



MAR 12 2014

Mr. Jeremy Wiggins  
Plains Marketing, L.P.  
3600 Bowman Ct  
Bakersfield, CA 93308

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-1199  
Project # 1140703**

Dear Mr. Wiggins:

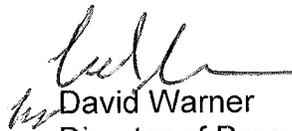
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) S-1199-20-0 into the Title V operating permit. The ATC authorized a crude oil unloading rack.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct (ATC) S-1199-20-0, and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-1140703

Engineer: Richard Edgehill  
Date: March 4, 2014

Facility Number: S-1199  
Facility Name: Plains Marketing, L.P.  
Mailing Address: 3600 Bowman Ct  
Bakersfield, CA 93308

Contact Name: Jeremy Wiggins  
Phone: (661) 336-7913  
Title: Environmental Specialist  
Lead Engineer: Alan Phillips *AS PER ARE* MAR 04 2014

Responsible Official: Troy Valenzuela

## I. PROPOSAL

Plains Marketing, L.P. is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct S-1199-20-0 into the Title V operating permit. The project authorized a crude oil unloading rack.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## II. FACILITY LOCATION

The authorized equipment is located at the Pentland Pump Station, Maricopa, CA SE Section 10, T11N, R23W.

## III. EQUIPMENT DESCRIPTION

PTO S-1199-20-1: CRUDE OIL UNLOADING RACK #220 WITH PUMP AND ASSOCIATED HOSES, VALVES, FLANGES, AND THREADED CONNECTIONS

#### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

#### **V. APPLICABLE REQUIREMENTS**

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

S-1199-20

As the permit unit is new there are no proposed modifications to existing permits.

#### **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, 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.

Plains Marketing LP  
S-1199, 1140703

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

### **VIII. ATTACHMENTS**

- A. Proposed Title V PTO S-1199-20-1
- B. Authority to Construct S-1199-20-0
- C. Permit Application

Plains Marketing LP  
S-1199, 1140703

# ATTACHMENT A

Proposed Title V PTO  
S-1199-20-1

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-1199-20-1

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

**SECTION:** SE10 **TOWNSHIP:** 11N **RANGE:** 23W

**EQUIPMENT DESCRIPTION:**

CRUDE OIL UNLOADING RACK #227 WITH PUMP AND ASSOCIATED HOSES, VALVES, FLANGES, AND THREADED CONNECTIONS

## PERMIT UNIT REQUIREMENTS

1. Unloading Rack 227 shall be used only for unloading. [District Rule 2201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Transfer rack shall be maintained and operated in accordance with the manufacturer's specifications, and operated such that there are no leaks or excess organic liquid drainage at disconnections as defined herein. [District Rule 4624] Federally Enforceable Through Title V Permit
4. All liquids and gases from the unload operation shall be routed to one of the following systems: a vapor collection and control system; a fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); a floating roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or 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 a closed VOC emission control system. [District Rules 4623 and 4624] Federally Enforceable Through Title V Permit
5. 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 when receiving unloaded liquids for compliance with Rule 4624. [District Rule 4624] Federally Enforceable Through Title V Permit
6. Total number of disconnects shall not exceed 10 per day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. During hose disconnects the maximum liquid spillage for liquids shall not exceed 10 milliliters/disconnect based on an average from 3 consecutive disconnects. [District Rule 2201 and 4624] Federally Enforceable Through Title V Permit
8. Emissions from light liquid components shall not exceed 0.3 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall maintain accurate component count and emissions calculated using CAPCOA Average Emission Factors for Marketing Terminals, from California Implementation Guidelines for Estimating Emissions of Fugitive Hydrocarbon Leaks at Marketing Terminals, Table IV-2b, February 1999. [District Rule 2201] Federally Enforceable Through Title V Permit
10. For this Class 1 organic liquid transfer operation, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District Rule 4624] 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. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute; or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above a background as methane when measured in accordance with the test method in Section 6.3.8 or alternative method approved in writing by the APCO and EPA. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from equipment into a container is not considered a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4624] Federally Enforceable Through Title V Permit
12. Permittee shall inspect the unloading rack for leaks during transfer at least once every calendar quarter using the test method prescribed in Section 6.3.8 of Rule 4624 or alternative method approved in writing by the APCO and EPA. [District Rule 4624] Federally Enforceable Through Title V Permit
13. 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 of Rule 4624 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency shall revert back to quarterly and the operator shall contact the APCO in writing within 14 days. [District Rule 4624] Federally Enforceable Through Title V Permit
14. Corrective steps shall be taken at any time the operator observes a leak or excess drainage at disconnect. All equipment 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 replaced equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624] Federally Enforceable Through Title V Permit
15. All inspections shall be documented with an inspection log. Inspection records shall include, at a minimum, 1) date of inspection, 2) location and description of any missing, loose, leaking, or damaged equipment and any malfunction requiring repair, 3) corrective steps taken to repair or replace the equipment, 4) test method and results for leak and drainage inspections, 5) location and description of any equipment to be inspected upon commencing operation after repair or replacement and 6) inspector name and signature. [District Rule 4624] Federally Enforceable Through Title V Permit
16. Permittee shall keep records of daily unloading rack throughput and the results of any required leak inspections. [District Rule 4624] Federally Enforceable Through Title V Permit
17. Permittee shall keep records of daily number of truck unloading disconnects. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
18. Records shall be retained for a minimum of five years and shall be made readily available to the APCO, ARB, or EPA during normal business hours and submitted upon request to the APCO, ARB, or EPA. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit

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

DRAFT

# **ATTACHMENT B**

Authority to Construct

S-1199-20-0

# AUTHORITY TO CONSTRUCT

PERMIT NO: S-1199-20-0

ISSUANCE DATE: 03/08/2012

LEGAL OWNER OR OPERATOR: PLAINS MARKETING LP  
MAILING ADDRESS: ATTN: JEREMY WIGGINS  
3600 BOWMAN CT  
BAKERSFIELD, CA 93308

LOCATION: PENTLAND PUMP STATION  
MARICOPA, CA

SECTION: SE10 TOWNSHIP: 11N RANGE: 23W

## EQUIPMENT DESCRIPTION:

CRUDE OIL UNLOADING RACK #220 WITH PUMP AND ASSOCIATED HOSES, VALVES, FLANGES, AND THREADED CONNECTIONS

## CONDITIONS

---

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Unloading Rack 220 shall be used only for unloading. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Transfer rack shall be maintained and operated in accordance with the manufacturer's specifications, and operated such that there are no leaks or excess organic liquid drainage at disconnections as defined herein. [District Rule 4624] Federally Enforceable Through Title V Permit
5. All liquids and gases from the unload operation shall be routed to one of the following systems: a vapor collection and control system; a fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); a floating roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or 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 a closed VOC emission control system. [District Rules 4623 and 4624] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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.

Sayed Sadredin, Executive Director / APCO

---

DAVID WARNER, Director of Permit Services

S-1199-20-0 : Feb 27 2014 12:53PM - EDGEHILR : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

6. 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 when receiving unloaded liquids for compliance with Rule 4624. [District Rule 4624] Federally Enforceable Through Title V Permit
7. Total number of disconnects shall not exceed 10 per day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. During hose disconnects the maximum liquid spillage for liquids shall not exceed 10 milliliters/disconnect based on an average from 3 consecutive disconnects. [District Rule 2201 and 4624] Federally Enforceable Through Title V Permit
9. Emissions from light liquid components shall not exceed 0.3 lb-VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Permittee shall maintain accurate component count and emissions calculated using CAPCOA Average Emission Factors for Marketing Terminals, from California Implementation Guidelines for Estimating Emissions of Fugitive Hydrocarbon Leaks at Marketing Terminals, Table IV-2b, February 1999. [District Rule 2201] Federally Enforceable Through Title V Permit
11. For this Class 1 organic liquid transfer operation, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District Rule 4624] Federally Enforceable Through Title V Permit
12. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute; or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above a background as methane when measured in accordance with the test method in Section 6.3.8 or alternative method approved in writing by the APCO and EPA. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from equipment into a container is not considered a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4624] Federally Enforceable Through Title V Permit
13. Permittee shall inspect the unloading rack for leaks during transfer at least once every calendar quarter using the test method prescribed in Section 6.3.8 of Rule 4624 or alternative method approved in writing by the APCO and EPA. [District Rule 4624] Federally Enforceable Through Title V Permit
14. 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 of Rule 4624 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency shall revert back to quarterly and the operator shall contact the APCO in writing within 14 days. [District Rule 4624] Federally Enforceable Through Title V Permit
15. Corrective steps shall be taken at any time the operator observes a leak or excess drainage at disconnect. All equipment 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 replaced equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624] Federally Enforceable Through Title V Permit
16. All inspections shall be documented with an inspection log. Inspection records shall include, at a minimum, 1) date of inspection, 2) location and description of any missing, loose, leaking, or damaged equipment and any malfunction requiring repair, 3) corrective steps taken to repair or replace the equipment, 4) test method and results for leak and drainage inspections, 5) location and description of any equipment to be inspected upon commencing operation after repair or replacement and 6) inspector name and signature. [District Rule 4624] Federally Enforceable Through Title V Permit
17. Permittee shall keep records of daily unloading rack throughput and the results of any required leak inspections. [District Rule 4624] Federally Enforceable Through Title V Permit
18. Permittee shall keep records of daily number of truck unloading disconnects. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
19. Records shall be retained for a minimum of five years and shall be made readily available to the APCO, ARB, or EPA during normal business hours and submitted upon request to the APCO, ARB, or EPA. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit

# ATTACHMENT C

## Permit Application

RECEIVED

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

FEB 24 2014

SJVAPCD  
Southern Region

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: PLAINS MARKETING, L.P.	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>BAK-00 ACCOUNTS PAYABLE / PO BOX 4648</u> CITY: <u>HOUSTON</u> STATE: <u>TX</u> 9-DIGIT ZIP CODE: <u>77210-4648</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>PENTLAND PUMP STATION</u> CITY: <u>MARICOPA</u> SE <u>10</u> SECTION <u>10</u> TOWNSHIP <u>11N</u> RANGE <u>23W</u>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <u>CRUDE OIL PIPELINE</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  IMPLEMENTATION OF THE FOLLOWING ATC'S INTO THE FACILITY TITLE V PERMIT:  S-1199-20-0	
6. TYPE OR PRINT NAME OF APPLICANT: JEREMY WIGGINS	TITLE OF APPLICANT: ENVIRONMENTAL SPECIALIST
7. SIGNATURE OF APPLICANT: 	DATE: <u>11/19/13</u> PHONE: (661) 336-7913 FAX: (661) 336-7920 EMAIL: jgwiggins@paalp.com

For APCD Use Only:

EnviroTech Consultants, Inc

DATE STAMP	FILING FEE RECEIVED: \$ <u>19.00</u> CHECK#: <u>4221</u>
	DATE PAID: <u>2/24/14</u>
	PROJECT NO: <u>51140703</u> FACILITY ID: <u>3-1199</u>

RECEIVED

FEB 24 2014

SJVAPCD  
Southern Region

# 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: PLAINS MARKETING L.P.	FACILITY ID: S-1199
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: PLAINS MARKETING, L.P.	
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 foregoing is correct and true:

Troy E. Valenzuela  
 Signature of Responsible Official

11-20-2013  
 Date

Troy E. Valenzuela  
 Name of Responsible Official (please print)

Vice President - EH&S  
 Title of Responsible Official (please print)