

**YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT**  
1947 Galileo Court, Suite 103; Davis, CA 95618  
(530) 757-3650

**TITLE V PERMIT RENEWAL STATEMENT OF BASIS**

PERMIT NUMBER: F-00012-6

ENGINEER: Gary Ma

DATE: January 8, 2008

**Facility Name:** BP West Coast Products, LLC  
**Mailing Address:** 1601 South River Road  
West Sacramento, CA 95691

**Location:** 1601 South River Road  
West Sacramento, CA 95691

**Responsible Official:** Michael Peterson  
**Title:** Sacramento Terminal Manager

**Application Contact:** Debra Portello  
**Title:** Health, Safety, Security, and Environmental Advisor  
**Phone:** (510) 231-4704

**I. FACILITY DESCRIPTION**

The BP West Coast Products, LLC - Sacramento Terminal (henceforth referred to as "BP" for the purposes of this document) is a petroleum bulk storage and loading terminal operation. The facility receives gasoline and diesel products by underground pipeline and ethanol products by truck and rail. These products are then stored in bulk storage tanks. The products are dispensed by way of two, two-lane truck loading racks connected to a vapor recovery system that utilizes a vapor bladder tank and a vapor combustion unit.

**II. INSIGNIFICANT EMISSION UNIT INFORMATION**

Insignificant emission units or exempted equipment may be supplemented, replaced, or modified with non-identical equipment without notice provided exemption status has not changed as defined in current Yolo-Solano Air Quality Management District (District) or Federal rules. The equipment listed in Table 1 is a

partial listing of equipment currently identified as exempt or insignificant and not required to obtain an operating permit pursuant to District Rule 3.2.

Table 1. Exempted And Insignificant Emission Units (partial listing)

Insignificant Equipment Description	Basis for Exemption
Pumpback Tank	District Rule 3.2, Section 113
Additive Truck Offloading	District Rule 3.2, Section 109
Portable Equipment	District Rule 3.2, Section 114
Additive/Red Dye Totes	District Rule 3.2, Section 113

### III. SIGNIFICANT EMISSION UNIT INFORMATION

Each emission unit has been constructed pursuant to issuance of an Authority to Construct (ATC) in accordance with District Rule 3.1 and District Rule 3.4.

**Identification Number:** P-43-01(a) [Tank #1]

**Equipment Description:** 2,814,000 gallon welded gasoline storage tank.

**Control Equipment:** Internal steel floating roof (welded) with a vapor-mounted resilient toroid (log) primary seal and rim-mounted secondary seal.

**Identification Number:** P-44-01(a) [Tank #3]

**Equipment Description:** 1,664,000 gallon welded gasoline storage tank.

**Control Equipment:** Internal steel floating roof (welded) with a mechanical shoe primary seal and rim-mounted secondary seal.

**Identification Number:** P-45-01(a) [Tank #4]

**Equipment Description:** 1,663,000 gallon welded gasoline storage tank.

**Control Equipment:** Internal steel floating roof (welded) with a mechanical shoe primary seal and rim-mounted secondary seal.

**Identification Number:** P-46-01(a) [Tank #7]

**Equipment Description:** 387,000 gallon welded diesel storage tank.

**Control Equipment:** Internal steel floating roof (welded) with a mechanical shoe primary seal and shoe-mounted secondary seal.

**Identification Number:** P-47-01(a) [Tank #8]

**Equipment Description:** 389,000 gallon welded diesel storage tank.

**Control Equipment:** Internal steel floating roof (welded) with a mechanical shoe primary seal and shoe-mounted secondary seal.

**Identification Number:** P-48-01(a) [Tank #9]

**Equipment Description:** 388,000 gallon welded diesel storage tank.

**Control Equipment:** Internal steel floating roof (welded) with a mechanical shoe primary seal and shoe-mounted secondary seal.

**Identification Number:** P-49-01(a1) [Tank #10]

**Equipment Description:** 387,000 gallon welded diesel storage tank.

**Control Equipment:** Internal steel floating roof (welded) with a mechanical shoe primary seal and rim-mounted secondary seal.

**Identification Number:** P-50-01(a1) [Tank #11]

**Equipment Description:** 390,000 gallon welded diesel storage tank.

**Control Equipment:** Internal steel floating roof (welded) with a mechanical shoe primary seal and rim-mounted secondary seal.

**Identification Number:** P-51-01(a) [Tank #12]

**Equipment Description:** 386,000 gallon welded diesel storage tank.

**Control Equipment:** Internal steel floating roof (welded) with a mechanical shoe primary seal and rim-mounted secondary seal.

**Identification Number:** P-54-93(a4) [Tank #15]

Equipment Description: 1,690,000 gallon welded gasoline storage tank and one (1) 75 HP gasoline product pump.

Control Equipment: Internal steel floating roof (welded) with a mechanical shoe primary seal and rim-mounted secondary seal.

**Identification Number: P-66-93(a1) [Tank #16]**

Equipment Description: 389,000 gallon welded gasoline storage tank.

Control Equipment: Internal steel floating roof (welded) with a mechanical shoe primary seal and rim-mounted secondary seal.

**Identification Number: P-55-93(a2) [Tank #17]**

Equipment Description: 388,000 gallon welded emergency fire foam release/oily water storage tank.

Control Equipment: Internal aluminum floating roof (bolted) with a mechanical shoe primary seal and rim-mounted secondary seal.

**Identification Number: P-45-94(a2) [Tank #18]**

Equipment Description: 798,000 gallon welded gasoline storage tank.

Control Equipment: Internal steel floating roof (welded) with a mechanical shoe primary seal and rim-mounted secondary seal.

**Identification Number: P-69-93(a1) [Tank #19]**

Equipment Description: 316,000 gallon welded ethanol storage tank.

Control Equipment: Internal steel floating roof (welded) with a mechanical shoe primary seal and rim-mounted secondary seal.

**Identification Number: P-46-94(a1) [Tank #21]**

Equipment Description: 316,000 gallon welded ethanol storage tank.

Control Equipment: Internal steel floating roof (welded) with a mechanical shoe primary seal and rim-mounted secondary seal.

**Identification Number:** P-65-95(a1) [Loading Racks]

**Equipment Description:** **East Loading Rack:** Eight (8) gasoline product pumps (two at 40 HP & 800 g.p.m. each, four at 50 HP & 1,200 g.p.m. each, and two at 25 HP & 250 g.p.m. each), three (3) diesel product pumps at 60 HP each, one (1) product transfer pump at 20 HP & 600 g.p.m., two (2) vapor drop out pumps at 0.75 hp & 5 g.p.m. each, and one (1) pumpback pump at 5 HP & 350 g.p.m.; **Loading Rack, Lane #1** with two (2) gasoline arms, two (2) vapor recovery connections, one (1) ethanol arm, and two (2) diesel arms; **Loading Rack, Lane #2** with two (2) gasoline arms, two (2) vapor recovery connections, and two (2) diesel arms; **West Loading Rack:** Three (3) gasoline product pumps (one at 50 HP & 1,200 g.p.m., one at 40 HP & 800 g.p.m., and one at 20 HP & 400 g.p.m.); **Loading Rack, Lane #3** with two (2) gasoline arms, two (2) vapor recovery connections, and two (2) diesel arms; **Loading Rack, Lane #4** with two (2) gasoline arms, two (2) vapor recovery connections, and two (2) diesel arms.

**Control Equipment:** 27,000 ft<sup>3</sup> internal bladder vapor holder, PSV set @ 3" water column; John Zink Company vapor combustion unit, model ZTOF/TC with nominal rated 720,000 scf/day anti-flashback burner, and air assisted blower; automatic ignition pilot, burning natural gas (54 scfh @ 7 psig); liquid drum seal, PSV set @ 15 psig; total burner rating of 44.5 MMBtu/hr; 10 HP multi-stage centrifugal blower.

**Identification Number:** P-93-02 [Ethanol Truck Off-Loading]

**Equipment Description:** Truck off-loading pump and associated piping and fittings for the bulk transfer of ethanol.

**Control Equipment:** Air eliminator ducted to vapor recovery system (permitted under P-65-95(a1) [Loading Racks]).

**Identification Number:** P-39-03 [Ethanol Railcar Off-Loading]

**Equipment Description:** Two (2) railcar off-loading pumps and associated piping and fittings for the bulk transfer of ethanol.

Control Equipment: None.

**Identification Number:** P-1-90(t) [Waste-water Separator]

**Equipment Description:** Waste-water separator system: One (1) 10,000 gallon Loveless double wall separator; One (1) 2,300 gallon Loveless gravity-differential oil-water separator; 3 HP submersible water discharge pump rated at 320 GPM; 3 HP oil discharge pump rated at 20 GPM; Two (2) 5 HP pumps; 500 gallon pump tank.

**Control Equipment:** Two (2) pressure/vacuum valves on separator (4 oz. pressure and 1/2 oz. vacuum); Two (2) pressure/vacuum valves on sumps (1/2 oz. pressure and 1/2 oz. vacuum).

#### IV. TITLE V APPLICABILITY

The District issued Initial Title V Permit F-00012-0 to BP on November 26, 2002. The most current revision of the Permit, F-00012-5, has an expiration date of November 26, 2007. On May 24, 2007, the District received an application from BP to renew their Title V Permit pursuant to District Rule 3.8, Section 402.2.

The facility's potential to emit for volatile organic compounds (VOC) exceeds the District Title V threshold of 25 tons per year and is therefore subject to the requirements of District Rule 3.8. The facility emission totals are listed in Table 2:

Table 2. Criteria Pollutant Emissions

Criteria Pollutant Emissions (tons per year)					
Emission Unit Name	VOC	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>
P-43-01(a) [Tank #1]	4.17	-	-	-	-
P-44-01(a) [Tank #3]	3.20	-	-	-	-
P-45-01(a) [Tank #4]	3.13	-	-	-	-
P-46-01(a) [Tank #7]	0.04	-	-	-	-
P-47-01(a) [Tank #8]	0.04	-	-	-	-
P-48-01(a) [Tank #9]	0.04	-	-	-	-
P-49-01(a1) [Tank #10]	0.04	-	-	-	-
P-50-01(a1) [Tank #11]	0.04	-	-	-	-

P-51-01(a) [Tank #12]	0.04	-	-	-	-
P-54-93(a4) [Tank #15]	1.18	-	-	-	-
P-66-93(a1) [Tank #16]	0.96	-	-	-	-
P-55-93(a2) [Tank #17]	0.20	-	-	-	-
P-45-94(a2) [Tank #18]	1.38	-	-	-	-
P-69-93(a1) [Tank #19]	0.09	-	-	-	-
P-46-94(a1) [Tank #21]	0.09	-	-	-	-
P-65-95(a1) [Loading Racks]	17.97	71.92	13.22	-	-
P-93-02 [Ethanol Truck Off-Loading]	0.01	-	-	-	-
P-39-03 [Ethanol Railcar Off-Loading]	0.04	-	-	-	-
P-1-90(t) [Waste-water Separator]	0.09	-	-	-	-
<b>TOTAL</b>	<b>32.75</b>	<b>71.92</b>	<b>13.22</b>	<b>0.00</b>	<b>0.00</b>

**V. APPLICABLE FEDERAL REQUIREMENTS**

**Rule 2.3 - Ringelmann Chart**

**Rule Description**

This rule specifies the allowable opacity limit for sources in the District. The version of the rule used in this evaluation was adopted on October 1, 1971 and is part of the current California State Implementation Plan (SIP).

**Compliance Status**

The rule applies to all emission units at the stationary source. The source is currently in compliance with the rule.

**Permit Condition**

The Permit Holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:

- a. As dark or darker in shade as that designated as No. 2 on the Ringelmann

- Chart, as published by the United States Bureau of Mines; or
- b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this permit condition.  
[District Rule 2.3]

## **Rule 2.5 - Nuisance**

### **Rule Description**

This rule requires that sources are not a public nuisance. The version of the rule used in this evaluation was adopted on October 1, 1971 and is part of the current California SIP.

### **Compliance Status**

The rule applies to all emission units at the stationary source. The source is currently in compliance with the rule.

### **Permit Condition**

The Permit Holder shall 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 endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property. [District Rule 2.5]

[The permit condition is federally enforceable because it derives from District Rule 2.5 - Nuisance which is currently part of the California SIP. The District is taking steps to remove District Rule 2.5 from the SIP. Once the U.S. Environmental Protection Agency (EPA) has taken final action to remove District Rule 2.5 from the SIP, this permit condition will become state-enforceable only.]

## **Rule 2.17 - Circumvention**

### **Rule Description**

This rule prevents sources from concealing emissions to the atmosphere. The version of the rule used in this evaluation was adopted on October 1, 1971 and is part of the current California SIP.

### **Compliance Status**

The rule applies to all emission units at the stationary source. The source is currently in compliance with the rule.

### **Permit Condition**

The Permit Holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California or District Rules or Regulations. [District Rule 2.17]

### **Rule 2.21 - Organic Liquid Storage and Transfer**

#### **Rule Description**

This rule specifies requirements for organic liquid storage and/or transfer operations to limit emissions of VOC. The version of the rule used in this evaluation was adopted on September 14, 2005 and is part of the current California SIP.

#### **Compliance Status**

The rule applies to any storage tank with a capacity of greater than 250 gallons, any gasoline bulk plant, any terminal, or any transport vessel that stores or transfers an organic liquid with a true vapor pressure of 0.5 psia or greater. All gasoline and ethanol storage tanks (including the emergency fire foam release/oily water storage tank which may contain gasoline and/or ethanol) and bulk loading equipment at the stationary source are subject to this rule since gasoline and ethanol may have a true vapor pressure of greater than 0.5 psia at actual storage conditions. In addition, all diesel storage tanks at the stationary source are not subject to this rule since diesel does not have a true vapor pressure of equal to or greater than 0.5 psia at actual storage conditions. The permit will contain a condition for diesel storage tanks limiting the true vapor pressure of diesel fuel stored in these tanks to less than 0.5 psia at actual storage conditions. The source is currently in compliance with the rule.

#### **Permit Conditions**

Work Practice and Operational Requirements for All Diesel Storage Tanks

The following permit condition is applicable to the emission units listed in Table 3:

Table 3. Emission Units and Corresponding Authorities to Construct

Emission Unit	ATC Number		Emission Unit	ATC Number
P-46-01(a) [Tank #7]	C-02-219		P-49-01(a1) [Tank #10]	C-04-09
P-47-01(a) [Tank #8]	C-02-220		P-50-01(a1) [Tank #11]	C-03-36
P-48-01(a) [Tank #9]	C-02-221		P-51-01(a) [Tank #12]	C-02-197

The tank shall only be used to store diesel fuel with a true vapor pressure less than 0.5 psia under actual storage conditions, as determined by the test method specified in Section 602 of District Rule 2.21. [District Rule 2.21, §102]

Work Practice and Operational Requirements for All Gasoline and Ethanol Storage Tanks (Including Emergency Fire Foam Release/Oily Water Storage) Equipped with an Internal Floating Roof

The following permit conditions are applicable to the emission units listed in Table 4:

Table 4. Emission Units and Corresponding Authorities to Construct

Emission Unit	ATC Number		Emission Unit	ATC Number
P-43-01(a) [Tank #1]	C-02-216		P-45-94(a2) [Tank #18]	C-06-65
P-44-01(a) [Tank #3]	C-02-217		P-69-93(a1) [Tank #19]	C-02-127
P-45-01(a) [Tank #4]	C-02-218		P-46-94(a1) [Tank #21]	C-02-126
P-54-93(a4) [Tank #15]	C-04-148		P-55-93(a2) [Tank #17]	C-02-128
P-66-93(a1) [Tank #16]	C-01-130 (Revised)			

Organic liquid shall not be visible above the floating roof. [District Rule 2.21, §301.2]

The floating roof shall be in contact with the liquid contents (but not necessarily in complete contact with it) at all times except when the storage tank is completely emptied, and subsequently refilled. During this period, emptying or refilling shall be a continuous process. [District Rule 2.21, §301.3]

The Permit Holder shall provide written notification to the Air Pollution Control Officer (APCO) at least 7 days prior to landing the floating roof on its legs. [District Rule 2.21, §301.4]

The installation of a new or replacement primary seal shall be a mechanical shoe seal or liquid mounted seal. For existing resilient toroid seals, replacement means adding, replacing, or altering more than 5% of the seal foam or cover material. [District Rule 2.21, §301.5]

Internal floating roofs shall consist of two seals, one above the other; the one below shall be referred to as the primary seal, and the one above shall be referred to as the secondary seal. [District Rule 2.21, §303.1]

Vapor concentrations above an internal floating roof shall not exceed 30% of its lower explosive limit (LEL). [District Rule 2.21, §303.2]

All internal floating roof tanks shall be equipped with at least 3 viewing ports. The viewports shall be installed on the fixed roof an equidistance apart and in such a manner so that each viewport provides an unobstructed view of the tank wall and roof seal. An alternate number or size of viewports may be approved at the discretion of the APCO. [District Rule 2.21, §303.3]

Fixed roof support columns and wells shall be equipped with a sliding gasketed cover or with a flexible fabric sleeve. [District Rule 2.21, §305.1.a]

Ladder wells shall be equipped with a gasketed cover. The cover shall be closed at all times, with no visible gaps, except when the well must be opened for access. [District Rule 2.21, §305.1.b]

Slotted and solid guidepoles shall comply with the requirements specified in District Rule 2.21, Section 305.2.h. [District Rule 2.21, §305.1.c]

Vacuum breakers shall be equipped with a gasket, with no visible gaps, and shall 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. [District Rule 2.21, §305.1.d & §305.2.b]

Rim vents shall be equipped with a gasket, with no visible gaps, and shall be set to open only when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. [District Rule 2.21, §305.1.d & §305.2.c]

Each access hatch and gauge float well shall be equipped with a cover that is gasketed and bolted. The cover shall be closed at all times, with no visible gaps, except when the hatch or well must be opened for access. [District Rule 2.21, §305.1.d & §305.2.g]

There shall be no holes, tears, or openings which allow the emission of organic vapors through the secondary seal. [District Rule 2.21, §306.1 & §307.1]

For any storage tank equipped with a mechanical shoe primary seal, there shall be no holes, tears, or openings in the primary seal envelope surrounding the annular vapor space enclosed by the roof edge, stored liquid surface, shoe, and seal fabric. [District Rule 2.21, §306.1]

For any storage tank equipped with a resilient toroid primary seal, there shall be no holes, tears, or openings in the primary seal. [District Rule 2.21, §307.1]

For any storage tank equipped with a mechanical shoe primary seal, the geometry of the shoe shall be such that the gap between the shoe and the storage tank shell shall not exceed twice the seal gap criteria for a vertical length greater than 18 inches. [District Rule 2.21, §306.3]

For any storage tank equipped with a mechanical shoe primary seal, no gap between the storage tank shell and the primary seal shall exceed:

- a. 1-1/2 inch;
- b. 1/2 inch for a cumulative length greater than 10% of the circumference of the tank;
- c. 1/8 inch for a continuous length of more than 10% of the circumference of the tank;
- d. 1/8 inch for a cumulative length greater than 30% of the circumference of the tank. [District Rule 2.21, §306.4]

For any storage tank equipped with a resilient toroid primary seal, no gap between the storage tank shell and the primary seal shall exceed:

- a. 1/2 inch;
- b. 1/8 inch for a cumulative length greater than 5% of the circumference of the storage tank. [District Rule 2.21, §307.2]

Any secondary seal shall extend from the floating roof to the storage tank shell and shall not be attached to the primary seal. [District Rule 2.21, §306.5 & §307.3]

For secondary seals installed after March 23, 1995, no gap between the storage tank shell and the secondary seal shall exceed:

- a. 0.06 inch;
- b. 0.02 inch for a cumulative length greater than 5% of the circumference of the tank excluding gaps less than 1.79 inches from vertical weld seams. [District Rule 2.21, §306.5 & §307.3]

No gap between the storage tank shell and the secondary seal shall exceed:

- a. 1/2 inch;
- b. 1/8 inch for a cumulative length greater than 5% of the circumference of the storage tank. [District Rule 2.21, §306.6 & §307.4]

For any storage tank equipped with a mechanical shoe primary seal, the secondary seal shall allow easy insertion of probes up to 1-1/2 inch in width in order to measure gaps in the primary seal. [District Rule 2.21, §306.7]

For any storage tank equipped with a resilient toroid primary seal, the secondary seal shall allow easy insertion of probes up to 1/2 inch in width in order to measure gaps in the primary seal. [District Rule 2.21, §307.5]

Organic liquids subject to District Rule 2.21 shall not be discarded to public sewers, stored in open containers, or handled in any other manner that would result in evaporation to the atmosphere. [District Rule 2.21, §314]

The degassing of any storage tank shall be controlled by a system which collects and processes all organic vapors and gases and has an abatement efficiency of at least 90% by weight. The system shall be operated until the concentration of volatile organic compounds in the tank is less than 10,000 ppm expressed as methane as determined in accordance with the test method specified in Section 605 of District Rule 2.21. [District Rule 2.21, §315]

The Permit Holder shall submit a maintenance plan to the APCO at least 7 days prior to performing maintenance on any storage tank. The plan shall state the equipment Permit to Operate number (unit identification number), a detailed

description of the maintenance to be performed, the expected duration of the maintenance, the reason that the maintenance is necessary, emission control measures that will be employed, and the effect of not performing the maintenance. [District Rule 2.21, §501]

Monitoring and Testing Requirements for All Gasoline and Ethanol Storage Tanks (Including Emergency Fire Foam Release/Oily Water Storage) Equipped with an Internal Floating Roof

The following permit conditions are applicable to the emission units listed in Table 5:

Table 5. Emission Units and Corresponding Authorities to Construct

Emission Unit	ATC Number		Emission Unit	ATC Number
P-43-01(a) [Tank #1]	C-02-216		P-45-94(a2) [Tank #18]	C-06-65
P-44-01(a) [Tank #3]	C-02-217		P-69-93(a1) [Tank #19]	C-02-127
P-45-01(a) [Tank #4]	C-02-218		P-46-94(a1) [Tank #21]	C-02-126
P-54-93(a4) [Tank #15]	C-04-148		P-55-93(a2) [Tank #17]	C-02-128
P-66-93(a1) [Tank #16]	C-01-130 (Revised)			

The Permit Holder shall submit written notification to the APCO at least 7 days prior to performing monitoring on any storage tank. [District Rule 2.21, §502]

The Permit Holder shall visually inspect the secondary seal, floating roof, and deck fittings and use an explosimeter that is calibrated in accordance with the manufacturer’s specifications to measure the LEL of the storage tank. For each storage tank, inspections and measurements shall be completed at least once every 3 months at a distance of no less than 4 feet from the storage tank viewport or access hatch. [District Rule 2.21, §502.2.a]

The Permit Holder shall perform complete gap measurements of the primary and secondary seals at least once every 10 years. [District Rule 2.21, §502.2.b]

\*NOTE: For emission units P-54-93(a4) [Tank #15] and P-66-93(a1) [Tank #16],

this District Rule 2.21 requirement is streamlined by a more stringent District Rule 3.4 requirement. The streamlining demonstration is present at the end of this section.

The Permit Holder shall perform complete gap measurements of the primary and secondary seals each time the tank is emptied and degassed. [District Rule 2.21, §502.2.b]

The Permit Holder shall perform complete gap measurements of all deck fittings at least once every 10 years and each time the tank is emptied and degassed. [District Rule 2.21, §502.2.c]

The Permit Holder shall conduct all visual inspections, LEL measurements, and gap measurements in accordance with the District-approved report format. [District Rule 2.21, §502.2]

The Permit Holder shall submit all monitoring reports to the APCO within 45 calendar days after the monitoring work is completed. All monitoring reports shall include sufficient detail to verify compliance with all applicable requirements of District Rule 2.21. [District Rule 2.21, §503.1]

### **Streamlining Demonstration**

For P-54-93(a4) [Tank #15] and P-66-93(a1) [Tank #16], the following requirement of District Rule 2.21 can be streamlined by a permit condition required by District Rule 3.4, New Source Review. The streamlined monitoring and testing permit condition is shown below:

Streamlined Permit Condition: The Permit Holder shall perform complete gap measurements of the primary and secondary seals at least once every 10 years. [District Rule 2.21, §502.2.b]

Permit Condition: For P-54-93(a4) [Tank #15] and P-66-93(a1) [Tank #16], the Permit Holder shall conduct actual gap measurements of the primary seal and secondary seal at least once every 60 months. [District Rule 3.4/C-04-148 and C-01-130 (revised)]

### **Work Practice and Operational Requirements for Organic Liquid Transfer Equipment for Transport Vessel Loading (Loading Racks)**

For P-65-95(a1) [Loading Racks], the Permit Holder shall not transfer or permit to

be transferred organic liquid into any transport vessel unless the loading racks are equipped with a California Air Resources Board (CARB) certified vapor recovery system pursuant to Section 41954 of the California Health and Safety Code that is operated and maintained in compliance with the requirements of such certification. [District Rule 2.21, §308]

For P-65-95(a1) [Loading Racks], the Permit Holder shall not transfer or permit to be transferred organic liquid into any transport vessel unless the VOC emissions to the atmosphere do not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District Rule 2.21, §308.1]

For P-65-95(a1) [Loading Racks], all organic liquid loading equipment shall be maintained to be leak free, gas tight, and in good working order. [District Rule 2.21, §308.2]

For P-65-95(a1) [Loading Racks], during transfer operations, the allowed drainage during disconnect of any transport vessels shall be no more than ten milliliters liquid, averaged over three disconnects. [District Rule 2.21, §308.3]

For P-65-95(a1) [Loading Racks], all transport vessel loading operations shall be accomplished by bottom loading. [District Rule 2.21, §308.4]

For P-65-95(a1) [Loading Racks], organic liquids subject to District Rule 2.21 shall not be discarded to public sewers, stored in open containers, or handled in any other manner that would result in evaporation to the atmosphere. [District Rule 2.21, §314]

For P-65-95(a1) [Loading Racks], the Permit Holder shall submit a maintenance plan to the APCO at least 7 days prior to performing maintenance on the loading racks. The plan shall state the equipment Permit to Operate number (unit identification number), a detailed description of the maintenance to be performed, the expected duration of the maintenance, the reason that the maintenance is necessary, emission control measures that will be employed, and the effect of not performing the maintenance. [District Rule 2.21, §501]

#### Monitoring and Testing Requirements for Organic Liquid Transfer Equipment for Transport Vessel Loading (Loading Racks)

For P-65-95(a1) [Loading Racks], the Permit Holder shall perform a source test to measure the vapor recovery system emission rate at least once every 12 months in accordance with the test method specified in District Rule 2.21, Section 607. The

source test shall be conducted in accordance with the District-approved report format and the terminal operating conditions shall correspond to those established during the testing conducted for the initial certification criterion. [District Rule 2.21, §502.3]

For P-65-95(a1) [Loading Racks], all source tests performed shall be documented in a report in accordance with the test methods and procedures specified in Section 600. The report shall include sufficient detail to verify compliance with all applicable rule requirements and shall be submitted to the APCO within 45 calendar days after the completion of the test. The source test report shall include the date of the test and names and titles of personnel performing the test. [District Rule 2.21, §503.2]

Record-keeping Requirements for All Gasoline and Ethanol Storage Tanks (Including Emergency Fire Foam Release/Oily Water Storage) Equipped with an Internal Floating Roof and Organic Liquid Transfer Equipment for Transport Vessel Loading (Loading Racks)

The following permit conditions are applicable to the emission units listed in Table 6:

Table 6. Emission Units and Corresponding Authorities to Construct

Emission Unit	ATC Number		Emission Unit	ATC Number
P-43-01(a) [Tank #1]	C-02-216		P-45-94(a2) [Tank #18]	C-06-65
P-44-01(a) [Tank #3]	C-02-217		P-69-93(a1) [Tank #19]	C-02-127
P-45-01(a) [Tank #4]	C-02-218		P-46-94(a1) [Tank #21]	C-02-126
P-54-93(a4) [Tank #15]	C-04-148		P-55-93(a2) [Tank #17]	C-02-128
P-66-93(a1) [Tank #16]	C-01-130 (Revised)		P-65-95(a1) [Loading Racks]	C-04-147

The Permit Holder shall submit throughput reports to the APCO no later than March 31 for the previous calendar year. Storage tank throughput reports shall include the actual quarterly volume of organic liquid transferred into each tank. Bulk loading throughput reports shall include the actual quarterly volume of organic liquid

transferred. [District Rule 2.21, §503.3]

The Permit Holder shall maintain accurate records to demonstrate compliance in accordance with the requirements of District Rule 2.21, Sections 501, 502, and 503 on site for a period of at least 5 years and make such records available to the APCO upon request. [District Rule 2.21, §504]

### **Rule 2.23 - Fugitive Hydrocarbon Emissions**

#### **Rule Description**

This rule specifies requirements for the control of fugitive hydrocarbon emissions from oil and gas production and processing facilities, refineries, chemical plants, gasoline terminals, and pipeline transfer stations in conformance with Reasonably Available Control Technology determinations approved by CARB to meet the requirements of the California Clean Air Act. The version of the rule used in this evaluation was adopted on August 13, 1997 and is part of the current California SIP.

#### **Compliance Status**

The rule applies to all equipment components associated with the storage and transfer of gasoline (including equipment components associated with the storage and transfer of emergency fire foam release/oily water - which may contain gasoline). Section 102 - Applicability specifically lists gasoline terminals, but makes no mention of diesel or ethanol terminals. Therefore, all equipment components associated with the storage and transfer of diesel and ethanol are not subject to this rule. The source is currently in compliance with the rule.

#### **Permit Conditions**

##### **Work Practice and Operational Requirements for All Gasoline Storage Tanks and Gasoline Transfer Equipment (Including Emergency Fire Foam Release/Oily Water Storage and Transfer Equipment)**

The following permit conditions are applicable to the emission units listed in Table 7:

Table 7. Emission Units and Corresponding Authorities to Construct

<b>Emission Unit</b>	<b>ATC Number</b>		<b>Emission Unit</b>	<b>ATC Number</b>
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P-43-01(a) [Tank #1]	C-02-216		P-66-93(a1) [Tank #16]	C-01-130 (Revised)
P-44-01(a) [Tank #3]	C-02-217		P-45-94(a2) [Tank #18]	C-06-65
P-45-01(a) [Tank #4]	C-02-218		P-55-93(a2) [Tank #17]	C-02-128
P-54-93(a4) [Tank #15]	C-04-148		P-65-95(a1) [Loading Racks]	C-04-147

All pump seals, compressor seals, and pressure relief devices shall be inspected for leaks once during every manned operating shift or every eight-hour period. A leak shall include any liquid leak, a visual vapor leak, audible leaks, the presence of bubbles using soap solutions, or a leak identified by a vapor analyzer. [District Rule 2.23, §301.1.a]

Any leak which is identified during the inspection of components shall be measured to quantify emission concentrations according to EPA Reference Method 21. [District Rule 2.23, §301.1.b]

All components shall be inspected quarterly according to EPA Reference Method 21, except as provided below:

- a. All inaccessible components shall be inspected annually according to EPA Reference Method 21.
- b. All threaded connections and flanges shall be inspected for leaks according to EPA Reference Method 21 immediately after being placed in service and annually thereafter.
- c. The inspection frequency for components, except pump seals and compressor seals, may change from quarterly to annually, provided that all of the following conditions are met:
  1. All components at the facility have been successfully operated and maintained with no liquid leaks and no major gas leaks exceeding 0.5 percent of the total components inspected per inspection period for twelve consecutive months, and
  2. The above is substantiated by documentation and written approval obtained from the APCO.
- d. Any annual inspection frequency approved by the APCO shall revert to quarterly, should any liquid leak or major gas leak be detected exceeding 0.5 percent of the total components inspected per inspection period. [District Rule 2.23, §301.2, §301.3, §301.5, §301.6, and §301.8]

A pressure relief device shall be inspected according to EPA Reference Method 21 within three (3) calendar days after every pressure relief. [District Rule 2.23, §301.4]

All leaking components shall be affixed with brightly colored, weatherproof tags showing the date of leak detection. These tags shall remain in place until the components are repaired and reinspected. [District Rule 2.23, §301.7]

All non-critical components shall be successfully repaired or replaced within the following time periods after detection of the leak according to the Table 8, Repair Periods. [District Rule 2.23, §302.1.a]

Table 8. Repair Periods

Type of Leak	Time Period <sup>1</sup>
Minor Gas Leak	14 Days
Major Gas Leak	5 Days
Major Gas Leak over 50,000 ppm	1 Day <sup>2</sup>
Major Liquid Leak	1 Day <sup>2</sup>
Minor Liquid Leak	2 Days <sup>2</sup>

1. Day means a 24 hour period from the time of leak detection.

2. Unless prohibited by California Occupational Safety and Health Administration (CAL OSHA) standards.

Leaks from components shall be immediately minimized to stop or reduce leakage to the atmosphere. [District Rule 2.23, §302.1.b]

All leaks from critical components shall be minimized to the extent possible and shall be replaced with Best Available Control Technology equipment as determined in accordance with District Rule 3.4, NEW SOURCE REVIEW, during the next process unit turnaround. [District Rule 2.23, §302.1.c]

All repaired or replaced components shall be re-inspected per EPA Reference Method 21 by the Permit Holder within 30 days of the repair or replacement. [District Rule 2.23, §302.2]

A component or parts which incur five repair actions for a liquid or major gas leak within a continuous twelve-month period shall be replaced with Best Available Control Technology equipment as determined in accordance with District Rule 3.4, NEW SOURCE REVIEW. [District Rule 2.23 §302.3]

Open-ended lines and valves located at the end of lines shall be sealed with a blind flange, plug, cap, or a second closed valve at all times except during operations. Operations include draining or degassing operations, connection of temporary process equipment, sampling of process streams, emergency venting, and other normal operational needs. [District Rule 2.23, §303]

Hatches shall be closed at all times except during sampling, adding process materials, or attended maintenance operations. [District Rule 2.23, §304]

The Permit Holder shall not use a pressure relief device on any equipment if the concentration of volatile organic compounds and methane in such a device exceeds 100 ppm (expressed as methane) above background. [District Rule 2.23, §305.2]

During the next process unit turnaround, the Permit Holder shall replace a non-repairable pressure relief device with a device that meets the requirements of District Rule 2.23, Section 305.2. For the purposes this permit condition, a non-repairable pressure relief device is any such device that cannot be taken out of service without shutting down the process which it serves. [District Rule 2.23, §305.3]

During the next process unit turnaround, the Permit Holder shall replace an inaccessible pressure relief device with a device that meets the requirements of District Rule 2.23, Section 305.2. [District Rule 2.23, §305.4]

All major components and critical components shall be clearly and visibly physically identified for inspection, repair, replacement, and record-keeping purposes. [District Rule 2.23, §401.1]

All major, critical, and inaccessible components except flanges and threaded connections shall be clearly identified in diagrams for inspection, repair, replacement, and record-keeping purposes as approved by the APCO. [District Rule 2.23, §401.2]

The information required for component identification shall be submitted to the APCO upon request. [District Rule 2.23, §401.3]

The Permit Holder shall notify the APCO in writing of any change in the identification of a major component. [District Rule 2.23, §401.4]

Record-keeping Requirements for All Gasoline Storage Tanks and Gasoline Transfer Equipment (Including Emergency Fire Foam Release/Oily Water Storage and

Transfer Equipment)

The following permit conditions are applicable to the emission units listed in Table 9:

Table 9. Emission Units and Corresponding Authorities to Construct

Emission Unit	ATC Number		Emission Unit	ATC Number
P-43-01(a) [Tank #1]	C-02-216		P-66-93(a1) [Tank #16]	C-01-130 (Revised)
P-44-01(a) [Tank #3]	C-02-217		P-45-94(a2) [Tank #18]	C-06-65
P-45-01(a) [Tank #4]	C-02-218		P-55-93(a2) [Tank #17]	C-02-128
P-54-93(a4) [Tank #15]	C-04-148		P-65-95(a1) [Loading Racks]	C-04-147

All records of operator inspection and repair shall be maintained at the facility for the previous five (5) year period and made available at the time of District inspection. [District Rule 2.23, §501]

The Permit Holder shall maintain an inspection log, containing at a minimum, the following:

- a. Name, location, type of components, and description of any unit where leaking components are found;
- b. Date of leak detection, emission level (ppm) of leak, and method of leak detection;
- c. Date and emission level (ppm) of recheck after leak is repaired; and
- d. Total number of components inspected and a total number and percentage of leaking components found by component types. [District Rule 2.23, §502]

Records of leaks detected by a quarterly or annual operator inspection, and each subsequent repair and reinspection, shall be submitted to the APCO upon request. [District Rule 2.23, §503]

**Rule 3.1 - General Permit Requirements**

**Rule Description**

The purpose of this rule is to provide an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits. The version of the rule used in this evaluation was adopted on February 23, 1994 and is part of the current California SIP.

### **Compliance Status**

The rule applies to all emission units at the stationary source. The source is currently in compliance with the rule.

### **Permit Conditions**

#### **Facility-wide General Permit Conditions for All Emission Units**

The following facility-wide general permit conditions are applicable to all emission units:

No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the Air Pollution Control Officer as specified in Section 401 of District Rule 3.1. [District Rule 3.1, §301.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the Air Pollution Control Officer. [District Rule 3.1, §302.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the Air Pollution Control Officer or the Hearing Board. [District Rule 3.1, §302.2]

The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular

workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1, §405.3]

#### Work Practice and Operational Requirements for Specific Emission Units

For P-65-95(a1) [Loading Racks], the vapor-laden delivery vessels may be refilled only through a vapor control system that ensures the vapor recovery system is connected before organic liquid can be transferred into the delivery vessel. [District Rule 3.1, §402/C-04-147]

For P-65-95(a1) [Loading Racks], the vapor recovery system shall be maintained and operated in a manner that prevents gauge pressure in the delivery vessel from exceeding 18 inches of water column or 6 inches of water vacuum during product loading. [District Rule 3.1, §402/C-04-147]

For P-1-90(t) [Waste-water Separator], product transfer piping, flanges, and valves shall be leak tight. [District Rule 3.1, §402/C-88-36]

#### Monitoring and Testing Requirements for Specific Emission Units

For P-65-95(a1) [Loading Racks], the Permit Holder shall install and maintain such facilities as are necessary for sampling and testing purposes. The number, size, and location of sampling ports shall be in accordance with Air Resources Board Test Method 1. The location and access to the sampling platform shall be in accordance with the General Industry Safety Orders of the State of California. [District Rule 3.1, §303.2/C-04-147]

For P-65-95(a1) [Loading Racks], the District must be notified prior to any source test event, and a protocol must be submitted for approval 14 days prior to testing. The protocol shall be mailed to the attention of the Supervising Air Quality Engineer. [District Rule 3.1, §402/C-04-147]

#### Record-keeping Requirements for Specific Emission Units

The following permit condition is applicable to the emission units listed in Table 10:

Table 10. Emission Units and Corresponding Authorities to Construct

Emission Unit	ATC Number		Emission Unit	ATC Number
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P-43-01(a) [Tank #1]	C-02-216		P-46-94(a1) [Tank #21]	C-02-126
P-44-01(a) [Tank #3]	C-02-217		P-46-01(a) [Tank #7]	C-02-219
P-45-01(a) [Tank #4]	C-02-218		P-47-01(a) [Tank #8]	C-02-220
P-54-93(a4) [Tank #15]	C-04-148		P-48-01(a) [Tank #9]	C-02-221
P-66-93(a1) [Tank #16]	C-01-130 (Revised)		P-49-01(a1) [Tank #10]	C-04-09
P-45-94(a2) [Tank #18]	C-06-65		P-50-01(a1) [Tank #11]	C-03-36
P-55-93(a2) [Tank #17]	C-02-128		P-51-01(a) [Tank #12]	C-02-197
P-69-93(a1) [Tank #19]	C-02-127			

The Permit Holder shall maintain records of the actual volume of material transferred into this tank (including inter tank transfers) on a quarterly basis. Records shall be maintained for a period of five (5) years and shall be made readily available to the Air Pollution Control Officer upon request. [District Rule 3.1, §402]

The following permit condition is applicable to the emission units listed in Table 11:

Table 11. Emission Units and Corresponding Authorities to Construct

Emission Unit	ATC Number		Emission Unit	ATC Number
P-54-93(a4) [Tank #15]	C-04-148		P-45-94(a2) [Tank #18]	C-06-65
P-66-93(a1) [Tank #16]	C-01-130 (Revised)			

The Permit Holder shall maintain records of the quarterly RVP sampling analysis. Records shall be maintained for a period of five (5) years and shall be made readily available to the Air Pollution Control Officer upon request. [District Rule 3.1, §402]

For P-65-95(a1) [Loading Racks], the Permit Holder shall maintain records of the cumulative quarterly and annual gasoline/ethanol and diesel loaded. The records shall be updated quarterly and made available to the District upon request. Historic annual data for the five (5) previous calendar years shall be kept and made available to the District upon request. [District Rule 3.1, §402/C-04-147]

For P-93-02 [Ethanol Truck Off-Loading] and P-39-03 [Ethanol Railcar Off-Loading], the Permit Holder shall maintain records of the actual volume of material unloaded with this equipment on a quarterly basis. Records shall be maintained for a period of five (5) years and shall be made readily available to the Air Pollution Control Officer upon request. [District Rule 3.1, §402/C-02-129 and C-03-20 (revised)]

### **Rule 3.4 - New Source Review**

#### **Rule Description**

This rule applies to all new stationary sources and emission units and all modifications to existing stationary sources and emission units which are subject to District Rule 3.1, General Permit Requirements, and which, after construction or modification, emit or may emit any affected pollutants. This rule shall not apply to prescribed burning of forest, agriculture or range land, road construction, or any other non-point source common to timber harvesting or agricultural practices. The purpose of this rule is to provide for the review of new and modified stationary air pollution sources and to provide mechanisms, including emission offsets, by which authorities to construct such sources may be granted without interfering with the attainment or maintenance of ambient air quality standards. The version of the rule used in this evaluation was adopted on August 13, 1997 and is part of the current California SIP.

#### **Compliance Status**

The source has satisfied the provisions of New Source Review. The New Source Review requirements were imposed on the most recent Authorities to Construct issued to the source. The New Source Review Requirements are shown below.

#### **Permit Conditions**

##### **Emission Limitations**

The VOC emissions from P-43-01(a) [Tank #1] shall not exceed 1,798 lb/1<sup>st</sup> calendar quarter, 2,211 lb/2<sup>nd</sup> calendar quarter, 2,440 lb/3<sup>rd</sup> calendar quarter, 1,884

lb/4<sup>th</sup> calendar quarter, and 4.17 tons/year. [District Rule 3.4/C-02-216]

The VOC emissions from P-44-01(a) [Tank #3] shall not exceed 1,381 lb/1<sup>st</sup> calendar quarter, 1,701 lb/2<sup>nd</sup> calendar quarter, 1,879 lb/3<sup>rd</sup> calendar quarter, 1,447 lb/4<sup>th</sup> calendar quarter, and 3.20 tons/year. [District Rule 3.4/C-02-217]

The VOC emissions from P-45-01(a) [Tank #4] shall not exceed 1,345 lb/1<sup>st</sup> calendar quarter, 1,666 lb/2<sup>nd</sup> calendar quarter, 1,283 lb/3<sup>rd</sup> calendar quarter, 1,412 lb/4<sup>th</sup> calendar quarter, and 3.13 tons/year. [District Rule 3.4/C-02-218]

The VOC emissions from P-46-01(a) [Tank #7] shall not exceed 20 lb/1<sup>st</sup> calendar quarter, 20 lb/2<sup>nd</sup> calendar quarter, 20 lb/3<sup>rd</sup> calendar quarter, 20 lb/4<sup>th</sup> calendar quarter, and 0.04 tons/year. [District Rule 3.4/C-02-219]

The VOC emissions from P-47-01(a) [Tank #8] shall not exceed 20 lb/1<sup>st</sup> calendar quarter, 20 lb/2<sup>nd</sup> calendar quarter, 20 lb/3<sup>rd</sup> calendar quarter, 20 lb/4<sup>th</sup> calendar quarter, and 0.04 tons/year. [District Rule 3.4/C-02-220]

The VOC emissions from P-48-01(a) [Tank #9] shall not exceed 20 lb/1<sup>st</sup> calendar quarter, 20 lb/2<sup>nd</sup> calendar quarter, 20 lb/3<sup>rd</sup> calendar quarter, 20 lb/4<sup>th</sup> calendar quarter, and 0.04 tons/year. [District Rule 3.4/C-02-221]

The VOC emissions from P-49-01(a1) [Tank #10] shall not exceed 20 lb/1<sup>st</sup> calendar quarter, 20 lb/2<sup>nd</sup> calendar quarter, 20 lb/3<sup>rd</sup> calendar quarter, 20 lb/4<sup>th</sup> calendar quarter, and 0.04 tons/year. [District Rule 3.4/C-04-09]

The VOC emissions from P-50-01(a1) [Tank #11] shall not exceed 20 lb/1<sup>st</sup> calendar quarter, 20 lb/2<sup>nd</sup> calendar quarter, 20 lb/3<sup>rd</sup> calendar quarter, 20 lb/4<sup>th</sup> calendar quarter, and 0.04 tons/year. [District Rule 3.4/C-03-36]

The VOC emissions from P-51-01(a) [Tank #12] shall not exceed 20 lb/1<sup>st</sup> calendar quarter, 20 lb/2<sup>nd</sup> calendar quarter, 21 lb/3<sup>rd</sup> calendar quarter, 20 lb/4<sup>th</sup> calendar quarter, and 0.04 tons/year. [District Rule 3.4/C-02-197]

The VOC emissions from P-54-93(a4) [Tank #15] shall not exceed 683 lb/1<sup>st</sup> calendar quarter, 455 lb/2<sup>nd</sup> calendar quarter, 490 lb/3<sup>rd</sup> calendar quarter, 713 lb/4<sup>th</sup> calendar quarter, and 1.17 tons/year. [District Rule 3.4/C-04-148]

The VOC emissions from P-66-93(a1) [Tank #16] shall not exceed 568 lb/1<sup>st</sup> calendar quarter, 364 lb/2<sup>nd</sup> calendar quarter, 396 lb/3<sup>rd</sup> calendar quarter, 594 lb/4<sup>th</sup> calendar quarter, and 0.96 tons/year. [District Rule 3.4/C-01-130 (revised)]

The VOC emissions from P-55-93(a2) [Tank #17] shall not exceed 117 lb/1<sup>st</sup> calendar quarter, 75 lb/2<sup>nd</sup> calendar quarter, 78 lb/3<sup>rd</sup> calendar quarter, 131 lb/4<sup>th</sup> calendar quarter, and 0.20 tons/year. [District Rule 3.4/C-02-128]

The VOC emissions from P-45-94(a2) [Tank #18] shall not exceed 841 lb/1<sup>st</sup> calendar quarter, 501 lb/2<sup>nd</sup> calendar quarter, 544 lb/3<sup>rd</sup> calendar quarter, 881 lb/4<sup>th</sup> calendar quarter, and 1.38 tons/year. [District Rule 3.4/C-06-65]

The VOC emissions from P-69-93(a1) [Tank #19] shall not exceed 44 lb/1<sup>st</sup> calendar quarter, 48 lb/2<sup>nd</sup> calendar quarter, 51 lb/3<sup>rd</sup> calendar quarter, 45 lb/4<sup>th</sup> calendar quarter, and 0.09 tons/year. [District Rule 3.4/C-02-127]

The VOC emissions from P-46-94(a1) [Tank #21] shall not exceed 44 lb/1<sup>st</sup> calendar quarter, 48 lb/2<sup>nd</sup> calendar quarter, 51 lb/3<sup>rd</sup> calendar quarter, 45 lb/4<sup>th</sup> calendar quarter, and 0.09 tons/year. [District Rule 3.4/C-02-126]

The VOC emissions from P-65-95(a1) [Loading Racks] shall not exceed 11,202 lb/1<sup>st</sup> calendar quarter, 11,202 lb/2<sup>nd</sup> calendar quarter, 11,202 lb/3<sup>rd</sup> calendar quarter, 11,202 lb/4<sup>th</sup> calendar quarter, and 17.97 tons/year. [District Rule 3.4/C-04-147]

The CO emissions from P-65-95(a1) [Loading Racks] shall not exceed 44,832 lb/1<sup>st</sup> calendar quarter, 44,832 lb/2<sup>nd</sup> calendar quarter, 44,832 lb/3<sup>rd</sup> calendar quarter, 44,832 lb/4<sup>th</sup> calendar quarter, and 71.92 tons/year. [District Rule 3.4/C-04-147]

The NO<sub>x</sub> emissions from P-65-95(a1) [Loading Racks] shall not exceed 8,241 lb/1<sup>st</sup> calendar quarter, 8,241 lb/2<sup>nd</sup> calendar quarter, 8,241 lb/3<sup>rd</sup> calendar quarter, 8,241 lb/4<sup>th</sup> calendar quarter, and 13.22 tons/year. [District Rule 3.4/C-04-147]

The VOC emissions from P-93-02 [Ethanol Truck Off-Loading] shall not exceed 7 lb/1<sup>st</sup> calendar quarter, 7 lb/2<sup>nd</sup> calendar quarter, 7 lb/3<sup>rd</sup> calendar quarter, 7 lb/4<sup>th</sup> calendar quarter, and 0.01 tons/year. [District Rule 3.4/C-02-129]

The VOC emissions from P-39-03 [Ethanol Railcar Off-Loading] shall not exceed 21 lb/1<sup>st</sup> calendar quarter, 21 lb/2<sup>nd</sup> calendar quarter, 21 lb/3<sup>rd</sup> calendar quarter, 21 lb/4<sup>th</sup> calendar quarter, and 0.04 tons/year. [District Rule 3.4/C-03-20 (revised)]

The VOC emissions from P-1-90(t) [Waste-water Separator] shall not exceed 44 lb/1<sup>st</sup> calendar quarter, 45 lb/2<sup>nd</sup> calendar quarter, 45 lb/3<sup>rd</sup> calendar quarter, 45 lb/4<sup>th</sup> calendar quarter, and 0.09 tons/year. [District Rule 3.4/C-88-36]

### Work Practice and Operational Requirements - Throughput Limitations

For P-43-01(a) [Tank #1], the amount of gasoline transferred shall not exceed 49.85 million gallons/1<sup>st</sup> calendar quarter, 49.85 million gallons/2<sup>nd</sup> calendar quarter, 49.85 million gallons/3<sup>rd</sup> calendar quarter, 49.85 million gallons/4<sup>th</sup> calendar quarter, and 199.4 million gallons/year. [District Rule 3.4/C-02-216]

For P-44-01(a) [Tank #3], the amount of gasoline transferred shall not exceed 29.275 million gallons/1<sup>st</sup> calendar quarter, 29.275 million gallons/2<sup>nd</sup> calendar quarter, 29.275 million gallons/3<sup>rd</sup> calendar quarter, 29.275 million gallons/4<sup>th</sup> calendar quarter, and 117.1 million gallons/year. [District Rule 3.4/C-02-217]

For P-45-01(a) [Tank #4], the amount of gasoline transferred shall not exceed 13.961 million gallons/1<sup>st</sup> calendar quarter, 13.961 million gallons/2<sup>nd</sup> calendar quarter, 13.961 million gallons/3<sup>rd</sup> calendar quarter, 13.961 million gallons/4<sup>th</sup> calendar quarter, and 55.845 million gallons/year. [District Rule 3.4/C-02-218]

For P-46-01(a) [Tank #7], the amount of diesel transferred shall not exceed 4.032 million gallons/1<sup>st</sup> calendar quarter, 4.032 million gallons/2<sup>nd</sup> calendar quarter, 4.032 million gallons/3<sup>rd</sup> calendar quarter, 4.032 million gallons/4<sup>th</sup> calendar quarter, and 16.128 million gallons/year. [District Rule 3.4/C-02-219]

For P-47-01(a) [Tank #8], the amount of diesel transferred shall not exceed 4.032 million gallons/1<sup>st</sup> calendar quarter, 4.032 million gallons/2<sup>nd</sup> calendar quarter, 4.032 million gallons/3<sup>rd</sup> calendar quarter, 4.032 million gallons/4<sup>th</sup> calendar quarter, and 16.128 million gallons/year. [District Rule 3.4/C-02-220]

For P-48-01(a) [Tank #9], the amount of diesel transferred shall not exceed 4.032 million gallons/1<sup>st</sup> calendar quarter, 4.032 million gallons/2<sup>nd</sup> calendar quarter, 4.032 million gallons/3<sup>rd</sup> calendar quarter, 4.032 million gallons/4<sup>th</sup> calendar quarter, and 16.128 million gallons/year. [District Rule 3.4/C-02-221]

For P-49-01(a1) [Tank #10], the amount of diesel transferred shall not exceed 4.032 million gallons/1<sup>st</sup> calendar quarter, 4.032 million gallons/2<sup>nd</sup> calendar quarter, 4.032 million gallons/3<sup>rd</sup> calendar quarter, 4.032 million gallons/4<sup>th</sup> calendar quarter, and 16.128 million gallons/year. [District Rule 3.4/C-04-09]

For P-50-01(a1) [Tank #11], the amount of diesel transferred shall not exceed 4.032 million gallons/1<sup>st</sup> calendar quarter, 4.032 million gallons/2<sup>nd</sup> calendar quarter, 4.032 million gallons/3<sup>rd</sup> calendar quarter, 4.032 million gallons/4<sup>th</sup> calendar quarter, and 16.128 million gallons/year. [District Rule 3.4/C-03-36]

For P-51-01(a) [Tank #12], the amount of diesel transferred shall not exceed 4.032 million gallons/1<sup>st</sup> calendar quarter, 4.032 million gallons/2<sup>nd</sup> calendar quarter, 4.032 million gallons/3<sup>rd</sup> calendar quarter, 4.032 million gallons/4<sup>th</sup> calendar quarter, and 16.128 million gallons/year. [District Rule 3.4/C-02-197]

For P-54-93(a4) [Tank #15], the amount of gasoline transferred shall not exceed 29.93 million gallons/1<sup>st</sup> calendar quarter, 30.27 million gallons/2<sup>nd</sup> calendar quarter, 30.60 million gallons/3<sup>rd</sup> calendar quarter, 30.60 million gallons/4<sup>th</sup> calendar quarter, and 121.40 million gallons/year. [District Rule 3.4/C-04-148]

For P-66-93(a1) [Tank #16], the amount of gasoline transferred shall not exceed 6.54 million gallons/1<sup>st</sup> calendar quarter, 6.62 million gallons/2<sup>nd</sup> calendar quarter, 6.69 million gallons/3<sup>rd</sup> calendar quarter, 6.69 million gallons/4<sup>th</sup> calendar quarter, and 26.17 million gallons/year. [District Rule 3.4/C-01-130 (revised)]

For P-55-93(a2) [Tank #17], the amount of foam release/oily water transferred shall not exceed 117,000 gallons/1<sup>st</sup> calendar quarter, 117,000 gallons/2<sup>nd</sup> calendar quarter, 117,000 gallons/3<sup>rd</sup> calendar quarter, 117,000 gallons/4<sup>th</sup> calendar quarter, and 468,000 gallons/year. [District Rule 3.4/C-02-128]

For P-45-94(a2) [Tank #18], the amount of gasoline transferred shall not exceed 15.00 million gallons/1<sup>st</sup> calendar quarter, 15.00 million gallons/2<sup>nd</sup> calendar quarter, 15.00 million gallons/3<sup>rd</sup> calendar quarter, 15.00 million gallons/4<sup>th</sup> calendar quarter, and 60.00 million gallons/year. [District Rule 3.4/C-06-65]

For P-69-93(a1) [Tank #19], the amount of ethanol transferred shall not exceed 5,573,610 gallons/1<sup>st</sup> calendar quarter, 5,635,539 gallons/2<sup>nd</sup> calendar quarter, 5,697,468 gallons/3<sup>rd</sup> calendar quarter, 5,697,468 gallons/4<sup>th</sup> calendar quarter, and 22,604,085 gallons/year. [District Rule 3.4/C-02-127]

For P-46-94(a1) [Tank #21], the amount of ethanol transferred shall not exceed 5,573,610 gallons/1<sup>st</sup> calendar quarter, 5,635,539 gallons/2<sup>nd</sup> calendar quarter, 5,697,468 gallons/3<sup>rd</sup> calendar quarter, 5,697,468 gallons/4<sup>th</sup> calendar quarter, and 22,604,085 gallons/year. [District Rule 3.4/C-02-126]

For P-65-95(a1) [Loading Racks], the amount of gasoline/ethanol transferred shall not exceed 140.0 million gallons/1<sup>st</sup> calendar quarter, 140.0 million gallons/2<sup>nd</sup> calendar quarter, 140.0 million gallons/3<sup>rd</sup> calendar quarter, 140.0 million gallons/4<sup>th</sup> calendar quarter, and 450.0 million gallons/year. [District Rule 3.4/C-04-147]

For P-65-95(a1) [Loading Racks], the amount of diesel transferred shall not exceed

24.192 million gallons/1<sup>st</sup> calendar quarter, 24.192 million gallons/2<sup>nd</sup> calendar quarter, 24.192 million gallons/3<sup>rd</sup> calendar quarter, 24.192 million gallons/4<sup>th</sup> calendar quarter, and 193.56 million gallons/year. [District Rule 3.4/C-04-147]

For P-93-02 [Ethanol Truck Off-Loading], the amount of ethanol transferred shall not exceed 123,858 gallons/day, 11,147,200 gallons/1<sup>st</sup> calendar quarter, 11,271,078 gallons/2<sup>nd</sup> calendar quarter, 11,394,936 gallons/3<sup>rd</sup> calendar quarter, 11,394,936 gallons/4<sup>th</sup> calendar quarter, and 45,208,170 gallons/year. [District Rule 3.4/C-02-129]

For P-39-03 [Ethanol Railcar Off-Loading], the amount of ethanol transferred shall not exceed 180,000 gallons/day, 11,300,000 gallons/1<sup>st</sup> calendar quarter, 11,300,000 gallons/2<sup>nd</sup> calendar quarter, 11,300,000 gallons/3<sup>rd</sup> calendar quarter, 11,300,000 gallons/4<sup>th</sup> calendar quarter, and 42,210,000 gallons/year. [District Rule 3.4/C-03-20 (revised)]

For P-1-90(t) [Waste-water Separator], the amount of water discharged to the sanitary sewer shall not exceed 3,500,000 gallons/year. This throughput limitation is estimated due to the fact that rain water is a contributor to this unit's throughput. [District Rule 3.4/C-88-36]

#### Work Practice and Operational Requirements for Specific Emission Units

For P-43-01(a) [Tank #1], P-44-01(a) [Tank #3], and P-45-01(a) [Tank #4], these storage tanks shall only be used to store gasoline with a true vapor pressure less than 11.0 psia under actual storage conditions, as determined by the test methods specified in Section 602 of District Rule 2.21. [District Rule 3.4/C-02-216, C-02-217, and C-02-218]

For P-43-01(a) [Tank #1], P-44-01(a) [Tank #3], P-45-01(a) [Tank #4], and P-66-93(a1) [Tank #16], solid sampling or gauging wells, and similar fixed projections through the floating roof such as an anti-rotational pole or column, shall be equipped with a pole wiper and a gasketed cover, seal, or lid which shall be in a closed position at all times except when the well is in use. The gap between the pole wiper and the guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirements, and in no case shall the gap exceed 1/8 inch, except when the well is in use for sampling. [District Rule 3.4/C-02-216, C-02-217, C-02-218, and C-01-130 (revised)]

For P-43-01(a) [Tank #1], P-44-01(a) [Tank #3], P-45-01(a) [Tank #4], and P-66-93(a1) [Tank #16], slotted sampling or gauging wells shall be equipped with float

and wiper seals designed to minimize the gap between the float and the well, and provide for no gap greater than 1/8 inch. The gap between the pole wiper and guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirements, and in no case shall the gap exceed 1/8 inch, except when the well is in use for sampling. [District Rule 3.4/C-02-216, C-02-217, C-02-218, and C-01-130 (revised)]

For P-44-01(a) [Tank #3], P-45-01(a) [Tank #4], P-54-93(a4) [Tank #15], P-66-93(a1) [Tank #16], P-55-93(a2) [Tank #17], P-69-93(a1) [Tank #19], and P-46-94(a1) [Tank #21], the primary seal shall be installed so that one end of the shoe extends into the stored liquid. [District Rule 3.4/C-02-217, C-02-218, C-04-148, C-01-130 (revised), C-02-128, C-02-127, and C-02-126]

For P-44-01(a) [Tank #3], P-45-01(a) [Tank #4], and P-66-93(a1) [Tank #16], all openings in the tank roof (except for the mechanical vacuum breaker) shall be provided with a projection below the liquid surface to prevent entrained organic vapor from escaping from the liquid contents of the tank. The tank shall have no ungasketed roof penetrations. [District Rule 3.4/C-02-217, C-02-218, and C-01-130 (revised)]

For P-54-93(a4) [Tank #15] and P-66-93(a1) [Tank #16], the tank shall only be used to store gasoline with a Reid Vapor Pressure (RVP) less than or equal to the values listed in Table 12, as determined by the test methods specified in Section 600 of District Rule 2.21. [District Rule 3.4/C-04-148 and C-01-130 (revised)]

Table 12. RVP Limitations

	April 1 - September 30	October 1 - March 31
RVP	7 psia	12 psia

For P-45-94(a2) [Tank #18], the tank shall only be used to store gasoline with a Reid Vapor Pressure (RVP) less than or equal to the values listed in Table 13, as determined by the test methods specified in Section 600 of District Rule 2.21. [District Rule 3.4/C-06-65]

Table 13. RVP Limitations

	April 1 - September 30	October 1 - March 31
RVP	7 psia	13 psia

For P-54-93(a4) [Tank #15], the two float wells shall each be equipped with a

projection below the liquid surface to prevent entrained organic vapor from escaping from the liquid contents of the tank and shall each be equipped with a gasket and a bolted cover. [District Rule 3.4/C-04-148]

For P-54-93(a4) [Tank #15], the six columns shall each be equipped with a pole wiper and a gasketed cover. The gap between the pole wiper and the column shall be added to the gaps measured to determine compliance with the secondary seal requirements, and in no case shall the gap exceed 1/8 inch, except when the well is in use for sampling. [District Rule 3.4/C-04-148]

For P-54-93(a4) [Tank #15], the slotted gauging well shall be equipped with a float, sleeve, and wiper seals designed to minimize the gap between the float and the well, and provide for no gap greater than 1/8 inch. The gap between the pole wiper and the guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirements, and in no case shall the gap exceed 1/8 inch, except when the well is in use for sampling. [District Rule 3.4/C-04-148]

For P-54-93(a4) [Tank #15] and P-66-93(a1) [Tank #16], the tank shall have vapor seal boots (or equivalent) on the adjustable roof legs. [District Rule 3.4/C-04-148 and C-01-130 (revised)]

For P-69-93(a1) [Tank #19] and P-46-94(a1) [Tank #21], the tank shall only be used to store denatured ethanol. [District Rule 3.4/C-02-127 and C-02-126]

For P-69-93(a1) [Tank #19] and P-46-94(a1) [Tank #21], fixed roof support columns and wells shall be equipped with a sliding gasketed cover or with a flexible fabric sleeve. [District Rule 3.4/C-02-127 and C-02-126]

For P-55-93(a2) [Tank #17], the tank shall only be used to store foam release/oily water after an emergency event. The tank shall only be used for a maximum of 30 days in any one quarter. [District Rule 3.4/C-02-128]

#### Monitoring and Testing Requirements for Specific Emission Units

For P-54-93(a4) [Tank #15], P-66-93(a1) [Tank #16], and P-45-94(a2) [Tank #18], an all level sample shall be taken at the beginning of each calendar quarter and upon request by the District. Samples shall be analyzed to determine the RVP. [District Rule 3.4/C-04-148, C-01-130 (revised), and C-06-65]

For P-54-93(a4) [Tank #15] and P-66-93(a1) [Tank #16], the Permit Holder shall

conduct actual gap measurements of the primary seal and secondary seal at least once every 60 months. [District Rule 3.4/C-04-148 and C-01-130 (revised)]

### **Rule 3.8 - Federal Operating Permits**

#### **Rule Description**

This rule implements the requirements of Title V of the Federal Clean Air Act as amended in 1990 (CAA) for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants. The version of the rule used in this evaluation was adopted on April 11, 2001 and is part of the current California SIP.

#### **Compliance Status**

The source has submitted a timely and complete Title V renewal application.

#### **Permit Conditions**

##### **Right of Entry**

The permit shall require that the source allow the entry of the District, ARB, or U.S. EPA officials for the purpose of inspection and sampling, including:

- a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
- b. Inspection and duplication of records required by the permit to operate; and
- c. Source sampling or other monitoring activities. [District Rule 3.8, §302.10]

##### **Compliance with Permit Conditions**

The Permit Holder shall comply with all Title V permit conditions. [District Rule 3.8, §302.11a]

The permit does not convey property rights or exclusive privilege of any sort. [District Rule 3.8, §302.11b]

Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [District Rule 3.8, §302.11c]

The Permit Holder shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition. [District Rule 3.8, §302.11d]

A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [District Rule 3.8, §302.11e]

Within a reasonable time period, the Permit Holder shall furnish any information requested by the APCO, in writing, for the purpose of determining:

- a. Compliance with the permit; or
- b. Whether or not cause exists for a permit or enforcement action. [District Rule 3.8, §302.11f]

### **Emergency Provisions**

Within two weeks of an emergency event, the Permit Holder shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:

- (i) An emergency occurred;
- (ii) The Permit Holder can identify the cause(s) of the emergency;
- (iii) The facility was being properly operated at the time of the emergency;
- (iv) All steps were taken to minimize the emissions resulting from the emergency; and
- (v) Within two working days of the emergency event, the Permit Holder provided the District with a description of the emergency and any mitigating or corrective actions taken; and

In any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12]

### **Severability**

If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. [District Rule 3.8, §302.13]

### **Compliance Certification**

The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every 12 months unless required more frequently by an applicable requirement. [District Rule 3.8, §302.14a]

The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of District Rule 3.8. [District Rule 3.8, §302.14b]

The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [District Rule 3.8, §302.14c]

The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal Clean Air Act. [District Rule 3.8, §302.14d]

### **Permit Life**

The Title V permit shall expire five years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [District Rule 3.8, §302.15]

### **Payment of Fees**

The Permit Holder shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [District Rule 3.8, §302.16]

### **Permit Revision Exemption**

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit. [District Rule 3.8 §302.22]

### **Application Requirements**

The Permit Holder shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. [District Rule 3.8, §402.2]

The Permit Holder shall submit a standard District application for each emission unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the Permit Holder shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [District Rule 3.8, §402.3]

The Permit Holder shall submit a standard District application for each emission unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the Permit Holder shall include the following:

- a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
- b. Proposed permit terms and conditions; and
- c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [District Rule 3.8, §402.4]

### **Permit Reopening for Cause**

Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:

- a. The need to correct a material mistake or inaccurate statement;
- b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
- c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is 3 years or greater, no later than 18 months after the promulgation of such requirement (where less than 3 years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
- d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [District Rule 3.8, §413.1]

### **Record-keeping**

The Permit Holder shall record maintenance of all monitoring and support

information required by any applicable federal requirement, including:

- (i) Date, place, and time of sampling;
- (ii) Operating conditions at the time of sampling;
- (iii) Date, place, and method of analysis; and
- (iv) Results of the analysis. [District Rule 3.8, §302.6a]

The Permit Holder shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application. [District Rule 3.8, §302.6b]

### **Reporting Requirements**

Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection. [District Rule 3.8, §302.7a]

A monitoring report shall be submitted at least every six months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7. a of District Rule 3.8. [District Rule 3.8, §302.7b]

All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [District Rule 3.8, §302.7c]

Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [District Rule 3.8, §302.7e]

## **40 CFR Part 60 Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids**

### **Rule Description**

This subpart provides performance standards for petroleum liquid storage vessels that commenced construction or modification after June 11, 1973 and prior to May 19, 1978.

### **Compliance Status**

Per Section 60.110(c)(1) and 60.110(c)(2), the provisions of this subpart do not apply to the source because the source does not have any petroleum liquid storage tanks that: (a) have a capacity greater than 40,000 gallons but not exceeding 65,000 gallons, and commenced construction or modification after March 8, 1974 and prior to May 19, 1978; or (b) have a capacity greater than 65,000 gallons, and commenced construction or modification after June 11, 1973 and prior to May 19, 1978.

### **Permit Conditions**

No permit conditions from this subpart are required.

### **40 CFR Part 60 Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids**

#### **Rule Description**

This subpart provides performance standards for petroleum liquid storage vessels that commenced construction or modification after May 18, 1978 and prior to July 23, 1984.

#### **Compliance Status**

Per Section 60.110a(a), the subpart applies to two (2) emission units at the stationary source - P-44-01(a) [Tank #3] and P-45-01(a) [Tank #4] - since both tanks have a storage capacity greater than 40,000 gallons and both tanks were constructed or modified after May 18, 1978 and prior to July 23, 1984. The source is currently in compliance with the subpart.

### **Permit Conditions**

#### **Work Practice and Operational Requirements**

For P-44-01(a) [Tank #3] and P-45-01(a) [Tank #4], the Permit Holder of each storage vessel which contains a petroleum liquid which, as stored, has a true vapor pressure equal to or greater than 10.3 kPa (1.5 psia) but not greater than 76.6 kPa (11.1 psia) shall equip the storage vessel with a fixed roof with an internal floating type cover equipped with a continuous closure device between the tank wall and the cover edge. The cover is to be floating at all times, (i.e., off the leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the cover is resting on the leg

supports shall be continuous and shall be accomplished as rapidly as possible. Each opening in the cover except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface. Each opening in the cover except for automatic bleeder vents, rim space vents, stub drains and leg sleeves is to be equipped with a cover, seal, or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the cover is floating except when the cover is being floated off or is being landed on the leg supports. Rim vents are to be set to open only when the cover is being floated off the leg supports or at the manufacturer's recommended setting. [40 CFR 60.112a(a)(2)]

#### Record-keeping Requirements

For P-44-01(a) [Tank #3] and P-45-01(a) [Tank #4], the Permit Holder shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period. [40 CFR 60.115a(a)]

#### **40 CFR Part 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)**

##### **Rule Description**

This subpart provides performance standards for volatile organic liquid (including petroleum liquid) storage vessels that commenced construction or modification after July 23, 1984.

##### **Compliance Status**

Per Section 60.110b(a), the subpart applies to one (1) emission unit at the stationary source - P-43-01(a) [Tank #1] - since the tank has a storage capacity greater than 75 cubic meters (19,813 gallons) and the tank was constructed or modified after July 23, 1984. The source is currently in compliance with the subpart.

##### **Permit Conditions**

##### **Work Practice and Operational Requirements**

For P-43-01(a) [Tank #1], the internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that

has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [40 CFR 60.112b(a)(1)(i)]

For P-43-01(a) [Tank #1], the internal floating roof shall be equipped with the following closure device between the wall of the storage vessel and the edge of the internal floating roof: Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. [40 CFR 60.112b(a)(1)(ii)(B)]

For P-43-01(a) [Tank #1], each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [40 CFR 60.112b(a)(1)(iii)]

For P-43-01(a) [Tank #1], each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR 60.112b(a)(1)(iv)]

For P-43-01(a) [Tank #1], automatic bleeder vents shall be equipped with a gasket and 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. [40 CFR 60.112b(a)(1)(v)]

For P-43-01(a) [Tank #1], rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [40 CFR 60.112b(a)(1)(vi)]

For P-43-01(a) [Tank #1], each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR 60.112b(a)(1)(vii)]

For P-43-01(a) [Tank #1], each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve

seal or a gasketed sliding cover. [40 CFR 60.112b(a)(1)(viii)]

For P-43-01(a) [Tank #1], each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)]

### Monitoring and Testing Requirements

For P-43-01(a) [Tank #1], the Permit Holder must comply with one of the following two options:

- (i) Visually inspect the vessel as specified in the following paragraph at least every 5 years: Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permit Holder shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL; or
- (ii) Visually inspect the vessel as specified in the following paragraph: visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permit Holder shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 60.113b(a)(1-4)]

### Record-keeping Requirements

For P-43-01(a) [Tank #1], the Permit Holder shall notify the Administrator in writing

at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs (a)(1) and (a)(4) of this section to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph (a)(4) of this section is not planned and the Permit Holder could not have known about the inspection 30 days in advance or refilling the tank, the Permit Holder shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling. [40 CFR 60.113b(a)(5)]

For P-43-01(a) [Tank #1], the Permit Holder shall keep records and furnish reports as required by paragraphs (a), (b), or (c) of this section depending upon the control equipment installed to meet the requirements of §60.112b. The Permit Holder shall keep copies of all reports and records required by this section, except for the record required by (c)(1), for at least 5 years. The record required by (c)(1) will be kept for the life of the control equipment. [40 CFR 60.115b]

For P-43-01(a) [Tank #1], the Permit Holder shall keep a record of each inspection performed as required by §60.113b (a)(1), (a)(2), (a)(3), and (a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). [40 CFR 60.115b(a)(2)]

For P-43-01(a) [Tank #1], if any of the conditions described in §60.113b(a)(2) are detected during the annual visual inspection required by §60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a)(3)]

For P-43-01(a) [Tank #1], after each inspection required by §60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in §60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of §60.112b(a)(1) or §60.113b(a)(3) and list each repair made. [40 CFR 60.115b(a)(4)]

For P-43-01(a) [Tank #1], the Permit Holder shall keep copies of all records required by this section, except for the record required by §60.116b(b), for at least 2 years. The record required by §60.116b(b) will be kept for the life of the source. [40 CFR 60.116b(a)]

For P-43-01(a) [Tank #1], the Permit Holder of each storage vessel as specified in §60.110b(a) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR 60.116b(b)]

#### **40 CFR Part 60 Subpart XX - Standards of Performance for Bulk Gasoline Terminals**

##### **Rule Description**

This subpart provides performance standards for loading racks at bulk gasoline terminals that commenced construction or modification after December 17, 1980.

##### **Compliance Status**

Per Section 60.500(a) & (b), the provisions of this subpart do not apply to the source because the source does not have any loading racks that commenced construction or modification after December 17, 1980. The source's East and West loading racks were both constructed in 1957.

##### **Permit Conditions**

No permit conditions from this subpart are required.

#### **40 CFR Part 64 - Compliance Assurance Monitoring**

##### **Rule Description**

This subpart provides guidelines for developing a compliance assurance monitoring (CAM) plan. The CAM plan requires that a stationary source monitor the appropriate parameters of a process or its control equipment, and/or measure the process' actual emissions, so as to ensure emission compliance on an on-going basis.

The CAM requirements apply to any pollutant specific emission unit at a major source that is required to obtain a Part 70 permit and which satisfies all of the following:

- a. The unit is subject to an emission limit or standard for an applicable regulated air pollutant;
- b. The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- c. The unit's pre-control device potential to emit of an applicable regulated pollutant is greater than or equal to that pollutant's major source threshold.

### **Compliance Status**

All emission units at the source are exempt from the requirements of this federal subpart, since none of these emission units have a pre-control device potential to emit greater than or equal to any of the major source thresholds. Per Section 64.1, seals, lids, roofs, and other control measures that prevent the release of pollutants do not meet the definition of a control device.

### **Permit Condition**

No permit conditions from this subpart are required.