



OCT 09 2013

Mr. Tommy Coffey
Plains LPG Services, LP
19430 Beech Ave
Shafter, CA 93263

Re: Notice of Minor Title V Permit Modification
District Facility # S-71
Project # 1133764

Dear Mr. Coffey:

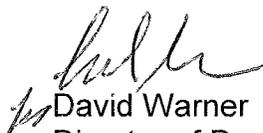
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued ATCs S-71-2-10, '4-14, '12-7, '14-11 and '15-9 into the Title V operating permit. The ATCs authorized removal of fugitive VOC components for four permits units and addition of fugitive VOC components at a loading rack including a new compressor and two 40 hp electrically powered pumps replacing two 20 hp electrically powered pumps.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATCs S-71-2-10, '4-14, '12-7, '14-11 and '15-9, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1133764

Engineer: David Torii
Reviewing Engineer: Allan Phillips *AP sure AQE*
Date: 10/2/13 *OCT 08 2013*

Facility Number: S-71
Facility Name: Plains LPG Services, LP
Mailing Address: 19430 Beech Ave
Shafter, CA 93263

Contact Name: Tommy Coffey
Phone: 661-589-5377

Responsible Official: Tommy Coffey
Title: Manager

I. PROPOSAL

Plains LPG Services, LP (Plains) received their initial Title V permit on 10/31/12. The subject project 1104298 ATCs were issued on 10/11/10 without consideration of Title V requirements. Therefore, Plains is proposing a Title V minor permit modification to incorporate the project 1104298 ATCs 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 the proposed revisions.

II. FACILITY LOCATION

This facility is located at 7th Standard and Beech Ave in Shafter, California.

III. EQUIPMENT DESCRIPTION (see Current PTOs in Attachment B and ATCs in Attachment B)

PTO S-71-2-11: NATURAL GASOLINE AND LPG LOADING AND UNLOADING OPERATION WITH VAPOR CONTROL, TWO NATURAL GASOLINE AND LPG LOADING/UNLOADING RACKS, TWO LPG LOADING/UNLOADING RACKS, THREE 20,850 GALLON PRESSURIZED STORAGE TANKS, TWO 25 HP COMPRESSORS, PIPING TO PRESSURIZED (PERMIT EXEMPT) LPG TANKS, AND NITROGEN PURGE SYSTEM FOR LIQUID LINES, COMPRESSOR SEALS, AND COMPRESSOR CRANKCASES

ATC S-71-2-10: MODIFICATION OF NATURAL GASOLINE AND LPG LOADING AND UNLOADING OPERATION WITH VAPOR CONTROL, TWO NATURAL GASOLINE AND LPG LOADING/UNLOADING RACKS, TWO LPG LOADING/UNLOADING RACKS, THREE 20,850 GALLON PRESSURIZED STORAGE TANKS, TWO 25 HP COMPRESSORS, PIPING TO PRESSURIZED (PERMIT EXEMPT) LPG TANKS, AND NITROGEN PURGE SYSTEM FOR LIQUID LINES, COMPRESSOR SEALS, AND COMPRESSOR CRANKCASES: DECREASE FUGITIVE VOC COMPONENT COUNT

- PTO S-71-4-15: BUTAMER-BUTANE ISOMERIZATION UNIT INCLUDING TWO BUTANE FEED DRYERS V-102A/B, HYDROGEN MAKE-UP DRYER V-106, TWO REGENERANT DRYERS V-107A/B, ONE 80 MMBTU/HR GAS-FIRED PROCESS OIL HEATER H-201 WITH SIX MODEL CUBR-10W LOW-NOX BURNERS AND FUEL PIPING SHARED WITH PERMIT #S-71-1
- ATC S-71-4-14: MODIFICATION OF BUTAMER-BUTANE ISOMERIZATION UNIT INCLUDING TWO BUTANE FEED DRYERS V-102A/B, HYDROGEN MAKE-UP DRYER V-106, TWO REGENERANT DRYERS V-107A/B, ONE 80 MMBTU/HR GAS-FIRED PROCESS OIL HEATER H-201 WITH SIX MODEL CUBR-10W LOW-NOX BURNERS AND FUEL PIPING SHARED WITH PERMIT #S-71-1: DECREASE FUGITIVE VOC COMPONENT COUNT
- PTO S-71-12-8: RAILCAR LPG/NATURAL GASOLINE LOADING/UNLOADING OPERATION WITH FIFTEEN LPG/NATURAL GASOLINE LOADING/UNLOADING STATIONS INCLUDING: ELEVATED RACK SYSTEM UTILIZING HARD PIPING AND SWIVEL JOINTS; AND NITROGEN PURGE SYSTEM SERVING LIQUID LINES, COMPRESSOR SEALS, AND COMPRESSOR CRANKCASES
- ATC S-71-12-7: MODIFICATION OF RAILCAR LPG/NATURAL GASOLINE LOADING/UNLOADING OPERATION WITH FIFTEEN LPG/NATURAL GASOLINE LOADING/UNLOADING STATIONS INCLUDING: ELEVATED RACK SYSTEM UTILIZING HARD PIPING AND SWIVEL JOINTS; AND NITROGEN PURGE SYSTEM SERVING LIQUID LINES, COMPRESSOR SEALS, AND COMPRESSOR CRANKCASES: INCREASE FUGITIVE VOC COMPONENT COUNT, ADD COMPRESSOR AND REPLACE TWO 20 HP PUMPS WITH TWO 40 HP PUMPS
- PTO S-71-14-12: BUTAMER-BUTANE ISOMERIZATION UNIT #2 WITH 105 MMBTU/HR GAS-FIRED HOT OIL HEATER H-202 EQUIPPED WITH CALLIDUS MODEL CUBR-12W LOW-NOX BURNERS AND INTERNAL FGR, WITH NITROGEN PURGE SYSTEM SERVING COMPRESSOR SEALS AND COMPRESSOR CRANKCASES
- ATC S-71-14-11: MODIFICATION OF BUTAMER-BUTANE ISOMERIZATION UNIT #2 WITH 105 MMBTU/HR GAS-FIRED HOT OIL HEATER H-202 EQUIPPED WITH CALLIDUS MODEL CUBR-12W LOW-NOX BURNERS AND INTERNAL FGR, WITH NITROGEN PURGE SYSTEM SERVING COMPRESSOR SEALS AND COMPRESSOR CRANKCASES: DECREASE FUGITIVE VOC COMPONENT COUNT
- PTO S-71-15-10: SAFECAT FEEDSTOCK TREATMENT UNIT WITH 23 MMBTU/HR GAS-FIRED HEATER H-401 EQUIPPED WITH CALLIDUS MODEL CUBR-8P LOW-NOX BURNERS AND INTERNAL FGR
- ATC S-71-15-9: MODIFICATION OF SAFECAT FEEDSTOCK TREATMENT UNIT WITH 23 MMBTU/HR GAS-FIRED HEATER H-401 EQUIPPED WITH CALLIDUS MODEL CUBR-8P LOW-NOX BURNERS AND INTERNAL FGR: DECREASE FUGITIVE VOC COMPONENT COUNT

IV. SCOPE OF EPA AND PUBLIC REVIEW

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

V. APPLICABLE REQUIREMENTS

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

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The Changes in the original Permit to Operate and the implemented ATC are as follows:

Proposed PTO S-71-2-12		
Condition #'s on current PTO S-71-2-11 that were removed	New conditions on proposed PTO S-71-2-12	Reason for Change from Current PTO
14-17		Rule 4455 conditions that were incorporated into a comprehensive set of 4455 conditions (#s15-37) on '2-12
	15-36	Rule 4455 conditions added
8	8	DEL condition was revised

Proposed PTO S-71-4-16		
Condition #'s on current PTO S-71-4-15 that were removed	New conditions on proposed PTO S-71-4-16	Reason for Change from Current PTO
21-24		Rule 4455 conditions that were incorporated into a comprehensive set of 4455 conditions (#s21-42) on '4-16
	21-42	Rule 4455 conditions added
17	17	DEL condition was revised
	61-62	Rule 4320 fee pay conditions added

Proposed PTO S-71-12-9		
Condition #'s on current PTO S-71-12-8 that were removed	New/revised conditions on proposed PTO S-71-12-9	Reason for Change from Current PTO
16-19		Rule 4455 conditions that were incorporated into a comprehensive set of 4455 conditions (#s16-37) on '12-9
	16-37	Rule 4455 conditions added
7	7	DEL condition was revised

Proposed PTO S-71-14-13		
Condition #'s on current PTO S-71-14-12 that were removed	New conditions on proposed PTO S-71-14-13	Reason for Change from Current PTO
29-32		Rule 4455 conditions that were incorporated into a comprehensive set of 4455 conditions (#s 29-51) on '14-3
	29-51	Rule 4455 conditions added
12	12	DEL condition was revised
	52-53	Rule 4320 fee pay conditions added

Proposed PTO S-71-15-11		
Condition #'s on current PTO S-71-15-10 that were removed	New conditions on proposed PTO S-71-15-11	Reason for Change from Current PTO
33-36		Rule 4455 conditions that were incorporated into a comprehensive set of 4455 conditions (#s33-54) on '15-11
	33-54	Rule 4455 conditions added
12	12	DEL condition was revised
56-57		Rule 4320 fee pay conditions added

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which

the source would otherwise be subject. Such terms and conditions include;

- a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
- b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

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

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

ATTACHMENT A

Proposed Modified Title V Operating Permits

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-71-2-12

EXPIRATION DATE: 08/31/2017

SECTION: SW35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

NATURAL GASOLINE AND LPG LOADING AND UNLOADING OPERATION WITH VAPOR CONTROL, TWO NATURAL GASOLINE AND LPG LOADING/UNLOADING RACKS, TWO LPG LOADING/UNLOADING RACKS, THREE 20,850 GALLON PRESSURIZED STORAGE TANKS, TWO 25 HP COMPRESSORS, PIPING TO PRESSURIZED (PERMIT EXEMPT) LPG TANKS, AND NITROGEN PURGE SYSTEM FOR LIQUID LINES, COMPRESSOR SEALS, AND COMPRESSOR CRANKCASES

PERMIT UNIT REQUIREMENTS

1. The loading racks shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 95%. [District Rule 4624] Federally Enforceable Through Title V Permit
2. Permittee shall comply with all applicable inspection, maintenance, testing, and recordkeeping requirements of Rules 4624 for organic liquid loading operations. [District Rules 4624] Federally Enforceable Through Title V Permit
3. Nitrogen purge system shall be a closed loop system and shall not vent to the atmosphere during operation of the system. [District Rule 2201] Federally Enforceable Through Title V Permit
4. After completion of truck loading/unloading, liquid lines shall be purged with nitrogen prior to disconnection. [District Rule 4624] Federally Enforceable Through Title V Permit
5. The nitrogen purge system serving the compressor seals and compressor crankcases shall vent through two activated charcoal canisters connected in series, except during scheduled maintenance or repair activities. During repair and maintenance (such as charcoal bed change out) VOC emissions shall be minimized to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The nitrogen purge system's used activated charcoal canisters shall be handled and disposed of in sealed containers, preventing VOC emissions to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The nitrogen purge system's activated charcoal canisters shall be replaced to maintain the VOC concentration from the canister vent less than 4,500 ppmv-VOC or periodically as recommended by the manufacturer, whichever occurs first. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fugitive VOC emission rate shall not exceed 32.19 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Maximum VOC emissions from truck loading/unloading liquid hose connects/disconnects shall not exceed 3.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Maximum VOC emissions from truck loading/unloading vapor hose connects/disconnects shall not exceed 0.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
12. There shall be no more than 192 liquid hose connects/disconnects in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. There shall be no more than 192 vapor hose connects/disconnects in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall maintain accurate daily records of the number of truck loading/unloading vapor hose connects/disconnects and truck loading/unloading liquid hose connects/disconnects. [District Rule 1070]
15. The operator shall meet operating, inspection and re-inspection, maintenance, process pressure relief device (PRD) and component identification requirements of District Rule 4455 (4/20/05) for all components containing or contacting VOC, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455, 5.0] Federally Enforceable Through Title V Permit
16. Except as follows, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rules 2201 and 4455] Federally Enforceable Through Title V Permit
17. The operator shall not use any component that leaks in excess of the allowable leak standards, except as follows. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the Rule. [District Rule 4455, 5.1.1] Federally Enforceable Through Title V Permit
18. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2] Federally Enforceable Through Title V Permit
19. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be re-inspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the Rule. [District Rule 4455, 5.2.1 and 5.2.2] Federally Enforceable Through Title V Permit
20. The operator shall inspect all components at least once every calendar quarter. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5 through 5.2.7. Components shall be inspected using EPA Method 21. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6, and 5.2.7] Federally Enforceable Through Title V Permit
21. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs, which shall continue to be inspected on a quarterly basis. [District Rule 4455] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

22. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the Rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this Rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 and 5.2.10] Federally Enforceable Through Title V Permit
23. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11] Federally Enforceable Through Title V Permit
24. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12] Federally Enforceable Through Title V Permit
25. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of this Rule. [District Rule 4455, 5.3.1 and 5.3.2] Federally Enforceable Through Title V Permit
26. The tag shall include date and time of leak detection, date and time of leak measurement, indicate the leak concentration in ppmv (gas leaks), indicate whether it is a major or a minor leak (liquid leaks) and whether the leaking component is an essential component, unsafe-to-monitor component or critical component. [District Rule 4455, 5.3.3] Federally Enforceable Through Title V Permit
27. All component leaks shall be immediately minimized to the extent possible, but not later than one hour after detection of leaks, in order to stop or reduce leakage to the atmosphere. As soon as practicable but not later than the time period specified in Table 3 of the Rule, components that have been identified as leaking and have had emissions minimized to the extent possible but do not meet the applicable leak standards of the Rule shall either be: 1) repaired or replaced, or 2) vented to a closed vent system, or 3) removed from operation. [District Rule 4455, 5.3.5] Federally Enforceable Through Title V Permit
28. For any leaking component that is an essential or critical component, and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized but still exceeds any of the applicable leak standards of this Rule, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6] Federally Enforceable Through Title V Permit
29. For any component that has incurred five repair actions for major gas leaks or major liquid leaks (any combination) within a continuous 12-month period, the operator shall as soon as practicable but not later than 12 months after the date of detection either: 1) replace or retrofit the component with the control technology specified in Table 4 of the rule, or 2) replace the component with Best Available Control Technology (BACT) equipment, as approved by the APCO, or 3) vent the component to an APCO approved closed vent system as defined in Section 3.0 of the Rule, or 4) remove the component from operation. Inaccessible components, unsafe-to-monitor components, essential components, or critical components shall satisfy the above-listed requirement as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes earlier. The APCO shall be notified in writing prior to the replacement or retrofitting of any component. [District Rule 4455, 5.3.7] Federally Enforceable Through Title V Permit
30. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

31. The operator shall comply with the process PRD release notification and record keeping requirements specified in Section 6.3 of the Rule. After a release from process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. [District Rule 4455, 5.4.3 and 5.4.4] Federally Enforceable Through Title V Permit
32. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and record keeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other APCO-approved system that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4455, 5.5] Federally Enforceable Through Title V Permit
33. The operator shall keep a copy of the OMP at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing approved Operator Management Plan. [District Rule 4455, 6.1.2] Federally Enforceable Through Title V Permit
34. Operator shall maintain an inspection log containing the information set forth in Sections 6.2.1.1 through 6.2.1.10 of the Rule. [District Rule 4455, 6.2.1] Federally Enforceable Through Title V Permit
35. The operator shall notify the APCO, by telephone or other APCO-approved methods, of any process PRD release in excess of 500 pounds of VOC in a continuous 24-hour period, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. The operator shall submit a written report to the APCO within thirty calendar days of following notification of process PRD release subject to 6.3.1 of the rule. The written report shall include all of the information set forth in Sections 6.3.2.1 through 6.3.2.5 of the Rule. [District Rule 4455, 6.3] Federally Enforceable Through Title V Permit
36. Measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument, calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. Operator shall keep a record of each instrument calibration in accordance with requirements as set forth Section 6.2.3 of the Rule. [District Rule 4455, 6.4] Federally Enforceable Through Title V Permit
37. The organic liquid loading operation shall be bottom loaded. [District Rule 4624] Federally Enforceable Through Title V Permit
38. The VOCs from the organic liquid transfer operation shall be routed to: a vapor collection and control system; or a fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a floating roof container that meets the control requirements in Rule 4623; or a pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements specified in Rule 4623; or a closed VOC emission control system. [District Rule 4624] Federally Enforceable Through Title V Permit
39. When utilizing a closed VOC emission control system or utilizing a container that meets the control requirements of Rule 4623 (Storage of Organic Liquids) to meet the emission control requirements of this permit, the transfer operation shall demonstrate compliance by complying with the leak inspection requirements of Rule 4624. [District 4624] Federally Enforceable Through Title V Permit
40. The vapor collection and control system, except when transferring liquefied petroleum gas, shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum [District Rule 4624] Federally Enforceable Through Title V Permit
41. For this Class 1 organic liquid transfer operation, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District 4624] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

42. The maximum liquid spillage/leaks from each hose disconnect shall not exceed 10 milliliters. [District Rule 4624] Federally Enforceable Through Title V Permit
43. Transfer rack shall be maintained and operated in accordance with the manufacturer's specifications, and operated such that there are no leaks or excess organic liquid drainage at disconnections as defined in Rule 4624. [District Rule 4624] Federally Enforceable Through Title V Permit
44. Except for components subject to Rule 4455, a leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute; or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above a background as methane when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from equipment into a container is not considered a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere [District Rule 4624] Federally Enforceable Through Title V Permit
45. Except for components subject to Rule 4455, permittee shall inspect the loading rack for leaks during transfer at least once every calendar quarter using a portable hydrocarbon detection instrument in accordance with EPA Method 21 or alternative method approved in writing by the APCO and EPA. [District Rule 4624] Federally Enforceable Through Title V Permit
46. Except for components subject to Rule 4455, all equipment found leaking shall be repaired or replaced within 72 hours. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replaced equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624] Federally Enforceable Through Title V Permit
47. Except for components subject to Rule 4455, an operator may apply for a written approval from the APCO to change the inspection frequency required by Rule 4624 from quarterly to annually provided no leaks were found during inspections required under provisions of Sections 5.9.1 and 5.9.2 of Rule 4624 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency shall revert back to quarterly and the operator shall contact the APCO in writing within 14 days. [District 4624] Federally Enforceable Through Title V Permit
48. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-71-4-16

EXPIRATION DATE: 08/31/2017

SECTION: 35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

BUTAMER-BUTANE ISOMERIZATION UNIT INCLUDING TWO BUTANE FEED DRYERS V-102A/B, HYDROGEN MAKE-UP DRYER V-106, TWO REGENERANT DRYERS V-107A/B, ONE 80 MMBTU/HR GAS-FIRED PROCESS OIL HEATER H-201 WITH SIX MODEL CUBR-10W LOW-NOX BURNERS AND FUEL PIPING SHARED WITH PERMIT #S-71-1

PERMIT UNIT REQUIREMENTS

1. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operation shall include feed surge drum V-103, one product separator V-104, two reactors R-101A/B, stabilizer receiver V-109, and one perchloroethylene storage/injection vessel V-105. [District Rules 2201 & 4102] Federally Enforceable Through Title V Permit
3. Operation shall include one spent caustic de-gas drum V-112, one stabilizer column V-108, and one net gas scrubber V-110. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operation shall include one de-isobutanizer tower T-201, one de-isobutanizer overhead accumulator V-201, one 125 HP recycle gas compressor C-101, and one hydrogen make-up knock-out drum V-115. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operation shall include hot oil circulation piping, exchangers, and miscellaneous vessels. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Hot oil drum shall be equipped with a pressure relief valve set at a minimum 100 psig and no greater than maximum pressure rating recommended by ASME or other recognized authority. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All VOC sampling connections, open-ended valves, and lines shall be equipped with two closed valves or be sealed with blind flanges, caps, or threaded plugs except during actual use. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Perchloroethylene storage vessel shall be blanketed with inert gas. [District Rule 4102]
9. Perchloroethylene storage vessel shall be equipped with a pressure relief valve set at a minimum pressure of 50 psig. [District Rule 4102]
10. Hot oil drum shall be fuel gas blanketed with vent to fuel gas system. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Fuel gas combusted in fired equipment may be comprised of process off-gas (including hydrogen), propane, butane, natural gas, or any combination thereof. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The heating value of the fuel gas (Btu/scf @ hhv) combusted in fired equipment shall be determined by sample analysis at least annually. Results of sample analysis shall be retained on site and made available for District inspection upon request. [District Rule 2201] 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.

13. Total heat input of fuel gas combusted in units S-71-4, '5, '14 and '15 shall not exceed 1,602,019 MM Btu/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Perchloroethylene receiving line shall be blown dry to storage vessel using an inert gas upon completion of transfer. [District Rule 4102]
15. Only heat transfer fluid manufactured and marketed for such use shall be used in a closed loop as heat transfer medium. [District Rule 2201] Federally Enforceable Through Title V Permit
16. All excess gas shall be incinerated in process heater firebox or existing boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Fugitive VOC emission rate shall not exceed 46.40 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Emission rates shall not exceed any of the following: PM10: 0.005 lb/MMBtu; NOx (as NO2): 25 ppmv @ 3% O2; VOC: 0.00275 lb/MMBtu; SOx (as SO2): 0.0005 lb/MMBtu; or CO: 50 ppmv @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Hot oil heater stack shall be equipped with sampling facilities for source testing in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 2201] Federally Enforceable Through Title V Permit
21. The operator shall meet operating, inspection and re-inspection, maintenance, process pressure relief device (PRD) and component identification requirements of District Rule 4455 (4/20/05) for all components containing or contacting VOC, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455, 5.0] Federally Enforceable Through Title V Permit
22. Except as follows, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rules 2201 and 4455] Federally Enforceable Through Title V Permit
23. The operator shall not use any component that leaks in excess of the allowable leak standards, except as follows. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the Rule. [District Rule 4455, 5.1.1] Federally Enforceable Through Title V Permit
24. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2] Federally Enforceable Through Title V Permit
25. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be re-inspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the Rule. [District Rule 4455, 5.2.1 and 5.2.2] Federally Enforceable Through Title V Permit
26. The operator shall inspect all components at least once every calendar quarter. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5 through 5.2.7. Components shall be inspected using EPA Method 21. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6, and 5.2.7] 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.

27. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs, which shall continue to be inspected on a quarterly basis. [District Rule 4455] Federally Enforceable Through Title V Permit
28. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the Rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this Rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 and 5.2.10] Federally Enforceable Through Title V Permit
29. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11] Federally Enforceable Through Title V Permit
30. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12] Federally Enforceable Through Title V Permit
31. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of this Rule. [District Rule 4455, 5.3.1 and 5.3.2] Federally Enforceable Through Title V Permit
32. The tag shall include date and time of leak detection, date and time of leak measurement, indicate the leak concentration in ppmv (gas leaks), indicate whether it is a major or a minor leak (liquid leaks) and whether the leaking component is an essential component, unsafe-to-monitor component or critical component. [District Rule 4455, 5.3.3] Federally Enforceable Through Title V Permit
33. All component leaks shall be immediately minimized to the extent possible, but not later than one hour after detection of leaks, in order to stop or reduce leakage to the atmosphere. As soon as practicable but not later than the time period specified in Table 3 of the Rule, components that have been identified as leaking and have had emissions minimized to the extent possible but do not meet the applicable leak standards of the Rule shall either be: 1) repaired or replaced, or 2) vented to a closed vent system, or 3) removed from operation. [District Rule 4455, 5.3.5] Federally Enforceable Through Title V Permit
34. For any leaking component that is an essential or critical component, and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized but still exceeds any of the applicable leak standards of this Rule, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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35. For any component that has incurred five repair actions for major gas leaks or major liquid leaks (any combination) within a continuous 12-month period, the operator shall as soon as practicable but not later than 12 months after the date of detection either: 1) replace or retrofit the component with the control technology specified in Table 4 of the rule, or 2) replace the component with Best Available Control Technology (BACT) equipment, as approved by the APCO, or 3) vent the component to an APCO approved closed vent system as defined in Section 3.0 of the Rule, or 4) remove the component from operation. Inaccessible components, unsafe-to-monitor components, essential components, or critical components shall satisfy the above-listed requirement as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes earlier. The APCO shall be notified in writing prior to the replacement or retrofitting of any component. [District Rule 4455, 5.3.7] Federally Enforceable Through Title V Permit
36. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1] Federally Enforceable Through Title V Permit
37. The operator shall comply with the process PRD release notification and record keeping requirements specified in Section 6.3 of the Rule. After a release from process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. [District Rule 4455, 5.4.3 and 5.4.4] Federally Enforceable Through Title V Permit
38. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and record keeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other APCO-approved system that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4455, 5.5] Federally Enforceable Through Title V Permit
39. The operator shall keep a copy of the OMP at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing approved Operator Management Plan. [District Rule 4455, 6.1.2] Federally Enforceable Through Title V Permit
40. Operator shall maintain an inspection log containing the information set forth in Sections 6.2.1.1 through 6.2.1.10 of the Rule. [District Rule 4455, 6.2.1] Federally Enforceable Through Title V Permit
41. The operator shall notify the APCO, by telephone or other APCO-approved methods, of any process PRD release in excess of 500 pounds of VOC in a continuous 24-hour period, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. The operator shall submit a written report to the APCO within thirty calendar days of following notification of process PRD release subject to 6.3.1 of the rule. The written report shall include all of the information set forth in Sections 6.3.2.1 through 6.3.2.5 of the Rule. [District Rule 4455, 6.3] Federally Enforceable Through Title V Permit
42. Measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument, calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. Operator shall keep a record of each instrument calibration in accordance with requirements as set forth Section 6.2.3 of the Rule. [District Rule 4455, 6.4] Federally Enforceable Through Title V Permit
43. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305 & 4306] Federally Enforceable Through Title V Permit
44. The duration of each startup and shutdown period for the 80 MMBtu/hr gas-fired process oil heater shall not exceed 5.5 hours and 2.0 hours respectively. Emission limits of Rules 4305 and 4306 are waived during periods of startup and shutdown. [District Rules 4305 & 4306] 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.

45. The permittee shall maintain records of the duration of each startup period for the 80 MMBtu/hr gas-fired process oil heater. [District Rules 4305 & 4306] Federally Enforceable Through Title V Permit
46. The permittee shall monitor and record the stack concentration of NO_x (as NO₂), CO, and O₂ at least once every month using a portable emission monitor. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
47. If the NO_x and/or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
48. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
49. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
50. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
51. This unit shall be tested for compliance with the NO_x, CO, and SO_x emissions limits at least once every 12 months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
52. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. NO_x emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
53. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. CO emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
54. SO_x emissions for source test purposes shall be determined using EPA Method 19. [District Rule 1081] Federally Enforceable Through Title V Permit
55. Stack gas oxygen for source test purposes shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
56. If permittee fails any compliance demonstration for NO_x, CO, or SO_x emission limits when testing not less than once every 36 months, compliance with NO_x, CO, and SO_x emission limits shall be demonstrated not less than once every 12 months. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
57. Permittee shall maintain accurate records of perchloroethylene usage, fuel gas heating value, and daily, monthly and annual records of fuel gas use. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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58. Permittee shall maintain accurate monthly records of the combined heat input of the fuel gas combusted in units S-71-4, '5, '14 and '15. [Districts Rule 1070 and 2201] Federally Enforceable Through Title V Permit
59. When the LPG supply source for make up fuel to the fuel gas system changes, the stack concentrations of NOx, CO, and O2 shall be measured with a District approved portable analyzer to verify emissions compliance. This is to be done anytime that LPG is being vaporized to supply make up fuel to the fuel gas system. [District Rule 2201, 4301, 4305 and 4306] Federally Enforceable Through Title V Permit
60. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455] Federally Enforceable Through Title V Permit
61. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
62. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-71-12-9

EXPIRATION DATE: 08/31/2017

SECTION: 35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

RAILCAR LPG/NATURAL GASOLINE LOADING/UNLOADING OPERATION WITH FIFTEEN LPG/NATURAL GASOLINE LOADING/UNLOADING STATIONS INCLUDING: ELEVATED RACK SYSTEM UTILIZING HARD PIPING AND SWIVEL JOINTS; AND NITROGEN PURGE SYSTEM SERVING LIQUID LINES, COMPRESSOR SEALS, AND COMPRESSOR CRANKCASES

PERMIT UNIT REQUIREMENTS

1. Operation shall include 15 railcar loading/unloading stations each equipped with two (2) liquid lines and one (1) vapor return line for a total of 45 loading arms with 225 swivel joints. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The nitrogen purge system serving the liquid lines shall be a closed loop system and shall not vent to the atmosphere during operation of the system. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The nitrogen purge system serving the compressor seals and compressor crankcases shall vent through two activated charcoal canisters connected in series, except during scheduled maintenance or repair activities. During repair and maintenance (such as charcoal bed change out) VOC emissions shall be minimized to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The nitrogen purge system's used activated charcoal canisters shall be handled and disposed of in sealed containers, preventing VOC emissions to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The nitrogen purge system's activated charcoal canisters shall be replaced to maintain the VOC concentration from the canister vent less than 4,500 ppmv-VOC or periodically as recommended by the manufacturer, whichever occurs first. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Operation shall include three vapor compressors equipped with knock-out vessels and not exceeding 100 hp each, three compressor knock-out drum pumps, and five turbine pumps. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive VOC emissions from valves, flanges, connectors, pump seals, and other fugitive components associated with this permit unit shall not exceed 71.88 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum VOC emissions from railcar loading/unloading (vapor and liquid losses combined) operation shall not exceed 2.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using "California Implementation Guidelines for estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Oil and Gas Production Operations Screening Value Ranges Emission Factors Table IV-2c Feb 1999. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall comply with all inspection, maintenance, testing, and recordkeeping requirements of Rules 4624 for the organic liquid loading operation. [District Rule 4624] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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11. The loading racks shall be equipped with a vapor return system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 95%. [District Rule 2201] Federally Enforceable Through Title V Permit
12. There shall be no more than 120 liquid hose connects/disconnects in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. There shall be no more than 60 vapor hose connect/disconnect in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall keep accurate records of railcar loadings/unloadings, connects/disconnects, and liquid types. [District Rule 1070]
15. Records required by this permit shall be retained on site for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 1070]
16. The operator shall meet operating, inspection and re-inspection, maintenance, process pressure relief device (PRD) and component identification requirements of District Rule 4455 (4/20/05) for all components containing or contacting VOC, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455] Federally Enforceable Through Title V Permit
17. Except as follows, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rules 2201 and 4455] Federally Enforceable Through Title V Permit
18. The operator shall not use any component that leaks in excess of the allowable leak standards, except as follows. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
19. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455] Federally Enforceable Through Title V Permit
20. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be re-inspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
21. The operator shall inspect all components at least once every calendar quarter. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5 through 5.2.7. Components shall be inspected using EPA Method 21. [District Rule 4455] Federally Enforceable Through Title V Permit
22. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs, which shall continue to be inspected on a quarterly basis. [District Rule 4455] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the Rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this Rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455] Federally Enforceable Through Title V Permit
24. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455] Federally Enforceable Through Title V Permit
25. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455] Federally Enforceable Through Title V Permit
26. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of this Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
27. The tag shall include date and time of leak detection, date and time of leak measurement, indicate the leak concentration in ppmv (gas leaks), indicate whether it is a major or a minor leak (liquid leaks) and whether the leaking component is an essential component, unsafe-to-monitor component or critical component. [District Rule 4455] Federally Enforceable Through Title V Permit
28. All component leaks shall be immediately minimized to the extent possible, but not later than one hour after detection of leaks, in order to stop or reduce leakage to the atmosphere. As soon as practicable but not later than the time period specified in Table 3 of the Rule, components that have been identified as leaking and have had emissions minimized to the extent possible but do not meet the applicable leak standards of the Rule shall either be: 1) repaired or replaced, or 2) vented to a closed vent system, or 3) removed from operation. [District Rule 4455] Federally Enforceable Through Title V Permit
29. For any leaking component that is an essential or critical component, and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized but still exceeds any of the applicable leak standards of this Rule, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455] Federally Enforceable Through Title V Permit
30. For any component that has incurred five repair actions for major gas leaks or major liquid leaks (any combination) within a continuous 12-month period, the operator shall as soon as practicable but not later than 12 months after the date of detection either: 1) replace or retrofit the component with the control technology specified in Table 4 of the rule, or 2) replace the component with Best Available Control Technology (BACT) equipment, as approved by the APCO, or 3) vent the component to an APCO approved closed vent system as defined in Section 3.0 of the Rule, or 4) remove the component from operation. Inaccessible components, unsafe-to-monitor components, essential components, or critical components shall satisfy the above-listed requirement as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes earlier. The APCO shall be notified in writing prior to the replacement or retrofitting of any component. [District Rule 4455] Federally Enforceable Through Title V Permit
31. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455] 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.

32. The operator shall comply with the process PRD release notification and record keeping requirements specified in Section 6.3 of the Rule. After a release from process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. [District Rule 4455] Federally Enforceable Through Title V Permit
33. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and record keeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other APCO-approved system that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4455] Federally Enforceable Through Title V Permit
34. The operator shall keep a copy of the OMP at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing approved Operator Management Plan. [District Rule 4455] Federally Enforceable Through Title V Permit
35. Operator shall maintain an inspection log containing the information set forth in Sections 6.2.1.1 through 6.2.1.10 of the Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
36. The operator shall notify the APCO, by telephone or other APCO-approved methods, of any process PRD release in excess of 500 pounds of VOC in a continuous 24-hour period, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. The operator shall submit a written report to the APCO within thirty calendar days of following notification of process PRD release subject to 6.3.1 of the rule. The written report shall include all of the information set forth in Sections 6.3.2.1 through 6.3.2.5 of the Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
37. Measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument, calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. Operator shall keep a record of each instrument calibration in accordance with requirements as set forth Section 6.2.3 of the Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
38. The organic liquid loading operation shall be bottom loaded. [District Rule 4624] Federally Enforceable Through Title V Permit
39. The VOCs from the organic liquid transfer operation shall be routed to: a vapor collection and control system; or a fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a floating roof container that meets the control requirements in Rule 4623; or a pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements specified in Rule 4623; or a closed VOC emission control system. [District Rule 4624] Federally Enforceable Through Title V Permit
40. When utilizing a closed VOC emission control system or utilizing a container that meets the control requirements of Rule 4623 (Storage of Organic Liquids) to meet the emission control requirements of this permit, the transfer operation shall demonstrate compliance by complying with the leak inspection requirements of Rule 4624. [District 4624] Federally Enforceable Through Title V Permit
41. The vapor collection and control system, except when transferring liquefied petroleum gas, shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum [District Rule 4624] Federally Enforceable Through Title V Permit
42. For this Class 1 organic liquid transfer operation, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District 4624] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

43. The maximum liquid spillage/leaks from each hose disconnect shall not exceed 10 milliliters. [District Rule 4624] Federally Enforceable Through Title V Permit
44. Transfer rack shall be maintained and operated in accordance with the manufacturer's specifications, and operated such that there are no leaks or excess organic liquid drainage at disconnections as defined in Rule 4624. [District Rule 4624] Federally Enforceable Through Title V Permit
45. Except for components subject to Rule 4455, a leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute; or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above a background as methane when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from equipment into a container is not considered a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere [District Rule 4624] Federally Enforceable Through Title V Permit
46. Except for components subject to Rule 4455, permittee shall inspect the loading rack for leaks during transfer at least once every calendar quarter using a portable hydrocarbon detection instrument in accordance with EPA Method 21 or alternative method approved in writing by the APCO and EPA. [District Rule 4624] Federally Enforceable Through Title V Permit
47. Except for components subject to Rule 4455, all equipment found leaking shall be repaired or replaced within 72 hours. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replaced equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624] Federally Enforceable Through Title V Permit
48. Except for components subject to Rule 4455, an operator may apply for a written approval from the APCO to change the inspection frequency required by Rule 4624 from quarterly to annually provided no leaks were found during inspections required under provisions of Sections 5.9.1 and 5.9.2 of Rule 4624 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency shall revert back to quarterly and the operator shall contact the APCO in writing within 14 days. [District 4624] Federally Enforceable Through Title V Permit
49. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-71-14-13

EXPIRATION DATE: 08/31/2017

SECTION: SW35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

BUTAMER-BUTANE ISOMERIZATION UNIT #2 WITH 105 MMBTU/HR GAS-FIRED HOT OIL HEATER H-202 EQUIPPED WITH CALLIDUS MODEL CUBR-12W LOW-NOX BURNERS AND INTERNAL FGR, WITH NITROGEN PURGE SYSTEM SERVING COMPRESSOR SEALS AND COMPRESSOR CRANKCASES

PERMIT UNIT REQUIREMENTS

1. Operation shall include deisobutanizer tower T-202, stabilizer tower V-503, caustic scrubber tower V-110A, two butamer reactor vessels V-501 A/B, stabilizer receiver vessel V-502, and deisobutanizer overhead accumulator vessel V-203. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operation shall include seventeen shell & tube heat exchangers, four air-cooled heat exchangers, 350 hp recycle gas compressor C-401, and 20 hp emergency vent drum vapor compressor C-501. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Perchloroethylene shall be received, stored, and transferred using a pressurized and/or enclosed system shared with permit unit #S-71-4. [District Rule 2201] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fuel gas combusted in fired equipment may be comprised of process off-gas (including hydrogen), propane, butane, natural gas, or any combination thereof. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The heating value of the fuel gas (Btu/scf @ the hhv) combusted in fired equipment shall be determined by sample analysis at least annually. Results of sample analysis shall be retained on site and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Total heat input of fuel gas combusted in units S-71-4, '5, '14 and '15 shall not exceed 1,602,019 MMBtu/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The nitrogen purge system serving the liquid lines shall be a closed loop system and shall not vent to the atmosphere during operation of the system. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The nitrogen purge system serving the compressor seals and compressor crankcases shall vent through two activated charcoal canisters connected in series, except during scheduled maintenance or repair activities. During repair and maintenance (such as charcoal bed change out) VOC emissions shall be minimized to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The nitrogen purge system's used activated charcoal canisters shall be handled and disposed of in sealed containers, preventing VOC emissions to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The nitrogen purge system's activated charcoal canisters shall be replaced to maintain the VOC concentration from the canister vent less than 4,500 ppmv-VOC or periodically as recommended by the manufacturer, whichever occurs first. [District Rule 2201] 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. Maximum fugitive VOC emissions from permits #S-71-14 and '-15 shall not exceed 59.74 lb per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emission rates shall not exceed any of the following: PM10: 0.0137 lb/MMBtu; NOx (as NO2): 25 ppmv @ 3% O2; SOx (as SO2): 0.0006 lb/MMBtu; VOC: 0.00141 lb/MMBtu; or CO: 50 ppmv @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Process oil heater stack shall be equipped with sampling facilities for source testing in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
16. The stack concentration of NOx (as NO2), CO, and O2 shall be measured at least on a monthly basis using District approved portable analyzers. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of the date and time of NOx, CO, and O2 measurements, the measured NO2 and CO concentrations corrected to 3% O2, and the O2 concentration. The records shall also include a description of any corrective action taken to maintain the emissions in the acceptable range. These records shall be retained at the facility for a period of no less than five years and shall be made readily available for District inspection upon request. [District Rules 1070, 4305 and 4306] Federally Enforceable Through Title V Permit
18. If the NOx and/or CO concentrations, as measured by the portable analyzer, exceed the permitted emission limits, the permittee or third party shall notify the District and return the NOx and CO concentrations to the permitted emission limits as soon as possible but no longer than one (1) hour after detection. If the portable analyzer readings continue to exceed the permitted emission limits after (1) hour, the permittee shall conduct a source test within 60 days, of the first exceedance to demonstrate compliance with the permitted emission limits. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
19. District witnessed compliance source testing for NOx, CO, and SOx emission limits shall be conducted at least once every 12 months, except as provided below. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
20. District witnessed source testing to demonstrate compliance with NOx, CO, and SOx emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
21. If permittee fails any compliance demonstration for NOx, CO, or SOx emission limits when testing not less than once every 36 months, compliance with NOx, CO, and SOx emission limits shall be demonstrated not less than once every 12 months. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
22. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
25. For the purposes of source testing, the following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, SOx (lb/MMBtu) - EPA Method 19, and stack gas oxygen - EPA Method 3 or 3A or ARB Method 100. [District Rules 1081, 4305 and 4306] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

26. When the LPG supply source for make up fuel to the fuel gas system changes, the stack concentrations of NO_x, CO, and O₂ shall be measured with a District approved portable analyzer to verify emissions compliance. This is to be done anytime that LPG is being vaporized to supply make up fuel to the fuel gas system. [District Rule 2201, 4301, 4305 and 4306] Federally Enforceable Through Title V Permit
27. Permittee shall maintain accurate records of perchloroethylene usage, fuel gas heating value and daily, monthly and yearly records of fuel gas use. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
28. Permittee shall maintain accurate monthly records of the combined fuel gas combusted in units S-71-4, '5, '14 and '15. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
29. The operator shall meet operating, inspection and re-inspection, maintenance, process pressure relief device (PRD) and component identification requirements of District Rule 4455 (4/20/05) for all components containing or contacting VOC, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455, 5.0] Federally Enforceable Through Title V Permit
30. Except as follows, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rules 2201 and 4455] Federally Enforceable Through Title V Permit
31. The operator shall not use any component that leaks in excess of the allowable leak standards, except as follows. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the Rule. [District Rule 4455, 5.1.1] Federally Enforceable Through Title V Permit
32. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2] Federally Enforceable Through Title V Permit
33. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be re-inspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the Rule. [District Rule 4455, 5.2.1 and 5.2.2] Federally Enforceable Through Title V Permit
34. The operator shall inspect all components at least once every calendar quarter. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5 through 5.2.7. Components shall be inspected using EPA Method 21. [District Rule 4455, 5.2.3, 5.2.4, 5.25, 5.26, and 5.27] Federally Enforceable Through Title V Permit
35. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs, which shall continue to be inspected on a quarterly basis. [District Rule 4455] Federally Enforceable Through Title V Permit
36. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the Rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this Rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 and 5.2.10] 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.

37. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11]
38. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12] Federally Enforceable Through Title V Permit
39. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of this Rule. [District Rule 4455, 5.3.1 and 5.3.2] Federally Enforceable Through Title V Permit
40. The tag shall include date and time of leak detection, date and time of leak measurement, indicate the leak concentration in ppmv (gas leaks), indicate whether it is a major or a minor leak (liquid leaks) and whether the leaking component is an essential component, unsafe-to-monitor component or critical component. [District Rule 4455, 5.3.3] Federally Enforceable Through Title V Permit
41. All component leaks shall be immediately minimized to the extent possible, but not later than one hour after detection of leaks, in order to stop or reduce leakage to the atmosphere. As soon as practicable but not later than the time period specified in Table 3 of the Rule, components that have been identified as leaking and have had emissions minimized to the extent possible but do not meet the applicable leak standards of the Rule shall either be: 1) repaired or replaced, or 2) vented to a closed vent system, or 3) removed from operation. [District Rule 4455, 5.3.5] Federally Enforceable Through Title V Permit
42. For any leaking component that is an essential or critical component, and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized but still exceeds any of the applicable leak standards of this Rule, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6] Federally Enforceable Through Title V Permit
43. For any component that has incurred five repair actions for major gas leaks or major liquid leaks (any combination) within a continuous 12-month period, the operator shall as soon as practicable but not later than 12 months after the date of detection either: 1) replace or retrofit the component with the control technology specified in Table 4 of the rule, or 2) replace the component with Best Available Control Technology (BACT) equipment, as approved by the APCO, or 3) vent the component to an APCO approved closed vent system as defined in Section 3.0 of the Rule, or 4) remove the component from operation. Inaccessible components, unsafe-to-monitor components, essential components, or critical components shall satisfy the above-listed requirement as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes earlier. The APCO shall be notified in writing prior to the replacement or retrofitting of any component. [District Rule 4455, 5.3.7] Federally Enforceable Through Title V Permit
44. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1] Federally Enforceable Through Title V Permit
45. The operator shall comply with the process PRD release notification and record keeping requirements specified in Section 6.3 of the Rule. After a release from process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. [District Rule 4455, 5.4.3 and 5.4.4] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

46. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and record keeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other APCO-approved system that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4455, 5.5] Federally Enforceable Through Title V Permit
47. The operator shall keep a copy of the OMP at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing approved Operator Management Plan. [District Rule 4455, 6.1.2] Federally Enforceable Through Title V Permit
48. Operator shall maintain an inspection log containing the information set forth in Sections 6.2.1.1 through 6.2.1.10 of the Rule. [District Rule 4455, 6.2.1] Federally Enforceable Through Title V Permit
49. The operator shall notify the APCO, by telephone or other APCO-approved methods, of any process PRD release in excess of 500 pounds of VOC in a continuous 24-hour period, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. The operator shall submit a written report to the APCO within thirty calendar days of following notification of process PRD release subject to 6.3.1 of the rule. The written report shall include all of the information set forth in Sections 6.3.2.1 through 6.3.2.5 of the Rule. [District Rule 4455, 6.3] Federally Enforceable Through Title V Permit
50. Measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument, calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. Operator shall keep a record of each instrument calibration in accordance with requirements as set forth Section 6.2.3 of the Rule. [District Rule 4455, 6.4] Federally Enforceable Through Title V Permit
51. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455] Federally Enforceable Through Title V Permit
52. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
53. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-71-15-11

EXPIRATION DATE: 08/31/2017

SECTION: SW35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

SAFECAT FEEDSTOCK TREATMENT UNIT WITH 23 MMBTU/HR GAS-FIRED HEATER H-401 EQUIPPED WITH CALLIDUS MODEL CUBR-8P LOW-NOX BURNERS AND INTERNAL FGR

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. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Operation shall include SafeCat feed surge drum V-401, SafeCat reactor vessel V-402, SafeCat product separator vessel V-403, depropanizer receiver boot V-7, sulfur injection drum V-407, and three SafeCat adsorber vessels V-405 A/B/C. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operation shall include two SulfaTreat adsorber vessels V-102 A/B, SafeCat Feed prefilter vessel F-401, five shell & tube heat exchangers, and air-cooled heat exchanger. [District Rule 2201] Federally Enforceable Through Title V Permit
5. SafeCat feedstock treatment system gas shall be routed only to SafeCat feed stream or SulfaTreat sulfur removal equipment prior to introduction into facility fuel gas system. [District Rule 2201] Federally Enforceable Through Title V Permit
6. No on-site regeneration of SulfaTreat chemical is authorized. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Gas combusted in fired equipment may be comprised of process off-gas (including hydrogen), propane, butane, natural gas, or any combination thereof. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The heating value of the fuel gas (Btu/scf @ the hhv) combusted in fired equipment shall be determined by sample analysis at least annually. Results of sample analysis shall be retained on site and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total heat input of fuel gas combusted in units S-71-4, '5, '14 and '15 shall not exceed 1,602,019 MM Btu/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Leaks from valves, connectors, and other components (not including pump and compressor seals) subject to a BACT requirement and subject to the provisions of Rule 4455 shall be defined as a reading of methane on a portable hydrocarbon detection instrument in excess of 100 ppmv above background when measured as close as possible but not greater than one (1) cm from the potential source. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Leaks from pump and compressor seals subject to a BACT requirement and subject to the provisions of Rule 4455 shall be defined as a reading of methane on a portable hydrocarbon detection instrument in excess of 500 ppmv above background when measured as close as possible but not greater than one (1) cm from potential source. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum fugitive VOC emissions from permits #S-71-14 and '-15 shall not exceed 59.74 lb per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emission rates shall not exceed any of the following: PM10: 0.0137 lb/MMBtu; NOx (as NO2): 25 ppmv @ 3% O2; SOx (as SO2): 0.0006 lb/MMBtu; VOC: 0.00279 lb/MMBtu; or CO: 50 ppmv @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
15. SafeCat heater stack shall be equipped with sampling facilities for source testing in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
16. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305 & 4306] Federally Enforceable Through Title V Permit
17. The duration of each startup and shutdown period for the 23 MMBtu/hr gas-fired heater shall not exceed 7.7 hours and 2.0 hours respectively. Emission limits of Rules 4305 and 4306 are waived during periods of startup and shutdown. [District Rules 4305 & 4306] Federally Enforceable Through Title V Permit
18. The permittee shall maintain records of the duration of each startup period for the 23 MMBtu/hr gas-fired heater. [District Rules 4305 & 4306] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every month using a portable emission monitor. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
20. If the NOx and/or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. This unit shall be tested for compliance with the NO_x, CO, and SO_x emissions limits at least once every 12 months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
25. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. NO_x emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
26. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. CO emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
27. SO_x emissions for source test purposes shall be determined using EPA Method 19. [District Rule 1081] Federally Enforceable Through Title V Permit
28. Stack gas oxygen for source test purposes shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
29. If permittee fails any compliance demonstration for NO_x, CO, or SO_x emission limits when testing not less than once every 36 months, compliance with NO_x, CO, and SO_x emission limits shall be demonstrated not less than once every 12 months. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
30. When the LPG supply source for make up fuel to the fuel gas system changes, the stack concentrations of NO_x, CO, and O₂ shall be measured with a District approved portable analyzer to verify emissions compliance. This is to be done anytime that LPG is being vaporized to supply make up fuel to the fuel gas system. [District Rule 2201, 4301, 4305 and 4306] Federally Enforceable Through Title V Permit
31. Permittee shall maintain accurate records of perchloroethylene usage, fuel gas heat input, and daily, monthly and yearly records of fuel gas use. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
32. Permittee shall maintain accurate monthly records of the combined heat input of the fuel gas combusted in units S-71-4, '5, '14 and '15. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
33. The operator shall meet operating, inspection and re-inspection, maintenance, process pressure relief device (PRD) and component identification requirements of District Rule 4455 (4/20/05) for all components containing or contacting VOC, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455] Federally Enforceable Through Title V Permit
34. Except as follows, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rules 2201 and 4455] Federally Enforceable Through Title V Permit
35. The operator shall not use any component that leaks in excess of the allowable leak standards, except as follows. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
36. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455] 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.

37. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be re-inspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
38. The operator shall inspect all components at least once every calendar quarter. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5 through 5.2.7. Components shall be inspected using EPA Method 21. [District Rule 4455] Federally Enforceable Through Title V Permit
39. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs, which shall continue to be inspected on a quarterly basis. [District Rule 4455] Federally Enforceable Through Title V Permit
40. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the Rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this Rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455] Federally Enforceable Through Title V Permit
41. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455] Federally Enforceable Through Title V Permit
42. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455] Federally Enforceable Through Title V Permit
43. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of this Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
44. The tag shall include date and time of leak detection, date and time of leak measurement, indicate the leak concentration in ppmv (gas leaks), indicate whether it is a major or a minor leak (liquid leaks) and whether the leaking component is an essential component, unsafe-to-monitor component or critical component. [District Rule 4455] Federally Enforceable Through Title V Permit
45. All component leaks shall be immediately minimized to the extent possible, but not later than one hour after detection of leaks, in order to stop or reduce leakage to the atmosphere. As soon as practicable but not later than the time period specified in Table 3 of the Rule, components that have been identified as leaking and have had emissions minimized to the extent possible but do not meet the applicable leak standards of the Rule shall either be: 1) repaired or replaced, or 2) vented to a closed vent system, or 3) removed from operation. [District Rule 4455] Federally Enforceable Through Title V Permit
46. For any leaking component that is an essential or critical component, and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized but still exceeds any of the applicable leak standards of this Rule, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455] 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.

47. For any component that has incurred five repair actions for major gas leaks or major liquid leaks (any combination) within a continuous 12-month period, the operator shall as soon as practicable but not later than 12 months after the date of detection either: 1) replace or retrofit the component with the control technology specified in Table 4 of the rule, or 2) replace the component with Best Available Control Technology (BACT) equipment, as approved by the APCO, or 3) vent the component to an APCO approved closed vent system as defined in Section 3.0 of the Rule, or 4) remove the component from operation. Inaccessible components, unsafe-to-monitor components, essential components, or critical components shall satisfy the above-listed requirement as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes earlier. The APCO shall be notified in writing prior to the replacement or retrofitting of any component. [District Rule 4455] Federally Enforceable Through Title V Permit
48. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455] Federally Enforceable Through Title V Permit
49. The operator shall comply with the process PRD release notification and record keeping requirements specified in Section 6.3 of the Rule. After a release from process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. [District Rule 4455] Federally Enforceable Through Title V Permit
50. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and record keeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other APCO-approved system that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4455] Federally Enforceable Through Title V Permit
51. The operator shall keep a copy of the OMP at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing approved Operator Management Plan. [District Rule 4455] Federally Enforceable Through Title V Permit
52. Operator shall maintain an inspection log containing the information set forth in Sections 6.2.1.1 through 6.2.1.10 of the Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
53. The operator shall notify the APCO, by telephone or other APCO-approved methods, of any process PRD release in excess of 500 pounds of VOC in a continuous 24-hour period, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. The operator shall submit a written report to the APCO within thirty calendar days of following notification of process PRD release subject to 6.3.1 of the rule. The written report shall include all of the information set forth in Sections 6.3.2.1 through 6.3.2.5 of the Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
54. Measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument, calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. Operator shall keep a record of each instrument calibration in accordance with requirements as set forth Section 6.2.3 of the Rule. [District Rule 4455] Federally Enforceable Through Title V Permit
55. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455] 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.

56. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit
57. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Current Permit to Operate

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-71-2-11

EXPIRATION DATE: 08/31/2017

SECTION: SW35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

NATURAL GASOLINE AND LPG LOADING AND UNLOADING OPERATION WITH VAPOR CONTROL, TWO NATURAL GASOLINE AND LPG LOADING/UNLOADING RACKS, TWO LPG LOADING/UNLOADING RACKS, THREE 20,850 GALLON PRESSURIZED STORAGE TANKS, TWO 25 HP COMPRESSORS, PIPING TO PRESSURIZED (PERMIT EXEMPT) LPG TANKS, AND NITROGEN PURGE SYSTEM FOR LIQUID LINES, COMPRESSOR SEALS, AND COMPRESSOR CRANKCASES

PERMIT UNIT REQUIREMENTS

1. The loading racks shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 95%. [District Rule 4624] Federally Enforceable Through Title V Permit
2. Permittee shall comply with all applicable inspection, maintenance, testing, and recordkeeping requirements of Rules 4624 for organic liquid loading operations. [District Rules 4624] Federally Enforceable Through Title V Permit
3. Nitrogen purge system shall be a closed loop system and shall not vent to the atmosphere during operation of the system. [District Rule 2201] Federally Enforceable Through Title V Permit
4. After completion of truck loading/unloading, liquid lines shall be purged with nitrogen prior to disconnection. [District Rule 4624] Federally Enforceable Through Title V Permit
5. The nitrogen purge system serving the compressor seals and compressor crankcases shall vent through two activated charcoal canisters connected in series, except during scheduled maintenance or repair activities. During repair and maintenance (such as charcoal bed change out) VOC emissions shall be minimized to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The nitrogen purge system's used activated charcoal canisters shall be handled and disposed of in sealed containers, preventing VOC emissions to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The nitrogen purge system's activated charcoal canisters shall be replaced to maintain the VOC concentration from the canister vent less than 4,500 ppmv-VOC or periodically as recommended by the manufacturer, whichever occurs first. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Fugitive VOC emission rate shall not exceed 32.2 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Maximum VOC emissions from truck loading/unloading liquid hose connects/disconnects shall not exceed 3.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Maximum VOC emissions from truck loading/unloading vapor hose connects/disconnects shall not exceed 0.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
12. There shall be no more than 192 liquid hose connects/disconnects in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. There shall be no more than 192 vapor hose connects/disconnects in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The operator shall keep a copy of the APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4455] Federally Enforceable Through Title V Permit
15. In accordance with the approved OMP, the operator shall meet all applicable operating, inspection and re-inspection, maintenance, process pressure relief device (PRD), component identification, recordkeeping and notification requirements of Rule 4455 for all components containing or contacting VOC at the this gas liquids processing facility, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455] Federally Enforceable Through Title V Permit
16. Except for those components specified in condition 18, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility . [District Rule 4455] Federally Enforceable Through Title V Permit
17. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall maintain accurate daily records of the number of truck loading/unloading vapor hose connects/disconnects and truck loading/unloading liquid hose connects/disconnects. [District Rule 1070]
19. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455] Federally Enforceable Through Title V Permit
20. The organic liquid loading operation shall be bottom loaded. [District Rule 4624] Federally Enforceable Through Title V Permit
21. The VOCs from the organic liquid transfer operation shall be routed to: a vapor collection and control system; or a fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a floating roof container that meets the control requirements in Rule 4623; or a pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements specified in Rule 4623; or a closed VOC emission control system. [District Rule 4624] Federally Enforceable Through Title V Permit
22. When utilizing a closed VOC emission control system or utilizing a container that meets the control requirements of Rule 4623 (Storage of Organic Liquids) to meet the emission control requirements of this permit, the transfer operation shall demonstrate compliance by complying with the leak inspection requirements of Rule 4624. [District 4624] Federally Enforceable Through Title V Permit
23. The vapor collection and control system, except when transferring liquefied petroleum gas, shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum [District Rule 4624] Federally Enforceable Through Title V Permit
24. For this Class 1 organic liquid transfer operation, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District 4624] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

25. The maximum liquid spillage/leaks from each hose disconnect shall not exceed 10 milliliters. [District Rule 4624] Federally Enforceable Through Title V Permit
26. Transfer rack shall be maintained and operated in accordance with the manufacturer's specifications, and operated such that there are no leaks or excess organic liquid drainage at disconnections as defined in Rule 4624. [District Rule 4624] Federally Enforceable Through Title V Permit
27. Except for components subject to Rule 4455, a leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute; or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above a background as methane when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from equipment into a container is not considered a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere [District Rule 4624] Federally Enforceable Through Title V Permit
28. Except for components subject to Rule 4455, permittee shall inspect the loading rack for leaks during transfer at least once every calendar quarter using a portable hydrocarbon detection instrument in accordance with EPA Method 21 or alternative method approved in writing by the APCO and EPA. [District Rule 4624] Federally Enforceable Through Title V Permit
29. Except for components subject to Rule 4455, all equipment found leaking shall be repaired or replaced within 72 hours. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replaced equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624] Federally Enforceable Through Title V Permit
30. Except for components subject to Rule 4455, an operator may apply for a written approval from the APCO to change the inspection frequency required by Rule 4624 from quarterly to annually provided no leaks were found during inspections required under provisions of Sections 5.9.1 and 5.9.2 of Rule 4624 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency shall revert back to quarterly and the operator shall contact the APCO in writing within 14 days. [District 4624] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-71-4-15

EXPIRATION DATE: 08/31/2017

SECTION: 35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

BUTAMER-BUTANE ISOMERIZATION UNIT INCLUDING TWO BUTANE FEED DRYERS V-102A/B, HYDROGEN MAKE-UP DRYER V-106, TWO REGENERANT DRYERS V-107A/B, ONE 80 MMBTU/HR GAS-FIRED PROCESS OIL HEATER H-201 WITH SIX MODEL CUBR-10W LOW-NOX BURNERS AND FUEL PIPING SHARED WITH PERMIT #S-71-1

PERMIT UNIT REQUIREMENTS

1. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operation shall include feed surge drum V-103, one product separator V-104, two reactors R-101A/B, stabilizer receiver V-109, and one perchloroethylene storage/injection vessel V-105. [District Rules 2201 & 4102] Federally Enforceable Through Title V Permit
3. Operation shall include one spent caustic de-gas drum V-112, one stabilizer column V-108, and one net gas scrubber V-110. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operation shall include one de-isobutanizer tower T-201, one de-isobutanizer overhead accumulator V-201, one 125 HP recycle gas compressor C-101, and one hydrogen make-up knock-out drum V-115. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operation shall include hot oil circulation piping, exchangers, and miscellaneous vessels. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Hot oil drum shall be equipped with a pressure relief valve set at a minimum 100 psig and no greater than maximum pressure rating recommended by ASME or other recognized authority. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All VOC sampling connections, open-ended valves, and lines shall be equipped with two closed valves or be sealed with blind flanges, caps, or threaded plugs except during actual use. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Perchloroethylene storage vessel shall be blanketed with inert gas. [District Rule 4102] Federally Enforceable Through Title V Permit
9. Perchloroethylene storage vessel shall be equipped with a pressure relief valve set at a minimum pressure of 50 psig. [District Rule 4102] Federally Enforceable Through Title V Permit
10. Hot oil drum shall be fuel gas blanketed with vent to fuel gas system. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Fuel gas combusted in fired equipment may be comprised of process off-gas (including hydrogen), propane, butane, natural gas, or any combination thereof. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The heating value of the fuel gas (Btu/scf @ hhv) combusted in fired equipment shall be determined by sample analysis at least annually. Results of sample analysis shall be retained on site and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: PLAINS LPG SERVICES, L.P.

Location: 7TH STANDARD & BEECH, SHAFTER, CA 93263

S-71-4-15: Oct 2 2013 10:25AM - TORID

13. Total heat input of fuel gas combusted in units S-71-4, '5, '14 and '15 shall not exceed 1,602,019 MM Btu/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Perchloroethylene receiving line shall be blown dry to storage vessel using an inert gas upon completion of transfer. [District Rule 4102] Federally Enforceable Through Title V Permit
15. Only heat transfer fluid manufactured and marketed for such use shall be used in a closed loop as heat transfer medium. [District Rule 2201] Federally Enforceable Through Title V Permit
16. All excess gas shall be incinerated in process heater firebox or existing boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Fugitive VOC emission rate shall not exceed 46.5 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Emission rates shall not exceed any of the following: PM10: 0.005 lb/MMBtu; NOx (as NO2): 25 ppmv @ 3% O2; VOC: 0.00275 lb/MMBtu; SOx (as SO2): 0.0005 lb/MMBtu; or CO: 50 ppmv @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Hot oil heater stack shall be equipped with sampling facilities for source testing in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 2201] Federally Enforceable Through Title V Permit
21. The operator shall keep a copy of the APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4455] Federally Enforceable Through Title V Permit
22. In accordance with the approved OMP, the operator shall meet all applicable operating, inspection and re-inspection, maintenance, process pressure relief device (PRD), component identification, recordkeeping and notification requirements of Rule 4455 for all components containing or contacting VOC at the this gas liquids processing facility, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455] Federally Enforceable Through Title V Permit
23. Except for those components specified in condition 24, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. [District Rule 4455] Federally Enforceable Through Title V Permit
24. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21. [District Rule 2201] Federally Enforceable Through Title V Permit
25. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. The duration of each startup and shutdown period for the 80 MMBtu/hr gas-fired process oil heater shall not exceed 5.5 hours and 2.0 hours respectively. Emission limits of Rules 4305, 4306 and 4320 are waived during periods of startup and shutdown. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. The permittee shall maintain records of the duration of each startup period for the 80 MMBtu/hr gas-fired process oil heater. [District Rules 4305, 4306 and 4320] 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.

28. The permittee shall monitor and record the stack concentration of NO_x (as NO₂), CO, and O₂ at least once every month using a portable emission monitor. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305,4306 and 4320] Federally Enforceable Through Title V Permit
29. If the NO_x and/or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4305,4306 and 4320] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
32. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
33. This unit shall be source tested for compliance with the NO_x, CO, and SO_x emissions limits at least once every 12 months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
34. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. NO_x emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
35. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. CO emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
36. SO_x emissions for source test purposes shall be determined using EPA Method 19. [District Rule 1081] Federally Enforceable Through Title V Permit
37. Stack gas oxygen for source test purposes shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
38. If permittee fails any compliance demonstration for NO_x, CO, or SO_x emission limits when testing not less than once every 36 months, compliance with NO_x, CO, and SO_x emission limits shall be demonstrated not less than once every 12 months. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
39. Permittee shall maintain accurate records of perchloroethylene usage, fuel gas heating value, and daily, monthly and annual records of fuel gas use. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
40. Permittee shall maintain accurate monthly records of the combined heat input of the fuel gas combusted in units S-71-4, '5, '14 and '15. [Districts Rule 1070 and 2201] 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.

41. When the LPG supply source for make up fuel to the fuel gas system changes, the stack concentrations of NO_x, CO, and O₂ shall be measured with a District approved portable analyzer to verify emissions compliance. This is to be done anytime that LPG is being vaporized to supply make up fuel to the fuel gas system. [District Rule 2201, 4301, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
42. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-71-12-8

EXPIRATION DATE: 08/31/2017

SECTION: 35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

RAILCAR LPG/NATURAL GASOLINE LOADING/UNLOADING OPERATION WITH FIFTEEN LPG/NATURAL GASOLINE LOADING/UNLOADING STATIONS INCLUDING: ELEVATED RACK SYSTEM UTILIZING HARD PIPING AND SWIVEL JOINTS; AND NITROGEN PURGE SYSTEM SERVING LIQUID LINES, COMPRESSOR SEALS, AND COMPRESSOR CRANKCASES

PERMIT UNIT REQUIREMENTS

1. Operation shall include 15 railcar loading/unloading stations each equipped with two (2) liquid lines and one (1) vapor return line for a total of 45 loading arms with 225 swivel joints. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The nitrogen purge system serving the liquid lines shall be a closed loop system and shall not vent to the atmosphere during operation of the system. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The nitrogen purge system serving the compressor seals and compressor crankcases shall vent through two activated charcoal canisters connected in series, except during scheduled maintenance or repair activities. During repair and maintenance (such as charcoal bed change out) VOC emissions shall be minimized to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The nitrogen purge system's used activated charcoal canisters shall be handled and disposed of in sealed containers, preventing VOC emissions to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The nitrogen purge system's activated charcoal canisters shall be replaced to maintain the VOC concentration from the canister vent less than 4,500 ppmv-VOC or periodically as recommended by the manufacturer, whichever occurs first. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Operation shall include three vapor compressors equipped with knock-out vessels and not exceeding 100 hp each, three compressor knock-out drum pumps, and five turbine pumps. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive VOC emissions from valves, flanges, connectors, pump seals, and other fugitive components associated with this permit unit shall not exceed 67.8 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum VOC emissions from railcar loading/unloading (vapor and liquid losses combined) operation shall not exceed 2.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using "California Implementation Guidelines for estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Oil and Gas Production Operations Screening Value Ranges Emission Factors Table IV-2c Feb 1999. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The permittee shall comply with all inspection, maintenance, testing, and recordkeeping requirements of Rules 4624 for the organic liquid loading operation. [District Rule 4624] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. The loading racks shall be equipped with a vapor return system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 95%. [District Rule 2201] Federally Enforceable Through Title V Permit
12. There shall be no more than 120 liquid hose connects/disconnects in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. There shall be no more than 60 vapor hose connect/disconnect in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall keep accurate records of railcar loadings/unloadings, connects/disconnects, and liquid types. [District Rule 1070] Federally Enforceable Through Title V Permit
15. Records required by this permit shall be retained on site for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
16. The operator shall keep a copy of the APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4455] Federally Enforceable Through Title V Permit
17. In accordance with the approved OMP, the operator shall meet all applicable operating, inspection and re-inspection, maintenance, process pressure relief device (PRD), component identification, recordkeeping and notification requirements of Rule 4455 for all components containing or contacting VOC at the this gas liquids processing facility, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455] Federally Enforceable Through Title V Permit
18. Except for those components specified in condition 20, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility . [District Rule 4455] Federally Enforceable Through Title V Permit
19. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rule 2201] Federally Enforceable Through Title V Permit
20. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455] Federally Enforceable Through Title V Permit
21. The organic liquid loading operation shall be bottom loaded. [District Rule 4624] Federally Enforceable Through Title V Permit
22. The VOCs from the organic liquid transfer operation shall be routed to: a vapor collection and control system; or a fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a floating roof container that meets the control requirements in Rule 4623; or a pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements specified in Rule 4623; or a closed VOC emission control system. [District Rule 4624] Federally Enforceable Through Title V Permit
23. When utilizing a closed VOC emission control system or utilizing a container that meets the control requirements of Rule 4623 (Storage of Organic Liquids) to meet the emission control requirements of this permit, the transfer operation shall demonstrate compliance by complying with the leak inspection requirements of Rule 4624. [District 4624] Federally Enforceable Through Title V Permit
24. The vapor collection and control system, except when transferring liquefied petroleum gas, shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum [District Rule 4624] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

25. For this Class 1 organic liquid transfer operation, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District 4624] Federally Enforceable Through Title V Permit
26. The maximum liquid spillage/leaks from each hose disconnect shall not exceed 10 milliliters. [District Rule 4624] Federally Enforceable Through Title V Permit
27. Transfer rack shall be maintained and operated in accordance with the manufacturer's specifications, and operated such that there are no leaks or excess organic liquid drainage at disconnections as defined in Rule 4624. [District Rule 4624] Federally Enforceable Through Title V Permit
28. Except for components subject to Rule 4455, a leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute; or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above a background as methane when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. Any liquid or gas coming from a component undergoing repair or replacement, or during sampling of process fluid from equipment into a container is not considered a leak provided such activities are accomplished as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere [District Rule 4624] Federally Enforceable Through Title V Permit
29. Except for components subject to Rule 4455, permittee shall inspect the loading rack for leaks during transfer at least once every calendar quarter using a portable hydrocarbon detection instrument in accordance with EPA Method 21 or alternative method approved in writing by the APCO and EPA. [District Rule 4624] Federally Enforceable Through Title V Permit
30. Except for components subject to Rule 4455, all equipment found leaking shall be repaired or replaced within 72 hours. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replaced equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624] Federally Enforceable Through Title V Permit
31. Except for components subject to Rule 4455, an operator may apply for a written approval from the APCO to change the inspection frequency required by Rule 4624 from quarterly to annually provided no leaks were found during inspections required under provisions of Sections 5.9.1 and 5.9.2 of Rule 4624 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency shall revert back to quarterly and the operator shall contact the APCO in writing within 14 days. [District 4624] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-71-14-12

EXPIRATION DATE: 08/31/2017

SECTION: SW35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

BUTAMER-BUTANE ISOMERIZATION UNIT #2 WITH 105 MMBTU/HR GAS-FIRED HOT OIL HEATER H-202 EQUIPPED WITH CALLIDUS MODEL CUBR-12W LOW-NOX BURNERS AND INTERNAL FGR, WITH NITROGEN PURGE SYSTEM SERVING COMPRESSOR SEALS AND COMPRESSOR CRANKCASES

PERMIT UNIT REQUIREMENTS

1. Operation shall include deisobutanizer tower T-202, stabilizer tower V-503, caustic scrubber tower V-110A, two butamer reactor vessels V-501 A/B, stabilizer receiver vessel V-502, and deisobutanizer overhead accumulator vessel V-203. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operation shall include seventeen shell & tube heat exchangers, four air-cooled heat exchangers, 350 hp recycle gas compressor C-401, and 20 hp emergency vent drum vapor compressor C-501. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Perchloroethylene shall be received, stored, and transferred using a pressurized and/or enclosed system shared with permit unit #S-71-4. [District Rule 2201] Federally Enforceable Through Title V Permit
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fuel gas combusted in fired equipment may be comprised of process off-gas (including hydrogen), propane, butane, natural gas, or any combination thereof. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The heating value of the fuel gas (Btu/scf @ the hhv) combusted in fired equipment shall be determined by sample analysis at least annually. Results of sample analysis shall be retained on site and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Total heat input of fuel gas combusted in units S-71-4, '5, '14 and '15 shall not exceed 1,602,019 MMBtu/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The nitrogen purge system serving the liquid lines shall be a closed loop system and shall not vent to the atmosphere during operation of the system. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The nitrogen purge system serving the compressor seals and compressor crankcases shall vent through two activated charcoal canisters connected in series, except during scheduled maintenance or repair activities. During repair and maintenance (such as charcoal bed change out) VOC emissions shall be minimized to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The nitrogen purge system's used activated charcoal canisters shall be handled and disposed of in sealed containers, preventing VOC emissions to the fullest extent possible. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The nitrogen purge system's activated charcoal canisters shall be replaced to maintain the VOC concentration from the canister vent less than 4,500 ppmv-VOC or periodically as recommended by the manufacturer, whichever occurs first. [District Rule 2201] 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. Maximum fugitive VOC emissions from permits #S-71-14 and '-15 shall not exceed 63.2 lb per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emission rates shall not exceed any of the following: PM10: 0.0137 lb/MMBtu; NOx (as NO2): 25 ppmv @ 3% O2; SOx (as SO2): 0.0006 lb MMBtu; VOC: 0.00141 lb/MMBtu; or CO: 50 ppmv @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Process oil heater stack shall be equipped with sampling facilities for source testing in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
16. The stack concentration of NOx (as NO2), CO, and O2 shall be measured at least on a monthly basis using District approved portable analyzers. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. The permittee shall maintain records of the date and time of NOx, CO, and O2 measurements, the measured NO2 and CO concentrations corrected to 3% O2, and the O2 concentration. The records shall also include a description of any corrective action taken to maintain the emissions in the acceptable range. These records shall be retained at the facility for a period of no less than five years and shall be made readily available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. If the NOx and/or CO concentrations, as measured by the portable analyzer, exceed the permitted emission limits, the permittee or third party shall notify the District and return the NOx and CO concentrations to the permitted emission limits as soon as possible but no longer than one (1) hour after detection. If the portable analyzer readings continue to exceed the permitted emission limits after (1) hour, the permittee shall conduct a source test within 60 days, of the first exceedance to demonstrate compliance with the permitted emission limits. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. District witnessed compliance source testing for NOx, CO, and SOx emission limits shall be conducted at least once every 12 months, except as provided below. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. District witnessed source testing to demonstrate compliance with NOx, CO, and SOx emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. If permittee fails any compliance demonstration for NOx, CO, or SOx emission limits when testing not less than once every 36 months, compliance with NOx, CO, and SOx emission limits shall be demonstrated not less than once every 12 months. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
25. For the purposes of source testing, the following test methods shall be used: NOx (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, SOx (lb/MMBtu) - EPA Method 19, and stack gas oxygen - EPA Method 3 or 3A or ARB Method 100. [District Rules 1081, 4305, 4306 and 4320] 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.

26. When the LPG supply source for make up fuel to the fuel gas system changes, the stack concentrations of NO_x, CO, and O₂ shall be measured with a District approved portable analyzer to verify emissions compliance. This is to be done anytime that LPG is being vaporized to supply make up fuel to the fuel gas system. [District Rule 2201, 4301, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. Permittee shall maintain accurate records of perchloroethylene usage, fuel gas heating value and daily, monthly and yearly records of fuel gas use. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
28. Permittee shall maintain accurate monthly records of the combined fuel gas combusted in units S-71-4, '5, '14 and '15. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
29. The operator shall keep a copy of the APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4455] Federally Enforceable Through Title V Permit
30. In accordance with the approved OMP, the operator shall meet all applicable operating, inspection and re-inspection, maintenance, process pressure relief device (PRD), component identification, recordkeeping and notification requirements of Rule 4455 for all components containing or contacting VOC at the this gas liquids processing facility, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455] Federally Enforceable Through Title V Permit
31. Except for those components specified in condition 32, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility . [District Rule 4455] Federally Enforceable Through Title V Permit
32. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rule 2201] Federally Enforceable Through Title V Permit
33. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-71-15-10

EXPIRATION DATE: 08/31/2017

SECTION: SW35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

SAFECAT FEEDSTOCK TREATMENT UNIT WITH 23 MMBTU/HR GAS-FIRED HEATER H-401 EQUIPPED WITH CALLIDUS MODEL CUBR-8P LOW-NOX BURNERS AND INTERNAL FGR

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. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Operation shall include SafeCat feed surge drum V-401, SafeCat reactor vessel V-402, SafeCat product separator vessel V-403, depropanizer receiver boot V-7, sulfur injection drum V-407, and three SafeCat adsorber vessels V-405 A/B/C. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operation shall include two SulfaTreat adsorber vessels V-102 A/B, SafeCat Feed prefilter vessel F-401, five shell & tube heat exchangers, and air-cooled heat exchanger. [District Rule 2201] Federally Enforceable Through Title V Permit
5. SafeCat feedstock treatment system gas shall be routed only to SafeCat feed stream or SulfaTreat sulfur removal equipment prior to introduction into facility fuel gas system. [District Rule 2201] Federally Enforceable Through Title V Permit
6. No on-site regeneration of SulfaTreat chemical is authorized. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Gas combusted in fired equipment may be comprised of process off-gas (including hydrogen), propane, butane, natural gas, or any combination thereof. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The heating value of the fuel gas (Btu/scf @ the hhv) combusted in fired equipment shall be determined by sample analysis at least annually. Results of sample analysis shall be retained on site and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total heat input of fuel gas combusted in units S-71-4, '5, '14 and '15 shall not exceed 1,602,019 MM Btu/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Leaks from valves, connectors, and other components (not including pump and compressor seals) subject to a BACT requirement and subject to the provisions of Rule 4455 shall be defined as a reading of methane on a portable hydrocarbon detection instrument in excess of 100 ppmv above background when measured as close as possible but not greater than one (1) cm from the potential source. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Leaks from pump and compressor seals subject to a BACT requirement and subject to the provisions of Rule 4455 shall be defined as a reading of methane on a portable hydrocarbon detection instrument in excess of 500 ppmv above background when measured as close as possible but not greater than one (1) cm from potential source. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum fugitive VOC emissions from permits #S-71-14 and '-15 shall not exceed 63.2 lb per day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emission rates shall not exceed any of the following: PM10: 0.0137 lb/MMBtu; NOx (as NO2): 25 ppmv @ 3% O2; SOx (as SO2): 0.0006 lb/MMBtu; VOC: 0.00279 lb/MMBtu; or CO: 50 ppmv @ 3% O2. [District Rule 2201] Federally Enforceable Through Title V Permit
15. SafeCat heater stack shall be equipped with sampling facilities for source testing in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
16. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. The duration of each startup and shutdown period for the 23 MMBtu/hr gas-fired heater shall not exceed 7.7 hours and 2.0 hours respectively. Emission limits of Rules 4305, 4306 and 4320 are waived during periods of startup and shutdown. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. The permittee shall maintain records of the duration of each startup period for the 23 MMBtu/hr gas-fired heater. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every month using a portable emission monitor. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. If the NOx and/or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. This unit shall be tested for compliance with the NO_x, CO, and SO_x emissions limits at least once every 12 months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
25. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. NO_x emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
26. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. CO emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. SO_x emissions for source test purposes shall be determined using EPA Method 19. [District Rule 1081] Federally Enforceable Through Title V Permit
28. Stack gas oxygen for source test purposes shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. If permittee fails any compliance demonstration for NO_x, CO, or SO_x emission limits when testing not less than once every 36 months, compliance with NO_x, CO, and SO_x emission limits shall be demonstrated not less than once every 12 months. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
30. When the LPG supply source for make up fuel to the fuel gas system changes, the stack concentrations of NO_x, CO, and O₂ shall be measured with a District approved portable analyzer to verify emissions compliance. This is to be done anytime that LPG is being vaporized to supply make up fuel to the fuel gas system. [District Rule 2201, 4301, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
31. Permittee shall maintain accurate records of perchloroethylene usage, fuel gas heat input, and daily, monthly and yearly records of fuel gas use. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
32. Permittee shall maintain accurate monthly records of the combined heat input of the fuel gas combusted in units S-71-4, '5, '14 and '15. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
33. The operator shall keep a copy of the APCO-approved Operator Management Plan (OMP) at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rule 4455] Federally Enforceable Through Title V Permit
34. In accordance with the approved OMP, the operator shall meet all applicable operating, inspection and re-inspection, maintenance, process pressure relief device (PRD), component identification, recordkeeping and notification requirements of Rule 4455 for all components containing or contacting VOC at the this gas liquids processing facility, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455] Federally Enforceable Through Title V Permit
35. Except for those components specified in condition 36, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility . [District Rule 4455] Federally Enforceable Through Title V Permit
36. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measured per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rule 2201] Federally Enforceable Through Title V Permit
37. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455] Federally Enforceable Through Title V Permit

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

ATTACHMENT C

Authority to Construct



AUTHORITY TO CONSTRUCT

PERMIT NO: S-71-2-10

ISSUANCE DATE: 10/11/2010

LEGAL OWNER OR OPERATOR: PLAINS LPG SERVICES, L.P.

MAILING ADDRESS: 19430 BEECH AVE
SHAFTER, CA 93263

LOCATION: 7TH STANDARD & BEECH
SHAFTER, CA 93263

SECTION: SW35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

MODIFICATION OF NATURAL GASOLINE AND LPG LOADING AND UNLOADING OPERATION WITH VAPOR CONTROL, TWO NATURAL GASOLINE AND LPG LOADING/UNLOADING RACKS, TWO LPG LOADING/UNLOADING RACKS, THREE 20,850 GALLON PRESSURIZED STORAGE TANKS, TWO 25 HP COMPRESSORS, PIPING TO PRESSURIZED (PERMIT EXEMPT) LPG TANKS, AND NITROGEN PURGE SYSTEM FOR LIQUID LINES, COMPRESSOR SEALS, AND COMPRESSOR CRANKCASES: DECREASE FUGITIVE VOC COMPONENT COUNT

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. The loading racks shall be equipped with a vapor loss prevention system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 95%. [District Rule 4624]
3. Permittee shall comply with all applicable inspection, maintenance, testing, and recordkeeping requirements of Rules 4624 for organic liquid loading operations. [District Rules 4624]
4. Nitrogen purge system shall be a closed loop system and shall not vent to the atmosphere during operation of the system. [District Rule 2201]
5. After completion of truck loading/unloading, liquid lines shall be purged with nitrogen prior to disconnection. [District Rule 4624]
6. The nitrogen purge system serving the compressor seals and compressor crankcases shall vent through two activated charcoal canisters connected in series, except during scheduled maintenance or repair activities. During repair and maintenance (such as charcoal bed change out) VOC emissions shall be minimized to the fullest extent possible. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

7. The nitrogen purge system's used activated charcoal canisters shall be handled and disposed of in sealed containers, preventing VOC emissions to the fullest extent possible. [District Rule 2201]
8. The nitrogen purge system's activated charcoal canisters shall be replaced to maintain the VOC concentration from the canister vent less than 4,500 ppmv-VOC or periodically as recommended by the manufacturer, whichever occurs first. [District Rule 2201]
9. Fugitive VOC emission rate shall not exceed 32.19 pounds per day. [District Rule 2201]
10. Maximum VOC emissions from truck loading/unloading liquid hose connects/disconnects shall not exceed 3.5 lb/day. [District Rule 2201]
11. Maximum VOC emissions from truck loading/unloading vapor hose connects/disconnects shall not exceed 0.3 lb/day. [District Rule 2201]
12. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201]
13. There shall be no more than 192 liquid hose connects/disconnects in any one day. [District Rule 2201]
14. There shall be no more than 192 vapor hose connects/disconnects in any one day. [District Rule 2201]
15. Permittee shall maintain accurate daily records of the number of truck loading/unloading vapor hose connects/disconnects and truck loading/unloading liquid hose connects/disconnects. [District Rule 1070]
16. The operator shall meet operating, inspection and re-inspection, maintenance, process pressure relief device (PRD) and component identification requirements of District Rule 4455 (4/20/05) for all components containing or contacting VOC, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455, 5.0]
17. Except as follows, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rules 2201 and 4455]
18. The operator shall not use any component that leaks in excess of the allowable leak standards, except as follows. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the Rule. [District Rule 4455, 5.1.1]
19. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2]
20. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be re-inspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the Rule. [District Rule 4455, 5.2.1 and 5.2.2]
21. The operator shall inspect all components at least once every calendar quarter. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5 through 5.2.7. Components shall be inspected using EPA Method 21. [District Rule 4455, 5.2.3, 5.2.4, 5.25, 5.26, and 5.27]
22. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs, which shall continue to be inspected on a quarterly basis. [District Rule 4455]

CONDITIONS CONTINUE ON NEXT PAGE

23. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the Rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this Rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 and 5.2.10]
24. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11]
25. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12]
26. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of this Rule. [District Rule 4455, 5.3.1 and 5.3.2]
27. The tag shall include date and time of leak detection, date and time of leak measurement, indicate the leak concentration in ppmv (gas leaks), indicate whether it is a major or a minor leak (liquid leaks) and whether the leaking component is an essential component, unsafe-to-monitor component or critical component. [District Rule 4455, 5.3.3]
28. All component leaks shall be immediately minimized to the extent possible, but not later than one hour after detection of leaks, in order to stop or reduce leakage to the atmosphere. As soon as practicable but not later than the time period specified in Table 3 of the Rule, components that have been identified as leaking and have had emissions minimized to the extent possible but do not meet the applicable leak standards of the Rule shall either be: 1) repaired or replaced, or 2) vented to a closed vent system, or 3) removed from operation. [District Rule 4455, 5.3.5]
29. For any leaking component that is an essential or critical component, and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized but still exceeds any of the applicable leak standards of this Rule, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6]
30. For any component that has incurred five repair actions for major gas leaks or major liquid leaks (any combination) within a continuous 12-month period, the operator shall as soon as practicable but not later than 12 months after the date of detection either: 1) replace or retrofit the component with the control technology specified in Table 4 of the rule, or 2) replace the component with Best Available Control Technology (BACT) equipment, as approved by the APCO, or 3) vent the component to an APCO approved closed vent system as defined in Section 3.0 of the Rule, or 4) remove the component from operation. Inaccessible components, unsafe-to-monitor components, essential components, or critical components shall satisfy the above-listed requirement as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes earlier. The APCO shall be notified in writing prior to the replacement or retrofitting of any component. [District Rule 4455, 5.3.7]
31. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1]
32. The operator shall comply with the process PRD release notification and record keeping requirements specified in Section 6.3 of the Rule. After a release from process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. [District Rule 4455, 5.4.3 and 5.4.4]

CONDITIONS CONTINUE ON NEXT PAGE

33. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and record keeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other APCO-approved system that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4455, 5.5]
34. The operator shall keep a copy of the OMP at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing approved Operator Management Plan. [District Rule 4455, 6.1.2]
35. Operator shall maintain an inspection log containing the information set forth in Sections 6.2.1.1 through 6.2.1.10 of the Rule. [District Rule 4455, 6.2.1]
36. The operator shall notify the APCO, by telephone or other APCO-approved methods, of any process PRD release in excess of 500 pounds of VOC in a continuous 24-hour period, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. The operator shall submit a written report to the APCO within thirty calendar days of following notification of process PRD release subject to 6.3.1 of the rule. The written report shall include all of the information set forth in Sections 6.3.2.1 through 6.3.2.5 of the Rule. [District Rule 4455, 6.3]
37. Measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument, calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. Operator shall keep a record of each instrument calibration in accordance with requirements as set forth Section 6.2.3 of the Rule. [District Rule 4455, 6.4]
38. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455]



AUTHORITY TO CONSTRUCT

PERMIT NO: S-71-4-14

ISSUANCE DATE: 10/11/2010

LEGAL OWNER OR OPERATOR: PLAINS LPG SERVICES, L.P.

MAILING ADDRESS: 19430 BEECH AVE
SHAFTER, CA 93263

LOCATION: 7TH STANDARD & BEECH
SHAFTER, CA 93263

SECTION: 35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

MODIFICATION OF BUTAMER-BUTANE ISOMERIZATION UNIT INCLUDING TWO BUTANE FEED DRYERS V-102A/B, HYDROGEN MAKE-UP DRYER V-106, TWO REGENERANT DRYERS V-107A/B, ONE 80 MMBTU/HR GAS-FIRED PROCESS OIL HEATER H-201 WITH SIX MODEL CUBR-10W LOW-NOX BURNERS AND FUEL PIPING SHARED WITH PERMIT #S-71-1: DECREASE FUGITIVE VOC COMPONENT COUNT

CONDITIONS

1. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201]
2. Operation shall include feed surge drum V-103, one product separator V-104, two reactors R-101A/B, stabilizer receiver V-109, and one perchloroethylene storage/injection vessel V-105. [District Rules 2201 & 4102]
3. Operation shall include one spent caustic de-gas drum V-112, one stabilizer column V-108, and one net gas scrubber V-110. [District Rule 2201]
4. Operation shall include one de-isobutanizer tower T-201, one de-isobutanizer overhead accumulator V-201, one 125 HP recycle gas compressor C-101, and one hydrogen make-up knock-out drum V-115. [District Rule 2201]
5. Operation shall include hot oil circulation piping, exchangers, and miscellaneous vessels. [District Rule 2201]
6. Hot oil drum shall be equipped with a pressure relief valve set at a minimum 100 psig and no greater than maximum pressure rating recommended by ASME or other recognized authority. [District Rule 2201]
7. All VOC sampling connections, open-ended valves, and lines shall be equipped with two closed valves or be sealed with blind flanges, caps, or threaded plugs except during actual use. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

8. Perchloroethylene storage vessel shall be blanketed with inert gas. [District Rule 4102]
9. Perchloroethylene storage vessel shall be equipped with a pressure relief valve set at a minimum pressure of 50 psig. [District Rule 4102]
10. Hot oil drum shall be fuel gas blanketed with vent to fuel gas system. [District Rule 2201]
11. Fuel gas combusted in fired equipment may be comprised of process off-gas (including hydrogen), propane, butane, natural gas, or any combination thereof. [District Rule 2201]
12. The heating value of the fuel gas (Btu/scf @ hhv) combusted in fired equipment shall be determined by sample analysis at least annually. Results of sample analysis shall be retained on site and made available for District inspection upon request. [District Rule 2201]
13. Total heat input of fuel gas combusted in units S-71-4, '5, '14 and '15 shall not exceed 1,602,019 MM Btu/yr. [District Rule 2201]
14. Perchloroethylene receiving line shall be blown dry to storage vessel using an inert gas upon completion of transfer. [District Rule 4102]
15. Only heat transfer fluid manufactured and marketed for such use shall be used in a closed loop as heat transfer medium. [District Rule 2201]
16. All excess gas shall be incinerated in process heater firebox or existing boiler. [District Rule 2201]
17. Fugitive VOC emission rate shall not exceed 46.40 pounds per day. [District Rule 2201]
18. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201]
19. Emission rates shall not exceed any of the following: PM₁₀: 0.005 lb/MMBtu; NO_x (as NO₂): 25 ppmv @ 3% O₂; VOC: 0.00275 lb/MMBtu; SO_x (as SO₂): 0.0005 lb/MMBtu; or CO: 50 ppmv @ 3% O₂. [District Rule 2201]
20. Hot oil heater stack shall be equipped with sampling facilities for source testing in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 2201]
21. The operator shall meet operating, inspection and re-inspection, maintenance, process pressure relief device (PRD) and component identification requirements of District Rule 4455 (4/20/05) for all components containing or contacting VOC, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455, 5.0]
22. Except as follows, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rules 2201 and 4455]
23. The operator shall not use any component that leaks in excess of the allowable leak standards, except as follows. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the Rule. [District Rule 4455, 5.1.1]
24. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2]
25. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be re-inspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the Rule. [District Rule 4455, 5.2.1 and 5.2.2]

CONDITIONS CONTINUE ON NEXT PAGE

26. The operator shall inspect all components at least once every calendar quarter. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5 through 5.2.7. Components shall be inspected using EPA Method 21. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6, and 5.2.7]
27. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs, which shall continue to be inspected on a quarterly basis. [District Rule 4455]
28. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the Rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this Rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 and 5.2.10]
29. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11]
30. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12]
31. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of this Rule. [District Rule 4455, 5.3.1 and 5.3.2]
32. The tag shall include date and time of leak detection, date and time of leak measurement, indicate the leak concentration in ppmv (gas leaks), indicate whether it is a major or a minor leak (liquid leaks) and whether the leaking component is an essential component, unsafe-to-monitor component or critical component. [District Rule 4455, 5.3.3]
33. All component leaks shall be immediately minimized to the extent possible, but not later than one hour after detection of leaks, in order to stop or reduce leakage to the atmosphere. As soon as practicable but not later than the time period specified in Table 3 of the Rule, components that have been identified as leaking and have had emissions minimized to the extent possible but do not meet the applicable leak standards of the Rule shall either be: 1) repaired or replaced, or 2) vented to a closed vent system, or 3) removed from operation. [District Rule 4455, 5.3.5]
34. For any leaking component that is an essential or critical component, and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized but still exceeds any of the applicable leak standards of this Rule, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6]
35. For any component that has incurred five repair actions for major gas leaks or major liquid leaks (any combination) within a continuous 12-month period, the operator shall as soon as practicable but not later than 12 months after the date of detection either: 1) replace or retrofit the component with the control technology specified in Table 4 of the rule, or 2) replace the component with Best Available Control Technology (BACT) equipment, as approved by the APCO, or 3) vent the component to an APCO approved closed vent system as defined in Section 3.0 of the Rule, or 4) remove the component from operation. Inaccessible components, unsafe-to-monitor components, essential components, or critical components shall satisfy the above-listed requirement as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes earlier. The APCO shall be notified in writing prior to the replacement or retrofitting of any component. [District Rule 4455, 5.3.7]

CONDITIONS CONTINUE ON NEXT PAGE

36. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1]
37. The operator shall comply with the process PRD release notification and record keeping requirements specified in Section 6.3 of the Rule. After a release from process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. [District Rule 4455, 5.4.3 and 5.4.4]
38. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and record keeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other APCO-approved system that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4455, 5.5]
39. The operator shall keep a copy of the OMP at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing approved Operator Management Plan. [District Rule 4455, 6.1.2]
40. Operator shall maintain an inspection log containing the information set forth in Sections 6.2.1.1 through 6.2.1.10 of the Rule. [District Rule 4455, 6.2.1]
41. The operator shall notify the APCO, by telephone or other APCO-approved methods, of any process PRD release in excess of 500 pounds of VOC in a continuous 24-hour period, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. The operator shall submit a written report to the APCO within thirty calendar days of following notification of process PRD release subject to 6.3.1 of the rule. The written report shall include all of the information set forth in Sections 6.3.2.1 through 6.3.2.5 of the Rule. [District Rule 4455, 6.3]
42. Measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument, calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. Operator shall keep a record of each instrument calibration in accordance with requirements as set forth Section 6.2.3 of the Rule. [District Rule 4455, 6.4]
43. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305 & 4306]
44. The duration of each startup and shutdown period for the 80 MMBtu/hr gas-fired process oil heater shall not exceed 5.5 hours and 2.0 hours respectively. Emission limits of Rules 4305 and 4306 are waived during periods of startup and shutdown. [District Rules 4305 & 4306]
45. The permittee shall maintain records of the duration of each startup period for the 80 MMBtu/hr gas-fired process oil heater. [District Rules 4305 & 4306]
46. The permittee shall monitor and record the stack concentration of NO_x (as NO₂), CO, and O₂ at least once every month using a portable emission monitor. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306]

CONDITIONS CONTINUE ON NEXT PAGE

47. If the NOx and/or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4305 and 4306]
48. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NOx and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306]
49. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
50. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
51. This unit shall be tested for compliance with the NOx, CO, and SOx emissions limits at least once every 12 months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. [District Rules 2201, 4305 and 4306]
52. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. NOx emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305 and 4306]
53. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. CO emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305 and 4306]
54. SOx emissions for source test purposes shall be determined using EPA Method 19. [District Rule 1081]
55. Stack gas oxygen for source test purposes shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306]
56. If permittee fails any compliance demonstration for NOx, CO, or SOx emission limits when testing not less than once every 36 months, compliance with NOx, CO, and SOx emission limits shall be demonstrated not less than once every 12 months. [District Rules 2201, 4305 and 4306]
57. Permittee shall maintain accurate records of perchloroethylene usage, fuel gas heating value, and daily, monthly and annual records of fuel gas use. [District Rules 1070 and 2201]
58. Permittee shall maintain accurate monthly records of the combined heat input of the fuel gas combusted in units S-71-4, '5, '14 and '15. [Districts Rule 1070 and 2201]
59. When the LPG supply source for make up fuel to the fuel gas system changes, the stack concentrations of NOx, CO, and O₂ shall be measured with a District approved portable analyzer to verify emissions compliance. This is to be done anytime that LPG is being vaporized to supply make up fuel to the fuel gas system. [District Rule 2201, 4301, 4305 and 4306]
60. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455]
61. ATC S-71-4-13 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]



AUTHORITY TO CONSTRUCT

PERMIT NO: S-71-12-7

ISSUANCE DATE: 10/11/2010

LEGAL OWNER OR OPERATOR: PLAINS LPG SERVICES, L.P.
MAILING ADDRESS: 19430 BEECH AVE
SHAFTER, CA 93263

LOCATION: 7TH STANDARD & BEECH
SHAFTER, CA 93263

SECTION: 35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

MODIFICATION OF RAILCAR LPG/NATURAL GASOLINE LOADING/UNLOADING OPERATION WITH FIFTEEN LPG/NATURAL GASOLINE LOADING/UNLOADING STATIONS INCLUDING: ELEVATED RACK SYSTEM UTILIZING HARD PIPING AND SWIVEL JOINTS; AND NITROGEN PURGE SYSTEM SERVING LIQUID LINES, COMPRESSOR SEALS, AND COMPRESSOR CRANKCASES: INCREASE FUGITIVE VOC COMPONENT COUNT, ADD COMPRESSOR AND REPLACE TWO 20 HP PUMPS WITH TWO 40 HP PUMPS

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Operation shall include 15 railcar loading/unloading stations each equipped with two (2) liquid lines and one (1) vapor return line for a total of 45 loading arms with 225 swivel joints. [District Rule 2201]
3. The nitrogen purge system serving the liquid lines shall be a closed loop system and shall not vent to the atmosphere during operation of the system. [District Rule 2201]
4. The nitrogen purge system serving the compressor seals and compressor crankcases shall vent through two activated charcoal canisters connected in series, except during scheduled maintenance or repair activities. During repair and maintenance (such as charcoal bed change out) VOC emissions shall be minimized to the fullest extent possible. [District Rule 2201]
5. The nitrogen purge system's used activated charcoal canisters shall be handled and disposed of in sealed containers, preventing VOC emissions to the fullest extent possible. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

6. The nitrogen purge system's activated charcoal canisters shall be replaced to maintain the VOC concentration from the canister vent less than 4,500 ppmv-VOC or periodically as recommended by the manufacturer, whichever occurs first. [District Rule 2201]
7. Operation shall include three vapor compressors equipped with knock-out vessels and not exceeding 100 hp each, three compressor knock-out drum pumps, and five turbine pumps. [District Rule 2201]
8. Fugitive VOC emissions from valves, flanges, connectors, pump seals, and other fugitive components associated with this permit unit shall not exceed 71.88 lb/day. [District Rule 2201]
9. Maximum VOC emissions from railcar loading/unloading (vapor and liquid losses combined) operation shall not exceed 2.3 lb/day. [District Rule 2201]
10. The permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated using "California Implementation Guidelines for estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Oil and Gas Production Operations Screening Value Ranges Emission Factors Table IV-2c Feb 1999. [District Rule 2201]
11. The permittee shall comply with all inspection, maintenance, testing, and recordkeeping requirements of Rules 4624 for the organic liquid loading operation. [District Rule 4624]
12. The loading racks shall be equipped with a vapor return system consisting of vapor and condensate collection systems capable of reducing VOC emissions by at least 95%. [District Rule 2201]
13. There shall be no more than 120 liquid hose connects/disconnects in any one day. [District Rule 2201]
14. There shall be no more than 60 vapor hose connect/disconnect in any one day. [District Rule 2201]
15. Permittee shall keep accurate records of railcar loadings/unloadings, connects/disconnects, and liquid types. [District Rule 1070]
16. Records required by this permit shall be retained on site for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 1070]
17. The operator shall meet operating, inspection and re-inspection, maintenance, process pressure relief device (PRD) and component identification requirements of District Rule 4455 (4/20/05) for all components containing or contacting VOC, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455, 5.0]
18. Except as follows, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rules 2201 and 4455]
19. The operator shall not use any component that leaks in excess of the allowable leak standards, except as follows. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the Rule. [District Rule 4455, 5.1.1]
20. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2]
21. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be re-inspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the Rule. [District Rule 4455, 5.2.1 and 5.2.2]

CONDITIONS CONTINUE ON NEXT PAGE

22. The operator shall inspect all components at least once every calendar quarter. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5 through 5.2.7. Components shall be inspected using EPA Method 21. [District Rule 4455, 5.2.3, 5.2.4, 5.25, 5.26, and 5.27]
23. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs, which shall continue to be inspected on a quarterly basis. [District Rule 4455]
24. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the Rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this Rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 and 5.2.10]
25. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11]
26. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12]
27. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of this Rule. [District Rule 4455, 5.3.1 and 5.3.2]
28. The tag shall include date and time of leak detection, date and time of leak measurement, indicate the leak concentration in ppmv (gas leaks), indicate whether it is a major or a minor leak (liquid leaks) and whether the leaking component is an essential component, unsafe-to-monitor component or critical component. [District Rule 4455, 5.3.3]
29. All component leaks shall be immediately minimized to the extent possible, but not later than one hour after detection of leaks, in order to stop or reduce leakage to the atmosphere. As soon as practicable but not later than the time period specified in Table 3 of the Rule, components that have been identified as leaking and have had emissions minimized to the extent possible but do not meet the applicable leak standards of the Rule shall either be: 1) repaired or replaced, or 2) vented to a closed vent system, or 3) removed from operation. [District Rule 4455, 5.3.5]
30. For any leaking component that is an essential or critical component, and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized but still exceeds any of the applicable leak standards of this Rule, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6]
31. For any component that has incurred five repair actions for major gas leaks or major liquid leaks (any combination) within a continuous 12-month period, the operator shall as soon as practicable but not later than 12 months after the date of detection either: 1) replace or retrofit the component with the control technology specified in Table 4 of the rule, or 2) replace the component with Best Available Control Technology (BACT) equipment, as approved by the APCO, or 3) vent the component to an APCO approved closed vent system as defined in Section 3.0 of the Rule, or 4) remove the component from operation. Inaccessible components, unsafe-to-monitor components, essential components, or critical components shall satisfy the above-listed requirement as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes earlier. The APCO shall be notified in writing prior to the replacement or retrofitting of any component. [District Rule 4455, 5.3.7]

CONDITIONS CONTINUE ON NEXT PAGE

32. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1]
33. The operator shall comply with the process PRD release notification and record keeping requirements specified in Section 6.3 of the Rule. After a release from process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. [District Rule 4455, 5.4.3 and 5.4.4]
34. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and record keeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other APCO-approved system that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4455, 5.5]
35. The operator shall keep a copy of the OMP at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing approved Operator Management Plan. [District Rule 4455, 6.1.2]
36. Operator shall maintain an inspection log containing the information set forth in Sections 6.2.1.1 through 6.2.1.10 of the Rule. [District Rule 4455, 6.2.1]
37. The operator shall notify the APCO, by telephone or other APCO-approved methods, of any process PRD release in excess of 500 pounds of VOC in a continuous 24-hour period, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. The operator shall submit a written report to the APCO within thirty calendar days of following notification of process PRD release subject to 6.3.1 of the rule. The written report shall include all of the information set forth in Sections 6.3.2.1 through 6.3.2.5 of the Rule. [District Rule 4455, 6.3]
38. Measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument, calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. Operator shall keep a record of each instrument calibration in accordance with requirements as set forth Section 6.2.3 of the Rule. [District Rule 4455, 6.4]
39. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455]



AUTHORITY TO CONSTRUCT

PERMIT NO: S-71-14-11

ISSUANCE DATE: 10/11/2010

LEGAL OWNER OR OPERATOR: PLAINS LPG SERVICES, L.P.

MAILING ADDRESS: 19430 BEECH AVE
SHAFTER, CA 93263

LOCATION: 7TH STANDARD & BEECH
SHAFTER, CA 93263

SECTION: SW35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

MODIFICATION OF BUTAMER-BUTANE ISOMERIZATION UNIT #2 WITH 105 MMBTU/HR GAS-FIRED HOT OIL HEATER H-202 EQUIPPED WITH CALLIDUS MODEL CUBR-12W LOW-NOX BURNERS AND INTERNAL FGR, WITH NITROGEN PURGE SYSTEM SERVING COMPRESSOR SEALS AND COMPRESSOR CRANKCASES: DECREASE FUGITIVE VOC COMPONENT COUNT

CONDITIONS

1. Operation shall include deisobutanizer tower T-202, stabilizer tower V-503, caustic scrubber tower V-110A, two butamer reactor vessels V-501 A/B, stabilizer receiver vessel V-502, and deisobutanizer overhead accumulator vessel V-203. [District Rule 2201]
2. Operation shall include seventeen shell & tube heat exchangers, four air-cooled heat exchangers, 350 hp recycle gas compressor C-401, and 20 hp emergency vent drum vapor compressor C-501. [District Rule 2201]
3. Perchloroethylene shall be received, stored, and transferred using a pressurized and/or enclosed system shared with permit unit #S-71-4. [District Rule 2201]
4. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201]
5. Fuel gas combusted in fired equipment may be comprised of process off-gas (including hydrogen), propane, butane, natural gas, or any combination thereof. [District Rule 2201]
6. The heating value of the fuel gas (Btu/scf @ the hhv) combusted in fired equipment shall be determined by sample analysis at least annually. Results of sample analysis shall be retained on site and made available for District inspection upon request. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

7. Total heat input of fuel gas combusted in units S-71-4, '5, '14 and '15 shall not exceed 1,602,019 MMBtu/yr. [District Rule 2201]
8. The nitrogen purge system serving the liquid lines shall be a closed loop system and shall not vent to the atmosphere during operation of the system. [District Rule 2201]
9. The nitrogen purge system serving the compressor seals and compressor crankcases shall vent through two activated charcoal canisters connected in series, except during scheduled maintenance or repair activities. During repair and maintenance (such as charcoal bed change out) VOC emissions shall be minimized to the fullest extent possible. [District Rule 2201]
10. The nitrogen purge system's used activated charcoal canisters shall be handled and disposed of in sealed containers, preventing VOC emissions to the fullest extent possible. [District Rule 2201]
11. The nitrogen purge system's activated charcoal canisters shall be replaced to maintain the VOC concentration from the canister vent less than 4,500 ppmv-VOC or periodically as recommended by the manufacturer, whichever occurs first. [District Rule 2201]
12. Maximum fugitive VOC emissions from permits #S-71-14 and '-15 shall not exceed 59.74 lb per day. [District Rule 2201]
13. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201]
14. Emission rates shall not exceed any of the following: PM10: 0.0137 lb/MMBtu; NOx (as NO2): 25 ppmv @ 3% O2; SOx (as SO2): 0.0006 lb MMBtu; VOC: 0.00141 lb/MMBtu; or CO: 50 ppmv @ 3% O2. [District Rule 2201]
15. Process oil heater stack shall be equipped with sampling facilities for source testing in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]
16. The stack concentration of NOx (as NO2), CO, and O2 shall be measured at least on a monthly basis using District approved portable analyzers. [District Rules 4305 and 4306]
17. The permittee shall maintain records of the date and time of NOx, CO, and O2 measurements, the measured NO2 and CO concentrations corrected to 3% O2, and the O2 concentration. The records shall also include a description of any corrective action taken to maintain the emissions in the acceptable range. These records shall be retained at the facility for a period of no less than five years and shall be made readily available for District inspection upon request. [District Rules 1070, 4305 and 4306]
18. If the NOx and/or CO concentrations, as measured by the portable analyzer, exceed the permitted emission limits, the permittee or third party shall notify the District and return the NOx and CO concentrations to the permitted emission limits as soon as possible but no longer than one (1) hour after detection. If the portable analyzer readings continue to exceed the permitted emission limits after (1) hour, the permittee shall conduct a source test within 60 days, of the first exceedance to demonstrate compliance with the permitted emission limits. [District Rules 4305 and 4306]
19. District witnessed compliance source testing for NOx, CO, and SOx emission limits shall be conducted at least once every 12 months, except as provided below. [District Rules 2201, 4305 and 4306]
20. District witnessed source testing to demonstrate compliance with NOx, CO, and SOx emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rules 2201, 4305 and 4306]
21. If permittee fails any compliance demonstration for NOx, CO, or SOx emission limits when testing not less than once every 36 months, compliance with NOx, CO, and SOx emission limits shall be demonstrated not less than once every 12 months. [District Rules 2201, 4305 and 4306]
22. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081]

CONDITIONS CONTINUE ON NEXT PAGE

23. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]
24. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
25. For the purposes of source testing, the following test methods shall be used: NO_x (ppmv) - EPA Method 7E or ARB Method 100, CO (ppmv) - EPA Method 10 or ARB Method 100, SO_x (lb/MMBtu) - EPA Method 19, and stack gas oxygen - EPA Method 3 or 3A or ARB Method 100. [District Rules 1081, 4305 and 4306]
26. When the LPG supply source for make up fuel to the fuel gas system changes, the stack concentrations of NO_x, CO, and O₂ shall be measured with a District approved portable analyzer to verify emissions compliance. This is to be done anytime that LPG is being vaporized to supply make up fuel to the fuel gas system. [District Rule 2201, 4301, 4305 and 4306]
27. Permittee shall maintain accurate records of perchloroethylene usage, fuel gas heating value and daily, monthly and yearly records of fuel gas use. [District Rules 1070 and 2201]
28. Permittee shall maintain accurate monthly records of the combined fuel gas combusted in units S-71-4, '5, '14 and '15. [District Rules 1070 and 2201]
29. The operator shall meet operating, inspection and re-inspection, maintenance, process pressure relief device (PRD) and component identification requirements of District Rule 4455 (4/20/05) for all components containing or contacting VOC, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455, 5.0]
30. Except as follows, a component shall be considered leaking if one or more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rules 2201 and 4455]
31. The operator shall not use any component that leaks in excess of the allowable leak standards, except as follows. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the Rule. [District Rule 4455, 5.1.1]
32. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2]
33. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be re-inspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the Rule. [District Rule 4455, 5.2.1 and 5.2.2]
34. The operator shall inspect all components at least once every calendar quarter. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5 through 5.2.7. Components shall be inspected using EPA Method 21. [District Rule 4455, 5.2.3, 5.2.4, 5.25, 5.26, and 5.27]
35. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs, which shall continue to be inspected on a quarterly basis. [District Rule 4455]

CONDITIONS CONTINUE ON NEXT PAGE

36. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the Rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this Rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 and 5.2.10]
37. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11]
38. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12]
39. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of this Rule. [District Rule 4455, 5.3.1 and 5.3.2]
40. The tag shall include date and time of leak detection, date and time of leak measurement, indicate the leak concentration in ppmv (gas leaks), indicate whether it is a major or a minor leak (liquid leaks) and whether the leaking component is an essential component, unsafe-to-monitor component or critical component. [District Rule 4455, 5.3.3]
41. All component leaks shall be immediately minimized to the extent possible, but not later than one hour after detection of leaks, in order to stop or reduce leakage to the atmosphere. As soon as practicable but not later than the time period specified in Table 3 of the Rule, components that have been identified as leaking and have had emissions minimized to the extent possible but do not meet the applicable leak standards of the Rule shall either be: 1) repaired or replaced, or 2) vented to a closed vent system, or 3) removed from operation. [District Rule 4455, 5.3.5]
42. For any leaking component that is an essential or critical component, and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized but still exceeds any of the applicable leak standards of this Rule, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6]
43. For any component that has incurred five repair actions for major gas leaks or major liquid leaks (any combination) within a continuous 12-month period, the operator shall as soon as practicable but not later than 12 months after the date of detection either: 1) replace or retrofit the component with the control technology specified in Table 4 of the rule, or 2) replace the component with Best Available Control Technology (BACT) equipment, as approved by the APCO, or 3) vent the component to an APCO approved closed vent system as defined in Section 3.0 of the Rule, or 4) remove the component from operation. Inaccessible components, unsafe-to-monitor components, essential components, or critical components shall satisfy the above-listed requirement as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes earlier. The APCO shall be notified in writing prior to the replacement or retrofitting of any component. [District Rule 4455, 5.3.7]
44. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1]
45. The operator shall comply with the process PRD release notification and record keeping requirements specified in Section 6.3 of the Rule. After a release from process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. [District Rule 4455, 5.4.3 and 5.4.4]

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46. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and record keeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other APCO-approved system that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4455, 5.5]
47. The operator shall keep a copy of the OMP at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing approved Operator Management Plan. [District Rule 4455, 6.1.2]
48. Operator shall maintain an inspection log containing the information set forth in Sections 6.2.1.1 through 6.2.1.10 of the Rule. [District Rule 4455, 6.2.1]
49. The operator shall notify the APCO, by telephone or other APCO-approved methods, of any process PRD release in excess of 500 pounds of VOC in a continuous 24-hour period, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. The operator shall submit a written report to the APCO within thirty calendar days of following notification of process PRD release subject to 6.3.1 of the rule. The written report shall include all of the information set forth in Sections 6.3.2.1 through 6.3.2.5 of the Rule. [District Rule 4455, 6.3]
50. Measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument, calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. Operator shall keep a record of each instrument calibration in accordance with requirements as set forth Section 6.2.3 of the Rule. [District Rule 4455, 6.4]
51. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455]
52. ATC S-71-14-10 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]



AUTHORITY TO CONSTRUCT

PERMIT NO: S-71-15-9

ISSUANCE DATE: 10/11/2010

LEGAL OWNER OR OPERATOR: PLAINS LPG SERVICES, L.P.

MAILING ADDRESS: 19430 BEECH AVE
SHAFTER, CA 93263

LOCATION: 7TH STANDARD & BEECH
SHAFTER, CA 93263

SECTION: SW35 **TOWNSHIP:** 28S **RANGE:** 25E

EQUIPMENT DESCRIPTION:

MODIFICATION OF SAFECAT FEEDSTOCK TREATMENT UNIT WITH 23 MMBTU/HR GAS-FIRED HEATER H-401 EQUIPPED WITH CALLIDUS MODEL CUBR-8P LOW-NOX BURNERS AND INTERNAL FGR: DECREASE FUGITIVE VOC COMPONENT COUNT

CONDITIONS

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]
2. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of fuel gas combusted in the unit shall be installed, utilized and maintained. [District Rule 2201]
3. Operation shall include SafeCat feed surge drum V-401, SafeCat reactor vessel V-402, SafeCat product separator vessel V-403, depropanizer receiver boot V-7, sulfur injection drum V-407, and three SafeCat adsorber vessels V-405 A/B/C. [District Rule 2201]
4. Operation shall include two SulfaTreat adsorber vessels V-102 A/B, SafeCat Feed prefilter vessel F-401, five shell & tube heat exchangers, and air-cooled heat exchanger. [District Rule 2201]
5. SafeCat feedstock treatment system gas shall be routed only to SafeCat feed stream or SulfaTreat sulfur removal equipment prior to introduction into facility fuel gas system. [District Rule 2201]
6. No on-site regeneration of SulfaTreat chemical is authorized. [District Rule 2201]
7. Gas combusted in fired equipment may be comprised of process off-gas (including hydrogen), propane, butane, natural gas, or any combination thereof. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

8. The heating value of the fuel gas (Btu/scf @ the hhv) combusted in fired equipment shall be determined by sample analysis at least annually. Results of sample analysis shall be retained on site and made available for District inspection upon request. [District Rule 2201]
9. Total heat input of fuel gas combusted in units S-71-4, '5, '14 and '15 shall not exceed 1,602,019 MM Btu/yr. [District Rule 2201]
10. Leaks from valves, connectors, and other components (not including pump and compressor seals) subject to a BACT requirement and subject to the provisions of Rule 4455 shall be defined as a reading of methane on a portable hydrocarbon detection instrument in excess of 100 ppmv above background when measured as close as possible but not greater than one (1) cm from the potential source. [District Rule 2201]
11. Leaks from pump and compressor seals subject to a BACT requirement and subject to the provisions of Rule 4455 shall be defined as a reading of methane on a portable hydrocarbon detection instrument in excess of 500 ppmv above background when measured as close as possible but not greater than one (1) cm from potential source. [District Rule 2201]
12. Maximum fugitive VOC emissions from permits #S-71-14 and '-15 shall not exceed 59.74 lb per day. [District Rule 2201]
13. Permittee shall maintain permit accurate fugitive component counts and resulting emissions calculated using CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," February 1999, Table IV-2c: CAPCOA Oil and Gas Production Screening Value Range Emission Factors. [District Rule 2201]
14. Emission rates shall not exceed any of the following: PM10: 0.0137 lb/MMBtu; NOx (as NO2): 25 ppmv @ 3% O2; SOx (as SO2): 0.0006 lb MMBtu; VOC: 0.00279 lb/MMBtu; or CO: 50 ppmv @ 3% O2. [District Rule 2201]
15. SafeCat heater stack shall be equipped with sampling facilities for source testing in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]
16. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during startup and shutdown. [District Rules 4305 & 4306]
17. The duration of each startup and shutdown period for the 23 MMBtu/hr gas-fired heater shall not exceed 7.7 hours and 2.0 hours respectively. Emission limits of Rules 4305 and 4306 are waived during periods of startup and shutdown. [District Rules 4305 & 4306]
18. The permittee shall maintain records of the duration of each startup period for the 23 MMBtu/hr gas-fired heater. [District Rules 4305 & 4306]
19. The permittee shall monitor and record the stack concentration of NOx (as NO2), CO, and O2 at least once every month using a portable emission monitor. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306]
20. If the NOx and/or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rules 4305 and 4306]
21. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306]

CONDITIONS CONTINUE ON NEXT PAGE

22. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081]
23. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
24. This unit shall be tested for compliance with the NO_x, CO, and SO_x emissions limits at least once every 12 months. After demonstrating compliance on two consecutive annual source tests, the unit shall be tested not less than once every thirty-six months. [District Rules 2201, 4305 and 4306]
25. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. NO_x emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305 and 4306]
26. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. CO emissions during the source test shall be calculated as the arithmetic average of three 30-consecutive-minute test runs. [District Rules 4305 and 4306]
27. SO_x emissions for source test purposes shall be determined using EPA Method 19. [District Rule 1081]
28. Stack gas oxygen for source test purposes shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306]
29. If permittee fails any compliance demonstration for NO_x, CO, or SO_x emission limits when testing not less than once every 36 months, compliance with NO_x, CO, and SO_x emission limits shall be demonstrated not less than once every 12 months. [District Rules 2201, 4305 and 4306]
30. When the LPG supply source for make up fuel to the fuel gas system changes, the stack concentrations of NO_x, CO, and O₂ shall be measured with a District approved portable analyzer to verify emissions compliance. This is to be done anytime that LPG is being vaporized to supply make up fuel to the fuel gas system. [District Rule 2201, 4301, 4305 and 4306]
31. Permittee shall maintain accurate records of perchloroethylene usage, fuel gas heat input, and daily, monthly and yearly records of fuel gas use. [District Rules 1070 and 2201]
32. Permittee shall maintain accurate monthly records of the combined heat input of the fuel gas combusted in units S-71-4, '5, '14 and '15. [District Rules 1070 and 2201]
33. The operator shall meet operating, inspection and re-inspection, maintenance, process pressure relief device (PRD) and component identification requirements of District Rule 4455 (4/20/05) for all components containing or contacting VOC, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rule 4455, 5.0]
34. Except as follows, a component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. For valves and connectors, a leak shall be defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455. For pump and compressor seals, a leak shall be defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455. [District Rules 2201 and 4455]
35. The operator shall not use any component that leaks in excess of the allowable leak standards, except as follows. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the Rule. [District Rule 4455, 5.1.1]
36. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2]
37. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be re-inspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the Rule. [District Rule 4455, 5.2.1 and 5.2.2]

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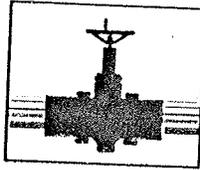
38. The operator shall inspect all components at least once every calendar quarter. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5 through 5.2.7. Components shall be inspected using EPA Method 21. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6, and 5.2.7]
39. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs, which shall continue to be inspected on a quarterly basis. [District Rule 4455]
40. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the Rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this Rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 and 5.2.10]
41. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11]
42. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12]
43. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of this Rule. [District Rule 4455, 5.3.1 and 5.3.2]
44. The tag shall include date and time of leak detection, date and time of leak measurement, indicate the leak concentration in ppmv (gas leaks), indicate whether it is a major or a minor leak (liquid leaks) and whether the leaking component is an essential component, unsafe-to-monitor component or critical component. [District Rule 4455, 5.3.3]
45. All component leaks shall be immediately minimized to the extent possible, but not later than one hour after detection of leaks, in order to stop or reduce leakage to the atmosphere. As soon as practicable but not later than the time period specified in Table 3 of the Rule, components that have been identified as leaking and have had emissions minimized to the extent possible but do not meet the applicable leak standards of the Rule shall either be: 1) repaired or replaced, or 2) vented to a closed vent system, or 3) removed from operation. [District Rule 4455, 5.3.5]
46. For any leaking component that is an essential or critical component, and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized but still exceeds any of the applicable leak standards of this Rule, the operator shall repair or replace the component to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6]
47. For any component that has incurred five repair actions for major gas leaks or major liquid leaks (any combination) within a continuous 12-month period, the operator shall as soon as practicable but not later than 12 months after the date of detection either: 1) replace or retrofit the component with the control technology specified in Table 4 of the rule, or 2) replace the component with Best Available Control Technology (BACT) equipment, as approved by the APCO, or 3) vent the component to an APCO approved closed vent system as defined in Section 3.0 of the Rule, or 4) remove the component from operation. Inaccessible components, unsafe-to-monitor components, essential components, or critical components shall satisfy the above-listed requirement as soon as practicable but not later than the next turnaround or not later than two years after the date of detection of the fifth major leak within a continuous 12-month period, whichever comes earlier. The APCO shall be notified in writing prior to the replacement or retrofitting of any component. [District Rule 4455, 5.3.7]

CONDITIONS CONTINUE ON NEXT PAGE

48. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1]
49. The operator shall comply with the process PRD release notification and record keeping requirements specified in Section 6.3 of the Rule. After a release from process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. [District Rule 4455, 5.4.3 and 5.4.4]
50. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and record keeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other APCO-approved system that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. [District Rule 4455, 5.5]
51. The operator shall keep a copy of the OMP at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing approved Operator Management Plan. [District Rule 4455, 6.1.2]
52. Operator shall maintain an inspection log containing the information set forth in Sections 6.2.1.1 through 6.2.1.10 of the Rule. [District Rule 4455, 6.2.1]
53. The operator shall notify the APCO, by telephone or other APCO-approved methods, of any process PRD release in excess of 500 pounds of VOC in a continuous 24-hour period, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. The operator shall submit a written report to the APCO within thirty calendar days of following notification of process PRD release subject to 6.3.1 of the rule. The written report shall include all of the information set forth in Sections 6.3.2.1 through 6.3.2.5 of the Rule. [District Rule 4455, 6.3]
54. Measurements of gaseous leak concentrations shall be conducted according to EPA Method 21 using an appropriate portable hydrocarbon detection instrument, calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. Operator shall keep a record of each instrument calibration in accordance with requirements as set forth Section 6.2.3 of the Rule. [District Rule 4455, 6.4]
55. All records required by this permit shall be retained for a period of at least 5 years and shall be made available to the District, ARB, and USEPA upon request. [District Rules 1070 and 4455]
56. ATC S-71-15-8 shall be implemented prior to or concurrently with this ATC. [District Rule 2201]

ATTACHMENT D

Application



PLAINS
LPG Services, L.P.

RECEIVED

SEP 25 2013

SJVAPCD
Southern Region

September 23, 2013

Mr. Leonard Scandura
Permit Services Manager, SJVAPCD
34946 Flyover Ct.
Bakersfield, CA 93308

**Subject: Title V Minor Modification Application
Facility ID: S-71**

Dear Mr. Scandura:

Attached is a check for \$95 and an application for Title V Minor Modification to implement five Authorities to Construct (ATC) into the existing Plains LPG Services, L.P. (Plains) Shafter facility.

If you have any questions or need further information, please feel free to call Glen Mears at (661) 589-5377 or Joe Selgrath at (661) 377-0073.

Sincerely,

Tommy Coffey Jr.
Manager

cc: Joe Selgrath -- EnviroTech Consultants, Inc.

RECEIVED

SEP 25 2013

SJVAPCD
Southern Region

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

SIGNIFICANT PERMIT MODIFICATION
 MINOR PERMIT MODIFICATION

ADMINISTRATIVE
AMENDMENT

COMPANY NAME: PLAINS LPG SERVICES, L.P.	FACILITY ID: S-71
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: PLAINS LPG SERVICES, L.P.	
3. Agent to the Owner: TOMMY COFFEY	

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

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

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



Signature of Responsible Official

9-24-13

Date

TOMMY COFFEY

Name of Responsible Official (please print)

MANAGER

Title of Responsible Official (please print)

San Joaquin Valley Air Pollution Control District

www.valleyair.org

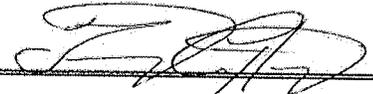
RECEIVED

SEP 25 2013

Permit Application For:

SJVAPCD
Southern Region

[] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">PLAINS LPG SERVICES, L.P.</p>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>19430 BEECH AVE</u> CITY: <u>SHAFTER</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93263</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>19430 BEECH AVE</u> CITY: <u>SHAFTER</u> <u>SW</u> ¼ SECTION <u>35</u> TOWNSHIP <u>28S</u> RANGE <u>25E</u>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <u>GAS PROCESSING</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) IMPLEMENTATION OF THE FOLLOWING ATCS INTO THE FACILITY TITLE V PERMIT: S-71-2-10 S-71-4-14 S-71-12-7 S-71-14-11 S-71-15-9	
6. TYPE OR PRINT NAME OF APPLICANT: <p style="text-align: center;">TOMMY COFFEY</p>	TITLE OF APPLICANT: MANAGER
7. SIGNATURE OF APPLICANT: 	DATE: <u>9-24-13</u> PHONE: (661) 589-5377 FAX: (661) 746-4037 EMAIL: GAMears@paalp.com

For APCD Use Only:

EnviroTech Consult-

DATE STAMP	FILING FEE RECEIVED: \$ <u>95-</u> CHECK#: <u>4101</u> DATE PAID: <u>PM 9/25/13</u> PROJECT NO: <u>S1133764</u> FACILITY ID: <u>S-71</u>
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