



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

STATIONARY SOURCE COMPLIANCE DIVISION

APPLICATION PROCESSING AND CALCULATIONS

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**Permit to Operate / No Permit To Construct
- Modification -
A/N 543096**

COMPANY NAME: Chevron Products Company

MAILING ADDRESS: 324 W. El Segundo Blvd.
El Segundo, CA 90245

EQUIPMENT LOCATION: 324 W. El Segundo Blvd.
El Segundo, CA 90245

BACKGROUND / SUMMARY:

In 2007, Chevron installed additional roof support columns and modified the pontoon roof accordingly on Internal Floating Roof (IFR) Storage Tank No. 290 (D1327) without first obtaining a permit to construct. The changes to the tank/roof are summarized in the table below.

Roof Opening/Fitting or Seal	Tank 290	
	Current	Previous
Access Hatch (Bolted Cover, Gasketed)	1	1
Automatic Gauge Float Well (Bolted Cover, Gasketed)	1	1
Gauge Hatch-Sample Well (Weighted Mechanical Actuation, Gasketed)	2	2
Vacuum Breaker (Weighted Mechanical Actuation, Gasketed)	2	1
Deck Drain (3 in. Diameter/90% Closed)	24	0
Fixed Roof Support Column & Well (Gasketed Sliding Cover)	16	1
Roof Leg (Adjustable, Pontoon Area, Sock)	0	12
Roof Leg (Adjustable, Center Area, Sock)	0	26
Roof Leg (Fixed)	90	0
Slotted Guidepole (Gasketed Sliding Cover w/Pole Sleeve and Wiper)	1	1
Primary Seal/Mechanical Shoe	1	1
Secondary Seal/Rim Mounted	1	1

Chevron also requests to modify the vapor pressure and throughput limits for this tank as follows:

- Reduce the vapor pressure limit from 10.99 psia to 7.24 psia.
- Increase the throughput limit in condition C1.130 from 76,042 bbl/month to 136,288 bbl/month.

The 10.99 psia vapor pressure limit is not currently specified in the RECLAIM/Title V permit but the tank is a post-NSR tank with a maximum potential to emit (PTE) based on a commodity with a true vapor pressure of 10.99 psia.

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EQUIPMENT DESCRIPTION:

Tank No. 290 is currently listed in Section D of the RECLAIM/Title V Facility Permit. A permit to operate (without a permit to construct) is proposed for issuance in Section D of the RECLAIM/Title V Facility Permit. The proposed permit pages are contained in this section. In these proposed permit pages, new text is indicated by underline and deleted text is indicated by strikeout. Modified conditions are indicated by parenthesis.

Section D: Facility Description and Equipment Specific Conditions

Description	ID No.	Connected To	RECLAIM Source Type	Emissions and Requirements	Conditions
Process 16: Storage Tanks					P13.1
System 2: Internal Floating Roof Tank					S13.3
STORAGE TANK, INTERNAL FLOATING ROOF, TANK NO. 290, INTERNALLY HEATED, 55625 BBL; DIAMETER: 115 FT ; HEIGHT: 29 FT 7.5 IN WITH FLOATING ROOF, PONTOON PRIMARY SEAL, CATEGORY A, MECHANICAL SHOE SECONDARY SEAL, CATEGORY A, RIM MOUNTED, WIPER TYPE GUIDEPOLE, SLOTTED, WITH GASKETED SLIDING COVER, POLE SLEEVE AND WIPER A/N: <u>465461</u> <u>543096</u>	D1327			BENZENE: (10) [40CFR 61 SUBPART FF, #2, 12-4-2003]; HAP: (10) [40CFR 63 Subpart CC, #2, 6-23-2003]	<u>B22.34</u> , (C1.130), C6.1, E71.58, H23.17, K67.64, K171.23

PROCESS CONDITIONS

P13.1 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Benzene	40CFR61	Subpart FF

[40CFR 61 Subpart FF, 12-4-2003]

[Processes subject to this condition: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, **16**]

SYSTEM CONDITIONS:

S13.3 All devices under this system are subject to the applicable requirements of the following rules or regulations:

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Contaminant	Rule	Rule/Subpart
VOC	District Rule	463
VOC	District Rule	1149
VOC	District Rule	1178

[RULE 1149, 5-2-2008; **RULE 1178, 4-7-2006; RULE 463, 5-6-2005**]

[Systems subject to this condition: **Process 16, System 1, 2, 3, 5**]

DEVICE CONDITIONS

B22.34 The operator shall only use this equipment with materials having a(n) true vapor pressure of 7.24 psia or less under actual operating conditions.

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition: **D1327**]

C1.130 The operator shall limit the throughput to no more than ~~76,042~~ 136,288 barrel(s) in any one calendar month.

The operator shall calculate the throughput, in barrels, by the following equation: $0.14 \times D \times D \times L$, where D is the diameter of the tank in feet based on the tank strapping chart and L is the total vertical one-way roof travel in feet per month.

The operator shall install and maintain an automatic tank level gauge (ATLG) and recorder to continuously record the vertical movement of the roof. For the purpose of this condition, continuous recording is defined as once per hour.

The operator shall calculate the total one-way roof movement, in feet, on a daily and monthly basis.

The ATLG installed shall be verified once per quarter by comparing against a manual tank level measurement. If the ATLG differs from the manual tank level measurement by more than 1.0 inch or 0.8%, whichever is greater, the ATLG shall be repaired and put back into service within 10 days. While the ATLG is being repaired, the throughput shall be determined by the hourly tank level data averaged from the previous 30 days prior to the discovery of the discrepancy.

In the event of a failure or routine maintenance of the ATLG, the ATLG shall be repaired (if necessary) and put back into service within 10 days of the time that the ATLG failed or was removed from service for maintenance. While the ATLG is being repaired or maintained, the throughput shall be determined by the hourly tank level data averaged from the previous 30 days prior to the time that the ATLG went out of service.

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition: **D1327**]

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C6.1 The operator shall use this equipment in such a manner that the organic vapor concentration being monitored, as indicated below, does not exceed 30 percent of the Lower Explosive Limit.

The operator shall use an explosimeter or equivalent to monitor the vapor space above the internal floating roof.

The operator shall monitor at least twice a year between 4 to 8 months apart.

[**RULE 463, 5-6-2005**; RULE 463, 11-4-2011]

[Devices subject to this condition: D1269, D1319, D1321, D1323, D1326, **D1327**, D1330, D1335, D1336, D1337, D4224]

E71.58 The operator shall only use this equipment for the storage of any of the following commodities: Gas Oil; Light, Moderate and Heavy Cycle Oil; and Recovered Oil.

[**RULE 1303(b)(2)-Offset, 5-10-1996**; RULE 1401, 3-4-2005]

[Devices subject to this condition: **D1327**]

H23.17 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Benzene	40CFR61, Subpart	FF
VOC	40CFR60, Subpart	Kb

[**40CFR 60 Subpart Kb, 10-15-2003**; **40CFR 61 Subpart FF, 12-4-2003**]

[Devices subject to this condition: D1269, D1323, **D1327**, D1335, D1336, D1347, D1348, D1352, D1367, D1374, D1394, D1401, D1402, D1413, D1414, D1415, D1459, D1465, D1473, D1608, D1609, D1610, D1611, D1612, D1613, D1614, D1615, D1616, D1617, D4119, D4121, D4123, D4125, D4127, D4129, D4131, D4133, D4135, D4137, D4139, D4141, D4143, D4145, D4147, D4149, D4151, D4153, D4155, D4157, D4159, D4161, D4163, D4165, D4167, D4169, D4171, D4173, D4175, D4177, D4179, D4181, D4183, D4185, D4187, D4189, D4191, D4193, D4195, D4197]

K67.64 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Tank throughput in barrels per calendar month.

Commodity/product stored and time period of its storage.

Actual vapor pressure, in psia, of each commodity/product stored.

Hydrocarbon concentration measurements done in the vapor space above the floating roof of the tank.

Other records that may be required to comply with the applicable requirements of District Rules 463, 1149, 1178, 40CFR60 Subpart Kb, 40CFR61 Subpart FF and 40CFR63, Subpart CC.

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[RULE 1149, 5-2-2008; **RULE 1178, 4-7-2006**; **RULE 463, 5-6-2005**; **40 CFR 60 Subpart Kb, 10-15-2003**; **40CFR 61 Subpart FF, 12-4--2003**; **40CFR 63 Subpart CC, 6-23-2003**]

[Devices subject to this condition: D1323, **D1327**, D1335, D1465, D1473]

K171.23 Final drawings and/or specifications of the modification done to the storage tank shall be submitted to the District within 30 days after its completion.

[**RULE 1178, 4-7-2006**]

[Devices subject to this condition: **D1327**, D1352]

[**Note:** Chevron provided these drawings, which were required under PC/PO A/N 465461.]

FEE ANALYSIS

Summary of Fee Analysis

A/N	Equipment Description (Based on BCAT/CCAT)	BCAT/ CCAT	Fee Schedule	Fee Type	Fiscal Year (1)	Fee
543096	Storage Tank FX RF w/Int Float Roof – Crude	231906 (BCAT)	C	Modification	12-13	\$ 3,440.06
				POnoPC (2)	12-13	\$ 1,720.03
				Expedited Processing	12-13	\$ 1,720.03
543097	RECLAIM/Title V Permit	555009 (BCAT)	na.	RECLAIM/Title V Permit Revision	12-13	\$ 1,789.12
				Total Fees		\$ 8,669.24
				Fees Paid (2)		\$ 8,669.24
				Outstanding Balance		\$ 0.00

(1) Based on the date that the application was submitted.

(2) Per Rule 301(c)(1)(D)(i), 50% additional fee is required for modification of a permit unit without first obtaining an permit to construct.

PERMIT HISTORY

A history of previous permits for the subject storage tank is contained in the table below.

Permit History for Tank 290 (D1327)

Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
127064	12/24/84	M49487	5/07/86	Installed a floating roof inside this existing riveted shell fixed roof tank, which was previously Rule 219 exempt due to the storage of very low vapor pressure materials.
394000	na.	F47365	12/18/01	Admin application: Corrected the roof height based n the most recent strapping chart and removed “riveted, internally heated” from the roof description.
465461	3/16/07	F89096	3/16/07	PC/PO for installation of a slotted guidepole with

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Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
				gasketed sliding cover, pole sleeve and wiper.
543096	na.	TBD	TBD	Installed 15 additional roof columns and modified roof fittings/openings without a PC and requested to decrease TVP limit from 10.99 psia to 7.24 psia and increase throughput limit from 76,042 bbl/month to 136,288 bbl/month.

COMPLIANCE RECORD REVIEW

There are no ongoing violations for any of the equipment covered in this evaluation.

PROCESS DESCRIPTION:

A description of each of the subject internal floating roof tank is contained in the equipment description above. The proposed permit will limit the tank to storage of Gas Oil, Light Cycle Oil, Moderate Cycle Oil, Heavy Cycle Oil and Recovered Oil with maximum true vapor pressure (TVP) of 7.24 psia and maximum throughput of 136,288 barrels in any one calendar month.

CALCULATION

Criteria Air Pollutant And Toxic Air Contaminant (TAC) emission estimates are contained in this section.

Criteria Air Pollutants

The only criteria air pollutant emitted by the subject tank is VOC. The storage tank has previously been subject to NSR so the net VOC emission change is calculated according to Rule 1306(d)(2) as the post-modification maximum potential to emit (PTE) calculated pursuant to 1306(b) minus the pre-modification maximum PTE. The post-modification maximum potential VOC emission for the tank is based on the current roof configuration and the proposed throughput and vapor pressure limits. The pre-modification maximum potential VOC emission for the tank is based on the roof configuration prior to the subject modifications and the current throughput limit and a vapor pressure of 10.99, which is the highest vapor pressure allowed under Rule 463 for an internal floating roof tank.

EPA Tanks 4.0.9d is utilized for all calculations. Gas Oil is utilized for all calculations since it is the permitted commodity with the highest VOC and toxic air contaminant (TAC) emissions potential. The pre- and post-modification maximum potential VOC emissions for the tank and the resulting change in VOC emissions are shown in the table below.



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Change in Maximum Potential VOC Emissions Due to Storage Tank Roof Modifications and Increase in Throughput and Vapor Pressure Limits

Tank No	Pre-Modification (1)				Post-Modification (2)				VOC Emission Change
	T'put	TVP	Estimated Emissions		T'put	TVP	Estimated Emissions		
	bbl/year	psia	lb/yr	lb/day (3)	bbl/year	psia	lb/yr	lb/day (3)	lb/day (3)
290	912,504	10.99	11692.	32.48	1,642,656	7.24	12021.	33.39	+ 0.91

- (1) Pre-modification maximum PTE is based on roof configuration prior to modifications and current throughput and vapor pressure limits.
- (2) Post-modification maximum PTE is based on current roof configuration and proposed throughput and vapor pressure limits.
- (3) 30-day average = Annual emissions / 360

Toxic Air Contaminants

Gas Oil is the commodity with the highest concentration of each of the TACs listed below. Therefore, it has the highest health risk potential.. The TAC content of Gas Oil, which is shown in the table below, is not expected to change.

Toxic Air Contaminant	Mass Percent in Reformate
1,3 Butadiene	0.0007
Benzene	0.82
Ethylbenzene	1.79
Hexane (-n)	3.66
Napthalene	0.595
Toluene	6.83
Xylene	10.02

EPA Tanks 4.0.9d was utilized to estimate pre- and post-modification TAC emissions. The maximum potential pre- and post-modification TAC emissions are shown in the table below.

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Tank 290: Increase in Max. Potential TAC Emissions due to Tank Roof Modifications and Change in T'put & VP Limits

Toxic Air Contaminant	Estimated Max. Potential TAC Emissions (lb/yr)		TAC Emission Increase	
	Pre-Modification	Post-Modification	lb/yr	lb/hr
1,3 Butadiene	0.46	0.72	0.26	2.97E-05
Benzene	23.46	36.59	13.1	1.50E-03
Ethylbenzene	6.50	10.46	4.0	4.57E-04
Hexane (-n)	167.0	260.0	93.0	1.06E-02
Napthalene	0.53	0.95	0.42	4.79E-05
Toluene	61.57	97.0	35.4	4.04E-02
Xylene	31.85	51.54	19.7	2.25E-03

RULE EVALUATION

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq., requires that the environmental impacts of proposed “projects” be evaluated and that feasible methods to reduce, avoid or eliminate significant adverse impacts of these projects be identified and implemented. According to the District’s CEQA Guidelines, the net emission increase thresholds for significant effect are: ROG (VOC) - 55 lb/day; PM10 - 50 lb/day; CO - 274 lb/day.

CEQA analysis is not required since the increase in VOC emissions is less than the 55 lb/day significance threshold and there are no other significant environmental impacts. On the 400-CEQA forms, Chevron marked “No” to all of the additional criterion that may trigger CEQA. For these reasons, CEQA does not apply.

Regulation II: Permits

Rule 212: Standards for Approving Permits

212(c)(1): Public notice is required for a project if any of the modified permit units are located within 1000 feet of a school. Public notice is not required under this clause since Storage Tank No. 290 is located more than 1000 feet from the nearest school.

212(c)(2): Public notice is required for any “new or modified facility”, which has on-site emission increases exceeding any of the daily maximums specified in subdivision (g) of Rule 212. The 212(g) emission thresholds are shown in the table below. Public notice is not required under this clause since the VOC emission increase is less than the Rule 212(g) threshold of 30 lb/day.



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Air Contaminant	R212(g) Daily Maximum Threshold (lb/day)
CO	220
NOx	40
PM10	30
SOx	60
VOC	30
Lead	3

1) Increase in 30-day average maximum potential to emit.

212(c)(3): Public notice is required for any new or modified permit units that have an increase in toxic air contaminants that results in an increase of maximum individual cancer risk (MICR) of more than one in a million (1×10^{-6}) during a lifetime (70 years). As discussed in additional detail in the evaluation of Rule 1401, the tank and roof modifications and proposed permit limits changes do not cause an increase in MICR of more than 1×10^{-6} . Public notice is not required under this clause.

212(g): 212(g) specifies that any new or modified sources subject to Regulation XIII which undergo construction or modifications resulting in an emissions increase exceeding any of the daily maximum emission thresholds (listed in the table above) will require notification. From Regulation XIII (Rule 1302), the definition of "Source" is any permitted individual unit, piece of equipment, article, machine, process, contrivance, or combination thereof, which may emit or control an air contaminant. This includes any permit unit at any non-RECLAIM facility and any device at a RECLAIM facility.

Public notice is not required under this clause since the increase in VOC emissions is less than the Rule 212(g) threshold of 30 lb/day.

Regulation IV: Prohibitions

Rule 401: Visible Emissions

This rule specifies that a person shall not discharge emissions from a source for a period or periods aggregating more than three minutes in any one hour which are as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or emissions of such opacity that it obscures an observers view to an equal or greater level. This is equivalent to opacity of 20%.

Operation of the subject tank is not expected to cause any visible emissions. Compliance with this rule is expected.

Rule 402: Nuisance

This rule requires that a person not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any

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considerable number of persons or to the public, or which cause, or have a natural tendency to cause injury or damage to business or property.

This tank does not have a history of causing nuisance. The tank modifications along with the proposed condition changes are not expected to significantly impact nuisance potential. Compliance is expected.

Rule 463: Storage of Organic Liquids

This rule applies to any above-ground stationary tank with a capacity of 75,000 liters (19,815 gallons) or greater used for storage of organic liquids, and any above-ground tank with a capacity between 950 liters (251 gallons) and 75,000 liters (19,815 gallons) used for storage of gasoline.

463(c)(2)(B) requires that an internal floating roof tank shall have a closure device which consists of either a single liquid mounted primary seal or a primary and a secondary seal. The subject tank is equipped with a mechanical shoe primary seal and rim mounted secondary seal.

463(c)(2)(B) also requires that all roof openings and fittings shall be fully gasketed or controlled in a manner specified by the Executive Officer. All roof opening and fittings on the subject tank meet this requirement.

463(d)(1) requires a pressure-vacuum valve to be set within 10 percent of the maximum working pressure of the tank, for storage tanks between 251 and 19, 815 gallons. This requirement does not apply to the subject tank since its capacity is greater than 19,815 gallons.

463(d)(2) requires the roof to float on the stored organic liquid at all time, except when emptied for cleaning or repair. The applicant is expected to comply with this requirement.

463(d)(3) requires that a tank that has been gas-freed and is to be refilled with gasoline, the roof shall be refloated with water or by an equivalent procedure approved by the Executive Officer. The tank does not store gasoline. This paragraph does not apply.

463(d)(4) limits the maximum vapor pressure to no more than 11 psia. The permit this tank will include condition B22.34, which limits the tanks to the storage of commodities with vapor pressure less than 7.24 psia at actual storage conditions. Compliance with this requirement is expected.

463(d)(5) requires replacement seals to be chosen from a list approved by the Executive Officer. The applicant is expected to comply with this requirement.

463(e) contains self inspection requirements and *463(f) contains* reporting requirements. Compliance with these inspection and reporting requirements is expected.

Regulation IX: Standards of Performance for New Stationary Sources (NSPS)

40CFR60: Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

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Applicable facilities under this subpart are storage vessels with a capacity greater than 10,568 gallons that are used to store volatile organic liquids (VOL's) for which construction, reconstruction, or modification is commenced after July 23, 1984.

This tank became subject to this regulation under PC A/N 127064, which was issued in December 1984. For this PC, Chevron installed an internal floating roof to permit the storage of higher vapor pressure materials with a resulting increase in maximum hourly VOC emissions. The permit for this tank includes condition H23.17, which denotes the applicability of this regulation.

The primary requirements of this regulation are specified in §60.112b(a)(1). Compliance with these requirements is discussed below.

60.112b(a)(1) - A fixed roof in combination with an internal floating roof shall meet the following specifications:

- (ii) Each internal floating roof (IFR) shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
 - (A) A foam- or liquid-filled seal mounted in contact with the liquid.
 - (B) Two seals mounted one above the other so that each forms a continuous closure.
 - (C) A mechanical shoe seal.

The IFR on this tank complies with both B and C.

- (iii) Each opening in a noncontact IFR except for automatic bleeder vents (vacuum breaker vents) and the rim space vents shall provide a projection below the liquid surface.

All openings in this non-contact IFR except for the automatic bleeder vents (vacuum breaker vents) provide a projection below the liquid surface.

- (iv) Each opening in the IFR except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.

The IFR complies with this requirement.

- (v) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating

The automatic bleeder vents (vacuum breaker vents) on the IFR are equipped with a gasket and are closed at all times when the roof is floating.

- (vi) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

The IFR on this tank does not have a rim vent.

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- (vii) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.

The sample well is equipped with a slit fabric cover that covers at least 90% of the opening.

- (viii) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

Each support column well in the IFR of this tank is equipped with a gasketed sliding cover.

- (ix) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

This tank does not have a ladder well.

40CFR61: Subpart FF: National Emission Standard for Benzene Waste Operations

This tank is subject to this regulation so it must meet the requirements of this rule as a waste management unit. Each tank utilized as a waste management unit under this regulation must either have a fixed roof with a closed vent system meeting the standards of 61.343 or have an internal floating roof tank that meets the standards of 40CFR60.112b(a)(1) [NSPS Subpart Kb], or have an external floating roof tank that meets the 40CFR60.112b(a)(2) [NSPS Subpart Kb].

As discussed above, this tank meets the standards of 40CFR60.112b(a)(1) [NSPS Subpart Kb]. Compliance with the requirements of this regulation is expected.

Regulation X: National Emission Standards for Hazardous Air Pollutants (NESHAPS)

40CFR63: Subpart CC: National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries

This Subpart applies to petroleum refining sources and related emission sources that are specified in section 63.640 (c) (5) through (c) (7) [e.g. miscellaneous process vents (except for FCCU, SRU, and CRU vents), storage vessels, wastewater stream, equipment leaks, gasoline loading racks, marine vessel loading, etc.] that are located in a major source and emit or have equipment contacting one or more of the hazardous air pollutants (HAPs) listed in Table 1 of this subpart. This subpart took effect on August 18, 1998 and was last amended on October 28, 2009.

The definition of a Group 2 storage Vessel is any “storage vessel that does not meet the definition of a Group 1 storage vessel.” A Group 1 storage vessel is defined as a “storage vessel at an existing source that has a design capacity greater than or equal to 177 cubic meters (46728 gallons) and stored-liquid maximum vapor pressure greater than or equal to 10.4 kilopascals (1.5

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psia) and stored-liquid annual average TVP greater than or equal to 8.3 kilopascals (1.2 psia) and annual average HAP liquid concentration greater than 4 percent by weight total organic HAP.”

This storage tank has historically stored Light Cycle Oil (LCO). It was the only commodity stored in the tank for the last four quarters. The TVP for LCO is less than 0.1 psia and the HAP content is less than 0.5%. Therefore, the tank is a Group 2 storage tank since the stored-liquid annual average TVP is well below 1.2 psia and the annual average TVP is well below 4%.

63.640(n)(1) specifies that a Group 1 or Group 2 storage vessel that is part of an existing source and is also subject to the provisions of 40CFR60, Subpart Kb, is required only to comply with the requirements of 40CFR Subpart Kb. This tank qualifies for this exemption.

Regulation XI: Source Specific Standards

Rule 1149: Storage Tank Degassing (May 2, 2008)

1149(c)(1) contains the requirement that VOC emissions be controlled during cleaning /degassing activities for all tanks that meet the specified volume / vapor pressure thresholds. The threshold levels are:

- Volume ≥ 500 gallons and < 26,420 gallons with Reid vapor pressure (RVP) > 3.9 psi, or
- Volume ≥ 26,420 gallons and < 100,000 gallons with Reid vapor pressure (RVP) > 2.6 psi, or
- Volume ≥ 100,000 gallons with RVP > 0.5 psi

This tank will be subject to the cleaning/degassing requirements of this rule during storage of some of the permitted commodities. Modification of the TVP and throughput limits does not impact compliance with the requirements of this regulation. Compliance is expected.

Rule 1178: Further Reductions of VOC emissions from Storage Tanks at Petroleum Facilities

This rule is applicable to this facility since it is a petroleum refinery with facility wide VOC emissions exceeding the 20 ton/year VOC threshold. This rule applies to all aboveground storage tanks that have capacity equal to or greater than 75,000 liters (19,815 gallons), are used to store organic liquids with a TVP greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions.

This tank is subject to the requirements of this regulation since it has a capacity greater than 19,815 gallons and stores some organic liquids with a TVP greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions. The requirements for internal floating roof tanks are specified in 1178(d)(3). As shown in the tables below, this tank complies with these requirements.

Tank 290: Summary of Roof Opening / Fitting Controls and Seals

Roof Opening / Fitting or Seal Type	Roof Seal and Opening/Fitting Configuration for Tank 290		Applicable Rule 1178 Citation
	No	Type	
Access Hatch	1	Cover: bolted & gasketed	1178(d)(3)(C) & 1178(d)(1)(A)(i)



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Roof Opening / Fitting or Seal Type	Roof Seal and Opening/Fitting Configuration for Tank 290		Applicable Rule 1178 Citation
	No	Type	
Automatic Gauge Float Well	1	Cover: bolted & gasketed	1178(d)(3)(C) & 1178(d)(1)(A)(i)
Fixed Roof Support Column & Well	16	Gasketed Sliding Cover	1178(d)(3)(A)
Gauge Hatch / Sample Well	2	Weighted mechanical actuation; Cover: gasketed.	1178(d)(3)(C) & 1178(d)(1)(A)(ii)
Vacuum Breaker	2	Weighted mechanical actuation; Gasketed	1178(d)(3)(C) & 1178(d)(1)(A)(v)
Roof Drain	24	Slotted membrane fabric cover that covers at least 90 percent of the area of the opening.	1178(d)(3)(C) & 1178(d)(1)(A)(vi)
Slotted Guidepole	1	Gasketed sliding cover with pole wiper and pole sleeve	1178(d)(3)(C) & 1178(d)(1)(A)(ix) & 1178(d)(1)(A)(x)
Primary Seal	1	Mechanical Shoe	1178(d)(3)(D) & 1178(d)(1)(B)(i)
Secondary Seal	1	Rim mounted and shall not be attached to the primary seal.	1178(d)(3)(D) & 1178(d)(1)(B)(ii)

The rule does not contain any requirements for fixed roof legs. Compliance with the requirements of this regulation is expected.

Regulation XIII: New Source Review

As specified in Rule 1301, Regulation XIII, sets forth pre-construction review requirements for new, modified, or relocated facilities, to ensure that the operation of such facilities does not interfere with progress in attainment of the national ambient air quality standards (NAAQS), and that future economic growth within the South Coast Air Quality Management District (District) is not unnecessarily restricted. The specific air quality goal of this regulation is to achieve no net increases from new or modified permitted sources of nonattainment air contaminants or their precursors.

The South Coast Air Basin (SOCAB) is designated in attainment of the NAAQSs for CO, NOx and SOx. The following are currently considered nonattainment air contaminants that are subject to new source review (NSR): NOx, SOx, PM_{2.5}, PM₁₀, and VOC. NOx and VOC are included since they are precursors for ozone. NOx, SOx and VOC are included as PM_{2.5} and PM₁₀ precursors.

NSR requirements for these nonattainment pollutants are specified in the following rules:

- Rule 1303 – PM10 and VOC (all facilities); NOx and SOx (non-RECLAIM facilities)
- Rule 1325 – PM2.5
- Rule 2005 – NOx and SOx (RECLAIM facilities)

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Since Chevron is a RECLAIM facility, it is subject to the NSR requirements for NO_x and SO_x specified in Rule 2005 of the RECLAIM regulation (Regulation XX). Sources that emit ammonia, CO, and Ozone Depleting Compounds (ODCs) are subject to only the BACT requirements of Rule 1303 for these pollutants.

Rule 1303: Requirements

This rule requires the Executive Officer to deny a Permit to Construct for any new, modified or relocated source which results in an emission increase of CO, PM₁₀, VOC, any ozone depleting compound, or ammonia, unless BACT is used. This rule also requires modeling for a net increase in PM₁₀ and offset (among other requirements) for a net increase in PM₁₀ or VOC emissions for any new or modified source.

The subject storage tank does not emit ammonia, ODCs, CO, PM₁₀, NO_x or SO_x. Therefore, it is only subject to NSR (R1303) requirements for VOC. As shown in the *Calculation Section*, the modifications cause an increased in estimated VOC emissions of 0.91 lb/day.

1303(a) - Best Available Control Technology (BACT): Any new or modified source which results in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia, must employ BACT for the new or relocated source or for the actual modification to an existing source. Per District policy, BACT is required for any increase in emissions that exceeds 1.0 lb per day on a maximum daily basis.

This tank is not subject to BACT for VOC since the VOC emission increase is less than 1.0 lb per day.

1303(b) – The following requirements apply to any new or modified source which results in a net emission increase of any nonattainment air contaminant.

1303(b)(1): Modeling - The applicant must substantiate with modeling that the new facility or modification will not cause a violation, or make significantly worse an existing violation of any state or national ambient air quality standards at any receptor location in the District. According to 1306(b), the new total emissions for modified sources shall be calculated on a pound per day basis for determination of BACT and modeling applicability. The modeling procedures are discussed in Appendix A to the rule. It is specified in Appendix A that modeling is not required for VOC or SO_x.

Modeling is not required for the subject storage tank since it emits only VOC.

1303(b)(2): Offsets – Unless exempt from offsets requirements pursuant to Rule 1304, emission increases shall be offset by either Emission Reduction Credits approved pursuant to Rule 1309, or by allocations from the Priority Reserve. Per District policy, Offsets are required for any increase in emissions that is equal to or greater than 0.42 lb per day on a 30-day average basis. Since the refinery is located in the South Coast Air Basin (SOCAB), an offset ratio of 1.2-to-1.0 is required.

The VOC emission offset requirements are shown in the table below.

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Tank No.	Max. Potential VOC Emission Increase (lb/day)(1)	VOC Emission Increase with Offset Ratio (lb/day) (2)	VOC ERCs Required (lb/day)(3)
290	0.91	1.09	1

(1) 30-day average

(2) Max. potential VOC emission increase times 1.2

(3) Rounded to nearest whole number.

1303(b)(3) - Sensitive Zone Requirements: This section pertains to Emission Reduction Credits (ERCs) for facilities in the South Coast Air Basin (SOCAB). Except for credits that are obtained from the Priority Reserve, facilities are subject to the Sensitive Zone requirements (H&SC Section 40410.5) for ERCs. A facility in zone 1 may obtain ERCs originated in zone 1 only, and a facility in zone 2A may obtain ERCs from either zone 1 or zone 2A.

The El Segundo Refinery is located in Zone 1. Chevron will utilize ERC certificate no. AQ011196 or an ERC derived from AQ011196 to offset the VOC emission increase. These ERCs were originally generated under ERC certificate number AQ001497 in 1995 for shutdown of two degreasers at an ALCOA facility (ID 017418) located in Vernon, which is in Zone 1.

1303(b)(4) - Facility Compliance: The facility must be in compliance with all applicable rules and regulations of the District. Enforcement records were reviewed to determine current facility compliance status. According to the best knowledge of this reviewer, the Chevron El Segundo Refinery is currently in compliance with all applicable rules and regulations of the District.

1303(b)(5) - Major Polluting Facilities: Any new major polluting facility (source) or major modification at an existing major polluting facility (source) must comply with the requirements of this section. A major modification is defined in 1302(r) as any modification at an existing major source that will cause

- an increase of one pound per day or more, of the facility's potential to emit (PTE) for NOx or VOC if the facility is located in the SOCAB, or
- an increase of 40 tons per year or more, of the facility's PTE for SOx, or
- an increase of 15 tons per year or more, of the facility's PTE for PM₁₀; or,
- an increase of 50 tons per year or more, of the facility's PTE for CO.

The tank modifications and proposed vapor pressure and throughput limit changes do not constitute a major modification as defined in this rule since the VOC emission increase is less than 1.0 lb/day. Therefore, the requirements of this section are not applicable

Rule 1325: Federal PM2.5 New Source Review Program

This NSR rule, which addresses the emission of PM2.5 and its precursors NOx and SO2, was adopted by the District's Governing Board on June 3, 2011. The subject storage tank is not subject to any requirements under this regulation since it does not emit PM2.5, NOx or SO2.

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Regulation XIV: Toxic Air Contaminants

Rule 1401 New Source Review of Toxic Air Contaminants

Requirements – Rule 1401 contains the following requirements:

(d)(1) MICR and Cancer Burden - The cumulative increase in MICR which is the sum of the calculated MICR values for all toxic air contaminants emitted from the new, relocated or modified permit unit will not result in any of the following:

- (A) an increased MICR greater than one in one million (1.0×10^{-6}) at any receptor location, if the permit unit is constructed without T-BACT;
- (B) an increased MICR greater than ten in one million (1.0×10^{-5}) at any receptor location, if the permit unit is constructed with T-BACT;
- (C) a cancer burden greater than 0.5.

(d)(2) Chronic Hazard Index - The cumulative increase in total chronic HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.

(d)(3) Acute Hazard Index - The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.

Analysis – A Tier 2 Screening Analysis was performed. The nearest residential and commercial receptors are more than 550 and 750 meters away, respectively. The results of the screening analysis are shown in the table below. Since the Cancer/Chronic and Acute Screening Indexes are less than 1.0 and the MICR is less than one in a million, compliance with this rule is achieved.

Summary Results of Tier 2 Screening Analysis

Tank No.	Chronic/Cancer Screening Index	Acute Screening Index	MICR	
			Residential	Commercial
290	3.06E-05	2.43E-05	3.65E-08	4.99E-09

Regulation XVII - Prevention of Significant Deterioration (PSD)

The PSD program is the federal New Source Review (NSR) program for pollutants for which an area is in attainment with or unclassified with respect to a National Ambient Air Quality Standard (NAAQS) and for Greenhouse Gases (GHGs).

Rule 1703 – PSD Analysis (& Associated Rules 1701, 1702, 1704, 1706, 1710 & 1713)

These rules contain the PSD requirements for attainment pollutants and selected unclassified pollutants. As discussed earlier, SOCAB is currently designated as attainment with NAAQSs for SO₂, NO₂, CO, and Lead. The subject tank is not subject to any requirements under this regulation since it does not emit CO, NO₂, SO₂, or Lead.

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Rule 1714 – Prevention of Significant Deterioration for Greenhouse Gases

This rule sets forth preconstruction review requirements for greenhouse gases (GHG), which is defined as an aggregate group of six GHGs: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride.

According to §52.21(b)(49)(i) – (v), the pollutant GHG is subject to requirements under this regulation if either of the following applies:

- A stationary source, which is an existing major stationary source for a regulated non-GHG NSR pollutant, undertakes a “major modification” that subjects the source to PSD permitting requirements for a non-GHG NSR pollutant and the modification will result in an emission increase and net emission increase of at least 75,000 tpy on a CO₂e basis and 0 tpy on a mass basis.
- A stationary source, which is an existing major stationary source that emits or has the potential to emit 100,000 tpy CO₂e, undertakes a modification that will result in an emission increase and net emission increase of at least 75,000 tpy on a CO₂e basis and 0 tpy on a mass basis.

None of the commodities stored in this tank contain significant amounts of carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, or sulfur hexafluoride. Therefore, the storage tank will not emit significant amounts of GHGs.

Regulation XX: Regional Clean Air Incentive Market (RECLAIM)

The subject storage tank is not subject to RECLAIM since it does not emit NO_x or SO_x.

Regulation XXX: Title V Permits

The initial Title V permit for the refinery was sent to Chevron on September 29, 2009 with an effective date of October 12, 2009. The permit issued for this tank will be issued as a revision of the Title V permit. Permit revisions are categorized into the following four types: *administrative, minor, de minimis significant and significant*. The review and distribution requirements for each revision type are summarized in the following table.

Title V Permit Revisions: Review and Distribution Requirements

Revision Type	Permit Review and Distribution Requirements		
	EPA Review (45-day)	Public Notice (30-day)	Send Final Permit to EPA
Administrative	No	No	Yes
Minor	Yes	No	Yes
De Minimis Significant	Yes	No	Yes
Significant	Yes	Yes	Yes

As defined in Rule 3000, a minor Title V permit revision is any revision that:

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- (1) does not require or change a case-by-case evaluation of: reasonably available control technology (RACT) pursuant to Title I of the federal Clean Air Act; or maximum achievable control technology (MACT) pursuant to 40 CFR Part 63, Subpart B;
- (2) does not violate a regulatory requirement;
- (3) does not require any significant change in monitoring terms or conditions in the permit;
- (4) does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit;
- (5) does not result in an emission increase of RECLAIM pollutants over the facility starting Allocation plus nontradeable Allocations, or higher Allocation amount which has previously undergone a significant permit revision process;
- (6) does not result in an increase in emissions of a pollutant subject to Regulation XIII - New Source Review or a hazardous air pollutant;
- (7) does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement;
- (8) is not an installation of a new permit unit subject to a New Source Performance Standard (NSPS) pursuant to 40 CFR Part 60, or a National Emission Standard for Hazardous Air Pollutants (NESHAP) pursuant to 40 CFR Part 61 or 40 CFR Part 63; and,
- (9) is not a modification or reconstruction of an existing permit unit, resulting in new or additional NSPS requirements pursuant to 40 CFR Part 60, or new or additional NESHAP requirements pursuant to 40 CFR Part 61 or 40 CFR Part 63; or,
- (10) incorporates an existing general permit, as defined in subdivision (e) of Rule 3004, and its associated requirements, into another Title V permit.

A de minimis significant Title V permit revision meets all of the requirements above with the exception that it does result in an increase in the emission of HAP, CO, VOC or PM10 that is not greater than the respective threshold below and the total cumulative emission increase of HAP, CO, VOC or PM10 for all de minimis Title V revisions during the term of the Title V permit is not greater than the respective threshold:

HAP: 30 lb/day
CO: 220 lb/day
VOC: 30 lb/day
PM10: 30 lb/day

Once the cumulative emission increase of HAP, CO, VOC or PM10 for all de minimis revisions issued during the term of the Title V permit exceeds the respective threshold above, all subsequent Title V permit revisions, with an increase of HAP, CO, VOC or PM10, issued during the term of the Title V permit will be significant revisions. Therefore, the cumulative increase in HAP, CO, VOC and PM10 emissions for de minimis revisions must be tracked for each 5-year Title V permit term. The term of the current Title V permit is from October 12, 2009 until October 11, 2014.

The proposed revision meets all of the minor TV revision specifications listed above except that the modifications cause an increase in estimated VOC emissions of 0.9 lb/day. Therefore, it qualifies as a de minimis significant revision. The table below contains a summary of the HAP, CO, VOC and PM10 emission increases for all de minimis significant revisions issued (or soon to be issued) during the term of the current Chevron El Segundo Refinery Title V Permit.

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Since the cumulative emission increase of HAP, CO, VOC and PM10 for all de minimis significant revisions issued during the current term of the Chevron Title V permit is less than respective threshold, this revision of the Title V permit is a de minimis significant revision.

Emission Increases for De Minimis Significant Revisions of Chevron Title V Permit

Title V Revision Appl. No.	Title V Revision No.	Revision Date	Emission Increase (lb/day)			
			HAP	CO	VOC	PM10
511206	Revision No. 45 of Section D	9/15/10	0	0	1.0	0
516647	Revision No. 48 of Section D & Revision No. 103 of Section H	3/31/11	0	0	1.4	0
526610	Revision 105 of Section H	5/10/12	0	0	0.3	0
533787	Revision No. 54 of Section D	8/14/12	0	0	1.0	0
539644	To Be Determined	TBD	0	0	1.8	0
542540	Revision No. 56 of Section D	11/20/12	0	0	4.3	0
543097	To Be Determined	TBD	0	0	0.9	0
Cumulative (1)			0	0	10.7	0

(1) Cumulative emission increase for all de minimis significant Title V permit revisions since issuance of the initial Title V permit on October 12, 2009.

Chevron has submitted Title V permit revision A/N 543097 for processing of this de minimis significant Title V permit revision, which will be distributed for a 45-day EPA review.

RECOMMENDATION:

Based on the foregoing evaluation, it is expected that the subject storage tank will comply with all applicable District Rules and Regulations. It is recommended that a Permit to Operate, Section D of the RECLAIM/Title V facility permit, be issued for Storage Tank No. 290.