



MAY 24 2010

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # N-2369
Project # N1094512

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. BP West Coast Products, LLC is proposing a Title V minor permit modification to modify Permit to Operate (PTO) N-2369-31-0 of the facility's current Title V operating permit. This permit is for the installation of two rental 8,000 gallon horizontal fixed-roof tanks to process petroleum-contaminated rain water or storage of organic liquid (gasoline) and one permit-exempt 21,000 gallon rental processed water storage tank. These tanks serve as a temporary replacement emissions unit for permits N-2369-12 and N-2369-13 to allow the inspection and/or repair of Tank 7, permitted under N-2369-13.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO N-2369-31-1, application, ATC N-2369-31-0, Facility-Wide Title V PTO, and the Emissions Change. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW: RD/cm

Enclosures

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



MAY 24 2010

Charles Lee
Ref: BP West Coast Products, LLC
Trinity Consultants, Inc
One Technology Drive, Suite F-215
Irvine, CA 92618

**Re: Notice of Minor Title V Permit Modification
District Facility # N-2369
Project # N1094512**

Dear Mr. Lee:

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 modify Permit(s) to Operate N-2369-31-0 of the current Title V operating permit. This permit is for the installation of two rental 8,000 gallon horizontal fixed-roof tanks to process petroleum-contaminated rain water or storage of organic liquid (gasoline) and one permit-exempt 21,000 gallon rental processed water storage tank. These tanks serve as a temporary replacement emissions unit for permits N-2369-12 and N-2369-13 to allow the inspection and/or repair of Tank 7, permitted under N-2369-13.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO N-2369-31-1, application, ATC N-2369-31-0, Facility-Wide Title V PTO, and the Emissions Change. This project will be finalized after the 45-day EPA comment period.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW: RD/cm

Enclosures

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

Date: April 29, 2010

Facility Number: N-2369
Facility Name: BP West Coast Products, LLC
Mailing Address: 2700 W Washington Street
Stockton, CA 95203

Contact Name: Charles Lee
Phone: (949) 296-4100 ext. 102
Fax: (949) 296-4101

Responsible Official: Michael Peterson
Title: Terminal Manager

Processing Staff: Rick Dyer
Project Number: N1094512

I. PROPOSAL

BP West Coast Products, LLC has proposed to incorporate two 8,000 gallon horizontal fixed-roof tanks (Rental Tanks 1 & 2) to process petroleum-contaminated rain water or store organic liquid (gasoline) in case of an emergency event at the site and one permit-exempt 21,000 gallon rental processed water storage tank (Rental Tank 3), permitted under Authority to Construct (ATC) N-2369-31-0, into their Title V operating permit.

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 revising permit conditions established on ATC N-2369-31-0.

II. FACILITY LOCATION

The equipment will be located at 2700 W Washington Street in Stockton, CA.

III. EQUIPMENT DESCRIPTION

For N-2369-31-1:

TWO 8,000 GALLON FIXED-ROOF PETROLEUM-CONTAMINATED WATER/EMERGENCY STANDBY ORGANIC LIQUID STORAGE TANKS AND A PERMIT-EXEMPT PROCESSED WATER STORAGE TANK. THE TANKS ARE SERVED BY A CARBON ADSORPTION SYSTEM. THESE TANKS SERVE AS A TEMPORARY REPLACEMENT EMISSIONS UNIT FOR PERMITS N-2369-12 AND N-

2369-13 TO ALLOW THE INSPECTION AND/OR REPAIR OF TANK 7 PERMITTED UNDER N-2369-13.

IV. SCOPE OF EPA AND PUBLIC REVIEW

The proposed project is a Minor Modification to the Title V permit. Therefore, public review is not required.

V. APPLICABLE REQUIREMENTS

District Rule 2520 Federally Mandated Operating Permits (6/21/01)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

BP West Coast Products, LLC is proposing to incorporate ATC N-2369-31-0 into the Title V Permit to Operate as Permit to Operate (PTO) N-2369-31-1. This permit is for two 8,000 gallon petroleum-contaminated/emergency standby organic liquid storage tanks and a permit-exempt process water storage tank. These tanks serve as a temporary replacement emissions unit for permit units N-2369-12 and N-2369-13 to allow the inspection and any repairs to Tank 7, permitted under N-2369-13. A copy of the ATC, N-2369-31-0, is included in Appendix II of this document. The following changes were made to the ATC conditions when creating the Permit to Operate:

1. ATC condition #1 states, "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]".

The facility has submitted an application on November 24, 2009 to incorporate ATC N-2369-31-0, which was issued on January 28, 2010. The application to modify the Title V permit was submitted with the ATC application. This application is included in Appendix III of this document. Therefore, this condition has been removed from the permit.

2. ATC condition #2 states, "No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]".

The condition is listed on the facility-wide permit, N-2369-0-1. Therefore, this condition has been removed from the permit.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project 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.

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 (Appendix IV) ;
2. The source's suggested draft permit (Appendix I); 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 (Appendix III).

Compliance is expected with this Rule.

APPENDICES

Appendix I: Proposed Draft Title V Operating Permit: N-2369-31-1

Appendix II: Authority to Construct: N-2369-31-0 & Facility-Wide Title V Operating Permit: N-2369-0-1

Appendix III: Permit Application

Appendix IV: Emissions Change

Appendix I

Proposed Modified Title V Operating Permit: N-2369-31-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-2369-31-1

EXPIRATION DATE: 06/30/2009

EQUIPMENT DESCRIPTION:

TWO 8,000 GALLON FIXED-ROOF PETROLEUM-CONTAMINATED WATER/EMERGENCY STANDBY ORGANIC LIQUID STORAGE TANKS AND A PERMIT-EXEMPT PROCESSED WATER TANK. THE TANKS ARE SERVED BY A CARBON ADSORPTION SYSTEM. THESE TANKS SERVE AS A TEMPORARY REPLACEMENT EMISSIONS UNIT (TREU) FOR PERMITS N-2369-12 AND N-2369-13 TO ALLOW THE INSPECTION AND/OR REPAIR OF TANK 7 PERMITTED UNDER N-2369-13.

PERMIT UNIT REQUIREMENTS

1. 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] Federally Enforceable Through Title V Permit
2. All emergency situations such as fires and/or significant product spills outside of primary containment shall be reported to the District immediately. [District 2201 Rule] Federally Enforceable Through Title V Permit
3. The rental tanks must be removed from service in less than 180 days from the implementation date (startup date of the rental tanks) of this Authority to Construct, but not later than January 10, 2011. The permittee shall maintain records indicating the implementation date and days of operation of this TREU at this facility. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The rental tanks shall be vented to the carbon adsorption system, which has at least two 2,000-pounds activated carbon containing canisters connected in series configuration. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The control efficiency of the carbon adsorption system shall be at least 95%. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall replace the used carbon canister when the combined organic liquid storage time for the rental tanks reaches 144 hours. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The rental tanks shall be maintained in a leak-free condition. [District Rule 2201] 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 (referenced as methane) above background, as measured by a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate or more than three drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
9. During emergency organic liquid storage, the Reid Vapor Pressure (RVP) shall not exceed the following limits: RVP = 10 for winter months (October 1st to March 1st) and RVP = 7 for summer months (April 1st to September 30th). [District Rule 2201] Federally Enforceable Through Title V Permit
10. The rental tanks may be used for emergency organic liquid storage not to exceed a total of 60 days in a 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The combined VOC emissions from the rental tanks shall not exceed 3.6 pounds per day or 648 pounds per year. [District 2201 Rule] 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 daily throughput of organic liquid and/or petroleum-contaminated water shall not exceed 8,000 gallons for each rental tank. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall keep records of the date(s) organic liquid or petroleum-contaminated water is first introduced in each tank, the date(s) when each tank is fully drained, and records of the duration of time that each tank is used. [District Rule 4623] Federally Enforceable Through Title V Permit
14. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this permit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Operator shall maintain an inspection log containing the following 1) Type of leak; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Gas leaks over 10,000 ppmv or liquid leaks more than three drops per minute shall be reported as a deviation. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. 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

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

DRAFT

Appendix II

**Authority to Construct: N-2369-31-0
&
Facility-Wide Title V Operating Permit: N-2369-0-1**



AUTHORITY TO CONSTRUCT

PERMIT NO: N-2369-31-0

ISSUANCE DATE: 01/28/2010

LEGAL OWNER OR OPERATOR: BP WEST COAST PRODUCTS, LLC
MAILING ADDRESS: 2700 W WASHINGTON STREET
STOCKTON, CA 95203

LOCATION: 2700 W WASHINGTON STREET
STOCKTON, CA 95203

EQUIPMENT DESCRIPTION:

TWO 8,000 GALLON FIXED-ROOF PETROLEUM-CONTAMINATED WATER/EMERGENCY STANDBY ORGANIC LIQUID STORAGE TANKS AND A PERMIT-EXEMPT PROCESSED WATER TANK. THE TANKS ARE SERVED BY A CARBON ADSORPTION SYSTEM. THESE TANKS SERVE AS A TEMPORARY REPLACEMENT EMISSIONS UNIT FOR PERMITS N-2369-12 AND N-2369-13 TO ALLOW THE INSPECTION AND/OR REPAIR OF TANK 7 PERMITTED UNDER N-2369-13.

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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. 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]
4. All emergency situations such as fires and/or significant product spills outside of primary containment shall be reported to the District immediately. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The rental tanks must be removed from service in less than 180 days from the implementation date (startup date of the rental tanks) of this Authority to Construct, but not later than January 10, 2011. The permittee shall maintain records indicating the implementation date and days of operation of this TREU at this facility. [District Rules 1070 & 2201]
6. The rental tanks shall be vented to the carbon adsorption system, which has at least two 2,000-pounds activated carbon containing canisters connected in series configuration. [District Rule 2201]
7. The control efficiency of the carbon adsorption system shall be at least 95%. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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 Sacredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services

N-2369-31-0; Jan 27 2010 11:08AM - DYERR : Joint Inspection NOT Required

8. The permittee shall replace the used carbon canister when the combined organic liquid storage time for the rental tanks reaches 144 hours. [District Rule 2201]
9. The rental tanks shall be maintained in a leak-free condition. [District Rule 2201]
10. 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 (referenced as methane) above background, as measured by a portable hydrocarbon detection instrument that is calibrated with methane in accordance with EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate or more than three drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
11. During emergency organic liquid storage, the Reid Vapor Pressure (RVP) shall not exceed the following limits: RVP = 10 for winter months (October 1st to March 1st) and RVP = 7 for summer months (April 1st to September 30th). [District Rule 2201]
12. The rental tanks may be used for emergency organic liquid storage not to exceed a total of 60 days in a 12-month period. [District Rule 2201]
13. The combined VOC emissions from the rental tanks shall not exceed 3.6 pounds per day or 648 pounds per year. [District NSR Rule]
14. The daily throughput of organic liquid and/or petroleum-contaminated water shall not exceed 8,000 gallons for each rental tank. [District Rule 2201]
15. The operator shall keep records of the date(s) organic liquid or petroleum-contaminated water is first introduced in each tank, the date(s) when each tank is fully drained, and records of the duration of time that each tank is used. [District Rule 4623]
16. A facility operator, upon detection of a leaking component, shall affix to that component a weatherproof readily visible tag bearing the date on which the leak is detected. The tag shall remain in place until the leaking component is repaired, reinspected and found to be in compliance with the requirements of this permit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. Operator shall maintain an inspection log containing the following 1) Type of leak; 2) Date of leak detection, and method of detection; 3) Date and emission level of recheck after leak is repaired. Gas leaks over 10,000 ppmv or liquid leaks more than three drops per minute shall be reported as a deviation. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. 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

San Joaquin Valley Air Pollution Control District

FACILITY: N-2369-0-1

EXPIRATION DATE: 06/30/2009

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: BP WEST COAST PRODUCTS, LLC
Location: 2700 W WASHINGTON STREET, STOCKTON, CA 95203
N-2369-0-1 : Apr 29 2010 12:42PM - DYERR

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. On December 31, 2004, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. The total stationary source VOC emissions shall be less than 50 tons per year. A year, for this condition, is any 12 month period based on a monthly rolling average. [District Rule 2520] Federally Enforceable Through Title V Permit
44. The total stationary source emission limit for combined hazardous air pollutants shall be less than 25 tons per year. A year, for this condition, is any 12 month period based on a monthly rolling average. [District Rule 2520] Federally Enforceable Through Title V Permit
45. The total stationary source emission limit for any one hazardous air pollutant shall be less than 10 tons per year. A year, for this condition, is any 12 month period based on a monthly rolling average. [District Rule 2520] Federally Enforceable Through Title V Permit

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

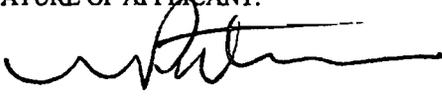
Appendix III
Permit Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: BP West Coast Products, LLC	
2. MAILING ADDRESS: STREET/P.O. BOX: 2700 W Washington Street CITY: Stockton STATE: CA 9-DIGIT ZIP CODE: 95203	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: 2700 W Washington Street CITY: Stockton ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: UPON PERMIT APPROVAL
4. GENERAL NATURE OF BUSINESS: Class 1 Organic Liquid Loading Facility	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Tank 7 (Permit # N-2369-13-2) will be taken out of service for approximately 60 to 75 days for an API inspection. While Tank 7 is out of service, a rental tank will be used to replace Tank 7. The rental tank will be functionally identical to Tank 7 and will qualify as a Temporary Replacement Emissions Unit (TREU).	
6. TYPE OR PRINT NAME OF APPLICANT: Michael Peterson	TITLE OF APPLICANT: Terminal Manager
7. SIGNATURE OF APPLICANT: 	DATE: 11/18/09 PHONE: (510) 231-4706 FAX: (510) 231-4701 EMAIL: Michael.Peterson3@bp.com

For APCD Use Only: **BP**

DATE STAMP NOV 24 2009	FILING FEE RECEIVED: \$ 19.00 DATE PAID: 11-23-09 PROJECT NO: N1094512	CHECK#: 150455910 FACILITY ID: N2369
----------------------------------	---	---

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

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I TYPE OF PERMIT ACTION (Check appropriate box)

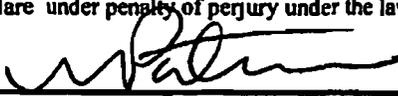
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE AMENDMENT
 MINOR PERMIT MODIFICATION

COMPANY NAME	BP West Coast Products LLC	FACILITY ID	N = 2369
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	BP West Coast Products LLC		
3 Agent to the Owner	CHARLES LEE		

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

- Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s)
- Based on information and belief formed after reasonable inquiry the source 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


Signature of Responsible Official

11/18/09
Date

Michael Peterson
Name of Responsible Official (please print)

Terminal Manager
Title of Responsible Official (please print)

Appendix IV
Emissions Change

Permit #: N-2369-31-1	Last Updated
Facility: BP WEST COAST PRODUCTS, LLC	04/29/2010 DYERR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	648.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	3.6
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					