



NOV 10 2014

Mr. Glen Mears
Plains Marketing, LP
3600 Bowman Ct
Bakersfield, Ca 93308

**Re: Notice of Minor Title V Permit Modification
District Facility # S-1199
Project # 1144030**

Dear Mr. Mears:

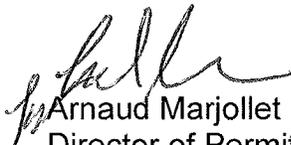
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) S-1199-20-2 into the Title V operating permit. The ATC authorizes an increase in the number of disconnects from 10 to 30 per day.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct (ATC) S-1199-20-2, emissions increase, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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
www.valleyair.org

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

www.healthyliving.com

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1144030

Engineer: Richard Edgehill
Date: October 27, 2014

Facility Number: S-1199
Facility Name: Plains Marketing, LP
Mailing Address: 3600 Bowman Ct
Bakersfield, CA 93308

RWK
11-7-14

Contact Name: Glen Mears
GAMears@paalp.com
Phone: (661) 368-7919 (GM)
Title: SR Environmental Specialist
Responsible Official: Darren Palmer

I. PROPOSAL

Plains Marketing, LP (Plains) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) S-1199-20-2 into the Title V permit. The ATC increases the number of disconnects from 10 to 30 per day.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The facility is located at the Pentland Pump Station in Maricopa SE Section 10, T11N, R23W.

III. EQUIPMENT DESCRIPTION

S-1199-20-3: CRUDE OIL UNLOADING RACK #227 WITH PUMP AND ASSOCIATED HOSES, VALVES, FLANGES, AND THREADED CONNECTIONS

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The proposed draft PTO includes all of the conditions listed on the current PTO except that Condition # 6 of the draft PTO lists 30 per day (updated from 10 per day).

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, 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.

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

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and

3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit
- B. Authority to Construct
- C. Emissions Increase
- D. Application
- E. Previous Title V Operating Permit

ATTACHMENT A
Proposed Modified Title V Operating Permit
No.
S-1199-20-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1199-20-3

EXPIRATION DATE: 05/31/2016

SECTION: SE10 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

CRUDE OIL UNLOADING RACK #227 WITH PUMP AND ASSOCIATED HOSES, VALVES, FLANGES, AND THREADED CONNECTIONS

PERMIT UNIT REQUIREMENTS

1. Unloading Rack 227 shall be used only for unloading. [District Rule 2201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Transfer rack shall be maintained and operated in accordance with the manufacturer's specifications, and operated such that there are no leaks or excess organic liquid drainage at disconnections as defined herein. [District Rule 4624] Federally Enforceable Through Title V Permit
4. All liquids and gases from the unload operation shall be routed to one of the following systems: a vapor collection and control system; a fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); a floating roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a closed VOC emission control system. [District Rules 4623 and 4624] Federally Enforceable Through Title V Permit
5. A floating roof container that meets the applicable control requirements of Section 5.0 of Rule 4623 (Storage of Organic Liquids) shall be considered not leaking when receiving unloaded liquids for compliance with Rule 4624. [District Rule 4624] Federally Enforceable Through Title V Permit
6. Total number of disconnects shall not exceed 30 per day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. During hose disconnects the maximum liquid spillage for liquids shall not exceed 10 milliliters/disconnect based on an average from 3 consecutive disconnects. [District Rule 2201 and 4624] Federally Enforceable Through Title V Permit
8. Emissions from light liquid components shall not exceed 0.3 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall maintain accurate component count and emissions calculated using CAPCOA Average Emission Factors for Marketing Terminals, from California Implementation Guidelines for Estimating Emissions of Fugitive Hydrocarbon Leaks at Marketing Terminals, Table IV-2b, February 1999. [District Rule 2201] Federally Enforceable Through Title V Permit
10. For this Class 1 organic liquid transfer operation, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District Rule 4624] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

11. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute; or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above a background as methane when measured in accordance with the test method in Section 6.3.8 or alternative method approved in writing by the APCO and EPA. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from equipment into a container is not considered a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4624] Federally Enforceable Through Title V Permit
12. Permittee shall inspect the unloading rack for leaks during transfer at least once every calendar quarter using the test method prescribed in Section 6.3.8 of Rule 4624 or alternative method approved in writing by the APCO and EPA. [District Rule 4624] Federally Enforceable Through Title V Permit
13. An operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during the inspections required under provisions of Sections 5.9.1 and 5.9.2 of Rule 4624 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency shall revert back to quarterly and the operator shall contact the APCO in writing within 14 days. [District Rule 4624] Federally Enforceable Through Title V Permit
14. Corrective steps shall be taken at any time the operator observes a leak or excess drainage at disconnect. All equipment found leaking shall be repaired or replaced within 72 hours. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replaced equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624] Federally Enforceable Through Title V Permit
15. All inspections shall be documented with an inspection log. Inspection records shall include, at a minimum, 1) date of inspection, 2) location and description of any missing, loose, leaking, or damaged equipment and any malfunction requiring repair, 3) corrective steps taken to repair or replace the equipment, 4) test method and results for leak and drainage inspections, 5) location and description of any equipment to be inspected upon commencing operation after repair or replacement and 6) inspector name and signature. [District Rule 4624] Federally Enforceable Through Title V Permit
16. Permittee shall keep records of daily unloading rack throughput and the results of any required leak inspections. [District Rule 4624] Federally Enforceable Through Title V Permit
17. Permittee shall keep records of daily number of truck unloading disconnects. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
18. Records shall be retained for a minimum of five years and shall be made readily available to the APCO, ARB, or EPA during normal business hours and submitted upon request to the APCO, ARB, or EPA. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B
Authority to Construct No.
S-1199-20-2

AUTHORITY TO CONSTRUCT

PERMIT NO: S-1199-20-2

ISSUANCE DATE: 10/14/2014

LEGAL OWNER OR OPERATOR: PLAINS MARKETING LP
MAILING ADDRESS: ATTN: JEREMY WIGGINS
3600 BOWMAN CT
BAKERSFIELD, CA 93308

LOCATION: PENTLAND PUMP STATION
MARICOPA, CA

SECTION: SE10 TOWNSHIP: 11N RANGE: 23W

EQUIPMENT DESCRIPTION:

MODIFICATION OF CRUDE OIL UNLOADING RACK #227 WITH PUMP AND ASSOCIATED HOSES, VALVES, FLANGES, AND THREADED CONNECTIONS: INCREASE NUMBER OF DISCONNECTS FROM 10 TO 30/DAY

CONDITIONS

1. Unloading Rack 227 shall be used only for unloading. [District Rule 2201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Transfer rack shall be maintained and operated in accordance with the manufacturer's specifications, and operated such that there are no leaks or excess organic liquid drainage at disconnections as defined herein. [District Rule 4624] Federally Enforceable Through Title V Permit
4. All liquids and gases from the unload operation shall be routed to one of the following systems: a vapor collection and control system; a fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); a floating roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a closed VOC emission control system. [District Rules 4623 and 4624] Federally Enforceable Through Title V Permit
5. A floating roof container that meets the applicable control requirements of Section 5.0 of Rule 4623 (Storage of Organic Liquids) shall be considered not leaking when receiving unloaded liquids for compliance with Rule 4624. [District Rule 4624] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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.

Sayed Sadredin, Executive Director / APCO

Arnaud Marjolle, Director of Permit Services

S-1199-20-2 : Oct 27 2014 2:33PM -- EDGEHILL : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

6. Total number of disconnects shall not exceed 30 per day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. During hose disconnects the maximum liquid spillage for liquids shall not exceed 10 milliliters/disconnect based on an average from 3 consecutive disconnects. [District Rule 2201 and 4624] Federally Enforceable Through Title V Permit
8. Emissions from light liquid components shall not exceed 0.3 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
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10. For this Class 1 organic liquid transfer operation, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District Rule 4624] Federally Enforceable Through Title V Permit
11. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute; or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above a background as methane when measured in accordance with the test method in Section 6.3.8 or alternative method approved in writing by the APCO and EPA. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from equipment into a container is not considered a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4624] Federally Enforceable Through Title V Permit
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18. Records shall be retained for a minimum of five years and shall be made readily available to the APCO, ARB, or EPA during normal business hours and submitted upon request to the APCO, ARB, or EPA. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

| | SSIPE (lb/yr) | | | | |
|-------------|---------------|-----|----|-----|------|
| | NOx | VOC | CO | SOx | PM10 |
| S-1199-20-2 | 0 | 147 | 0 | 0 | 0 |

ATTACHMENT D

Application

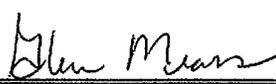
San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED
OCT 20 2014
SJVAPCD
Southern Region

Permit Application For:

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

| | |
|---|--|
| 1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">PLAINS MARKETING, L.P.</p> | |
| 2. MAILING ADDRESS: STREET/P.O. BOX: <u>BAK-00 ACCOUNTS PAYABLE / PO BOX 4648</u> CITY: <u>HOUSTON</u> STATE: <u>TX</u> 9-DIGIT ZIP CODE: <u>77210-4648</u> | |
| 3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>PENTLAND PUMP STATION</u> CITY: <u>MARICOPA</u> SE <u> </u> ¼ SECTION <u> 10 </u> TOWNSHIP <u> 11N </u> RANGE <u> 23W </u> | INSTALLATION DATE: |
| 4. GENERAL NATURE OF BUSINESS: <u>CRUDE OIL PIPELINE</u> | |
| 5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) CERTIFICATE OF CONFORMITY AND IMPLEMENTATION OF THE FOLLOWING ATC INTO THE FACILITY TITLE V PERMIT: <u>S-1199-20-2</u> | |
| 6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;">GLEN MEARS</p> | TITLE OF APPLICANT: <p style="text-align: center;">SR. ENVIRONMENTAL SPECIALIST</p> |
| 7. SIGNATURE OF APPLICANT:  | DATE: <u>10/20/14</u> PHONE: (661) 368-7919 FAX: (661) 746-4037 EMAIL: <u>GAMears@paalp.com</u> |

For APCD Use Only:

EnviroTech

| | |
|------------|---|
| DATE STAMP | FILING FEE RECEIVED : <u>\$ 19</u> CHECK#: <u>4442</u> DATE PAID: <u>PM 10/30/14</u> PROJECT NO: <u>S-1144030</u> FACILITY ID: <u>S-1199</u> |
|------------|---|

RECEIVED

OCT 20 2014

SJVAPCD
Southern Region

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

SIGNIFICANT PERMIT MODIFICATION
 MINOR PERMIT MODIFICATION

ADMINISTRATIVE
AMENDMENT

| | |
|--|----------------------|
| COMPANY NAME: PLAINS MARKETING L.P. | FACILITY ID: S- 1199 |
| 1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> Utility | |
| 2. Owner's Name: PLAINS MARKETING, L.P. | |
| 3. Agent to the Owner: | |

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

Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

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

Darren Palmer
Signature of Responsible Official

10/20/14
Date

Darren Palmer

Name of Responsible Official (please print)

District Manager - Bakersfield Office

Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit No.'s
S-1199-20-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1199-20-1

EXPIRATION DATE: 05/31/2016

SECTION: SE10 **TOWNSHIP:** 11N **RANGE:** 23W

EQUIPMENT DESCRIPTION:

CRUDE OIL UNLOADING RACK #227 WITH PUMP AND ASSOCIATED HOSES, VALVES, FLANGES, AND THREADED CONNECTIONS

PERMIT UNIT REQUIREMENTS

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