



MAY 27 2015

Mr. John Walker
Tesoro Logistics Operations LLC
3003 Navy Drive
Stockton, CA 95206

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # N-845
Project # N-1143723**

Dear Mr. Walker:

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. This project is for the modification of the existing 4,000 gallon diesel lubricity additive storage tank, under permit unit N-845-23 to store a different additive and increase the annual processing throughput.

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. 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

AM/ws

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

San Joaquin Valley Air Pollution Control District Authority to Construct

Modification the Diesel Lubricity Additive Storage Tank #11

Facility Name: Tesoro Logistics Operations LLC 3rd Revised Date: May 19, 2015
Mailing Address: 3003 Navy Drive Engineer: Wai-Man So
Stockton, CA 95206 Lead Engineer: Nick Peirce
Contact Person: Steve Comley (Sr. Environ. Specialist) Beth Ryder (Consultant)
Telephone: (562) 728 – 2265 (510) 285 – 6351 ext. 105
Cell: (562) 572 – 3987 (541) 908 – 2479
Email: stephen.d.comley@tsocorp.com bryder@trinityconsultants.com
Application #(s): N-0845-23-2
Project #: N-1143723
Deemed Complete: May 12, 2015

I. PROPOSAL

Tesoro Logistic Operations LLC (hereinafter Tesoro) is requesting an Authority to Construct permit for the modification of the existing 4,000 gallon diesel lubricity additive storage tank, under permit unit N-845-23 to store a new diesel lubricity additive, Innospec OLI-9103.x, increase the annual processing throughput, and install a pressure-vacuum relief valve.

Tesoro possesses a Title V permit. The proposed project is a Minor Modification to the Title V permit per section 3.20 of District Rule 2520. The applicant has requested to issue the ATC with a Certificate of Conformity (COC), which is EPA's 45-day review of the project prior to the issuance of the final ATC. Tesoro must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modification.

II. APPLICABLE RULES

District Rule 2201 New and Modified Stationary Source Review Rule (04/21/11)
District Rule 2410 Prevention of Significant Deterioration (effective 11/26/12)
District Rule 2520 Federal Mandated Operating Permits (06/21/01)
District Rule 4001 New Source Performance Standards (04/14/99):
40 CFR Part 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage vessels) for Which Construction after July 23, 1984
District Rule 4002 National Emission Standards for Hazardous Air Pollutants (05/20/04):
40 CFR Part 63 Subpart R – Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)
40 CFR Part 63 Subpart BBBB – Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
District Rule 4101 Visible Emissions (02/17/05)

District Rule 4102 Nuisance (12/17/92)
District Rule 4623 Storage of Organic Liquids (05/19/05)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. PROJECT LOCATION

The facility is located at 3003 Navy Drive in Stockton, California. The District has verified that this facility is not located within 1,000 feet of the outer boundary of any 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

Except to store a different diesel lubricity additive, no physical change to the tank and any operating procedures are proposed. See detail process description in engineering evaluation under project N-1051387.

V. EQUIPMENT LISTING

Pre-Project Equipment Description:

4,000 GALLON DIESEL LUBRICITY ADDITIVE STORAGE TANK

Post-Project Equipment Description:

4,000 GALLON ABOVEGROUND DIESEL LUBRICITY ADDITIVE STORAGE TANK

VI. EMISSION CONTROL TECHNOLOGY EVALUATION

This existing tank is not equipped with any emission control device.

VII. GENERAL CALCULATIONS

A. Assumptions

- VOC is the only emitted criteria pollutant associated with this project.
- Assumption will be stated when each is made.

B. Emission Factors

Pre-Project Emission Factors (EF1) & Post-Project Emission Factors (EF2)

The VOC emission from this tank will be determined using EPA's Tanks 4.0.9.d software program, therefore, a separate emissions factor is not necessary.

C. Potential to Emit (PE) Calculations

1. Daily and Annual PE

EPA's Tanks 4.0.9d program was used to calculate the pre-project and post-project potential emissions from this existing 4,000 gallon aboveground tank. Emissions from the tank include both working loss emissions and breathing loss emissions. See detail pre-project and post-project potential emissions in Appendix III and Appendix IV of this document respectively.

Pre-Project Potential to Emit (PE1)

Daily Emissions

Working Loss

From the Tanks program report, the working loss emissions are 37.66 lb-VOC for a monthly tank throughput of 11,857 gallons, and a maximum daily throughput of 3,826 gallons. The daily working loss emissions are then calculated, assuming the working losses are linearly proportional to the tank throughput as follow:

$$\begin{aligned} \text{Daily Working Loss PE1} &= 37.66 \text{ lb-VOC} \div 11,857 \text{ gal} \times 3,826 \text{ gal/day} \\ &= 12.15 \text{ lb-VOC/day} \end{aligned}$$

Breathing Loss

The worst-case daily breathing loss emissions are assumed to occur during the hottest month, July in the District. From the Tanks program report, the breathing loss emissions are 20.64 lb-VOC for the entire month of July. The daily breathing losses are then calculated as follow:

$$\begin{aligned} \text{Daily Breathing Loss PE1} &= 20.64 \text{ lb-VOC} \div 31 \text{ day} \\ &= 0.67 \text{ lb-VOC/day} \end{aligned}$$

Total PE1

$$\begin{aligned} \text{Total Daily PE1} &= \text{Daily Working Loss} + \text{Daily Breathing Loss} \\ &= (12.15 + 0.67) \text{ lb-VOC/day} \\ &= 12.8 \text{ lb-VOC/day} \end{aligned}$$

Annual Emissions

From the Tank program report, the emissions for an annual tank throughput of 11,857 gallons are 186 pounds of VOC per year.

The pre-project daily and annual potential emissions are summarized in the table below:

Pollutant	Daily PE1 (lb/day)	Annual PE1 (lb/year)
VOC	12.8	186

Post-Project Potential to Emit (PE2)

The applicant is proposing to store a new diesel lubricity additive that results in lower emissions. Since this is the only additive that will be stored, the proposed modification will result in a decrease in emissions.

Daily Emissions

Working Loss

From the Tanks program report, the working loss emissions are 11.67 lb-VOC for a monthly tank throughput of 30,000 gallons, and a maximum daily throughput of 3,826 gallons. The daily working loss emissions are then calculated, assuming the working losses are linearly proportional to the tank throughput as follow:

$$\begin{aligned} \text{Daily Working Loss PE2} &= 11.67 \text{ lb-VOC} \div 30,000 \text{ gal} \times 3,826 \text{ gal/day} \\ &= 1.49 \text{ lb-VOC/day} \end{aligned}$$

Breathing Loss

The worst-case daily breathing loss emissions are assumed to occur during the hottest month, July in the District. From the Tanks program report, the breathing loss emissions are 3.04 lb-VOC for the entire month of July. The daily breathing losses are then calculated as follow:

$$\begin{aligned} \text{Daily Breathing Loss PE2} &= 3.04 \text{ lb-VOC} \div 31 \text{ day} \\ &= 0.10 \text{ lb-VOC/day} \end{aligned}$$

Total PE2

$$\begin{aligned} \text{Total Daily PE2} &= \text{Daily Working Loss} + \text{Daily Breathing Loss} \\ &= (1.49 + 0.10) \text{ lb-VOC/day} \\ &= 1.6 \text{ lb-VOC/day} \end{aligned}$$

Annual Emissions

From the Tanks program report, the emissions for an annual tank throughput of 30,000 gallons are 31 pounds of VOC per year.

The post-project daily and annual potential emissions are summarized in the table below:

Pollutant	Daily PE2 (lb/day)	Annual PE2 (lb/year)
VOC	1.6	31

2. Quarterly Net Emissions Change

This calculation is required for application's emission profile, which is used for the District's internal tracking purposes. The emissions will be evenly distributed throughout the year as follows:

$$QEC \text{ (lb/quarter)} = [\text{Annual PE2} - \text{Annual PE1}] \text{ (lb/year)} / 4 \text{ (quarter/year)}$$

The QEC summarized in the table below:

Pollutant	Quarterly Emission Changes (QEC)			
	1 st Quarter (lb/quarter)	2 nd Quarter (lb/quarter)	3 rd Quarter (lb/quarter)	4 th Quarter (lb/quarter)
VOC	-38	-39	-39	-39

3. Adjusted increase in Permitted Emissions (AIPE)

AIPE is used to determine if Best Available Control Technology (BACT) is required for emission units that are being modified. AIPE shall be calculated utilize equations listed in this Rule Section 4.3 and 4.4 as follows:

$$AIPE = PE2 - HAPE$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, pounds per day

PE2 = the emissions units post project Potential to Emit, pounds per day

HAPE = the emissions unit's Historically Adjusted Potential to Emit, pounds per day

$$HAPE = PE1 \times (EF2/EF1)$$

Where,

PE1 = the emissions unit's Potential to Emit prior to modification or relocation

EF2 = the emissions unit's permitted emission factor for the pollutant after modification or relocation. If PE2 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.

Then,

$$AIPE = PE2 - [PE1 \times (EF2/EF1)]$$

As shown in Section VII.C.1 of this document, PE2 is less than 2.0 pounds per day. Therefore, AIPE will not exceed 2.0 lb-VOC/day.

D. Facility Emissions

1. 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.

Except permit unit is modified under this project, SSPE1 values are taken from engineering evaluation under project N-1112963.

Permit Number	Pollutants (lb/yr)
	VOC
N-845-1-3	1,621
N-845-4-2	4,477
N-845-5-3	2,761
N-845-6-5	621
N-845-10-3	48
N-845-22-4	19,228
N-845-23-1	186
N-845-24-1	3,150
PE without ERC	32,092
ERC N-1078-1	6,154
SSPE1	38,246

2. 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	Pollutants (lb/yr)
	VOC
N-845-1-3	1,621
N-845-4-2	4,477
N-845-5-3	2,761
N-845-6-5	621
N-845-10-3	48
N-845-22-4	19,228
ATC N-845-23-2	31
N-845-24-1	3,150
PE without ERC	31,937
ERC (N-1078-1)	6,154
SSPE2	38,091

3. Stationary Source Increase in Permitted Emissions (SSIPE)

SSIPE calculations are used to determine if the project triggers public notice pursuant to District Rule 2201, § 5.4.5. If SSIPE results greater than 20,000 lb/yr for any one pollutant then project requires public notification. At this time, it is District Practice to define the SSIPE as the difference of SSPE2 to SSPE1, and calculated by the following equation:

$$\text{SSIFE (lb/yr)} = \text{SSPE2 (lb/yr)} - \text{SSPE1 (lb/yr)}$$

	Pollutants (lb/yr)
	VOC
SSPE2	38,091
SSPE1	38,246
SSIFE ¹	0

As shown above, SSIFE is equal to zero for VOC, the only pollutant associated with this project.

4. 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 this facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Rule 2201 Major Source Determination (lb/year)						
	NO _x	SO _x	PM10	PM2.5	CO	VOC
SSPE1 without ERC	0	0	0	0	0	32,092
SSPE2 without ERC	0	0	0	0	0	31,937
Major Source Threshold	20,000	140,000	140,000	200,000	200,000	20,000
Major Source	No	No	No	No	No	Yes

Note: PM2.5 assumed to be equal to PM10

As seen above, this facility is a Major Source for VOC emissions.

Rule 2410 Major Source Determination:

The facility or equipment evaluated under this project is listed as one of the categories specified in 40 CFR 52.21(b)(1)(iii). Therefore, the PSD Major Source threshold is 100 tpy for any regulated NSR pollutant.

¹ Per District practice, negative SSIFE value is set equal to zero.

PSD Major Source Determination (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Estimated Facility PE before Project Increase	0	16.0	0	0	0	0
PSD Major Source Thresholds	100	100	100	100	100	100
Existing PSD Major Source ? (Y/N)	N	N	N	N	N	N

As shown above, the facility is not an existing PSD Major Source for any regulated NSR pollutant expected to be emitted at this facility.

5. Baseline Emissions (BE)

The BE calculation (in lb/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.

As determined in project N-1112963, each existing emission unit in this facility is considered a Clean Emissions Unit, a Highly Utilized Emissions Unit, or a Fully-Offset Emissions Unit. Therefore, BE is equal to SSPE1 of 38,246 lb-VOC/year.

6. 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."

As shown in Section VII.D.4 of this document, this facility is an existing Major Source for VOC emissions. Therefore, the project's PE2 is compared to the SB 288 Major Modification Thresholds in order to determine if the SB 288 Major Modification calculation is required.

As shown in Section VII.C.1 of this document, the PE2 for this project itself is equal to 31 pounds of VOC per year.

SB 288 Major Modification Thresholds (Existing Major Source)			
Pollutant	Project's PE (lb/year)	Thresholds (lb/year)	SB 288 Major Modification Calculation Required?
VOC	31	50,000	No

As indicate above, the SB 288 Major Modification Threshold for VOC is not surpassed with this project, this project does not constitute an SB 288 Major Modification.

7. 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.

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

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

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

The equipment associated with this project emits only VOC emissions, and assuming the worst-case operating scenario, the PAE is equal to the PE2 for the modified unit. As calculated in Section VII.C.1 of this document, PE2 is equal to 31 pounds VOC per year. The average daily VOC emission is calculated to 0.08 lb-VOC/day (31 lb-VOC/year + 365 day/year).

Pursuant to District Policy APR 1130, *Increases in Maximum Daily Permitted Emissions of Less than or Equal to 0.5 lb/day*, this project does not trigger a Federal Major Modification since the total project annual emissions increase averages less than 0.5 lb-VOC/day and is therefore rounded to zero for the purposes of triggering NSR requirements.

Therefore, this project does not constitute a Federal Major Modification for VOC emissions, and no further analysis is required.

8. 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 pollutants which must be addressed in the PSD applicability determination for sources located in the SJV are: (See 52.21 (b) (23) definition of significant).

The equipment associated to this project emits only VOC emissions.

The facility or the equipment evaluated under this project is listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). The PSD Major Source threshold is 100 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Total PE from the modified unit	0	0.02	0	0	0	0
PSD Major Source Thresholds	100	100	100	100	100	100
New PSD Major Source ? (Y/N)	N	N	N	N	N	N

As shown in the table above, the project potential to emit for the project, by itself, does not exceed any PSD Major Source thresholds. Therefore Rule 2410 is not applicable and no further analysis is required.

VIII.COMPLIANCE

District Rule 2201 New and Modified Stationary Source Review Rule

1. Best Available Control Technology (BACT)

A. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

- 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 a Major Modification.

*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.

As shown in Section I of this document, the facility is proposing the modification of the existing permit unit N-845-23. Additionally, as determined in Sections VII.D.6 and VII.D.7 of this document, this project does not result in an SB 288 Major Modification or Federal Major Modification. Therefore, BACT can only be triggered if the AIPE exceeds 2.0 lb/day for VOC for the modified unit.

As discussed in Section VII.C.3 of this document, AIPE is not greater than 2.0 lb-VOC/day, therefore, BACT is not triggered for this unit.

2. Offsets

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 _x	SO _x	PM ₁₀	CO	VOC
SSPE2	0	0	0	0	38,091
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offset Triggered?	No	No	No	No	Yes

As seen above, the facility is an existing Major Source for 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 VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

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

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 discussed in Section VII.D.5 of this document, BE from all emissions units are equal to the SSPE1, since each unit in the facility is determined as a Clean Emissions Unit, a Highly Utilized Emissions Unit, or a Fully-Offset Emissions Unit.

In addition, there is only one emissions unit associated with this project, and the proposed unit was determined to be a Highly Utilized Emissions Unit in project N-1112963, so the BE is equal to PE1 of this unit. Furthermore, there are no increases in cargo carrier emissions, so ICCE is equal to 0, and DOR is equal to 1. Thus,

$$\begin{aligned}\text{Offsets Required (lb/year)} &= ([\text{PE2} - \text{BE}] + \text{ICCE}) \times \text{DOR} \\ &= ([31 - 186] + 0) \times 1 \\ &= -155 \text{ lb-VOC/year}\end{aligned}$$

As shown above, offset will not be required for this project.

3. Public Notification

District Rule 2201, § 5.4, requires a public notification for the affected pollutants from the following types of projects:

a) New Major Source, Federal Major Modification, and SB 288 Major Modification

This facility is not becoming a new major source, and the proposed project will trigger neither Federal Major Modification nor SB 288 Major Modification. Therefore, public noticing for these purposes is not required.

b) New emission unit with PE > 100 lb/day for any one pollutant

There is no new emission unit with PE > 100 lb/day as a result of this project. Therefore, public noticing for this purpose is not required.

c) Modifications with SSPE1 below an Offset threshold and SSPE2 above an Offset threshold on a pollutant-by-pollutant basis

The proposed project does not result in SSPE from below offset threshold level to above offset threshold level for any one pollutant. Therefore, public noticing for this purpose is not required.

d) New stationary sources with SSPE2 exceeding Offset thresholds

There is no new stationary source with SSPE2 exceeding offset thresholds as a result of this project. Therefore, public noticing for this purpose is not required.

e) Any permitting action with an SSIPE exceeding 20,000 lb/year for any one pollutant

The proposed project does not result in SSIPE exceeding 20,000 lb/year for any one pollutant. Therefore, public noticing for this purpose is not required.

As discussed above, public notification will not be required for these purposes.

4. Daily Emission Limits (DELs)

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. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. Therefore, the following conditions will be listed on the permit to ensure compliance:

- *VOC emissions from this tank shall not exceed 1.6 pounds in any one day. [District Rule 2201]*
- *The maximum throughput shall not exceed 3,826 gallons in any one day and 30,000 gallons in any one rolling 12-month period. [District Rule 2201]*

5. Compliance Assurance

a. Source Testing

No source testing is required to demonstrate compliance with Rule 2201.

b. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

c. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification, and daily emission limit requirements of Rule 2201. Therefore, the following conditions will be listed on the permit to ensure compliance:

- *The permittee shall maintain daily throughput records, in gallons. [District Rule 2201]*
- *The permittee shall maintain cumulative 12-month rolling period throughput records, in gallons, and the records shall be updated at least monthly. [District Rule 2201]*
- *All records shall be maintained on site for a period of at least five years and shall be made available for District, ARB, and EPA inspection upon request. [District Rules 1070 and 4623]*

d. Reporting

No reporting is required to ensure compliance with Rule 2201.

Compliance with the requirements of this rule is expected.

District Rule 2410 Prevention of Significant Deterioration

As demonstrated in Section VII.D.8 of this document, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

District Rule 2520 Federally Mandated Operating Permit

Tesoro possesses a Title V Operating Permit. The proposed modification is considered 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. Therefore, the following conditions will be listed on the permit:

- *{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 NSR Rule]*
- *{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]*

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 major permit modification procedures and a request that such procedures be used (Appendix VI 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.

Tesoro is expected to notify the District by filing the appropriate application forms prior to commencing operation. Therefore, compliance with the requirements of this Rule is expected.

District Rule 4001 New Source Performance Standards (NSPS)

40 CFR Part 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage vessels) for Which Construction after July 23, 1984

§60.110b(a) states except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m^3) (equivalent to 39,890 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

§60.110b(b) states this subpart does not apply to storage vessel with a capacity greater than or equal to 151 m^3 storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m^3 but less than 151 m^3 storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

The capacity of this storage tank is 4,000 gallon (equivalent to 15.1 m^3), which is less than 75 m^3 . Therefore, the requirements of this subpart do not apply to this permit unit, and no further discussion will be required.

District Rule 4002 National Emissions Standards for Hazardous Air Pollutants

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

It was determined in engineering evaluation under District project N-1112963 that the potential emissions from this facility are less than 10 tons per year for any single hazardous air pollutant (HAP) and 25 tons per year for combined HAPs. This project will not result in an increase in

HAP emissions that would affect the previous determination. Therefore, the requirements of this subpart do not apply to this facility, and no further discussion will be required.

40 CFR Part 63 Subpart BBBBBB – Gasoline Distribution Facilities (Bulk Gasoline Terminal and Pipeline Breakout Stations)

§63.11082(a) states the emission sources to which this subpart applies are gasoline storage tanks, gasoline loading racks, vapor collection-equipped gasoline cargo tanks, and equipment components in vapor or liquid gasoline service that meet the criteria specified in Table 1 through 3 to this subpart.

§63.11100 defines Gasoline as any petroleum distillate or petroleum distillate/alcohol blend having a Reid Vapor Pressure (RVP) of 27.6 kilopascals or greater, which is used as a fuel for internal combustion engines.

This storage tank is solely to use for diesel lubricity additive storage and will not be used to store gasoline as defined in §63.11100 of this subpart. Therefore, the requirements of this subpart do not apply to this permit unit, and no further discussion will be required.

District Rule 4101 Visible Emissions

District Rule 4101, 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 Ringelmann 1 or equivalent to 20% opacity. The following condition will be listed on the permit to ensure compliance:

- *{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]*

District 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. The following condition will be listed on the permit to ensure compliance:

- *{98} No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]*

California Health & Safety Code 41700 (Health Risk Assessment)

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 Summary results are as follow:

RMR Summary			
Categories	(Unit 23-2)	Project Totals	Facility Totals
Prioritization Score	0.0	0.0	>1
Acute Hazard Index	0.01	0.01	0.01
Chronic Hazard Index	0.00	0.00	0.00
Maximum Individual Cancer Risk (10^{-6})	0.0	0.0	3.1
T-BACT Required?	No		
Special Permit Conditions?	No		

The acute and chronic hazard indices were below 1.0; and the cancer risk is less than or equal to 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). See detail analysis in Appendix V of this document.

Compliance with the requirement of this rule is expected.

District Rule 4623 Storage of Organic Liquids

This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored.

Section 5.1.1 of this rule requires Group A vessels (capacity 1,100 to 19,800 gallons) storing organic liquid with a TVP of less than 11 psia to serve by pressure-vacuum relief valve, internal floating roof, external floating roof, or vapor recovery system.

This is an existing 4,000 gallons organic liquid (diesel lubricity additive) storage tank, and the applicant proposes to store volatile organic liquid with a maximum true vapor pressure less than 11 psia (equivalent to 75.84 kPa). Therefore, the following condition will be listed on the permit to ensure compliance:

- *This tank shall only store, place, or hold organic liquid with a true vapor pressure (TV) of less than 11 psia under all storage conditions. [District Rule 4623]*

Section 5.2 of this rule requires the pressure vacuum relief valve shall be set to within ten (10) percent of the maximum allowable working pressure of the tank. The pressure vacuum relief valve shall be permanently labeled with the operating pressure settings. The pressure vacuum relief valve shall be properly installed and 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 set pressure.

The applicant proposes to retrofit this existing tank with a pressure vacuum relief valve that set to within ten percent of the maximum allowable working pressure of the tank. The following condition will be listed on the permit to ensure compliance:

- *This tank shall be equipped with a pressure vacuum relief valve that set to within ten percent of the maximum allowable working pressure of the tank. The pressure vacuum*

relief valve shall be permanently labeled with the operating pressure settings. [District Rule 4623]

Section 5.1.3 requires all tanks to be leak-free, as defined by Section 3.17 of the rule. The following condition will be listed on the permit to ensure compliance:

- *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 drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]*

Section 5.7 lists the requirements of the Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program.

The facility elected to include this storage tank in the Voluntary Tank Preventive Inspection & Maintenance, and Tank Interior Cleaning Program on May 12, 2015. Therefore, the following conditions will be listed on the permit to ensure compliance:

- *The owner or operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623] N*
- *Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623] N*
- *Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623] N*
- *Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623] N*

- *Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623] N*
- *If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623] N*
- *Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623] N*
- *The owner or operator shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 4623] N*
- *This tank shall be in compliance with the applicable requirements of District Rule 4623 at all times during draining, degassing, and refilling the tank with an organic liquid having a TVP of 0.5 psia or greater. [District Rule 4623] N*
- *While performing tank cleaning activities, the owner or operators may only use the following cleaning agents: water and clean (produced) water, diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623] N*
- *Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623] N*
- *During sludge removal from tanks containing organic liquids with a true vapor pressure of 1.5 psia or greater, the owner or operator shall vent emissions from the sludge receiving vessel to the vapor recovery system. [District Rules 2201 and 4623] N*
- *The owner or operator shall only transport removed sludge from tanks containing organic liquids with a true vapor pressure of 1.5 psia or greater, in closed, liquid leak-free containers. [District Rule 4623] N*
- *The owner or operator shall store removed sludge from tanks containing organic liquids with a true vapor pressure of 1.5 psia or greater, until final disposal, in vapor leak-free*

containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rule 4623] N

Section 6.2 requires TVP and API gravity testing of stored organic liquid in uncontrolled fixed roof tank.

This is a controlled fixed roof tank. Therefore, this tank is not subject to the requirements of this section.

Section 6.3.1 states operator whose tanks are subject to the requirements of this rule shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and APE gravity. Therefore, the following condition will be listed on the permit to ensure compliance:

- *The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] N*

Section 6.4.8 requires that the measurements of a gas-leak concentration shall be determined by EPA Method 21. Therefore, the following condition will be listed on the permit to ensure compliance:

- *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 drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]*

Compliance with the requirements of this Rule is expected.

California Health & Safety Code 42301.6 (School Notice)

As discussed in Section III of this document, 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 none of the project specific emission unit(s) trigger 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 EPA noticing period, issue Authority to Construct N-845-23-2 subject to the permit conditions on the attached draft Authority to Construct in Appendix I.

X. BILLING INFORMATION

Annual Permit Fees				
Permit Number	Previous Fee Schedule	Fee Schedule	Fee Description	Annual Fee
N-845-23-2	3020-05-A	3020-05-A (Up to 5,000 gallon)	4,000 gallon	\$ 75

APPENDICES

- Appendix I: Draft Authority to Construct (ATC)*
- Appendix II: Existing Permit to Operate (PTO)*
- Appendix III: Pre-Project Potential Emissions – EPA’s Tank 4.0.9.d program reports*
- Appendix IV: Post-Project Potential Emissions – EPA’s Tank 4.0.9.d program reports*
- Appendix V: Risk Management Review (RMR) Summary*
- Appendix VI: Compliance Certification*

Draft Authority to Construct (ATC)

APPENDIX I

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-845-23-2

LEGAL OWNER OR OPERATOR: TESORO LOGISTICS OPERATIONS LLC
MAILING ADDRESS: ATTN: STEPHEN D COMLEY
19100 RIDGEWOOD PARKWAY
SAN ANTONIO, TX 78259

LOCATION: 3003 NAVY DR
STOCKTON, CA 95206

EQUIPMENT DESCRIPTION:
MODIFICATION OF 4,000 GALLON DIESEL LUBRICITY ADDITIVE STORAGE TANK: TO STORE A NEW DIESEL LUBRICITY ADDITIVE, INCREASE THE ANNUAL THROUGHPUT FROM 11,857 GALLONS TO 30,000 GALLONS, AND INSTALL A PRESSURE-VACUUM RELIEF VALVE

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 1.6 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The maximum throughput shall not exceed 3,826 gallons in any one day and 30,000 gallons in any one rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Crude oil (as defined in District Rule 4623, section 3.5) shall not be stored in this tank. [District Rule 4623] Federally Enforceable Through Title V Permit
6. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TV)) of less than 11 psia under all storage conditions. [District Rule 4623] 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 Marjollet, Director of Permit Services

N-845-23-2 May 19 2015 0:20AM - BCW Joint Inspection NOT Required

7. This tank shall be equipped with a pressure vacuum relief valve that set to within ten percent of the maximum allowable working pressure of the tank. The pressure vacuum relief valve shall be permanently labeled with the operating pressure settings. [District Rule 4623] Federally Enforceable Through Title V Permit
8. 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 drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
9. The owner or operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623] Federally Enforceable Through Title V Permit
10. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623] Federally Enforceable Through Title V Permit
11. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623] Federally Enforceable Through Title V Permit
12. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
13. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623] Federally Enforceable Through Title V Permit
14. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623] Federally Enforceable Through Title V Permit
15. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623] Federally Enforceable Through Title V Permit
16. The owner or operator shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 4623] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. This tank shall be in compliance with the applicable requirements of District Rule 4623 at all times during draining, degassing, and refilling the tank with an organic liquid having a TVP of 0.5 psia or greater. [District Rule 4623] Federally Enforceable Through Title V Permit
18. While performing tank cleaning activities, the owner or operators may only use the following cleaning agents: water and clean (produced) water, diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623] Federally Enforceable Through Title V Permit
19. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623] Federally Enforceable Through Title V Permit
20. During sludge removal from tanks containing organic liquids with a true vapor pressure of 1.5 psia or greater, the owner or operator shall vent emissions from the sludge receiving vessel to the vapor recovery system. [District Rule 4623] Federally Enforceable Through Title V Permit
21. The owner or operator shall only transport removed sludge from tanks containing organic liquids with a true vapor pressure of 1.5 psia or greater, in closed, liquid leak-free containers. [District Rule 4623] Federally Enforceable Through Title V Permit
22. The owner or operator shall store removed sludge from tanks containing organic liquids with a true vapor pressure of 1.5 psia or greater, until final disposal, in vapor leak-free containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
23. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623] Federally Enforceable Through Title V Permit
24. The permittee shall maintain daily records of organic liquid loaded into the tank, in gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The permittee shall maintain cumulative 12-month rolling period throughput records, in gallons, and the records shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
26. All records shall be maintained on site for a period of at least of five years and shall be made available for District, ARB, and EPA inspection upon request. [District Rules 1070 and 4623] Federally Enforceable Through Title V Permit

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Existing Permit to Operate (PTO)

APPENDIX II

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-845-23-1

EXPIRATION DATE: 07/31/2017

EQUIPMENT DESCRIPTION:

4,000 GALLON DIESEL LUBRICITY ADDITIVE STORAGE TANK

PERMIT UNIT REQUIREMENTS

1. VOC emissions from this tank shall not exceed 0.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Annual throughput for this tank shall not exceed 11,857 gallons in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
4. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
5. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623, 6.4.2] Federally Enforceable Through Title V Permit
6. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
7. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623, 6.4.5] Federally Enforceable Through Title V Permit
8. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623, 6.3.1] Federally Enforceable Through Title V Permit
9. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
10. The permittee shall maintain daily and cumulative annual throughput records in gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All records shall be maintained on site for a period of at least of five years and shall be made available for District, ARB, and EPA inspection upon request. [District Rules 1070 and 4623, 6.3] Federally Enforceable Through Title V Permit

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

APPENDIX III

Pre-Project Potential Emissions N-845-23-1

EPA's Tank 4.0.9.d reports

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Identification and Physical Characteristics

Identification

User Identification:	Tesoro N845-23-1 Daily PE1
City:	Stockton
State:	California
Company:	Tesoro Logistics Operations LLC
Type of Tank:	Horizontal Tank
Description:	Tank #11 Daily PE1 for Jet Naphtha (JP-4)

Tank Dimensions

Shell Length (ft):	11.00
Diameter (ft):	8.00
Volume (gallons):	3,826.00
Turnovers:	2.96
Net Throughput(gal/yr):	11,857.00
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

Paint Characteristics

Shell Color/Shade:	White/White
Shell Condition	Good

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meteorological Data used in Emissions Calculations: Stockton, California (Avg Atmospheric Pressure = 14.72 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

Tesoro N845-23-1 Daily PE1 - Horizontal Tank
Stockton, California

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Jet naphtha (JP-4)	Jul	72.25	63.02	81.48	61.57	1.6676	1.3907	1.9741	80.0000			120.00	Option 1: VP70 = 1.6 VP80 = 1.9

TANKS 4.0.9d
Emissions Report - Detail Format
Detail Calculations (AP-42)

Tesoro N845-23-1 Daily PE1 - Horizontal Tank
Stockton, California

Month:	January	February	March	April	May	June	July	August	September	October	November	December
Standing Losses (lb):							20.6430	352.1785	0.0234	0.1095	0.7388	
Vapor Space Volume (cu ft):							352.1785	8.0000	10.5878	4.0000	11.0000	
Vapor Density (lb/cu ft):							0.0234	0.1095	0.7388			
Vented Vapor Saturation Factor:							0.7388					
Tank Vapor Space Volume:							352.1785	8.0000	10.5878	4.0000	11.0000	
Tank Diameter (ft):							8.0000	10.5878	4.0000	11.0000		
Effective Diameter (ft):							8.0000	10.5878	4.0000	11.0000		
Vapor Space Outage (ft):							4.0000	10.5878	4.0000	11.0000		
Tank Shell Length (ft):							11.0000	4.0000	10.5878	4.0000		
Vapor Density (lb/cu ft):							0.0234	0.1095	0.7388			
Vapor Molecular Weight (lb/lb-mole):							80.0000	80.0000	80.0000	80.0000	80.0000	80.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):							1.6676	1.6676	1.6676	1.6676	1.6676	1.6676
Daily Avg. Liquid Surface Temp. (deg. F):							531.9229	531.9229	531.9229	531.9229	531.9229	531.9229
Daily Average Ambient Temp. (deg. F):							77.8500	77.8500	77.8500	77.8500	77.8500	77.8500
Ideal Gas Constant R							10.731	10.731	10.731	10.731	10.731	10.731
(psia cu ft / lb-mol-deg R):							521.2356	521.2356	521.2356	521.2356	521.2356	521.2356
Liquid Bulk Temperature (deg. R):							0.1700	0.1700	0.1700	0.1700	0.1700	0.1700
Tank Paint Solar Absorption (Shel):							2.698.0000	2.698.0000	2.698.0000	2.698.0000	2.698.0000	2.698.0000
Daily Total Solar Insolation							0.1095	0.1095	0.1095	0.1095	0.1095	0.1095
Factor (Btu/sqft day):							0.1095	0.1095	0.1095	0.1095	0.1095	0.1095
Vapor Space Expansion Factor:							0.1095	0.1095	0.1095	0.1095	0.1095	0.1095
Daily Vapor Temperature Range (deg. R):							36.9149	36.9149	36.9149	36.9149	36.9149	36.9149
Daily Vapor Pressure Range (psia):							0.5834	0.5834	0.5834	0.5834	0.5834	0.5834
Breather Vent Press. Setting Range(psa):							0.0600	0.0600	0.0600	0.0600	0.0600	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):							1.6676	1.6676	1.6676	1.6676	1.6676	1.6676
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):							1.3907	1.3907	1.3907	1.3907	1.3907	1.3907
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):							1.8741	1.8741	1.8741	1.8741	1.8741	1.8741
Daily Avg. Liquid Surface Temp. (deg. R):							531.9229	531.9229	531.9229	531.9229	531.9229	531.9229
Daily Min. Liquid Surface Temp. (deg. R):							522.6941	522.6941	522.6941	522.6941	522.6941	522.6941
Daily Max. Liquid Surface Temp. (deg. R):							541.1518	541.1518	541.1518	541.1518	541.1518	541.1518
Daily Ambient Temp. Range (deg. R):							33.5000	33.5000	33.5000	33.5000	33.5000	33.5000
Vented Vapor Saturation Factor:							0.7388	0.7388	0.7388	0.7388	0.7388	0.7388
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):							1.6676	1.6676	1.6676	1.6676	1.6676	1.6676
Vapor Space Outage (ft):							4.0000	4.0000	4.0000	4.0000	4.0000	4.0000
Working Losses (lb):							37.6620	80.0000	80.0000	80.0000	80.0000	80.0000
Vapor Molecular Weight (lb/lb-mole):							80.0000	80.0000	80.0000	80.0000	80.0000	80.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):							1.6676	1.6676	1.6676	1.6676	1.6676	1.6676
Net Throughput (gal/mo):							11,857.0000	2,9843	1,0000			
Annual Turnover:							11,857.0000	2,9843	1,0000			
Turnover Factor:							1.0000	1.0000	1.0000	1.0000	1.0000	1.0000

Tank Diameter (ft):	8.0000
Working Loss Product Factor:	1.0000
Total Losses (lb):	58.3050

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: July

Tesoro N845-23-1 Daily PE1 - Horizontal Tank
Stockton, California

Components	Losses(lbs)		
	Working Loss	Breathing Loss	Total Emissions
Jet naphtha (JP-4)	37.66	20.64	58.31

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Identification and Physical Characteristics

Identification

User Identification:	Tesoro N-845-23-2 - Annual PE1
City:	Stockton
State:	California
Company:	Tesoro Logistics Operations LLC
Type of Tank:	Horizontal Tank
Description:	Tank #11 Annual PE1 for Jet Naphtha (JP-4)

Tank Dimensions

Shell Length (ft):	11.00
Diameter (ft):	8.00
Volume (gallons):	3,826.00
Turnovers:	3.10
Net Throughput(gal/yr):	11,857.00
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

Paint Characteristics

Shell Color/Shade:	White/White
Shell Condition	Good

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meteorological Data used in Emissions Calculations: Stockton, California (Avg Atmospheric Pressure = 14.72 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

Tesoro N-845-23-2 - Annual PE1 - Horizontal Tank
Stockton, California

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Jet naphtha (JP-4)	Jan	55.08	51.49	58.97	61.57	1.1524	1.0446	1.2601	80.0000			120.00	Option 1: VP50 = 1 VP60 = 1.3
Jet naphtha (JP-4)	Feb	57.96	53.17	62.75	61.57	1.2387	1.0951	1.3824	80.0000			120.00	Option 1: VP50 = 1 VP60 = 1.3
Jet naphtha (JP-4)	Mar	60.22	54.36	66.07	61.57	1.3065	1.1308	1.4822	80.0000			120.00	Option 1: VP60 = 1.3 VP70 = 1.6
Jet naphtha (JP-4)	Apr	63.26	55.98	70.54	61.57	1.3978	1.1794	1.6162	80.0000			120.00	Option 1: VP60 = 1.3 VP70 = 1.6
Jet naphtha (JP-4)	May	67.10	58.83	75.36	61.57	1.5129	1.2650	1.7607	80.0000			120.00	Option 1: VP60 = 1.3 VP70 = 1.6
Jet naphtha (JP-4)	Jun	70.33	61.45	79.22	61.57	1.6100	1.3435	1.8765	80.0000			120.00	Option 1: VP70 = 1.6 VP80 = 1.9
Jet naphtha (JP-4)	Jul	72.25	63.02	81.48	61.57	1.6676	1.3907	1.9741	80.0000			120.00	Option 1: VP70 = 1.6 VP80 = 1.9
Jet naphtha (JP-4)	Aug	71.45	62.84	80.06	61.57	1.6435	1.3851	1.9032	80.0000			120.00	Option 1: VP70 = 1.6 VP80 = 1.9
Jet naphtha (JP-4)	Sep	69.03	61.28	76.77	61.57	1.5708	1.3385	1.8030	80.0000			120.00	Option 1: VP60 = 1.3 VP70 = 1.6
Jet naphtha (JP-4)	Oct	64.64	58.13	71.16	61.57	1.4393	1.2439	1.6348	80.0000			120.00	Option 1: VP60 = 1.3 VP70 = 1.6
Jet naphtha (JP-4)	Nov	58.87	54.21	63.53	61.57	1.2661	1.1264	1.4058	80.0000			120.00	Option 1: VP50 = 1 VP60 = 1.3
Jet naphtha (JP-4)	Dec	54.66	51.51	58.44	61.57	1.1493	1.0453	1.2533	80.0000			120.00	Option 1: VP50 = 1 VP60 = 1.3

TANKS 4.0.9d Emissions Report - Detail Format Detail Calculations (AP-42)

**Tesoro N-845-23-2 - Annual PE1 - Horizontal Tank
Stockton, California**

Month	January	February	March	April	May	June	July	August	September	October	November	December
Standing Losses (lb):	5.7634	7.5072	10.6987	13.6401	16.9431	18.3935	20.6430	18.6612	15.6633	12.7748	7.9182	5.5313
Vapor Space Volume (cu ft):	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785
Vapor Density (lb/cu ft):	0.0167	0.0178	0.0187	0.0199	0.0214	0.0226	0.0234	0.0231	0.0221	0.0205	0.0182	0.0166
Vapor Space Expansion Factor:	0.0394	0.0539	0.0668	0.0840	0.0957	0.1031	0.1095	0.0999	0.0893	0.0746	0.0522	0.0378
Vented Vapor Saturation Factor:	0.8037	0.7920	0.7831	0.7714	0.7572	0.7455	0.7388	0.7416	0.7502	0.7662	0.7884	0.8041
Tank Vapor Space Volume:												
Vapor Space Volume (cu ft):	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785
Tank Diameter (ft):	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000
Effective Diameter (ft):	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878
Vapor Space Outage (ft):	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000
Tank Shell Length (ft):	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000
Vapor Density												
Vapor Density (lb/cu ft):	0.0167	0.0178	0.0187	0.0189	0.0214	0.0226	0.0234	0.0231	0.0221	0.0205	0.0182	0.0166
Vapor Molecular Weight (lb/lb-mole):	80.0000	80.0000	80.0000	80.0000	80.0000	80.0000	80.0000	80.0000	80.0000	80.0000	80.0000	80.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	1.1524	1.2387	1.3065	1.3978	1.5129	1.6100	1.6676	1.6435	1.5708	1.4393	1.2661	1.1493
Daily Avg. Liquid Surface Temp. (deg. R):	514.7486	517.6279	519.8870	522.9302	526.7651	530.0035	531.9229	531.1191	528.6960	524.3149	518.5391	514.6474
Daily Average Ambient Temp. (deg. F):	45.0000	50.5000	54.0500	59.3000	66.7000	73.3000	77.6500	76.8000	72.7000	64.6500	53.0500	44.9500
Ideal Gas Constant R (psia cu ft / (lb-mol-deg R)):	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731
Liquid Bulk Temperature (deg. R):	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358
Tank Paint Solar Absorbance (Shell):	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700
Daily Total Solar Insulation Factor (Btu/sqft day):	597.0000	939.0000	1,458.0000	2,004.0000	2,435.0000	2,684.0000	2,688.0000	2,368.0000	1,907.0000	1,315.0000	782.0000	538.0000
Vapor Space Expansion Factor												
Vapor Space Expansion Factor:	0.0394	0.0539	0.0668	0.0840	0.0957	0.1031	0.1095	0.0999	0.0893	0.0746	0.0522	0.0378
Daily Vapor Temperature Range (deg. R):	14.3617	19.1576	23.4281	29.1230	33.0466	35.5278	36.9149	34.4557	30.9653	26.0594	18.6263	13.8649
Daily Vapor Pressure Range (psia):	0.2154	0.2874	0.3514	0.4368	0.4957	0.5329	0.5834	0.5181	0.4645	0.3909	0.2794	0.2080
Breather Vent Press. Setting Range (psia):	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	1.1524	1.2387	1.3065	1.3978	1.5129	1.6100	1.6676	1.6435	1.5708	1.4393	1.2661	1.1493
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	1.0446	1.0851	1.1308	1.1794	1.2650	1.3435	1.3907	1.3851	1.3385	1.2439	1.1264	1.0453
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	1.2601	1.3824	1.4822	1.6162	1.7607	1.8765	1.9741	1.9032	1.8030	1.6348	1.4058	1.2533
Daily Avg. Liquid Surface Temp. (deg R):	514.7486	517.6279	519.8870	522.9302	526.7651	530.0035	531.9229	531.1191	528.6960	524.3149	518.5391	514.6474
Daily Min. Liquid Surface Temp. (deg R):	511.1582	512.8385	514.0299	515.6495	518.5034	521.1215	522.6941	522.5052	520.9546	517.8001	513.8825	511.1812
Daily Max. Liquid Surface Temp. (deg R):	518.3391	522.4174	525.7440	530.2110	535.0267	538.8854	541.1516	539.7330	538.4373	530.8298	523.1857	518.1136
Daily Ambient Temp. Range (deg. R):	16.0000	20.4000	22.9000	27.2000	29.8000	31.6000	33.5000	32.2000	30.4000	27.6000	20.7000	15.7000
Vented Vapor Saturation Factor												
Vented Vapor Saturation Factor:	0.8037	0.7920	0.7831	0.7714	0.7572	0.7455	0.7388	0.7416	0.7502	0.7662	0.7884	0.8041
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	1.1524	1.2387	1.3065	1.3978	1.5129	1.6100	1.6676	1.6435	1.5708	1.4393	1.2661	1.1493
Vapor Space Outage (ft):	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000
Working Losses (lb):												
Vapor Molecular Weight (lb/lb-mole):	2.1688	2.3314	2.4589	2.6308	2.8473	3.0301	3.1385	3.0931	2.9563	2.7069	2.3828	2.1631
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	1.1524	1.2387	1.3065	1.3978	1.5129	1.6100	1.6676	1.6435	1.5708	1.4393	1.2661	1.1493
Net Throughput (gal/mo.):	988.0833	988.0833	988.0833	988.0833	988.0833	988.0833	988.0833	988.0833	988.0833	988.0833	988.0833	988.0833
Annual Turnovers:	3.0991	3.0991	3.0991	3.0991	3.0991	3.0991	3.0991	3.0991	3.0991	3.0991	3.0991	3.0991
Turnover Factor:	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000

Tank Diameter (ft):	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000
Working Loss Product Factor:	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Total Losses (lb):	7.9322	9.8386	13.1576	16.2709	19.7904	21.4236	23.7815	21.7543	18.6396	15.4838	10.3020	7.6944

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: January, February, March, April, May, June, July, August, September, October, November, December

Tesoro N-845-23-2 - Annual PE1 - Horizontal Tank
Stockton, California

Components	Losses(lbs)		Total Emissions
	Working Loss	Breathing Loss	
Jet naphtha (JP-4)	31.91	154.16	186.07

Post-Project Potential Emissions N-845-23-2
EPA's Tank 4.0.9.d reports

APPENDIX IV

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Identification and Physical Characteristics

Identification

User Identification:	N-845-23 Daily PE2
City:	Stockton
State:	California
Company:	Tesoro Logistics Operations LLC
Type of Tank:	Horizontal Tank
Description:	Tank #11 Innospec QLI-9103.x

Tank Dimensions

Shell Length (ft):	11.00
Diameter (ft):	8.00
Volume (gallons):	3,826.00
Turnovers:	7.84
Net Throughput(gal/yr):	30,000.00
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

Paint Characteristics

Shell Color/Shade:	White/White
Shell Condition	Good

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meteorological Data used in Emissions Calculations: Stockton, California (Avg Atmospheric Pressure = 14.72 psia)

TANKS 4.0.9d
Emissions Report - Detail Format
Liquid Contents of Storage Tank

N-845-23 Daily PE2 - Horizontal Tank
Stockton, California

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Innospec OLI-9103.x	Jul	72.25	63.02	81.48	61.57	0.4358	0.3425	0.5501	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.1842	0.1205	0.2209	106.1700	0.0990	0.1544	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0042	0.0028	0.0061	128.2000	0.0499	0.0020	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						2.2861	1.8450	2.0093	30.4958	0.5511	0.4522	806.22	
Xylene (-m)						0.1373	0.1004	0.1853	106.1700	0.3000	0.3913	106.17	Option 2: A=7.009, B=1462.266, C=215.11

Tank Diameter (ft):
Working Loss Product Factor:

8.0000
0.7500

Total Losses (lb):

14.7166

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: July

N-845-23 Daily PE2 - Horizontal Tank
Stockton, California

Components	Losses(lbs)		
	Working Loss	Breathing Loss	Total Emissions
Innospec OLI-9103.x	11.67	3.04	14.72
Ethylbenzene	1.80	0.47	2.27
Naphthalene	0.02	0.01	0.03
Unidentified Components	5.28	1.38	6.66
Xylene (-m)	4.57	1.19	5.76

TANKS 4.0.9d
Emissions Report - Detail Format
Tank Identification and Physical Characteristics

Identification

User Identification:	N-845-23 Annual PE2
City:	Stockton
State:	California
Company:	Tesoro Logistics Operations LLC
Type of Tank:	Horizontal Tank
Description:	Tank #11 Immospec QLI-9103.x

Tank Dimensions

Shell Length (ft):	11.00
Diameter (ft):	8.00
Volume (gallons):	3,826.00
Turnovers:	7.84
Net Throughput(gal/yr):	30,000.00
Is Tank Heated (y/n):	N
Is Tank Underground (y/n):	N

Paint Characteristics

Shell Color/Shade:	White/White
Shell Condition	Good

Breather Vent Settings

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meteorological Data used in Emissions Calculations: Stockton, California (Avg Atmospheric Pressure = 14.72 psia)

TANKS 4.0.9d Emissions Report - Detail Format Liquid Contents of Storage Tank

**N-845-23 Annual PE2 - Horizontal Tank
Stockton, California**

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Innospec OLI-9103.x	Jan	55.08	51.49	58.67	61.57	0.2764	0.2503	0.3048	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.0913	0.0802	0.1036	106.1700	0.0990	0.1353	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0020	0.0017	0.0023	128.2000	0.0499	0.0015	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						1.5142	1.3449	1.4543	33.6916	0.5511	0.5223	806.22	
Xylene (-m)						0.0759	0.0666	0.0862	106.1700	0.3000	0.3409	106.17	Option 2: A=7.009, B=1462.266, C=215.11
Innospec OLI-9103.x	Feb	57.96	53.17	62.75	61.57	0.2990	0.2623	0.3400	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.1010	0.0852	0.1193	106.1700	0.0990	0.1385	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0022	0.0018	0.0028	128.2000	0.0499	0.0016	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						1.6261	1.4210	1.5372	33.1705	0.5511	0.5106	806.22	
Xylene (-m)						0.0841	0.0708	0.0965	106.1700	0.3000	0.3493	106.17	Option 2: A=7.009, B=1462.266, C=215.11
Innospec OLI-9103.x	Mar	60.22	54.36	68.07	61.57	0.3177	0.2710	0.3712	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.1094	0.0889	0.1337	106.1700	0.0990	0.1411	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0025	0.0019	0.0032	128.2000	0.0499	0.0016	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						1.7186	1.4790	1.6003	32.7561	0.5511	0.5014	806.22	
Xylene (-m)						0.0911	0.0739	0.1115	106.1700	0.3000	0.3560	106.17	Option 2: A=7.009, B=1462.266, C=215.11
Innospec OLI-9103.x	Apr	63.26	55.88	70.54	61.57	0.3447	0.2833	0.4171	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.1215	0.0942	0.1552	106.1700	0.0990	0.1444	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0028	0.0021	0.0039	128.2000	0.0499	0.0017	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						1.8499	1.5570	1.6856	32.1900	0.5511	0.4889	806.22	
Xylene (-m)						0.1013	0.0784	0.1297	106.1700	0.3000	0.3649	106.17	Option 2: A=7.009, B=1462.266, C=215.11
Innospec OLI-9103.x	May	67.10	58.83	75.36	61.57	0.3813	0.3061	0.4718	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.1384	0.1042	0.1817	106.1700	0.0990	0.1487	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0034	0.0023	0.0046	128.2000	0.0499	0.0018	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						2.0268	1.8733	1.8155	31.4841	0.5511	0.4733	806.22	
Xylene (-m)						0.1155	0.0867	0.1521	106.1700	0.3000	0.3762	106.17	Option 2: A=7.009, B=1462.266, C=215.11
Innospec OLI-9103.x	Jun	70.33	61.45	79.22	61.57	0.4148	0.3284	0.5199	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.1542	0.1141	0.2057	106.1700	0.0990	0.1523	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0039	0.0026	0.0056	128.2000	0.0499	0.0019	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						2.1868	1.7797	1.9354	30.8402	0.5511	0.4801	806.22	
Xylene (-m)						0.1288	0.0951	0.1724	106.1700	0.3000	0.3857	106.17	Option 2: A=7.009, B=1462.266, C=215.11
Innospec OLI-9103.x	Jul	72.25	63.02	81.48	61.57	0.4358	0.3425	0.5501	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.1642	0.1205	0.2209	106.1700	0.0990	0.1544	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0042	0.0028	0.0061	128.2000	0.0499	0.0020	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						2.2861	1.8450	2.0093	30.4858	0.5511	0.4522	806.22	
Xylene (-m)						0.1373	0.1004	0.1853	106.1700	0.3000	0.3913	106.17	Option 2: A=7.009, B=1462.266, C=215.11
Innospec OLI-9103.x	Aug	71.45	62.84	80.06	61.57	0.4269	0.3408	0.5310	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.1599	0.1197	0.2113	106.1700	0.0990	0.1536	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0040	0.0028	0.0058	128.2000	0.0499	0.0020	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						2.2440	1.8303	1.9936	30.6230	0.5511	0.4555	806.22	
Xylene (-m)						0.1337	0.0989	0.1771	106.1700	0.3000	0.3890	106.17	Option 2: A=7.009, B=1462.266, C=215.11
Innospec OLI-9103.x	Sep	69.03	61.28	76.77	61.57	0.4010	0.3270	0.4889	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.1476	0.1135	0.1902	106.1700	0.0990	0.1509	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0036	0.0026	0.0050	128.2000	0.0499	0.0019	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						2.1209	1.7585	1.9133	31.0933	0.5511	0.4654	806.22	

Xylene (-m)						0.1233	0.0945	0.1593	106.1700	0.3000	0.3819	106.17	Option 2: A=7.009, B=1462.266, C=215.11
Innospec OLI-9103.x	Oct	64.64	58.13	71.16	61.57	0.3575	0.3004	0.4238	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.1274	0.1017	0.1684	106.1700	0.0990	0.1460	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0030	0.0023	0.0040	128.2000	0.0489	0.0017	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						1.9122	1.6222	1.7809	31.8265	0.5511	0.4833	806.22	
Xylene (-m)						0.1062	0.0846	0.1324	106.1700	0.3000	0.3690	106.17	Option 2: A=7.009, B=1462.266, C=215.11
Innospec OLI-9103.x	Nov	58.87	54.21	63.53	61.57	0.3084	0.2699	0.3471	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.1043	0.0885	0.1226	106.1700	0.0990	0.1396	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0023	0.0019	0.0029	128.2000	0.0499	0.0016	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						1.6629	1.4536	1.5743	33.0040	0.5511	0.5069	806.22	
Xylene (-m)						0.0888	0.0735	0.1022	106.1700	0.3000	0.3520	106.17	Option 2: A=7.009, B=1462.266, C=215.11
Innospec OLI-9103.x	Dec	54.98	51.51	58.44	61.57	0.2756	0.2505	0.3029	50.0000			207.00	Option 4: RVP=1
Ethylbenzene						0.0909	0.0803	0.1028	106.1700	0.0990	0.1352	106.17	Option 2: A=6.975, B=1424.255, C=213.21
Naphthalene						0.0020	0.0017	0.0023	128.2000	0.0489	0.0015	128.20	Option 2: A=7.37, B=1968.36, C=222.61
Unidentified Components						1.5104	1.3433	1.4528	33.7068	0.5511	0.5227	806.22	
Xylene (-m)						0.0756	0.0666	0.0955	106.1700	0.3000	0.3406	106.17	Option 2: A=7.009, B=1462.266, C=215.11

TANKS 4.0.9d Emissions Report - Detail Format Detail Calculations (AP-42)

**N-845-23 Annual PE2 - Horizontal Tank
Stockton, California**

Month:	January	February	March	April	May	June	July	August	September	October	November	December
Standing Losses (lb):	0.7100	0.9543	1.3940	1.8391	2.3884	2.6995	3.0422	2.7743	2.2605	1.7449	1.0138	0.6800
Vapor Space Volume (cu ft):	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785
Vapor Density (lb/cu ft):	0.0025	0.0027	0.0028	0.0031	0.0034	0.0036	0.0038	0.0037	0.0035	0.0032	0.0028	0.0025
Vapor Space Expansion Factor:	0.0275	0.0382	0.0479	0.0608	0.0701	0.0762	0.0797	0.0740	0.0657	0.0541	0.0371	0.0264
Vented Vapor Saturation Factor:	0.9446	0.9404	0.9369	0.9319	0.9252	0.9192	0.9154	0.9170	0.9216	0.9295	0.9390	0.9448
Tank Vapor Space Volume:												
Vapor Space Volume (cu ft):	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785	352.1785
Tank Diameter (ft):	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000
Effective Diameter (ft):	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878	10.5878
Vapor Space Outage (ft):	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000
Tank Shell Length (ft):	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000	11.0000
Vapor Density												
Vapor Density (lb/cu ft):	0.0025	0.0027	0.0028	0.0031	0.0034	0.0036	0.0038	0.0037	0.0035	0.0032	0.0028	0.0025
Vapor Molecular Weight (lb/lb-mole):	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.2764	0.2990	0.3177	0.3447	0.3813	0.4148	0.4358	0.4269	0.4010	0.3575	0.3064	0.2756
Daily Avg. Liquid Surface Temp. (deg. R):	514.7486	517.6279	519.8870	522.9302	526.7651	530.0035	531.9229	531.1191	528.6980	524.3149	518.5391	514.6474
Daily Average Ambient Temp. (deg. F):	45.0000	50.5000	54.0500	59.3000	66.7000	73.5000	77.6500	78.6000	72.7000	64.5500	53.0500	44.9500
Ideal Gas Constant R (psia cu ft / (lb-mol-deg R)):	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731	10.731
Liquid Bulk Temperature (deg. R):	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358	521.2358
Tank Paint Solar Absorbance (Shell):	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700	0.1700
Daily Total Solar Insolation Factor (Btu/sq ft day):	597.0000	939.0000	1,458.0000	2,004.0000	2,435.0000	2,684.0000	2,688.0000	2,368.0000	1,907.0000	1,315.0000	782.0000	538.0000
Vapor Space Expansion Factor:												
Vapor Space Expansion Factor:	0.0275	0.0382	0.0479	0.0608	0.0701	0.0762	0.0797	0.0740	0.0657	0.0541	0.0371	0.0264
Daily Vapor Temperature Range (deg. R):	14.3617	19.1576	23.4281	29.1230	33.0466	35.5278	36.9149	34.4557	30.9653	26.0594	18.6263	13.8649
Daily Vapor Pressure Range (psia):	0.0544	0.0777	0.1002	0.1338	0.1656	0.1915	0.2076	0.1902	0.1619	0.1234	0.0772	0.0524
Breather Vent Press. Setting Range (psia):	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600	0.0600
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.2764	0.2990	0.3177	0.3447	0.3813	0.4148	0.4358	0.4269	0.4010	0.3575	0.3064	0.2756
Vapor Pressure at Daily Minimum Liquid Surface Temperature (psia):	0.2503	0.2623	0.2710	0.2833	0.3061	0.3284	0.3425	0.3408	0.3270	0.3004	0.2699	0.2505
Vapor Pressure at Daily Maximum Liquid Surface Temperature (psia):	0.3048	0.3400	0.3712	0.4171	0.4718	0.5199	0.5501	0.5310	0.4889	0.4238	0.3471	0.3029
Daily Avg. Liquid Surface Temp. (deg R):	514.7486	517.6279	519.8870	522.9302	526.7651	530.0035	531.9229	531.1191	528.6980	524.3149	518.5391	514.6474
Daily Min. Liquid Surface Temp. (deg R):	511.1582	512.8385	514.0299	515.6495	518.5034	521.1215	522.6941	522.5052	520.9546	517.8001	513.8825	511.1812
Daily Max. Liquid Surface Temp. (deg R):	518.3391	522.4174	525.7440	530.2110	535.0267	538.8854	541.1516	539.7330	536.4373	530.8298	523.1957	518.1136
Daily Ambient Temp. Range (deg. R):	16.0000	20.4000	22.9000	27.2000	29.8000	31.6000	33.5000	32.2000	30.4000	27.5000	20.7000	15.7000
Vented Vapor Saturation Factor:												
Vented Vapor Saturation Factor:	0.9446	0.9404	0.9369	0.9319	0.9252	0.9192	0.9154	0.9170	0.9216	0.9295	0.9390	0.9448
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.2764	0.2990	0.3177	0.3447	0.3813	0.4148	0.4358	0.4269	0.4010	0.3575	0.3064	0.2756
Vapor Space Outage (ft):	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000
Working Losses (lb):	0.6170	0.6673	0.7093	0.7693	0.8511	0.9259	0.9729	0.9530	0.8951	0.7980	0.6840	0.6152
Vapor Molecular Weight (lb/lb-mole):	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000	50.0000
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	0.2764	0.2990	0.3177	0.3447	0.3813	0.4148	0.4358	0.4269	0.4010	0.3575	0.3064	0.2756
Net Throughput (gal/mo.):	2,500.0000	2,500.0000	2,500.0000	2,500.0000	2,500.0000	2,500.0000	2,500.0000	2,500.0000	2,500.0000	2,500.0000	2,500.0000	2,500.0000
Annual Turnovers:	7.8411	7.8411	7.8411	7.8411	7.8411	7.8411	7.8411	7.8411	7.8411	7.8411	7.8411	7.8411
Turnover Factor:	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000

Tank Diameter (ft):	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000	8.0000
Working Loss Product Factor:	0.7500	0.7500	0.7500	0.7500	0.7500	0.7500	0.7500	0.7500	0.7500	0.7500	0.7500	0.7500
Total Losses (lb):	1.3269	1.6216	2.1033	2.6084	3.2395	3.6255	4.0151	3.7272	3.1656	2.5430	1.6678	1.2952

TANKS 4.0.9d
Emissions Report - Detail Format
Individual Tank Emission Totals

Emissions Report for: January, February, March, April, May, June, July, August, September, October, November, December

N-845-23 Annual PE2 - Horizontal Tank
Stockton, California

Components	Losses(lbs)		
	Working Loss	Breathing Loss	Total Emissions
Innospec OLI-9103.x	9.46	21.50	30.96
Ethylbenzene	1.38	3.18	4.56
Naphthalene	0.02	0.04	0.06
Unidentified Components	4.57	10.23	14.80
Xylene (-m)	3.49	8.05	11.54

RMR Summary

APPENDIX V

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Wai-Man So, AQE – Permit Services
 From: Trevor Joy, AQS
 Date: March 17, 2015
 Facility Name: Tesoro Logistics Operations
 Location: 3003 Navy Dr in Stockton
 Application #(s): N-845-23-2
 Project #: 1143723

A. RMR SUMMARY

Categories	Unit 23-2	Project Totals	Facility Totals
Prioritization Score	0.0	0.0	>1
Acute Hazard Index	0.01	0.01	0.01
Chronic Hazard Index	0.00	0.00	0.00
Maximum Individual Cancer Risk (10^{-6})	0.0	0.0	3.1
T-BACT Required?	No		
Special Permit Conditions?	No		

Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

Unit # 23-2

No Special Conditions Required

B. RMR REPORT

I. Project Description

Technical Services received a request on March 122, 2015, to perform a Risk Management Review for the proposed modification to a diesel lubricity additive storage tank, use a different additive and increase the annual processing throughput.

II. Analysis

Technical Services performed a prioritization using the District's HEARTs database. Emissions were supplied by the engineer. In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905, March 2, 2001), risks from the proposed unit's toxic emissions were prioritized using the procedure in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEARTs database. The prioritization score for the facility was greater than 1.0 (see RMR Summary Table). Therefore, a refined analysis was required and performed. AERMOD was used, with the parameters outlined below and concatenated meteorological data for Stockton 2009 to 2013 to determine the maximum dispersion factor at the nearest residential and business receptors. These dispersion factors were input into the HARP model to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Analysis Parameter Unit 23-2			
Closest Receptor -- Business (m)	1296	Closest Receptor -- Resident (m)	201
Diesel Lubricity Additive Storage Operation (lbs/hr)	1.494	Diesel Lubricity Additive Storage Operation (lbs/yr)	31
Area Source Length (m)	3.3	Area Source Width (m)	2.4
Release Ht (m)	2.4		

III. Conclusion

The acute and chronic hazard indices were below 1.0; and the cancer risk is less than or equal to 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).**

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on page 1 of this report must be included for this proposed unit.

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:

- A. RMR request from the project engineer
- B. Prioritization score with toxic emissions summary
- C. HARP Risk Report

Compliance Certification

APPENDIX VI

