



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street  
San Francisco, CA 94105-3901**

December 16, 2009

Susan McLaughlin  
Supervising Air Quality Engineer  
Yolo-Solano Air Quality Management District  
1947 Galileo Ct., Ste 103  
Davis, CA 95618

Re: EPA Comments on Proposed Renewal of Title V Operating Permit for Equilon Enterprises

Dear Ms. McLaughlin:

Thank you for the opportunity to review the Yolo-Solano Air Quality Management District's ("District") proposed title V operating permit renewal for Equilon Enterprises, a petroleum bulk storage and loading terminal operation located in West Sacramento, CA.

We have enclosed our comments, which focus on carbon adsorber monitoring requirements under the Compliance Assurance Monitoring ("CAM") regulations. As we discussed with your staff, we look forward to working with the District to develop appropriate CAM conditions for inclusion in the final permit. Please contact Roger Kohn at (415) 972-3973 or [kohn.roger@epa.gov](mailto:kohn.roger@epa.gov) if you have any questions concerning our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerardo C. Rios".

Gerardo C. Rios  
Chief, Permits Office  
Air Division

**EPA Region 9 Comments**  
**Equilon Enterprises LLC**  
**Permit No. F-00386-3**

1. As we have discussed with your staff, the proposed permit lacks Compliance Assurance Monitoring (“CAM”) requirements for the carbon adsorption unit that controls VOC emissions from the loading rack. The permit contains only two CAM conditions (II.D.4. and E.4.1.). These conditions incorporate by reference two sections of the CAM regulations, §64.7 and §64.9. These sections of Part 64 merely contain generic requirements for the operation of approved monitoring, and reporting and record-keeping requirements. The District cannot satisfy CAM requirements by simply incorporating sections of Part 64 into the permit. Rather, Part 64 requires that sources submit CAM plans, and that permitting authorities develop CAM conditions based on these plans and discussions with sources.

The CAM plan included in Equilon’s permit renewal application proposes only to track when the adsorber is in use, and does not propose any indicator ranges or excursion definitions. We understand the source has contacted the District and intends to submit a revised CAM plan. The District must review the revised plan and add CAM conditions to the permit that ensure that the adsorber is monitored to ensure it operates properly. At a minimum, the final permit must contain all required CAM elements, including an indicator range(s), a monitoring frequency (at least once per 24 hours), appropriate record-keeping requirements, a definition of excursion (or exceedance), and appropriate compliance certification language.<sup>1</sup> We believe the District should include a regeneration or replacement cycle as part of the CAM requirements for this unit based on the manufacturer’s operation manual, requiring the towers to switch operation (e.g. stripping or absorbing) based on criteria such as a specific period of time or when there is a certain pressure build-up in the absorbing unit. We note that the source’s original CAM plan states that carbon will be “replaced when breakthrough is determined.” CAM for this type of control device should ensure that breakthrough does not occur. For more information and an example of CAM for a carbon adsorber on a loading rack, please see the example on this EPA webpage: <http://www.epa.gov/ttn/emc/cam/camsupp2.pdf>.

2. The statement of basis contains at least three inaccurate statements about versions of rules in the YSAQMD portion of the California State Implementation Plan (“SIP”):
  - The District states that the version of Rule 2.23 (Fugitive Hydrocarbon Emissions) adopted on August 13, 1997 is in the SIP; but the SIP version of this rule was adopted on March 23, 1994.
  - The District states that the version of Rule 3.1 (General Permit Requirements) adopted on February 23, 1994 is in the SIP; however the SIP does not contain any version of this rule.

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<sup>1</sup> Part 70 was revised when Part 64 was promulgated. One of the changes was to §70.6(c)(5)(iii), which now requires that annual compliance certifications “identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under part 64 of this chapter occurred.” The District must include this language in this and other title V permits with emission units subject to CAM.

- The District states that the version of Rule 3.4 (New Source Review) adopted on August 13, 1997 is in the SIP; but the SIP version of this rule was adopted on December 11, 1996.

The District should correct these statements and compare current versions of applicable rules with versions in the SIP to ensure that the final permit accurately reflects the content of SIP rules. Region 9 maintains a database of federally enforceable SIP rules on its website, which District permit writers may find useful when verifying SIP requirements. See [www.epa.gov/region09/air/sips/index.html](http://www.epa.gov/region09/air/sips/index.html).

3. The annual compliance certification requirement in this and all District permits must state that “based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete;” in accordance with Rule 3.8 (section 302.14). The District must add this language to one of the conditions in section IV.N. of the permit.