

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 1
	APPL. NO. 472717	DATE 3/28/2013
	PROCESSED BY Jon Uhl	CHECKED BY

PERMIT TO OPERATE (revised)

COMPANY NAME, MAILING ADDRESS

BP West Coast Products LLC/ARCO Vinvale Terminal
 8601 S. Garfield Avenue
 South Gate, CA 90280

SCAQMD ID # 800396

EQUIPMENT LOCATION

8601 S. Garfield Avenue, South Gate, CA 90280

1. APPLICATION NUMBER 472717

EQUIPMENT DESCRIPTION

STORAGE TANK NO. 942, DOMED EXTERNAL FLOATING ROOF, DOUBLE DECK TYPE, 144'-0" DIA. X 46'-0" H., 5,605,000 GALLONS CAPACITY, RIVETED SHELL, WITH A MECHANICAL SHOE PRIMARY SEAL AND A RIM-MOUNTED WIPER-TYPE SECONDARY SEAL.

CONDITIONS See Sample Permit

BACKGROUND & PROCESS DESCRIPTION

This is an existing Title V, non-RECLAIM bulk terminal facility in the city of South Gate. The property was originally developed as a petroleum refinery, and converted to a petroleum products distribution terminal in the 1970's. The terminal handles gasoline, diesel, ethanol, transmix, and wastewater (generated onsite). Tank 942 was originally constructed in 1928 for crude oil storage, and converted to petroleum product storage in the 1970's. The mechanical shoe primary seal and wiper-type secondary seal were also added.

Table 1 - Permitting History

A/N	Date	Status	Permit	Permit Action
472717	5/1/2003	31	G24099	Add external geodesic dome for Rule 1178 compliance. Permit to Operate was issued with a 34,000,000 gal/month throughput limit and a maximum vapor pressure limit of 13.5 RVP. (Attachment #10)
n/a	2/23/2009	n/a	n/a	Initial Title V permit issued. Permit to Operate for Tank 942 listed in Section D; Permit to Construct for Tank 942 listed in Section H. No throughput or vapor pressure limits. (Attachment #5)
472717	5/6/2008	26	n/a	Add external geodesic dome for Rule 1178 compliance. Permit to Construct was issued without any throughput or vapor pressure limits. (Attachment #4)
395562	3/15/2002	31	F50270	Facility change of ownership from Atlantic Richfield Company (ID 800015) to BP West Coast Products LLC (ID 800396). (Attachment #3)
126888	5/16/1986	31	M52008	Replacement of the primary and secondary seals for Rule 463 compliance. This application was subject to New Source Review (NSR) under the revised Reg. XIII (on or after 1-1-1983). The NSR calculation was based on 6000 bbl/day @ 11 psia TVP. There is no throughput or vapor pressure limit on the permit. (Attachment #2)

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 2
	APPL. NO. 472717	DATE 3/28/2013
	PROCESSED BY Jon Uhl	CHECKED BY

A/N	Date	Status	Permit	Permit Action
C-26519	3/12/1981	31	M16765	This is the earliest permit to Operate for Tank 942 that has been found. Lists a shoe type primary seal and a secondary seal. The tank is limited to storing organic liquid with a vapor pressure less than 11 psia under actual storage conditions. There is no throughput limit. (Attachment #1)
N/A	1928	n/a	n/a	Tank 942 was originally constructed in 1928.

This application (A/N 472717) was received on August 10, 2007 (deemed complete October 12, 2007) to modify external floating roof storage tank number 942 by adding an external geodesic dome for Rule 1178 compliance. This tank is currently used to store gasoline with a maximum Reid vapor pressure of 13.5. The Permit to Construct was issued on May 6, 2008. The tank dome has been installed. The applicant has submitted the required dome drawings. The last Rule 463/1178 compliance report (dated 6/5/2012, see Attachment #6) shows that Tank 942 is operating in compliance with District rules. A Permit to Operate (G24098) was issued on May 1, 2013, as part of Title V permit revision #4. The PTO added both throughput (34,000,000 gal/month) and vapor pressure (RVP 13.5) limits in the permit conditions, based on information submitted on Form 400-E-18 (see Attachment #9).

BP West Coast Products, LLC/ARCO Vinvale Terminal filed an objection to the throughput limit on Tank 942, and subsequently agreed to a total combined throughput limit for all product storage tanks at this facility (Tank Numbers 930, 931, 932, 933, 934, 940, 941, 942, 943, 950 and 951) of 181,145,741 gallons in any one calendar month. This total combined tank throughput limit is equal to the truck loading throughput limit at this facility (5,843,411 gallons per day for all products times 31 days per month = 181,145,741 gallons per month). Only tank 951 previously had a throughput limit; all other tanks had no throughput limit. The proposed changes will result in no VOC emission increase compared to the pre-modification VOC emissions.

FEE EVALUATION

No additional fees are due for the Permit to Operate.

EMISSIONS CALCULATIONS

This tank was first subject to New Source Review (NSR) in 1984 when the permit to construct was issued for the replacement of the primary and secondary seals required for Rule 463 compliance (see Attachment #7: NSR datasheet, application processing and calculations, tank calculation sheet). The Potential-to-Emit (PTE) calculation was based on the maximum allowable true vapor pressure under Rule 463 (11 psia at 70°F) and a throughput of 6000 bbl/day (= 91,980,000 gal/year). Based on the VOC emissions calculation method used in 1984, the PTE was 11.63 lb/day VOC.

The original application proposed to add an external dome and increase the throughput to 400,000,000 gal/year (see Form 400-E-18) with a maximum 13.5 Reid Vapor Pressure (RVP 13.5). RVP 13.5 gasoline is the maximum vapor pressure based on the standard CARB formulation requirements.

Later the applicant proposed a total combined throughput limit for all product storage tanks at this facility (Tank Numbers 930, 931, 932, 933, 934, 940, 941, 942, 943, 950 and 951) of 181,145,741 gallons in any one calendar month. This total combined tank throughput limit is equal to the truck loading throughput limit at this facility (5,843,411 gallons per day for all products times 31 days per month = 181,145,741 gallons per month). The worst case for emissions assumes that all 181,145,741 gallons per month go through Tank 942.

Storage tank emissions are estimated using the EPA Tanks 4.09d program. The pre-modification emission calculations for Tank 942 (6000 bbl/day, 11 psia TVP, no dome) are updated using the Tanks 4.09d program and compared to the emissions from the proposed changes to maximum vapor pressure and worst case throughput (181,145,741 gal/month, 13.5 RVP, with dome).

Table 2 lists the pre-modification and post-modification storage tank specifications taken from the tank description submitted with this application; the only change is the addition of the external dome and the proposed changes to maximum vapor pressure and worst case throughput limits (181,145,741 gal/month = 2,173,748,892 gallons/year).

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 3
	APPL. NO. 472717	DATE 3/28/2013
	PROCESSED BY Jon Uhl	CHECKED BY

Table 2 – Storage Tank # 942 Specifications

	External Floating Roof Tank Pre-Modification A/N 126888 (M52008)	Domed External Floating Roof Tank Post-Modification A/N 472717
Tank Dimensions		
Diameter, feet	144.	144.
Volume, gallons (barrels)	5,605,000	5,605,000
Throughput, gallons per year	91,980,000	2,173,748,892
Turnovers	16.59	387.82
Paint Characteristics		
Internal Shell Condition	Light Rust	Light Rust
Shell Color/Shade	White/White	White/White
Shell Condition	Good	Good
Tank Construction and Rim-Seal System		
Construction:	Riveted	Riveted
Primary Seal:	Mechanical Shoe	Mechanical Shoe
Secondary Seal:	Rim-mounted	Rim-mounted
Liquid Contents		
Mixture/Component	Gasoline, max true vapor pressure: 11 psia @ 70 F	Gasoline, max Reid vapor pressure: 13.5
Roof Characteristics		
Type	Double Deck	Double Deck with External Domed Roof
Deck Fittings/Status	<ul style="list-style-type: none"> • 2-Access Hatch (24-in Dia.)/Bolted Cover, Gasketed • 3-Gauge-Hatch/Sample Well (8-in Dia.)/Weighted Mech. Actuation, Gasketed • 38-Roof Leg (3-in Dia.)/Adjustable, Double-Deck Roofs • 3-Roof Drain (3-in Dia.)/90% Closed • 1-Slotted Guidepole/Sample Well/Gasketed Sliding Cover with Float, Sleeve, Wiper • 1-Vacuum Breaker (10 in Dia.)/ Weighted Mech. Actuation, Gasketed • 1-Rim Vent (6 in Dia.)/ Weighted Mech. Actuation, Gasketed • 2-Automatic Gauge Float Well/Bolted Cover, Gasketed 	<ul style="list-style-type: none"> • 2-Access Hatch (24-in Dia.)/Bolted Cover, Gasketed • 3-Gauge-Hatch/Sample Well (8-in Dia.)/Weighted Mech. Actuation, Gasketed • 38-Roof Leg (3-in Dia.)/Adjustable, Double-Deck Roofs • 3-Roof Drain (3-in Dia.)/90% Closed • 1- Slotted Guidepole/Sample Well/Gasketed Sliding Cover with Float, Sleeve, Wiper • 1-Vacuum Breaker (10 in Dia.)/ Weighted Mech. Actuation, Gasketed • 1-Rim Vent (6 in Dia.)/ Weighted Mech. Actuation, Gasketed • 2-Automatic Gauge Float Well/Bolted Cover, Gasketed

The Tanks 4.09d ROG calculations are summarized in Table 3 (full calculations in attachment #8).

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 4
	APPL. NO. 472717	DATE 3/28/2013
	PROCESSED BY Jon Uhl	CHECKED BY

Table 3 – Summary of Emissions Decreases

Storage Tank No.	Pre-Modification Emissions		Post Modification Emissions		Emissions Decrease	
	lb/yr	lb/day	lb/yr	lb/day	lb/yr	lb/day
942	21,070.99	57.73	5,171.44	15.73	15,899.55	42.00

NSR : BACT & OFFSETS

BACT: There is an increase in VOC emissions greater than 1 lb/day (30 lb/month), from the proposed change in vapor pressure limit and throughput limit. Therefore, BACT is required for this tank modification. BACT is Category A seals and an external dome. This external floating roof tank has Category A seals and an external geodesic dome.

OFFSETS: With the addition of the external geodesic dome, the VOC emissions decrease. No offsets are required.

RULE 1313(g) – Permits To Operate, Emission Limitation Permit Conditions: This rule requires that every permit shall have (1) Identified BACT conditions; and (2) Monthly maximum emissions from the permitted source. For storage tanks the current District interpretation of this rule requires permit conditions limiting the monthly throughput and maximum vapor pressure. For Tank 942, a facility-wide total combined tank throughput limit of 181,145,741 gallons in any one calendar month and a maximum limit of 13.5 Reid vapor pressure have been added.

REVIEW OF COMPLIANCE DATABASE:

On 5/23/2013, the AQMD Compliance Database shows no outstanding Notice of Violation or Notice to Comply for this storage tank.

RULES EVALUATION:

PART 1 SCAQMD REGULATIONS

Rule 212	Standards for Approving Permits	November 14, 1997
	This permit to operate meets all the criteria in Rule 212 for permit approval. Rule 212 public notice is not required.	
212(a)	The equipment is designed to operate without emitting air contaminants in violation of Division 26 of the State Health and Safety Code or in violation of AQMD's rules and regulations.	
212(b)	The external dome was constructed in accordance with the Permit to Construct.	
212(c)(1)	This tank is not within 1000 feet from the outer boundary of a school.	
212(c)(2)	There is no emission increase exceeding any of the daily maximums specified in subdivision (g).	
212(c)(3)	There is no increase in emissions of toxic air contaminants.	

Rule 401	Visible Emissions	November 9, 2001
	Visible emissions are not expected under normal operation.	
Rule 402	Nuisance	May 7, 1976
	Nuisance complaints are not expected under normal operating conditions.	

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 5
	APPL. NO. 472717	DATE 3/28/2013
	PROCESSED BY Jon Uhl	CHECKED BY

Rule 463	Organic Liquid Storage	May 6, 2005
463(a)	This rule applies to this domed floating roof storage tank. The tank capacity is more than 19,815 gallons; the true vapor pressure is 1.5 psia or greater under actual storage conditions.	
463(c)&(d)	The tank is equipped with the required type of cover and appropriate seals. This tank is currently in compliance with Rule 463 and is expected to continue to comply with Rule 463 requirements given proper recordkeeping and inspections.	

Rule 467	Pressure Relief Valves	March 5, 1982
467(g)(2)	<u>Exemptions:</u> Pressure-vacuum vent valves on storage tanks are exempt.	

Rule 1149	Storage Tank and Pipeline Cleaning and Degassing	May 2, 2008
1149(c)(1)	This rule applies to this domed floating roof storage tank. The tank capacity is more than 100,000 gallons; the Reid vapor pressure is 0.5 psia or greater. Per Table 1, Rule 1149 applies to this tank, and the tank will continue to be subject to the requirements of Rule 1149 for tank cleaning and degassing activities.	

Rule 1173	Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants	February 6, 2009
1173(b)	<u>Applicability:</u> A Consent Decree requires the BP/ARCO Vinvale Terminal to comply with Rule 1173. Pressure-vacuum valves on storage tanks are exempt per Rule 1173(l)(1)(A)(H). Fugitive components associated with this tank will continue to be part of the facility Rule 1173 monitoring program. Compliance is expected.	

Rule 1178	Further Reduction of VOC Emissions from Storage Tanks at Petroleum Facilities	April 7, 2006
1178(b)	Applicability. This rule applies to all aboveground storage tanks with capacity greater than 19,815 gallons, and used to store organic liquids with true vapor pressure greater than 0.1 psi, and located at any petroleum facility emitting more than 20 tons per year of VOC in any emission inventory year starting with emission inventory year 2000. BP/ARCO Vinvale Terminal is a petroleum facility which had VOC emissions exceeding 20 tons in their Annual Emissions Report (AER) for the emission inventory year 2000. This tank stores organic liquids with a TVP greater than 0.1 psia and is therefore subject to Rule 1178.	
1178(d)(1)	<p>External Floating Roof Tanks.</p> <p>For tanks containing organic liquids, each tank shall be equipped with the fittings specified in this paragraph.</p> <p>This tank stores organic liquids with a TVP which may exceed 3 psia. The tank is subject to the fittings requirements of Rule 1178(d)(1) for a domed external floating roof tank.</p>	
1178(d)(2)	Domed External Floating Roof Tanks. For this Phase II tank at a facility choosing to comply with Rule 1178(d)(2)(A)(iv), containing organic liquids greater than 3 psia, the dome roof is required to be installed by 12/31/2010.	

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 6
	APPL. NO. 472717	DATE 3/28/2013
	PROCESSED BY Jon Uhl	CHECKED BY

Rule 1178	Further Reduction of VOC Emissions from Storage Tanks at Petroleum Facilities	April 7, 2006
Rule 1178(j)(7) provides an exemption from the doming requirements of paragraph (d)(2)(A) and (d)(2)(B) if the tank is permitted to contain more than 97% by volume crude oil and complies with all the remaining <u>applicable</u> requirements of this rule.		

Specifications:	Tank #942
Contains more than 97%vol crude oil?	No
Maximum vapor pressure: psia	11.0

1178(d)(2)(D)	The external floating roof tank has been equipped with all roof openings in accordance with the specifications listed in subparagraph (d)(1)(A):
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(i) Equip each access hatch and gauge float well with a cover that is gasketed and bolted. The cover shall be closed at all times, with no visible gaps, except when the hatch or well must be opened for access.	Yes
(ii) Equip each gauge hatch/sample well with a cover that is gasketed. The cover shall be closed at all times, with no visible gaps, except when the hatch or well must be opened for access.	Yes
(iii) Gasket or cover each adjustable roof leg with a VOC impervious sock at all times when the roof is floating.	Yes
(iv) Gasket each rim vent. Rim vents shall be closed at all times, with no visible gaps, when the roof is floating; and shall be set to open only when the roof is being floated off the roof leg supports or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting	Yes
(v) Gasket each vacuum breaker. Vacuum breakers shall be closed at all times, with no visible gaps, when the roof is floating; and shall be set to open only when the roof is being floated off or is being landed on the roof leg supports.	Yes

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 7
	APPL. NO. 472717	DATE 3/28/2013
	PROCESSED BY Jon Uhl	CHECKED BY

Rule 1178	Further Reduction of VOC Emissions from Storage Tanks at Petroleum Facilities	April 7, 2006
Specifications:	Tank #942	
(vi) Equip each open floating roof drain with a slotted membrane fabric cover or other device with an equivalent control efficiency that covers at least 90 percent of the area of the opening.	Yes	
(vii) Equip each unslotted guidepole well with a gasketed sliding cover and a flexible fabric sleeve or wiper	N/A	
(viii) Equip each unslotted guidepole with a gasketed cover at the end of the pole. The cover shall be closed at all times, with no visible gaps, except when gauging or sampling.	N/A	
(ix) Equip each slotted guidepole with a gasketed cover, a pole wiper and a pole sleeve. The pole sleeve shall be extended into the stored liquid	Yes	
(x) Equip each slotted guidepole having a pole float with a gasketed cover, a pole wiper, and a pole float wiper. The wiper or seal of the pole float shall be at or above the height of the pole wiper.	Yes	
(xi) Cover each slotted guidepole opening with a gasketed cover at all times, with no visible gaps, except when the cover must be opened for access.	Yes	
(xii) Maintain the pole float in a condition such that it floats within the guidepole at all times except when it must be removed for sampling or when the tank is empty.	Yes	
(xiii) Except for vacuum breakers and rim vents, ensure that each opening in the external floating roof shall provide a projection below the liquid surface.	Yes	

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 8
	APPL. NO. 472717	DATE 3/28/2013
	PROCESSED BY Jon Uhl	CHECKED BY

Rule 1178	Further Reduction of VOC Emissions from Storage Tanks at Petroleum Facilities	April 7, 2006
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Specifications:	Tank #942	
(xiv) Except for vacuum breakers, rim vents, roof drains, and leg sleeves, equip all other openings in the roof with a gasketed cover or seal which is closed at all times, with no visible gaps, except when the cover or seal must be opened for access.	Yes	
1178(d)(2)(E)	The external floating roof tank has been equipped with seals in accordance with the specifications listed in subparagraph (d)(1)(B):	
Specifications:	Tank #942	
(i) The primary seal shall be a mechanical shoe or liquid mounted.	Yes mechanical shoe	
(ii) The secondary seal shall be rim mounted and shall not be attached to the primary seal.	Yes	
1178(d)(2)(F)	The concentration of organic vapor in the vapor space above the external floating roof shall not exceed 30% LEL. The Rule 463/1178 Compliance Report dated 6/5/2012 records 0% LEL measurement.	
	Compliance with Rule 1178 is expected.	

REG XIII	New Source Review	December 6, 2002
		Application Deem Complete Date: 10/12/2007

	<u>Emissions Summary for Storage Tank 942 – Criteria Pollutants</u>				
	Pollutant	R1 (lb/hr)	R1 (lb/day)	R2 (lb/hr)	R2 (lb/day)
	ROG	0.66	15.73	0.66	15.73
1303(a)	There is an increase in VOC emissions greater than 1 lb/day (30 lb/month) from the proposed increase in throughput from 6000 bbl/day to a worst case throughput of 181,145,741 gal/month, and change in the maximum vapor pressure from 11 psia @ 70 F true vapor pressure to 13.5 Reid vapor pressure. Therefore, BACT is required for this tank modification. BACT is Category A seals and an external dome. This external floating roof tank has Category A seals and an external geodesic dome has been added. With the addition of the external dome, there is a net emission decrease. The external geodesic dome is also required by Rule 1178.				
1303(b)(1)	Modeling: Modeling for VOC is not required (Rule 1303, Appendix A); no further modeling analysis is required.				
1303(b)(2)	Offsets: No emission increase; therefore, no offsets are required.				

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 9
	APPL. NO. 472717	DATE 3/28/2013
	PROCESSED BY Jon Uhl	CHECKED BY

REG XIII	New Source Review	December 6, 2002
		Application Deem Complete Date: 10/12/2007
1303(b)(3)	Sensitive Zone Requirements. ERC's are not required.	
1303(b)(4)	Facility Compliance. This facility complies with all applicable District rules and regulations.	
1303(b)(5)	Major Polluting Facilities. This is not a new major polluting facility. This is not a major modification at an existing major polluting facility since there is no emission increase. Therefore, the provisions of this paragraph do not apply to this equipment.	
1313(g)	<p>This rule requires that every permit to operate shall have:</p> <p>(1) Identified BACT conditions; and</p> <p>(2) Monthly maximum emissions from the permitted source.</p> <p>For storage tanks, the current District interpretation of this rule requires permit conditions limiting the monthly throughput and maximum vapor pressure. For Tank 942, a facility-wide total combined tank throughput limit of 181,145,741 gallons in any one calendar month and a maximum limit of 13.5 Reid vapor pressure have been added.</p>	

Rule 1401	New Source Review of Toxic Air Contaminants	March 4, 2005
		Application Deemed Complete: 10/12/2007
1401(g)(B)	The VOC emissions and associated air toxics are decreased by the addition of the external dome. There is no increase in the cancer burden, MICR or acute or chronic HI at any receptor location.	
	Federal NSR for toxics does not apply since this is not considered a reconstruction per 40CFR63, Subpart A, §63.2.	

Rule 1401.1	Requirements for New and Relocated Facilities Near Schools	November 4, 2005
1401.1(b)	This is an existing facility.	

REG XX	RECLAIM	May 6, 2005
	This is not a RECLAIM facility.	

REG XXX	Title V	November 5, 2010
	The BP/ARCO Vinvale Terminal was issued a Title V permit effective on February 23, 2009. This is a minor permit revision as defined in Rule 3000(b)(15).	
	Rule 3000 (b)(15)(A)(i)	This revision 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.
	(b)(15)(A)(ii)	This revision does not violate a regulatory requirement.



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING & COMPLIANCE DIVISION
APPLICATION PROCESSING AND CALCULATIONS

PAGES 12	PAGE 10
APPL. NO. 472717	DATE 3/28/2013
PROCESSED BY Jon Uhl	CHECKED BY

(b)(15)(A)(iii)	This revision does not require any significant change in monitoring terms or conditions in the permit.
(b)(15)(A)(iv)	This revision does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit.
(b)(15)(A)(v)	This revision does not result in an emission increase of RECLAIM pollutants.
(b)(15)(A)(vi)	This revision does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review or a hazardous air pollutant.
(b)(15)(A)(vii)	This revision does not result in an increase in GHG emissions of >75,000 tpy CO ₂ e.
(b)(15)(A)(viii)	This revision does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement.
(b)(15)(A)(ix)	This revision 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.
(b)(15)(A)(x)	This revision 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.

A minor permit revision is subject to a **45-day EPA review**, Rule 3003(j) and not subject to public participation requirements, Rule 3006(b).

PART 2 STATE REGULATIONS

California Environmental Quality Act (CEQA)

These modifications are not a significant project. The dome roof's visual impact for reflection into "airspace" needs to be determined by the FAA if a facility falls within 5 miles of an airport. The BP/ARCO Vinvale Terminal is more than 5 miles from Los Angeles International Airport (LAX). Therefore, FAA approval was not needed for this project.

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 11
	APPL. NO. 472717	DATE 3/28/2013
	PROCESSED BY Jon Uhl	CHECKED BY

PART 3 FEDERAL REGULATIONS

40CFR Part 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978
40CFR Part 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984
40CFR Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commences after July 23, 1984
§60.110 §60.110a §60.110b	<p>Subparts K, Ka and Kb do not apply to this tank. The tank was constructed in 1928. The only changes to this tank during time period covered by these subparts have been the replacement of tank seals and the installation of an external dome. These changes do not meet the definition of a Reconstruction or Modification.</p> <p>Subpart Kb does not apply to this modification to install a dome on this tank. According to 40CFR Part 60 Subpart A – General Provisions; §60.2 Definitions, <i>modification</i> “means any physical change in, or change in the method of operation of, an existing facility which <u>increases</u> the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.” Since this modification will not result in an emission increase of VOC (the air pollutant to which a standard applies) or result in an emission of any pollutant not previously emitted, this rule does not apply to this tank.</p> <p>According to 40CFR Part 60 Subpart A – General Provisions; §60.15 Reconstruction, <i>reconstruction</i> means the replacement of components of an existing facility to such an extent that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility. Replacement of tanks seals and the installation of an external dome cost less than 50 percent of the cost of a new tank.</p>

40CFR Part 60 Subpart XX	Standards of Performance for Bulk Gasoline Terminals
§60.500	Applicability – This subpart applies to the loading racks only. There are no requirements for storage tanks.

40CFR Part 61 Subpart FF	National Emission Standard for Benzene Waste Operations
§61.340	<p><u>Applicability</u></p> <p>(a) This facility is not a chemical manufacturing plant, coke by-product recovery plant or petroleum refinery as defined in §61.341.</p> <p>(b) This facility does not treat, store or dispose of hazardous waste generated by any facility listed in paragraph (a).</p> <p>This tank is not subject to the requirements of 40CFR Part 61 Subpart FF.</p>

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 12
	APPL. NO. 472717	DATE 3/28/2013
	PROCESSED BY Jon Uhl	CHECKED BY

40CFR Part 63 Subpart CC	National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries
§63.340	Applicability – This storage tank is not located at a petroleum refinery site; therefore, this tank is not subject to the requirements of 40CFR Part 63 Subpart CC.

40CFR Part 63 Subpart R	National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)
§63.420	Applicability – The BP/ARCO Vinvale Terminal is a major source of Hazardous Air Pollutants (HAP)s, and is therefore subject to this subpart.
§63.423	Standards for Storage Vessels – Each external floating roof tank with a design capacity greater than or equal to 75 m ³ storing gasoline shall meet the requirements of §60.112b(a)(2)(i) and §60.112b(a)(2)(iii) of 40 CFR Part 60 Subpart Kb. An external floating roof tank meeting the requirements of SCAQMD Rule 1178 will comply with these requirements. Tank 942 complies with these requirements.

CONCLUSION

Based on the above evaluation, it is recommended that the following be issued:

A/N	Recommendation
472717	Reissue a revised Permit to Operate (PO) with conditions listed in the Sample Permit

List of Attachments

1. Permit to Operate M16765, A/N C-26519
2. Permit to Operate M52008, A/N 126888
3. Permit to Operate F50270, A/N 395562
4. Permit to Construct (command & control) A/N 472717
5. Permit to Construct A/N 472717 (initial Title V permit, Section H)
Permit to Operate F502270, A/N 395562 (initial Title V permit, Section D)
6. Rule 463/1178 compliance report (dated 6/5/2012)
7. NSR calculations from A/N 126888, PTO M52008 (issued 5/15/1986)
8. Tanks 4.0 calculations
9. Form 400-E-18, Storage Tank
10. Permit to Operate G24099, A/N 472717 (Title V permit, Section D, Revision #3, 5/1/2013)

END of Evaluation
