



MAR 12 2012

Jim Giles  
SFPP, L.P.  
1100 Town & Country Road  
Orange, CA 92868

**Re: Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)  
District Facility # C-1077  
Project # C-1120110**

Dear Mr. Giles:

Enclosed for your review is the District's analysis of your application for Authorities to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. SFPP proposes to add the capability to store and load diesel, biodiesel blends, and B100 biodiesel blendstock at the facility.

After addressing any EPA comments made during the 45-day comment period, the Authorities to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

David Warner  
Director of Permit Services

Enclosures  
cc: Stanley Tom, Permit Services

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

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MAR 12 2012

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

Re: **Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)**  
**District Facility # C-1077**  
**Project # C-1120110**

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for SFPP, L.P., located at 4149 Maple Drive, Fresno, CA, which has been issued a Title V permit. SFPP, L.P. is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. SFPP proposes to add the capability to store and load diesel, biodiesel blends, and B100 biodiesel blendstock at the facility.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authorities to Construct # C-1077-7-5, '18-6, '23-6, '26-10, '27-10, '28-10, '29-10, '38-10, '42-6, '51-3 with Certificate of Conformity. After demonstrating compliance with the Authorities to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures  
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**San Joaquin Valley Air Pollution Control District**  
**Authority to Construct Application Review**  
Above Ground Storage Tanks and Loading Racks

Facility Name: SFPP, L.P. Date: February 14, 2012  
Mailing Address: 1100 Town & Country Rd Engineer: Stanley Tom  
Orange, CA 92868 Lead Engineer: Joven Refuerzo  
Contact Person: Jim Giles  
Telephone: (707) 438-2102  
Application #(s): C-1077-7-5, '18-6, '23-6, '26-10, '27-10, '28-10, '29-10, '38-10, '42-6, '51-3  
Project #: C-1120110  
Deemed Complete: February 3, 2012

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**I. Proposal**

SFPP, L.P. (SFPP) has submitted an Authority to Construct (ATC) application to request changes to its tank and loading rack systems. SFPP will be adding the capability to store and load diesel, biodiesel blends, and B100 biodiesel blendstock to the facility. SFPP also proposes to install a recirculation system and to add an electric heater to tank C-1077-7 to allow the biodiesel blendstock to be pumped.

SFPP is proposing to install a new biodiesel blendstock offloading station serving tank FR-4 (permit C-1077-7). A 40 HP and two 4" bottom unloading arms will be installed at the facility. In addition, an accumulator, pump, and strainer system will be installed. Vapors from the accumulator will be vented back to the tanker truck. This will be a closed system.

Diesel and biodiesel blendstock have an initial boiling point of 302°F or greater. Per Rule 2020 Section 6.6.5, the unheated storage of organic material with an initial boiling point of 302°F or greater as measured by test method ASTM D-86 is permit exempt. Therefore, loading of diesel and biodiesel blendstock are not considered emission sources and are permit exempt. A letter will be sent to the facility stating the biodiesel blendstock offloading station is permit exempt.

SFPP has received their Title V Permit. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. SFPP must apply to administratively amend their Title V permit.

**II. Applicable Rules**

Rule 2020 Exemptions (8/18/11)  
Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)  
Rule 2520 Federally Mandated Operating Permits (6/21/01)  
Rule 4001 New Source Performance Standards (4/14/99)

Rule 4002 National Emissions Standards for Hazardous Air Pollutants (5/20/04)  
Rule 4101 Visible Emissions (2/17/05)  
Rule 4102 Nuisance (12/17/92)  
Rule 4621 Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (12/20/07)  
Rule 4623 Storage of Organic Liquids (4/19/05)  
Rule 4624 Organic Liquid Loading (12/20/07)  
CH&SC 41700 Health Risk Assessment  
CH&SC 42301.6 School Notice  
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)  
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

### **III. Project Location**

The facility is located at 4149 Maple Drive in Fresno, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

### **IV. Process Description**

SFPP is a bulk terminal that receives gasoline, diesel, and other types of fuels from refinery pipelines and distributes them to local gas stations.

SFPP will be adding B5 biodiesel fuel storage and truck loading capabilities to the Fresno Terminal. This will be accomplished by injection of B100 biodiesel blendstock into the incoming pipeline manifolds to create a B5 biodiesel blend. All existing Ultra Low Sulfur Diesel (ULSD) storage tanks will be converted to B5 biodiesel storage tanks. A new biodiesel blendstock offloading rack will be constructed. In addition, all diesel loading racks will be loading B5 biodiesel. B5 biodiesel fuel blend consists of 5% B100 biodiesel blendstock and 95% ULSD.

SFPP plans to convert existing storage tanks FR-4 (C-1077-7-3) into a biodiesel blendstock (B100) storage tank. SFPP would like to keep tank FR-4 as a gasoline storage tank. The B100 biodiesel blendstock will be delivered to the terminal by tanker trucks. Biodiesel blendstock will be offloaded at a new biodiesel blendstock offloading rack. Storage tanks FR-15, FR-16, FR-21, FR-22, and FR-23 will be converted to B5 biodiesel service. Tanks FR-16 and FR-21 are permitted gasoline storage tanks and are designed as multiproduct (organic liquid with vapor pressure less than 11 psia) storage tanks. Storage tanks FR-15, FR-22, and FR-23 are exempted diesel only storage tanks (Rule 2020, Section 6.6.5) and will be designated as diesel, biodiesel blends, and B100 biodiesel blendstock storage tank.

Since all diesel storage tanks are converting to B5 biodiesel service, all the loading racks will be loading B5 biodiesel in the future. SFPP is requesting B5 biodiesel to be added to the commodity list for loading racks listed in permits C-1077-26, '27, '28, '29, '38, '42, '51. A new biodiesel blendstock offloading rack will be constructed at the facility. The vapors generated from the unloading process will be vented back to the tanker truck. This will be a closed system.

The tank listed in permit C-1077-7 is currently in gasoline service. SFPP plans to convert FR-4 into a biodiesel blendstock storage tank. The tank will be insulated to maintain heat. A product recirculation system will be installed. The system will include a pump, strainer, and an electrically operated glycol/water heater with a shell and tube heat exchanger. The heat exchanger will transfer heat from the glycol/water solution to the biodiesel blendstock as the biodiesel blendstock is circulated through the unit. The tanks will be maintained at a constant temperature. SFPP is keeping this as a multiproduct tank for operational flexibility.

## **V. Equipment Listing**

### Pre-Project Equipment Description:

- C-1077-7-4: 1,260,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-4, INTERNAL FLOATING ROOF EQUIPPED WITH A LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM-MOUNTED SECONDARY SEAL MADE OF STEEL COMPRESSION PLATES AND A RUBBER WIPER BLADE TIP.
- C-1077-18-4: 1,470,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-16, INTERNAL FLOATING ROOF EQUIPPED WITH PDM'S DELTA PRIMARY SEAL AND WIPER TYPE SECONDARY SEAL.
- C-1077-23-4: 2,520,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-21, INTERNAL FLOATING ROOF EQUIPPED WITH URETHANE FABRIC "RESILIENT TOROIDAL SEAL" WITH WOVEN NYLON INSERT, AND "FOAM LOGS" INSERTED BETWEEN TANK SHELL AND PAN RIM.
- C-1077-26-9: 135.0 HP LOADING RACK #1 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3
- C-1077-27-9: 130.0 HP LOADING RACK #2 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3
- C-1077-28-9: 115.0 HP LOADING RACK #3 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3
- C-1077-29-9: 215.0 HP LOADING RACK #4 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3
- C-1077-38-9: 115.0 HP LOADING RACK #6 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3

C-1077-42-5: LOADING RACK #5 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO JOHN ZINK VAPOR BURNER.

C-1077-51-2: TWO LANE FUEL LOADING RACK #8 WITH EIGHT LOADING STATIONS PER LANE CONTROLLED BY THE VAPOR COMBUSTION SYSTEM LISTED UNDER PERMIT C-1077-3, AND PERMIT EXEMPT DIESEL DYE INJECTION AND FUEL ADDITIVE INJECTION

Proposed Modification:

C-1077-7-4: MODIFICATION OF 1,260,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-4, INTERNAL FLOATING ROOF EQUIPPED WITH A LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM-MOUNTED SECONDARY SEAL MADE OF STEEL COMPRESSION PLATES AND A RUBBER WIPER BLADE TIP: ALLOW STORAGE OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK AND INSTALL RECIRCULATION SYSTEM WITH ELECTRIC HEATER

C-1077-18-4: MODIFICATION OF 1,470,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-16, INTERNAL FLOATING ROOF EQUIPPED WITH PDM'S DELTA PRIMARY SEAL AND WIPER TYPE SECONDARY SEAL: ALLOW STORAGE OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

C-1077-23-4: MODIFICATION OF 2,520,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-21, INTERNAL FLOATING ROOF EQUIPPED WITH URETHANE FABRIC "RESILIENT TOROIDAL SEAL" WITH WOVEN NYLON INSERT, AND "FOAM LOGS" INSERTED BETWEEN TANK SHELL AND PAN RIM: ALLOW STORAGE OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

C-1077-26-9: MODIFICATION OF 135.0 HP LOADING RACK #1 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

C-1077-27-9: MODIFICATION OF MODIFICATION OF 130.0 HP LOADING RACK #2 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

C-1077-28-9: MODIFICATION OF 115.0 HP LOADING RACK #3 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

- C-1077-29-9: MODIFICATION OF 215.0 HP LOADING RACK #4 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK
- C-1077-38-9: MODIFICATION OF 115.0 HP LOADING RACK #6 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK
- C-1077-42-5: MODIFICATION OF LOADING RACK #5 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO JOHN ZINK VAPOR BURNER: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK
- C-1077-51-2: MODIFICATION OF TWO LANE FUEL LOADING RACK #8 WITH EIGHT LOADING STATIONS PER LANE CONTROLLED BY THE VAPOR COMBUSTION SYSTEM LISTED UNDER PERMIT C-1077-3, AND PERMIT EXEMPT DIESEL DYE INJECTION AND FUEL ADDITIVE INJECTION: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

Post Project Equipment Description:

- C-1077-7-4: 1,260,000 GALLON ABOVEGROUND CONE ROOF PETROLEUM DISTILLATES AND GASOLINE STORAGE TANK FR-4, INTERNAL FLOATING ROOF EQUIPPED WITH A LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM-MOUNTED SECONDARY SEAL MADE OF STEEL COMPRESSION PLATES AND A RUBBER WIPER BLADE TIP WITH A RECIRCULATION SYSTEM AND ELECTRIC HEATER FOR MAINTAINING TANK TEMPERATURE
- C-1077-18-4: 1,470,000 GALLON ABOVEGROUND CONE ROOF PETROLEUM DISTILLATES AND GASOLINE STORAGE TANK FR-16, INTERNAL FLOATING ROOF EQUIPPED WITH PDM'S DELTA PRIMARY SEAL AND WIPER TYPE SECONDARY SEAL
- C-1077-23-4: 2,520,000 GALLON ABOVEGROUND CONE ROOF PETROLEUM DISTILLATES AND GASOLINE STORAGE TANK FR-21, INTERNAL FLOATING ROOF EQUIPPED WITH URETHANE FABRIC "RESILIENT TOROIDAL SEAL" WITH WOVEN NYLON INSERT, AND "FOAM LOGS" INSERTED BETWEEN TANK SHELL AND PAN RIM
- C-1077-26-9: LOADING RACK #1 FOR PETROLEUM DISTILLATES AND GASOLINE, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3

- C-1077-27-9: LOADING RACK #2 FOR PETROLEUM DISTILLATES AND GASOLINE, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3
- C-1077-28-9: LOADING RACK #3 FOR PETROLEUM DISTILLATES AND GASOLINE, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3
- C-1077-29-9: LOADING RACK #4 FOR PETROLEUM DISTILLATES AND GASOLINE, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3
- C-1077-38-9: LOADING RACK #6 FOR PETROLEUM DISTILLATES AND GASOLINE, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3
- C-1077-42-5: LOADING RACK #5 FOR PETROLEUM DISTILLATES AND GASOLINE, WITH ORGANIC VAPORS EXHAUSTED TO JOHN ZINK VAPOR BURNER
- C-1077-51-2: TWO LANE FUEL LOADING RACK #8 FOR PETROLEUM DISTILLATES AND GASOLINE WITH EIGHT LOADING STATIONS PER LANE CONTROLLED BY THE VAPOR COMBUSTION SYSTEM LISTED UNDER PERMIT C-1077-3, AND PERMIT EXEMPT DIESEL DYE INJECTION AND FUEL ADDITIVE INJECTION

## **VI. Emission Control Technology Evaluation**

The internal floating roof tanks are designed to minimize VOC emissions by minimizing the headspace in the tank. This reduces the working volume of the tank as gasoline and other fuels are taken out of the tank, thereby reducing the amount of vapors emitted into the atmosphere.

All VOC emissions at this facility from loading rack operations are collected and controlled by a vapor collection system equipped with a 78.0 MMBtu/hr John Zink thermal oxidizer (enclosed ground flare) listed on permit C-1077-3.

## **VII. General Calculations**

This project does not meet the criteria for a Rule 2201 Modification, as defined in Section 3.26, and is not subject to the requirements of Rule 2201. Therefore, formal calculations for Rule 2201 are not necessary but will be shown for reference purposes.

## A. Assumptions

- Facility may operate 24 hours per day, 365 days per year (worst-case)

### Aboveground Storage Tanks (C-1077-7, '18, '23)

- VOC is the only criteria pollutant.
- The TVP shall be less than 11 psia.
- The total annual throughput for Unit C-1077-18 is 17,520,000 barrels.
- The total annual throughput for Unit C-1077-23 is 30,034,285 barrels.

### Loading Racks (C-1077-26, '27, '28, '29, '38, '42)

- Daily gasoline throughput is 5.25 million gallons per day
- Annual gasoline throughput is 1,916,250,000 gallons per year
- All vapors from the loading racks are collected and controlled by the John Zink flare listed under C-1077-3
- VOC emissions from the loading racks are taken into account under permit unit C-1077-3, therefore emissions from the racks themselves are considered zero for calculation purposes.

## B. Emission Factors

### Aboveground Storage Tanks (C-1077-7, '18, '23)

The PE for these tanks are based on EPA Tanks 4.0 modeling program.

## C. Calculations

The potential to emit calculations are based upon a worst case scenario of storing and loading gasoline fuel.

### **Potential to Emit (PE)**

Adding the capability of storing and loading diesel, biodiesel blends, and B100 biodiesel blendstock will not change the potential to emit for the units in this project. Therefore, the pre-project PE is equal to the post-project PE.

### C-1077-7

Per Project C-970918,

Daily PE = 13.5 lb-VOC/day

Annual PE = 4,922 lb-VOC/year

C-1077-18

Per Project C-1063094,

Daily PE = 16.6 lb-VOC/day  
Annual PE = 4,950 lb-VOC/year

C-1077-23

Per Project C-1063094,

Daily PE = 25.4 lb-VOC/day  
Annual PE = 7,486 lb-VOC/year

C-1077-26, '27, '28, '29, '38, '42

As explained above, emissions from the loading racks themselves are considered zero since the VOC emissions are accounted for in permit unit C-1077-3.

C-1077-51

Per Project C-1063698,

Daily PE = 0.3 lb-VOC/day  
Annual PE = 127 lb-VOC/year

**Rule 2020 Exemptions**

SFPP is proposing to install a new biodiesel blendstock offloading station serving tank FR-4 (permit C-1077-7). A 40 HP and two 4" bottom unloading arms will be installed at the facility. In addition, an accumulator, pump, and strainer system will be installed. Vapors from the accumulator will be vented back to the tanker truck. This will be a closed system.

Diesel and biodiesel blendstock have an initial boiling point of 302 °F or greater. Per Section 6.6.5, the unheated storage of organic material with an initial boiling point of 302 °F or greater as measured by test method ASTM D-86 is permit exempt. Therefore, loading of diesel and biodiesel blendstock are not considered emission sources and are permit exempt. A letter will be sent to the facility stating the biodiesel blendstock offloading station is permit exempt.

**Rule 2201 New and Modified Stationary Source Review Rule**

As noted in Section VII of this engineering evaluation, the proposed modification does not constitute an NSR modification; Pursuant to section 3.26 of District Rule 2201, a modification is defined as:

- 3.26.1.1 Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.

The proposed modification does not result in a change in the hour of operation, production rate or method of operation which necessitates a change in permit conditions.

- 3.26.1.2 Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.

The proposed modification does not constitute a structural change or addition to an existing emissions unit which necessitates a change in permit conditions.

- 3.26.1.3 An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.

The proposed modification does not result in an increase in emissions from any emissions unit.

- 3.26.1.4 Addition of any new emissions unit which is subject to District permitting requirements.

The proposed modification does not result in the addition of any new emissions units.

- 3.26.1.5 A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

The proposed modification does not necessitate any change to permit conditions or description.

As discussed above, adding the capability to store and load diesel, biodiesel blends, and B100 biodiesel blendstock to the facility does not meet any of the criteria for a modification. The storage and loading of diesel, biodiesel blends, and B100 biodiesel blendstock are not considered emission sources. However, a condition will be added to the permits to clarify the types of fuels allowed to be stored or loaded. Therefore, it is not subject to the requirements of District Rule 2201.

### **Rule 2520 Federally Mandated Operating Permits**

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment application.

#### **Rule 4001 New Source Performance Standards (NSPS)**

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60.

40 CFR Part 60, 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

40 CFR Part 60, Subpart A, section 14, defines the meaning of modification to which the standards are applicable. §60.14, paragraph (e)(5) states that the following will not be considered as a modification: *“the addition or use of any system or device whose primary function is the reduction of air pollutants, except when an emission control system is removed or replaced by a system which the Administrator determines to be less environmentally beneficial”*.

No newly constructed or reconstructed units are proposed in this project, nor is the unit being modified (as defined above). Since the permittee is adding the capability to store and load diesel, biodiesel blends, and B100 biodiesel blendstock to the tanks with no increase in

emissions, the requirements of these sections do not apply to this project. However, the requirements for this rule which are currently listed on the permits will be retained on the ATCs.

#### 40 CFR Part 60, Subpart XX - Standards of Performance for Bulk Gasoline Terminals

40 CFR Part 60 Subpart XX applies to this facility as indicated by 60.500 (a), (b), and (c) below:

##### Applicability

*a) The affected facility to which the provisions of this subpart apply is the total of all the loading racks at a bulk gasoline terminal which deliver liquid product into gasoline tank trucks.*

SFPP loads liquid gasoline into gasoline tank trucks with loading racks.

*(b) Each facility under paragraph (a) of this section, the construction or modification of which is commenced after December 17, 1980, is subject to the provisions of this subpart.*

This facility has had modifications performed after December 17, 1980.

*(c) For purposes of this subpart, any replacement of components of an existing facility, described in paragraph (a) of this section, commenced before August 18, 1983 in order to comply with any emission standard adopted by a State or political subdivision thereof will not be considered a reconstruction under the provisions of 40 CFR 60.15.*

SFPP installed the thermal oxidizer that controls emissions from these loading racks in 1992, which is after the 8/18/83 threshold date.

##### Standards for VOC Emissions

*(a) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.*

SFPP currently operates a vapor collection system controlled a John Zink ZTOF thermal oxidizer that collects vapors from the loading racks and tanks present at this facility.

*(b) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded, except as noted in paragraph (c) of this section.*

*(c) For each affected facility equipped with an existing vapor processing system, the emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 80 milligrams of total organic compounds per liter of gasoline loaded.*

The VOC permit limit of 0.02 lb/1000 gallons complies with this section's limit of 80 mg/L of gasoline. Compliance with this requirement is shown by the following:

0.02 lb = 9072 mg, and 1000 gallons = 3785 liters

9072 mg ÷ 3785 liters = 2.4 mg/L < 80 mg/L rule limit

*(d) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.*

The following condition certifies that the VCS complies with Subpart XX. This condition will be carried over to the proposed ATCs.

- The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520 and 40 CFR 60.503(d)]

*(g) The owner or operator shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.*

The following condition requires that the VCS be operated in such a manner as to minimize emissions from gasoline loading. This condition will be carried over to the proposed ATCs.

- The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624 and 40 CFR 60.502(g)]

*(h) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in §60.503(d).*

*(i) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).*

The following condition ensures compliance with these requirements. This condition will be carried over to the proposed ATCs.

- Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624 and 40 CFR 60.502(i)]

*(j) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.*

The following conditions ensures compliance with these requirements. These conditions will be carried over to the proposed ATCs.

- During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rule 2520 and 40 CFR 60.502(j)]
- All leaking components shall be repaired or replaced within 72 hours of discovery. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624 and 40 CFR 60.502(j)] Y

### Test Methods

40 CFR Part 60, Subpart XX, Section 60.503 (a) through (d) specifies test methods that must be used when determining compliance with the VOC limits of this Subpart.

The following condition references and ensures compliance with this entire Section. This condition will be carried over to the proposed ATCs.

- The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement

as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520 and 40 CFR 60.503(d)]

### Recordkeeping and Reporting

40 CFR Part 60, Subpart XX, Section 60.505 specifies recordkeeping requirements when performing source tests, leak checks, and for loadout operations.

The following condition ensures compliance with these requirements. This condition will be carried over to the proposed ATCs.

- The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520, 9.3 and 40 CFR 60.505(c)]

### **Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63.

The requirements of 40 CFR Part 63, Subpart HH—National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities are applicable to facilities that:

- process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer, or
- upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user
- and that is a Major HAP source (as defined in 40 CFR 63.2 – Definitions).

The facility HAP emissions are below Major HAP Source thresholds. Therefore, the requirements of this regulation do not apply.

### **Rule 4101 Visible Emissions**

Rule 4101 states that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. Based on experience with similar operations, compliance with visible emission limits is expected under normal operating conditions. The following condition on the facility wide permit to ensure compliance,

- No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

**Rule 4102 Nuisance**

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

**California Health & Safety Code 41700 (Health Risk Assessment)**

District Policy APR 1905 – Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (Appendix C), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

<b>HRA Summary</b>		
<b>Unit</b>	<b>Cancer Risk</b>	<b>T-BACT Required</b>
C-1077-7-5	0.00254 per million	No
C-1077-18-6	0.00494 per million	No
C-1077-23-6	0.0178 per million	No
C-1077-26-10	0.0000995 per million	No
C-1077-27-10	0.0000991 per million	No
C-1077-28-10	0.000107 per million	No
C-1077-29-10	0.000113 per million	No
C-1077-38-10	0.0000996 per million	No
C-1077-42-6	0.0000983 per million	No
C-1077-51-3	0.0000119 per million	No

**Discussion of T-BACT**

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than

1 and a cancer risk greater than 10 in a million). As outlined by the HRA Summary in Appendix C of this report, the emissions increases for this project was determined to be less than significant.

**Rule 4621 Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants**

Rule 4621 does not apply to this facility because SFPP does not meet the definition of a gasoline bulk plant as defined in this rule. SFPP loads more than the 20,000 gallon per day threshold as presented in Section 3.4 of this rule.

**Rule 4623 Storage of Organic Liquids**

Section 5.1.1 outlines control requirements based on the vapor pressure of the liquid stored.

Tank Capacity (Gallons)	True Vapor Pressure (TVP) of Organic Liquid		
	0.5 psia to <1.5 psia	1.5 psia to <11 psia	>11 psia
(Group A) 1,100 to 19,800	Pressure-vacuum relief valve, or internal floating roof, or external floating roof, or vapor recovery system	Pressure-vacuum relief valve, or internal floating roof, or external floating roof, or vapor recovery system	Pressure vessel or vapor recovery system
(Group B) >19,800 to 39,600	Pressure-vacuum relief valve, or internal floating roof, or external floating roof, or vapor recovery system	Internal floating roof, or external floating roof, or vapor recovery system	Pressure vessel or vapor recovery system
(Group C) >39,600	Internal floating roof, or external floating roof, or vapor recovery system	Internal floating roof, or external floating roof, or vapor recovery system	Pressure vessel or vapor recovery system

This tank utilizes a vapor recovery system, which is the most stringent control; therefore, compliance with this requirement is assured regardless of vapor pressure. Section 5.1.2 applies only to small producers and therefore is not applicable. Section 5.1.3 requires the tanks to be "leak-free" and seals and fitting to comply with the rule. Section 5.2 outlines requires the pressure-vacuum relief valve to be set within 10% of the maximum allowable working pressure of the tank, properly labeled with operating pressure settings, installed and maintained per manufacturer's instructions, and remain in leak free condition. The following conditions ensure compliance:

- {2517} All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623]

- {2501} A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]

Section 5.3.1 applies to external floating roof tanks and requires 1) a cover that rests on the surface of the liquid, 2) primary and secondary seals, 3) and the roof to be floating at all times except during initial and subsequent fills until the roof is lifted off the leg supports. This tank is an internal floating roof tank, therefore this requirement does not apply.

Section 5.3.2 provides specifications for welded external floating roof tanks with HMT seals. The proposed tank is an internal floating roof tank, therefore this section does not apply.

Section 5.4 provides specifications for internal floating roof tanks and requires 1) seals that meet all the requirements set forth in Section, 5.3 except for Section 5.3.2.1.3; 2) metallic-shoe type seals to be installed so that one end of the shoe extends into the stored liquid, and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface; and 3) compliance with the floating roof landing requirements in Section 5.3.1.3. The following conditions ensure compliance:

- {2506} Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623]
- {2507} The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623]
- {2508} The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623]
- {2509} No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623]
- {2510} No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623]
- {2511} The cumulative length of all gaps between the tank shell and the secondary seal, greater than 1/8 inch shall not exceed 5% of the tank circumference. [District Rule 4623]
- {2555} The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623]
- {2513} The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623]
- {2514} There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623]
- {2515} The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623]

- {2516} The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623]
- {2554} The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623]

Section 5.5 specifies requirements for floating roof deck fittings. Section 5.5.1 requires all openings in roofs used for sampling or gauging to provide a projection below the liquid surface, and all covers and seals must be closed at all times except when in use. The following conditions ensure compliance:

- {2517} All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be leak-free, except when the device or appurtenance is in use. [District Rule 4623]
- {2501} A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]

Section 5.5.2.1 outlines requirements for internal floating roof deck fittings. The following conditions ensure compliance:

- {2556} Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623]
- {2557} Each opening in the internal floating roof 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. [District Rule 4623]
- {2558} Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623]
- {2559} Rim 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. [District Rule 4623]

- {2560} Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623]
- {2561} 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. The fabric sleeve must be impermeable. [District Rule 4623]

Section 5.5.2.2 outlines requirements for external floating roof deck fittings. The proposed tank is an internal floating roof, therefore this requirement does not apply.

Section 5.6 outlines vapor recovery system requirements for fixed roof tanks. The tanks involved in this project are not fixed roof tanks; therefore, this section is not applicable.

Section 5.7 outlines the provisions for voluntary tank preventative inspection and maintenance, and tank interior cleaning program. The operator has not elected to participate in this program; therefore, no conditions are required to ensure compliance.

Section 6 outlines recordkeeping requirements and requires accurate record retention for a period of five years. Compliance is assured by the following condition and the remaining sections:

- {2490} All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

Section 6.1.1 requires the operator of external floating roof tanks to make the primary seal envelope available for unobstructed inspection by the APCO on an annual basis. A minimum of eight locations is required for riveted tanks with toroid-type seals, and a minimum of four locations is required for other cases. Since the tanks involved in this project are not external floating roof tanks, these requirements do not apply.

Section 6.1.2 requires the operator of floating roof tanks to submit a tank inspection plan to the APCO for approval. The following condition ensures compliance:

- Operators of floating roof tanks shall submit a tank inspection plan to the APCO for approval. The plan shall include an inventory of the tanks subject to this rule and a tank inspection schedule. A copy of the operator's tank safety procedures shall be made available to the APCO upon request. The tank inventory shall include tank's identification number, PTO number, maximum tank capacity, dimensions of tank (height and diameter), organic liquid stored, type of primary and secondary seal, type of floating roof (internal or external floating roof), construction date of tank, and location of tank. Any revision to a previously approved tank inspection schedule shall be submitted to the APCO for approval prior to conducting an inspection. [District Rule 4623]

Section 6.1.3 requires external floating roof tanks to be inspected at least once every 12 months, or every time a tank is emptied or degassed. The actual gap measurements must be recorded and submitted to the APCO as specified in Section 6.3.5. The proposed tank is an internal floating roof tank, therefore this section does not apply.

Section 6.1.4 requires internal floating roof tanks to be inspected at least once every 12 months after a tank is initially filled, or prior to refilling if the tank is newly constructed, repaired, or rebuilt. In addition, actual gap measurements of the primary seal and/or secondary seal must be conducted at least once every 60 months. The following conditions ensure compliance:

- {2563} The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623]
- {2564} The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623]

Section 6.2 outlines requirements for TVP and API gravity testing for uncontrolled fixed roof tanks. Section 6.3.1 does not apply to floating roof tanks and fixed roof tanks with vapor recovery systems. Section 6.3.2 only applies to emergency standby tanks. Section 6.3.3 only applies to temporary tanks. Section 6.3.4 only applies to small producers. Therefore, the requirements for these sections are not applicable.

Section 6.3.5 requires the inspection reports of floating roof tanks to be submitted to the APCO within five calendar days after the inspection for tanks that failed. For tanks that demonstrated compliance the inspection reports do not need to be submitted but must remain on-site and made available upon request by the APCO. In addition, this section also outlines the required information. The following conditions ensure compliance:

- {2532} Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623]

Section 6.3.6 requires submittal of TVP and API gravity records as required by Section 6.2; however, the tanks in this project are not subject to 6.2. Therefore, this section is not applicable.

Section 6.3.7 requires the operator to maintain the records of floating roof landing activities pursuant to Section 5.3.1.3 and 5.4.3. The following conditions ensure compliance:

- {2533} Permittee shall maintain the records of the external floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on

its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623]

- {2565} Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623]

Section 6.4 outlines approved test methods for analysis of halogenated exempt compounds, API gravity, TVP, control efficiency of VOC destruction device, and gas leak concentration. For the tanks involved in this project, the only applicable test method is for gas leak concentration, for which compliance is assured by the following condition:

- {2501} A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]

Section 7 requires that any tank installed or constructed on and after May 19, 2005 be in full compliance upon initial operation, and any previously exempt tank must be in full compliance upon the date the exemption status is lost. The tanks involved in this project are in full compliance, as discussed in the previous sections.

Therefore, continued compliance with the requirements of this rule is expected.

### **Rule 4624 Organic Liquid Loading**

The purpose of this rule is to limit VOC emissions from the transfer of organic liquids. This rule applies to organic liquid transfer facilities as defined in this rule.

The loading racks in this project are organic liquid loading racks, which is defined as "the portion from the connection at the inlet of an organic liquid pump to and including the hose and connector at the portable delivery tank.

This facility has the potential to be a Class 1 organic liquid transfer facility, meaning it is capable of transferring 20,000 gallons of organic liquid or more in any one day. Therefore, the requirements of Section 5.1 (Class 1) apply.

Section 5.1 For a Class 1 organic liquid transfer facility, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred and use one of the following systems:

- 5.1.1 An organic liquid loading operation shall be bottom loaded.
- 5.1.2 The VOC from the transfer operation shall be routed to:
  - 5.1.2.1 A vapor collection and control system;
  - 5.1.2.2 A fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids);
  - 5.1.2.3 A floating roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or
  - 5.1.2.4 A pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or
  - 5.1.2.5 A closed VOC emission control system.

The loading racks routed to a vapor collection and control system and are served by the combustion system listed on permit C-1077-3 which has a VOC emission limit that meets the limit of 0.08 pounds per 1,000 gallons of organic liquid transferred.

Section 5.2 applies to Class 2 organic liquid transfer facilities. The present facility is Class 1; therefore, Section 5.2 is not applicable.

Section 5.3 states "A transfer operation utilizing a closed VOC emission control system or utilizing a container that meets the control requirements of Rule 4623 (Storage of Organic Liquids) to meet the emission control requirements of this rule shall demonstrate compliance with Sections 5.1 and 5.2 by complying with the leak inspection requirements of Section 5.9." See Section 5.9 below for leak inspection requirements.

Section 5.4 requires the vapor collection and control system to operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum. This section shall not apply to the transfer of liquefied petroleum gas.

The following condition will be included on the permits to ensure compliance with Section 5.4:

- The vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum. [District Rule 4624]

Section 5.5 requires delivery tanks which previously contained organic liquids with a TVP of 1.5 psia or greater at the storage container's maximum organic liquid storage temperature to be filled only at transfer facilities satisfying Sections 5.1, 5.2, or 5.4, as applicable.

The vapors from the loading racks will be sent to the combustor system listed on permit C-1077-3 which meets the requirements of Section 5.1. The displaced vapors from the product accumulator, if any, will be vented back to the tanker truck.

Section 5.6 requires the transfer rack and vapor collection equipment to be designed, installed, maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections. The following condition will be listed on the permits to ensure compliance:

- Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624]

Section 5.7 prohibits the construction of any new top loading facility or the reconstruction, as defined in 40 CFR 60.15, or the expansion of any existing top loading facility with top loading equipment.

The loading rack in this project is not new, being reconstructed, or expanded. Therefore, this section does not apply to this project.

Section 5.8 pertains to the transfer of liquefied petroleum gas (LPG).

These loading racks do not involve the transfer of LPG; therefore, Section 5.8 is not applicable.

Section 5.9 outlines the leak inspection requirements.

- 5.9.1 The operator of an organic liquid transfer facility shall inspect the vapor collection system, the vapor disposal system, and each transfer rack handling organic liquids for leaks during transfer at least once every calendar quarter using the test method prescribed in Section 6.3.8.
- 5.9.2 A floating roof container that meets the applicable control requirements of Section 5.0 of Rule 4623 (Storage of Organic Liquids) shall be considered not leaking for the purposes of this section.
- 5.9.3. All equipment that are found leaking shall be repaired or replaced within 72 hours. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement.
- 5.9.4 An operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during the inspections required under provisions of Sections 5.9.1 and 5.9.2 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency would revert back to quarterly and the operator shall contact the APCO in writing within 14 days.

The following permit conditions ensure compliance with the requirements of this section.

- During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The

instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rules 2520 and 4624 and 40 CFR 60.502(j)]

- All leaking components shall be repaired or replaced within 72 hours of discovery. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624]

Section 6.1.3 requires an operator subject to any part of Section 5.0 to keep records of daily liquid throughput and the results of any required leak inspections.

The following conditions will ensure compliance with the daily liquid throughput records requirement and results of any required leak inspections.

- Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District Rules 2201 and 4624]
- Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 72 hours after detection. [District Rules 1070 and 4624]

Section 6.1.4 requires records to be retained for a minimum of five years and to be made readily available to the APCO, ARB, or EPA during normal business hours and submitted upon request to the APCO, ARB, or EPA.

The following condition will ensure compliance with the recordkeeping requirements of Section 6.1.4:

- All records shall be retained for a period of at least 5 years and shall be made available for APCO, ARB, or EPA inspection upon request. [District Rules 1070 and 4624]

Per Section 6.2.1, the operator of any Class 1 or Class 2 organic liquid transfer facility shall perform an initial source test of the VOC emission control system in accordance with the method prescribed in Section 6.3.2 to determine compliance with Section 5.1 and 5.2, as applicable.

These source testing requirements are also listed on permit C-1077-3. Compliance with this section is expected.

- VOC emissions from the vapor collection and control system shall be determined annually using 40 CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624]
- Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624]

### **California Health & Safety Code 42301.6 (School Notice)**

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

### **California Environmental Quality Act (CEQA)**

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District conducted a Risk Management Review and concludes that potential health impacts are less than significant.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

### **IX. Recommendation**

Compliance with all applicable rules and regulations is expected. Issue Authorities to Construct C-1077-7-5, '18-6, '23-6, '26-10, '27-10, '28-10, '29-10, '38-10, '42-6, '51-3 subject to the permit conditions on the attached draft Authorities to Construct in Appendix D.

**X. Billing Information**

<b>Annual Permit Fees</b>			
<b>Permit Number</b>	<b>Fee Schedule</b>	<b>Fee Description</b>	<b>Annual Fee</b>
C-1077-7-5	3020-05-G	1,260,000 gallons	\$382.00
C-1077-18-6	3020-05-G	1,470,000 gallons	\$382.00
C-1077-23-6	3020-05-G	2,520,000 gallons	\$382.00
C-1077-26-10	3020-01-D	135 HP	\$314.00
C-1077-27-10	3020-01-D	130 HP	\$314.00
C-1077-28-10	3020-01-D	115 HP	\$314.00
C-1077-29-10	3020-01-E	215 HP	\$412.00
C-1077-38-10	3020-01-D	115 HP	\$314.00
C-1077-42-6	3020-01-C	80 HP	\$197.00
C-1077-51-3	3020-01-D	199 HP	\$314.00

**Appendixes**

- A: Current PTOs
- B: Certificate of Conformity
- C: Health Risk Analysis Summary
- D: Draft ATCs

**APPENDIX A**  
**Current PTOs**

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-7-4

EXPIRATION DATE: 05/31/2016

## EQUIPMENT DESCRIPTION:

1,260,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-4, INTERNAL FLOATING ROOF EQUIPPED WITH A LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM-MOUNTED SECONDARY SEAL MADE OF STEEL COMPRESSION PLATES AND A RUBBER WIPER BLADE TIP.

## PERMIT UNIT REQUIREMENTS

---

1. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2, District Rule 4623, 6.1.3] Federally Enforceable Through Title V Permit
2. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
3. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623, 5.3.1.3] Federally Enforceable Through Title V Permit
4. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623, 5.3.2.1.1] Federally Enforceable Through Title V Permit
5. The cumulative length of all gaps, between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623, 5.3.2.1.1] Federally Enforceable Through Title V Permit
6. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623, 5.3.2.1.1] Federally Enforceable Through Title V Permit
7. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623, 5.3.2.1.2] Federally Enforceable Through Title V Permit
8. Cumulative length of all gaps between the tank shell and secondary seal greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference for all seal types. [District Rule 4623, 5.3.2.1.2] Federally Enforceable Through Title V Permit
9. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623, 5.3.2.1.3] Federally Enforceable Through Title V Permit
10. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623, 5.3.2.1.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623, 5.3.2.1.5] Federally Enforceable Through Title V Permit
12. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623, 5.3.2.1.6] Federally Enforceable Through Title V Permit
13. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623, 5.3.2.1.7] Federally Enforceable Through Title V Permit
14. All openings in the roof used for sampling and gauging, except pressure-vacuum valves comply with section 5.2, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be leak free, except when the device or appurtenance is in use for sampling or gauging. [District Rule 4623, 5.5.1] Federally Enforceable Through Title V Permit
15. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.11] Federally Enforceable Through Title V Permit
16. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.1.1] Federally Enforceable Through Title V Permit
17. Each opening in the internal floating roof 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. [District Rule 4623, 5.5.2.1.2] Federally Enforceable Through Title V Permit
18. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.1.3] Federally Enforceable Through Title V Permit
19. Rim 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. [District Rule 4623, 5.5.2.1.4] Federally Enforceable Through Title V Permit
20. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623, 5.5.2.1.5] Federally Enforceable Through Title V Permit
21. 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. The fabric sleeve must be impermeable. [District Rule 4623, 5.5.2.1.6] Federally Enforceable Through Title V Permit
22. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623, 6.1.4.1] Federally Enforceable Through Title V Permit
23. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623, 6.1.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623, 6.1.4.3] Federally Enforceable Through Title V Permit
25. Vapor pressure of stored liquids shall be determined as described in section 6.4 of District Rule 4623 (revised 5/19/05). [District Rule 4623, 6.2] Federally Enforceable Through Title V Permit
26. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all information necessary to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623, 6.3.5] Federally Enforceable Through Title V Permit
27. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3.1] Federally Enforceable Through Title V Permit
28. Records of monthly organic liquid throughput shall be maintained on the premises and shall be made available for District inspection upon request. [District Rule 4623, 6.3.7] Federally Enforceable Through Title V Permit
29. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3.7] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1077-18-4

**EXPIRATION DATE:** 05/31/2016

**EQUIPMENT DESCRIPTION:**

1,470,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-16, INTERNAL FLOATING ROOF EQUIPPED WITH PDM'S DELTA PRIMARY SEAL AND WIPER TYPE SECONDARY SEAL.

## PERMIT UNIT REQUIREMENTS

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1. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
2. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623, 5.1.1] Federally Enforceable Through Title V Permit
3. The total annual gasoline throughput for Tank FR-16 shall not exceed 17,520,000 barrels. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Daily VOC emissions shall not exceed 16.6 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623, 5.3.1.3] Federally Enforceable Through Title V Permit
6. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623, 5.3.2.1.1] Federally Enforceable Through Title V Permit
7. The cumulative length of all gaps, between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623, 5.3.2.1.1] Federally Enforceable Through Title V Permit
8. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623, 5.3.2.1.3] Federally Enforceable Through Title V Permit
9. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623, 5.3.2.1.2] Federally Enforceable Through Title V Permit
10. Cumulative length of all gaps between the tank shell and secondary seal greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference for all seal types. [District Rule 4623, 5.3.2.1.2] Federally Enforceable Through Title V Permit
11. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623, 5.3.2.1.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: SFPP, L.P.

Location: 4149 S MAPLE AVE, FRESNO, CA 93725

C-1077-18-4, Feb 14 2012 6 52AM -- TOMS

12. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623, 5.3.2.1.4] Federally Enforceable Through Title V Permit
13. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623, 5.3.2.1.5] Federally Enforceable Through Title V Permit
14. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623, 5.3.2.1.6] Federally Enforceable Through Title V Permit
15. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623, 5.3.2.1.7] Federally Enforceable Through Title V Permit
16. All openings in the roof used for sampling and gauging, except pressure-vacuum valves comply with section 5.2, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
17. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.11] Federally Enforceable Through Title V Permit
18. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.1.1] Federally Enforceable Through Title V Permit
19. Each opening in the internal floating roof 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. [District Rule 4623, 5.5.2.1.1] Federally Enforceable Through Title V Permit
20. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.1.3] Federally Enforceable Through Title V Permit
21. Rim 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. [District Rule 4623, 5.5.2.1.4] Federally Enforceable Through Title V Permit
22. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623, 5.5.2.1.5] Federally Enforceable Through Title V Permit
23. 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. The fabric sleeve must be impermeable. [District Rule 4623, 5.5.2.1.6] Federally Enforceable Through Title V Permit
24. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623, 6.1.4.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

25. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623, 6.1.4.2] Federally Enforceable Through Title V Permit
26. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623, 6.1.4.3] Federally Enforceable Through Title V Permit
27. Vapor pressure of stored liquids shall be determined as described in section 6.4 of District Rule 4623 (revised 5/19/05). [District Rule 4623, 6.2] Federally Enforceable Through Title V Permit
28. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623, 6.3.5] Federally Enforceable Through Title V Permit
29. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3.7] Federally Enforceable Through Title V Permit
30. Records of monthly organic liquid throughput shall be maintained on the premises and shall be made available for District inspection upon request. [District Rule 4623, 6.3.4] Federally Enforceable Through Title V Permit
31. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1077-23-4

**EXPIRATION DATE:** 05/31/2016

**EQUIPMENT DESCRIPTION:**

2,520,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-21, INTERNAL FLOATING ROOF EQUIPPED WITH URETHANE FABRIC "RESILIENT TOROIDAL SEAL" WITH WOVEN NYLON INSERT, AND "FOAM LOGS" INSERTED BETWEEN TANK SHELL AND PAN RIM.

## PERMIT UNIT REQUIREMENTS

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1. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623, 5.1.1] Federally Enforceable Through Title V Permit
2. No gap between the tank shell and the primary seal shall exceed one-half (1/2) inch. The cumulative length of all primary seal gaps greater than one-eighth (1/8) inch shall not exceed five (5) percent of the tank circumference. No continuous gap greater than one-eighth (1/8) inch shall exceed ten (10) percent of the tank circumference. [District Rule 4623, 5.3.2.3.2] Federally Enforceable Through Title V Permit
3. No gap between the tank shell and the secondary seal shall exceed one-half (1/2) inch. The cumulative length of all gaps between the tank shell and the secondary seal, greater than one-eighth (1/8) inch shall not exceed five (5) percent of the tank circumference. [District Rule 4623, 5.3.2.3.3] Federally Enforceable Through Title V Permit
4. No gap between the tank shell and the secondary seal shall exceed one-half (1/2) inch. [District Rule 4623, 5.3.2.3.3] Federally Enforceable Through Title V Permit
5. The secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal. [District Rule 4623, 5.3.2.3.6] Federally Enforceable Through Title V Permit
6. The secondary seal shall allow easy insertion of probes up to one-half (1/2) inch in width in order to measure gaps in the primary seal. [District Rule 4623, 5.3.2.3.5] Federally Enforceable Through Title V Permit
7. All openings in the roof used for sampling and gauging, except pressure-vacuum valves comply with section 5.2, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
8. A leak free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.17] Federally Enforceable Through Title V Permit
9. The permittee shall comply with all other applicable provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The permittee shall comply with all applicable provisions of 40 CFR 60 Subpart Kb. [40 CFR 60 Subpart Kb] Federally Enforceable Through Title V Permit
11. The permittee shall comply with recordkeeping requirements in section 6.3 of District Rule 4623 (amended 5/19/05) including recording type of liquid stored, storage temperature, and Reid vapor pressure. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [District Rule 4623, 5.3.1.3 and 40 CFR 60.112b(a)(1)(i)] Federally Enforceable Through Title V Permit
13. The internal floating roof tank 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. [District Rule 4623, 5.5.2.1 and 40 CFR 60.112b(a)(1)(ii)] Federally Enforceable Through Title V Permit
14. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.1.1, 40 CFR 60.112b(a)(1)(iii)] Federally Enforceable Through Title V Permit
15. Each opening in the internal floating roof 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. [District Rule 4623, 5.5.2.1.2, 40 CFR 60.112b(a)(1)(iv)] Federally Enforceable Through Title V Permit
16. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.1.3 and 40 CFR 60.112b(a)(1)(v)] Federally Enforceable Through Title V Permit
17. 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. [District Rule 4623, 5.5.2.1.4 and 40 CFR 60.112b(a)(1)(vi)] Federally Enforceable Through Title V Permit
18. 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. [District Rule 4623, 5.5.2.1.5 and 40 CFR 60.112b(a)(1)(vii)] Federally Enforceable Through Title V Permit
19. 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. [District Rule 4623, 5.5.2.1.6 and 40 CFR 60.112b(a)(1)(viii)] Federally Enforceable Through Title V Permit
20. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)] Federally Enforceable Through Title V Permit
21. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623, 6.1.4.1, 40 CFR 60.113b(b)(a)(3) and (4)] Federally Enforceable Through Title V Permit
22. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623, 6.1.4.1] Federally Enforceable Through Title V Permit

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

23. For this vessel which is equipped with a double seal system, inspections may be carried out as specified above, or using the following procedure every 5 years: Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals each time the vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other opening in the seal or the seal fabric, or the secondary seal has holes, tears, or other opening in the seal or seal fabric, or the gaskets no longer close off the liquid surfaces, or the slotted membrane has more than 10 percent open area, the operator shall make necessary repairs prior to filling the vessel. [40 CFR 60.113b(a)(3) and (4)] Federally Enforceable Through Title V Permit
24. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623, 6.1.4.3] Federally Enforceable Through Title V Permit
25. Vapor pressure of stored liquids shall be determined as described in section 6.4 of District Rule 4623 (amended 5/19/05). [District Rule 4623, 6.2 and 40 CFR 60.116b(e)(2) and (3)] Federally Enforceable Through Title V Permit
26. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623, 6.3.5] Federally Enforceable Through Title V Permit
27. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3.7] Federally Enforceable Through Title V Permit
28. Records of monthly organic liquid throughput shall be maintained on the premises and shall be made available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
29. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
30. The operator shall visually inspect the internal floating roof, the primary seal and the secondary seal prior to filling the storage vessel. If holes, tears, or other openings are found, they shall be repaired prior to filling. [40 CFR 60.113b(a)(1)] Federally Enforceable Through Title V Permit
31. Operator shall notify the APCO in writing 30 days prior to the filling or refilling of the vessel. If the inspection is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall make notification 7 days prior to refilling the tank. [40 CFR 60.113b(a)(5)] Federally Enforceable Through Title V Permit
32. Records of each inspection shall be maintained. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment. If any defects are detected during an inspection, operator shall provide the APCO with a report within 30 days of the inspection. The report shall identify the storage vessel, the nature of the defects, and the date the vessel was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a)(2), (3) and (4)] Federally Enforceable Through Title V Permit
33. The operator shall keep readily available accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The operator shall also keep a record of the liquid stored, the period of storage, and the maximum true vapor pressure of the liquid during the respective storage period. [40 CFR 60.116b(b) and (c)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

34. Available data on the storage temperature may be used to determine the maximum true vapor pressure. For vessels operated above or below ambient temperatures, the maximum true vapor pressure may be calculated using the highest expected calendar month average of the storage temperature. For vessels operated at ambient temperature, the maximum true vapor pressure may be calculated using maximum local monthly ambient temperatures as reported by the National Weather Service. [40 CFR 60.116b(e)(1)] Federally Enforceable Through Title V Permit
35. For crude oil or refined petroleum products the vapor pressure may be obtained by either: a) available data on the Reid vapor pressure and maximum expected storage temperature from nomographs contained in API Bulletin 2517, b) obtained from standard reference texts, c) determined by ASTM Method D2879-83, or c) measured or calculated by an appropriate method approved by the APCO. [40 CFR 60.116b(e)(2) and (3)] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1077-26-9

**EXPIRATION DATE:** 05/31/2016

**EQUIPMENT DESCRIPTION:**

135.0 HP LOADING RACK #1 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3

## PERMIT UNIT REQUIREMENTS

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1. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.4 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
2. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit
3. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rule 2520, 9.3, 40CFR 60.502 (j)] Federally Enforceable Through Title V Permit
4. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
5. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
6. Each detected leak shall be repaired within 15 calendar days of detection. [40 CFR 60.502 (j)] Federally Enforceable Through Title V Permit
7. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520, 9.3 and 40CFR 60.505 (c)] Federally Enforceable Through Title V Permit
8. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.3.1 and Fresno County Rule 412] Federally Enforceable Through Title V Permit

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

9. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624, 6.3.2 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
10. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.3 and 40CFR60.503(d)] Federally Enforceable Through Title V Permit
11. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.6 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
12. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
13. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
14. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
15. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
16. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.08 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624, 5.1.1, 40 CFR 60.502(b) and Fresno County Rule 412] Federally Enforceable Through Title V Permit
17. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
19. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4607] Federally Enforceable Through Title V Permit
20. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1077-27-9

**EXPIRATION DATE:** 05/31/2016

**EQUIPMENT DESCRIPTION:**

130.0 HP LOADING RACK #2 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3

## PERMIT UNIT REQUIREMENTS

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1. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.4 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
2. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit
3. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rule 2520, 9.3, 40CFR 60.502 (j)] Federally Enforceable Through Title V Permit
4. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
5. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
6. Each detected leak shall be repaired within 15 calendar days of detection. [40 CFR 60.502 (j)] Federally Enforceable Through Title V Permit
7. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520, 9.3 and 40CFR 60.505 (c)] Federally Enforceable Through Title V Permit
8. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.3.1 and Fresno County Rule 412] Federally Enforceable Through Title V Permit

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

9. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624, 6.3.2 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
10. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.3 and 40CFR60.503(d)] Federally Enforceable Through Title V Permit
11. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.6 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
12. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
13. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
14. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
15. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
16. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.08 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624, 5.1.1, 40 CFR 60.502(b) and Fresno County Rule 412] Federally Enforceable Through Title V Permit
17. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
19. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4607] Federally Enforceable Through Title V Permit
20. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1077-28-9

**EXPIRATION DATE:** 05/31/2016

**EQUIPMENT DESCRIPTION:**

115.0 HP LOADING RACK #3 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3

## PERMIT UNIT REQUIREMENTS

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1. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.4 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
2. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit
3. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rule 2520, 9.3, 40CFR 60.502 (j)] Federally Enforceable Through Title V Permit
4. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
5. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
6. Each detected leak shall be repaired within 15 calendar days of detection. [40 CFR 60.502 (j)] Federally Enforceable Through Title V Permit
7. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520, 9.3 and 40CFR 60.505 (c)] Federally Enforceable Through Title V Permit
8. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.3.1 and Fresno County Rule 412] Federally Enforceable Through Title V Permit

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

9. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624, 6.3.2 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
10. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.3 and 40CFR60.503(d)] Federally Enforceable Through Title V Permit
11. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.6 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
12. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
13. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
14. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
15. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
16. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.08 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624, 5.1.1, 40 CFR 60.502(b) and Fresno County Rule 412] Federally Enforceable Through Title V Permit
17. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
19. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4607] Federally Enforceable Through Title V Permit
20. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1077-29-9

**EXPIRATION DATE:** 05/31/2016

**EQUIPMENT DESCRIPTION:**

215.0 HP LOADING RACK #4 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3

## PERMIT UNIT REQUIREMENTS

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1. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.4 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
2. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit
3. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rule 2520, 9.3, 40CFR 60.502 (j)] Federally Enforceable Through Title V Permit
4. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
5. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
6. Each detected leak shall be repaired within 15 calendar days of detection. [40 CFR 60.502 (j)] Federally Enforceable Through Title V Permit
7. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520, 9.3 and 40CFR 60.505 (c)] Federally Enforceable Through Title V Permit
8. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.3.1 and Fresno County Rule 412] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624, 6.3.2 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
10. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.3 and 40CFR60.503(d)] Federally Enforceable Through Title V Permit
11. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.6 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
12. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
13. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
14. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
15. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
16. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.08 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624, 5.1.1, 40 CFR 60.502(b) and Fresno County Rule 412] Federally Enforceable Through Title V Permit
17. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
19. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4607] Federally Enforceable Through Title V Permit
20. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-38-9

EXPIRATION DATE: 05/31/2016

## EQUIPMENT DESCRIPTION:

115.0 HP LOADING RACK #6 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3

## PERMIT UNIT REQUIREMENTS

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1. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.4 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
2. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit
3. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rule 2520, 9.3, 40CFR 60.502 (j)] Federally Enforceable Through Title V Permit
4. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
5. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
6. Each detected leak shall be repaired within 15 calendar days of detection. [40 CFR 60.502 (j)] Federally Enforceable Through Title V Permit
7. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520, 9.3 and 40CFR 60.505 (c)] Federally Enforceable Through Title V Permit
8. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.3.1 and Fresno County Rule 412] Federally Enforceable Through Title V Permit

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

9. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624, 6.3.2 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
10. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.3 and 40CFR60.503(d)] Federally Enforceable Through Title V Permit
11. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.6 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
12. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
13. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
14. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
15. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
16. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.08 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624, 5.1.1, 40 CFR 60.502(b) and Fresno County Rule 412] Federally Enforceable Through Title V Permit
17. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
19. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4607] Federally Enforceable Through Title V Permit
20. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-42-5

EXPIRATION DATE: 05/31/2016

## EQUIPMENT DESCRIPTION:

LOADING RACK #5 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO JOHN ZINK VAPOR BURNER.

## PERMIT UNIT REQUIREMENTS

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1. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.4 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
2. Construction, reconstruction (as defined in District Rule 4001, amended 4/14/99), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit
3. During the loading of organic liquids, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rule 2520, 9.3, 40CFR 60.502 (j)] Federally Enforceable Through Title V Permit
4. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
5. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
6. Each detected leak shall be repaired within 15 calendar days of detection. [40 CFR 60.502 (j)] Federally Enforceable Through Title V Permit
7. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520, 9.3 and 40CFR 60.505 (c)] Federally Enforceable Through Title V Permit
8. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.3.1 and Fresno County Rule 412] Federally Enforceable Through Title V Permit

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

9. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 432, or ARB Method 2-4. [District Rule 4624, 6.3.2 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
10. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.3 and 40CFR60.503(d)] Federally Enforceable Through Title V Permit
11. Loading and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.6 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
12. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624, 5.2] Federally Enforceable Through Title V Permit
13. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624, 5.1] Federally Enforceable Through Title V Permit
14. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
15. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624] Federally Enforceable Through Title V Permit
16. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.08 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624, 5.1.1, 40 CFR 60.502(b) and Fresno County Rule 412, 5.1] Federally Enforceable Through Title V Permit
17. Records of daily gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District Rule 4624, 6.3] Federally Enforceable Through Title V Permit
18. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-51-2

EXPIRATION DATE: 05/31/2016

## EQUIPMENT DESCRIPTION:

TWO LANE FUEL LOADING RACK #8 WITH EIGHT LOADING STATIONS PER LANE CONTROLLED BY THE VAPOR COMBUSTION SYSTEM LISTED UNDER PERMIT C-1077-3, AND PERMIT EXEMPT DIESEL DYE INJECTION AND FUEL ADDITIVE INJECTION

## PERMIT UNIT REQUIREMENTS

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1. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.4 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
2. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit
3. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rule 2520, 9.3, 40CFR 60.502 (j)] Federally Enforceable Through Title V Permit
4. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
5. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
6. Each detected leak shall be repaired within 15 calendar days of detection. [40 CFR 60.502 (j)] Federally Enforceable Through Title V Permit
7. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520, 9.3 and 40CFR 60.505 (c)] Federally Enforceable Through Title V Permit
8. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.3.1 and Fresno County Rule 412] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624, 6.3.2 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
10. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.3 and 40CFR60.503(d)] Federally Enforceable Through Title V Permit
11. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624, 5.6 and Fresno County Rule 412] Federally Enforceable Through Title V Permit
12. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
13. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
14. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
15. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
16. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.08 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624, 5.1.1, 40 CFR 60.502(b) and Fresno County Rule 412] Federally Enforceable Through Title V Permit
17. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
19. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4607] Federally Enforceable Through Title V Permit
20. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

**APPENDIX B**  
**Certificate of Conformity**

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: SFPP, L.P.	FACILITY ID: C- 1077
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

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

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

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

  
\_\_\_\_\_  
Signature of Responsible Official

1/6/12  
\_\_\_\_\_  
Date

Jim Giles

\_\_\_\_\_  
Name of Responsible Official (please print)

Director of Operations

\_\_\_\_\_  
Title of Responsible Official (please print)

**APPENDIX C**  
**Health Risk Analysis Summary**

# San Joaquin Valley Air Pollution Control District Risk Management Review

To: Stanley Tom – Permit Services  
 From: Kou Thao – Technical Services  
 Date: 3-1-12  
 Facility Name: SFPP L.P  
 Location: 4149 S Maple Ave Fresno, CA  
 Application #(s): -7-5, 18-6, 23-6, 26-10, 27-10, 28-10, 29-10, 38-10, 42-6, 51-3  
 Project #: C-1120110

## A. RMR SUMMARY

RMR Summary						
Permit Unit	Prioritization Score	Acute Hazard Index	Chronic Hazard Index	Maximum Individual Cancer Risk (10 <sup>-6</sup> )	T-BACT Required?	Special Permit Conditions?
1,260,000 gal tank (7-5)	0.00	3.37E-06	2.82E-06	2.54E-09	NO	Yes
1,470,000 gal tank (18-6)	0.00	5.57E-06	5.48E-06	4.94E-09	NO	Yes
2,520,000 gal tank (23-6)	0.00	1.25E-05	1.97E-05	1.78E-08	NO	Yes
135 hp loading rack (26-10)	0.00	6.83E-06	1.10E-07	9.95E-11	NO	Yes
130 hp loading rack (27-10)	0.00	7.90E-06	1.10E-07	9.91E-11	NO	Yes
115 hp loading rack (28-10)	0.00	6.47E-07	1.19E-07	1.07E-10	NO	Yes
215 hp loading rack (29-10)	0.00	6.90E-06	1.24E-07	1.13E-10	NO	Yes
115 hp loading rack (38-10)	0.00	6.03E-06	1.10E-07	9.96E-11	NO	Yes
80 hp loading rack (42-6)	0.00	6.09E-06	1.09E-07	9.83E-11	NO	Yes
199 hp loading rack (51-3)	0.00	5.22E-06	1.32E-07	1.19E-11	NO	Yes
<b>Project Total<sup>1</sup></b>	<b>0.00<sup>1</sup></b>	<b>6.69E-05<sup>1</sup></b>	<b>2.88E-05<sup>1</sup></b>	<b>2.59E-08<sup>1</sup></b>		
<b>Facility Total<sup>2</sup></b>	<b>2.944<sup>2,3</sup></b>	<b>1.06E-02<sup>2,3</sup></b>	<b>1.03E-02<sup>2,3</sup></b>	<b>6.27E-06<sup>2,3</sup></b>		
1. The risk scores for each unit associated to this project are specific with the proposal to store and load B100 bio-diesel. 2. The facility total risk scores for the permitted units above do not accurately represent the true total facility risk. The facility risk scores above are the cumulative scores of all proposed fuel types to be stored and loaded through these permitted units. It is understood that not all fuel types will be stored simultaneously and therefore will not have the facility risk scores presented above. 3. Note that regardless of which proposed fuel type is stored, the total facility cancer risk is approaching 10 in a million.						

### Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

Units: -7-5, 18-6, 23-6, 26-10, 27-10, 28-10, 29-10, 38-10, 42-6, 51-3

For this permit unit all biodiesel blend-stock shall be considered B100 biodiesel. No other biodiesel blend-stock shall be permitted unless approved by the District.

## B. RMR REPORT

### I. Project Description

Technical Services received a request on February 7, 2012, to perform a Risk Management Review for a proposed modification of existing storage tank units -7, -18, -23 and loading rack units -26, -27, -28, -29, -42, -38, -51, and install a biodiesel blend-stock unloading rack to add the capability to store and load B100 biodiesel fuel.

### II. Analysis

Material Safety Data Sheets provided by the permitting engineer for the proposed B100 biodiesel blend stock indicated that 99.9 % of B100 biodiesel is comprised of Soy Methyl Ester and 0.1% is No. 2 diesel. Soy Methyl Esters are not considered a HAP, therefore the VOC emission rates provided by the permitting engineer were proportioned appropriately to represent that only 0.1% of the emitted VOCs is from No. 2 diesel. The adjusted VOC emission rates were used by Technical Services to perform a health risk assessment using the toxic emissions from Diesel and Gasoline Tank Fugitives spreadsheet. Emissions were calculated using emission factors based on the 1995 District memo Toxic Emissions Inventory Plan Regarding Diesel and Gasoline Storage Weight Fractions.. The potential cumulative prioritization scores were greater than 1.0, thus modeling was conducted using the AERMOD model, with the parameters outlined below and meteorological data for 2005-2009 from Fresno to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid. Since each of the units involved in this project is located in a different area of the facility, staff requested the location of each permitted unit and modeled each unit separately.

The following are the analysis parameters for each unit:

Analysis Parameters								
Permit Unit	Source Type	Area Radius (m)	Release Height (m)	Location Type	Closest Receptor (m)	Type of Receptor	Pollutant	Adjusted Emission Rate (lb/hr)
1,260,000 gal tank (7-5)	Area Cir	9.75	15.972	Urban	200	Business	VOC	0.00056
1,470,000 gal tank (18-6)	Area Cir	11.13	14.326	Urban	200	Business	VOC	0.00069
2,520,000 gal tank (23-6)	Area Cir	14.47	14.478	Urban	200	Business	VOC	0.00106

Permit Unit	Source Type	X-length (m)	Y-length (m)	Release Height (m)	Location Type	Closest Receptor (m)	Type of Receptor	Pollutant	Adjusted Emission Rate (lb/hr)
135 hp loading rack (26-10)	Area	12.16	18.24	1	Urban	200	Business	VOC	0.0003
130 hp loading rack (27-10)	Area	13.18	18.24	1	Urban	200	Business	VOC	0.0003
115 hp loading rack (28-10)	Area	12.16	20.27	1	Urban	200	Business	VOC	0.0003
215 hp loading rack (29-10)	Area	13.18	21.28	1	Urban	200	Business	VOC	0.0003
115 hp loading rack (38-10)	Area	30.41	6.08	1	Urban	200	Business	VOC	0.0003
80 hp loading rack (42-6)	Area	30.41	6.08	1	Urban	200	Business	VOC	0.0003
199 hp loading rack (51-3)	Area	11.15	27.37	1	Urban	200	Business	VOC	0.0003

### III. Conclusion

The acute and chronic indices are below 1.0 and the cancer risk associated with the project is less than 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on page 1 of this report must be included for this proposed unit.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

### IV. Attachments

- A. RMR request from the project engineer
- B. Additional information from the applicant/project engineer
- C. Toxic emissions summary
- D. Prioritization score
- E. Facility Summary

**APPENDIX D**  
**Draft ATCs**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT

**PERMIT NO:** C-1077-7-5

**LEGAL OWNER OR OPERATOR:** SFPP, L.P.  
**MAILING ADDRESS:** 1100 TOWN & COUNTRY ROAD  
ORANGE, CA 92868

**LOCATION:** 4149 S MAPLE AVE  
FRESNO, CA 93725

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 1,260,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-4, INTERNAL FLOATING ROOF EQUIPPED WITH A LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM-MOUNTED SECONDARY SEAL MADE OF STEEL COMPRESSION PLATES AND A RUBBER WIPER BLADE TIP: ALLOW STORAGE OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK AND INSTALL RECIRCULATION SYSTEM WITH ELECTRIC HEATER

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Petroleum distillates includes the following products: diesel, biodiesel blends, and B100 biodiesel blendstock. [District Rule 2080] Federally Enforceable Through Title V Permit
4. The electronic heater shall not operate unless the storage tank is in biodiesel blendstock service. [District Rule 2080] Federally Enforceable Through Title V Permit
5. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, District Rule 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services  
C-1077-7-5 : Mar 7 2012 11:48AM - TOMS : Joint Inspection NOT Required

6. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
7. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623] Federally Enforceable Through Title V Permit
8. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
9. The cumulative length of all gaps, between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
10. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
11. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
12. Cumulative length of all gaps between the tank shell and secondary seal greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference for all seal types. [District Rule 4623] Federally Enforceable Through Title V Permit
13. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623] Federally Enforceable Through Title V Permit
15. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
16. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
17. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
18. All openings in the roof used for sampling and gauging, except pressure-vacuum valves comply with section 5.2, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be leak free, except when the device or appurtenance is in use for sampling or gauging. [District Rule 4623] Federally Enforceable Through Title V Permit
19. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
20. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. Each opening in the internal floating roof 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. [District Rule 4623] Federally Enforceable Through Title V Permit
22. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623] Federally Enforceable Through Title V Permit
23. Rim 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. [District Rule 4623] Federally Enforceable Through Title V Permit
24. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623] Federally Enforceable Through Title V Permit
25. 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. The fabric sleeve must be impermeable. [District Rule 4623] Federally Enforceable Through Title V Permit
26. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
27. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623] Federally Enforceable Through Title V Permit
28. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623] Federally Enforceable Through Title V Permit
29. Vapor pressure of stored liquids shall be determined as described in section 6.4 of District Rule 4623 (revised 5/19/05). [District Rule 4623] Federally Enforceable Through Title V Permit
30. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all information necessary to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
31. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
32. Records of monthly organic liquid throughput shall be maintained on the premises and shall be made available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
33. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-1077-18-6

**LEGAL OWNER OR OPERATOR:** SFPP, L.P.  
**MAILING ADDRESS:** 1100 TOWN & COUNTRY ROAD  
ORANGE, CA 92868

**LOCATION:** 4149 S MAPLE AVE  
FRESNO, CA 93725

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 1,470,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-16, INTERNAL FLOATING ROOF EQUIPPED WITH PDM'S DELTA PRIMARY SEAL AND WIPER TYPE SECONDARY SEAL: ALLOW STORAGE OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Petroleum distillates includes the following products: diesel, biodiesel blends, and B100 biodiesel blendstock. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520] Federally Enforceable Through Title V Permit
5. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
6. The total annual gasoline throughput for Tank FR-16 shall not exceed 17,520,000 barrels. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

**DAVID WARNER, Director of Permit Services**

C-1077-18-6 : Mar 7 2012 11:48AM - TOMS : Joint Inspection NOT Required

7. Daily VOC emissions shall not exceed 16.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623] Federally Enforceable Through Title V Permit
9. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The cumulative length of all gaps, between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
11. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
12. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
13. Cumulative length of all gaps between the tank shell and secondary seal greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference for all seal types. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
15. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623] Federally Enforceable Through Title V Permit
16. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
17. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
18. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
19. All openings in the roof used for sampling and gauging, except pressure-vacuum valves comply with section 5.2, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be leak-free, except when the device or appurtenance is in use. [District Rule 4623] Federally Enforceable Through Title V Permit
20. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
21. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

22. Each opening in the internal floating roof 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. [District Rule 4623] Federally Enforceable Through Title V Permit
23. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623] Federally Enforceable Through Title V Permit
24. Rim 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. [District Rule 4623] Federally Enforceable Through Title V Permit
25. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623] Federally Enforceable Through Title V Permit
26. 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. The fabric sleeve must be impermeable. [District Rule 4623] Federally Enforceable Through Title V Permit
27. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
28. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623] Federally Enforceable Through Title V Permit
29. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623] Federally Enforceable Through Title V Permit
30. Vapor pressure of stored liquids shall be determined as described in section 6.4 of District Rule 4623 (revised 5/19/05). [District Rule 4623] Federally Enforceable Through Title V Permit
31. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
32. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
33. Records of monthly organic liquid throughput shall be maintained on the premises and shall be made available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
34. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**  
**DRAFT**

**PERMIT NO:** C-1077-23-6

**LEGAL OWNER OR OPERATOR:** SFPP, L.P.  
**MAILING ADDRESS:** 1100 TOWN & COUNTRY ROAD  
ORANGE, CA 92868

**LOCATION:** 4149 S MAPLE AVE  
FRESNO, CA 93725

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 2,520,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-21, INTERNAL FLOATING ROOF EQUIPPED WITH URETHANE FABRIC "RESILIENT TOROIDAL SEAL" WITH WOVEN NYLON INSERT, AND "FOAM LOGS" INSERTED BETWEEN TANK SHELL AND PAN RIM: ALLOW STORAGE OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Petroleum distillates includes the following products: diesel, biodiesel blends, and B100 biodiesel blendstock. [District Rule 2080] Federally Enforceable Through Title V Permit
4. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
5. No gap between the tank shell and the primary seal shall exceed one-half (1/2) inch. The cumulative length of all primary seal gaps greater than one-eighth (1/8) inch shall not exceed five (5) percent of the tank circumference. No continuous gap greater than one-eighth (1/8) inc shall exceed ten (10) percent of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

**DRAFT**

DAVID WARNER, Director of Permit Services

C-1077-23-6 : Mar 7 2012 11:48AM -- TOMS : Joint Inspection NOT Required

6. No gap between the tank shell and the secondary seal shall exceed one-half (1/2) inch. The cumulative length of all gaps between the tank shell and the secondary seal, greater than one-eighth (1/8) inch shall not exceed five (5) percent of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
7. No gap between the tank shell and the secondary seal shall exceed one-half (1/2) inch. [District Rule 4623] Federally Enforceable Through Title V Permit
8. The secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
9. The secondary seal shall allow easy insertion of probes up to one-half (1/2) in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
10. All openings in the roof used for sampling and gauging, except pressure-vacuum valves comply with section 5.2, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be leak-free, except when the device or appurtenance is in use. [District Rule 4623] Federally Enforceable Through Title V Permit
11. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
12. The permittee shall comply with all other applicable provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
13. The permittee shall comply with all applicable provisions of 40 CFR 60 Subpart Kb. [40 CFR 60 Subpart Kb] Federally Enforceable Through Title V Permit
14. The permittee shall comply with recordkeeping requirements in section 6.3 of District Rule 4623 (amended 5/19/05) including recording type of liquid stored, storage temperature, and Reid vapor pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
15. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [District Rule 4623 and 40 CFR 60.112b(a)(1)(i)] Federally Enforceable Through Title V Permit
16. The internal floating roof tank 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. [District Rule 4623 and 40 CFR 60.112b(a)(1)(ii)] Federally Enforceable Through Title V Permit
17. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623 and 40 CFR 60.112b(a)(1)(iii)] Federally Enforceable Through Title V Permit
18. Each opening in the internal floating roof 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. [District Rule 4623 and 40 CFR 60.112b(a)(1)(iv)] Federally Enforceable Through Title V Permit
19. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623 and 40 CFR 60.112b(a)(1)(v)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. 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. [District Rule 4623 and 40 CFR 60.112b(a)(1)(vi)] Federally Enforceable Through Title V Permit
21. 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. [District Rule 4623 and 40 CFR 60.112b(a)(1)(vii)] Federally Enforceable Through Title V Permit
22. 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. [District Rule 4623 and 40 CFR 60.112b(a)(1)(viii)] Federally Enforceable Through Title V Permit
23. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)] Federally Enforceable Through Title V Permit
24. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623 and 40 CFR 60.113b(b)(a)(3) and (4)] Federally Enforceable Through Title V Permit
25. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623] Federally Enforceable Through Title V Permit
26. For this vessel which is equipped with a double seal system, inspections may be carried out as specified above, or using the following procedure every 5 years: Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals each time the vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other opening in the seal or the seal fabric, or the secondary seal has holes, tears, or other opening in the seal or seal fabric, or the gaskets no longer close off the liquid surfaces, or the slotted membrane has more than 10 percent open area, the operator shall make necessary repairs prior to filling the vessel. [40 CFR 60.113b(a)(3) and (4)] Federally Enforceable Through Title V Permit
27. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623] Federally Enforceable Through Title V Permit
28. Vapor pressure of stored liquids shall be determined as described in section 6.4 of District Rule 4623 (amended 5/19/05). [District Rule 4623 and 40 CFR 60.116b(e)(2) and (3)] Federally Enforceable Through Title V Permit
29. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
30. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
31. Records of monthly organic liquid throughput shall be maintained on the premises and shall be made available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

32. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
33. The operator shall visually inspect the internal floating roof, the primary seal and the secondary seal prior to filling the storage vessel. If holes, tears, or other openings are found, they shall be repaired prior to filling. [40 CFR 60.113b(a)(1)] Federally Enforceable Through Title V Permit
34. Operator shall notify the APCO in writing 30 days prior to the filling or refilling of the vessel. If the inspection is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall make notification 7 days prior to refilling the tank. [40 CFR 60.113b(a)(5)] Federally Enforceable Through Title V Permit
35. Records of each inspection shall be maintained. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment. If any defects are detected during an inspection, operator shall provide the APCO with a report within 30 days of the inspection. The report shall identify the storage vessel, the nature of the defects, and the date the vessel was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a)(2), (3) and (4)] Federally Enforceable Through Title V Permit
36. The operator shall keep readily available accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The operator shall also keep a record of the liquid stored, the period of storage, and the maximum true vapor pressure of the liquid during the respective storage period. [40 CFR 60.116b(b) and (c)] Federally Enforceable Through Title V Permit
37. Available data on the storage temperature may be used to determine the maximum true vapor pressure. For vessels operated above or below ambient temperatures, the maximum true vapor pressure may be calculated using the highest expected calendar month average of the storage temperature. For vessels operated at ambient temperature, the maximum true vapor pressure may be calculated using maximum local monthly ambient temperatures as reported by the National Weather Service. [40 CFR 60.116b(e)(1)] Federally Enforceable Through Title V Permit
38. For crude oil or refined petroleum products the vapor pressure may be obtained by either: a) available data on the Reid vapor pressure and maximum expected storage temperature from nomographs contained in API Bulletin 2517, b) obtained from standard reference texts, c) determined by ASTM Method D2879-83, or c) measured or calculated by an appropriate method approved by the APCO. [40 CFR 60.116b(e)(2) and (3)] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-1077-26-10

**LEGAL OWNER OR OPERATOR:** SFPP, L.P.  
**MAILING ADDRESS:** 1100 TOWN & COUNTRY ROAD  
ORANGE, CA 92868

**LOCATION:** 4149 S MAPLE AVE  
FRESNO, CA 93725

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 135.0 HP LOADING RACK #1 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Petroleum distillates includes the following products: diesel, biodiesel blends, and B100 biodiesel blendstock. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624] Federally Enforceable Through Title V Permit
5. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

**DAVID WARNER**, Director of Permit Services

C-1077-26-10 : Mar 7 2012 11:49AM - TOMS : Joint Inspection NOT Required

6. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rules 2520 and 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
7. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520] Federally Enforceable Through Title V Permit
8. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520] Federally Enforceable Through Title V Permit
9. The permittee shall maintain an inspection log containing at least the following: A) date and time of leak and drainage inspections, B) type of component leaking, C) leak determination method, D) findings, E) date and time of leak repair, and emission level of recheck after leak is repaired, F) method used to minimize the leak to lowest possible level within 72 hours after detection, and G) inspector name and signature. [District Rules 2520 and 4624 and 40 CFR 60.505(c)] Federally Enforceable Through Title V Permit
10. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624] Federally Enforceable Through Title V Permit
11. VOC emissions from the vapor collection and control system shall be determined annually using 40 CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624] Federally Enforceable Through Title V Permit
12. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520 and 40 CFR 60.503(d)] Federally Enforceable Through Title V Permit
13. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624] Federally Enforceable Through Title V Permit
14. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624] Federally Enforceable Through Title V Permit
15. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624] Federally Enforceable Through Title V Permit
16. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624] Federally Enforceable Through Title V Permit
18. All leaking components shall be repaired or replaced within 72 hours of discovery. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
19. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.02 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624 and 40 CFR 60.502(b)] Federally Enforceable Through Title V Permit
20. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
22. All records shall be retained for a period of at least 5 years and shall be made available for APCO, ARB, or EPA inspection upon request. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit
23. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-1077-27-10

**LEGAL OWNER OR OPERATOR:** SFPP, L.P.  
**MAILING ADDRESS:** 1100 TOWN & COUNTRY ROAD  
ORANGE, CA 92868

**LOCATION:** 4149 S MAPLE AVE  
FRESNO, CA 93725

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF MODIFICATION OF 130.0 HP LOADING RACK #2 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Petroleum distillates includes the following products: diesel, biodiesel blends, and B100 biodiesel blendstock. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624] Federally Enforceable Through Title V Permit
5. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services

C-1077-27-10 : Mar 7 2012 11:49AM - TOMS : Joint Inspection NOT Required

6. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rules 2520 and 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
7. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520] Federally Enforceable Through Title V Permit
8. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520] Federally Enforceable Through Title V Permit
9. The permittee shall maintain an inspection log containing at least the following: A) date and time of leak and drainage inspections, B) type of component leaking, C) leak determination method, D) findings, E) date and time of leak repair, and emission level of recheck after leak is repaired, F) method used to minimize the leak to lowest possible level within 72 hours after detection, and G) inspector name and signature. [District Rules 2520 and 4624 and 40 CFR 60.505(c)] Federally Enforceable Through Title V Permit
10. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624] Federally Enforceable Through Title V Permit
11. VOC emissions from the vapor collection and control system shall be determined annually using 40 CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624] Federally Enforceable Through Title V Permit
12. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520 and 40 CFR 60.503(d)] Federally Enforceable Through Title V Permit
13. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624] Federally Enforceable Through Title V Permit
14. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624] Federally Enforceable Through Title V Permit
15. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624] Federally Enforceable Through Title V Permit
16. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624] Federally Enforceable Through Title V Permit
18. All leaking components shall be repaired or replaced within 72 hours of discovery. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
19. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.02 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624 and 40 CFR 60.502(b)] Federally Enforceable Through Title V Permit
20. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
22. All records shall be retained for a period of at least 5 years and shall be made available for APCO, ARB, or EPA inspection upon request. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit
23. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-1077-28-10

**LEGAL OWNER OR OPERATOR:** SFPP, L.P.  
**MAILING ADDRESS:** 1100 TOWN & COUNTRY ROAD  
ORANGE, CA 92868

**LOCATION:** 4149 S MAPLE AVE  
FRESNO, CA 93725

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 115.0 HP LOADING RACK #3 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Petroleum distillates includes the following products: diesel, biodiesel blends, and B100 biodiesel blendstock. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624] Federally Enforceable Through Title V Permit
5. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

**DRAFT**

DAVID WARNER, Director of Permit Services  
C-1077-28-10: Mar 7 2012 11:49AM - TOMS : Joint Inspection NOT Required

6. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rules 2520 and 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
7. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520] Federally Enforceable Through Title V Permit
8. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520] Federally Enforceable Through Title V Permit
9. The permittee shall maintain an inspection log containing at least the following: A) date and time of leak and drainage inspections, B) type of component leaking, C) leak determination method, D) findings, E) date and time of leak repair, and emission level of recheck after leak is repaired, F) method used to minimize the leak to lowest possible level within 72 hours after detection, and G) inspector name and signature. [District Rules 2520 and 4624 and 40 CFR 60.505(c)] Federally Enforceable Through Title V Permit
10. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624] Federally Enforceable Through Title V Permit
11. VOC emissions from the vapor collection and control system shall be determined annually using 40 CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624] Federally Enforceable Through Title V Permit
12. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520 and 40 CFR 60.503(d)] Federally Enforceable Through Title V Permit
13. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624] Federally Enforceable Through Title V Permit
14. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624] Federally Enforceable Through Title V Permit
15. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624] Federally Enforceable Through Title V Permit
16. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624] Federally Enforceable Through Title V Permit
18. All leaking components shall be repaired or replaced within 72 hours of discovery. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
19. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.02 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624 and 40 CFR 60.502(b)] Federally Enforceable Through Title V Permit
20. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
22. All records shall be retained for a period of at least 5 years and shall be made available for APCO, ARB, or EPA inspection upon request. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit
23. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-1077-29-10

**LEGAL OWNER OR OPERATOR:** SFPP, L.P.  
**MAILING ADDRESS:** 1100 TOWN & COUNTRY ROAD  
ORANGE, CA 92868

**LOCATION:** 4149 S MAPLE AVE  
FRESNO, CA 93725

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 215.0 HP LOADING RACK #4 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Petroleum distillates includes the following products: diesel, biodiesel blends, and B100 biodiesel blendstock. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624] Federally Enforceable Through Title V Permit
5. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director YAPCO

**DRAFT**

DAVID WARNER, Director of Permit Services

C-1077-29-10 : Mar 7 2012 11:49AM - TDMS : Joint Inspection NOT Required

6. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rules 2520 and 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
7. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520] Federally Enforceable Through Title V Permit
8. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520] Federally Enforceable Through Title V Permit
9. The permittee shall maintain an inspection log containing at least the following: A) date and time of leak and drainage inspections, B) type of component leaking, C) leak determination method, D) findings, E) date and time of leak repair, and emission level of recheck after leak is repaired, F) method used to minimize the leak to lowest possible level within 72 hours after detection, and G) inspector name and signature. [District Rules 2520 and 4624 and 40 CFR 60.505(c)] Federally Enforceable Through Title V Permit
10. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624] Federally Enforceable Through Title V Permit
11. VOC emissions from the vapor collection and control system shall be determined annually using 40 CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624] Federally Enforceable Through Title V Permit
12. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520 and 40 CFR 60.503(d)] Federally Enforceable Through Title V Permit
13. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624] Federally Enforceable Through Title V Permit
14. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624] Federally Enforceable Through Title V Permit
15. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624] Federally Enforceable Through Title V Permit
16. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624] Federally Enforceable Through Title V Permit
18. All leaking components shall be repaired or replaced within 72 hours of discovery. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
19. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.02 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624 and 40 CFR 60.502(b)] Federally Enforceable Through Title V Permit
20. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
22. All records shall be retained for a period of at least 5 years and shall be made available for APCO, ARB, or EPA inspection upon request. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit
23. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-1077-38-10

**LEGAL OWNER OR OPERATOR:** SFPP, L.P.  
**MAILING ADDRESS:** 1100 TOWN & COUNTRY ROAD  
ORANGE, CA 92868

**LOCATION:** 4149 S MAPLE AVE  
FRESNO, CA 93725

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 115.0 HP LOADING RACK #6 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO ONE JOHN ZINK ZTOF VAPOR BURNER COMBUSTION SYSTEM LISTED UNDER C-1077-3: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Petroleum distillates includes the following products: diesel, biodiesel blends, and B100 biodiesel blendstock. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624] Federally Enforceable Through Title V Permit
5. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

**DRAFT**

DAVID WARNER, Director of Permit Services  
C-1077-38-10 : Mar 7 2012 11:49AM -- TOMS : Joint Inspection NOT Required

6. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rules 2520 and 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
7. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520] Federally Enforceable Through Title V Permit
8. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520] Federally Enforceable Through Title V Permit
9. The permittee shall maintain an inspection log containing at least the following: A) date and time of leak and drainage inspections, B) type of component leaking, C) leak determination method, D) findings, E) date and time of leak repair, and emission level of recheck after leak is repaired, F) method used to minimize the leak to lowest possible level within 72 hours after detection, and G) inspector name and signature. [District Rules 2520 and 4624 and 40 CFR 60.505(c)] Federally Enforceable Through Title V Permit
10. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624] Federally Enforceable Through Title V Permit
11. VOC emissions from the vapor collection and control system shall be determined annually using 40 CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624] Federally Enforceable Through Title V Permit
12. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520 and 40 CFR 60.503(d)] Federally Enforceable Through Title V Permit
13. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624] Federally Enforceable Through Title V Permit
14. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624] Federally Enforceable Through Title V Permit
15. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624] Federally Enforceable Through Title V Permit
16. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624] Federally Enforceable Through Title V Permit
18. All leaking components shall be repaired or replaced within 72 hours of discovery. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
19. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.02 pounds per 1000 gallons of organic liquid with greatest vapor pressure loaded. [District Rule 4624 and 40 CFR 60.502(b)] Federally Enforceable Through Title V Permit
20. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
22. All records shall be retained for a period of at least 5 years and shall be made available for APCO, ARB, or EPA inspection upon request. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit
23. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-1077-42-6

**LEGAL OWNER OR OPERATOR:** SFPP, L.P.  
**MAILING ADDRESS:** 1100 TOWN & COUNTRY ROAD  
ORANGE, CA 92868

**LOCATION:** 4149 S MAPLE AVE  
FRESNO, CA 93725

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF LOADING RACK #5 FOR PETROLEUM PRODUCTS, WITH ORGANIC VAPORS EXHAUSTED TO JOHN ZINK VAPOR BURNER: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Petroleum distillates includes the following products: diesel, biodiesel blends, and B100 biodiesel blendstock. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624] Federally Enforceable Through Title V Permit
5. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

**DAVID WARNER, Director of Permit Services**  
C-1077-42-6: Mar 7 2012 11:49AM - TOMS : Joint Inspection NOT Required

6. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rules 2520 and 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
7. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520] Federally Enforceable Through Title V Permit
8. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520] Federally Enforceable Through Title V Permit
9. The permittee shall maintain an inspection log containing at least the following: A) date and time of leak and drainage inspections, B) type of component leaking, C) leak determination method, D) findings, E) date and time of leak repair, and emission level of recheck after leak is repaired, F) method used to minimize the leak to lowest possible level within 72 hours after detection, and G) inspector name and signature. [District Rules 2520 and 4624 and 40 CFR 60.505(c)] Federally Enforceable Through Title V Permit
10. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624] Federally Enforceable Through Title V Permit
11. VOC emissions from the vapor collection and control system shall be determined annually using 40 CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Method 2-4. [District Rule 4624] Federally Enforceable Through Title V Permit
12. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520 and 40 CFR 60.503(d)] Federally Enforceable Through Title V Permit
13. Transfer rack and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or and no excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rule 4624] Federally Enforceable Through Title V Permit
14. The product and vapor lines shall be connected and disconnected in a manner such that liquid and vapor emissions will be minimized. [District Rule 4624] Federally Enforceable Through Title V Permit
15. All liquid transfer lines, piping, and associated fittings shall be maintained in a leak tight condition. [District Rule 4624] Federally Enforceable Through Title V Permit
16. Processor and support equipment, including vapor return lines and connections, must be maintained in proper operating condition at all times. Permittee shall comply with all maintenance instructions associated with vapor control equipment. [District Rule 4624] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

17. The vapor control system shall be maintained in proper operating condition at all times. [District Rule 4624] Federally Enforceable Through Title V Permit
18. All leaking components shall be repaired or replaced within 72 hours of discovery. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
19. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.02 pounds per 1000 gallons or organic liquid with greatest vapor pressure loaded. [District Rule 4624 and 40 CFR 60.502(b)] Federally Enforceable Through Title V Permit
20. The facility maximum gasoline throughput shall not exceed either of the following limits: 3.4 million gallons per day or 876 million gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Records of daily and annual gasoline throughput shall be maintained, retained on the premises, and made available to District staff upon request. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
22. All records shall be retained for a period of at least 5 years and shall be made available for APCO, ARB, or EPA inspection upon request. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit
23. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4624, Fresno County Rule 412 and 40 CFR 60 Subpart XX. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-1077-51-3

**LEGAL OWNER OR OPERATOR:** SFPP, L.P.  
**MAILING ADDRESS:** 1100 TOWN & COUNTRY ROAD  
ORANGE, CA 92868

**LOCATION:** 4149 S MAPLE AVE  
FRESNO, CA 93725

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF TWO LANE FUEL LOADING RACK #8 WITH EIGHT LOADING STATIONS PER LANE CONTROLLED BY THE VAPOR COMBUSTION SYSTEM LISTED UNDER PERMIT C-1077-3, AND PERMIT EXEMPT DIESEL DYE INJECTION AND FUEL ADDITIVE INJECTION: ALLOW LOADING OF DIESEL, BIODIESEL BLENDS, AND B100 BIODIESEL BLENDSTOCK

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Petroleum distillates includes the following products: diesel, biodiesel blends, and B100 biodiesel blendstock. [District Rule 2080] Federally Enforceable Through Title V Permit
4. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624] Federally Enforceable Through Title V Permit
5. Construction, reconstruction (as defined in 40 CFR 60.15), or expansion of any top loading facility shall not be allowed. [District Rule 4624] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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DAVID WARNER, Director of Permit Services  
C-1077-51-3: Mar 7 2012 11:49AM - TOMS : Joint Inspection NOT Required

6. During the loading of petroleum products, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rules 2520 and 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
7. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520] Federally Enforceable Through Title V Permit
8. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520] Federally Enforceable Through Title V Permit
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