



OCT 21 2015

Ms. Helen Theoret  
Equilon Enterprises LLC  
2555 13<sup>th</sup> Ave SW  
Seattle, WA 98134

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # N-758  
Project # N-1151912**

Dear Ms. Theoret:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The proposed project is to receive and store biodiesel, and install mixers in the tanks to blend organic liquids.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authorities to Construct with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

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Rule 4624      Transfer of Organic Liquid (12/20/07)  
 California Health and Safety Code 41700 (Public Nuisance)  
 California Health and Safety Code 42301.6 (School Notice)  
 Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)  
 California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

**III. Project Location**

This facility is located at 3515 Navy Dr, Stockton, California. There is no K-12 school within 1,000 feet of this location. Therefore, school notice, under the California Health and Safety Code 42301.6, is not required for this project.

**IV. Process Description**

This facility is a bulk distribution terminal. Gasoline, diesel, and denatured ethanol are delivered to the facility by pipeline and trucks for bulk storage. As required by customer demand, organic liquids are loaded from the bulk storage tanks into tanker trucks for delivery to various retail gasoline stations and other gasoline fueling facilities.

**V. Equipment Listing**

Pre-Project Equipment Description

Permit #	Equipment Description
N-758-3-3	ONE 630,000 GALLON ABOVEGROUND TANK (TANK #14) STORING GASOLINE, DENATURED ETHANOL, OR DIESEL SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13) DURING GASOLINE AND DENATURED ETHANOL STORAGE
N-758-7-3	ONE 399,000 GALLON ABOVEGROUND TANK (TANK #17) STORING GASOLINE, DENATURED ETHANOL, OR DIESEL SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13) DURING GASOLINE AND DENATURED ETHANOL STORAGE
N-758-11-2	BULK OFF-LOADING OPERATION UTILIZED FOR GASOLINE OR ETHANOL OFF-LOADING (RECEIVING) LOCATED AT TRUCK LOADING LANE #3.
N-758-14-4	ONE 689,136 GALLON (16,408 BBL) ABOVEGROUND WELDED EXTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL/DIESEL STORAGE TANK (TANK #18) WITH A MECHANICAL SHOE TYPE PRIMARY SEAL AND A SECONDARY WIPER SEAL

**Post-Project Equipment Description**

Permit #	Equipment Description
N-758-3-4	ONE 630,000 GALLON ABOVEGROUND TANK <u>WITH MIXER</u> (TANK #14) STORING GASOLINE, DENATURED ETHANOL, OR DIESEL/ <u>BIODIESEL</u> SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13) DURING GASOLINE AND DENATURED ETHANOL STORAGE
N-758-7-4	ONE 399,000 GALLON ABOVEGROUND TANK <u>WITH MIXER</u> (TANK #17) STORING GASOLINE, DENATURED ETHANOL, OR DIESEL/ <u>BIODIESEL</u> SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13) DURING GASOLINE AND DENATURED ETHANOL STORAGE
N-758-11-3	BULK OFF-LOADING OPERATION UTILIZED FOR GASOLINE OR ETHANOL <u>OR DIESEL/BIODIESEL</u> OFF-LOADING (RECEIVING) LOCATED AT TRUCK LOADING LANE #3.
N-758-14-5	ONE 689,136 GALLON (16,408 BBL) ABOVEGROUND WELDED EXTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL/ <u>DIESEL/BIODIESEL</u> STORAGE TANK (TANK #18) <u>WITH A MIXER</u> , A MECHANICAL SHOE TYPE PRIMARY SEAL AND A SECONDARY WIPER SEAL

**VI. Emission Control Technology Evaluation**

The applicant is not proposing any changes to the existing emission control technique. Therefore, emission control technology evaluation is not required for the permit units under this project.

**VII. General Calculations**

**A. Assumptions**

- Assumptions will be stated, as they are made.

**B. Emission Factors**

**1. Pre-Project Emission Factors (EF1)**

N-758-3-3, '-7-3, '-11-2 and '-14-4

The potential emissions (pounds/day, pounds/year) are available from previous permitting actions. Therefore, EF1 is not listed here.

2. Post-Project Emission Factors (EF2)

N-758-3-4, '-7-4, '-11-3 and '-14-5

The applicant is not proposing any changes to the existing emission factors; therefore, EF2 will be equal to EF1 for each permit unit.

C. Calculations

1. Pre-Project Potential to Emit (PE1)

N-758-3-3

Per project N-1123688,

PE1 = 198.0 lb-VOC/day; 26,600 lb-VOC/yr

N-758-7-3

Per project N-1123688,

PE1 = 128.0 lb-VOC/day; 21,450 lb-VOC/yr

Note that the total potential emissions from permit units N-758-3-3 and '-7-3 are 26,600 lb-VOC/yr since both tanks are limited to 10.25 million gallons per year, which is also the throughput for each tank.

N-758-11-2

Per project N-1011180,

PE1 = 0.8 lb-VOC/day

PE1 = 0.8 lb-VOC/day x 365 days/yr = 292 lb-VOC/yr

N-758-14-5

Per project N-1123247,

PE1 = 29.1 lb-VOC/day; 6,762 lb-VOC/yr

2. Post Project Potential to Emit (PE2)

N-758-3-4, '-7-4 and '-14-5

The applicant has proposed to store biodiesel in addition to storing denatured ethanol, gasoline or diesel. The vapor pressure of gasoline is greater than denatured ethanol, regular diesel and biodiesel fuels; therefore, storing gasoline will always result in the highest amount of emissions as opposed to the other fuels. The worst-case emissions shown under PE1 (above) are based on the gasoline storage. Furthermore, adding mixers to these tanks is merely to blend diesel and biodiesel products. The blending process is not expected to cause additional emissions from the tanks. Thus, PE2 is expected to be same as PE1.

Note that diesel including biodiesel storage is exempt per section 6.6.5 of Rule 2020 (8/18/11) since the initial boiling point of diesel (boiling temperature 356°F - 644°F) and biodiesel fuel (boiling temperature 599°F – 662°F) is greater than 302°F.

N-758-11-3

As stated in the proposal section, the company has proposed to add a diesel offloading header, add piping to connect the diesel offloading header to the tanks under permits N-758-3-4, '-7-4 and '-14-5, and an upgrade the existing pump.

This proposal result in an increase in components (valves, connectors, flanges, etc.) that will result in an increase in fugitive emission associated with this permit unit. For conservative purposes, all additional components are assumed to be in VOC service. Fugitive VOC emissions from the valves, flanges, compressor seals etc. will be determined using CAPCOA 's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-1b (Feb 1999) – Marketing Terminal. The total hydrocarbons (THC) reported in Table IV-1b are assumed to be VOCs.

$$PE2 = EF2 \text{ lb/hr/source} \times \text{Quantity} \times 24 \text{ hr/day}$$

Component	EF2 (lb/hr/source)	Quantity	EF2 (lb/hr/source)	PE2 (lb/day)
Valves (light liquid)	9.48E-05	11	9.48E-05	0.025
Pump seals (light liquid)	1.19E-03	3	1.19E-03	0.086
Connectors and flanges (light liquid)	1.76E-05	12	1.76E-05	0.005
Total:				0.1

$$PE2 = 0.1 \text{ lb-VOC/day} \times 365 \text{ days/yr}$$

$$= 37 \text{ lb-VOC/yr}$$

$$\text{Total PE2} = 0.8 \text{ lb-VOC/day (existing)} + 0.1 \text{ lb-VOC/day (new)}$$

$$= 0.9 \text{ lb-VOC/day}$$

$$\text{Total PE2} = 292 \text{ lb-VOC/yr (existing)} + 37 \text{ lb-VOC/yr (new)}$$

$$= 329 \text{ lb-VOC/yr}$$

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all emission units with valid ATCs or PTOs at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site. Except for the permit units in this project, the potential emissions for each permit unit are taken from the application review of project N-1123247.

SSPE1 (lb/yr)					
Permit #	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
N-758-1-1	0	0	0	0	297
N-758-2-1	0	0	0	0	353
<b>N-758-3-3 and '-7-3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>26,600</b>
N-758-4-5	0	0	0	0	2,768
N-758-5-5	0	0	0	0	3,742
N-758-6-2	0	0	0	0	6,583
N-758-9-1	0	0	0	0	0
N-758-10-2	0	0	0	0	0
<b>N-758-11-2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>292</b>
N-758-13-9	0	0	0	0	25,042
<b>N-758-14-4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6,762</b>
N-758-15-1	0	0	0	0	9
N-758-16-0	0	0	0	0	1,804
ERC	0	0	0	0	0
Total	0	0	0	0	74,252

4. Post-Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

SSPE2 (lb/yr)					
Permit #	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
N-758-1-1	0	0	0	0	297
N-758-2-1	0	0	0	0	353
<b>N-758-3-4 and '-7-4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>26,600</b>
N-758-4-5	0	0	0	0	2,768
N-758-5-5	0	0	0	0	3,742

Continue...

SSPE2 (lb/yr)					
Permit #	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
N-758-6-2	0	0	0	0	6,583
N-758-9-1	0	0	0	0	0
N-758-10-2	0	0	0	0	0
<b>N-758-11-3</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>329</b>
N-758-13-9	0	0	0	0	25,042
<b>N-758-14-5</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>6,762</b>
N-758-15-1	0	0	0	0	9
N-758-16-0	0	0	0	0	1,804
ERC	0	0	0	0	0
Total	0	0	0	0	74,289

5. Major Source Determination

Rule 2201 Major Source Determination

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- Any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR Part 70.2

This facility operates bulk terminal where organic liquids (gasoline, diesel, denatured ethanol, etc.) are stored and loaded to tanker trucks to be distributed to the nearby gasoline dispensing facilities. This operation is subject to various NSPS (40 CFR Part 60) and NEHAPS (40 CFR Part 63). Therefore, fugitive emissions are included in the SSPE balance for Major source determination purpose.

Rule 2201 Major Source Determination (lb/year)					
Category	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
SSPE1	0	0	0	0	74,252
SSPE2	0	0	0	0	74,289
Major Source Thresholds	20,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	Yes

From the above table, it is determined that this facility is an existing Major Source and will remain Major Source for VOC emissions after the proposed project.

**Rule 2410 Major Source Determination**

The total gasoline storage capacity at this site is less than 300,000 barrels. Therefore, this facility does not qualify for a source category specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)						
Category	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>
Estimated Facility PE before Project Increase	0.0	37.1	0.0	0.0	0.0	0.0
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source?	No	No	No	No	No	No

**6. Baseline Emissions (BE)**

The BE calculation (in lb/year) is performed on a pollutant-by-pollutant basis for each unit within the project to calculate the quarterly net emissions change, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE is equal to pre-project Potential to Emit (PE1) for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

Otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

Section 3.13 of Rule 2201 defines Clean Emission Unit as an emission unit that meets one of the following criteria:

- The unit is equipped with an emissions control technology with a minimum control efficiency of at least 95% (or at least 85% for lean-burn, internal combustion engines); or
- The unit is equipped with emission control technology that meets the requirements for achieved-in-practice (AIP) BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

**N-758-3 and '-7**

During gasoline and denatured ethanol storage, each tank is required to be vented to the carbon adsorber system, which is capable of reducing at least

95% VOC emissions. Therefore, these units are Clean Emission Units and the BE is set equal to PE1.

N-758-11

VOC vapors displaced from storage tanks (N-758-3, '-7 and or '-14) during offloading (receiving) operation will either be vented to the carbon adsorber system (under permit N-758-13, if storing gasoline or denatured ethanol in fixed roof tanks under N-758-3 and '-7) or by the primary and secondary seals (if stored in internal or external floating roof tanks). The carbon adsorber system and the primary and secondary seals are capable of reducing at least 95% VOC emissions. Therefore, BE is set equal to PE1.

N-758-14

This tank is equipped with mechanical shoe type primary and secondary wiper seals that are capable of reducing at least 95% VOC emissions. Therefore, BE is set equal to PE1.

Note that the proposed storage of diesel/biodiesel is exempt from the District permit requirements. Therefore, BE are not determined for the above permit units.

7. SB-288 Major Modification

SB-288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Per section VII.C.5 of this document, this facility is a Major Source for VOC emissions. Thus, analysis is required to determine if this project triggers an SB-288 Major Modification.

To determine if the proposed project triggers an SB-288 major modification, net emission increase (NEI) is calculated by determining the sum of the difference of PE2 and historical emissions (HE) of all the units involved in the project. This NEI value is then compared with the SB 288 Major Modification threshold of 50,000 lb-VOC/year.

$$NEI = \sum(PE2 - HE)$$

NEI would be highest if HE is set equal zero. Thus,

$$\begin{aligned} NEI &= \sum PE2 \\ &= (PE2_{N-758-3-4} + PE2_{N-758-7-4}) + (PE2_{N-758-11-3}) + (PE2_{N-758-14-5}) \\ &= (26,600) \text{ lb-VOC/yr} + (329) \text{ lb-VOC/yr} + (6,762) \text{ lb-VOC/yr} \\ &= 33,691 \text{ lb-VOC/yr} \end{aligned}$$

The total VOC emissions from the units involved in the project are less than the SB 288 Major Modification threshold. Therefore, this project is not an SB-288 Major Modification.

#### 8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Per section VII.C.5 of this document, this facility is a Major Source for VOC emissions. Thus, analysis is required to determine if this project triggers a Federal Major Modification. Guidance provided in District draft policy "Implementation of Rule 2201 (as amended on 12/18/08 and approved by EPA on 6/10/10) for SB 288 Major Modifications and Federal Major Modifications (2/8/11)" is used to arrive at the conclusions under each permit.

##### N-758-3-4, '-7-4, '-14-5

The proposed modification to add mixers will not result in an increase in design capacity or potential to emit of any emission unit. Further, this modification does not impact the ability of any emission unit to operate at a higher utilization rate than the permitted limits. Therefore, the emission increase from each unit is presumed to be zero.

Note that storage of diesel/biodiesel is exempt per section 6.6.5 of District Rule 2020. Therefore, no further discussion is required.

##### N-758-11-3

The proposed modification to install a diesel offloading header, add piping to connect the diesel offloading header to the existing storage tanks (N-758-3, '-7 and '-14), and an upgrade to the existing offloading pump, will not result in an increase process emissions, or throughput rate over the permitted limits under permits N-758-3, '-7 or '-14, and diesel/biodiesel is essentially non-volatile. Further, the emissions increase due to additional new components is below 0.5 lb/day, which is rounded to zero to be consistent with the guidance in District's Policy APR-1130 (1/14/15) "Increases in Maximum Daily Permitted Emissions of Less than or Equal to 0.5 lb/day" and District's draft policy "Implementation of Rule 2201 (as amended on 12/18/08 and effective on 6/10/10) for SB288 and Federal Major Modifications" (2/8/11). Therefore, emissions increase is equated to zero for this permit unit.

Since the total emissions increase from the project is not above zero pounds per year threshold, this project is not a Federal Major Modification.

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The following pollutants are evaluated:

- NO<sub>2</sub> (as a primary pollutant)
- SO<sub>2</sub> (as a primary pollutant)
- CO
- PM, PM<sub>10</sub>

Step 1:

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not. Per section VII.C.5 of this document, this facility is not an existing Major Source under PSD.

Step2:

In the case the facility is NOT an existing PSD Major Source but is an existing source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD Major Source.

I. Potential to Emit for New or Modified Emission Units vs PSD Major Source Thresholds

As a screening tool, the project potential to emit from all new and modified units is compared to the PSD major source threshold, and if total project potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore, the following PSD Major Source thresholds are applicable.

Potential to Emit (tons/year)						
Category	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>
Total PE N-758-3-4, '-7-4, '-11-3 and '-14-5	0.0	16.8	0.0	0.0	0.0	0.0
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	No	No	No	No	No	No

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore, Rule 2410 is not applicable and no further discussion is required.

#### 10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Except for N-758-11, QNEC will be zero for each pollutant.

QNEC for N-758-11 will be 9.25 lb/quarter (Q1: 9 lb, Q2: 9, Q3: 9 lb and Q4: 10 lb) for VOC emissions.

### VIII. Compliance

#### Rule 2201 New and Modified Stationary Source Review Rule

##### 1. Best Available Control Technology (BACT)

BACT requirements shall be triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless exempted pursuant to Section 4.2, BACT shall be required for the following actions\*:

- Any new emissions unit or relocation from one Stationary Source to another of an existing emissions unit with a Potential to Emit (PE2) exceeding 2.0 pounds in any one day;
- Modifications to an existing emissions unit with a valid Permit to Operate resulting in an Adjusted Increase in Permitted Emissions (AIPE) exceeding 2.0 pounds in any one day;
- Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined in this rule.

\*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

The BACT requirements for each unit are evaluated in the following section:

##### a. New emissions unit/Relocation of emission unit – PE2 > 2.0 lb/day

###### N-758-11-3

Per section VII.C.2 of this document, the potential emissions from each new component are not greater than 2.0 pounds per day. Thus, BACT is not triggered.

##### b. Modification of emission units – AIPE > 2.0 lb/day

AIPE is calculated using the equations mentioned in Section 4.3 and 4.4 of Rule 2201.

$$AIPE = PE2 - \left(\frac{EF2}{EF1}\right)(PE1)$$

N-758-3, '-7-4 and '-14-5

The applicant has proposed to store biodiesel, and add mixers to blend regular diesel and biodiesel products. EF1 is equal EF2. Thus,

$$AIPE = PE2 - PE1$$

PE2 is equal to PE1 for each permit unit. Therefore, AIPE is zero for VOC emissions.

c. SB-288/Federal Major Modification

Per sections VII.C.7 and VII.C.8 above, this project is not an SB 288 and/or Federal Major Modification for any pollutant. Thus, BACT is not triggered for any pollutant under this section.

2. Offsets

Offsets are examined on pollutant-by-pollutant basis. The following table summarizes SSPE2, offset thresholds, and whether or not offsets are triggered.

Category	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
SSPE2 (lb/yr)	0	0	0	0	74,289
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets Triggered?	No	No	No	No	Yes

Section 4.7.1 states that for pollutants with SSPE1 greater than the emission offset threshold levels, emission offsets shall be provided for all increases in Stationary Source emissions, calculated as the differences of post-project Potential to Emit (PE2) and the Baseline Emissions (BE) of all new and modified emissions units, plus all increases in Cargo Carrier emissions. Thus,

$$EOQ = \Sigma(PE2 - BE) + ICCE, \text{ where}$$

- PE2 = Post-Project Potential to Emit
- BE = Baseline Emissions
- ICCE = Increase in Cargo Carrier emissions

There is no increase in Cargo Carrier emissions from this project. Thus,

$$EOQ = \Sigma(PE2 - BE)$$

N-758-3-4, '-7-4, '-11-3 and '-14-5

Per section VII.C.6 of this document, BE is equal to PE1 for each unit. The total EOQ is summarized in the table below:

Permit #	PE2 (lb-VOC/yr)	PE1 (lb-VOC/yr)	EOQ (lb-VOC/yr)
N-758-3-4 and '-7-4	26,600	26,600	0
N-758-11-3	320	283	37
N-758-14-5	6,762	6,762	0
		EOQ:	37

Note that offsets will not be required since the total project annual emission increase for all units in the project averages less than or equal to 0.5 lb/day and is therefore rounded to zero for the purposes of triggering NSR requirements. This conclusion is consistent with the guidance in District Policy APR-1130.

3. Public Notification

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications; and/or
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant; and/or
- c. Modifications that increase SSPE1 from a level below the emission offset threshold to a level exceeding the emissions offset threshold for one or more pollutants; and/or
- d. New stationary sources with SSPE2 exceeding the emissions offset threshold level for one or more pollutants; and/or
- e. Any permitting action resulting in an SSPE of greater than 20,000 lb/year for any one pollutant; and/or
- f. Any project which results in a Title V significant permit modification.

Detailed discussion on each of the above items is presented in the following section:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this facility is not a new facility, public noticing is not required for this project.

As demonstrated in sections VII.C.7 and VII.C.8 of this document, this project is not an SB-288 or Federal Major Modification; therefore, public notice is not required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements.

The potential emissions due to the new component under permit N-758-11 are not greater than 100 lb/day. Therefore, public notice is not required.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/yr)	SSPE2 (lb/yr)	Offset Threshold (lb/yr)	Public Notice Required?
NOx	0	0	20,000	No
SOx	0	0	54,750	No
PM <sub>10</sub>	0	0	29,200	No
CO	0	0	200,000	No
VOC	74,289	74,252	20,000	No

As detailed above, the proposed project does not result in an increase in SSPE1 from a level below the emission offset threshold to a level exceeding the emissions offset threshold for any pollutant; therefore, public notice is not required.

d. New Stationary Source with SSPE2 exceeding Offset Threshold

This facility is not a new stationary source. Therefore, public notice will not trigger under this section.

e. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. The District practice is to define SSIPE as the difference between SSPE2 and SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table. Note that negative SSIPE values are equated to zero.

SSIPE Public Notice					
Pollutant	SSPE2 (lb/yr)	SSPE1 (lb/yr)	SSIPE (lb/yr)	SSIPE Public Notice Threshold (lb/yr)	Public Notice Required?
NOx	0	0	0	20,000	No
SOx	0	0	0	20,000	No
PM <sub>10</sub>	0	0	0	20,000	No
CO	0	0	0	20,000	No
VOC	74,289	74,252	37	20,000	No

As demonstrated above, SSIPE value for each pollutant is less than 20,000 lb/year; therefore, public notice is not required.

f. Title V Significant Permit Modification

The proposed project is a minor modification per section 3.20 of Rule 2520; therefore, public notice is not required for this project.

4. Daily Emission Limits

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions to a level at or below the emissions associated with the maximum design capacity.

N-758-3, '-7 and '-14:

The DELs in the existing PTOs will be replicated in the permits under this project.

N-758-11

- Fugitive VOC from valves, flanges, connector, pump seals etc., associated with this permit unit shall not exceed 0.6<sup>1</sup> pounds per day. [District Rule 2201]
- Fugitive VOC emissions from component leaks shall be calculated using component count and appropriate emission factors from "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-1b (Feb 1999) - Marketing Terminal. [District Rule 2201]

5. Compliance Assurance

Source testing, monitoring, recordkeeping and reporting

No additional testing, monitoring, recordkeeping or reporting is required. However, any existing

Compliance is expected with this Rule.

**Rule 2410 Prevention of Significant Deterioration**

As discussed in section VII.C.9 of this document, this project is not subject to the requirements of this rule.

**Rule 2520 Federally Mandated Operating Permits**

This facility is a Major Source for VOC emissions. Therefore, this facility is subject to the requirements of this rule. The proposed project is a "minor modification" to the Title V permit, as the project is not an SB-288 or Federal Major Modification. Equilon

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<sup>1</sup> 0.5 lb-VOC/day (existing, per project N-1011180) + 0.1 lb-VOC/day (from this project)

has proposed to process this project with COC. The following conditions will be included in the permit:

- This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201]
- Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4]

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs and
- The source's suggested draft permit (Appendix I of this document) and
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix IV of this document).

Section 5.3.4 of this rule requires the permittee shall file an application for administrative permit amendments prior to implementing the requested change except when allowed by the operational flexibility provisions of section 6.4 of this rule. The facility is expected to notify the District by filing TV Form-008 upon implementing the ATC. The District Compliance Division is expected to submit a change order to implement ATCs into Permits to Operate (PTO).

Compliance is expected with this Rule.

#### **Rule 4001      New Source Performance Standards**

*40 CFR Part 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

N-758-3-4, '-7-4, '-14-5

Per application review under project N-111745, the tanks under these permits were installed before July 23, 1984.

Furthermore, 40 CFR Part 60 Subpart A Section 60.2, defines "modification" as any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into

the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted..

The proposed project does not result in an increase in emissions or results in emissions of any air pollutant that are not previously emitted. Therefore, these tanks are not subject to this subpart.

#### **Rule 4002 National Emission Standards for Hazardous Air Pollutants**

##### *40 CFR Part 63 Subpart R – Gasoline Distribution Facilities (Bulk Gasoline terminals and Pipeline Breakout Stations)*

Per application review under project N-1111745, this terminal is not a major source of any hazardous air pollutant (HAP). Furthermore, the proposed project results in an insignificant increase in HAP emissions. Adding these emissions to the previously estimated emissions will not make them a major source for any HAP. Therefore, this facility is not subject to the requirements of this subpart.

##### *40 CFR Part 63 Subpart BBBB – Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*

This subpart establishes emission limitations and management practices for HAP emitted from "area source" gasoline distribution bulk terminals, bulk plants and pipeline facilities. The subpart was last amended on January 24, 2011.

The District prepared an initial Title V application review on February 7, 2013 under project N-1111745 and included all the applicable requirements of this subpart. These requirements will be replicated in the permits under this project. Therefore, continued compliance is expected with this subpart.

#### **Rule 4101 Visible Emissions**

Section 5.0, indicates that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour, which is dark or darker than Ringlemann 1 or equivalent to 20% opacity.

Condition #22 in the facility-wide permit N-758-0-2 enforces continued compliance with the requirements of this rule. Therefore, no additional condition is necessary.

#### **Rule 4102 Nuisance**

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations provided the equipment is well maintained. Therefore, compliance with this rule is expected. Condition #41 in the facility-wide permit N-758-0-2 enforces continued compliance with the requirements of this rule. Therefore, no additional condition is necessary.

**California Health & Safety Code 41700**

District Policy APR 1905 – Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite. The risk management review (RMR) results due to increase in fugitive emissions are summarized in the following table:

RMR Summary			
Categories	Bulk Off-Loading Operation (Unit 11-3)	Project Totals	Facility Totals
Prioritization Score	0.73	0.73	>1.0
Acute Hazard Index	0.00	0.00	0.00
Chronic Hazard Index	0.00	0.00	0.00
Maximum Individual Cancer Risk ( $10^{-6}$ )	0.03	0.03	4.28
T-BACT Required?	No		
Special Permit Conditions?	No		

The acute and chronic indices are below 1.0, and the cancer risk factor associated with the project is less than 1.0 in a million. In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).

Compliance is expected with this Rule.

**Rule 4623 Storage of Organic Liquids**

N-758-3-4, '-7-4, and '-14-5

The tanks under the above permits are subject to the requirements of this rule. These requirements are discussed under initial Title V application review that was prepared on February 7, 2013 under project N-1111745. This rule has not been amended since the initial Title V permitting action. The existing PTOs contain the applicable requirements from the rule. These requirements will be replicated in the draft ATCs under this project. Therefore, continued compliance is expected with this rule.

**Rule 4624 Transfer of Organic Liquid**

*Section 2.0 – Applicability*

This rule shall apply to organic liquid transfer facilities as defined in this rule.

### *Section 3.0 – Definitions*

**Organic liquid transfer facility:** any aggregate or combination of transfer racks and vapor control equipment at a location, including, but not limited to, the stationary organic liquid pump, and the hose end connector, and the discharge of the vapor control device(s).

**Transfer rack:** a loading rack as defined in Rule 1020 or an unloading rack defined in Rule 2020. This rule applies only to racks with stationary pumps.

**Unloading rack (Rule 2020):** as any aggregate or combination of equipment or control equipment that unloads organic liquid into a storage tank from tank trucks, trailers, or railroad tank cars. The unloading rack is the portion of the connection system from the connection at the inlet of the organic liquid pump to and including the hose and connector at the delivery tank.

**Class 1 Organic Liquid Transfer Facility:** any location transferring 20,000 gallons or more on any one day of organic liquids with a TVP of 1.5 psia or greater to or from tank trucks, trailers, or railroad tank cars.

**Class 2 Organic Liquid Transfer Facility:** any location transferring 4,000 gallons or more but less than 20,000 gallons on any one day of organic liquids with a TVP of 1.5 psia or greater to or from tank trucks, trailers, or railroad tank cars.

After reviewing the above definitions, it is concluded the rule applies to the offloading operation under permit N-758-11, and the transfer operation is a Class 1 organic liquid transfer operation.

### *Section 5.0 - Requirements*

Section 5.1 requires a Class 1 organic liquid transfer facility to emit less than or equal to 0.08 lb-VOC/1,000 gallon of organic liquid transfer and use either one of the following systems: bottom loading, or route the vapors to a vapor collection system, or fixed or floating roof or pressure vessel, or a closed VOC emissions control system.

The truck offloading operation is accomplished by opening vapor return line vent on the tanker truck prior to or concurrently while operating the vacuum pump to unload tanker trucks into one of the storage tanks. The storage tanks are either vented to the carbon adsorber system or have primary and secondary seals to reduce the VOC emissions. The carbon adsorber system is covered under permit N-758-13, and is required to comply with the 0.08 lb-VOC/1,000 gallon of organic liquid transfer limit. Therefore, the offloading operation complies with the requirements of this rule. Note that permit N-758-11 prohibits the use of the rack to load the organic liquid into the tanker trucks. Note that the use of vacuum pump is expected to result in minimal amount of VOC from the vent on the delivery trucks.

Section 5.3 requires that a transfer operation utilizing a closed VOC emission control system or utilizing a container that meets the control requirements of Rule 4623 (Storage of Organic Liquids) to meet the emission control requirements of this rule shall demonstrate compliance with Sections 5.1 and 5.2 by complying with the leak inspection requirements of Section 5.9 (i.e. leak inspection requirements). The following conditions will be included in permit N-758-11:

- A leak is defined as the dripping of VOC containing liquid at a rate of more than 3 drops per minute; or detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above a background as methane. [District Rule 4624]
- The operator shall inspect the vapor collection system, the vapor disposal system, and each transfer rack handling organic liquids for leaks during transfer at least once every calendar quarter. The leak inspections shall be performed during product transfer using a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Method 21. The instrument shall be calibrated with methane in accordance with the procedures specified in EPA Method 21 or the manufacturer's instructions, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4624]
- All equipment that are found leaking shall be repaired or replaced within 72 hours. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be re-inspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624]
- The operator may apply for a written approval from the District to change the inspection frequency from quarterly to annually provided no leaks were found during the inspections during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency would revert back to quarterly and the operator shall contact the District in writing within 14 days. [District Rule 4624]

Section 5.4 requires that the vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and six inches water column vacuum.

The operation under permit N-758-11 is to receive gasoline, denatured ethanol, or diesel/biodiesel products via tanker truck. The delivery truck will not be loaded using the equipment under this permit; therefore, this requirement is not applicable to this operation.

Section 5.5 requires that all delivery tanks which previously contained organic liquids with a TVP of 1.5 psia or greater at the storage container's maximum organic liquid storage temperature shall be filled only at transfer facilities satisfying Sections 5.1, 5.2, or 5.4, as applicable.

The truck delivering the organic liquids will not be re-loaded using the equipment under permit N-758-11; therefore, this section does not apply.

Section 5.6 requires that transfer rack and vapor collection equipment shall be designed, installed, maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections. Section 3.13 defines excess organic liquid drainage: more than 10 milliliters liquid drainage. Such liquid drainage for disconnect operations shall be determined by computing the average drainage from three consecutive disconnects at any one permit unit. The following condition will be included permit N-758-11:

- The transfer rack and vapor collection equipment shall be maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections. [District Rule 4624]
- Excess organic liquid drainage is defined as an average of more than 10 milliliters liquid drainage per disconnect from three consecutive disconnects. [District Rule 4624]

Section 5.7 states that the construction of any new top loading facility or the reconstruction, as defined in 40 CFR 60.15, or the expansion of any existing top loading facility with top loading equipment shall not be allowed.

The proposed project does not involve construction or reconstruction of any new top loading facility. Therefore, this section does not apply.

Section 5.8 states that notwithstanding any other provision of this rule, organic liquid transfer facilities exclusively handling liquefied petroleum gas need not comply with the bottom loading provisions of Sections 5.1, 5.2 or 5.7, provided the operator complies with the emission limit of Section 5.1, 5.2 and the provisions of Section 5.6.

This proposed project does not involve handling of LPG fuel; therefore, this section does not apply.

Section 5.9 lists leak inspection requirements. These requirements are discussed under section 5.3 (above). Therefore, no further discussion is required.

#### *Section 6.1 - Recordkeeping*

Section 6.1.3 requires the operator to keep records of daily liquid throughput and the results of leak inspections. The following conditions will be included in permit N-758-11:

- The operator shall maintain a daily record of the quantity of tanker trucks off-loaded (received), the type of liquid off-loaded (received), and the quantity of liquid off-loaded (received) in gallons. [District Rules 2201 and 4624]
- The operator shall keep records of leak inspections including the date, name of component and its location and measured ppmv value, name of the operator and the company conducting the leak inspection. [District Rules 2201 and 4624]

Section 6.1.4 requires the operator to keep records for at least five years. The following condition in permit N-758-11 ensures on-going compliance:

- All records shall be maintained and retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4624]

### *Section 6.2 – Compliance Testing*

Section 6.2.1 requires the operator of Class 1 or Class 2 organic liquid transfer facility to perform an initial source test of the VOC emission control system. However, facilities equipped with a closed VOC control system, or a fixed roof tank or floating roof tank or a pressure vessel complying with Rule 4623 are not required to conduct this test. Further, section 6.2.2 requires the operator of any Class 1 or Class 2 organic liquid transfer facility shall perform the source test specified in Section 6.3.2 once every 60 months, but no more than 30 days before or after initial source test anniversary date.

During gasoline or denatured ethanol storage, the tanks under N-758-3 and '-7 are required to be vented to the carbon adsorber system under permit N-758-13. This carbon adsorber system was tested September 26, 2014. Therefore, initial source test is not required.

The tank under permit N-758-14 is a floating roof tank and is required to comply with Rule 4623. Therefore, compliance testing is not required.

Section 6.3 contains several test methods. The facility will be required to conduct leak inspections using portable hydrocarbon detector in accordance with EPA Method 21.

### *Section 7.0 – Compliance Schedule*

This section lists compliance schedule for existing and new facilities. This facility is expected to operate in compliance with the requirements of this Rule.

Compliance is expected with this Rule.

### **California Environmental Quality Act (CEQA)**

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that the proposed modifications did not trigger Best Available Control Technology (BACT) requirements. Furthermore, the District concludes that potential health impacts are less than significant from the proposed emission units. Therefore, this project does not require discretionary judgment or deliberation. Consequently, this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts CEQA for those projects over which a public agency exercises only ministerial approval; therefore, the District finds that this project to be exempt from the provisions of CEQA.

### **IX. Recommendation**

During evaluation of this project, it was discovered that the throughput rate in PTO N-758-7-3 was mistakenly set to 1,260,000 gallons per day during a Title V minor modification project N-1132104. The limit should have been retained at 814,800 gallons per day, as it was stated in the ATC N-758-7-2. Since this mistake was made on District's part, it is recommended that limit should be administratively corrected to 814,800 gallons per day for permit N-758-7.

Compliance with all applicable rules and regulations is expected. Issue Authorities to Construct N-758-3-4, '-7-4, '-11-3 and '-14-5 subject to the permit conditions on the attached draft Authorities to Construct in Appendix I.

**X. Billing Information**

Permit #	Fee Schedule	Fee Description	Previous Fee Schedule
N-758-3-4	3020-05F	630,000 gal	3020-05F
N-758-7-4	3020-05E	399,000 gal	3020-05E
N-758-11-3	3020-06	Miscellaneous	3020-06
N-758-14-5	3020-05 F	689,136 gal	3020-05F

**Appendices**

- Appendix I: Draft Authority to Construct Permits
- Appendix II: Existing Permits to Operate
- Appendix III: Risk Management Review Summary
- Appendix IV: Compliance Certification Form

**Appendix I**  
**Draft Authority to Construct Permits**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-758-3-4

LEGAL OWNER OR OPERATOR: EQUILON ENTERPRISES LLC  
MAILING ADDRESS: SHELL OIL PRODUCTS US ATTN: ENV COORD  
2555 13TH AVENUE SW  
SEATTLE, WA 98134

LOCATION: ROUGH & READY ISLAND  
STOCKTON, CA 95203

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF ONE 630,000 GALLON ABOVEGROUND TANK (TANK #14) STORING GASOLINE, DENATURED ETHANOL, OR DIESEL SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13) DURING GASOLINE AND DENATURED ETHANOL STORAGE: INSTALL MIXER INSIDE THE TANK AND ALLOW BIODIESEL STORAGE. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: ONE 630,000 GALLON ABOVEGROUND TANK WITH MIXER (TANK #14) STORING GASOLINE, DENATURED ETHANOL, OR DIESEL/BIODIESEL SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13) DURING GASOLINE AND DENATURED ETHANOL STORAGE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The total daily throughput of the organic liquid shall not exceed 1,260,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total monthly throughput of the organic liquid shall not exceed 10,250,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The total monthly throughput of tanks under permit N-758-3 and -7 shall not exceed 10,250,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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Arnaud Marjolle, Director of Permit Services

N-758-3-4 Sep 16 2015 6:12AM - KAHLOHJ John Inspection NOT Required

6. Reid vapor pressure (RVP) of the organic liquid stored in this tank shall not exceed 14.0 psia. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all the VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be maintained in a leak-free condition. Collected vapors shall be directed to a control device capable of reducing at least 95% of VOC emissions (by weight) as determined by the test method specified in this permit. [District Rule 4623 and 40 CFR Part 63.11087(a)] Federally Enforceable Through Title V Permit
8. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
9. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
10. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 500 ppmv, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 500 ppmv, above background, is a violation of this permit and shall be reported as a deviation. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623 and 40 CFR Part 63.11087(a)] Federally Enforceable Through Title V Permit
11. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
12. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Source testing to verify compliance with the VOC control efficiency of the vapor recovery system shall be conducted within 120 days of switching fuel from diesel to gasoline or denatured ethanol, or on or before the next source test required by permit N-758-13 (or in most recently issued ATC for N-758-13), whichever is earlier, and annually thereafter while loading this "empty tank" with gasoline (preferably) or denatured ethanol. "Empty tank" in this requirement means a tank with fuel less than or equal to 50% of the maximum storage capacity of the tank. The tank loading rate (gallons/hr) during the testing shall be representative of the loading rate under normal conditions. The loading rate shall be reported in the test report. The test results may be substituted for permit N-758-7-2 instead of performing a separate test. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. The permittee shall establish relevant parameters to ensure on-going compliance with the VOC control efficiency of 95% for the vapor recovery system based on the data gathered during the initial source testing. These parameters may include, but not limited to, vapor flow rate (cfm), activated carbon bed regeneration frequency, or any other similar parameter. These parameters may be administratively included in the Permit to Operate. The established parameters shall be monitored each day during gasoline or denatured ethanol storage. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25A may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. Should the applicant decide to use different methodology, the methodology must be approved by the District prior to its use. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
17. Stack gas velocity or volumetric flow rate shall be determined using EPA Methods 2, 2A, or 2D. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. Measurements of a gas-leak concentration from the components in the vapor recovery system shall be determined using EPA Method 21 on a quarterly basis when gasoline or denatured ethanol is stored in the tank. Records of the measurements shall be retained on site. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. The permittee shall keep record of the following items on a monthly basis: (a) Month, year; (b) Type of organic liquid stored (denatured ethanol, gasoline, etc.); (c) RVP of the organic liquids stored (psia); (d) Maximum temperature of the liquid in tank (°F); (e) Storage duration (days); (f) Throughput rate (gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
21. The monthly throughput rate may be divided by the storage duration to estimate the daily throughput rate, which shall be used to verify compliance with the permitted daily throughput rate in this permit. Permittee shall record the estimated daily throughput rate at the end of each month for this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR Part 63.11094(a)] Federally Enforceable Through Title V Permit
23. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline and denatured ethanol shall be submitted to the District. [District Rule 2080] Federally Enforceable Through Title V Permit
24. The owner or operator shall keep the following records for the closed vent system and control device: 1) A copy of the operating plan; and 2) A record of the measured values of the parameters monitored in accordance with 40 CFR 60.113b(c)(2). [40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit
25. A log of all breakdowns of the vapor recovery system indicating the times, dates, and gallons processed during the breakdown periods shall be maintained on the premises at all times and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
26. The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rules 2201 and 4623 and 40 CFR Part 63.11094(a)] Federally Enforceable Through Title V Permit

**DRAFT**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-758-7-4

LEGAL OWNER OR OPERATOR: EQUILON ENTERPRISES LLC  
MAILING ADDRESS: SHELL OIL PRODUCTS US ATTN: ENV COORD  
2555 13TH AVENUE SW  
SEATTLE, WA 98134

LOCATION: ROUGH & READY ISLAND  
STOCKTON, CA 95203

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF ONE 399,000 GALLON ABOVEGROUND TANK (TANK #17) STORING GASOLINE, DENATURED ETHANOL, OR DIESEL SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13) DURING GASOLINE AND DENATURED ETHANOL STORAGE: INSTALL MIXER INSIDE THE TANK AND ALLOW BIODIESEL STORAGE. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: ONE 399,000 GALLON ABOVEGROUND TANK WITH MIXER (TANK #17) STORING GASOLINE, DENATURED ETHANOL, OR DIESEL/BIODIESEL SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13) DURING GASOLINE AND DENATURED ETHANOL STORAGE

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The total daily throughput of the organic liquid shall not exceed 814,800 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The total monthly throughput of the organic liquid shall not exceed 10,250,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The total monthly throughput of tanks under permit N-758-3 and -7 shall not exceed 10,250,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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Araud Marjolle, Director of Permit Services

N-758-7-4 Sep 15 2015 8:12AM - KAPLONJ Joint Inspection NOT Required

6. Reid vapor pressure (RVP) of the organic liquid stored in this tank shall not exceed 14.0 psia. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all the VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be maintained in a leak-free condition. Collected vapors shall be directed to a control device capable of reducing at least 95% of VOC emissions (by weight) as determined by the test method specified in this permit. [District Rule 4623 and 40 CFR Part 63.11087(a)] Federally Enforceable Through Title V Permit
8. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
9. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
10. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 500 ppmv, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 500 ppmv, above background, is a violation of this permit and shall be reported as a deviation. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623 and 40 CFR Part 63.11087(a)] Federally Enforceable Through Title V Permit
11. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
12. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
13. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Source testing to verify compliance with the VOC control efficiency of the vapor recovery system shall be conducted within 120 days of switching fuel from diesel to gasoline or denatured ethanol, or on or before the next source test required by permit N-758-13 (or in most recently issued ATC for N-758-13), whichever is earlier, and annually thereafter while loading this "empty tank" with gasoline (preferably) or denatured ethanol. "Empty tank" in this requirement means a tank with fuel less than or equal to 50% of the maximum storage capacity of the tank. The tank loading rate (gallons/hr) during the testing shall be representative of the loading rate under normal conditions. The loading rate shall be reported in the test report. The test results may be substituted for permit N-758-7-2 instead of performing a separate test. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. The permittee shall establish relevant parameters to ensure on-going compliance with the VOC control efficiency of 95% for the vapor recovery system based on the data gathered during the initial source testing. These parameters may include, but not limited to, vapor flow rate (cfm), activated carbon bed regeneration frequency, or any other similar parameter. These parameters may be administratively included in the Permit to Operate. The established parameters shall be monitored each day during gasoline or denatured ethanol storage. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25A may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. Should the applicant decide to use different methodology, the methodology must be approved by the District prior to its use. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
17. Stack gas velocity or volumetric flow rate shall be determined using EPA Methods 2, 2A, or 2D. [District Rule 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

18. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
19. Measurements of a gas-leak concentration from the components in the vapor recovery system shall be determined using EPA Method 21 on a quarterly basis when gasoline or denatured ethanol is stored in the tank. Records of the measurements shall be retained on site. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. The permittee shall keep record of the following items on a monthly basis: (a) Month, year; (b) Type of organic liquid stored (denatured ethanol, gasoline, etc.); (c) RVP of the organic liquids stored (psia); (d) Maximum temperature of the liquid in tank (°F); (e) Storage duration (days); (f) Throughput rate (gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
21. The monthly throughput rate may be divided by the storage duration to estimate the daily throughput rate, which shall be used to verify compliance with the permitted daily throughput rate in this permit. Permittee shall record the estimated daily throughput rate at the end of each month for this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR Part 63.11094(a)] Federally Enforceable Through Title V Permit
23. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline and denatured ethanol shall be submitted to the District. [District Rule 2080] Federally Enforceable Through Title V Permit
24. The owner or operator shall keep the following records for the closed vent system and control device: 1) A copy of the operating plan; and 2) A record of the measured values of the parameters monitored in accordance with 40 CFR 60.113b(c)(2). [40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit
25. A log of all breakdowns of the vapor recovery system indicating the times, dates, and gallons processed during the breakdown periods shall be maintained on the premises at all times and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit
26. The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rules 2201 and 4623 and 40 CFR Part 63.11094(a)] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

PERMIT NO: N-758-11-3

LEGAL OWNER OR OPERATOR: EQUILON ENTERPRISES LLC  
MAILING ADDRESS: SHELL OIL PRODUCTS US ATTN: ENV COORD  
2555 13TH AVENUE SW  
SEATTLE, WA 98134

LOCATION: ROUGH & READY ISLAND  
STOCKTON, CA 95203

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF BULK OFF-LOADING OPERATION UTILIZED FOR GASOLINE OR ETHANOL OFF-LOADING (RECEIVING) LOCATED AT TRUCK LOADING LANE #3.: TO INCLUDE RECEIVING OF DIESEL/BIODIESEL, AND AN UPGRADE TO THE PUMP. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: BULK OFF-LOADING OPERATION UTILIZED FOR GASOLINE OR ETHANOL OR DIESEL/BIODIESEL OFF-LOADING (RECEIVING) LOCATED AT TRUCK LOADING LANE #3.

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Fugitive VOC from valves, flanges, connector, pump seals etc., associated with this permit unit shall not exceed 0.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fugitive VOC emissions from component leaks shall be calculated using component count and appropriate emission factors from "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-1b (Feb 1999) - Marketing Terminal. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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Arnaud Marjolle, Director of Permit Services

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5. The transfer rack and vapor collection equipment shall be maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
6. Vapor return line vents on tanker truck storage vessels shall be open only during the off-loading (receiving) operation and shall be closed immediately upon completion of any organic liquid off-loading (receiving). [District Rule 2201] Federally Enforceable Through Title V Permit
7. Tanker truck hatches shall be closed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The off-loading (receiving) equipment shall not be used for the loading of tanker trucks. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The operator shall not off-load (receive) any organic liquids with True Vapor Pressure greater than 11 psia. [District Rule 2201] Federally Enforceable Through Title V Permit
10. There shall be no more than 10 tanker trucks off-loaded (received) in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Total liquid drainage and leaks from all hose disconnects during the off-loading (receiving) operation shall not exceed 20 ml per tanker truck off-loaded (received). [District Rule 2201] Federally Enforceable Through Title V Permit
12. A leak is defined as the dripping of VOC containing liquid at a rate of more than 3 drops per minute; or detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above a background as methane. [District Rule 4624] Federally Enforceable Through Title V Permit
13. The operator shall inspect the vapor collection system, the vapor disposal system, and each transfer rack handling organic liquids for leaks during transfer at least once every calendar quarter. The leak inspections shall be performed during product transfer using a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Method 21. The instrument shall be calibrated with methane in accordance with the procedures specified in EPA Method 21 or the manufacturer's instructions, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4624] Federally Enforceable Through Title V Permit
14. The operator may apply for a written approval from the District to change the inspection frequency from quarterly to annually provided no leaks were found during the inspections during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency would revert back to quarterly and the operator shall contact the District in writing within 14 days. [District Rule 4624] Federally Enforceable Through Title V Permit
15. Excess organic liquid drainage is defined as an average of more than 10 milliliters liquid drainage per disconnect from three consecutive disconnects. [District Rule 4624] Federally Enforceable Through Title V Permit
16. The operator shall maintain a daily record of the quantity of tanker trucks off-loaded (received), the type of liquid off-loaded (received), and the quantity of liquid off-loaded (received) in gallons. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
17. The operator shall keep records of leak inspections including the date, name of component and its location and measured ppmv value, name of the operator and the company conducting the leak inspection. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
18. All records shall be maintained and retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT

PERMIT NO: N-758-14-5

LEGAL OWNER OR OPERATOR: EQUILON ENTERPRISES LLC  
MAILING ADDRESS: SHELL OIL PRODUCTS US ATTN: ENV COORD  
2555 13TH AVENUE SW  
SEATTLE, WA 98134

LOCATION: ROUGH & READY ISLAND  
STOCKTON, CA 95203

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF ONE 689,136 GALLON (16,408 BBL) ABOVEGROUND WELDED EXTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL/DIESEL STORAGE TANK (TANK #18) WITH A MECHANICAL SHOE TYPE PRIMARY SEAL AND A SECONDARY WIPER SEAL: INSTALL MIXER INSIDE THE TANK AND ALLOW BIODIESEL STORAGE. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: ONE 689,136 GALLON (16,408 BBL) ABOVEGROUND WELDED EXTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL/DIESEL/BIODIESEL STORAGE TANK (TANK #18) WITH A MIXER, A MECHANICAL SHOE TYPE PRIMARY SEAL AND A SECONDARY WIPER SEAL

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. VOC emissions from this tank shall not exceed 28.9 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. VOC emissions from this tank shall not exceed 6,707 pounds in any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Sayed Sadredin, Executive Director, APCO

Arnaud Marjolle, Director of Permit Services

N-758-14-5 Sep 18 2015 8:12AM - KAH/LOU : Joint Inspection NOT Required

5. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit. These records shall contain each process variable used (e.g., throughput, RVP, etc.) in estimating VOC emissions from this tank and actual process variables (e.g. throughput, RVP, etc.) of this tank. The process variables used in estimating the emissions shall be compared to that of the actual process variables to demonstrate compliance with each emission limit. The permittee may also use EPA's Tanks program (or other District accepted methodologies) with actual process variables to demonstrate compliance with each emission limit. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fugitive VOC from valves, flanges, connector, pump seals etc., associated with this tank shall not exceed any of the following limits: 0.2 lb/day and 55 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive VOC emissions from component leaks shall be calculated using component count and appropriate emission factors from "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-1b (Feb 1999) - Marketing Terminal. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Throughput of organic liquid for this tank shall not exceed any of the following limits: 698,136 gallons/day, 20,961,220 gallons/month and 50,952,827 gallons/year based on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
9. True vapor pressure (TVP) of the liquid stored in this tank shall be less than 11 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The owner or operator shall determine RVP and the temperature of the organic liquid (except diesel) stored on monthly basis. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. This tank shall be equipped with a closure device between the tank shell and roof edge consisting of two seals mounted one above the other; the one below shall be referred to as the primary seal, and the one above shall be referred as the secondary seal. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
12. The external floating roof shall float on the surface of the stored liquid at all times (i.e., off the roof leg supports) except during the initial fill until the roof is lifted off the leg supports and when the tank is completely emptied and subsequently 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. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five calendar days prior to performing the work. The tank must be in compliance with this rule before it may land on its legs. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
13. Gaps between the tank shell and the primary seal shall not exceed 1-1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
15. Accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm<sup>2</sup> per meter (10.01 in<sup>2</sup> per foot) of tank diameter, and the width of any gap shall not exceed 3.81 cm (1.5 inches). [40CFR 63.11087(c)] Federally Enforceable Through Title V Permit
16. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
17. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
18. Accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm<sup>2</sup> per meter (1.0 inch<sup>2</sup> per foot) of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm (1/2 inch). [District Rule 4623 and 40CFR 63.11087(c)] Federally Enforceable Through Title V Permit
19. If the primary seal used is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 61 cm (24 inches) above the stored liquid surface. [District Rule 4623 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit

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20. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623] Federally Enforceable Through Title V Permit
21. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
22. The secondary seal shall allow easy insertion of probes of up to 1-1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
23. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
24. All openings in the roof used for sampling and gauging, except pressure-vacuum relief valve, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623] Federally Enforceable Through Title V Permit
25. The tank shall be in a leak-free condition. The pressure-vacuum relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
26. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation, unless this tank is a part of Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program under section 5.7 of Rule 4623 and complies with all requirements in Table 4 of Rule 4623 for External Floating Roof Tank Preventative Inspection and Maintenance. [District Rule 4623] Federally Enforceable Through Title V Permit
27. Except for automatic bleeder vents, rim vents, and pressure relief vents, each opening in a non-contact external floating roof shall provide a projection below the liquid surface. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
28. Except for automatic bleeder vents and rim vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times (i.e., no visible gap) except when in actual use. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
29. Automatic bleeder vents shall be equipped with a gasket 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 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
30. Rim vents shall be equipped with a gasket and shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
31. Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. The fabric cover must be impermeable if the liquid is drained into the contents of the tanks. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
32. External floating roof legs shall be equipped with vapor socks or vapor barriers in order to maintain a gas-tight condition so as to prevent VOC emissions from escaping through the roof leg opening. [District Rule 4623] Federally Enforceable Through Title V Permit

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33. All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
34. The solid guidepole well shall be equipped with a pole wiper and a gasketed cover, seal or lid which shall be in a closed position at all times (i.e., no visible gap) except when the well is in use. [District Rule 4623] Federally Enforceable Through Title V Permit
35. The gap between the pole wiper and the solid guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
36. The slotted guidepole well on a external floating roof shall be equipped with the following: a sliding cover, a well gasket, a pole sleeve, a pole wiper, and an internal float and float wiper designed to minimize the gap between the float and the well, and provided the gap shall not exceed 1/8 inch; or shall be equipped with a well gasket, a zero gap pole wiper seal and a pole sleeve that projects below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
37. The gap between the pole wiper and the slotted guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed 1/8 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
38. The permittee of external floating roof tanks shall make the primary seal envelope available for unobstructed inspection by the APCO on an annual basis at locations selected along its circumference at random by the APCO. In the case of riveted tanks with toroid-type seals, a minimum of eight locations shall be made available; in all other cases, a minimum of four locations shall be made available. If the APCO suspects a violation may exist the APCO may require such further unobstructed inspection of the primary seal as may be necessary to determine the seal condition for its entire circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
39. Operator shall perform gap measurements on primary and secondary seals within 60 days of the initial fill and at least once every year thereafter to determine compliance with the requirements of Rule 4623. The actual gap measurements of the floating roof primary and secondary seals shall be recorded. The inspection results shall be submitted to the APCO as specified in Section 6.3.5. [District Rule 4623 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
40. Operator shall also perform gap measurements on primary seals during hydrostatic testing of the vessel. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
41. If unit is out of service for a period of one year or more, subsequent refilling with gasoline shall be considered initial fill in accordance with the conditions of this permit. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
42. Operator shall determine gap widths and gap areas for compliance with 40 CFR 60.113b(b)(2) and (3) in the primary and secondary seals using the following procedure: 1) Measure seal gaps, at one or more floating roof levels when the roof is floating off roof leg supports; 2) Measure seal gaps around entire circumference of the tank in each place where a 0.32 cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the tank wall and measure the circumferential distance of each such location; 3) Total surface area of each gap shall be determined by using probes of various widths to accurately measure the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance; and 4) Add the gap surface area of each gap location for the primary seal and the secondary seal individually. Divide the sum for each seal by the nominal diameter of the tank. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
43. If the seals do not meet the required specifications of 40 CFR 60.113b(b)(4)(i) and (ii), operator shall repair or empty the storage vessel within 45 days of identification. [40CFR 63.11087(c)] Federally Enforceable Through Title V Permit
44. Operator shall notify the APCO 30 days in advance of any gap measurements required by 40 CFR 63.11092(e)(2) and 40 CFR 60.113b(b) to afford the APCO opportunity to have an observer present. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

45. After the tank has been emptied and degassed, if the external floating roof has defects, or the primary seal or secondary seal has holes, tears, or other openings in the seal or seal fabric, the operator shall repair the items as necessary so that none of these conditions exist before filling or refilling the storage vessel with gasoline. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
46. For all visual inspections required by 40 CFR 63.11092(e)(2), the operator shall notify the APCO in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the APCO the opportunity to inspect the storage vessel prior to refilling, except when notification is specifically allowed otherwise by this permit. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
47. If a visual inspection required by 40 CFR 63.11092(e)(2) is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall notify the APCO 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 it is received by the APCO at least 7 days prior to the refilling. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
48. Operator shall record the vessel on which the measurement was performed, date of the seal gap measurement, raw data obtained in the measurement process in accordance with the conditions of this permit. [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
49. Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements: the date of measurement, raw data obtained in the measurement process, and all such gap calculations as required by 40 CFR 63.11092(e)(2). [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
50. Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements that exceeded 40 CFR 60.113b(4) limits: the date of measurement, raw data obtained in the measurement process, all such gap calculations as required by 40 CFR 63.11092(e)(2), and the date the vessel was emptied or the repairs made and the date of repair. [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
51. The permittee shall inspect the primary and secondary seals for compliance with the requirements of Rule 4623 every time this tank is emptied or degassed. Actual gap measurements shall be performed when the liquid level is static but not more than 48 hours after the tank roof is re-floated. [District Rule 4623 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
52. The permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
53. The permittee shall maintain the records of the external floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
54. The permittee shall maintain records of the volatile organic liquid stored, the period of storage, and TVP of that volatile organic liquid during the respective storage period. TVP shall be determined using the data on the Reid vapor pressure (highest receipt or highest tank sample results) and actual storage temperature. [District Rule 2201] Federally Enforceable Through Title V Permit
55. The permittee shall maintain records of daily, monthly and annual (12-month rolling total) organic liquid throughput in gallons. [District Rule 2201] Federally Enforceable Through Title V Permit

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56. The permittee shall maintain all records required by this permit for a period of at least five years and shall make them readily available for District inspection upon request. [District Rule 4623 and 40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit

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**Appendix II**  
**Existing Permits to Operate**

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-3-3

EXPIRATION DATE: 01/31/2017

## EQUIPMENT DESCRIPTION:

ONE 630,000 GALLON ABOVEGROUND TANK (TANK #14) STORING GASOLINE, DENATURED ETHANOL, OR DIESEL SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13) DURING GASOLINE AND DENATURED ETHANOL STORAGE

## PERMIT UNIT REQUIREMENTS

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1. The total daily throughput of the organic liquid shall not exceed 1,260,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The total monthly throughput of the organic liquid shall not exceed 10,250,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The total monthly throughput of tanks under permit N-758-3 and '-7 shall not exceed 10,250,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Reid vapor pressure (RVP) of the organic liquid stored in this tank shall not exceed 14.0 psia. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all the VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be maintained in a leak-free condition. Collected vapors shall be directed to a control device capable of reducing at least 95% of VOC emissions (by weight) as determined by the test method specified in this permit. [District Rule 4623 and 40 CFR Part 63.11087(a)] Federally Enforceable Through Title V Permit
6. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
8. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 500 ppmv, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 500 ppmv, above background, is a violation of this permit and shall be reported as a deviation. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623 and 40 CFR Part 63.11087(a)] Federally Enforceable Through Title V Permit
9. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
11. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Source testing to verify compliance with the VOC control efficiency of the vapor recovery system shall be conducted within 120 days of switching fuel from diesel to gasoline or denatured ethanol, or on or before the next source test required by permit N-758-13 (or in most recently issued ATC for N-758-13), whichever is earlier, and annually thereafter while loading this "empty tank" with gasoline (preferably) or denatured ethanol. "Empty tank" in this requirement means a tank with fuel less than or equal to 50% of the maximum storage capacity of the tank. The tank loading rate (gallons/hr) during the testing shall be representative of the loading rate under normal conditions. The loading rate shall be reported in the test report. The test results may be substituted for permit N-758-7-2 instead of performing a separate test. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. The permittee shall establish relevant parameters to ensure on-going compliance with the VOC control efficiency of 95% for the vapor recovery system based on the data gathered during the initial source testing. These parameters may include, but not limited to, vapor flow rate (cfm), activated carbon bed regeneration frequency, or any other similar parameter. These parameters may be administratively included in the Permit to Operate. The established parameters shall be monitored each day during gasoline or denatured ethanol storage. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25A may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. Should the applicant decide to use different methodology, the methodology must be approved by the District prior to its use. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Stack gas velocity or volumetric flow rate shall be determined using EPA Methods 2, 2A, or 2D. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
17. Measurements of a gas-leak concentration from the components in the vapor recovery system shall be determined using EPA Method 21 on a quarterly basis when gasoline or denatured ethanol is stored in the tank. Records of the measurements shall be retained on site. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
18. The permittee shall keep record of the following items on a monthly basis: (a) Month, year; (b) Type of organic liquid stored (denatured ethanol, gasoline, etc.); (c) RVP of the organic liquids stored (psia); (d) Maximum temperature of the liquid in tank (°F); (e) Storage duration (days); (f) Throughput rate (gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
19. The monthly throughput rate may be divided by the storage duration to estimate the daily throughput rate, which shall be used to verify compliance with the permitted daily throughput rate in this permit. Permittee shall record the estimated daily throughput rate at the end of each month for this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR Part 63.11094(a)] Federally Enforceable Through Title V Permit
21. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline and denatured ethanol shall be submitted to the District. [District Rule 2080] Federally Enforceable Through Title V Permit
22. The owner or operator shall keep the following records for the closed vent system and control device: 1) A copy of the operating plan; and 2) A record of the measured values of the parameters monitored in accordance with 40 CFR 60.113b(c)(2). [40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit
23. A log of all breakdowns of the vapor recovery system indicating the times, dates, and gallons processed during the breakdown periods shall be maintained on the premises at all times and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rules 2201 and 4623 and 40 CFR Part 63.11094(a)]  
**Federally Enforceable Through Title V Permit**

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-758-7-3

**EXPIRATION DATE:** 01/31/2017

**EQUIPMENT DESCRIPTION:**

ONE 399,000 GALLON ABOVEGROUND TANK (TANK #17) STORING GASOLINE, DENATURED ETHANOL, OR DIESEL SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13) DURING GASOLINE AND DENATURED ETHANOL STORAGE

## PERMIT UNIT REQUIREMENTS

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1. The total daily throughput of the organic liquid shall not exceed 1,260,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The total monthly throughput of the organic liquid shall not exceed 10,250,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The total monthly throughput of tanks under permit N-758-3 and '7 shall not exceed 10,250,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Reid vapor pressure (RVP) of the organic liquid stored in this tank shall not exceed 14.0 psia. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all the VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be maintained in a leak-free condition. Collected vapors shall be directed to a control device capable of reducing at least 95% of VOC emissions (by weight) as determined by the test method specified in this permit. [District Rule 4623 and 40 CFR Part 63.11087(a)] Federally Enforceable Through Title V Permit
6. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
7. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
8. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 500 ppmv, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 500 ppmv, above background, is a violation of this permit and shall be reported as a deviation. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623 and 40 CFR Part 63.11087(a)] Federally Enforceable Through Title V Permit
9. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
10. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
11. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Source testing to verify compliance with the VOC control efficiency of the vapor recovery system shall be conducted within 120 days of switching fuel from diesel to gasoline or denatured ethanol, or on or before the next source test required by permit N-758-13 (or in most recently issued ATC for N-758-13), whichever is earlier, and annually thereafter while loading this "empty tank" with gasoline (preferably) or denatured ethanol. "Empty tank" in this requirement means a tank with fuel less than or equal to 50% of the maximum storage capacity of the tank. The tank loading rate (gallons/hr) during the testing shall be representative of the loading rate under normal conditions. The loading rate shall be reported in the test report. The test results may be substituted for permit N-758-7-2 instead of performing a separate test. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. The permittee shall establish relevant parameters to ensure on-going compliance with the VOC control efficiency of 95% for the vapor recovery system based on the data gathered during the initial source testing. These parameters may include, but not limited to, vapor flow rate (cfm), activated carbon bed regeneration frequency, or any other similar parameter. These parameters may be administratively included in the Permit to Operate. The established parameters shall be monitored each day during gasoline or denatured ethanol storage. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case EPA Method 25A may be used. EPA Method 18 may be used in lieu of EPA Method 25 or EPA Method 25A provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. Should the applicant decide to use different methodology, the methodology must be approved by the District prior to its use. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
15. Stack gas velocity or volumetric flow rate shall be determined using EPA Methods 2, 2A, or 2D. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
17. Measurements of a gas-leak concentration from the components in the vapor recovery system shall be determined using EPA Method 21 on a quarterly basis when gasoline or denatured ethanol is stored in the tank. Records of the measurements shall be retained on site. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
18. The permittee shall keep record of the following items on a monthly basis: (a) Month, year; (b) Type of organic liquid stored (denatured ethanol, gasoline, etc.); (c) RVP of the organic liquids stored (psia); (d) Maximum temperature of the liquid in tank (°F); (e) Storage duration (days); (f) Throughput rate (gallons). [District Rule 2201] Federally Enforceable Through Title V Permit
19. The monthly throughput rate may be divided by the storage duration to estimate the daily throughput rate, which shall be used to verify compliance with the permitted daily throughput rate in this permit. Permittee shall record the estimated daily throughput rate at the end of each month for this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR Part 63.11094(a)] Federally Enforceable Through Title V Permit
21. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline and denatured ethanol shall be submitted to the District. [District Rule 2080] Federally Enforceable Through Title V Permit
22. The owner or operator shall keep the following records for the closed vent system and control device: 1) A copy of the operating plan; and 2) A record of the measured values of the parameters monitored in accordance with 40 CFR 60.113b(c)(2). [40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit
23. A log of all breakdowns of the vapor recovery system indicating the times, dates, and gallons processed during the breakdown periods shall be maintained on the premises at all times and shall be made available for District inspection upon request. [District Rule 2080] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

24. The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rules 2201 and 4623 and 40 CFR Part 63.11094(a)]  
Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-11-2

EXPIRATION DATE: 01/31/2017

**EQUIPMENT DESCRIPTION:**

BULK OFF-LOADING OPERATION UTILIZED FOR GASOLINE OR ETHANOL OFF-LOADING (RECEIVING) LOCATED AT TRUCK LOADING LANE #3.

## PERMIT UNIT REQUIREMENTS

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1. Off-loading and vapor collection system shall be maintained and operated such that there are no liquid component leaks. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Vapor return line vents on tanker truck storage vessels shall be open only during the off-loading (receiving) operation and shall be closed immediately upon completion of any organic liquid off-loading (receiving). [District Rule 2201] Federally Enforceable Through Title V Permit
3. Tanker truck hatches shall be closed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The off-loading (receiving) equipment shall not be used for the loading of tanker trucks. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall not off-load (receive) any organic liquids with True Vapor Pressure greater than 11 psia. [District Rule 2201] Federally Enforceable Through Title V Permit
6. There shall be no more than 10 tanker trucks off-loaded (received) in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Total liquid drainage and leaks from all hose disconnects during the off-loading (receiving) operation shall not exceed 20 ml per tanker truck off-loaded (received). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The permittee shall maintain a daily record of the quantity of tanker trucks off-loaded (received), the type of liquid off-loaded (received), and the quantity of liquid off-loaded (received) in gallons. [District Rule 1070] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-14-4

EXPIRATION DATE: 01/31/2017

## EQUIPMENT DESCRIPTION:

ONE 689,136 GALLON (16,408 BBL) ABOVEGROUND WELDED EXTERNAL FLOATING ROOF  
GASOLINE/DENATURED ETHANOL/DIESEL STORAGE TANK (TANK #18) WITH A MECHANICAL SHOE TYPE  
PRIMARY SEAL AND A SECONDARY WIPER SEAL

## PERMIT UNIT REQUIREMENTS

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1. VOC emissions from this tank shall not exceed 28.9 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. VOC emissions from this tank shall not exceed 6,707 pounds in any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit. These records shall contain each process variable used (e.g., throughput, RVP, etc.) in estimating VOC emissions from this tank and actual process variables (e.g. throughput, RVP, etc.) of this tank. The process variables used in estimating the emissions shall be compared to that of the actual process variables to demonstrate compliance with each emission limit. The permittee may also use EPA's Tanks program (or other District accepted methodologies) with actual process variables to demonstrate compliance with each emission limit. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fugitive VOC from valves, flanges, connector, pump seals etc., associated with this tank shall not exceed any of the following limits: 0.2 lb/day and 55 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fugitive VOC emissions from component leaks shall be calculated using component count and appropriate emission factors from "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-1b (Feb 1999) - Marketing Terminal. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Throughput of organic liquid for this tank shall not exceed any of the following limits: 698,136 gallons/day, 20,961,220 gallons/month and 50,952,827 gallons/year based on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. True vapor pressure (TVP) of the liquid stored in this tank shall be less than 11 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
8. The owner or operator shall determine RVP and the temperature of the organic liquid (except diesel) stored on monthly basis. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. This tank shall be equipped with a closure device between the tank shell and roof edge consisting of two seals mounted one above the other; the one below shall be referred to as the primary seal, and the one above shall be referred as the secondary seal. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. The external floating roof shall float on the surface of the stored liquid at all times (i.e., off the roof leg supports) except during the initial fill until the roof is lifted off the leg supports and when the tank is completely emptied and subsequently 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. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five calendar days prior to performing the work. The tank must be in compliance with this rule before it may land on its legs. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
11. Gaps between the tank shell and the primary seal shall not exceed 1-1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
12. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
13. Accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm<sup>2</sup> per meter (10.01 in<sup>2</sup> per foot) of tank diameter, and the width of any gap shall not exceed 3.81 cm (1.5 inches). [40CFR 63.11087(c)] Federally Enforceable Through Title V Permit
14. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
15. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
16. Accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm<sup>2</sup> per meter (1.0 inch<sup>2</sup> per foot) of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm (1/2 inch). [District Rule 4623 and 40CFR 63.11087(c)] Federally Enforceable Through Title V Permit
17. If the primary seal used is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 61 cm (24 inches) above the stored liquid surface. [District Rule 4623 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
18. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623] Federally Enforceable Through Title V Permit
19. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
20. The secondary seal shall allow easy insertion of probes of up to 1-1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
21. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
22. All openings in the roof used for sampling and gauging, except pressure-vacuum relief valve, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623] Federally Enforceable Through Title V Permit
23. The tank shall be in a leak-free condition. The pressure-vacuum relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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24. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation, unless this tank is a part of Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program under section 5.7 of Rule 4623 and complies with all requirements in Table 4 of Rule 4623 for External Floating Roof Tank Preventative Inspection and Maintenance. [District Rule 4623] Federally Enforceable Through Title V Permit
25. Except for automatic bleeder vents, rim vents, and pressure relief vents, each opening in a non-contact external floating roof shall provide a projection below the liquid surface. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
26. Except for automatic bleeder vents and rim vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times (i.e., no visible gap) except when in actual use. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
27. Automatic bleeder vents shall be equipped with a gasket 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 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
28. Rim vents shall be equipped with a gasket and shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
29. Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. The fabric cover must be impermeable if the liquid is drained into the contents of the tanks. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
30. External floating roof legs shall be equipped with vapor socks or vapor barriers in order to maintain a gas-tight condition so as to prevent VOC emissions from escaping through the roof leg opening. [District Rule 4623] Federally Enforceable Through Title V Permit
31. All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
32. The solid guidepole well shall be equipped with a pole wiper and a gasketed cover, seal or lid which shall be in a closed position at all times (i.e., no visible gap) except when the well is in use. [District Rule 4623] Federally Enforceable Through Title V Permit
33. The gap between the pole wiper and the solid guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
34. The slotted guidepole well on a external floating roof shall be equipped with the following: a sliding cover, a well gasket, a pole sleeve, a pole wiper, and an internal float and float wiper designed to minimize the gap between the float and the well, and provided the gap shall not exceed 1/8 inch; or shall be equipped with a well gasket, a zero gap pole wiper seal and a pole sleeve that projects below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
35. The gap between the pole wiper and the slotted guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed 1/8 inch. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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36. The permittee of external floating roof tanks shall make the primary seal envelope available for unobstructed inspection by the APCO on an annual basis at locations selected along its circumference at random by the APCO. In the case of riveted tanks with toroid-type seals, a minimum of eight locations shall be made available; in all other cases, a minimum of four locations shall be made available. If the APCO suspects a violation may exist the APCO may require such further unobstructed inspection of the primary seal as may be necessary to determine the seal condition for its entire circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
37. Operator shall perform gap measurements on primary and secondary seals within 60 days of the initial fill and at least once every year thereafter to determine compliance with the requirements of Rule 4623. The actual gap measurements of the floating roof primary and secondary seals shall be recorded. The inspection results shall be submitted to the APCO as specified in Section 6.3.5. [District Rule 4623 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
38. Operator shall also perform gap measurements on primary seals during hydrostatic testing of the vessel. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
39. If unit is out of service for a period of one year or more, subsequent refilling with gasoline shall be considered initial fill in accordance with the conditions of this permit. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
40. Operator shall determine gap widths and gap areas for compliance with 40 CFR 60.113b(b)(2) and (3) in the primary and secondary seals using the following procedure: 1) Measure seal gaps, at one or more floating roof levels when the roof is floating off roof leg supports; 2) Measure seal gaps around entire circumference of the tank in each place where a 0.32 cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the tank wall and measure the circumferential distance of each such location; 3) Total surface area of each gap shall be determined by using probes of various widths to accurately measure the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance; and 4) Add the gap surface area of each gap location for the primary seal and the secondary seal individually. Divide the sum for each seal by the nominal diameter of the tank. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
41. If the seals do not meet the required specifications of 40 CFR 60.113b(b)(4)(i) and (ii), operator shall repair or empty the storage vessel within 45 days of identification. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
42. Operator shall notify the APCO 30 days in advance of any gap measurements required by 40 CFR 63.11092(e)(2) and 40 CFR 60.113b(b) to afford the APCO opportunity to have an observer present. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
43. After the tank has been emptied and degassed, if the external floating roof has defects, or the primary seal or secondary seal has holes, tears, or other openings in the seal or seal fabric, the operator shall repair the items as necessary so that none of these conditions exist before filling or refilling the storage vessel with gasoline. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
44. For all visual inspections required by 40 CFR 63.11092(e)(2), the operator shall notify the APCO in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the APCO the opportunity to inspect the storage vessel prior to refilling, except when notification is specifically allowed otherwise by this permit. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
45. If a visual inspection required by 40 CFR 63.11092(e)(2) is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall notify the APCO 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 it is received by the APCO at least 7 days prior to the refilling. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
46. Operator shall record the vessel on which the measurement was performed, date of the seal gap measurement, raw data obtained in the measurement process in accordance with the conditions of this permit. [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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47. Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements: the date of measurement, raw data obtained in the measurement process, and all such gap calculations as required by 40 CFR 63.11092(c)(2). [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
48. Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements that exceeded 40 CFR 60.113b(4) limits: the date of measurement, raw data obtained in the measurement process, all such gap calculations as required by 40 CFR 63.11092(e)(2), and the date the vessel was emptied or the repairs made and the date of repair. [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
49. The permittee shall inspect the primary and secondary seals for compliance with the requirements of Rule 4623 every time this tank is emptied or degassed. Actual gap measurements shall be performed when the liquid level is static but not more than 48 hours after the tank roof is re-floated. [District Rule 4623 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
50. The permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
51. The permittee shall maintain the records of the external floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
52. The permittee shall maintain records of the volatile organic liquid stored, the period of storage, and TVP of that volatile organic liquid during the respective storage period. TVP shall be determined using the data on the Reid vapor pressure (highest receipt or highest tank sample results) and actual storage temperature. [District Rule 2201] Federally Enforceable Through Title V Permit
53. The permittee shall maintain records of daily, monthly and annual (12-month rolling total) organic liquid throughput in gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
54. The permittee shall maintain all records required by this permit for a period of at least five years and shall make them readily available for District inspection upon request. [District Rule 4623 and 40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

**Appendix III**  
**Risk Management Review Summary**

## San Joaquin Valley Air Pollution Control District Risk Management Review

To: Jag Kahlon – Permit Services  
 From: Cheryl Lawler – Technical Services  
 Date: September 11, 2015  
 Facility Name: Equilon Enterprises LLC  
 Location: 3515 Navy Drive, Stockton  
 Application #(s): N-758-3-4, 7-4, 11-3, 14-5  
 Project #: N-1151912

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### A. RMR SUMMARY

RMR Summary			
Categories	Bulk Off-Loading Operation (Unit 11-3)	Project Totals	Facility Totals
Prioritization Score	0.73	0.73	>1.0
Acute Hazard Index	0.00	0.00	0.00
Chronic Hazard Index	0.00	0.00	0.00
Maximum Individual Cancer Risk (10 <sup>-6</sup> )	0.03	0.03	4.28
T-BACT Required?	No		
Special Permit Conditions?	No		

### B. RMR REPORT

#### I. Project Description

Technical Services received a request on September 2, 2015, to perform a Risk Management Review (RMR) for the modification of a bulk off-loading operation. The modification will require additional components such as valves, flanges, connectors, etc., which will result in fugitive VOC emissions. For conservative estimates, all additional components are assumed to be in VOC service.

For Units 3-2, 7-4, & 14-4, there are no hourly or annual emission increases. Therefore, no RMR analysis is required for these units.

#### II. Analysis

Technical Services performed a prioritization using the District's SHARP database. Since the total facility prioritization score was greater than one, a refined health risk assessment was required. Emissions calculated using emission factors based on the 1995 District memo "Toxic Emissions Inventory Plan Regarding Diesel and Gasoline Storage Weight Fractions" were input into the SHARP database. The AERMOD model was used, with the

parameters outlined below and meteorological data for 2009-2013 from Stockton to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid. These dispersion factors were input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP) and the Air Dispersion Modeling and Risk Tool (ADMRT) of the Hot Spots Analysis and Reporting Program Version 2 (HARP 2) to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Analysis Parameters			
Source Type	Area	Location Type	Urban
Area Size (m)	15.24 x 7.62	Closest Receptor (m)	67.06
Area Release Height (m)	1.22	Type of Receptor	Business
Unit 11-3 Increased VOC Emission Rates (lbs)	0.0042 hr 37 yr		

### III. Conclusions

The Acute and Chronic Indices are below 1.0, and the Cancer Risk factor associated with the project is less than 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

### Attachments

RMR Request Form  
Additional Project Location Information  
Fugitive Emissions Speciation Worksheet  
Prioritization  
Facility Summary

**Appendix IV**  
**Compliance Certification Form**

RECEIVED

OCT 15 2015

SJVAPCD  
NORTHERN REGION

San Joaquin Valley  
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION
- MINOR PERMIT MODIFICATION
- ADMINISTRATIVE AMENDMENT

COMPANY NAME: Equilon Enterprises, LLC dba Shell Oil Products US	FACILITY ID: N- 758
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

H. Theoret  
Signature of Responsible Official

May 27<sup>th</sup> 2015  
Date

**Helen Theoret**

Name of Responsible Official (please print)

**General Manager, Shell Trading & Supply Operations**

Title of Responsible Official (please print)