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	PROCESSED BY Jon Uhl	CHECKED BY

PERMIT TO CONSTRUCT/OPERATE (PC-PO)
ALTERATION – Add Geodesic Dome

COMPANY NAME, LOCATION ADDRESS:

ConocoPhillips Company, SCAQMD ID # 800363
 1660 W. Anaheim Street
 Wilmington, CA 90748-0758

EQUIPMENT DESCRIPTION:

Changes from the Permit to Operate (AN 326306): Additions to the equipment description are underlined and bolded. New conditions are underlined and bolded. Deletions to the equipment description and conditions are noted in strikeouts.

Section D of ConocoPhillips - Wilmington Facility Permit, ID# 800363

Note: Add to Section D, Process 13, System 8

Remove from Section D, Process 13, System 3

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 13 : STORAGE TANKS					P13.1, P13.2
System 8: DOME COVERED EXTERNAL FLOATING ROOF TANKS					S13.8
STORAGE TANK, <u>DOMED</u> EXTERNAL FLOATING ROOF, NO. 6, 42000 BBL, DIAMETER: 85 FT, HEIGHT: 48 FT WITH A/N: 326306 501735 Permit to Construct Issued: tbd <u>DOME COVER, GEODESIC</u> FLOATING ROOF, DOUBLE DECK, WELDED SHELL PRIMARY SEAL, CATEGORY A, METALLIC SHOE SECONDARY SEAL, CATEGORY A, WIPER TYPE <u>GUIDEPOLE, GASKETED</u> <u>SLIDING COVER, WITH</u> <u>WIPER, UNSLOTTED</u>	D549			BENZENE: (10) [40CFR 61 SUBPART FF_01, 12-4-2003]; HAP: (10) [40CFR 63 SUBPART CC, #3A, 6-23-2003]	B22.2, C1.50, H23.9, <u>K67.11,</u> <u>K171.x</u>

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CONDITIONS:

The following permit conditions shall apply to the storage tank in order to comply with all applicable District, State, and Federal standards. Additions and deletions to the conditions are noted in underlines and strikeouts, respectively.

PROCESS CONDITIONS

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

Contaminant	Rule	Rule/Subpart
VOC	District Rule	463

[**RULE 463, 5-6-2005**]

[Processes subject to this condition: 13]

P13.2 All devices under this process are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
HAPs	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, 18]

SYSTEM CONDITIONS

S13.8 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	1178
VOC	District Rule	1149

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

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[Systems subject to this condition: Process 13, System 3, 8]

DEVICE CONDITIONS

B. Material/Fuel Type Limits

B22.2 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: D549]

C. Throughput or Operating Parameter Limits

C1.50 The operator shall limit the throughput to no more than 730000 barrels in any one year.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]
 [Devices subject to this condition: D549]

H. Applicable Rules

H23.9 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR60, SUBPART	Kb
Benzene	40CFR61, SUBPART	FF

[40CFR 60 Subpart Kb, 10-15-2003; 40CFR 61 Subpart FF, 12-4-2003]
 [Devices subject to this condition: D546, D549, D555, D556, D602, D612, D630, D633]

K. Recordkeeping/Reporting

K67.11 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 stored and its time period.
- True vapor pressure, in psia at actual storage temperature, of each commodity stored.
- Hydrocarbon concentration measurements of the vapor space above the floating roof of the tank.
- Other records that are required to comply with the applicable requirements of Rule 463(d), 1149, 1178, and 40CFR63 Subpart CC.

[RULE 1149, 7-14-1995; RULE 1149, 5-2-2008; RULE 1178, 4-7-2006; RULE 1301, 12-7-1995; RULE, 463, 5-6-2005; 40CFR 63 Subpart CC, 6-23-2003]

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[Devices subject to this condition: **D549**]

K171.x The operator shall provide to the District the following items:

Final drawings and/or specifications of the geodesic dome cover, slotted/unslotted guidepole, wiper and other tank appurtenances upgrades to be installed/constructed shall be submitted to the district within 60 days after construction.

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

[Devices subject to this condition: **D549**]

COMPLIANCE WITH PERMIT CONDITIONS - RECORDS:

Storage Tank #6, [D549]

Condition S13.8: The Rule 463/1178 tank inspection report dated 9/15/2009 is included in Attachment 2. Tank #6 is in compliance.

Condition B22.2: There is no restriction on the products stored in this tank.

Tank contents are limited to a TVP less than 11 psia. ConocoPhillips submitted a summary of RVP records for 2004 through 2009 (53 samples). The maximum RVP was 5.4 psia. Since the temperature of Tank 6 is less than 100 °F (tank inspection report dated 9/15/2009 shows 78 °F), the TVP is less than the RVP. RVP summary is included in Attachment 2. Complies.

Condition C1.50: The throughput limit is 730,000 bbl in any year. ConocoPhillips submitted throughput records showing 504,709 bbl for 2008 and 272,723 bbl for YTD 2009. Throughput records are included in Attachment 2. Complies.

Condition H23.9: The tank inspection and reporting requirements for 40CFR Part 60 Subpart Kb, 40CFR Part 61 Subpart FF and 40CFR Part 63 Subpart CC are met by the Rule 463/1178 tank inspection report dated 9/15/2009 (included in Attachment 2).

REVIEW OF COMPLIANCE DATABASE:

On 10/2/2009, the AQMD Compliance Database shows two (2) outstanding Notices of Violation since January 1, 2007 (see Attachment 4). NOV P26969 – primary seal repair on Tank #6: seal was repaired and is in compliance; see email from District inspector Gale Jones dated 10/7/09. The remaining NOV does not apply to this storage tank.

BACKGROUND:

ConocoPhillips operates this refinery in the city of Wilmington. The facility is a NOx and SOx RECLAIM facility. The Title V permit was issued July 1, 2009.

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Storage Tank #6, [D549]

Storage Tank No. 6 [D549] is an external floating roof tank used to store "recovered oil", which is oil recovered from the API wastewater separators, oil collected in the flare knock-out drums and other waste oil from the process units. Tank was built in 1979, with no later alterations.

On September 1, 2009, ConocoPhillips submitted A/N 501735 to add a geodesic dome by 12/31/2010, in accordance with their revised Rule 1178 compliance plan (A/N 457557).

Permitting History – Tank #6

A/N	Date	A/N Status	Permit	Permit Action
501735	(current)	20		Alteration — add geodesic dome for Rule 1178 compliance
326306	7/3/1997	31	Active F6708	Change of ownership from Unocal to Tosco
C16683	10/16/1980	31	Inactive M16500	Construct new external floating roof tank

FEE EVALUATION

Table 1 - Applications Submitted to AQMD

A/N	Date Submitted	Equipment	Device ID	Requested Action	Active P/O
501735	September 1, 2009	Storage Tank # 6 with External Floating Roof	D549	• Add dome	F6708 A/N 326306
501730	September 1, 2009	Title V/RECLAIM Permit Revision	n/a	• Minor revision to Title V permit	n/a

The fees paid for the applications are:

Table 2 – Application Fees Paid

A/N	Equipment	BCAT	Type	Status	Fee Schedule	Fees Required, \$	Fees Paid, \$
501735	Storage Tank #6	251904	50	20	C	3,244.91	3,244.91
	Expedited Processing Fee					1,622.46	1,622.46
501730	T5/RECLAIM Minor Permit Revision	555009	85	21		1,687.63	1,687.63

TANK SPECIFICATIONS

Table 3 lists the pre-modification and post-modification storage tank specifications; changes include:
Add geodesic dome



Table 3 – Storage Tank No. 6 (D549) Specifications

	External Floating Roof Tank Pre-Modification A/N 326306 (F6708)	Domed External Floating Roof Tank Post-Modification A/N 501735
Tank Dimensions		
Diameter, feet	85.	85.
Volume, gallons (barrels)	1,764,000 (42,000)	1,764,000 (42,000)
Throughput, barrels per year	730,000*	730,000*
Turnovers	17.4	17.4
Paint Characteristics		
Internal Shell Condition	Light Rust	Light Rust
Shell Color/Shade	Gray/Light	Gray/Light
Shell Condition	Good	Good
Tank Construction and Rim-Seal System		
Construction:	Welded	Welded
Primary Seal:	Mechanical Shoe	Mechanical Shoe
Secondary Seal:	Rim-mounted	Rim-mounted
Liquid Contents		
Mixture/Component	Recovered Oil, max vapor pressure: 11 psia	Recovered Oil, max vapor pressure: 11 psia
Roof Characteristics		
Type	Double Deck	Double Deck with Domed Roof
Deck Fittings/Status	<ul style="list-style-type: none"> • 1-Access Hatch (24-in Dia.)/Bolted Cover, Gasketed • 1-Gauge-Hatch/Sample Well (8-in Dia.)/Weighted Mech. Actuation, Gasketed • 15-Roof Leg (3-in Dia.)/Adjustable, Double Deck Roof • 1- Unslotted Guidepole/Well/Gasketed Sliding Cover, Wiper • 1-Vacuum Breaker (10 in Dia.)/ Weighted Mech. Actuation, Gasketed • 1-Automatic Gauge Float Well/Bolted Cover, Gasketed • 1-Roof Drain (3-in Dia.)/90% Closed 	<ul style="list-style-type: none"> • 1-Access Hatch (24-in Dia.)/Bolted Cover, Gasketed • 1-Gauge-Hatch/Sample Well (8-in Dia.)/Weighted Mech. Actuation, Gasketed • 15-Roof Leg (3-in Dia.)/Adjustable, Double Deck Roof • 1- Unslotted Guidepole/Well/Gasketed Sliding Cover, Wiper • 1-Vacuum Breaker (10 in Dia.)/ Weighted Mech. Actuation, Gasketed • 1-Automatic Gauge Float Well/Bolted Cover, Gasketed • 1-Roof Drain (3-in Dia.)/90% Closed
Other	• None	• None

* Throughput based on condition C1.50 limit of 730,000 bbl/year.

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EMISSIONS CALCULATIONS:

This application proposes to add an external geodesic dome roof to comply with Rule 1178. The change in VOC emissions due to the tank modification was calculated per Rule 1306(d)(2)(A) using the EPA TANKS 4.0 software package, and the storage tank specifications provided by the applicant. Adding the dome cover will reduce the estimated VOC emissions. Table 4 is a summary of the emission decrease:

Table 4 – Summary of VOC Emissions Decrease

A/N	Storage Tank #		VOC Losses for each tank				
			Rim Seal, lbs/year	Withdrawal, lbs/year	Roof Fitting, lbs/year	Total	
						lbs/year	lbs/day*
501735	6 (D549)	External floating roof tank emissions (Pre-Modification)	6,015.41	75.93	1,497.59	7,588.92	21.08
		Domed external floating roof tank emissions (Post-Modification)	1,148.22	75.93	881.88	2,106.03	5.85

* 30-day average

Since the modification of the storage tanks (addition of dome roof) is expected to decrease the VOC emission, a decrease in toxic health risk is also expected.

1. Pre-Modification Emissions from External Floating Roof based on:
 Tank throughput = 730,000 bbl/year, condition C1.50 limit
 TVP = 11 psia, Rule 463(d)(4) limit
 Tank specifications shown in Table 3
 w/o dome
2. Post-Modification Emissions from Domed External Floating Roof based on:
 Tank throughput = 730,000 bbl/year, condition C1.50 limit
 TVP = 11 psia, Rule 463(d)(4) limit
 Tank specifications shown in Table 3
 With external geodesic dome added

A copy of the TANKS 4.0 Emission Report is included in Attachment 3.

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RULES EVALUATION:

PART 1 STATE REGULATIONS

California Environmental Quality Act (CEQA)	
	These modifications are not a significant project.

PART 2 SCAQMD REGULATIONS

Rule 212	Standards for Approving Permits	November 14, 1997
	These modifications meet all the criteria in Rule 212 for permit approval. Rule 212 public notice is not required.	
212(a)	The modifications were designed so the tank can operate without emitting air contaminants in violation of Division 26 of the State Health and Safety Code or in violation of AQMD's rules and regulations.	
212(b)	Does not apply; this is an application for a Permit to Construct.	
212(c)(1)	The tank is not located within 1000 feet of a school.	
212(c)(2)	The emission increase does not exceed the daily maximum specified in subdivision (g) of this rule (30 lbs/day VOC).	
212(c)(3)	The tank does not have an increased cancer risk greater than, or equal to, one in a million (1×10^{-6}) during a lifetime of 70 years or pose a risk of nuisance.	

Rule 401	Visible Emissions	November 9, 2001
	Visible emissions are not expected under normal operation.	

Rule 402	Nuisance	May 7, 1976
	Nuisance complaints are not expected under normal operating conditions.	

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Rule 463	Organic Liquid Storage	May 6, 2005
	This rule applies to any above-ground tank with capacity 19,815 gallons or greater for storing organic liquids. This tank stores organic liquids with a true vapor pressure greater than 0.5 psia under actual storage conditions.	
463(c)(1)	The domed external floating roof tank is subject to Rule 463(c)(1). The Tank #6 has a double deck external floating roof. The roof has a mechanical shoe primary seal and a rim-mounted secondary seal. Roof openings project below the liquid surface and are kept covered except during maintenance/inspection. There is one pressure-vacuum valve which is set to 10% of the roof maximum working pressure. Roof drain is provided with 9/10 of total area coverage.	
	The domed external floating roof tank is subject to the requirements of Rule 463(d) - Other Performance Requirements:	
463(d)(1)	Tank capacity is greater than 19,815 gallons. Therefore, this paragraph does not apply.	
463(d)(2)	The external floating roof is designed to float on the organic liquid at all times (i.e., free of the roof leg supports) except when the tank is being completely emptied for cleaning, or repair.	
463(d)(3)	The external floating roof shall be refloated with water or equivalent method approved by the District whenever the tank is gas-freed or refilled by gasoline.	
463(d)(4)	The tank will not store organic liquids having a true vapor pressure of 11 psia or greater under actual storage conditions. The compliance records submitted show less than 11 psia.	
463(d)(5)	Replacement seals on the tank will only be chosen from the current list of seals approved by District.	
	Compliance with Rule 463 is expected with proper recordkeeping and inspections. The Rule 463 inspection and maintenance plan will be updated to reflect installation of the dome roof cover.	

Rule 1149	Storage Tank Cleaning and Degassing	May 2, 2008
	The tank will continue to be subject to the tank cleaning and degassing requirements of this rule. Compliance is expected.	

Rule 1178	Further Reduction of VOC Emissions from Storage Tanks at Petroleum Facilities
1178(b)	Applicability. This rule applies to all aboveground storage tanks with capacity greater than 19,815 gallons, and used to store organic liquids with true vapor pressure greater than 0.1 psi, and located at any petroleum facility emitting more than 20 tons per year of VOC in any emission inventory year starting with emission inventory year 2000. This tank stores organic liquids with a TVP greater than 0.1 psia and is therefore subject to Rule 1178.



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Rule 1178	Further Reduction of VOC Emissions from Storage Tanks at Petroleum Facilities	
1178(d)(1)	<p>External Floating Roof Tanks.</p> <p>For tanks containing organic liquids with a true vapor pressure less than 3 psia for the emission inventory year 2000, each tank shall be equipped with the fittings specified in this paragraph.</p> <p>This tank stores organic liquids with a TVP which may exceed 3 psia. The tank is subject to the fittings requirements of Rule 1178(d)(1) for a domed external floating roof tank.</p>	
1178(d)(2)	<p>Domed External Floating Roof Tanks. For this Phase II tank at a facility choosing to comply with Rule 1178(d)(2)(A)(iv), containing organic liquids greater than 3 psia, the dome roof is required to be installed by 12/31/2010. See the revised Rule 1178 compliance plan (AN 457557).</p> <p>Rule 1178(j)(7) provides an exemption from the doming requirements of paragraph (d)(2)(A) and (d)(2)(B) if the tank is permitted to contain more than 97% by volume crude oil and complies with all the remaining applicable requirements of this rule.</p>	
Specifications:	Tank #6	
	[D549]	
Contains more than 97%vol crude oil?	No	
Maximum vapor pressure: psia	11.0	
1178(d)(2)(D)	The external floating roof tank has been equipped with all roof openings in accordance with the specifications listed in subparagraph (d)(1)(A):	
(i) Equip each access hatch and gauge float well 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.	Yes	
(ii) Equip each gauge hatch/sample well with a cover that is gasketed. The cover shall be closed at all times, with no visible gaps, except when the hatch or well must be opened for access.	Yes	
(iii) Gasket or cover each adjustable roof leg with a VOC impervious sock at all times when the roof is floating.	Yes	

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Rule 1178	Further Reduction of VOC Emissions from Storage Tanks at Petroleum Facilities	
Specifications:	Tank #6 [D549]	
(iv) Gasket each rim vent. Rim vents shall be closed at all times, with no visible gaps, when the roof is floating; and shall be set to open only when the roof is being floated off the roof leg supports or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting	N/A	
(v) Gasket each vacuum breaker. Vacuum breakers shall be closed at all times, with no visible gaps, when the roof is floating; and shall be set to open only when the roof is being floated off or is being landed on the roof leg supports.	Yes	
(vi) Equip each open floating roof drain with a slotted membrane fabric cover or other device with an equivalent control efficiency that covers at least 90 percent of the area of the opening.	Yes	
(vii) Equip each unslotted guidepole well with a gasketed sliding cover and a flexible fabric sleeve or wiper	Yes	
(viii) Equip each unslotted guidepole with a gasketed cover at the end of the pole. The cover shall be closed at all times, with no visible gaps, except when gauging or sampling.	Yes	
(ix) Equip each slotted guidepole with a gasketed cover, a pole wiper and a pole sleeve. The pole sleeve shall be extended into the stored liquid	N/A	
(x) Equip each slotted guidepole having a pole float with a gasketed cover, a pole wiper, and a pole float wiper. The wiper or seal of the pole float shall be at or above the height of the pole wiper.	N/A	



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Rule 1178 Further Reduction of VOC Emissions from Storage Tanks at Petroleum Facilities	
Specifications:	Tank #6 [D549]
(xi) Cover each slotted guidepole opening with a gasketed cover at all times, with no visible gaps, except when the cover must be opened for access.	N/A
(xii) Maintain the pole float in a condition such that it floats within the guidepole at all times except when it must be removed for sampling or when the tank is empty.	N/A
(xiii) Except for vacuum breakers and rim vents, ensure that each opening in the external floating roof shall provide a projection below the liquid surface.	Yes
(xiv) Except for vacuum breakers, rim vents, roof drains, and leg sleeves, equip all other openings in the roof with a gasketed cover or seal which is closed at all times, with no visible gaps, except when the cover or seal must be opened for access.	Yes
1178(d)(2)(E)	The external floating roof tank has been equipped with seals in accordance with the specifications listed in subparagraph (d)(1)(B):
Specifications:	Tank #6 [D549]
(i) The primary seal shall be a mechanical shoe or liquid mounted.	Yes mechanical shoe
(ii) The secondary seal shall be rim mounted and shall not be attached to the primary seal.	Yes
1178(d)(2)(F)	The concentration of organic vapor in the vapor space above the external floating roof shall not exceed 30% LEL. Dome not yet installed.
	Compliance with Rule 1178 is expected.

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REG XIII **New Source Review (NSR)** **December 6, 2002**
Application Deemed Complete: 2009

Tank #6 was constructed in 1979 and the NSR balance was entered as 31 lb/day VOC when the permit to construct was issued. There has been no change in the NSR balance since the original permit to construct. This application proposes to add an external geodesic dome roof to comply with Rule 1178.

The change in VOC emissions due to the tank modification was calculated per Rule 1306(d)(2)(A) using the EPA TANKS 4.0 software package. Adding the dome cover will reduce the estimated VOC emissions to 6 lb/day. Emission calculations are included as Attachment 3.

Rule 1303(a): The requirements of Rules 1303(a) and 1303(b) do not apply to this equipment
BACT & modification since there is no emission increase [calculated per the Rule 1306(d)(2)(A)
Rule 1303(b) method] with the addition of the dome roof cover. Note that this tank will be equipped
with current BACT: domed roof cover and compliance with Rule 1178.

No VOC offsets are required.

	NSR VOC Emissions	
	Pre-mod	Post-mod
	A/N 326306	A/N 501735
Tank #6	31 lb/day	6 lb/day

Rule 1401 **New Source Review of Toxic** **June 5, 2009**
Air Contaminants **Application Deemed Complete: October 1, 2009**

This application proposes to add an external geodesic dome roof cover to comply with Rule 1178. MICR, cancer burden and chronic HI are calculated per Rule 1401(f)(3)(A) and acute HI is calculated per Rule 1401(f)(4). For Tank #6 (D549), the permit condition C1.50 (tank throughput limited to 730,000 bbl/year) directly limits the annual emissions. The installation of the dome roof cover will decrease TAC emissions. Therefore, there is no increase in the cancer burden, maximum individual cancer risk (MICR), or acute (HIA) or chronic (HIC) health indices at any receptor location due to the tank modification.

This tank modification is exempt from the requirements of Rule 1401(d) in accordance with Rule 1401(g)(1)(B): Exemptions-Modification with No Increase in Risk.

Federal NSR for toxics does not apply since this is not considered a reconstruction per 40CFR63, Subpart A, §63.2.

REG XX **RECLAIM** **May 6, 2005**

ConocoPhillips-Wilmington has been designated as a RECLAIM facility. This tank does not emit NO_x or SO_x; therefore, RECLAIM requirements do not apply.



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REG XXX	Title V	March 16, 2001
	ConocoPhillips-Wilmington was issued a Title V permit effective July 1, 2009. This is a minor permit revision as defined in Rule 3000(b)(12).	
	Rule 3000 (b)(12)(A)(i)	This revision 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.
	(b)(12)(A)(ii)	This revision does not violate a regulatory requirement.
	(b)(12)(A)(iii)	This revision does not require any significant change in monitoring terms or conditions in the permit.
	(b)(12)(A)(iv)	This revision does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit.
	(b)(12)(A)(v)	This revision does not result in an emission increase of RECLAIM pollutants.
	(b)(12)(A)(vi)	This revision does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review or a hazardous air pollutant.
	(b)(12)(A)(vii)	This revision does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement.
	(b)(12)(A)(viii)	This revision 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.
	(b)(12)(A)(ix)	This revision 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.
	A minor permit revision is subject to a 45-day EPA review , Rule 3003(j) and not subject to public participation requirements, Rule 3006(b).	

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PART 3 FEDERAL REGULATIONS

40CFR Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commences after July 23, 1984
§60.110b(a)	Applicability – This tank will continue to be subject to Subpart Kb in order to meet the requirements of Subpart FF by §61.351(a)(2) – Alternative standards for tanks: An external floating roof meeting the requirements of 40CFR Part 60 Subpart Kb.
§60.110b(a)(2)	This tank has a double-deck roof which rests on the liquid surface.
§60.110b(a)(2)(i)	This tank has two seals, one above the other. The primary seal is a mechanical shoe seal, which completely covers the annular space between the roof and the tank wall. The secondary seal is rim-mounted and completely covers the annular space between the roof and the tank wall.
§60.110b(a)(2)(ii)	The roof fitting requirements are met by the SCAQMD Rule 1178 requirements.
§60.110b(a)(2)(iii)	The external roof is designed to float on the product.
§60.113b & §60.115	Tank inspection, reporting & recordkeeping are met by SCAQMD Rule 463/1178 requirements.
	This tank complies with the tank design/control requirements of this regulation. The tank inspection program will be updated to reflect the installation of the dome roof. This tank will continue to be subject to Subpart Kb per Condition H23.9.

40CFR Part 61 Subpart FF	National Emission Standard for Benzene Waste Operations
	Per §61.340, ConocoPhillips-Wilmington is subject to this regulation. This tank stores “recovered oil” which is oil recovered from the API wastewater separators, oil collected in the flare knock-out drums and other waste oil from the process units. This storage tank meets the Subpart FF definition for a tank given in §61.341: a stationary waste management unit that is designed to contain an accumulation of waste prior to being recycled.
	The tank meets the requirements of Subpart FF by §61.351(a)(2) – Alternative standards for tanks: An external floating roof meeting the requirements of 40CFR Part 60 Subpart Kb.



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING & COMPLIANCE DIVISION
APPLICATION PROCESSING AND CALCULATIONS

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40CFR Part 63 Subpart CC	National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries
§60.640(a)	Applicability – This storage tank is located at a site that is a major source as defined in section 112(a) of the Clean Air Act [This refinery emits 25 tons or more of hazardous air pollutants (HAPs)]. This tank emits one or more HAPs listed in table 1 of this subpart.
§60.640(c)(2)	This storage tank is part of the wastewater treatment operations associated with petroleum refining process units.
§60.643	This storage tank is a Group 1 storage vessel at an existing source, with: <ul style="list-style-type: none"> • Tank capacity $\geq 177 \text{ m}^3$ (46,758 gal) • Maximum TVP $\geq 10.4 \text{ kPa}$ (1.5 psia) • Annual average TVP $\geq 8.3 \text{ kPa}$ (1.2 psia) • Annual average total HAPs liquid concentration $\geq 4\% \text{wt}$ <p>The facility has indicated that the tank contents exceed 4%wt HAPs, and this tank will continue to be designated as a Group 1 tank.</p>
§60.640(n)(1)	Per Condition H23.9, this Group 1 tank is subject to 40CFR60 Subpart Kb. A Group 1 tank that is part of an existing source and also subject to 40CFR60 Subpart Kb is required to comply only with the requirements of Subpart Kb.

CONCLUSION

Based on the above evaluation, it recommended that the following be issued:

A/N	Recommendation
501735	Issue Permit to Construct/Operate (PC-PO) with conditions listed in the Conditions Section
501730	Approve Plan (Title V Minor Permit Revision)

List of Attachments

1. ConocoPhillips – Wilmington Facility Permit (ID 800363), Sections D
2. Tank No. 6 Compliance Information submitted by ConocoPhillips
 - Rule 1178 tank inspection report (9/15/2009)
 - Vapor pressure measurements (2004-2009)
 - Tank throughput (2008 & 2009)
3. Tanks 4.0 Emission Calculations
4. AQMD Compliance Database (10/2/2009)