

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 15	PAGE 1
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	PROCESSED BY: Cynthia Carter	CHECKED BY

**PERMIT TO OPERATE
MODIFICATION**

COMPANY NAME, LOCATION ADDRESS:

Phillips 66, Facility ID 171107
1660 W. Anaheim Street
Wilmington, CA 90744

EQUIPMENT DESCRIPTION:

Additions or modifications to the equipment description are underlined and **bolded**. New and modified conditions are underlined and **bolded**. Deletions to the equipment description and conditions are noted in ~~strikeouts~~.

Section D of Phillips 66 Facility Permit, ID# 171107

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 13: STORAGE TANKS					P13.1, P13.2
System 3: EXTERNAL FLOATING ROOF TANKS					S13.8
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 3, NAPHTHA, LIGHT CATALYTICALLY CRACKED GASOLINE RECOVERED OIL 41000 BBL; DIAMETER: 95 FT 6 IN; HEIGHT: 32 FT WITH A/N: 326345 542089 FLOATING ROOF, DOUBLE DECK, WELDED SHELL PRIMARY SEAL, CATEGORY A, METALLIC SHOE SECONDARY SEAL, CATEGORY B OR BETTER PER RULE 219(C)(4), WIPER TYPE	D586			HAP: (10) [40CFR 63 Subpart CC, #3A, 5-25- 2001]	B22.6, C1.14, <u>C1.88,</u> H23.15, <u>K67.7</u>

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CONDITIONS:

The following permit conditions shall apply to the subject equipment in order to comply with all applicable District, State, and Federal standards. Additions and deletions to the conditions are noted in underlines and strikeouts, respectively.

PROCESS CONDITIONS

P13.1 All devices under this process are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	463

[RULE 463, 3-11-1994; RULE 463, 5-6-2005]

[Processes subject to this condition: 13]

P13.2 All devices under this process are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
HAPs	40CFR61, SUBPART	FF

[40CFR 61 Subpart FF, 12-4-2003]

[Processes subject to this condition: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 18]

SYSTEM CONDITIONS

S13.8 All devices under this system are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	463
VOC	District Rule	1178
VOC	District Rule	1149

For Rule 463 applicability, only subdivision (d) in the March 11, 1994 amendment, or equivalent requirements in the future amendments, shall apply to domed external floating roof tanks. This does not preclude any requirements specified in Rule 1178.

[RULE 1149, 7-14-1995, RULE 1149, 5-2-2008; RULE 1178, 4-7-2006; RULE 463, 5-6-2005]

[Systems subject to this condition: Process 13, System 3, 8]

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DEVICE CONDITIONS

B22.6 The operator shall not use this equipment with materials having a(n) true vapor pressure of 3 psia or greater under actual operating conditions.

The operator shall determine the true vapor pressure in accordance with Test Methods and Procedures specified in Rule 1178.

[RULE 1178, 4-7-2006; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

Note: Added Condition B22.6 to comply with R1178's 3.0 VP requirement

~~C1.14 The operator shall limit the number of turnovers to no more than 6 in any one year.~~

~~[RULE 1301(b)(1), 12-7-1995]~~

~~[Devices subject to this condition: D586]~~

Note: Condition C1.88 replaces this condition. The monthly limit (when multiplied by 12) is equivalent to a yearly condition.

C1.88 The operator shall limit the throughput to no more than 861,000 gallons per calendar month:

The operator shall comply with the following throughput measurement practices.

The operator shall calculate the throughput, in barrels, by the following equation: $0.14 \times d \times d \times l$, where d is the diameter of the tank in feet based on the tank strapping chart and l is the total vertical one-way roof travel in feet per month.

The operator shall install and maintain an automatic tank level gauge (ATLG) and recorder to continuously record the vertical movement of the roof. For the purpose of this condition, continuous recording is defined as once per hour.

The operator shall calculate the total one-way roof movement, in feet, on a daily and monthly basis.

The ATLG installed shall be verified once per quarter by comparing against a manual tank level measurement. If the ATLG differs from the manual tank level measurement by more than 1.0 inch or 0.8%, whichever is greater, the ATLG shall be repaired and put back into service within 10 days. While the ATLG is being repaired, the throughput shall be determined by the hourly tank level data averaged from the previous 30 days prior to the discovery of the discrepancy.

In the event of a failure or routine maintenance of the ATLG, the ATLG shall be repaired (if necessary) and put back into service within 10 days of the time that the ATLG failed or was removed from service for maintenance. While the ATLG is being repaired or maintained, the throughput shall be determined by the hourly tank level data averaged from the previous 30 days prior to time that the ATLG went out of service.

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The operator shall keep adequate records to show compliance with the limitations specified in this permit. Such records shall be maintained and kept on file for at least five years and shall be made available to the Executive Officer or his authorized representative upon request.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition: D586]

Note: Added monthly limit based on R1313(g)

H23.15 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR 60, Subpart	Kb

[40CFR 60 Subpart Kb, 10-15-2003]

[Devices subject to this condition : D516, D517, D575, D576, D584, D586, D615]

K67.7 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Throughput and vapor pressure of stored liquid.

[RULE 1178, 4-7-2006; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 463, 5-6-2005]

[Devices subject to this condition: D356, D357, D358, D359, D360, D361, D362, D363, D364, D370, D371, D531, D535, D536, D537, D543, D544, D550, D551, D553, D554, D556, D557, D558, D559, D560, D561, D563, D564, D566, D567, D568, D569, D570, D572, D573, D574, D575, D576, D577, D578, D579, D583, D587, **D586**, D588, D589, D591, D592, D593, D594, D595, D596, D597, D598, D599, D600, D601, D604, D605, D606, D607, D609, D611, D612, D613, D614, D615, D616, D617, D619, D621, D622, D623, D624, D625, D626, D627, D628, D629, D630, D631, D632, D633, D634, D635, D636, D637, D638]

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BACKGROUND:

Phillips 66 Los Angeles Refinery operates a refinery as two separate locations in the city of Carson and Wilmington. At the Carson Plant crude oil is processed in the crude unit where it is heated and distilled into various hydrocarbon components which are further processed downstream at the Wilmington Plant. The Wilmington Plant is a major producer of fuel products, including gasoline for Southern California. This evaluation is for the Wilmington Plant where it is part of the NO_x and SO_x RECLAIM Program. In addition, Wilmington’s initial Federal Title V permit was issued on July 1, 2009.

This evaluation covers an application to change the tank’s commodity. The submitted applications are listed in Table 1. Currently, what is listed in permit is “naphtha, light catalytically cracked gasoline”, but sometime after the mid-1990s, Tank 3 has been used for storing recovered oil. No physical changes have been made to the tank.

Because of the change of ownership on June 12, 2012, Phillips 66 resubmitted new applications to continue working on this permit change. A/N 500151 and 500152 under ConocoPhillips have been canceled.

Table 1- Submitted Applications

A/N	Date Received	Equipment	Device ID	Requested Action	Previous A/N
542089	08/16/12	Storage Tank	D586	• Change listed commodity	326346
542090	08/16/12	Facility Permit Amendment	--	• Update Facility Permit	--

COMPLIANCE RECORD REVIEW:

As of September 26, 2013, a check of the AQMD Compliance Database for the past year (Phillips 66 Change of Ownership started May 2012) showed that this facility was issued 2 Notices of Violations (NOVs) and 1 Notice to Comply (NCs). The violations are still outstanding, but none of the violations are related to the subject equipment.

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FEE EVALUATION:

The fees paid for the applications submitted are as follows:

Table 2-Application Fees Submitted

A/N	Equipment	BCAT/ CCAT	Type	Status	Fee Schedule FY 12-13	Fee Required, \$	Fees Paid, \$
542089	Storage Tank	248904	50	20	C	\$3,440.06	\$3,440.06
	PO no PC penalty					\$1,720.03	\$1,720.03
542090	Title V Facility Permit Amendment	555099	85	21	--	\$1,789.12	\$1,789.12
Total:						\$6,949.12	\$6,949.12
Net Fee Due:							\$0.00

PERMIT HISTORY:

The following table lists the permitting history for the subject tank. This tank is considered to be **post-NSR^a**

Table 3- Permit History for Tank No. 3 (D586)

Permit to Construct		Permit to Operate		Description of Modification
A/N	Issue Date	A/N	Issue Date	
--	--	295334	2/18/1997	<ul style="list-style-type: none"> • Primary Seal replacement • Secondary seal installation
--	--	13937		<ul style="list-style-type: none"> • No records where found

PROCESS DESCRIPTION:

Tank No. 3 is an external floating roof with a primary seal and a wiper type as its secondary seal. The tank is used to store recovered oil with a maximum vapor pressure of 3 psia

The normal operating schedule is 24 hours per day, 7 days per week, and 52 weeks per year.

^a According to the facility, the tank went through NSR under A/N 295334. A check of our records do not show any history of a SCAQMD evaluation.

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EMISSIONS:

Emissions were previously calculated with naphtha with a TVP of 3.04psia and 6 turnovers/yr. The emissions estimate for recovered oil is based on slightly lower than 3psia with 6 turnovers/yr. The emissions were calculated using EPA Tanks 4.0.9d program. The input parameters was with an external floating roof at its maximum rated capacity of 41,000 bbls and 6 turnovers, and using recovered oil as its commodity. Therefore, there is a decrease in emissions. Refer to [Attachment A](#) for the detailed emissions report from the EPA Tank 4.0.9d program for the tank.

Table 3 shows a summary of the affected permit units' pre and post modifications emissions with a decrease of VOC of 15.65 lb/day.

Table 3: Pre and Post-Modification VOC Emissions

A/N	Equipment	VOC Emissions					
		Pre-Modification (for A/N 295334) ^b		Post-Modification (for A/N 542089)		Change from Pre-Modification and Post-Modification	
		<i>lb/yr</i>	<i>lb/day (30-day avg)</i>	<i>lb/yr</i>	<i>lb/day (30-day avg)</i>	<i>lb/yr</i>	<i>lb/day</i>
542089	Tank No. 3	7,464.2	20.4	1,708.32	4.75	(5,755.88)	(15.65)

^b Previous appl (PO no PC)

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RULES EVALUATION:

PART 1 STATE REGULATIONS

California Environmental Quality Act (CEQA)	
	<p>CEQA requires that the environmental impacts of proposed projects be evaluated and that feasible methods to reduce, avoid or eliminate identified significant adverse impacts of these projects be considered. The CEQA Applicability Form (400-CEQA) indicates that the proposed project does not have any impacts which trigger the preparation of a CEQA document. A significant project^c is one associated with the emissions levels listed below, during the operation phase of the project:</p> <p style="text-align: center;"> CO 550 lbs/day VOC 55 lbs/day NOx 55 lbs/day SOx 150 lbs/day PM10 150 lbs/day </p> <p>The expected impacts from this permit action on the environment are not significant; this application is to change the tank's commodity; therefore a CEQA analysis is not required.</p>

PART 2 SCAQMD REGULATIONS

Rule 212	Standards for Approving Permits	November 14, 1997
	<p>This modification meets all criteria in Rule 212 for permit approval. The change of the tank's commodity does not affect the operation without emitting air contaminants in violation of Division 26 of the State Health and Safety Code or in violation of AQMD's rules and regulations.</p> <p>This modification does not constitute a significant project because (1) the modified permit unit is not located within 1000 feet of a school; (2) the emissions increase does not exceed the daily maximum specified in subdivision (g) of this rule (30 lbs/day); and (3) the modified permit unit does not have an increased cancer risk greater than, or equal to, one in a million (1x 10⁻⁶) during a lifetime of 70 years or pose a risk of nuisance.</p>	
Rule 401	Visible Emissions	November 9, 2001
(b)(1)	<p>No visible emissions have been reported and are not expected under normal operating conditions. Continued compliance is expected with proper operation and maintenance.</p>	

^c Source: SCAQMD CEQA Handbook (SCAQMD, 1993)

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Rule 402	Nuisance	May 7, 1976
	No nuisance complaints have been reported and are not expected provided that the operation is conducted according to design. Continued compliance with Rule 402 is expected.	

Rule 404	Particulate Matter-Concentration	February 7, 1986
	This rule requires particulate matter discharged into the atmosphere be less than the standard listed in Table 404(a) of this rule. The tank is not expected to have PM emissions. Therefore, compliance is expected.	

Rule 463	Organic Liquid Storage	May 6, 2005
	This rule applies to any above-ground tank with capacity 19,815 gallons or greater for storing organic liquids. This tank is greater than 19,815 gallons and stores an organic liquid. Therefore, this rule does apply.	
463(c)(1)	This external floating roof tank is subject to Rule 463(c)(1). This tank is equipped with the required type of cover and appropriate seals.	
463(e)	The facility had maintained proper recordkeeping and inspections (same reporting as R1178).	
	Based on the above analysis compliance has been met with Rule 463 and is expected to continue to meet compliance with proper recordkeeping and inspections.	

Rule 1149	Storage Tank Cleaning and Degassing	May 2, 2008
	The tank is subject to the requirements of Rule 1149 per Condition S13.8. Table 1 of Rule 1149 specifies that tanks with a capacity greater than 100,000, such as this tank, and the Reid vapor pressure is greater than or equal to 0.5 psia follow the emissions control requirements.	
	The tank will continue to be subject to the tank cleaning and degassing requirements of this rule.	
	The tank has not been taken out of service in the past two years. Therefore, there are no records associated with the emptying and degassing of these tanks. Continued compliance is expected.	

Rule 1173	Fugitive Emissions of Volatile Organic Compounds	February 6, 2009
	This rule applies to fugitive VOC components at refineries, chemical plants, oil, and gas production fields, natural gas process plants and pipeline transfer stations. This rule specifies leak control, identification, operator inspection, maintenance, and recordkeeping requirements for valves pumps, compressors, pressure relief valves, and other components from which fugitive VOC emissions may emanate.	
	Since this does not involve a change to any component outside of the storage tank, no change in fugitive VOC emissions is expected. Also, based on the compliance database this storage tank does not have any issues complying with this rule and should continue	

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	to be in compliance. Phillips 66 is expected to continue to comply with Rule 1173.
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Rule 1178	Further Reduction of VOC Emissions from Storage Tanks at Petroleum Facilities	April 7, 2006
	This rule applies to above ground storage tanks greater than 19,815 gallons that store organic liquids with TVP > 0.1psi. The subject storage tank is greater than 19,815 gallons and stores TVP 3.0 psi. Therefore, this rule applies.	
1178(d)(1)(A) & 1178(d)(1)(B)	The external floating roof tank stores materials with vapor pressure less than 3 psia and is subject to covering each hatch, opening, gasket, etc. And the gaps must not be greater than the rule specifies. Added Condition B22.6 to comply with R1178's 3.0 VP requirement.	
1178(f)	Based on Phillips 66 submitted SCAQMD Form 400-E-18 and EPA Tanks Printouts the external floating roof tank has been or will be equipped with all roof openings in accordance with the specifications listed in (d)(1)(A). The submitted R1178 report also shows the tank is in compliance.	
	Therefore, the tank is expected to continue to comply with the rule.	

Regulation XIII	New Source Review (NSR)	December 6, 2002
	Rule 1303 does not apply because this permit action does not result in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia.	

Rule 1401	New Source Review of Toxic Air Contaminants	March 7, 2008
	As noted above, there is no emission increase of any nonattainment air contaminant from this permit action. A health risk assessment is not required because there is no change to the permit conditions that directly limit emissions. Therefore, it is exempt per 1401(g)(1)(B)	

Regulation XVII	PREVENTION OF SIGNIFICANT DETERIORATION (PSD)	
	As of July 25, 2007, the USEPA signed a new Limited PSD Delegation agreement with SCAQMD. SCAQMD now has the PSD responsibility for all new PSD sources and all modifications to existing PSD sources where the applicant is requesting to use SCAQMD's existing Regulation XVII to determine PSD applicability for a modification (and not the recent calculation methodology adopted by EPA as part of the NSR Reform). Since there will be no increase in emissions of any attained criteria pollutants, a PSD	

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	applicability is not required.
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Regulation XX	RECLAIM	May 6, 2005
	Phillips 66 is a RECLAIM facility. Therefore, it is subject to Reg XX. Since this permit action will not result in an emission increase in RECLAIM pollutants, there are no RECLAIM requirements applicable to this modification.	

Regulation XXX	Title V
	<p>Phillips 66 has been designated as a Title V facility. On July 1, 2009, the initial permit became effective.</p> <p style="padding-left: 40px;">This application will be considered a “Minor Permit Revision”. Meaning that the permit revision does not: require RACT, violate a regulatory requirement, require any significant change in monitoring terms or conditions in the permit, require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit, result in an emission increase of RECLAIM pollutants, result in an increase of emissions subject to NSR or HAP, change a permit condition to avoid an applicable requirement, install a new permit unit subject to NSPS, or modify or reconstruct an existing permit unit resulting in new or additional NSPS and/or NESHAP requirements</p> <p>Since this proposed permit is applicable for a minor permit revision, R3003(j)(1)(S) requires an EPA 45 day review.</p> <p>Therefore, the requirements of this regulation have been met and Phillips 66 is expected to continue to comply.</p>

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PART 3 FEDERAL REGULATIONS

40 CFR 60 Subpart Kb	Standards of Performance for Storage Vessels for Petroleum Liquids
	<p>For which construction, Reconstruction or Modification commenced after July 23, 1984.</p> <p>The tank was previously modified so NSPS applies.</p> <p>According to 40 CFR 60 §60.112b(a)(2), any external floating roof tank with a capacity greater than 40,000 gallons that stores a petroleum liquid with a vapor pressure from 0.75 psia to 11.1 psia is subject to this NSPS:</p> <p style="padding-left: 40px;">(a)(2): The tank has a double deck type cover.</p> <p style="padding-left: 40px;">(i)(A): A mechanical seal is installed as the primary seal and covers the annular space between the floating roof and tank shell.</p> <p style="padding-left: 40px;">(i)(B): The rim mounted secondary seal is installed and covers the annular space between the floating roof and tank shell.</p> <p style="padding-left: 40px;">(ii): Each opening in the roof is equipped with either a gasketed cover or lid that is closed at all times except when the device is under maintenance.</p> <p style="padding-left: 40px;">(iii): The roof floats on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.</p>
	<p>The tank currently complies with R463 (which has the same requirements as this subpart), therefore, the tank complies with this subpart and continued compliance is expected.</p>

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40CFR Part 63 Subpart CC §63.640 Applicability and designation of affected source.	NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS FOR SOURCE CATEGORIES <p>Applicability: Phillips 66 Wilmington Refinery meets both criteria of subparagraph (a)(1) and (a)(2) of this regulation. Basically, this refinery emits 25 tons or more of hazardous air pollutants (HAP) and is considered a major source as defined in section 112(a) of the Clean Air Act. Secondly, this refinery does emit some of HAP listed in table 1 of this regulation.</p> <p>For group categorization at an existing source, the storage tank must meet the definition of Group 1 or Group 2 presented in §63.641. Group 1 definition means if the storage vessel design is greater than or equal to 177 cubic meters, exceeds the allowable vapor pressure for the storage content, and also exceed the toxic composition limit of 4% or greater. Group 2 means the storage tank does not meet the definition of Group 1.</p> <p>Criteria no. 1</p> <table border="1" style="width: 100%; text-align: center;"> <thead> <tr> <th style="width: 15%;">Tank no.</th> <th style="width: 15%;">Tank volume bbl</th> <th style="width: 30%;">Refinery NESHAP GROUP 1 VESSEL DEFINITION BBL</th> <th style="width: 35%;">CONCLUSION</th> </tr> </thead> <tbody> <tr> <td>TANK 3</td> <td>41,000</td> <td>1,113.29</td> <td>Exceeded the limit</td> </tr> </tbody> </table> <p style="text-align: center;">The tank exceeded NESHAP's tank volume criteria limit. Therefore, the storage tank satisfies Criteria No. 1.</p> <p>Criteria no. 2</p> <table border="1" style="width: 100%; text-align: center;"> <thead> <tr> <th style="width: 15%;">Tank no.</th> <th style="width: 15%;">Vapor pressure of storage content (psia)</th> <th style="width: 30%;">Refinery NESHAP GROUP 1 PRESSURE THRESHOLD LIMIT(psia)</th> <th style="width: 35%;">CONCLUSION</th> </tr> </thead> <tbody> <tr> <td>TANK 3</td> <td>3</td> <td>1.51</td> <td>Exceeded the limit</td> </tr> </tbody> </table> <p>Criteria no. 3</p> <p style="text-align: center;">Total hazardous Air Pollutant (HAP) Concentration and Percentages: Recovered oil's Toxic Composition >>>4.0% (Exceeded the limit)</p> <p style="text-align: center;">Based on the above analysis, the district has determined that storage tank No. 3 is under Group 1 Storage Vessel definition.</p> <p>Because of §63.640(q), it allows the permitting authority (SCAQMD) to allow consolidation of the monitoring, recordkeeping, reporting requirements of this subpart overlap with SCAQMD regulations' monitoring, recordkeeping, reporting requirements. Since the tank complies with SCAQMD regulations and NSPS Subpart Kb [63.640(n)], the tank is in compliance. Permit conditions requires continued compliance with this regulation.</p>	Tank no.	Tank volume bbl	Refinery NESHAP GROUP 1 VESSEL DEFINITION BBL	CONCLUSION	TANK 3	41,000	1,113.29	Exceeded the limit	Tank no.	Vapor pressure of storage content (psia)	Refinery NESHAP GROUP 1 PRESSURE THRESHOLD LIMIT(psia)	CONCLUSION	TANK 3	3	1.51	Exceeded the limit
Tank no.	Tank volume bbl	Refinery NESHAP GROUP 1 VESSEL DEFINITION BBL	CONCLUSION														
TANK 3	41,000	1,113.29	Exceeded the limit														
Tank no.	Vapor pressure of storage content (psia)	Refinery NESHAP GROUP 1 PRESSURE THRESHOLD LIMIT(psia)	CONCLUSION														
TANK 3	3	1.51	Exceeded the limit														

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CONCLUSION:

Based on the above evaluation Phillips 66 is in compliance with all required rules and regulations and is expected to continue to comply. Therefore, the following is recommended:

A/N	Recommendation
542089	Issue Permit to Operate with conditions listed in the Conditions Section
542090	Issue Facility Permit Amendment

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List of Attachments:

Attachment A EPA Tank 4.0.9d program Report