



**MAR 05 2014**

Mr. Stephan Rosen  
NuStar Terminal Ops Partnership LP  
90 San Pablo Ave  
Crockett CA 94525

**Re Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # N-829  
Project # N-1133454**

Dear Mr. Rosen

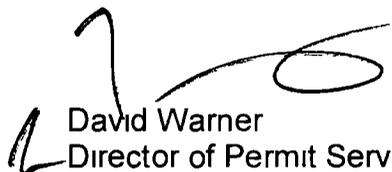
Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The facility proposes to modify the start-up procedure and the fuel type.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
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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Bakersfield, CA 93308 9725  
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# Authority to Construct Application Review

Vapor Combustor Serving a Loading Rack

Facility Name	NuStar Terminals Ops Partnership LP	Date	January 15, 2014
Mailing Address	90 San Pablo Ave Crockett, CA 94525	Engineer	Jesse A Garcia
		Lead Engineer	Joven Refuerzo
Contact Person	Stephan Rosen		
Telephone	(925) 580-5800		
E-Mail	Stephan.rosen@nustarenergy.com		
Application #(s)	N-829-20-8		
Project #	N-1133454		
Deemed Complete	November 25 2013		

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## I Proposal

NuStar Terminals Ops Partnership LP (NuStar) currently operates a bulk loading operation with a permit for a vapor recovery system to control VOCs from loading racks (Permits N-829-1 and N-829-2). The current Permit to Operate requires that the vapor combustor be preheated while operating on natural gas fuel prior to introducing the contaminated airstream. The applicant is now proposing to receive an ATC to remove the preheating requirement, allow use of propane instead of natural gas for assist fuel, and allow the unit to start up solely on gasoline vapors or a combination of gasoline vapors and propane.

NuStar Terminals Ops Partnership LP has received their Title V Permit. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. NuStar must apply to administratively amend their Title V permit.

## II Applicable Rules

2201 New and Modified Stationary Source Review Rule (4/21/11)  
2410 Prevention of Significant Deterioration (6/16/11)  
2520 Federally Mandated Operating Permits (6/21/01)  
4001 New Source Performance Standards (4/14/99)  
4002 National Emission Standards for Hazardous Air Pollutants (5/20/04)  
4101 Visible Emissions (11/15/01)  
4102 Nuisance (12/17/92)  
4301 Fuel Burning Equipment (12/17/92)  
4311 Flares (6/15/06)  
4624 Transfer of Organic Liquid (12/20/07)  
4801 Sulfur Compounds (12/17/92)  
CH&SC 41700 and CH&SC 42301 6

### III Project Location

The facility is located at 2941 Navy Drive in Stockton CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

### IV Process Description

During the operation of the loading racks operating under permits N-829-1 and N-829-2, VOCs will be generated. These VOCs will be ducted to a vapor storage tank where they will remain until the tank becomes full. Once the storage tank becomes full, the vapor combustor will be purged using the air-assist blower to clear away any combustibles. The purge will be immediately followed by pilot ignition. Following pilot ignition, the combustibles from the storage tanks will be fed into the vapor combustor where they will be ignited by the pilot and burned. An air-assist blower will provide both combustion air and the mixing required to ensure smokeless combustion. Per the vapor combustor manufacturer, at least 99% VOC destruction will be achieved.

The proposal to remove the preheating requirements is approvable as the combustor has demonstrated on several source tests to be able to achieve a VOC destruction efficiency greater than the minimum 99% during normal operation, therefore, when calculating overall VOC destruction efficiency (including the vapors combusted during the preheating phase), the current permitted minimum of 99% destruction efficiency is still able to be achieved.

### V Equipment Listing

#### Pre-Project Equipment Description

N-829-20-7 VAPOR RECOVERY SYSTEM CONSISTING OF A 300,000 GALLON VAPOR HOLDING TANK, A VAPOR PROCESSING AND CONVEYING SYSTEM, AND A 40 MMBTU/HR NATURAL GAS FIRED JOHN ZINK ZCT-2-8-35-X-2/8-X VAPOR COMBUSTOR.

#### Proposed Modification

N-829-20-8 MODIFICATION OF VAPOR RECOVERY SYSTEM CONSISTING OF A 300,000 GALLON VAPOR HOLDING TANK, A VAPOR PROCESSING AND CONVEYING SYSTEM, AND A 40 MMBTU/HR NATURAL GAS FIRED JOHN ZINK ZCT-2-8-35-X-2/8-X VAPOR COMBUSTOR. REMOVE PREHEATING REQUIREMENT AND CHANGE THE ASSIST FUEL FROM NATURAL GAS TO PROPANE.

#### Post-Project Equipment Description

N-829-20-7 VAPOR RECOVERY SYSTEM CONSISTING OF A 300,000 GALLON VAPOR HOLDING TANK, A VAPOR PROCESSING AND CONVEYING SYSTEM, AND A 40 MMBTU/HR PROPANE FIRED JOHN ZINK ZCT-2-8-35-X-2/8-X VAPOR COMBUSTOR.

## VI Emission Control Technology Evaluation

The organic vapors contained in the storage tanks will be ducted to the proposed propane-fired vapor combustor where they will be oxidized. Per the vapor combustor manufacturer, the oxidation process will result in at least 99% VOC destruction.

The vapor combustor will be equipped with an air-assist blower that will provide combustion air and mixing energy. The combustion air and the mixing provided by the air-assist blower will result in smokeless combustion (PM control).

## VII General Calculations

### A Assumptions

Pre and Post Project Daily Throughput = 2,071,233 gal/day (Permit N-829-20-7 – no change proposed)

Pre and Post Project Annual Throughput = 756,000,000 gal/day (Permit N-829-20-7 – no change proposed)

### B Emission Factors

#### Premodification Emission Factors

NO<sub>x</sub> 0.0334 lb/1,000 gal (application review document for project N-1082080)  
CO 0.0825 lb/1,000 gal (application review document for project N-1082080)  
VOC 0.08 lb/1,000 gal (current PTO limit, no change proposed)  
SO<sub>x</sub> 0.00036 lb/1,000 gal (application review document for project N-1082080)  
PM<sub>10</sub> 0.00095 lb/1,000 gal (application review document for project N-1082080)

#### Postmodification Emission Factors

There will not be a change in the method of incinerating the organic vapors, therefore the pre and post modification emission factors are expected to be the same.

### C Calculations

#### 1 Pre-Project Potential to Emit (PE1)

##### Daily PE

PE<sub>NO<sub>x</sub></sub> (0.0334 lb/1,000 gal)(2,071,233 gal/day) = 69.2 lb/day  
PE<sub>CO</sub> (0.0825 lb/1,000 gal)(2,071,233 gal/day) = 170.9 lb/day  
PE<sub>VOC</sub> (0.08 lb/1,000 gal)(2,071,233 gal/day) = 165.7 lb/day  
PE<sub>SO<sub>x</sub></sub> (0.00036 lb/1,000 gal)(2,071,233 gal/day) = 0.7 lb/day  
PE<sub>PM<sub>10</sub></sub> (0.00095 lb/1,000 gal)(2,071,233 gal/day) = 2.0 lb/day

## Annual PE

$$\begin{aligned} PE_{NOx} & (0.0334 \text{ lb/1,000 gal})(756,000,000 \text{ gal/yr}) = 25,250 \text{ lb/yr} \\ PE_{CO} & (0.0825 \text{ lb/1,000 gal})(756,000,000 \text{ gal/yr}) = 62,370 \text{ lb/yr} \\ PE_{VOC} & (0.08 \text{ lb/1,000 gal})(756,000,000 \text{ gal/yr}) = 60,480 \text{ lb/yr} \\ PE_{SOx} & (0.00036 \text{ lb/1,000 gal})(756,000,000 \text{ gal/yr}) = 272 \text{ lb/yr} \\ PE_{PM10} & (0.00095 \text{ lb/1,000 gal})(756,000,000 \text{ gal/yr}) = 718 \text{ lb/yr} \end{aligned}$$

## 2 Post Project Potential to Emit (PE2)

Since there is no changes proposed in emission factors or throughput PE2 = PE1, therefore

### Daily PE

$$\begin{aligned} PE_{NOx} & (0.0334 \text{ lb/1,000 gal})(2,071,233 \text{ gal/day}) = 69.2 \text{ lb/day} \\ PE_{CO} & (0.0825 \text{ lb/1,000 gal})(2,071,233 \text{ gal/day}) = 170.9 \text{ lb/day} \\ PE_{VOC} & (0.08 \text{ lb/1,000 gal})(2,071,233 \text{ gal/day}) = 165.7 \text{ lb/day} \\ PE_{SOx} & (0.0051 \text{ lb/1,000 gal})(2,071,233 \text{ gal/day}) = 0.7 \text{ lb/day} \\ PE_{PM10} & (0.00095 \text{ lb/1,000 gal})(2,071,233 \text{ gal/day}) = 2.0 \text{ lb/day} \end{aligned}$$

### Annual PE

$$\begin{aligned} PE_{NOx} & (0.0334 \text{ lb/1,000 gal})(756,000,000 \text{ gal/yr}) = 25,250 \text{ lb/yr} \\ PE_{CO} & (0.0825 \text{ lb/1,000 gal})(756,000,000 \text{ gal/yr}) = 62,370 \text{ lb/yr} \\ PE_{VOC} & (0.08 \text{ lb/1,000 gal})(756,000,000 \text{ gal/yr}) = 60,480 \text{ lb/yr} \\ PE_{SOx} & (0.00036 \text{ lb/1,000 gal})(756,000,000 \text{ gal/yr}) = 272 \text{ lb/yr} \\ PE_{PM10} & (0.00095 \text{ lb/1,000 gal})(756,000,000 \text{ gal/yr}) = 718 \text{ lb/yr} \end{aligned}$$

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

Pursuant to District Rule 2201 the SSPE1 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 (AER) that have occurred at the source and which have not been used on-site

The SSPE1 is taken from Project N-1082080 unless otherwise noted and summarized below

Permit Number	SSPE1 (lb/yr)				
	NOx	CO	VOC	SOx	PM10
N-829-1-6	0	0	0	0	0
N-829-2-6	0	0	0	0	0
N-829-5-3	0	0	4,613	0	0
N-829-6-6	0	0	4 158	0	0
N-829-7-5	0	0	4 161	0	0
N-829-16-6	0	0	5,184	0	0
N-829-17-6	0	0	4 639	0	0
N-829-18-6	0	0	4 639	0	0
N-829-20-7	25,250	62 370	60,480	272	718
N-829-21-4	0	0	7,662	0	0
N-829-22-4	0	0	6,004	0	0
N-829-28-5	0	0	9,777	0	0
N-829-29-5	0	0	9,777	0	0
N-829-31-4	0	0	1 236	0	0
N-829-32-0	0	0	2 543	0	0
N-829-33-0	0	0	3 754	0	0
N-829-34-0	0	0	544	0	0
N-829-35-0	0	0	1,168	0	0
ERC's	0	0	0	0	0
<b>Total</b>	<b>25,250</b>	<b>62,370</b>	<b>130,339</b>	<b>272</b>	<b>718</b>

N-829-31-4 Application Review document for Project N-1091826

N-829-35-0 Application Review document for Project N-1091343

#### 4 Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201 the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site

Permit Number	SSPE2 (lb/yr)				
	NOx	CO	VOC	SOx	PM10
N-829-1-6	0	0	0	0	0
N-829-2-6	0	0	0	0	0
N-829-5-3	0	0	4,613	0	0
N-829-6-6	0	0	4,158	0	0
N-829-7-5	0	0	4,161	0	0
N-829-16-6	0	0	5,184	0	0
N-829-17-6	0	0	4,639	0	0
N-829-18-6	0	0	4,639	0	0
N-829-20-8	25,250	62,370	60,480	272	718
N-829-21-4	0	0	7,662	0	0
N-829-22-4	0	0	6,004	0	0
N-829-28-5	0	0	9,777	0	0
N-829-29-5	0	0	9,777	0	0
N-829-31-4	0	0	1,236	0	0
ATC N-829-32-0	0	0	2,543	0	0
ATC N-829-33-0	0	0	3,754	0	0
ATC N-829-34-0	0	0	544	0	0
ATC N-829-35-0	0	0	1,168	0	0
ERC's	0	0	0	0	0
<b>Total</b>	<b>25,250</b>	<b>62,370</b>	<b>130,339</b>	<b>272</b>	<b>718</b>

#### 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 51.165

<b>Rule 2201 Major Source Determination (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
SSPE1	25 250	272	718	62 370	130 339
SSPE2	25 250	272	718	62,370	130,339
Major Source Threshold	20 000	140 000	140 000	200 000	20 000
Major Source?	Yes	No	No	No	Yes

As seen in the table above, the facility is an existing Major Source for NO<sub>x</sub> and VOC and will continue to be a major source for NO<sub>x</sub> and VOC

**Rule 2410 Major Source Determination**

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

<b>PSD Major Source Determination (tons/year)</b>							
	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>	CO <sub>2e</sub>
Estimated Facility PE before Project Increase	12 6	65 2	0 2	0 4	31 2	31 2	4 953 <sup>1</sup>
PSD Major Source Thresholds	250	250	250	250	250	250	100 000
PSD Major Source ? (Y/N)	N	N	N	N	N	N	N

As shown above the facility is not an existing major source for PSD for at least one pollutant Therefore the facility is not an existing major source for PSD

<sup>1</sup> The unit under consideration is the only permitted fuel burning equipment at the facility The unit burns gasoline vapors generated at the loading racks therefore

- EF<sub>GHG</sub> (gasoline) 154 lb CO<sub>2e</sub>/MMBtu (AP-42 3 3 1 10/1996)
- Waste Generation Rate 4 038 lb-gasoline/1 000 gallons transferred (applicant)
- Maximum Transfer Rate 756 000 000 gal/yr (Permit to Operate)
- Density of Gasoline 6 17 lb/gal
- Heating Value of Gasoline 130 000 Btu/gal

$$PE_{CO_2e} = (4 038 \text{ lb} / 1000 \text{ gal})(\text{gal}/6 17 \text{ lb})(756 000 000 \text{ gal/yr}) \times (0 130 \text{ MMBtu/gal})$$

$$(154 \text{ lb CO}_2\text{e/MMBtu})(\text{ton}/2000 \text{ lb}) = 4 953 \text{ tons/yr}$$

## **6 Baseline Emissions (BE)**

The BE calculation (in lbs/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC and if applicable, to determine the amount of offsets required

Pursuant to District Rule 2201, BE = 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

### **CO, SOx and PM10**

The facility is a non-Major Source for CO SOx and PM10 Per Rule 2201 the Baseline Emissions for non-Major Source pollutants are equal to the pre-project potential to emit of those pollutants

### **VOC**

Although the vapor control device was given its own permit it is not an emission unit Rather the two organic liquid loading operations served by this vapor control device are the emission units They are served by the vapor control device currently under consideration and that unit provides at least 95% VOC control efficiency Therefore the organic liquid loading operations are Clean Emission Units as defined in section 3 13 of Rule 2201 Per section 3 8 the baseline emissions for such units are equal to the pre-project potential to emit

### **NOx**

The emissions unit (organic loading operations) is equipped with an emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application The emissions unit is equipped with a natural gas or LPG fired pilot and air assist as required by BACT Guideline 7 1 10 See Appendix F

From section VII C 1 of this document, the pre-project potential to emit of NOx, CO, SOx, PM10 and VOC are

NOx (lb/yr)	CO (lb/yr)	SOx (lb/yr)	PM10 (lb/yr)	VOC (lb/yr)
25 250	62 370	272	718	60,480

**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 "

The facility is not a major source for SOx or PM10, however since this facility is a major source for NOx and VOC, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NO <sub>x</sub>	25,250	50 000	No
VOC	60 480	50 000	Yes

Since the project's PE2 surpasses the SB 288 Major Modification Thresholds for VOC, the Net Emissions Increase (NEI) will be compared to the SB 288 Major Modification thresholds in order to determine if this project constitutes an SB 288 Major Modification

The NEI is the total of emission increases for every permit unit addressed in this project and is calculated as follows

$$NEI = PE2 - BAE$$

Where PE2 = the sum of all the PE2s for each permit unit in this project  
 BAE = for units that are fully offset, the BAE = the PE1 for every unit, otherwise, the BAE is the actual annual emissions averaged over the baseline period for every unit

The baseline period is the two year period preceding the application (or another time period within the previous 5 or 10 yrs determined by the District to be more representative of normal operation. The District has selected the 24 complete calendar months immediately preceding the application date as the baseline period for determining the Baseline Actual Emissions (BAE). Those throughputs associated with that period were provided (See Appendix D) by the applicant and are shown in the table below

Calendar Year	Baseline Period Throughput (gal)
2011 (Q4)	57 561 284
2012	338 479 921
2013 (Q1 Q2 Q3)	240 879 392
2 yr total (gal)	636 920 597
2 yr Average (gal)	318 460 299

$EF_{VOC} = 0.08 \text{ lb/1,000 gal}$

Baseline Period Throughput = 318,460,299 gal

$$BAE_{VOC} = (318,460,299 \text{ gal})(0.08 \text{ lb/1000 gal}) = 19,108 \text{ lb/yr}$$

**Net Emission Increase (NEI) Calculations**

The table below shows the Baseline Actual Emissions (BAE) and the postmodification potentials to emit (PE2) of the units in this project, as well as the Net Emission Increase (NEI) and whether or not an SB-288 Major Modification is triggered

Pollutant	PE2 (lb/yr)	BAE (lb/yr)	NEI (lb/yr)	SB-288 Major Modification
VOC	60,480	19,108	41,372	No

This permitting action 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

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

**Step 1**

For new emissions units, the increase in emissions is equal to the PE2 for each new unit included in this project.

For existing emissions units, the increase in emissions is calculated as follows:

$$\text{Emission Increase} = PAE - BAE - UBC$$

Where  
 PAE = Projected Actual Emissions and  
 BAE = Baseline Actual Emissions  
 UBC = Unused baseline capacity

If there is no increase in design capacity or potential to emit, the PAE is equal to the annual emission rate at which the unit is projected to emit in any one year selected by the operator within 5 years after the unit resumes normal operation. If detailed PAE are not provided, the PAE is equal to the PE2 for each permit unit.

The BAE is calculated based on historical emissions and operating records for any 24-month period, selected by the operator within the previous 10-year period. The BAE

must be adjusted to exclude any non-compliant operation emissions and emissions that are no longer allowed due to lower applicable emission limits that were in effect when this application was deemed complete

UBC Since this project does not result in an increase in design capacity or potential to emit and it does not impact the ability of the emission unit to operate at a higher utilization rate the UBC is the portion of PAE that the emission units could have accommodated during the baseline period

UBC = PE1 – BAE therefore

$$\begin{aligned} EI &= PE2 - BAE - (PE1 - BAE) \\ &= PE2 - BAE - PE1 + BAE \\ &= PE2 - PE1 \end{aligned}$$

As shown in section VII C of this document, PE2 will not exceed PE1 for either pollutant Therefore this permitting action is not a Federal Major Modification

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

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants The pollutants addressed in the PSD applicability determination are listed as follows

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM10
- Greenhouse gases (GHG) CO2, N2O CH4, HFCs PFCs, and SF6

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII C 5 of this document)

In the case the facility is an existing PSD Major Source, the second step of the PSD evaluation is to determine if the project results in a PSD significant increase

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

In the case the facility is new source the second step of the PSD evaluation is to determine if this new facility will become a new PSD major Source as a result of the project and if so, to determine which pollutant will result in a PSD significant increase

**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

PSD Major Source Determination Potential to Emit (tons/year)							
	NO2	VOC	SO2	CO	PM	PM10	CO2e
Total PE from New and Modified Units	12.6	30.2	0.2	31.2	0.4	0.4	4,953 <sup>2</sup>
PSD Major Source threshold	250	250	250	250	250	250	100,000
New PSD Major Source?	N	N	N	N	N	N	N

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

IPE <sub>NOx</sub>	25,250 lb/yr – 25,250 lb/yr = 0 lb/yr (0 lb/qtr)
IPE <sub>CO</sub>	62,370 lb/yr – 62,370 lb/yr = 0 lb/yr (0 lb/qtr)
IPE <sub>VOC</sub>	60,480 lb/yr – 60,480 lb/yr = 0 lb/yr (0 lb/qtr)
IPE <sub>SOx</sub>	272 lb/yr – 272 lb/yr = 0 lb/yr (0 lb/qtr)
IPE <sub>PM10</sub>	718 lb/yr – 718 lb/yr = 0 lb/yr (0 lb/qtr)

The emission profile for this ATC will include the following

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	25,250	272	718	62,370	60,480
Δ PE (Qtr 1)	0	0	0	0	0
Δ PE (Qtr 2)	0	0	0	0	0
Δ PE (Qtr 3)	0	0	0	0	0
Δ PE (Qtr 4)	0	0	0	0	0

<sup>2</sup> Taken from Section VII C 5

## VIII Compliance

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

#### A Best Available Control Technology (BACT)

##### 1 BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions\*

- a Any new emissions unit with a potential to emit exceeding two pounds per day
- b The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day
- c Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d 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 by the 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

##### a New emissions units – PE > 2 lb/day

As discussed in Section I above, there are no new emissions units associated with this project. Therefore, BACT for new units with PE > 2 lb/day purposes is not triggered.

##### b Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore, BACT is not triggered.

##### c Modification of emissions units – AIPE > 2 lb/day

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

Where

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE2 = Post-Project Potential to Emit (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

Where

PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)

EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1.

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation.

$$AIPE = PE2 - (PE1 * (EF2 / EF1))$$

Since the PE2 = PE1 and EF2 = EF1 for all pollutants, the AIPE = 0.0 lb/day for all pollutants. Therefore BACT is not triggered.

**d SB 288/Federal Major Modification**

As discussed in Sections VII C 7 and VII C 8 above, this project does not constitute an SB 288 or Federal Major Modification. Therefore BACT is not triggered for any pollutant.

**B Offsets**

**1 Offset Applicability**

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table:

Offset Determination (lb/year)					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
SSPE2	25,250	272	718	62,370	130,339
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	Y	N	N	N	Y

**2 Quantity of Offsets Required**

As seen above, the facility is an existing Major Source for NO<sub>x</sub> and VOC and the SSPE2 is greater than the offset thresholds. Therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for NO<sub>x</sub> and VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated:

$$\text{Offsets Required (lb/year)} = (\sum[PE2 - BE] + ICCE) \times DOR, \text{ for all new or modified emissions units in the project,}$$

Where,

PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions (lb/year)  
ICCE = Increase in Cargo Carrier Emissions (lb/year)  
DOR = Distance Offset Ratio determined pursuant to Section 4.8

BE = 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 = HAE

As calculated in Section VII C 6 above, the BE from this unit are equal to the PE1

Also, there is only one emissions unit associated with this project and there are no increases in cargo carrier emissions. Therefore offsets can be determined as follows:

Offsets Required (lb/year) =  $([PE2 - BE] + ICCE) \times DOR$

PE2 (NO<sub>x</sub>) = 25,250 lb/year  
BE (NO<sub>x</sub>) = 25,250 lb/year  
ICCE = 0 lb/year

Offsets Required (lb/year) =  $([25,250 - 25,250] + 0) \times DOR$   
= 0 lb NO<sub>x</sub>/year

PE2 (VOC) = 130,339 lb/year  
BE (VOC) = 130,339 lb/year  
ICCE = 0 lb/year

Offsets Required (lb/year) =  $([130,339 - 130,339] + 0) \times DOR$   
= 0 lb VOC/year

As demonstrated in the calculation above, the amount of offsets is zero. Therefore, offsets will not be required for this project.

## C Public Notification

### 1 Applicability

Public noticing is required for

- a New Major Sources, Federal Major Modifications, and SB 288 Major Modifications
- b Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c Any project which results in the offset thresholds being surpassed, and/or

d Any project with an SSIPE of greater than 20 000 lb/year for any pollutant

**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 is not a new facility public noticing is not required for this project for New Major Source purposes

As demonstrated in Sections VII C 7 and VII C 8 this project does not constitute an SB 288 or Federal Major Modification, therefore public noticing for SB 288 or Federal Major Modification purposes 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 There are no new emissions units associated with this project Therefore public noticing is not required for this project for PE > 100 lb/day

**c Offset Threshold**

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

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO <sub>x</sub>	25 250	25 250	20 000 lb/year	No
SO <sub>x</sub>	272	272	54,750 lb/year	No
PM <sub>10</sub>	718	718	29,200 lb/year	No
CO	62 370	62 370	200 000 lb/year	No
VOC	130,339	130,339	20,000 lb/year	No

As detailed above there were no thresholds surpassed with this project therefore public noticing is not required for offset purposes

**d 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 According to District policy the SSIPE = SSPE2 – SSPE1 The SSIPE is compared to the SSIPE Public Notice thresholds in the following table

<b>SSIPE Public Notice Thresholds</b>					
<b>Pollutant</b>	<b>SSPE2 (lb/year)</b>	<b>SSPE1 (lb/year)</b>	<b>SSIPE (lb/year)</b>	<b>SSIPE Public Notice Threshold</b>	<b>Public Notice Required?</b>
NO <sub>x</sub>	25 250	25 250	0	20 000 lb/year	No
SO <sub>x</sub>	272	272	0	20,000 lb/year	No
PM <sub>10</sub>	718	718	0	20,000 lb/year	No
CO	62 370	62 370	0	20 000 lb/year	No
VOC	130 339	130 339	0	20 000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year, therefore public noticing for SSIPE purposes is not required

## **2 Public Notice Action**

As discussed above, this project will not result in emissions for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

## **D DAILY EMISSION LIMITS**

- VOC emissions from the vapor recovery system shall not exceed 0.08 pounds per thousand gallons of gasoline loaded [District Rules 4624, 5.1.1 San Joaquin County Rule 412 and 40 CFR 63.11088(a)]
- The flare's combustion chamber shall be configured to operate with logic controls set to shut the flare system down and close the block valve to receiving vapors if the operating temperature does not reach a minimum of 900 degrees Fahrenheit within 10 minutes [District Rules 2201, 4102 and 40 CFR 63.11088(d)]

## **E Compliance Assurance**

### **1 Source Testing**

The facility is a Class 1 Organic Liquid Transfer Facility as defined in District Rule 4624. Rule 4624 requires that compliance with the VOC limit of 0.08 lb/1,000 gallon be demonstrated upon initial start-up and at least 60 months thereafter. The rule does allow the facility to skip the initial test if it has been previously done. The proposed VOC control unit is existing, therefore initial testing will not be required. The facility will be required to conduct testing at least once every 60 months.

As was determined in previous Project N-1082080, Toxics Best Available Control Technology was required and was determined to be bottom loading, the use of dry-break couplers and a control device that will provide at least 99% destruction of VOC's. The facility will continue to be required to operate the flare at the temperature shown by source testing to achieve 99% control efficiency and will be required to continuously record the combustion chamber temperature. Since

the flare depends solely on temperature and residence time to provide control (it does not use a catalytic element that would be subject to degradation), no decrease in emission control is expected over time. An initial destruction efficiency test was required and no additional testing will be required.

## **2 Monitoring**

Section 5.9.1 of Rule 4624 requires that the vapor collection system, the vapor destruction device and each transfer rack be tested at least once every calendar quarter with a portable hydrocarbon analyzer in accordance with EPA method 21

40 CFR 60.502(j) requires that each calendar month the vapor collection system, the vapor processing system and each loading rack handling gasoline be inspected during the loading of gasoline tank trucks for organic liquid and organic vapor leaks.

Each regulation has different monitoring requirements. Therefore, both inspection procedures will be required.

## **3 Record Keeping**

40 CFR Part 60.505(a) requires that the vapor tightness documentation required by 60.502(e)(1) be kept on file in a permanent form. Part 60.505(b) requires that the file be updated at least once per year.

One component of the daily and annual emission limits is the loading rack throughput. Daily and annual loading rack throughput records will be required.

The annual records will be required to be updated monthly instead of weekly; therefore, the following condition will be included on the permit:

- A record of the cumulative annual quantity of gasoline loaded from the loading racks operating under Permits to Operate N-829-1 and N-829-2 shall be kept. The record shall be updated at least monthly. [District Rule 2520]

Even though the annual recordkeeping will only be required to be updated monthly, since the more stringent daily throughput recordkeeping requirement will continue to be required, there is no relaxation in the recordkeeping requirements.

## **4 Reporting**

No applicable rule or policy requires reporting.

### **Rule 2410 Prevention of Significant Deterioration**

The prevention of significant deterioration (PSD) program is a construction permitting program for new major stationary sources and major modifications to existing major stationary sources.

located in areas classified as attainment or in areas that are unclassifiable for any criteria air pollutant

As demonstrated above, this project is not subject to the requirements of Rule 2410 due to a significant emission increase and no further discussion is required

### **Rule 2520 Federally Mandated Operating Permits**

This facility is subject to this Rule and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, these modifications

- 1 Do not violate requirements of any applicable federally enforceable local or federal requirement
- 2 Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions
- 3 Do not require or change a case-by-case determination of an emission limitation or other standard or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis
- 4 Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include
  - a A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act, and
  - b An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act and
- 5 Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act and
- 6 Do not seek to consolidate overlapping applicable requirements

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment application.

The following two federally enforceable conditions will be placed on the Authorities to Construct:

- 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 2520] Y
- Prior to operating with the modifications authorized by this Authority to Construct, the facility shall submit an application for an administrative amendment to its Title V permit in accordance with District Rule 2520, Section 11.4.2. [District Rule 2520] Y

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

It was determined during the processing of project N-1011153 that the equipment is subject to 40 CFR Part 60, Subpart XX. This subpart includes performance requirements, testing, reporting and record keeping.

### **Performance Requirements (60 502)**

#### **Control Requirements – 60 502(a)**

This section requires a vapor collection system to collect the organic vapors displaced from tank trucks during product loading. Such equipment is currently in place and will continue to be. Compliance is expected.

#### **Emission Limits - 60 502(b)**

This section limits the VOC emissions to 35 mg/l of throughput, which is equivalent to 0.29 lb/1,000 gal. The equipment will be subject to the Rule 4634 limit of 0.08 lb VOC/gal, which is more stringent. Compliance with the emission limit of this section is expected.

#### **Vapor Tight Tank Trucks - 60 502(e)(1)**

This section requires that documentation attesting to the vapor tightness of each tank truck to be loaded at the facility be obtained. Such a condition will be included on the Authority to Construct and the Permit to Operate.

#### **Inspections – 60 502(j)**

This section requires that the vapor collection system, the vapor processing system and each loading rack that handles gasoline be inspected at least monthly for organic liquid or vapor leaks. It further requires that the inspections be conducted during the loading of gasoline tank trucks. Such testing will be required.

### **Testing (60 503)**

The source testing that is required by District Rule 4624 is at least equivalent to the testing required by this section. Compliance is expected.

### **Reporting and Record Keeping (60 505)**

#### **Reporting**

No reporting is required.

**Record Keeping - 60 505(a through f)**

This section requires that tank truck vapor tightness documentation be kept and that it be updated once every year to reflect current test results. The retention of such documentation is required on the current permit and will continue to be required.

A record of the results of the monthly vapor control system inspections, as well as of the actions taken as a result of these inspections, is required on the current permit and will continue to be required.

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

**40 CFR Part 63 Subpart BBBBBB (National Emission Standards for Hazardous Air Pollutants for Source Category Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities)**

This facility is a Bulk Terminal as defined in this subpart.

**Section 63 11088 Loading Rack Requirements**

The equipment under consideration is loading racks with combined throughput capacities of more than 250,000 gallons per day. Therefore, the requirements of Table 2 (Line 1) apply. The requirements and the compliance methods are below.

Line 1(a) The equipment must be equipped with a vapor collection system designed to collect the organic vapors displaced from the cargo tanks during product loading.

*The equipment is equipped with such equipment, therefore compliance is being met.*

Line 1(b) The emissions must be reduced to a level of less than 80 mg/l of gasoline loaded into the gasoline cargo tanks at the loading racks.

*The VOC emissions are currently limited to 0.08 lb/1,000 gallons of throughput. The mg/l equivalent of this limit is*

$$(0.08 \text{ lb}/1,000 \text{ gal})(\text{gal}/3,785 \text{ l})(453.6 \text{ g/lb}) = 0.0096 \text{ g/l}$$

*As can be seen, the current emission limit is more stringent than the requirement currently being addressed. Therefore, compliance is expected.*

Line 1(c) Design and operate the vapor collection system to prevent any vapors collected at one loading rack or lane from passing through another loading rack or lane to the atmosphere.

*A condition requiring compliance with this requirement is on the current Permit to Operate and will be included on the proposed Authority-to-Construct and Permit to Operate. Therefore, compliance is expected.*

Line 1(d) Limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in section 60 502(e) through (j)

*A condition requiring compliance with this requirement is on the current Permit to Operate and will be included on the proposed Authority-to-Construct and Permit to Operate Therefore, compliance is expected*

### **Section 63 11089 Leak Inspections**

This section specifies the applicable leak inspection requirements

#### **63 11089(a) Leak Test Frequency**

This section requires monthly leak testing The current Permit to Operate includes the following condition which will be included on the proposed Authority-to-Construct permit

Each calendar month, the vapor collection system, the vapor processing system and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for organic liquid and organic vapor leaks For the purpose of this condition, detection methods incorporating sight sound and smell are acceptable Each detection of a leak shall be recorded and the source of the leak repaired within 15 days after it is detected [40 CFR Part 60 502(j) and 40 CFR Part 63 11089(a)] Y

#### **63 11089(b) Log Book Requirements**

This section specifies the applicable log book requirements The current Permit to Operate includes the following condition which will be included on the proposed Authority-to-Construct permit

A log book shall be used and shall be signed by the owner or operator at the completion of each inspection A section of the log book shall contain a list summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility [40 CFR Part 63 11089(b)] Y

#### **63 11089(c) Log Book Contents and Repair Attempt Deadline**

#### **63 11089(d) Repair Attempt Deadline Allowance and Inclusion in Annual Report**

These sections specify log book requirements repair attempt deadlines and exceptions to the repair attempt deadline The current Permit to Operate includes the following condition which will be included on the proposed Authority-to-Construct permit

Each detection of a liquid or vapor leak shall be recorded in the log book When a leak is detected an initial attempt at repair shall be made as soon as practicable but no later than 5 calendar days after the leak is detected Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days The owner or operator shall provide in the semiannual report the reason(s) why the repair was not feasible and the date each repair was completed [40 CFR Part 63 11089(c) and (d)] Y

### **63 11089(e) Compliance Date**

The facility is currently in compliance with this rule

### **63 11089(f) Notifications required by section 63 11094 through 63 11095**

Per the Application Review for project N-1092711 the required notifications were received in May 2008

### **63 11089(g) Records and Reports**

This section specifies record keeping and reporting requirements. The current Permit to Operate includes the following conditions which will be included on the proposed Authority-to-Construct permit

*The owner or operator shall maintain a log book that contain the following information 1 ) dates of leak inspections 2 ) the nature of the leak (i e vapor or liquid) and the method of detection, 3 ) findings, 4 ) corrective action, 5 ) repair methods applied in each attempt to repair the leak, 6 ) repair delayed and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak, 6 ) the expected date of successful repair of the leak if the leak is not repaired within 15 days, 7 ) the date of successful repair of the leak and 8 ) inspector name and signature [Distinct Rule 4624, 6 1 3, 40 CFR Part 60 505 (c) and 40 CFR 63 11089(g)] Y*

*The owner or operator shall report the number of equipment leaks not repaired within 15 days after detection in a semi-annual report [40 CFR 63 11089(g)] Y*

### **Rule 4101 Visible Emissions**

As long as the equipment is properly maintained and operated the visible emissions are not expected to exceed 20% opacity for a period or periods aggregating more than 3 minutes in any one hour. Compliance with the provisions of this rule is expected.

### **Rule 4102 Nuisance**

Rule 4102 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.

### **California Health & Safety Code 41700 (Health Risk Assessment)**

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

## **Rule 4311 Flares**

This rule includes general requirements, emission limits recordkeeping requirements and source testing requirements

Section 3 11 defines a flare as “a direct combustion device in which air and all combustible gases react at the burner with the objective of complete and instantaneous oxidation of the combustible gases Flares are used either continuously or intermittently and are not equipped with devices for fuel-air mix control or for temperature control

The applicant has provided information from the manufacture demonstrating that the vapor combustor is equipped with devices for fuel-air mixture and also for temperature control therefore the vapor combustor according the definition in the rule, is not considered a flare and is not subject to the rule No further discussion is required

## **Rule 4624 Transfer of Organic Liquid**

The control system currently being modified serves a Class 1 Organic Liquid Transfer Facility as defined in this rule

### **Emission Limits**

The rule limits the VOC emissions from such equipment to 0 08 lb per 1 000 gallons of liquid throughput The Authority to Construct and the Permit to Operate will include conditions requiring compliance

### **Leak Inspections**

Section 5 9 1 requires that the vapor collection system and the control device be inspected at least once every calendar quarter for leaks during transfer The use of a portable hydrocarbon analyzer is required The Authority to Construct and the Permit to Operate will require the necessary inspections

### **Record Keeping**

Section 6 1 3 requires that the operator keep records of the daily throughput and of the results of any required leak inspections Section 6 1 4 requires that the records be retained for a minimum of five years and that the records be made readily available to the District The Authority to Construct and the Permit to Operate will include conditions requiring this record keeping

### **Source Testing**

This rule requires initial source testing to verify compliance with the 0 08 lb/1 000 gallon VOC limit of section 5 1 The required methods are as follows

EPA Methods 2A 2B 25A and 25B and ARB Method 422 or ARB Test Procedure TP-203 The test procedures of 40 CFR 60 503 which include a leak test of the vapor collection system are required to be followed

### **Rule 4801 Sulfur Compounds**

The items combusted will consist of gasoline and a small amount of supplemental natural gas Neither of these products contains significant sulfur Compliance with this rule is expected

### **California Health & Safety Code 42301 6 (School Notice)**

The District has verified that this site is located within 1 000 feet of a school However pursuant to California Health and Safety Code 42301 6 since this project will not result in an increase in emissions a school notice is not required

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

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 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 and
- 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 all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements Furthermore the District has determined that potential emission increases would have a less than significant health impact on sensitive receptors

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation Thus the District concludes that this permitting action constitutes a ministerial approval Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval Therefore the District finds that this project is exempt from the provisions of CEQA

**IX Recommendation**

Compliance with all applicable rules and regulations is expected. Pending a successful EPA noticing period, issue ATC N-829-20-8 subject to the permit conditions on the attached draft ATC in **Appendix A**

**X Billing Information**

Permit #	Description	Fee Schedule
N-829-20-8	40 MMBtu/hr	3020-2-H

**Appendices**

- Appendix A Draft ATC
- Appendix B Emission Profile
- Appendix C Current PTO
- Appendix D Baseline Period Throughput Records
- Appendix E TV Compliance Certification Form
- Appendix F BACT Guideline

**Appendix A**  
**Draft ATC**

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE DRAFT

PERMIT NO N-829-20 8

LEGAL OWNER OR OPERATOR NUSTAR TERMINALS OPS PARTNERSHIP LP  
MAILING ADDRESS 2368 MARITIME DR - STE 275  
ELK GROVE CA 95758

LOCATION 2941 NAVY DRIVE  
STOCKTON CA 95206

### EQUIPMENT DESCRIPTION

MODIFICATION OF VAPOR RECOVERY SYSTEM CONSISTING OF A 300 000 GALLON VAPOR HOLDING TANK A VAPOR PROCESSING AND CONVEYING SYSTEM AND A 40 MMBTU/HR NATURAL GAS FIRED JOHN ZINK ZCT 2 8 35 X-2/8-X VAPOR COMBUSTOR REMOVE PREHEATING REQUIREMENT AND CHANGE THE ASSIST FUEL FROM NATURAL GAS TO PROPANE

## CONDITIONS

- {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
- {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
- {15} 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 as dark as or darker than Ringelmann 1 or 20% opacity [District Rule 4101]
- The VOC destruction efficiency shall be at least 99% and all gasoline loading shall be conducted utilizing bottom loading and dry break couplers [District Rule 4102]
- Gasoline shall be loaded only into vapor tight tank trucks [40 CFR Part 60 502(e)] Federally Enforceable Through Title V Permit
- The facility shall obtain the vapor tightness documentation specified in 40 CFR Part 60 505(b) for each gasoline tank truck that is to be loaded at the facility [40 CFR Part 60 502(e)(1)] 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

DAVID WARNER Director of Permit Services

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- 7 VOC emissions from the vapor recovery system shall not exceed 0.08 pounds per thousand gallons of gasoline loaded [District Rules 4624, 5 1 1 San Joaquin County Rule 412, and 40 CFR 63 11088(a)] Federally Enforceable Through Title V Permit
- 8 The vapor collection system shall be operated in a manner to prevent any organic vapors collected at one loading rack from passing to another loading rack [40 CFR 63 11088(a)] Federally Enforceable Through Title V Permit
- 9 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 6 inches water column vacuum [District Rule 4624] Federally Enforceable Through Title V Permit
- 10 The combined quantity of gasoline loaded through permit units N 829-1 and N 829-2 shall not exceed 756 000 000 gallons during any one calendar year. This annual limit shall be lowered in the event that the CARB certifies the vapor recovery system can process VOC emissions with a daily gasoline throughput of less than 2 071 233 gallons [District Rule 2201] Federally Enforceable Through Title V Permit
- 11 The combined quantity of gasoline loaded through permit units N 829 1 and N-829 2 shall not exceed 2 071 233 gallons during any one day [District Rule 2201] Federally Enforceable Through Title V Permit
- 12 The vapor combustor's combustion chamber shall be configured to operate with logic controls set to shut the vapor combustor system down and close the block valve to receiving vapors if the operating temperature does not reach a minimum of 900 degrees Fahrenheit within 10 minutes [District Rules 2201 4102 and 40 CFR 63 11088(d)] Federally Enforceable Through Title V Permit
- 13 The vapor combustor shall be equipped for continuous monitoring and recording of combustion temperature. Temperature charts shall be made available to the District upon request [District Rule 2201 40 CFR Part 64 and 40 CFR 63 11088(d)] Federally Enforceable Through Title V Permit
- 14 Should the vapor combustor's operating temperature fall below the minimum value necessary to maintain compliance with the permitted VOC destruction efficiency and VOC emission limit, the permittee shall investigate the cause and take corrective action to return the operating temperature to an acceptable level as soon as possible, but no longer than one hour after initial detection. If the operating temperature cannot be raised to an acceptable value within one hour after detection, the permittee shall notify the District within the following hour and conduct a certified source test within 60 days of initial detection. In lieu of conducting a source test, the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviation is a result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 15 Loading and vapor collection and control equipment shall be designed, installed, maintained, and operated such that there are no leaks. A leak is defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds in excess of 10,000 ppm as methane measured at a distance of one centimeter from potential source in accordance with EPA Method 21 [District Rule 4624 and San Joaquin County Rule 412] Federally Enforceable Through Title V Permit
- 16 The vapor collection system, the vapor destruction device, and each transfer rack shall be tested for leaks at least once every calendar quarter with a portable hydrocarbon analyzer in accordance with EPA Method 21 [District Rule 4624] Federally Enforceable Through Title V Permit
- 17 The equipment that are found leaking shall be repaired or replaced within 72 hours after detecting the leakage. 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 reinspected the first time the equipment is in operation after the repair or replacement [District Rule 4624] Federally Enforceable Through Title V Permit
- 18 Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for organic liquid and organic vapor leaks. For the purpose of this condition, detection methods incorporating sight, sound, and smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 days after it is detected [40 CFR Part 60 502(j) and 40 CFR Part 63 11089(a)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 19 A log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log book shall contain a list, summary, description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [40 CFR Part 63 11089(b)] Federally Enforceable Through Title V Permit
- 20 Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report the reason(s) why the repair was not feasible and the date each repair was completed. [40 CFR Part 63 11089(d)] Federally Enforceable Through Title V Permit
- 21 The owner or operator shall maintain a log book that contain the following information: 1) dates of leak inspections; 2) the nature of the leak (i.e., vapor or liquid) and the method of detection; 3) findings; 4) corrective action; 5) repair methods applied in each attempt to repair the leak; 6) repair delayed and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak; 7) the expected date of successful repair of the leak if the leak is not repaired within 15 days; 8) the date of successful repair of the leak; and 9) inspector name and signature. [District Rule 4624, 40 CFR Part 60 505 (c) and 40 CFR 63 11089(g)] Federally Enforceable Through Title V Permit
- 22 The owner or operator shall report the number of equipment leaks not repaired within 15 days after detection in a semiannual report. [40 CFR 63 11089(g)] Federally Enforceable Through Title V Permit
- 23 During source testing, the loading rack's vapor collection and control system (VCCS) shall be tested at every loading position to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. [District Rule 2520 and 40 CFR 60 503(d)] Federally Enforceable Through Title V Permit
- 24 Source testing to determine compliance with the emission rate requirement of this permit shall be conducted at least once every 60 months. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
- 25 Source testing shall be conducted using methods and procedures approved by District. The District must be notified 30 days prior to any compliance source testing and a pretest plan outlining the test methods and procedures shall be submitted for the District approval no later than 15 days prior to each test. [District Rule 1081] Federally Enforceable Through Title V Permit
- 26 Source testing shall be witnessed or authorized by District Personnel. [District Rule 1081] Federally Enforceable Through Title V Permit
- 27 VOC emissions from the vapor collection and control system shall be determined using 40 CFR 60 503 Test Methods and Procedures and EPA Reference Methods 2A, 2B, 25A, 25B and ARB Method 422 or ARB Test Procedure TP 203.1. [District Rule 4624 and San Joaquin County Rule 412] Federally Enforceable Through Title V Permit
- 28 Source testing for VOC destruction efficiency shall be conducted utilizing EPA Method 18, EPA Method 25A or CARB Method 100. Alternative methods may be utilized provided they are previously approved by the District in writing. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- 29 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
- 30 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 2520] Federally Enforceable Through Title V Permit
- 31 A record of the daily quantity of gasoline loaded from the loading racks operating under Permits to Operate N-829 1 and N 829 2 shall be kept. [District Rules 2520, 4624] Federally Enforceable Through Title V Permit
- 32 A record of the cumulative annual quantity of gasoline loaded from the loading racks operating under Permits to Operate N 829 1 and N 829-2 shall be kept. The record shall be updated at least monthly. [District Rule 2520] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 33 Documentation attesting to the vapor tightness of each truck loaded with gasoline shall be kept. The documentation file for each tank truck shall be updated at least once per year to reflect the current test results as determined by EPA method 27 [40 CFR Part 60.5059(a) and 40 CFR 63.11094(b)] Federally Enforceable Through Title V Permit
- 34 The semi-annual compliance report shall include each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility [40 CFR 63.11088(f)] Federally Enforceable Through Title V Permit
- 35 All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request [District Rules 1070.4624] Federally Enforceable Through Title V Permit

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**Appendix B**  
**Emission Profile**

Permit # N-829-20 8	Last Updated
Facility NUSTAR TERMINALS OPS	01/18/2014 GARCIAJ

Equipment Pre Baselined NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr)	25250 0	272 0	718 0	62370 0	60480 0
Daily Emis Limit (lb/Day)	69 2	0 7	2 0	170 9	165 7
Quarterly Net Emissions Change (lb/Qtr)					
Q1	0 0	0 0	0 0	0 0	0 0
Q2	0 0	0 0	0 0	0 0	0 0
Q3	0 0	0 0	0 0	0 0	0 0
Q4	0 0	0 0	0 0	0 0	0 0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1					
Q2					
Q3					
Q4					

**Appendix C**  
**Current PTO**

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT N 829-20-7

EXPIRATION DATE 11/30/2015

## EQUIPMENT DESCRIPTION

VAPOR RECOVERY SYSTEM CONSISTING OF A 300 000 GALLON VAPOR HOLDING TANK A VAPOR PROCESSING AND CONVEYING SYSTEM AND A 40 MMBTU/HR NATURAL GAS FIRED JOHN ZINK ZCT 2 8 35 X 2/8 X VAPOR COMBUSTOR

## PERMIT UNIT REQUIREMENTS

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- 1 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 as dark as or darker than Ringelmann 1 or 20% opacity [District Rule 4101]
- 2 The VOC destruction efficiency shall be at least 99% and all gasoline loading shall be conducted utilizing bottom loading and dry break couplers [District Rule 4102]
- 3 Gasoline shall be loaded only into vapor tight tank trucks [40 CFR Part 60 502(e)] Federally Enforceable Through Title V Permit
- 4 The facility shall obtain the vapor tightness documentation specified in 40 CFR Part 60 505(b) for each gasoline tank truck that is to be loaded at the facility [40 CFR Part 60 502(e)(1)] Federally Enforceable Through Title V Permit
- 5 VOC emissions from the vapor recovery system shall not exceed 0 08 pounds per thousand gallons of gasoline loaded [District Rules 4624 5 1 1 San Joaquin County Rule 412 and 40 CFR 63 11088(a)] Federally Enforceable Through Title V Permit
- 6 The vapor collection system shall be operated in a manner to prevent any organic vapors collected at one loading rack from passing to another loading rack [40 CFR 63 11088(a)] Federally Enforceable Through Title V Permit
- 7 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 6 inches water column vacuum [District Rule 4624, 5 4] Federally Enforceable Through Title V Permit
- 8 The combined quantity of gasoline loaded through permit units N 829-1 and N-829 2 shall not exceed 756 000 000 gallons during any one calendar year This annual limit shall be lowered in the event that the CARB certifies the vapor recovery system can process VOC emissions with a daily gasoline throughput of less than 2 071 233 gallons [District NSR Rule] Federally Enforceable Through Title V Permit
- 9 The combined quantity of gasoline loaded through permit units N 829-1 and N-829-2 shall not exceed 2 071,233 gallons during any one day [District Rule 2201] Federally Enforceable Through Title V Permit
- 10 The flare s combustion chamber shall be at or above 900 degrees Fahrenheit at all times that it is receiving combustible material [District Rules 2201 4102 and 40 CFR 63 11088(d)] Federally Enforceable Through Title V Permit
- 11 The flare shall be equipped for continuous monitoring and recording of combustion temperature Temperature charts shall be made available to the District upon request [District NSR Rule 40 CFR Part 64 and 40 CFR 63 11088(d)] 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 Should the flare's operating temperature fall below the minimum value necessary to maintain compliance with the permitted VOC destruction efficiency and VOC emission limit the permittee shall investigate the cause and take corrective action to return the operating temperature to an acceptable level as soon as possible but no longer than one hour after initial detection. If the operating temperature cannot be raised to an acceptable value within one hour after detection the permittee shall notify the District within the following hour and conduct a certified source test within 60 days of initial detection. In lieu of conducting a source test the permittee may stipulate a violation that is subject to enforcement action has occurred. The permittee must then correct the violation show compliance has been re-established and resume monitoring procedures. If the deviation is a result of a qualifying breakdown condition pursuant to Rule 1100 the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 13 Loading and vapor collection and control equipment shall be designed installed maintained and operated such that there are no leaks. A leak is defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10 000 ppm as methane measured at a distance of one centimeter from potential source in accordance with EPA Method 21 [District Rule 4624 3 17, 5 6 and San Joaquin County Rule 412] Federally Enforceable Through Title V Permit
- 14 The vapor collection system the vapor destruction device and each transfer rack shall be tested for leaks at least once every calendar quarter with a portable hydrocarbon analyzer in accordance with EPA Method 21 [District Rule 4624, 5 9 1] Federally Enforceable Through Title V Permit
- 15 The equipment that are found leaking shall be repair or replaced within 72 hours after detecting the leakage. 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 reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624 5 9 3] Federally Enforceable Through Title V Permit
- 16 Each calendar month the vapor collection system the vapor processing system and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for organic liquid and organic vapor leaks. For the purpose of this condition detection methods incorporating sight sound and smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 days after it is detected. [40 CFR Part 60 502(j) and 40 CFR Part 63 11089(a)] Federally Enforceable Through Title V Permit
- 17 A log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log book shall contain a list, summary description or diagram(s) showing the location of all equipment in gasoline service at the facility. [40 CFR Part 63 11089(b)] Federally Enforceable Through Title V Permit
- 18 Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected an initial attempt at repair shall be made as soon as practicable but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report the reason(s) why the repair was not feasible and the date each repair was completed. [40 CFR Part 63 11089(d)] Federally Enforceable Through Title V Permit
- 19 The owner or operator shall maintain a log book that contain the following information 1 ) dates of leak inspections 2 ) the nature of the leak (i e vapor or liquid) and the method of detection 3 ) findings 4 ) corrective action 5 ) repair methods applied in each attempt to repair the leak 6 ) repair delayed and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak 6 ) the expected date of successful repair of the leak if the leak is not repaired within 15 days 7 ) the date of successful repair of the leak, and 8 ) inspector name and signature [District Rule 4624 6 1 3 40 CFR Part 60 505 (c) and 40 CFR 63 11089(g)] Federally Enforceable Through Title V Permit
- 20 The owner or operator shall report the number of equipment leaks not repaired within 15 days after detection in a semi annual report. [40 CFR 63 11089(g)] 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

- 21 During source testing the loading rack's vapor collection and control system (VCCS) shall be tested at every loading position to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. [District Rule 2520, 9 3 2 and 40 CFR 60 503(d)] Federally Enforceable Through Title V Permit
- 22 Source testing to determine compliance with the emission rate requirement of this permit shall be conducted at least once every 60 months. [District Rules 2201 and 4624 6 2 2] Federally Enforceable Through Title V Permit
- 23 Source testing shall be conducted using methods and procedures approved by District. The District must be notified 30 days prior to any compliance source testing and a pretest plan outlining the test methods and procedures shall be submitted for the District approval no later than 15 days prior to each test. [District Rule 1081 6 0 and 7 1] Federally Enforceable Through Title V Permit
- 24 Source testing shall be witnessed or authorized by District Personnel. [District Rule 1081 7 2] Federally Enforceable Through Title V Permit
- 25 VOC emissions from the vapor collection and control system shall be determined using 40 CFR 60 503 "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A, 25B, and ARB Method 422, or ARB Test Procedure TP-203 1. [District Rule 4624 6 3 2 and San Joaquin County Rule 412] Federally Enforceable Through Title V Permit
- 26 Source testing for VOC destruction efficiency shall be conducted utilizing EPA Method 18, EPA Method 25A, or CARB Method 100. Alternative methods may be utilized provided they are previously approved by the District in writing. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- 27 The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7 3] Federally Enforceable Through Title V Permit
- 28 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 2520 9 3 2] Federally Enforceable Through Title V Permit
- 29 A record of the daily quantity of gasoline loaded from the loading racks operating under Permits to Operate N 829 1 and N 829 2 shall be kept. [District Rules 2520 9 3 2, 4624 6 1 3] Federally Enforceable Through Title V Permit
- 30 A record of the cumulative annual quantity of gasoline loaded from the loading racks operating under Permits to Operate N 829 1 and N 829 2 shall be kept. The record shall be updated at least weekly. [District Rule 2520, 9 3 2] Federally Enforceable Through Title V Permit
- 31 Documentation attesting to the vapor tightness of each truck loaded with gasoline shall be kept. The documentation file for each tank truck shall be updated at least once per year to reflect the current test results as determined by EPA method 27. [40 CFR Part 60 5059(a) and 40 CFR 63 11094(b)] Federally Enforceable Through Title V Permit
- 32 The semi-annual compliance report shall include each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. [40 CFR 63 11088(f)] Federally Enforceable Through Title V Permit
- 33 All records shall be maintained and retained on site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 4624 6 1 4] Federally Enforceable Through Title V Permit

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

**Appendix D**  
**Baseline Period Throughput Records**

<b>Month</b>	<b>Permitted Units N 829 1 and N 829 2 Throughput (gallons)</b>
Nov 11	28 754 517
Dec 11	28 806,767
Jan 12	27,350,655
Feb 12	27 342,890
Mar 12	30 111 805
Apr 12	30 248 779
May 12	26 836 749
Jun 12	29 815 996
Jul 12	28,520 424
Aug 12	28,841 452
Sep 12	27 740 528
Oct 12	28 741 606
Nov 12	26,758,487
Dec 12	26 170 550
Jan 13	30 584 713
Feb 13	27 896 146
Mar 13	32 269 613
Apr 13	30 808 800
May 13	26 360 992
Jun 13	18 668 886
Jul 13	20 175,722
Aug 13	20,918,307
Sep 13	17 137 226
Oct 13	16 076 987

**Appendix E**  
**TV Compliance Certification Form**



**Appendix F**  
**BACT Guideline**

San Joaquin Valley  
Unified Air Pollution Control District

**Best Available Control Technology (BACT) Guideline 7 1 10\***

Last Update 2/23/2005

**Loading Rack/Switch Loading**

<b>Pollutant</b>	<b>Achieved in Practice or contained in the SIP</b>	<b>Technologically Feasible</b>	<b>Alternate Basic Equipment</b>
CO	natural gas fired pilot and air assist		
NOx	natural gas or LPG fired pilot and air assist		
PM10	air assisted flare with smokeless combustion		
SOx	natural gas fired flare		
VOC	bottom loading with dry break couplers and vapor collection vented to a thermal incinerator or flare with destruction efficiency => 99%		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

**\*This is a Summary Page for this Class of Source**