to the Executive Officer upon request.

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

[Devices subject to this condition: D1270, D1277, D1278, D1279, D1280, D1285, D1286, D1287, D1288, D1290, D1292, D1293, D1300, D1301, D1303, D1329, D1335, D1352, [D1358](#), [D1359](#), D1371, D1373, D1417, D1420, D1429, D1439, D1452, D1453, D1455, D1464, [D1608](#), D1609, D1610, D1611, D1612, D1613, D1614, D1615, D1616, D1617, D1686, D2177, D2183, D3944, D4119, D4121, D4123, D4125, D4127, D4129, D4131, D4133, D4135, D4137, D4139, D4141, D4143, D4145, D4147, D4149, D4151, D4153,

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D4155, D4157, D4159, D4161, D4163, D4165, D4167, D4169, D4171, D4173, D4175, D4177, D4179, D4181, D4183, D4185, D4187, D4189, D4191, D4193, D4195, D4197]

[**Note:** This condition was erroneously left off the permit for Tank 183 (D1359)].

E71.9 The operator shall only use this equipment for the storage of any of the following commodities: Alkylate, FCC Light Gasoline, Hydrobate, Isomax Light Gasoline, Isomerate, Reformate and Motor Gasoline.

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

[Devices subject to this condition: **D1358, D1359**]

~~**E71.42** The operator shall not use this equipment for the storage of organic liquids/commodities having true vapor pressure of 9.0 psia or greater than 10.99 psia under actual storage conditions.~~

~~[**RULE 1178, 4-7-2006**]~~

~~[Devices subject to this condition: **D1359**]~~

[**Note:** This condition will be replaced by condition B22.8. Rule 1303(b)(2)-Offset is a more appropriate rule tag than Rule 1178.]

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

Contaminant	Rule	Rule/Subpart
VOC	40CFR60, Subpart	K

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

[Devices subject to this condition: D1282, D1283, D1313, **D1358**, D1361, D1375, D1377, D1386, D1387, D1388, D1389, D1411, D1416, D1417, D1418, D1420, D1449, D1467, D2164]

K67.32 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Tank throughput in barrels

Commodity/product stored and time period of its storage.

Actual 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(d), 1149, 1178, and 40CFR63, Subpart CC.

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

[Devices subject to this condition: **D1358**, D1423, D1468, D1474]

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K67.58 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Tank throughput in barrels per calendar month.

Commodity/product stored and time period of its storage.

Actual vapor pressure, in psia, of each commodity/product stored.

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(d), 1149, 1178, and 40CFR63, Subpart CC.

[RULE 1149, 5-2-2008; **RULE 1178, 4-7-2006; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 463, 5-6-2005; 40CFR 63 Subpart CC, 6-23-2003**]

[Devices subject to this condition: **D1359**, D1391, D1397, D1425, D1438, D1439]

K67.62 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Tank throughput in barrels per calendar month.

Commodity/product stored and time period of its storage.

Actual vapor pressure, in psia, of each commodity/product stored.

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(d), 1149, 1178, and 40CFR63, Subpart CC.

[**RULE 1303(b)(2)-Offset, 5-10-1996, RULE 1149, 5-2-2008; RULE 1178, 4-7-2006; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 463, 5-6-2005; 40CFR 63 Subpart CC, 6-23-2003**]

[Devices subject to this condition: **D1358, D1359**]

[**Note:** Consolidation of conditions K67.58 and 67.62.]

FEE ANALYSIS

Summary of Fee Analysis

A/N	Equipment Description (Based on BCAT/CCAT)	BCAT/ CCAT	Fee Schedule	Fee Type	Fiscal Year (1)	Fee
542538	Storage Tank w/Ext Float Roof – Gasoline	248904 (BCAT)	C	Modification	12-13	\$ 3,440.06
				POnoPC (2)	12-13	\$ 1,720.03
542539	Storage Tank w/Ext Float Roof – Gasoline	248904 (BCAT)	C	Modification	12-13	\$ 3,440.06
				POnoPC (2)	12-13	\$ 1,720.03
542540	RECLAIM/Title V Permit	555009 (BCAT)	na.	RECLAIM/Title V Permit Revision	12-13	\$ 1,789.12



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A/N	Equipment Description (Based on BCAT/CCAT)	BCAT/ CCAT	Fee Schedule	Fee Type	Fiscal Year (1)	Fee
				Total Fees		\$ 12,109.30
				Fees Paid (2)		\$ 15,549.36
				Outstanding Balance		\$ -3,440.60

- (1) Based on the date that the application was submitted.
- (2) Per Rule 301(c)(1)(D)(i), 50% additional fee is required for modification of a permit unit without first obtaining an permit to construct.
- (3) Chevron paid 50% additional fee for expedited processing of the tank applications. No overtime was spent on the applications so the additional fee of \$3,440.60 will be refunded.

PERMIT HISTORY

A history of previous permits for each of the subject storage tanks is contained in the tables below.

Permit History for Tank 182 (D1358)

Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
C04300	4/19/76			Original construction. EPA issued a New Source Review (NSR) Approval to Construct on Oct. 6, 1976.
C14773	11/16/77	M14370	8/22/80	Installed a secondary seal and replacement of 2 mixers.
173695	12/5/88	D37462	4/10/91	Replaced primary and secondary seals. Maximum emissions based on 33 turnovers per year and 11 psia. No ERCs since seals were installed to comply with Rule 463 requirements. Permit conditions of 11 psia and 33 TOs placed on tank.
375316	na.	F34511	10/20/00	Increased throughput limit from 33 TOs (369,368 bbls/month) to 532,420 bbls/month and decreased the true vapor pressure limit from 11psia down to 9 psia. Also added a limit on the type of commodities that can be stored.
399001	na.	F54665	8/30/02	Admin application: Removed reference to daily recordkeeping (condition C1.44) for the monthly throughput limit.
437663	7/01/05	G8851	7/6/10	Installed a Geodesic Dome Cover for compliance with Rule 1178 and increased vapor pressure limit to 9.5 psia and throughput limit to 875,000 bbl/month.
542538	na.	na.	na.	Modified roof fittings/openings without a PC and request to update roof fittings/openings and increase TVP limit from 9.5 psia to 10.99 psia.



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Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
A22638		P5305	10/7/64	Original construction.
C16218		M13101	5/22/80	Installed a secondary seal for compliance with Rule 463. Floating roof listed as pontoon type.
C16218	na.	R-M13101	4/23/81	Permit reissued with roof type changes to double deck.
141046	3/27/86	D04923	1/13/89	Replaced primary and secondary seals for compliance with revised Rule 463.
211700	na.	D11230	10/26/89	Increased throughput limit from 25 TOs per year to 50 TOs per year (7,680,900 bbl/yr).
375315	na.	F35084	11/15/00	Increased throughput limit to 914,700 bbl/month and reduced TVP limit from 11 psia to 9 psia. Also added a limit on the type of commodities that can be stored.
393349	na.	F56478	11/21/02	Admin application. Changed daily recordkeeping requirement to monthly and reinstated some conditions that were inadvertently dropped from the permit.
425157	3/16/04	na.	na.	Installed of a Geodesic Dome Cover for compliance with Rule 1178. Replacement of the unslotted guidepole with a slotted guidepole. Correction of the roof type from double deck to pontoon. Increased throughput limit from 914,700 to 1,146,680 bbl/month.
437665	na.	F85972	11/30/06	Chevron requested removal of the commodity, TVP and throughput limits since the tank "had never been Subject to NSR and removal of H23.24, which denoted that the tank was subject to NSPS Subpart Kb. Removal of the commodity, TVP and T'put limits was denied. Condition H23.24 was removed.
542539	na.	na.	na.	Modified roof fittings/openings without a PC and increase TVP limit from 9 psia to 10.99 psia and throughput limit from 1,146,680 bbl/month to 1,250,000 bbl/month

COMPLIANCE RECORD REVIEW

There are no ongoing violations for any of the equipment covered in this evaluation.

PROCESS DESCRIPTION:

A description of each of the subject domed external floating roof tanks is contained in the equipment description above. The proposed permit will limit the tanks to storage of the following commodities:

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- Tank No. 182 - Alkylate, FCC Light Gasoline, Hydrobate, Isomax Light Gasoline, Isomerate, Reformate and Motor Gasoline with maximum true vapor pressure (TVP) of 10.99 psia and maximum throughput of 875,000 barrels in any one calendar month.
- Tank No. 183 – Alkylate, FCC Light Gasoline, Hydrobate, Isomax Light Gasoline, Isomerate, Reformate and Motor Gasoline with maximum TVP of 10.99 psia and maximum throughput of 1,250,000 barrels in any one calendar month.

CALCULATION

Criteria Air Pollutant And Toxic Air Contaminant (TAC) emission estimates are contained in this section.

Criteria Air Pollutants

The only criteria air pollutant emitted by the subject tanks is VOC. Both storage tanks have previously been subject to NSR so the net VOC emission change is calculated according to Rule 1306(d)(2) as the post-modification maximum potential to emit (PTE) calculated pursuant to 1306(b) minus the pre-modification maximum PTE. The post-modification maximum potential VOC emission for each tank is based on the current roof configuration and the proposed throughput and vapor pressure limits. The pre-modification maximum potential VOC emission for each tank is based on the roof configuration prior to the subject modifications and the current throughput and vapor pressure limits.

EPA Tanks 4.0.9d is utilized for all calculations. Reformate will also be utilized for all calculations since it is the permitted commodity with the highest VOC and toxic air contaminant (TAC) emissions potential. During review of the application folder for PO A/N 437663 for Tank 182, it was identified that internal shell condition for Tank 182 was entered as “dense rust” in the EPA Tanks 4.0.9d. Chevron’s tank maintenance engineer confirmed that shell condition is “light rust”. The internal shell condition will be entered as “light rust” in all calculations for Tank 182.

The pre- and post-modification maximum potential VOC emissions for each tank and the resulting change in VOC emissions are shown in the table below.

Change in Maximum Potential VOC Emissions Due to Storage Tank Roof Modifications and Increase in Throughput and Vapor Pressure Limits

Tank No	Pre-Modification (1)				Post-Modification (2)				VOC Emission Change
	T'put	TVP	Estimated Emissions		T'put	TVP	Estimated Emissions		
	bbl/year	psia	lb/yr	lb/day (3)	bbl/year	psia	lb/yr	lb/day (3)	lb/day (3)
182	10,500,000	9.5	3956	10.99 (4)	10,500,000	10.99	4173	11.59	+ 0.60
183	13,760,160	9.0	3294	9.15	15,000,000	10.99	4390	12.19	+ 3.04

(1) Pre-modification maximum PTE is based on roof configuration prior to modifications and current throughput and vapor pressure limits.

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- (2) Post-modification maximum PTE is based on current roof configuration and proposed throughput and vapor pressure limits.
- (3) 30-day average = Annual emissions / 360
- (4) NSR baseline will be revised to 11 lb/day based on use of an internal shell condition of “light rust” in EPA Tanks 4.0.9d instead of “heavy rust” as utilized for max. PTE calculation under previous A/N 437663.

Toxic Air Contaminants

The pontoon roof modifications caused a reduction in both VOC and TAC emissions. For the Rule 1401 evaluation, the TAC emission reductions due to the roof modifications are not included in the estimated change in TAC emissions since these modifications have already occurred separately from the requested change in throughput and vapor pressure limits. Reformate is used in both the pre and post-modification TAC emission estimates since it is the commodity with the highest TAC content and health risk potential. The TAC content of reformate, which is show in the table below, is not expected to change.

Toxic Air Contaminant	Mass Percent in Reformate
Benzene	1.79
Ethylbenzene	4.17
Hexane (-n)	0.97
Napthalene	0.18
Toluene	18.7
Xylene	23.3

The maximum potential TAC emissions for each tank with the current and proposed throughput and vapor pressure limits are shown in the tables below.

Tank 182: Increase in Max. Potential TAC Emissions due to Change in T’put & VP Limits

Toxic Air Contaminant	Estimated Maximum Potential TAC Emissions (lb/yr)		TAC Emission Increase	
	Current Throughput and VP Limits	Proposed Throughput and VP Limits	lb/yr	lb/hr
Benzene	24.66	26.21	1.55	1.8E-04
Ethylbenzene	32.03	32.39	0.36	4.1E-05
Hexane (-n)	17.36	18.71	1.35	1.5E-04
Napthalene	1.26	1.22	0.04	4.6E-06
Toluene	168.1	172.8	4.7	5.4E-04
Xylene	173.5	174.8	1.3	1.5E-04

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Tank 183: Increase in Max. Potential TAC Emissions due to Change in T'put & VP Limits

Toxic Air Contaminant	Estimated Maximum Potential TAC Emissions (lb/yr)		TAC Emission Increase	
	Current Throughput and VP Limits	Proposed Throughput and VP Limits	lb/yr	lb/hr
Benzene	26.98	30.31	3.33	3.8E-04
Ethylbenzene	38.43	42.11	3.68	4.2E-04
Hexane (-n)	18.47	20.91	2.44	2.8E-04
Napthalene	1.54	1.68	0.14	1.6E-05
Toluene	195.8	216.3	20.5	2.3E-03
Xylene	209.4	229.1	19.7	2.2E-03

For Rule 1401, a Tier 1 Health Risk Screening is performed for each tank. Each of the tanks is more than 250 meters from the nearest receptor so 100 meter screening levels are utilized. The results are shown in the tables below.

Tank 182: Results of Tier I Screening Analysis (100 meters)

Toxic Air Contaminant	Cancer/Chronic			Acute		
	Emission Rate (lb/yr)	Screening Level (lb/yr)	Chronic Hazard Index	Emission Rate (lb/hr)	Screening Level (lb/hr)	Acute Hazard Index
Benzene	1.55	8.92	1.7E-01	1.8E-04	3.96	4.5E-05
Ethylbenzene	0.36	517,000	7.0E-07	4.1E-05	none	na.
Hexane	1.35	1,810,000	7.5E-07	1.5E-04	none	na.
Napthalene	0.04	7.74	5.2E-03	4.6E-06	none	na.
Toluene	4.7	77,500	6.1E-05	5.4E-04	99.1	5.4E-06
Xylene	1.3	181,000	7.2E-06	1.5E-04	58.9	2.5E-06
Total			1.8E-01			5.3E-05

Tank 183: Results of Tier I Screening Analysis (100 meters)

Toxic Air Contaminant	Cancer/Chronic			Acute		
	Emission Rate (lb/yr)	Screening Level (lb/yr)	Chronic Hazard Index	Emission Rate (lb/hr)	Screening Level (lb/hr)	Acute Hazard Index
Benzene	3.33	8.92	3.7E-01	3.8E-04	3.96	9.6E-05
Ethylbenzene	3.68	517,000	7.1E-06	4.2E-04	none	na.



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Toxic Air Contaminant	Cancer/Chronic			Acute		
	Emission Rate (lb/yr)	Screening Level (lb/yr)	Chronic Hazard Index	Emission Rate (lb/hr)	Screening Level (lb/hr)	Acute Hazard Index
Hexane	2.44	1,810,000	1.3E-06	2.8E-04	none	na.
Naphthalene	0.14	7.74	1.8E-02	1.6E-05	none	na.
Toluene	20.5	77,500	2.6E-04	2.3E-03	99.1	2.3E-05
Xylene	19.7	181,000	1.1E-04	2.2E-03	58.9	3.7E-05
Total			3.9E-01			1.6E-04

RULE EVALUATION

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., requires that the environmental impacts of proposed “projects” be evaluated and that feasible methods to reduce, avoid or eliminate significant adverse impacts of these projects be identified and implemented. According to the District’s CEQA Guidelines, the net emission increase thresholds for significant effect are:

ROG (VOC): 55 lb/day
 PM10: 150 lb/day
 CO: 274 lb/day

CEQA analysis is not required since the increase in VOC emissions is less than the significance threshold and there are no other significant environmental impacts. On the 400-CEQA forms, Chevron marked “No” to all of the additional criterion that may trigger CEQA. For these reasons, CEQA does not apply.

Regulation II: Permits

Rule 212: Standards for Approving Permits

212(c)(1): Public notice is required for a project if any of the modified permit units are located within 1000 feet of a school. Public notice is not required under this clause since neither of the subject storage tanks are located within 1000 feet of a school.

212(c)(2): Public notice is required for any “new or modified facility”, which has on-site emission increases exceeding any of the daily maximums specified in subdivision (g) of Rule 212. The 212(g) emission thresholds are shown in the table below. Public notice is not required under this clause since the combined increase in VOC emissions for the subject tanks is less than the Rule 212(g) threshold of 30 lb/day.



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Air Contaminant	R212(g) Daily Maximum Threshold (lb/day)	Emission Increase for Tanks 194 and 998 (lb/day)
CO	220	0
NOx	40	0
PM10	30	0
SOx	60	0
VOC	30	1.98
Lead	3	0

1) Increase in 30-day average maximum potential to emit.

212(c)(3): Public notice is required for any new or modified permit units that have an increase in toxic air contaminants that results in an increase of maximum individual cancer risk (MICR) of more than one in a million (1×10^{-6}) during a lifetime (70 years). As discussed in additional detail in the evaluation of Rule 1401, replacement of the roofs does not cause an increase in MICR of more than 1×10^{-6} . Public notice is not required under this clause.

212(g): 212(g) specifies that any new or modified sources subject to Regulation XIII which undergo construction or modifications resulting in an emissions increase exceeding any of the daily maximum emission thresholds (listed in the table above) will require notification. From Regulation XIII (Rule 1302), the definition of “Source” is any permitted individual unit, piece of equipment, article, machine, process, contrivance, or combination thereof, which may emit or control an air contaminant. This includes any permit unit at any non-RECLAIM facility and any device at a RECLAIM facility.

Public notice is not required under this clause since the increase in VOC emissions for each tank is less than the Rule 212(g) threshold of 30 lb/day.

Regulation IV: Prohibitions

Rule 401: Visible Emissions

This rule specifies that a person shall not discharge emissions from a source for a period or periods aggregating more than three minutes in any one hour which are as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or emissions of such opacity that it obscures an observers view to an equal or greater level. This is equivalent to opacity of 20%.

Operation of the subject tanks is not expected to cause any visible emissions. Compliance with this rule is expected.

Rule 402: Nuisance

This rule requires that a person not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which cause, or have a natural tendency to cause injury or damage to business or property.

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These tanks do not have a history of causing nuisance. Increase of the throughput and vapor pressure limits is not expected to significantly impact nuisance potential. Compliance is expected.

Rule 463: Storage of Organic Liquids

This rule applies to any above-ground stationary tank with a capacity of 75,000 liters (19,815 gallons) or greater used for storage of organic liquids, and any above-ground tank with a capacity between 950 liters (251 gallons) and 75,000 liters (19,815 gallons) used for storage of gasoline. Domed External Floating Roof Tanks are subject only to the general requirements in Rule 463(d).

463(d)(1) requires a pressure-vacuum valve to be set within 10 percent of the maximum working pressure of the tank, for storage tanks between 251 and 19,815 gallons. This requirement does not apply to the subject tanks since their capacity is greater than 19,815 gallons.

463(d)(2) requires the roof to float on the stored organic liquid at all time, except when emptied for cleaning or repair. The applicant is expected to comply with this requirement.

463(d)(3) requires that a tank that has been gas-freed and is to be refilled with gasoline, the roof shall be refloated with water or by an equivalent procedure approved by the Executive Officer. The applicant is expected to comply with this requirement.

463(d)(4) limits the maximum vapor pressure to no more than 11 psia. The permit for each of the tanks will include condition B22.8, which limits the tanks to the storage of commodities with vapor pressure less than 11 psia at actual storage conditions. Compliance with this requirement is expected.

463(d)(5) requires replacement seals to be chosen from a list approved by the Executive Officer. The applicant is expected to comply with this requirement.

Regulation IX: Standards of Performance for New Stationary Sources (NSPS)

40CFR60: Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978

Applicable facilities under this subpart are storage vessels with a capacity greater than 40,000 gallons that are used to store petroleum liquids for which construction, reconstruction, or modification is commenced after June 11, 1973, and prior to May 19, 1978.

Tank 182 is subject to the requirements of this regulation since it was constructed in 1976. The permit for the tank includes condition H23.10, which denotes that the tank is subject to the applicable requirements of this regulation. Tank 183 is not subject to this regulation since it was not constructed, reconstructed or modified during the applicable period.

Per §60.112(a)(1), storage tanks that store petroleum liquids with a vapor pressure of 1.5 psia to 11.1 psia shall be equipped with a floating roof, a vapor recovery system, or their equivalents. The tank has a floating roof. The only other applicable requirements in this regulation are the

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monitoring and recordkeeping requirements of §60.113. As discussed below, this tank is subject to 40CFR63 Subpart CC as a Group 1 storage tank. It is specified in §63.640(n)(5) that a Group 1 storage tank that is also subject to 40CFR60 Subparts K or Ka is only required to comply with the provisions of 40CFR63 Subpart CC. Therefore, the tank is not required to comply with the monitoring and recordkeeping requirements of this regulation.

40CFR60: Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984

Applicable facilities under this subpart are storage vessels with a capacity greater than 40,000 gallons that are used to store petroleum liquids for which construction, reconstruction, or modification is commenced after May 18, 1978 and prior to July 23, 1984.

These tanks are not subject to this regulation since they were not constructed, reconstructed or modified during the applicable period.

40CFR60: Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

Applicable facilities under this subpart are storage vessels with a capacity greater than 10,568 gallons that are used to store volatile organic liquids (VOL's) for which construction, reconstruction, or modification is commenced after July 23, 1984.

These tanks are not subject to this regulation since they have not been modified or reconstructed after July 23, 1984. The physical modifications of the roofs are not considered to be modifications since they caused a decrease in estimated VOC emissions.

The proposed vapor pressure and throughput increases are not considered to be modifications of the tanks. The definition for modification at 40CFR60.14(a) follows: "Except as provided under paragraphs (e) and (f) of this section, any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies". The following exceptions are provided:

40CFR60.14(e) - The following shall not, by themselves, be considered modifications under this part: (2) An increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure on that facility. (4) Use of an alternative fuel or raw material if, prior to the date any standard under this part becomes applicable to that source type, as provided by §60.1, the existing facility was designed to accommodate that alternative use. A facility shall be considered to be designed to accommodate an alternative fuel or raw material if that use could be accomplished under the facility's construction specifications as amended prior to the change.

The proposed increase in throughput for Tank 183 will not subject the tank to the requirements of this NSPS since the tank can accommodate the increase without a capital expenditure. The roof modifications that are covered in this evaluation were made in the past and are unrelated to the proposed increase in throughput and were not necessary to accommodate the increase in throughput.

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The proposed storage of higher vapor pressure commodities in Tanks 182 and 183 will not subject the tanks to the requirements of this NSPS since the tanks were designed to accommodate the higher vapor pressure commodities prior to the date that his NSPS became effective. The roof modifications that are covered in this evaluation were made in the past are unrelated to the storage of higher vapor pressure commodities and were not necessary to accommodate the storage of the higher vapor pressure commodities.

Regulation X: National Emission Standards for Hazardous Air Pollutants (NESHAPS)

40CFR63: Subpart CC: National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries

This Subpart applies to petroleum refining sources and related emission sources that are specified in section 63.640 (c) (5) through (c) (7) [e.g. miscellaneous process vents (except for FCCU, SRU, and CRU vents), storage vessels, wastewater stream, equipment leaks, gasoline loading racks, marine vessel loading, etc.] that are located in a major source and emit or have equipment contacting one or more of the hazardous air pollutants (HAPs) listed in Table 1 of this subpart. This subpart took effect on August 18, 1998 and was last amended on October 28, 2009.

The definition of a Group 2 storage Vessel is any “storage vessel that does not meet the definition of a Group 1 storage vessel.” A Group 1 storage vessel is defined as a “storage vessel at an existing source that has a design capacity greater than or equal to 177 cubic meters (46728 gallons) and stored-liquid maximum vapor pressure greater than or equal to 10.4 kilopascals (1.5 psia) and stored-liquid annual average TVP greater than or equal to 8.3 kilopascals (1.2 psia) and annual average HAP liquid concentration greater than 4 percent by weight total organic HAP.”

Both storage tanks are Group 1 storage tanks. The storage tank provisions of this NESHAP are specified at §63.646. This section of the regulation also references 40CFR 63.119 through 63.121 [MACT Subpart G for the Synthetic Organic Chemical Manufacturing Industry] for many of the storage tank requirements. According to §63.646(c), paragraphs §63.119(b)(5), (b)(6), (c)(2), and (d)(2) do not apply to storage vessels at existing sources subject to this subpart. These paragraphs do not apply to Tanks 182 and 183 since the Chevron refinery is an existing source under this subpart.

The roof related requirements are specified at §63.119(c)(1) and §63.646(f). The tanks comply with all of these requirements, which are summarized below.

§63.119(c)(1) - Each external floating roof shall be equipped with primary and secondary seals with the primary seal being either a metallic shoe seal or a liquid mounted seal.

§63.646(f) – This section specifies the following requirements:

- (1) If a cover or lid is installed on an opening on a floating roof, the cover or lid shall remain closed except when the cover or lid must be open for access.
- (2) Rim space vents are to be set to open only when the floating roof is not floating or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting.
- (3) Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

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Regulation XI: Source Specific Standards

Rule 1149: Storage Tank Degassing (May 2, 2008)

1149(c)(1) contains the requirement that VOC emissions be controlled during cleaning /degassing activities for all tanks that meet the specified volume / vapor pressure thresholds. The threshold levels are:

- Volume \geq 500 gallons and $<$ 26,420 gallons with Reid vapor pressure (RVP) $>$ 3.9 psi, or
- Volume \geq 26,420 gallons and $<$ 100,000 gallons with Reid vapor pressure (RVP) $>$ 2.6 psi, or
- Volume \geq 100,000 gallons with RVP $>$ 0.5 psi

These tanks are subject to the cleaning/degassing requirements of this rule. Modification of the TVP and throughput limits does not impact compliance with these requirements. Compliance is expected.

Rule 1178: Further Reductions of VOC emissions from Storage Tanks at Petroleum Facilities

This rule is applicable to this facility since it is a petroleum refinery with facility wide VOC emissions exceeding the 20 ton/year VOC threshold. This rule applies to all aboveground storage tanks that have capacity equal to or greater than 75,000 liters (19,815 gallons), are used to store organic liquids with a TVP greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions.

Both of these storage tanks are subject to the requirements of this regulation since they have a capacity greater than 19,815 gallons and store organic liquids with a TVP greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions.

1178(d)(1)(A): This clause specifies the roof opening/ fittings and roof seal requirements for external and domed external floating roof tanks. As shown in the tables below, both tanks comply with these requirements.

Tank 182: Summary of Roof Opening / Fitting Controls and Seals

Roof Opening / Fitting or Seal Type	Required Roof Seal and Opening/Fitting Configuration		Applicable Rule 1178 Citation
	No	Type	
Access Hatch	2	Cover: bolted & gasketed	1178(d)(1)(A)(i)
Automatic Gauge Float Well	1	Cover: bolted & gasketed	1178(d)(1)(A)(i)
Gauge Hatch / Sample Well	2	Weighted mechanical actuation; Cover: gasketed.	1178(d)(1)(A)(ii)
Roof Leg, Adjustable, Center Area	36	Impervious Sock Cover	1178(d)(1)(A)(iii)
Roof Leg, Adjustable, Pontoon Area	24	Impervious Sock Cover	1178(d)(1)(A)(iii)
Rim Vent	0	Gasketed	1178(d)(1)(A)(iv)



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Roof Opening / Fitting or Seal Type	Required Roof Seal and Opening/Fitting Configuration		Applicable Rule 1178 Citation
	No	Type	
Vacuum Breaker	1	Weighted mechanical actuation; Gasketed	1178(d)(1)(A)(v)
Roof Drain	1	Slotted membrane fabric cover that covers at least 90 percent of the area of the opening.	1178(d)(1)(A)(vi)
Slotted Guidepole	1	Gasketed sliding cover with pole wiper and pole sleeve	1178(d)(1)(A)(ix) & 1178(d)(1)(A)(x)
Primary Seal	1	Mechanical Shoe or liquid mounted	1178(d)(1)(B)(i)
Secondary Seal	1	Rim mounted and shall not be attached to the primary seal.	1178(d)(1)(B)(ii)

Tank 183: Summary of Roof Opening / Fitting Controls and Seals

Roof Opening / Fitting or Seal Type	Required Roof Seal and Opening/Fitting Configuration		Applicable Rule 1178 Citation
	No	Type	
Access Hatch	3	Cover: bolted & gasketed	1178(d)(1)(A)(i)
Automatic Gauge Float Well	1	Cover: bolted & gasketed	1178(d)(1)(A)(i)
Gauge Hatch / Sample Well	2	Weighted mechanical actuation; Cover: gasketed.	1178(d)(1)(A)(ii)
Roof Leg, Adjustable, Center Area	13	Impervious Sock Cover	1178(d)(1)(A)(iii)
Roof Leg, Adjustable, Pontoon Area	16	Impervious Sock Cover	1178(d)(1)(A)(iii)
Rim Vent	0	Gasketed	1178(d)(1)(A)(iv)
Vacuum Breaker	2	Weighted mechanical actuation; Gasketed	1178(d)(1)(A)(v)
Roof Drain	3	Slotted membrane fabric cover that covers at least 90 percent of the area of the opening.	1178(d)(1)(A)(vi)
Slotted Guidepole (w/float)	1	Gasketed sliding cover, pole wiper, pole sleeve and pole float wiper.	1178(d)(1)(A)(ix) & 1178(d)(1)(A)(x)
Primary Seal	1	Mechanical Shoe or liquid mounted	1178(d)(1)(B)(i)
Secondary Seal	1	Rim mounted and shall not be attached to the primary seal.	1178(d)(1)(B)(ii)

It is specified in §1178(d)(2)(A) that a dome cover shall be installed on all external floating roof tanks that contain organic liquids having true vapor pressure (TVP) greater than or equal to 3

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psia as reported in the Annual Emissions Report pursuant to Rule 301 - Permit Fees for the emission inventory year 2000 (Phase I tanks). Both tanks have geodesic dome covers that comply with this requirement.

Compliance with the requirements of this regulation is expected.

Regulation XIII: New Source Review

As specified in Rule 1301, Regulation XIII, sets forth pre-construction review requirements for new, modified, or relocated facilities, to ensure that the operation of such facilities does not interfere with progress in attainment of the national ambient air quality standards (NAAQS), and that future economic growth within the South Coast Air Quality Management District (District) is not unnecessarily restricted. The specific air quality goal of this regulation is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors.

The South Coast Air Basin (SOCAB) is designated in attainment of the NAAQSs for CO, NOx and SOx. The following are currently considered nonattainment air contaminants that are subject to new source review (NSR): NOx, SOx, PM_{2.5}, PM₁₀, and VOC. NOx and VOC are included since they are precursors for ozone. NOx, SOx and VOC are included as PM_{2.5} and PM₁₀ precursors.

NSR requirements for these nonattainment pollutants are specified in the following rules:

- Rule 1303 – PM10 and VOC (all facilities); NOx and SOx (non-RECLAIM facilities)
- Rule 1325 – PM2.5
- Rule 2005 – NOx and SOx (RECLAIM facilities)

Since Chevron is a RECLAIM facility, it is subject to the NSR requirements for NOx and SOx specified in Rule 2005 of the RECLAIM regulation (Regulation XX). Sources that emit ammonia, CO, and Ozone Depleting Compounds (ODCs) are subject to only the BACT requirements of Rule 1303 for these pollutants.

Rule 1303: Requirements

This rule requires the Executive Officer to deny a Permit to Construct for any new, modified or relocated source which results in an emission increase of CO, PM10, VOC, any ozone depleting compound, or ammonia, unless BACT is used. This rule also requires modeling for a net increase in PM10 and offset (among other requirements) for a net increase in PM10 or VOC emissions for any new or modified source.

The subject storage tanks do not emit ammonia, ODCs, CO, PM₁₀, NOx or SOx. Therefore, they are only subject to NSR requirements for VOC. As shown in the *Calculation Section*, Tank Nos. 182 and 183 will have an increase in estimated VOC emissions of 0.60 lb/day and 3.04 lb/day, respectively.

1303(a) - Best Available Control Technology (BACT): Any new or modified source which results in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia, must employ BACT for the new or relocated source or for the actual

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modification to an existing source. Per District policy, BACT is required for any increase in emissions that exceeds 1.0 lb per day on a maximum daily basis.

Both tanks are subject to BACT for VOC since each will have a VOC emission increase of more than 1.0 lb per day. BACT for external floating roof storage tanks is a dome cover and Category A primary and secondary seals. Both tanks are currently equipped with BACT.

1303(b) – The following requirements apply to any new or modified source which results in a net emission increase of any nonattainment air contaminant. Tank Nos. 194 and 998 are subject to these requirements since the roof replacement for each causes a net increase in VOC emissions.

1303(b)(1): Modeling - The applicant must substantiate with modeling that the new facility or modification will not cause a violation, or make significantly worse an existing violation of any state or national ambient air quality standards at any receptor location in the District. According to 1306(b), the new total emissions for modified sources shall be calculated on a pound per day basis for determination of BACT and modeling applicability. The modeling procedures are discussed in Appendix A to the rule. It is specified in Appendix A that modeling is not required for VOC or SOx.

Modeling is not required for the subject storage tank since it emits only VOC.

1303(b)(2): Offsets – Unless exempt from offsets requirements pursuant to Rule 1304, emission increases shall be offset by either Emission Reduction Credits approved pursuant to Rule 1309, or by allocations from the Priority Reserve. Per District policy, Offsets are required for any increase in emissions that is equal to or greater than 0.42 lb per day on a 30-day average basis. It is also District policy that offsets are calculated on a project basis. These throughput and vapor pressure limit changes are not part of a project so the offsets for each application will be calculated separately. Since the refinery is located in the South Coast Air Basin (SOCAB), an offset ratio of 1.2-to-1.0 is required.

The VOC emission offset requirements are shown in the table below.

Tank No.	Max. Potential VOC Emission Increase (lb/day)(1)	VOC Emission Increase with Offset Ratio (lb/day) (2)	VOC ERCs Required (lb/day)(2)
182	0.60	0.72	1
183	3.04	3.65	4

(1) 30-day average

(2) Max. potential VOC emission increase times 1.2

(3) Rounded to nearest whole number.

1303(b)(3) - Sensitive Zone Requirements: This section pertains to Emission Reduction Credits (ERCs) for facilities in the South Coast Air Basin (SOCAB). Except for credits that are obtained from the Priority Reserve, facilities are subject to the Sensitive Zone requirements (H&SC Section 40410.5) for ERCs. A facility in zone 1 may obtain ERCs originated in zone 1 only, and a facility in zone 2A may obtain ERCs from either zone 1 or zone 2A.

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The El Segundo Refinery is located in Zone 1. Chevron will utilize ERC certificate no. AQ011196 or an ERC derived from AQ011196 to offset the VOC increases. These ERCs were originally generated under ERC certificate number AQ001497 in 1995 for shutdown of two degreasers at an ALCOA facility (ID 017418) located in Vernon, which is in Zone 1.

1303(b)(4) - Facility Compliance: The facility must be in compliance with all applicable rules and regulations of the District. The District's compliance database was reviewed to determine current facility compliance status. There are no open Notices of Violation (NOVs) or Notices to Comply (NCs) listed in the database for the Chevron Refinery (ID 800030).

1303(b)(5) - Major Polluting Facilities: Any new major polluting facility (source) or major modification at an existing major polluting facility (source) must comply with the requirements of this section. A major modification is defined in 1302(r) as any modification at an existing major source that will cause

- an increase of one pound per day or more, of the facility's potential to emit (PTE) for NO_x or VOC if the facility is located in the SOCAB, or
- an increase of 40 tons per year or more, of the facility's PTE for SO_x, or
- an increase of 15 tons per year or more, of the facility's PTE for PM₁₀; or,
- an increase of 50 tons per year or more, of the facility's PTE for CO.

The requirements of this section are applicable to both of the tanks since they will each have a VOC emission increase greater than 1 lb/day.

(A) *Alternative Analysis* – Applicant must conduct an analysis of alternative sites, sizes, production processes, and environmental control techniques for such proposed source and demonstrate that the benefits of the proposed project outweigh the environmental and social costs associated with that project.

As specified at 1303(b)(5)(D)(i), the requirements for an alternative analysis under this subparagraph may be met through compliance with the California Environmental Quality Act if the proposed project is exempt from California Environmental Quality Act analysis pursuant to a statutory or categorical exemption pursuant to Title 14, California Code of Regulations Sections 15260 to 15329.

As discussed earlier, these applications are not subject to any requirements under CEQA since the VOC emission increase for the tanks is less than the 55 lb/day CEQA threshold and there are no other significant environmental impacts.. No additional analysis is required under this clause.

(B) *Statewide Compliance:* The applicant must demonstrate that all major stationary sources, as defined in the jurisdiction where the facilities are located, that are owned or operated by the applicant in the State of California are subject to emission limitations and are in compliance or on a schedule for compliance with all applicable emission limitations and standards under the Clean Air Act.

An October 2, 2012 letter from Ms. Susan Worley, the Health, Environmental, and Safety Manager at the El Segundo Refinery, indicating that all major sources owned or operated by Chevron U.S.A. Inc. in California are in compliance or are on a schedule for

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compliance with all applicable standards emission limitations and standards under the Clean Air Act is contained in engineering file.

(C) *Protection of Visibility* - A modeling analysis for plume visibility is required if the net emission increase exceeds 15 tons/yr of PM10 or 40 tons/yr of NOx. These tanks do not emit PM10 or NOx.

(D) *Compliance through California Environmental Quality Act* – As discussed previously, CEQA requirements have been fulfilled. (See CEQA Evaluation).

Rule 1325: Federal PM2.5 New Source Review Program

This NSR rule, which addresses the emission of PM2.5 and its precursors NOx and SO2, was adopted by the District’s Governing Board on June 3, 2011. The subject storage tanks are not subject to any requirements under this regulation since they do not emit PM2.5.

Regulation XIV: Toxic Air Contaminants

Rule 1401 New Source Review of Toxic Air Contaminants

Requirements – Rule 1401 contains the following requirements:

- 1) (d)(1) *MICR and Cancer Burden* - The cumulative increase in MICR which is the sum of the calculated MICR values for all toxic air contaminants emitted from the new, relocated or modified permit unit will not result in any of the following:
 - (A) an increased MICR greater than one in one million (1.0×10^{-6}) at any receptor location, if the permit unit is constructed without T-BACT;
 - (B) an increased MICR greater than ten in one million (1.0×10^{-5}) at any receptor location, if the permit unit is constructed with T-BACT;
 - (C) a cancer burden greater than 0.5.
- 2) (d)(2) *Chronic Hazard Index* - The cumulative increase in total chronic HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.
- 3) (d)(3) *Acute Hazard Index* - The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.

Analysis – The summary results of the Tier 1 Screening Analysis are shown in the table below. Since the Cancer/Chronic and Acute Screening Indexes for each tank are less than 1.0, compliance with this rule is achieved.

Summary Results of Tier I Screening Analysis

Tank No.	Chronic/Cancer Screening Index	Acute Screening Index
182	1.8E-01	5.3E-05
183	3.9E-01	1.6E-04

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Regulation XVII - Prevention of Significant Deterioration (PSD)

The PSD program is the federal New Source Review (NSR) program for pollutants for which an area is in attainment with or unclassified with respect to a National Ambient Air Quality Standard (NAAQS) and for Greenhouse Gases (GHGs).

Rule 1703 – PSD Analysis (& Associated Rules 1701, 1702, 1704, 1706, 1710 & 1713)

These rules contain the PSD requirements for attainment pollutants and selected unclassified pollutants. As discussed earlier, SOCAB is currently designated as attainment with NAAQSs for SO₂, NO₂, CO, and Lead. The subject tanks are not subject to any requirements under this regulation since they do not emit CO, NO₂, SO₂, or Lead.

Rule 1714 – Prevention of Significant Deterioration for Greenhouse Gases

This rule sets forth preconstruction review requirements for greenhouse gases (GHG), which is defined as an aggregate group of six GHGs: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride.

According to §52.21(b)(49)(i) – (v), the pollutant GHG is subject to requirements under this regulation if either of the following applies:

- A stationary source, which is an existing major stationary source for a regulated non-GHG NSR pollutant, undertakes a “major modification” that subjects the source to PSD permitting requirements for a non-GHG NSR pollutant and the modification will result in an emission increase and net emission increase of at least 75,000 tpy on a CO_{2e} basis and 0 tpy on a mass basis.
- A stationary source, which is an existing major stationary source that emits or has the potential to emit 100,000 tpy CO_{2e}, undertakes a modification that will result in an emission increase and net emission increase of at least 75,000 tpy on a CO_{2e} basis and 0 tpy on a mass basis.

None of the commodities in these tanks contain significant amounts of carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, per fluorocarbons, or sulfur hexafluoride. Therefore, the storage tanks will not emit significant amounts of GHGs.

Regulation XX: Regional Clean Air Incentive Market (RECLAIM)

The subject storage tanks are not subject to RECLAIM since they do not emit NO_x or SO_x.

Regulation XXX: Title V Permits

The initial Title V permit for the refinery was sent to Chevron on September 29, 2009 with an effective date of October 12, 2009. The permit issued for this tank will be issued as a revision of the Title V permit. Permit revisions are categorized into the following four types: *administrative, minor, de minimis significant and significant*. The review and distribution requirements for each revision type are summarized in the following table.

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Title V Permit Revisions: Review and Distribution Requirements

Revision Type	Permit Review and Distribution Requirements		
	EPA Review (45-day)	Public Notice (30-day)	Send Final Permit to EPA
Administrative	No	No	Yes
Minor	Yes	No	Yes
De Minimis Significant	Yes	No	Yes
Significant	Yes	Yes	Yes

As defined in Rule 3000, a minor Title V permit revision is any revision that:

- (1) does not require or change a case-by-case evaluation of: reasonably available control technology (RACT) pursuant to Title I of the federal Clean Air Act; or maximum achievable control technology (MACT) pursuant to 40 CFR Part 63, Subpart B;
- (2) does not violate a regulatory requirement;
- (3) does not require any significant change in monitoring terms or conditions in the permit;
- (4) does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit;
- (5) does not result in an emission increase of RECLAIM pollutants over the facility starting Allocation plus nontradeable Allocations, or higher Allocation amount which has previously undergone a significant permit revision process;
- (6) does not result in an increase in emissions of a pollutant subject to Regulation XIII - New Source Review or a hazardous air pollutant;
- (7) does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement;
- (8) is not an installation of a new permit unit subject to a New Source Performance Standard (NSPS) pursuant to 40 CFR Part 60, or a National Emission Standard for Hazardous Air Pollutants (NESHAP) pursuant to 40 CFR Part 61 or 40 CFR Part 63; and,
- (9) is not a modification or reconstruction of an existing permit unit, resulting in new or additional NSPS requirements pursuant to 40 CFR Part 60, or new or additional NESHAP requirements pursuant to 40 CFR Part 61 or 40 CFR Part 63; or,
- (10) incorporates an existing general permit, as defined in subdivision (e) of Rule 3004, and its associated requirements, into another Title V permit.

A de minimis significant Title V permit revision meets all of the requirements above with the exception that it does result in an increase in the emission of HAP, CO, VOC or PM10 that is not greater than the respective threshold below and the total cumulative emission increase of HAP, CO, VOC or PM10 for all de minimis Title V revisions during the term of the Title V permit is not greater than the respective threshold:

HAP: 30 lb/day
CO: 220 lb/day
VOC: 30 lb/day
PM10: 30 lb/day

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Once the cumulative emission increase of HAP, CO, VOC or PM10 for all de minimis revisions issued during the term of the Title V permit exceeds the respective threshold above, all subsequent Title V permit revisions, with an increase of HAP, CO, VOC or PM10, issued during the term of the Title V permit will be significant revisions. Therefore, the cumulative increase in HAP, CO, VOC and PM10 emissions for de minimis revisions must be tracked for each 5-year Title V permit term. The term of the current Title V permit is from October 12, 2009 until October 11, 2014.

The proposed revision meets all of the minor TV revision specifications listed above except that the proposed modifications cause a total increase in estimated VOC emissions of 3.64 lb/day (0.60 + 3.04). Therefore, it qualifies as a de minimis significant revision. The table below contains a summary of the HAP, CO, VOC and PM10 emission increases for all de minimis significant revisions issued during the term of the current Chevron El Segundo Refinery Title V Permit.

Since the cumulative emission increase of HAP, CO, VOC and PM10 for all de minimis significant revisions issued during the current term of the Chevron Title V permit is less than respective threshold, this revision of the Title V permit is a de minimis significant revision.

Emission Increases for De Minimis Significant Revisions of Chevron Title V Permit

Title V Revision Appl. No.	Title V Revision No.	Revision Date	Emission Increase (lb/day)			
			HAP	CO	VOC	PM10
511206	Revision No. 45 of Section D	9/15/10	0	0	1.0	0
516647	Revision No. 48 of Section D & Revision No. 103 of Section H	3/31/11	0	0	1.4	0
526610	Revision 105 of Section H	5/10/12	0	0	0.3	0
533787	Revision No. 54 of Section D	8/14/12	0	0	1.0	0
539644	To Be Determined	TBD	0	0	1.8	0
542540	To Be Determined	TBD	0	0	3.6	0
Cumulative (1)			0	0	9.1	0

(1) Cumulative emission increase for all de minimis significant Title V permit revisions since issuance of the initial Title V permit on October 12, 2009.

Chevron has submitted Title V permit revision A/N 542540 for processing of this de minimis significant Title V permit revision, which will be distributed for a 45-day EPA review.

RECOMMENDATION:

Based on the foregoing evaluation, it is expected that the subject applications will comply with all applicable District Rules and Regulations. It is recommended that a Permit to Operate, Section D of the RECLAIM/Title V facility permit, be issued for Storage Tank Nos. 182 and 183.