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EQUIPMENT LOCATION:

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EQUIPMENT DESCRIPTION

<i>Application No.</i>	<i>Equipment</i>	<i>Action</i>
553898	TV Renewal	TV Renewal
555222	CAM Plan	Approve CAM Plan

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INTRODUCTION/BACKGROUND:

This is an existing facility applying for a Title V permit renewal. Initial TV was issued 1/26/09 under A/N 339365 with subsequent revisions. Application for renewal (A/N 553898) was submitted 07/02/13.

SFPP Orange owns and operates a petroleum products distribution terminal facility. Equipment at the facility include:

- One vertical fixed roof tank
- Two internal floating roof tanks
- Seven external floating roof tanks
- One oil water separator with sump
- One waste/oil water separation system
- Two loading racks
- One ethanol unloading rack
- One sump
- One vapor recovery system

Along with this TV renewal application, there is also an application for a CAM Plan (A/N 555222).

APPLICABLE NSPS/NESHAP RULES:

- 40 CFR 60 Subpart IIII
- 40 CFR 60 Subpart JJJJ
- 40 CFR 60 Subpart K
- 40 CFR 60 Subpart Ka
- 40 CFR 60 Subpart Kb
- 40 CFR 60 Subpart XX
- 40 CFR 63 Subpart BBBB
- 40 CFR 64 (CAM)

RECOMMENDATION:

Issue a TV renewal after 30-day public comment period and 45 day EPA review period. Include CAM Plan with this renewal.

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A/N 555222 CAM Plan

INTRODUCTION:

Application No.555222 was submitted on 08/09/13 to comply with the requirements of 40 CFR 64, Continuous Assurance Monitoring (CAM).

The CAM rule contains specific federal monitoring requirements for process equipment which is vented by air pollution control systems where the facilities are major sources, as defined in Title V (Reg 30).

A 63 MMBtu per hour VRS thermal oxidizer identified under A/N 482011:G28981 is the air pollution control equipment venting VOC emissions from the operation of the two loading racks. A source test conducted on the thermal oxidizer on January 31, 2013 showed a VOC control efficiency of 99.9%.

Current permit conditions limit the total facility loading to 3,300,000 gpd (CARB limit) and 63,000,000 gal/month (offset limit). The VOC limit is limited to 0.045 lb/1000 gallons loaded.

A permit condition (as shown on the "Recommendation" section below will be imposed on the VRS thermal oxidizer to comply with the requirements of 40 CFR 64, Continuous Assurance Monitoring, (CAM).

CAM REQUIREMENTS:

A CAM plan must:

- a. Describe the indicators to be monitored;
- b. Describe the ranges or the process to set indicator ranges;
- c. Describe the performance criteria for the monitoring, including
 - specifications for obtaining representative data
 - verification procedures to confirm the monitoring's operational status
 - quality assurance and control procedures
 - monitoring frequency
 - 4 times per hour (minimum) if post control emissions are equal to or exceed the major source threshold
 - 1 time per day (minimum) if post control emissions are less than the major source threshold
 - data averaging period;
- d. Provide a justification for the use of parameters, ranges, and monitoring

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- approach;
- e. Provide emissions test data; and, if necessary,
 - f. Provide an implementation plan for installing, testing, and operating the monitoring.

Permits are required to have the following items:

- a. The approved monitoring approach, including the indicators - or the means to measure the indicators - to be monitored;
- b. A definition of exceedances or excursions;
- c. The duty to conduct monitoring;
- d. Minimum data availability and averaging period requirements; and
- e. Milestones for testing, installation, or final verification.

MAJOR SOURCE THRESHOLDS:

The applicable Major Source Threshold (MST) in this case is VOC with the following controlled and uncontrolled emissions. Controlled emissions are based on permit conditions limiting VOC emissions. The emission levels (maximum annual PTE) attributed to the subject sources, and the corresponding minimum monitoring intervals are indicated in the following table:

Evaluation of Monitoring Requirements

Device	A/N and/or P/O	VOC, R1, tons/year (max PTE)	VOC, R2, tons/year (max PTE)	MST tons/year	Proposed Monitoring Requirement
VRS Thermal Oxidizer	482011 (G28981)	340.2	17 (@95% DRE)	10	Continuous monitoring of combustion chamber temperature

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“Applicable” Regulations, Emission Limits, and Monitoring Requirements

CONTROL DEVICE	RULES	CONTAMINANT	CONTROLLED EMISSIONS LIMIT
VRS Thermal Oxidizer (venting loading racks)	SCAQMD 1303(b)(2)-Offsets	VOC	0.045 lb/1000 gal
	40CFRSubpart XX	VOC	35 mg/L
	SCAQMD Rule 462	VOC	0.08 lb/1000 gal

MONITORING APPROACH

The key elements of the monitoring approach are presented below:

A. Indicators

Minimum combustion chamber temperature of 1400 degrees Fahrenheit in the VRS thermal oxidizer.

B. Measurement Approach

Temperature measuring and recording system to continuously measure and record the combustion chamber temperature with an accuracy of within 1% of the temperature being monitored

C. Indicator Range

The operator shall review the records of the combustion chamber temperature on a daily basis to determine if deviation occurs or install an alarm system to alert the operator when a deviation occurs. Whenever a deviation occurs, the operator shall inspect the equipment to identify the cause of such a deviation, take immediate corrective action to maintain the combustion temperature at or

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above 1400 degrees Fahrenheit and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

D. QIP (Quality Improvement Plan) Threshold

The semi-annual monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period. The operator shall submit an application with a Quality Improvement Plan (QIP) if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

E. Performance Criteria

Data Representativeness:	The temperature measuring and recording system to continuously measure and record the combustion chamber temperature of the equipment.
Verification of Operational Status:	The temperature measuring and recording system shall have an accuracy of within 1% of the temperature being monitored and shall be inspected, maintained and calibrated on an annual basis.
QA/QC Practice and Criteria:	The temperature measuring and recording system shall be inspected, maintained and calibrated on an annual basis.
Monitoring Frequency and Data Collection Procedure:	The temperature measuring and recording system continuously measures and records the combustion chamber temperature of the equipment.

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RECOMMENDATION

Approve CAM Plan under A/N 555222, include 40 CFR 64 in Section I, and add/update with the following condition(s) to A/N 482011.

Condition (A/N 482011:P/O G28981) VRS

THE OPERATOR SHALL OPERATE AND MAINTAIN THIS EQUIPMENT ACCORDING TO THE FOLLOWING REQUIREMENTS:

THE COMBUSTION CHAMBER TEMPERATURE SHALL BE MAINTAINED AT A MINIMUM OF 1,400 DEGREES FAHRENHEIT (ON A 15-MINUTE AVERAGE) WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION, EXCEPT FOR PERIODS OF START-UP AND SHUTDOWN. START-UP IS DEFINED AS THE PERIOD FROM IGNITION TO THE TIME WHEN 1400 DEGREES FAHRENHEIT IS ACHIEVED, NOT TO EXCEED 30 MINUTES. SHUTDOWN IS DEFINED AS THE PERIOD FROM WHEN THE VAPOR VALVE BEGINS TO SHUT AND IS COMPLETELY CLOSED SHUT, NOT TO EXCEED 30 MINUTES.

THE OPERATOR SHALL OPERATE AND MAINTAIN A TEMPERATURE MEASURING AND RECORDING SYSTEM TO CONTINUOUSLY MEASURE AND RECORD THE COMBUSTION CHAMBER TEMPERATURE PURSUANT TO THE OPERATION AND MAINTENANCE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.7. SUCH A SYSTEM SHALL HAVE AN ACCURACY OF WITHIN 1% OF THE TEMPERATURE BEING MONITORED AND SHALL BE INSPECTED, MAINTAINED, AND CALIBRATED ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER’S SPECIFICATIONS USING AN APPLICABLE AQMD OR EPA APPROVED METHOD.

FOR THE PURPOSE OF THIS CONDITION, A DEVIATION SHALL BE DEFINED AS WHEN A COMBUSTION CHAMBER TEMPERATURE OF LESS THAN 1,400 DEGREES FAHRENHEIT OCCURS DURING NORMAL OPERATION OF THE EQUIPMENT IT SERVES. THE OPERATOR SHALL REVIEW THE RECORDS OF THE COMBUSTION CHAMBER TEMPERATURE ON A DAILY BASIS TO DETERMINE IF A DEVIATION OCCURS OR SHALL INSTALL AN ALARM SYSTEM TO ALERT THE OPERATOR WHEN A DEVIATION OCCURS.

WHENEVER A DEVIATION OCCURS, THE OPERATOR SHALL INSPECT THIS EQUIPMENT TO IDENTIFY THE CAUSE OF SUCH A DEVIATION, TAKE IMMEDIATE CORRECTIVE ACTION TO MAINTAIN THE COMBUSTION CHAMBER TEMPERATURE AT OR ABOVE 1,400 DEGREES FAHRENHEIT, AND KEEP RECORDS OF THE DURATION AND CAUSE (INCLUDING UNKNOWN CAUSE, IF APPLICABLE) OF THE DEVIATION AND THE CORRECTIVE ACTION TAKEN.

ALL DEVIATIONS SHALL BE REPORTED TO THE AQMD ON A SEMI-ANNUAL BASIS PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT. THE SEMI-ANNUAL MONITORING REPORT SHALL INCLUDE THE TOTAL OPERATING TIME OF THIS EQUIPMENT AND THE TOTAL ACCUMULATED DURATION OF

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ALL DEVIATIONS FOR EACH SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT.

THE OPERATOR SHALL SUBMIT AN APPLICATION WITH A QUALITY IMPROVEMENT PLAN (QIP) IN ACCORDANCE WITH 40 CFR PART 64.8 TO THE AQMD IF AN ACCUMULATION OF DEVIATIONS EXCEEDS 5 PERCENT DURATION OF THIS EQUIPMENT'S TOTAL OPERATING TIME FOR ANY SEMI-ANNUAL REPORTING PERIOD SPECIFIED IN CONDITION NO. 23 IN SECTION K OF THIS PERMIT. THE REQUIRED QIP SHALL BE SUBMITTED TO THE AQMD WITHIN 90 CALENDAR DAYS AFTER THE DUE DATE FOR THE SEMI-ANNUAL MONITORING REPORT.

THE OPERATOR SHALL INSPECT AND MAINTAIN ALL COMPONENTS OF THIS EQUIPMENT ON AN ANNUAL BASIS IN ACCORDANCE WITH THE MANUFACTURER'S SPECIFICATIONS.

THE OPERATOR SHALL KEEP ADEQUATE RECORDS IN A FORMAT THAT IS ACCEPTABLE TO THE AQMD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE REQUIREMENTS SPECIFIED IN THIS CONDITION AND 40 CFR PART 64.9 FOR A MINIMUM OF FIVE YEARS.

[RULE 463, 1303(a)(1)-BACT, 1303(b)(2)-OFFSETS, 3004(a)(4)-PERIODIC MONITORING, 40CFR PART 64]