



JAN 25 2016

Ms. Diana Furman
Pacific Gas and Electric Company
PO Box 7640
San Francisco, CA 94120

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # N-608
Project # 1153488**

Dear Ms. Furman:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project authorizes a new tank and loadout operation.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority 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. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

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

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Executive Director/Air Pollution Control Officer

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California Health & Safety Code 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 McDonald Island Compressor Station, Holt, California. There is no K-12 school within 1,000 feet of this location. Therefore, school notice is not required under California Health & Safety Code 42301.6.

IV. PROCESS DESCRIPTION

The proposed project includes pipeline liquid condensate transfer, storage and loadout operation that will occur at PG&E's natural gas compression yard. During natural gas compression, various hydrocarbons condense and accumulate in the pipeline. Currently, the captured liquids are separated into aqueous and hydrocarbon streams via oil-water separator systems, and subsequently routed to appropriate storage vessels.

Proposed Modification

The oil water separator systems will be bypassed and the condensate liquid will be re-routed directly into a 2,000 gallon tank. The condensate will be loaded out into a tanker truck and will be shipped to an offsite facility for processing.

V. EQUIPMENT LISTING

N-608-33-0: PIPELINE LIQUID TRANSFER, STORAGE, AND LOADOUT OPERATION
CONSISTING OF A 2,000 GALLON CONVAULT ABOVEGROUND FIXED
ROOF STORAGE TANK (D-1A) EQUIPPED WITH A PRESSURE VACUUM
RELIEF VALVE, AND TANKER TRUCK LOADOUT EQUIPMENT

VI. EMISSION CONTROL TECHNOLOGY EVALUATION

To reduce VOC emissions, PG&E has proposed to equip the tank with a pressure-vacuum relief valve.

VII. GENERAL CALCULATIONS

A. Assumptions

- VOC is the only pollutant of concern related to this project.
- The pipeline liquid stored in the tank is a mixture several VOC including gasoline range organics (C5-C12), diesel range organics (C10-C28), motor oil range organics (C24-C36), and several other organic compounds. The physical and

chemical properties of this liquid are assumed to be similar to light crude oil crude oil i.e. API gravity 20 degrees or greater and molecular weight = 50 lb/lb-mol for calculation of tank emissions.

- Breather vent setting -0.31/+0.90 (vacuum/pressure) as per applicant.
- Truck loadout throughput 2,000 gallons/day, 16,000 gallons/yr
- Storage tank throughput, 900 gallons/day, 16,000 gallons/yr
- To estimate daily emissions, it is assumed that 16,000 gallons of organic liquid is loaded into the tank in a month of July, which is considered to be the hottest month in the San Joaquin Valley
- Existing fugitive emissions components associated with the condensate collection point to the tank and from the tank to the loadout process were installed prior to the District's unification (1992) and were not previously assessed. There will be some relocation of existing fugitive emissions components with removal of the connection to the oil water separator and addition of the new tank but essentially no change in the number of fugitive emissions components is proposed. As such, this change to fugitive emissions (emissions unit) is not a NSR modification.
- The facility current checks for fugitive emissions leaks on an annual basis using EPA Method 21. Audio/visual inspections of the plant are done by operators every 12 hour shift. Therefore the HON control efficiencies listed EPA's "Protocol for Equipment Leak Emissions Estimates (EPA-453/R-95-017 (November 1995))" and previously approved for project N-608, 1143830 (a similar tank project) are appropriate. The control efficiencies are listed in the Emissions Factor section below.
- Number of fugitive emissions components, 61 light liquid valves, 245 light liquid connectors
- TVP = 1.68 calculated using RVP = 3.3 psia, T = 61.57 deg F (tank bulk liquid ambient temperature in July, Stockton, CA from Tanks 4.0) – see calculation in **Attachment I**.
- Liquid loadout operation, 3 disconnect/day, 24 disconnects/yr
- Tanker trucks are filled by submerged loading with no vapor control

B. Emission Factors (EF)

Tank emissions

The potential emissions will be estimated using EPA's TANKS 4.0.d program – **Attachment I**.

Truck Loadout Disconnect Emissions

The liquid drainage is presumed to be 10 mL per disconnect. The entire amount of liquid drained is assumed to be emitted as VOC. Therefore,

$$EF2 = (10 \text{ mL/disconnect})(7.1 \text{ lb-product/gal})(2.6417 \times 10^{-4} \text{ gal/mL})$$

= 0.019 lb-VOC/disconnect

Fugitive Emissions

Fugitive emissions are calculated using Table 2-1 of EPA's "Protocol for Equipment Leak Emissions Estimates (EPA-453/R-95-017 (November 1995))" with HON control efficiencies as listed in the following table:

Component Type	Source Type	VOC Emission Factor	Control effectiveness
		lb/hr/source	%
Valves	Gas	0.01316	92%
	Light Liquid	0.00889	88%
	Heavy Liquid	0.00051	--
Connectors	Gas	0.00403	93%
	Light Liquid	0.00403	93%
	Heavy Liquid	0.00403	93%

Truck loadout Emissions

EPA's AP-42, Section 5.2, lists the following equation to estimate the emissions from loading petroleum liquids:

$$L_L = 12.46 * S * P * M / T$$

Where

L_L = loading loss, pounds per 1000 gallons of liquid loaded

S = Saturation factor (0.5 for submerged loading submerged loading of a clean cargo tank, AP-42, Table 5.2-1)

P = true vapor pressure of liquid loaded , psia (1.68 psia)

M = Molecular weight of vapors (50 lb/lb-mol)

T = temperature of bulk liquid loaded, degrees R, °R (61.57+ 460 = 521.57 °R)

$$EF2 = 1.0 \text{ lb-VOC}/1,000 \text{ gal of liquid loaded}$$

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Tank emissions

$$PE1 = 0 \text{ lb/day (0 lb/yr)}$$

Truck loadout process

$$PE1 = 0 \text{ lb/day (0 lb/yr)}$$

Fugitive emissions from equipment leaks:

The potential emissions from the existing equipment are estimated using the following equation:

$$PE1 = VOC \text{ (lb/hr/source)} \times \text{comp count} \times (1-CE) \times 24 \text{ hr/day}$$

$$= VOC \text{ (lb/hr/source)} \times \text{component count} \times (1-CE) \times 8,760 \text{ hr/yr}$$

Component Type	Source Type	VOC	CE	Comp Count	PE1	
		lb/hr/source	%		lb/day	lb/yr
Valves	Gas	0.01316	92%	0	0.0	0
	Light Liquid	0.00889	88%	61	1.6	570
	Heavy Liquid	0.00051	--	0	0.0	0
Connectors	Gas	0.00403	93%	0	0.0	0
	Light Liquid	0.00403	93%	245	1.7	605
	Heavy Liquid	0.00403	93%	0	0.0	0
Total:					3.3	1,175

Summary:

Operation/Process	PE1 (lb/day)	PE1 (lb/yr)
Tank emissions	0.0	0
Truck loadout process	0.0	0
Equipment leaks	3.3	1,175
Total:	3.3	1,175

2. Post Project Potential to Emit (PE2)

Tank emissions (see Attachment I)

EPA's TANKS 4.0.d program is used to determine daily and annual VOC emissions. A custom chemical data is made for pipeline liquid using the following information:

Product: Pipeline Liquid
Liquid molecular weight: 207 g/mol
Vapor molecular weight: 50 g/mol
RVP = 3.3 (per applicant)

Per applicant, maximum filling rate will be limited to 900 gal/day and 16,000 gal/yr. This information along with the chemical data (above) will be used in the TANKS program to estimate the potential emissions.

Daily emissions:

To estimate daily emissions, it is assumed that 16,000 gallons of organic liquid is loaded into the tank in a month of July, which is considered to be the hottest month in the San Joaquin Valley. The TANKS results are:

PE2 (working loss) = 30.07 lb-VOC/month
PE2 (breathing loss) = 2.48 lb-VOC/month

The maximum tank filling rate is limited to 900 gal/day. Therefore, the working loss would be:

$$\begin{aligned} \text{PE2 (working loss)} &= (30.07 \text{ lb-VOC/month})(\text{month}/16,000 \text{ gal})(900 \text{ gal/day}) \\ &= 1.7 \text{ lb-VOC/day} \end{aligned}$$

$$\begin{aligned} \text{PE2 (breathing loss)} &= (2.48 \text{ lb-VOC/month})(\text{month}/31 \text{ days}) \\ &= 0.08 \text{ lb-VOC/day} \end{aligned}$$

$$\begin{aligned} \text{Total PE2} &= \text{PE2 (working loss)} + \text{PE2 (breathing loss)} \\ &= 1.7 \text{ lb-VOC/day} + 0.08 \text{ lb-VOC/day} \\ &= \underline{1.8 \text{ lb-VOC/day}} \end{aligned}$$

Annual emissions:

To estimate the annual emissions, it is assumed that 16,000 gallons of organic liquid is loaded into a tank over 12 months. The TANKS results are:

$$\text{PE2} = \underline{25 \text{ lb-VOC/yr}}$$

Fugitive emissions from equipment leaks:

As calculated above.

Truck loadout process

Truck loading emissions:

Per applicant, the maximum loadout rates would be 2,000 gallons/day and 16,000 gallons/year. Thus,

$$\begin{aligned} \text{PE2} &= (1.0 \text{ lb-VOC}/1,000 \text{ gal of liquid loaded})(2,000 \text{ gal/day}) \\ &= \underline{2.0 \text{ lb-VOC/day}} \end{aligned}$$

$$\begin{aligned} \text{PE2} &= (1.0 \text{ lb-VOC}/1,000 \text{ gal of liquid loaded})(16,000 \text{ gal/yr}) \\ &= \underline{16 \text{ lb-VOC/yr}} \end{aligned}$$

Disconnects

$$3 \text{ disconnects per day} \times 0.019 \text{ lb-VOC/disconnect} = 0 \text{ lb/day, } 21 \text{ lb/yr}$$

Operation/Process	PE2 (lb/day)	PE2 (lb/yr)
Tank emissions	1.8	25
Truck loadout process	2.0	16
Disconnects	0.0	21
Equipment leaks	3.3	1,175
Total:	7.1	1,237

Emissions Profile is included in **Attachment II**.

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid ATCs or PTOs at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site. The potential emissions for each permit unit are taken from the application review under project N-1143830.

Permit#	Pollutants (lb/yr)				
	NO _x	SO _x	PM ₁₀	CO	VOC
N-608-1-5	2,315	1	9	95	147
N-608-2-5	2,315	1	9	95	147
N-608-3-5	2,315	1	9	95	147
N-608-4-5	2,315	1	9	95	147
N-608-7-5	9,837	280	748	8,263	17,082
N-608-24-4					
N-608-8-3	0	0	0	0	479
N-608-13-5	830	0	59	178	67
N-608-14-5	830	0	59	178	67
N-608-15-2	297	0	3	489	4
N-608-16-3	0	0	0	0	1
N-608-17-3	0	0	0	0	1
N-608-18-4	15,672	44	2,183	51,808	15,599
N-608-19-4	15,672	44	2,183	51,808	15,599
N-608-20-4	12,186	33	1,673	40,284	12,129
N-608-21-4	12,186	33	1,673	40,284	12,129
N-608-25-5	10,021	286	762	8,418	17,082
N-608-26-5					
N-608-27-1	1,711	269	489	11,611	2,958
N-608-28-1	1,711	269	489	11,611	2,958
N-608-29-1	1,711	269	489	11,611	2,958
N-608-30-1	0	0	0	0	160
N-608-31-1	0	0	0	0	160
N-608-32-0	0	0	0	0	2,135
N-608-33-0 (existing fugitive comp.)	0	0	0	0	1,175
Total without ERCs	91,924	1,531	10,846	236,923	103,331
ERC N-126-3	0	0	0	60,300	0
ERC N-868-1	0	0	0	0	12,402
Total with ERCs	91,924	1,531	10,846	297,223	115,733

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid ATCs or PTOs, except for emissions units proposed to be shut down as part of the Stationary Project, at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Permit#	Pollutants (lb/yr)				
	NO _x	SO _x	PM ₁₀	CO	VOC
N-608-1-5	2,315	1	9	95	147
N-608-2-5	2,315	1	9	95	147
N-608-3-5	2,315	1	9	95	147
N-608-4-5	2,315	1	9	95	147
N-608-7-5	9,837	280	748	8,263	17,082
N-608-24-4					
N-608-8-3	0	0	0	0	479
N-608-13-5	830	0	59	178	67
N-608-14-5	830	0	59	178	67
N-608-15-2	297	0	3	489	4
N-608-16-3	0	0	0	0	1
N-608-17-3	0	0	0	0	1
N-608-18-4	15,672	44	2,183	51,808	15,599
N-608-19-4	15,672	44	2,183	51,808	15,599
N-608-20-4	12,186	33	1,673	40,284	12,129
N-608-21-4	12,186	33	1,673	40,284	12,129
N-608-25-5	10,021	286	762	8,418	17,082
N-608-26-5					
N-608-27-1	1,711	269	489	11,611	2,958
N-608-28-1	1,711	269	489	11,611	2,958
N-608-29-1	1,711	269	489	11,611	2,958
N-608-30-1	0	0	0	0	160
N-608-31-1	0	0	0	0	160
N-608-32-0	0	0	0	0	2,135
N-608-33-0	0	0	0	0	1,237
Total without ERCs	91,924	1,531	10,846	236,923	103,393
ERC N-126-3	0	0	0	60,300	0
ERC N-868-1	0	0	0	0	12,402
Total with ERCs	91,924	1,531	10,846	297,223	115,795

5. Major Source Determination

Rule 2201 Major Source Determination

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- Any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)

- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165.

Rule 2201 Major Source Determination (lb/year)					
Category	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE1	91,924	1,531	10,846	236,923	103,331
SSPE2	91,924	1,531	10,846	236,923	103,393
Major Source Thresholds	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	Yes	Yes

From the above table, the facility is a Major Source for NO_x, CO and VOC emissions.

Rule 2410 Major Source Determination

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore, the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)						
Category	NO ₂	VOC	SO ₂	CO	PM	PM ₁₀
Estimated Facility PE before Project Increase	46	52	0.8	118.5	5.4	5.4
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source?	No	No	No	No	No	No

From the above table, the facility is not an existing Major Source under PSD.

6. **Baseline Emissions (BE)**

The BE calculation (in lbs/year) is performed on a pollutant-by-pollutant basis for each unit within the project to calculate the quarterly net emissions change, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE is equal to pre-project Potential to Emit (PE1) for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

Otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

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Tank, truck loadout, disconnect emissions:
BE = 0 lb-VOC/yr

7. SB-288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the SB 288 Major Modification calculation.

Since this facility is a major source for VOCs, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required. As stated above equipment leak emissions are not included.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NO _x	0	50,000	No
SO _x	0	80,000	No
PM ₁₀	0	30,000	No
VOC	62	50,000	No

Since none of the SB 288 Major Modification Thresholds are surpassed with this project, this project does not constitute an SB 288 Major Modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Per section VII.C.5 of this document, this facility is a Major Source for NO_x, CO and VOC emissions. This project results increase in VOC emissions; therefore, the analysis is limited to VOC emissions only.

Page 5 of the District's draft policy "Implementation of Rule 2201 (as amended on 12/18/08 and effective on 6/10/10) for SB288 Major Modifications and Federal Major Modifications" states, "...calculated emission increases using the procedures below from new or modified emission units that are less than or equal to 0.5 lb/day

are rounded to 0 (consistent with District Policy APR-1130 Increases Maximum Daily Permitted Emissions Less Than or Equal to 0.5 lb/day). This calculation is performed on an emission unit by emission unit basis. New or modified emission units with emission increases that round to 0 shall not constitute a Federal Major Modification."

Tank emissions:

The average emissions increase is determined to be 0.07 lb-VOC/day (25 lb/yr ÷ 365 days/yr), which is below the 0.5 lb/day threshold. Thus, this increase is equated to zero.

Tank loadout process:

Truck loading emissions:

The average emissions increase is determined to be 0.04 lb-VOC/day (16 lb-VOC/yr ÷ 365 days/yr), which is below the 0.05 lb/day threshold. Thus, this increase is equated to zero.

Connect/disconnect hoses during truck loading:

The average emissions increase is determined to be 0.0 lb-VOC/day, which is below the 0.5 lb/day threshold. Thus, this increase is equated to zero.

Summary:

Since the emissions increase from each emissions unit does not exceed 0.5 lb/day threshold for Federal Major Modification, this project is not a Federal Major Modification.

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀
- Lead
- Fluorides
- Sulfuric acid mist
- Hydrogen sulfide (H₂S)
- Total reduced sulfur (including H₂S)
- Reduced sulfur compounds

I. Project Emissions Increase - New Major Source Determination

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project constitutes a new major source subject to PSD requirements.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Total PE from New and Modified Units	0	0.6	0	0	0	0
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	N	N	N	N	N	N

As shown in the table above, the potential to emit for the project, by itself, does not exceed any PSD major source threshold. Therefore Rule 2410 is not applicable and no further analysis is required.

10. Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - PE1, where:

- QNEC = Quarterly Net Emissions Change, lb/qtr.
- PE2 = Post Project Potential to Emit, lb/qtr.
- BEPE1 = Pre-Project Potential to Emit, lb/qtr.

Using the values in Sections VII.C in the evaluation above, quarterly PE2 and quarterly PE1 can be calculated as follows:

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QNEC = 0 for NOx, SOx, CO, and PM10
 QNEC = (1,237 - 1,175)/4 = 16 lb/qtr for VOC

VIII. COMPLIANCE

Rule 2201 New and Modified Stationary Source Review Rule

Note that District Policy APR 1130 states the following

“a total project annual emission increase (Σ [PE2 – PE1] for all units in the project) that averages less than or equal to 0.5 lb/day is rounded to zero (0) lb/day, only for the purposes of determining whether New and Modified Source Review (NSR) rule requirements are triggered.”

Note that the “grandfathered” fugitive emissions calculated previously were included in PE2 for clarity only and are not subject to NSR considerations. Therefore in calculating the daily average of the total project PE2 (annual PE2/365) these emissions are not included.

Operation/Process	PE2 (lb/day)	PE2 (lb/yr)
Tank emissions	1.8	25
Disconnect emissions	0.0	21
Truck loadout process	2.0	16
Total Project Emissions:	3.8	62

For this project the average annual emissions are $62/365 < 0.5$. NSR rule requirements (BACT, offsets, and public notice) are not triggered.

Rule 2410 Prevention of Significant Deterioration

As discussed in section VII.C.9 of this document, this project is not subject to the requirements of this rule.

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/minor modification application.

The Title V Compliance Certification form is included in **Attachment III**.

Rule 4001 New Sources Performance Standards

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

§60.110b: Applicability

This subpart applies to each storage vessel with a capacity greater than 75 m³ (19,813 gal) that is used to store a volatile organic liquid for which construction, reconstruction, or modification is commenced after July 23, 1984. A storage vessel may be exempt from the requirements of this subpart as long as it qualifies §60.110b(b) or §60.110b(d), or meet alternate means of compliance in §60.110b(e).

The proposed operation contains a 2,000 gallon tank. Since the capacity of this tank is below the threshold of 19,813 gallons (as mentioned in the above paragraph), this tank is not subject to the requirements of this subpart.

40 CFR Part 60 Subpart OOOO—Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution

§60.5365: Applicability

This subpart applies to the owner or operator of one or more of the onshore affected facilities listed in paragraphs (a) through (g) of this section for which you commence construction, modification or reconstruction after August 23, 2011.

§60.5365(e) states each storage vessel affected facility, which is a single storage vessel located in the oil and natural gas production segment, natural gas processing segment or

natural gas transmission and storage segment, and has the potential for VOC emissions equal to or greater than 6 tpy as determined according to this section by October 15, 2013 for Group 1 storage vessels and by April 15, 2014, or 30 days after startup (whichever is later) for Group 2 storage vessels, except as provided in paragraphs (e)(1) through (4) of this section. The potential for VOC emissions must be calculated using a generally accepted model or calculation methodology, based on the maximum average daily throughput determined for a 30-day period of production prior to the applicable emission determination deadline specified in this section. The determination may take into account requirements under a legally and practically enforceable limit in an operating permit or other requirement established under a Federal, State, local or tribal authority.

The proposed operations contain a tank that meets the definition of "storage vessel" under this subpart. However, the potential VOC emissions from the tank are 0.03 tons/year, which are below the threshold of 6 tons/year (as mentioned in the above paragraph). Therefore, this tank is not subject to the requirements of this subpart.

Rule 4002 National Emission Standards for Hazardous Air Pollutants

40 CFR Part 63 Subpart HH—National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

The facility is a natural gas distribution facility not a natural gas production facility. The subpart is not applicable.

40 CFR Part 63 Subpart HHH—National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities

§63.1270: Applicability

§63.1270(a) states that this subpart applies to owners and operators of natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and that are major sources of hazardous air pollutants (HAP) emissions as defined in §63.1271.

PG&E (N-608) is not a major source of HAP. Therefore, they are not subject to the requirements in this subpart.

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants, which could cause injury, detriment, nuisance or annoyance to the public. The following condition will be placed on each permit:

- *No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]*

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. Risk Management Review summary results are summarized in the following table (**Attachment IV**):

1. Categories	NG Condensate (Unit 33-0)	Project Totals	Facility Totals
2. Prioritization Score	0.08	0.08	>1
Acute Hazard Index	0.19	0.19	0.8
Chronic Hazard Index	0.00	0.00	0.00
Maximum Individual Cancer Risk (10 ⁻⁶)	0.00	0.00	8.21
3. T-BACT Required?	No		
4. Special Permit Conditions?	No		

The acute and chronic hazard indices were below 1.0; and the cancer risk is less than or equal to 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).

Compliance is expected with this Rule.

Rule 4623 Storage of Organic Liquids

Section 2.0 – Applicability

This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored.

The proposed tank can hold up to 2,000 gallons of organic liquid. Therefore, this tank is subject to the requirements of this rule.

Section 5.1 - VOC Control System Requirements

Except for small producers who are required to comply with the VOC control system requirements in Section 5.1.2, an operator shall not place, hold, or store organic liquid in any tank unless such tank is equipped with a VOC control system identified in Table 1.

The specifications for the VOC control system are described in Sections 5.2, 5.3, 5.4, 5.5, and 5.6. Section 5.1.1 identifies the following VOC control systems.

Tank Design Capacity (TDC) (gallon)	True Vapor Pressure (TVP) of Organic Liquid		
	0.5 psia < TVP <1.5 psia	1.5 psia < TVP <11 psia	TVP ≥ 11 psia
1,100 ≤ TDC ≤ 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
19,800 < TDC ≤ 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
TDC > 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

RVP of the liquid stored in a 2,000 gallon tank is 3.3 psi which is estimated to be 1.6 psia. Based on this information, the rule requires PG&E to install a pressure vacuum relief valve, or internal floating roof, or external floating roof, or vapor recovery system. PG&E has elected to install pressure vacuum relief valve. Thus, compliance is expected with this section. The following condition will be included in the permit:

- *The Reid vapor pressure (RVP) of the organic stored in the tank shall not exceed 3.3 psia. [District Rules 2201 and 4623]*

Note that equip description will state that the tank is equipped with a pressure vacuum relief valve. Therefore, no additional condition is necessary.

Section 5.2 - Specifications for Pressure-Vacuum Relief Valve

The pressure-vacuum relief valve shall be set to within 10 percent of the maximum allowable working pressure of the tank. The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings. The pressure-vacuum relief valve shall be properly installed and maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve set pressure.

The following condition will be included in the permit:

- *The pressure-vacuum relief valve shall be set to within 10 percent of the maximum allowable working pressure of the tank. The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings. The pressure-vacuum relief valve shall be properly installed and maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free*

*condition except when the operating pressure exceeds the valve set pressure.
[District Rule 4623]*

Section 6.2, Administrative Requirements: TVP and API Gravity Testing of Stored Organic Liquid in Uncontrolled Fixed Roof Tanks

Section 6.2.1.1 states that an operator shall conduct an initial TVP testing of each uncontrolled fixed roof tank.

Section 6.2.2.2 states that the TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. If the tank stores crude oil or petroleum distillates, the operator shall also conduct an API gravity testing.

Section 6.2.2 requires an operator to conduct a TVP testing of each uncontrolled fixed roof tank at least once every 24 months during summer (July – September), and/or whenever there is a change in the source or type of organic liquid stored in each tank. The operator shall submit the records of TVP and/or API gravity testing to the APCO as specified in Section 6.3.6.

The following conditions will be included in the permit:

- *The owner or operator shall determine TVP within 60 days of initial startup and at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in the tank. The records of TVP testing shall be submitted within 45 days after the date of testing. The records shall include the tank identification number, permit number, type of stored organic liquid, TVP of the stored organic liquid, test methods used, and a copy of the test results. [District Rule 4623]*
- *TVP shall be determined at actual storage temperature of the organic liquid in the tank. [District Rule 4623]*

Section 6.3, Administrative Requirements: Recordkeeping

Section 6.3.1 requires an operator to keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity (crude oil or petroleum distillate) for a period of at least five years. The following conditions will be included in the permit:

- *The owner or operator shall keep records of the date, name of the organic liquid stored, organic liquid RVP, TVP and its storage temperature. [District Rules 2201 and 4623]*
- *All records shall be retained for a minimum of five years and shall be made available to the District, ARB, or EPA during normal business hours and submitted upon request. [District Rules 2201, 4623 and 4624]*

Section 6.4, Administrative Requirements: Test Methods

Section 6.4.3 states that the TVP of any organic liquid shall be determined by measuring the Reid Vapor Pressure (RVP) using ASTM D 323-94 (Test Method for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B. Appendix B is an excerpt from the oil and gas section of "ARB Technical Guidance Document to the Criteria and Guidelines Regulation for AB 2588", dated August 1989.

The following condition will be included in the permit:

- *TVP of the organic liquid shall be determined by measuring the RVP using ASTM D 323-94 (Test Method for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B. Appendix B is an excerpt from the oil and gas section of "ARB Technical Guidance Document to the Criteria and Guidelines Regulation for AB 2588", dated August 1989. Should the permittee want to use different methodology, then that methodology should be first approved by the District and or the EPA. [District Rules 2201 and 4623]*

Section 7.1, Compliance Schedule

Section 7.1 states that any tank subject to the requirements of this rule that is installed or constructed on and after May 19, 2005, shall be in full compliance with this rule upon initial operation, and thereafter.

The proposed tank is expected to be operated in full compliance with this rule upon initial operation and thereafter.

Compliance is expected with this section.

Rule 4624 Transfer of Organic Liquid

Section 4.1 of this rule states that the requirements of Section 5.0 of this rule shall not apply to organic liquid transfer facilities which transfer less than 4,000 gallons of organic liquids in any one day. The operator shall meet the applicable recordkeeping requirements of Section 6.1.1.

Section 6.1.1 states that an operator claiming exemption under Section 4.1 shall keep records of daily liquid throughput.

PG&E will be limited to transfer 2,000 gal/day of liquid condensate into a tanker truck. They will be required to keep record of daily loadout rate. The following conditions will be included in the permit:

- *The organic liquid loading into tanker truck(s) shall not exceed any of the following limits: 2,000 gallons/day and 16,000 gallons/yr (12-month rolling basis). [District Rules 2201 and 4624]*
- *The owner or operator shall keep records of: a.) date, b.) amount of organic liquid loaded into a tanker truck (gallons/day), c.) amount of organic liquid loaded into a tanker truck (gallons/month), and d.) cumulative total amount of organic liquid loaded into a tanker truck in a consecutive 12-month rolling period. [District Rules 2201 and 4624]*

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (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 San Joaquin Valley Unified Air Pollution Control District (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.
- 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 the proposed changes did not trigger Best Available Control Technology (BACT) requirements. Furthermore, the District concludes that potential health impacts are less than significant from the proposed changes. Therefore, this project does not require discretionary judgment or deliberation. Consequently, this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts CEQA for those projects over which a public agency exercises only ministerial approval; therefore, the District finds that this project to be exempt from the provisions of CEQA.

IX. RECOMMENDATION

Compliance with all applicable rules and regulations is expected. Pending a successful COC Noticing period, issue ATC N-608-33-0 subject to the permit conditions on the attached draft ATC in **Attachment V**.

X. BILLING INFORMATION

Permit #	Fee Schedule	Fee Description	Previous Fee Schedule
N-608-33-0	3020-05 A	2,000 gal	None

Attachments

- Attachment I: TVP and EPA Tanks 4.0 Calculations
- Attachment II: Emissions Profile
- Attachment III: Title V Compliance Certification Form
- Attachment IV: HRA
- Attachment V: Draft ATC

Attachment I

TVP and EPA Tanks 4.0 Calculations

INPUT
 REID VAPOR PRESSURE (psia) 3.30
 TEMPERATURE 61.57

CALCULATED FROM ABOVE INPUT
 TVP 1.68

TVP CALCULATED USING AB2588 METHOD IF RVP IS LESS THAN 2 PSIA	TVP CALCULATED USING EPA METHOD AT AN RVP OF 2 PSIA	LESSER OF TVP (AB2588) AND TVP (EPA AT 2 PSIA)
N/A	0.849	0.849

FOR EPA TVP CALCS ABOVE
 A CONSTANT 12.150
 B CONSTANT 6418.133

pV = R*T	
pressure (p)	1 atm
universal gas constant (R*)	0.7302 atm-scf/lbmole-or
temperature (oF)	60 oF
calculated	
molar specific volume (V)	379.5
CRUDE OIL VAPOR PRESS. CONSTANT A	11.665
CRUDE OIL VAPOR PRESS. CONSTANT B	#####

TANKS 4.0.9d Emissions Report - Summary Format Tank Identification and Physical Characteristics

Identification

User Identification: N-608-33-0
 City: Holt
 State: California
 Company: Pacific Gas & Electric Company
 Type of Tank: Vertical Fixed Roof Tank
 Description: 2,000 above ground storage tank (D-1A)

Tank Dimensions

Shell Height (ft): 4.00
 Diameter (ft): 9.60
 Liquid Height (ft) : 4.00
 Avg. Liquid Height (ft): 2.00
 Volume (gallons): 2,165.84
 Turnovers: 7.39
 Net Throughput(gal/yr): 16,000.00
 Is Tank Heated (y/n): N

Paint Characteristics

Shell Color/Shade: White/White
 Shell Condition: Good
 Roof Color/Shade: White/White
 Roof Condition: Good

Roof Characteristics

Type: Cone
 Height (ft) 0.00
 Slope (ft/ft) (Cone Roof) 0.00

Breather Vent Settings

Vacuum Settings (psig): -0.31
 Pressure Settings (psig) 0.90

Meteorological Data used in Emissions Calculations: Stockton, California (Avg Atmospheric Pressure = 14.72 psia)

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

N-608-33-0 - Vertical Fixed Roof Tank
Holt, California

Mixture/Component	Month			Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
	Avg.	Min.	Max.	Avg.	Min.	Max.		Avg.	Min.	Max.					
Pipeline Liquid	72.25	63.02	81.48	2.1046	1.7355	2.5354	61.57	2.1046	1.7355	2.5354	50.0000			207.00	Option 4; RVP=3.3

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: July

N-608-33-0 - Vertical Fixed Roof Tank
Holt, California

		Losses (lbs)	
Components	Working Loss	Breathing Loss	Total Emissions
Pipeline Liquid	30.07	2.48	32.55

TANKS 4.0.9d Emissions Report - Summary Format Tank Identification and Physical Characteristics

Identification
 User Identification: N-608-33-0
 City: Holt
 State: California
 Company: Pacific Gas & Electric Company
 Type of Tank: Vertical Fixed Roof Tank
 Description: 2,000 above ground storage tank (D-1A)

Tank Dimensions
 Shell Height (ft): 4.00
 Diameter (ft): 9.60
 Liquid Height (ft): 4.00
 Avg. Liquid Height (ft): 2.00
 Volume (gallons): 2,165.84
 Turnovers: 7.39
 Net Throughput(gal/yr): 16,000.00
 Is Tank Heated (y/n): N

Paint Characteristics
 Shell Color/Shade: White/White
 Shell Condition: Good
 Roof Color/Shade: White/White
 Roof Condition: Good

Roof Characteristics
 Type: Cone
 Height (ft): 0.00
 Slope (ft/ft) (Cone Roof): 0.00

Breather Vent Settings
 Vacuum Settings (psig): -0.31
 Pressure Settings (psig): 0.90

Meteorological Data used in Emissions Calculations: Stockton, California (Avg Atmospheric Pressure = 14.72 psia)

TANKS 4.0.9d
Emissions Report - Summary Format
Liquid Contents of Storage Tank

N-608-33-0 - Vertical Fixed Roof Tank
Holt, California

Mixture/Component	Daily Liquid Surf. Temperature (deg F)		Liquid Bulk Temp (deg F)	Vapor Pressure (psia)		Vapor Mol. Weight	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
	Month	Avg.		Min.	Max.					
Pipeline Liquid	All	63.76	57.19	70.34	1.7630	1.5309	2.0231	50.0000	207.00	Option 4; RVP=3.3

TANKS 4.0.9d
Emissions Report - Summary Format
Individual Tank Emission Totals

Emissions Report for: Annual

N-608-33-0 - Vertical Fixed Roof Tank
Holt, California

		Losses (lbs)	
Components	Working Loss	Breathing Loss	Total Emissions
Pipeline Liquid	25.19	0.00	25.19

Attachment II

Emissions Profile

Permit #: N-608-33-0	Last Updated
Facility: PACIFIC GAS & ELECTRIC CO.	01/21/2016 EDGEHILR

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	1237.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	7.1
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	15.0
Q2:	0.0	0.0	0.0	0.0	15.0
Q3:	0.0	0.0	0.0	0.0	16.0
Q4:	0.0	0.0	0.0	0.0	16.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Attachment III

Title V Compliance Certification Form



**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: Pacific Gas & Electric Company	FACILITY ID: N= 608
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: Pacific Gas & Electric Company	
3. Agent to the Owner: Diana MW Furman	

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:

Rolando I. Trevino

Signature of Responsible Official

11/24/2015

Date

Rolando I. Trevino

Name of Responsible Official (please print)

Vice President, Engineering & Design, Gas Operations

Title of Responsible Official (please print)

Attachment IV

HRA

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Jag Kahlon – Permit Services
 From: Kyle Melching – Technical Services
 Date: December 22, 2015
 Facility Name: PG&E
 Location: McDonald Island, Holt
 Application #(s): N-608-33-0
 Project #: N-1153488

A. RMR SUMMARY

Categories	NG Condensate (Unit 33-0)	Project Totals	Facility Totals
Prioritization Score	0.08	0.08	>1
Acute Hazard Index	0.19	0.19	0.8
Chronic Hazard Index	0.00	0.00	0.00
Maximum Individual Cancer Risk (10 ⁻⁶)	0.00	0.00	8.21
T-BACT Required?	No		
Special Permit Conditions?	No		

B. RMR REPORT

I. Project Description

Technical Services received a request on December 22, 2015, to perform a Risk Management Review for the installation of a natural gas condensate liquid pipeline. The collected liquid will be stored in a 2,000 gallon aboveground storage tank. It will then be loaded into a tanker truck for processing at an offsite facility.

II. Analysis

Technical Services performed a prioritization using the District's HEARTs database. Emissions were calculated using "Natural Gas and Propane Fugitives.xls". In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905, March 2, 2001), risks from the proposed unit's toxic emissions were prioritized using the procedure in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEARTs database. The prioritization score for the facility was greater than 1.0 (see RMR Summary Table). Therefore, a refined analysis was required and performed. AERMOD was used, with the parameters outlined below and concatenated meteorological data for Stockton 2009 to 2013 to determine the maximum dispersion factor at the nearest residential and business receptors. These dispersion factors were input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP) and the Air

Dispersion Modeling and Risk Tool (ADMRT) of the Hot Spots Analysis and Reporting Program Version 2 (HARP 2) to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Analysis Parameter Unit 32-0 Tank			
Closest Receptor - Business (m)	309	Closest Receptor – Resident (m)	1024
NG VOC Emissions (lbs/hr)	0.008	NG VOC Emissions (lbs/yr)	25
Stack Height (m)	3	Stack diameter (m)	0.152
Temperature	Ambient	Gas Exit Velocity (m/sec)	0.001

Analysis Parameter Unit 32-0 Truck Loadout Emissions			
Closest Receptor - Business (m)	309	Closest Receptor – Resident (m)	1024
NG VOC Emissions (lbs/hr)	1.8	NG VOC Emissions (lbs/yr)	14
Length (m)	5	Width (m)	16
Release Height (m)	3.8		

Analysis Parameter Unit 32-0 Truck Connect/Disconnect			
Closest Receptor - Business (m)	309	Closest Receptor – Resident (m)	1024
NG VOC Emissions (lbs/hr)	0.04	NG VOC Emissions (lbs/yr)	1
Area Source Radius (m)	1.2	Release Height	0

III. Conclusion

The acute and chronic hazard indices were below 1.0; and the cancer risk is less than or equal to 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).**

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**

Attachment V

Draft ATC

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-608-33-0

LEGAL OWNER OR OPERATOR: PACIFIC GAS & ELECTRIC CO.
MAILING ADDRESS: ATTN: AIR QUALITY PERMITS
P O BOX 7640
SAN FRANCISCO, CA 94120

LOCATION: MCDONALD ISLAND COMPRESSOR STATION
HOLT, CA 95234

EQUIPMENT DESCRIPTION:

PIPELINE LIQUID TRANSFER, STORAGE, AND LOADOUT OPERATION CONSISTING OF A 2,000 GALLON CONVAULT ABOVEGROUND FIXED ROOF STORAGE TANK (D-1A) EQUIPPED WITH A PRESSURE VACUUM RELIEF VALVE, AND TANKER TRUCK LOADOUT EQUIPMENT

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. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Tank breather vent setting shall be -0.31 in H₂O vacuum and +0.90 in H₂O. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The Reid vapor pressure (RVP) of the organic stored in the tank shall not exceed 3.3 psia. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
6. The organic liquid transfer into the tank shall not exceed any of the following limits: 900 gallons/day and 16,000 gallons/year (12-month rolling basis). [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC emissions from transferring and storage of organic liquid in the tank shall not any of the following limits: 1.8 lb/day and 25 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

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 Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

N-608-33-0: Jan 21 2016 11:16AM - EDGEHLR : Joint Inspection NOT Required

8. The owner or operator shall determine TVP within 60 days of initial startup and at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in the tank. The records of TVP testing shall be submitted within 45 days after the date of testing. The records shall include the tank identification number, permit number, type of stored organic liquid, TVP of the stored organic liquid, test methods used, and a copy of the test results. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
9. TVP shall be determined at actual storage temperature of the organic liquid in the tank. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
10. TVP of the organic liquid shall be determined by measuring the RVP using ASTM D 323-94 (Test Method for Vapor Pressure for Petroleum Products), and converting the RVP to TVP at the tank's maximum organic liquid storage temperature. The conversion of RVP to TVP shall be done in accordance with the procedures in Appendix B. Appendix B is an excerpt from the oil and gas section of "ARB Technical Guidance Document to the Criteria and Guidelines Regulation for AB 2588", dated August 1989. Should the permittee want to use different methodology, then that methodology should be first approved by the District and or the EPA. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. The pressure-vacuum relief valve shall be set to within 10 percent of the maximum allowable working pressure of the tank. The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings. The pressure-vacuum relief valve shall be properly installed and maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
12. VOC emissions from tanker truck loading operation shall not exceed 1.0 lb/1,000 gallons of pipeline condensate liquid loaded. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The organic liquid loading into tanker truck(s) shall not exceed any of the following limits: 2,000 gallons/day and 16,000 gallons/yr (12-month rolling basis). [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
14. The organic liquid drainage from disconnections associated with the tanker truck loadout equipment shall not exceed 10 mL per disconnect. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The total number of disconnects shall not exceed any of the following limits: 3 disconnects/day and 24 disconnects/year (12-month rolling basis). [District Rule 2201] Federally Enforceable Through Title V Permit
16. The operator shall determine an average organic liquid drainage for three consecutive disconnects to demonstrate compliance with the permitted organic liquid drainage limit of 10 mL per disconnect. The drainage shall be determined within 60 days of initial startup of the tanker truck transfer operation and the associated records shall be submitted within 45 days after the testing. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Fugitive VOC emissions from components (i.e., valves and connectors located within 60 feet of piping to the D-1A tank used to route the organic liquid into the tank) shall not exceed any of the following limits: 3.3 lb/day and 1,175 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Fugitive VOC emissions shall be calculated using the EPA "Protocol for Equipment Leak Emissions Estimates (EPA-453/R-95-017 (November 1995), Table 2-1, Synthetic Organic Chemical Manufacturing Industry (SOCMI) Average Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Except as otherwise provided in this permit, all piping, valves, and fittings under this permit shall be constructed and maintained in a leak-free condition. Leak free condition is defined as a condition without a gas leak or a liquid leak. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
20. A leak-free condition is 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 that is calibrated with methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A gas leak or a liquid leak is a violation of this permit and Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

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21. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
22. If any of the tank components are found to be leaking, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
23. Upon detection of any leaking components (having a gas leak >10,000 ppmv, measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane) operator shall: (a) eliminate or minimize the leak within 8 hours after detection, (b) if the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices and eliminate the leak within 48 hours after detection. In no event shall the total time to minimize and eliminate the leak exceed 56 hours after detection. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
24. Leaking tank components affixed to the tank or within five feet of the tank that have been discovered by the operator and that have been immediately tagged and repaired within the specified deadlines, shall not constitute a violation of the District Rule 4623. However, leaking components discovered during inspections by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within specified deadlines, shall constitute a violation of SJVUAPCD Rule 4623. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
25. If a component type is found to leak during an annual inspection, then conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If a component type is found to have no leak after four consecutive quarterly inspections, then revert to annual inspections. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
26. Any component affixed to the tank or within 5 feet of the tank that is found to be leaking on two consecutive annual inspections is in violation of SJVUAPCD Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
27. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020] Federally Enforceable Through Title V Permit
28. Permittee shall comply with all applicable Tank Interior Cleaning Program requirements specified in Table 3 of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
29. All components greater than 5 feet from the tank and within 60 ft of the D-1A tank equipment that are found leaking shall be tagged and repaired or replaced within 72 hours of detection. The repaired or replaced equipment must be re-inspected. [District Rule 2201] Federally Enforceable Through Title V Permit
30. For the components covered under this permit, the owner or operator shall keep records of the type of component, number of components, emission factors, total daily (lb/day) and annual VOC emissions (lb/year). [District Rule 2201] Federally Enforceable Through Title V Permit
31. For each component inspected, the owner or operator shall keep records of the date, name of component, its location, measured ppmv value, the name of the operator and the company conducting the leak inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
32. The owner or operator shall keep records of the date, name of the organic liquid stored in tank D-1A, organic liquid RVP, TVP and storage temperature when RVP/TPV samples are taken. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
33. The owner or operator shall keep records of: a.) date, b.) amount of organic liquid transferred into the tank D-1A (gallons/day), c.) amount of organic liquid transferred into the tank D-1A (gallons/month), and d.) cumulative total amount of organic liquid transferred into the tank in a consecutive 12-month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit
34. The owner or operator shall keep records of: a.) date, b.) number of disconnects (disconnects/day), c.) number of disconnects (gallons/month), and d.) cumulative total number of disconnects in a consecutive 12-month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit

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35. The owner or operator shall keep records of: a.) date, b.) amount of organic liquid loaded into a tanker truck (gallons/day), c.) amount of organic liquid loaded into a tanker truck (gallons/month), and d.) cumulative total amount of organic liquid loaded into a tanker truck in a consecutive 12-month rolling period. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
36. 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 8 hours after detection. [District Rule 1070] Federally Enforceable Through Title V Permit
37. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623] Federally Enforceable Through Title V Permit
38. All records shall be retained for a minimum of five years and shall be made available to the District, ARB, or EPA during normal business hours and submitted upon request. [District Rules 2201, 4623 and 4624] Federally Enforceable Through Title V Permit

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