

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE APPLICATION PROCESSING AND CALCULATIONS	TOTAL PAGES:	PAGE NO.:
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PERMIT TO CONSTRUCT/OPERATE

APPLICANT	Equilon Enterprises, LLC, Co. Id. 800372
MAILING ADDRESS	20945 S. Wilmington Ave. Carson, CA 90810
EQUIPMENT LOCATION	Same as above

EQUIPMENT DESCRIPTION AND CONDITIONS

See sample section H included in this file.

BACKGROUND & PROCESS DESCRIPTION

This facility is Title V and RECLAIM facility which is primarily a tank storage farm and bulk loading terminal consisting of various size tanks used to store various chemicals and refinery products. This facility also has two loading racks with associated afterburners. This facility previously was also used for refining petroleum products however the refining operations were shut down and removed in December 1991.

The above applications are for 14 internal floating roof tanks. The applications are required to modify the tanks automatic tank level gauge (ATLG) systems by the removal an ATLG float system and the installation of a radar gauge ATLG system. The modification for the Title V and RECLAIM facility permit is under application no. 542997.

The previous and current tanks that will be modified are as follows.

Equipment	tank no.	device Id	Current app no	Previous permit no.	Previous app no.
Title V permit			542997		
fixed roof with internal floater	505	D174	542998	G11197	501511
fixed roof with internal floater	560	D179	543001	F19161	349400
fixed roof with internal floater	561	D180	543002	F19172	349403
fixed roof with internal floater	564	D181	543005	F19171	349405
fixed roof with internal floater	565	D182	543006	F19172	349403
fixed roof with internal floater	566	D189	543007	F19176	349411
fixed roof with internal floater	568	D148	543009	F19242	349442
fixed roof with internal floater	569	D188	543010	F19177	349412
fixed roof with internal floater	572	D150	543013	G21188	418357

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fixed roof with internal floater	573	D151	543014	G21211	418358
fixed roof with internal floater	583	D185	543015	G18688	494231
fixed roof with internal floater	727	D191	543018	G21212	418360
fixed roof with internal floater	729	D192	543019	F19188	349430
fixed roof with internal floater	730	D193	543020	F19187	349429

The pre-modification ATLG systems (currently installed) consist of "float-and-cable" device that measure liquid level changed to determine product throughput. The applicant is proposing to replace these float-and-cable ATLG systems with radar ATLG systems on the above 14 storage tanks

The project will consist of:

- Using the existing roof fitting (slotted guide-pole w/float).
- Removing the "float-and-cable" measurement system.
- Installing the radar gauge measurement system.
- Replacing the current fitting "control" device (float) with a Storage Tank Emissions Reduction Partnership Program (STERPP) approved equivalent option (flexible enclosure) which is a slotted guide pole & flexible cover ("vapor sock" or "sleeve") configuration information.

The type of measuring system has been added to the equipment descriptions for these tanks for clarification and is described below:

COLUMN WELL, PIPE COLUMN WITH FLEXIBLE FABRIC SLEEVE SEAL AND A RADAR GAUGE ATLG SYSTEM

These tanks currently have a slotted guide pole gasketed system with a float sleeve and wiper. When changing this system to a radar system, this guide pole will be converted to a pipe column well, using a flexible fabric sleeve to minimize emissions. See below for how the system will change.

The Radar Level Gauging System

The radar level gauging system works by using non-contact radar measurement system with no moving parts and only the antenna inside the tank atmosphere.

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The type of radar system is a Frequency Modulated Continuous Wave (FMCW) system. The radar gauge transmits microwaves towards the surface of the liquid. The microwave signal has a continuously varying frequency around 10 GHz. When the signal has travelled down to the liquid surface and back to the antenna, it is mixed with the signal that is being transmitted at that moment. The frequency of the transmitted signal has changed slightly during the time it takes for the echo signal to travel down the surface and back again. When mixing the transmitted and the received signal the result is a signal with a low frequency proportional to the distance of the surface. This signal provides a measurement with high accuracy. The method is called the FMCW-method. This system will be installed in a hinged format so the still pipe can still be used for sampling.

Below is information provided by the manufacturer.

EMERSON/ROSEMOUNT Tank Radar Gauge for Internal Floating Roof (IFR) Tank
Item No / Description

EMERSON/ROSEMOUNT Model #: 5900SP0FFI502A1

5900S Radar Level Gauge P1: 5900S Radar Level Gauge; P2: +/-0.5mm (0.02 in.) instrument accuracy; P3: 0=None; P4: F=None, Ready for upgrade to 2-in-1, P5= Bus Powered 2-wire FOUNDATION FieldBus (IEC 61158); P6: 15= FM-US Intrinsic Safety, P7: 0=None; P8: 2=10GHz FMCW Radar Technology US Market; P9: A=Standard Enclosure; P10: 1= 1/2 - 14 NPT Cable; P17: Input Options Needed.


EMERSON/ROSEMOUNT Internal Stilling Well for IFR Tank

EMERSON/ROSEMOUNT Model #: 1A5SHH5A0

5900 Radar Gauge Antenna 5900 Still Pipe Array Antenna, Size: 5", Material: SST 316L and PPS, Mounting: Integrated Hatch Installation, Tank connection: 5" 150 Flange 316L.

EMERSON/ROSEMOUNT Model #: STILL PIPE 5 INCH - 18M

5"Internal stilling well, Length 6x3m 18m (59.1ft) Internal still pipe to fit into an existing 8" stilling well. The pipe consists of 6 Stainless Steel sections with each section 9.8ft long (3m). Total length 18M (59.1 ft.) The top flange has a 31mm hole for a connection of a temperature averaging probe to be mounted outside the 5" still pipe. 3950 adaptor kit for insertion pipe included.

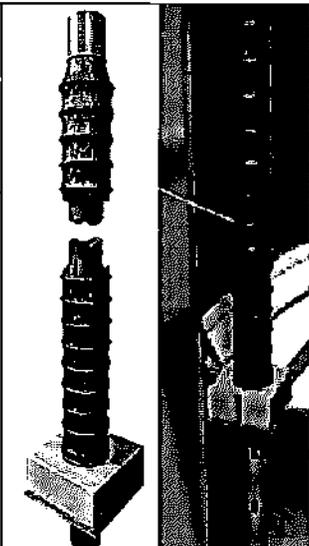

MESA Vapor Guard – Slotted Gauge Pole Cover

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MESA Model #: Vapor Guard Mesa "Vapor Guard" Gauge Pole Cover, fabricated from Mesa 7010.20 material, for 8" gauge pole on a 41'-4" high tank.	
MESA Model #: Transition Box Mesa Custom Transition Box	

Based on the information submitted by the applicant. This radar gauge system will meet or exceed all of the current requirements for ATLG systems for fixed roof internal floating roof tanks and domed external floating roof tanks.

No other modifications will be performed to these tanks other than replacing the current ATLG systems with radar ATLG systems. However, there will be several changes in the equipment descriptions to better describe the tanks, and several conditions added/changed to better clarify requirements for these tanks. None of these changes will relax any of the requirements for these tanks.

Several of the tanks equipment descriptions were changed because the description for the shell was incorrect. The shell types for all tanks when built were riveted type. When the tank shell descriptions were entered into the Facility Permit Program. They were entered incorrectly and were described as having welded shells. This was incorrect and all the shell types will be corrected and changed from "welded" to "riveted". None of the shells were ever a welded type. The correct shell type is now shown in the equipment descriptions.

Since the last time the permits were issued for these tanks either new constructions or modifications, several changes on how engineering writes conditions for tanks and several of the conditions have been modified/added to reflect our current standard conditions for tanks.

Condition no. B59.4 was added to clarify which products/materials may be stored in the tanks this condition was added to all the tanks which are capable of storing products with a true vapor pressure of less than 11 psia.

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B59.4 (new)

The operator shall only use the following material(s) for storage in this equipment:

Gasoline and gasoline blend stocks (e.g. alkylate, iso-octane)

Jet Fuel

Diesel Fuel

Ethanol/Denatured Ethanol

Bio-equivalents (e.g., bio-diesel and bio-jet)

Synfuel equivalents (e.g., oil shale, coal, tar sand derived gasoline, diesel, or jet)

[RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition: D174, D179, D180, D181, D182, D189, D148, D188, D150, D151, D191, D192, D193]

Condition no. C137 (see below) limited the the tanks in device nos. D174, D179, D180, D181, D182, D189, D148, D188, D192, D193 previously included condition. C1.37 will be updated to condition C1.51 for the following reasons: Condition C1.37 has an annual throughput limit of 9,125,000 barrels a year, however it does not have any requirements to verify the throughput. Condition C1.51, clarifies how to validate the throughput by using an Automatic Tank Leveling Gauge (ATLG) system and states are the requirements for the ATLG system.

C1.37 (old)

The operator shall limit the throughput to no more than 9.125e+06 barrel(s) in any one year.

The replacement condition is as follows:

C1.51 (new)

The operator shall limit the throughput to no more than 9,125,000 barrel(s) in any one year.

The operator shall calculate the, in barrels, by the following equation: $0.14 \times D \times D \times L$; where D is the diameter of the tank in feet and L is the total one-way liquid surface level in feet per month.

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The operator shall install and maintain an automatic tank level gauge (ATLG) and recorder to continuously record the liquid surface level. For the purpose of this condition, continuous recording is defined as once every 15-minutes.

The operator shall calculate the total one-way roof movement, in feet, on a 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, throughput shall be determined by 15-minute tank level data averaged for 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 15-minute tank level data averaged from the previous 30 days prior to time that the ATLG went out of service.

[RULE 1303(b)(2) –Offset, 12-6-2002]

[Devices subject to this condition: D174, D179, D180, D181, D182, D189, D148, D188, D150, D151, D191, D192, D193]]

Tank Device Nos. D150, D151, and D191

For the above tanks, the throughput conditions have been updated from C1.19 to C1.2X to be consistent with current ATLG requirements. See below.

C1.19 (old)

The operator shall limit the throughput to no more than 760,500 barrel(s) in any one calendar month

Automatic tank level gauge (ATLG) shall be used to continuously measure the liquid surface level movement. Tank liquid surface level data shall be recorded every 15-minutes and

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these 15-minute levels will be used to calculate level changes. The 15-minute level readings shall be used to calculate the total one-way roof movement, in feet, on a monthly basis.

The operator shall calculate monthly throughput by the following equation: $0.14 \times D \times D \times L$, where D is the diameter of the tank in feet and L is the total one-way roof travel in feet per month as determined by the 15-minute level readings.

The ATLG 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 ¼ inch, the ATLG shall be repaired. While the ATLG is being repaired, throughput shall be determined by 15-minute tank level data averaged for the previous 30 days, prior to the discovery of the discrepancy.

The operator shall keep monthly records on the throughput and the Reid Vapor Pressure for each commodity stored in the equipment.

In the case of a failure or shutdown of the measuring device and/or recorder, excluding routine maintenance, the requirements of this condition shall not apply for a period not to exceed 24 consecutive hours from the time of its occurrence. During the period of failure or shutdown, throughput shall be determined by 15-minute tank level data averaged for the previous 30 calendar days.

In the case of routine maintenance, the requirements of this condition shall not apply for a period not to exceed 4 hours in any calendar day. During the period of routine maintenance, throughput shall be determined by 15-minute tank level data averaged for the previous 30 calendar days.

[RULE 1303(b)(2) –Offset, 5-10-1996]

C1.x2 (new)

The operator shall limit the throughput to no more than 760,500 barrel(s) in any one calendar month

Automatic tank level gauge (ATLG) shall be used to continuously measure the liquid surface level movement. Tank liquid surface level data shall be recorded every 15-minutes and these 15-minute levels will be used to calculate level changes. The 15-minute level readings shall be used to calculate the total one-way roof movement, in feet, on a monthly basis.

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The operator shall calculate monthly throughput by the following equation: $0.14 \times D \times D \times L$, where D is the diameter of the tank in feet and L is the total one-way roof travel in feet per month as determined by the 15-minute level readings.

The ATLG 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 1/4 inch, the ATLG shall be repaired. While the ATLG is being repaired, throughput shall be determined by 15-minute tank level data averaged for the previous 30 days, prior to the discovery of the discrepancy.

The operator shall keep monthly records on the throughput and the Reid Vapor Pressure for each commodity stored in the equipment.

In the case of a failure or shutdown of the measuring device and/or recorder, excluding routine maintenance, the requirements of this condition shall not apply for a period not to exceed 24 consecutive hours from the time of its occurrence. During the period of failure or shutdown, throughput shall be determined by 15-minute tank level data averaged for the previous 30 calendar days.

In the case of routine maintenance, the requirements of this condition shall not apply for a period not to exceed 4 hours in any calendar day. During the period of routine maintenance, throughput shall be determined by 15-minute tank level data averaged for the previous 30 calendar days.

[RULE 1303(b)(2) –Offset, 5-10-1996]

[Devices subject to this condition :]

The replacement condition is as follows:

Tank Device No. 185

For the above tanks, the throughput conditions have been updated from C1.46 to C1.1X to be consistent with current ATLG requirements. See below.

C1.46 (old)

The operator shall limit the throughput to no more than 608,334 barrel(s) in any one calendar month

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Automatic tank level gauge (ATLG) shall be used to continuously measure the liquid surface level movement. Tank liquid surface level data shall be recorded every 15-minutes and these 15-minute levels will be used to calculate level changes. The 15-minute level readings shall be used to calculate the total one-way roof movement, in feet, on a monthly basis.

The operator shall calculate monthly throughput by the following equation: $0.14 \times D \times D \times L$, where D is the diameter of the tank in feet and L is the total one-way roof travel in feet per month as determined by the 15-minute level readings.

The ATLG 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 $\frac{1}{4}$ inch, the ATLG shall be repaired. While the ATLG is being repaired, throughput shall be determined by 15-minute tank level data averaged for the previous 30 days, prior to the discovery of the discrepancy.

The operator shall keep monthly records on the throughput and the Reid Vapor Pressure for each commodity stored in the equipment.

In the case of a failure or shutdown of the measuring device and/or recorder, excluding routine maintenance, the requirements of this condition shall not apply for a period not to exceed 24 consecutive hours from the time of its occurrence. During the period of failure or shutdown, throughput shall be determined by 15-minute tank level data averaged for the previous 30 calendar days.

In the case of routine maintenance, the requirements of this condition shall not apply for a period not to exceed 4 hours in any calendar day. During the period of routine maintenance, throughput shall be determined by 15-minute tank level data averaged for the previous 30 calendar days.

[RULE 1303(b)(2) –Offset, 5-10-1996]

[Devices subject to this condition :]

C1.X1 (new)

The operator shall limit the throughput to no more than 608,334 barrel(s) in any one month.

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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 and L is the total one-way liquid surface level in feet per month.

The operator shall install and maintain an automatic tank level gauge (ATLG) and recorder to continuously record the liquid surface level. For the purpose of this condition, continuous recording is defined as once every 15-minutes.

The operator shall calculate the total one-way liquid surface level, in feet, on a 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, throughput shall be determined by 15-minute tank level data averaged for 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 15-minute tank level data averaged from the previous 30 days prior to time that the ATLG went out of service.

[RULE 1303(b)(2) –Offset, 5-10-1996]

[Devices subject to this condition : D185]

Record keeping condition changes

Condition K67.5 has been deleted and condition K67.8 was added because in addition to the recorded keeping previously required in condition K67.5, condition K67.8 also requires the facility to keep track of the commodities/products stored, hydrocarbon concentration in the vapor space, and comply with the applicable requirements of Rule 1149, 40CFR60, Subpart Kb, and 40CFR63, Subpart R.

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Condition removed:

K67.5 (old)

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

Throughput in barrels per month

Vapor pressure of stored liquid in psia

Other records that may be required to comply with the applicable requirements of District Rules 463 and 1178

[Rule 1178, 4-7-2006, Rule 463, 5-6-05]
 [Devices subject to this condition : D200]

Condition added

K67.8 (new)

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

Tank throughput in barrels per month

Commodity/product stored and time period of its storage

True vapor pressure, in psia, of each commodity/product stored

Hydrocarbon concentration measurements done in the vapor space above the floating roof of the tank

Other records that may be required to comply with the applicable requirements of District Rules 463, Rule 1149, Rule 1178, 40CFR60, Subpart Kb, and 40CFR63, Subpart R

[Rule 463, 5-6-05, Rule 1149, 5-2-2008, Rule 1178, 4-7-2006, 40CFR60, Subpart Kb, 10-15-200340CFR63 Subpart R, 04-06-2006]

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EMISSION CALCULATIONS

For all the applications, the pre modification emission in New Source Review are either entered as zero or different than what was calculated. This was because when the last change of ownership occurred for this equipment, zero were entered in NSR. If it the previous application did have emissions entered, they used a different version of the tanks program therefore the emissions are different. In order to make all the emissions consistent, the pre-modification and the post-modification emissions were calculated for all the tanks. The pre-modification emissions have been entered into NSR for the previous applications. The post modification emissions will be entered into the 14 subject applications. Based on the calculations for pre-modification and post-modification emissions, there will be zero change or an overall net decrease in emissions for all the tanks being modified. Therefore no offsets will be required. Below is a summary of the pre-modification emissions, post-modification emissions, and the difference.

Given:

(All tanks except D185)

9,125,000 barrels/year => 760,500 barrel(s)/mo.

Equal to or less than 11 psia TVP

Gasoline RVP 15 was used in the EPA 4.09 tanks program for all tanks (except D185)

24 hrs/day

7 days/week

Tank D185

608,334 barrels/mo.

Equal to or less than 0.1 psia TVP

Jet fuel was used in the EPA 4.09 tanks program for D185

24 hrs/day

7 days/week

EPA Tanks 4.09d was used to perform the calculations for each tank for both pre-modification and post-modification emissions. The emissions calculations are based on the worse case month (month with highest vapor pressure) for each tank. The actual EPA 4.09d spreadsheets are included in the application folders. All of the throughputs for each tank are the same for both post-modification and pre-modification emissions, the only change in emissions is changing the slotted guidepole to a column well for each tank. Below is a summary of the emission pre-modification, post-modification, and difference in emissions due to the modification:

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EMISSIONS SUMMARY

app no.	Device Id	pre mod	post mod	diff	pre mod	post mod	diff	pre mod	post mod	diff
		lbs/mo	lbs/mo	lbs/mo	lbs/day	lbs/day	lbs/day	lbs/hr	lbs/hr	lbs/hr
542998	D174	1,082.85	1,067.51	-15.34	36.10	35.58	-0.51	1.50	1.48	-0.02
543001	D179	1,082.85	1,067.51	-15.34	36.10	35.58	-0.51	1.50	1.48	-0.02
543002	D180	1,082.83	1,067.50	-15.33	36.09	35.58	-0.51	1.50	1.48	-0.02
543005	D181	1,082.76	1,067.43	-15.33	36.09	35.58	-0.51	1.50	1.48	-0.02
543006	D182	1,082.81	1,067.47	-15.34	36.09	35.58	-0.51	1.50	1.48	-0.02
543007	D189	1,082.86	1,067.52	-15.34	36.10	35.58	-0.51	1.50	1.48	-0.02
543009	D148	1,082.81	1,067.47	-15.34	36.09	35.58	-0.51	1.50	1.48	-0.02
543010	D188	1,082.81	1,067.47	-15.34	36.09	35.58	-0.51	1.50	1.48	-0.02
543013	D150	1,103.21	1,087.87	-15.34	36.77	36.26	-0.51	1.53	1.51	-0.02
543014	D151	1,242.58	1,230.03	-12.55	41.42	41.00	-0.42	1.73	1.71	-0.02
543015	D185	589.20	589.20	0.00	19.64	19.64	0.00	0.82	0.82	0.00
543018	D727	1,264.60	1,249.27	-15.33	42.15	41.64	-0.51	1.76	1.74	-0.02
543019	D729	1,293.32	1,307.27	13.95	43.11	43.58	0.46	1.80	1.82	0.02
543020	D730	1,293.21	1,307.15	13.94	43.11	43.57	0.46	1.80	1.82	0.02

This project has an overall net decrease in the emissions. Therefore offsets will not be required for and of the above tanks.

Rule 1401

Since all the modifications result in an overall contemporaneous risk reduction due to a net decrease in toxic emissions no 1401 risk assessments are required because there is no increase in toxic emissions due to these modifications.

EVALUATION**Rule 212****Standards for Approving Permits and Issuing Public Notice**

The proposed modifications meet all criteria Rule 212 for approval. The modified equipment is designed so it can be expected to operate without emitting air contaminants

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in violation of sections 417, 41701 and 44300 of the State Health and Safety Code or in Violation of AQMD's Rules and Regulations. This project as an overall net decrease in emissions, therefore they will not exceed the daily maximum specified in subdivision (g) or Rule 212. None of the modified permit units will have an increased cancer risk. There is no school within 1000 ft. of this project.

Rule 401 Visible Emissions

Visible emissions are not expected under normal operating conditions of the tanks.

Rule 402 Nuisance

No nuisance complaints are expected provided that the operation is conducted according to design. Compliance with 402 is expected.

Rule 463 Organic Liquid Storage

All of the domed external floating roof tanks consist a floating roof consisting of a pontoon-type or double deck-type cover that continuously rests on the surface of the organic liquid and is equipped with a primary and a secondary seal. All of the seals used meet the applicable criteria of Rule 463 (c)(1)(A) through (c)(1)(C).

All of the fixed roof tanks are equipped with an internal floating-type cover have a closure device which consists of a liquid mounted primary seal and a secondary seal. This primary system meets the requirements of subparagraph Rule 463 (c)(1)(A).

Based on the information submitted by the applicant, compliance with Rule 463 is expected with proper record keeping and inspections.

Regulation IX – NEW SOURCE PERFORMANCE STANDARDS

40 CFR 60 Subpart K Standards of Performance for Storage Vessels for Petroleum Liquids.

Subparts K, Ka, and Kb impose requirements for petroleum liquids storage vessels built after June 11, 1973. These storage tanks were constructed prior to this date and there will be no increase in emissions due to this modification, therefore these regulations do not apply.

40 CFR 63 Subpart R National Emission Standards for Gasoline Distribution Facilities

The external floating roof tanks must meet the following specifications:

Each external floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal.

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(A) The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. The seal shall completely cover the annular space between the edge of the floating roof and tank wall.

(B) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion.

These tanks will meet the requirements of this rule

Rule 1149 **Storage Tank Cleaning and Degassing**
Compliance is expected.

Rule 1173 **Fugitive Emissions of Volatile Organic Compounds**
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 project does not involve a change to any component outside of the storage tanks, no change in fugitive VOC emissions is expected.

Rule 1178 **Further reductions of VOC from Storage Tanks at Petroleum Refineries**
This Rule applies to facilities with VOC emissions that exceed 20 tons per year. After reviewing the 2006 AER emissions, the emissions exceeded 20 tons per year therefore this tank is required to comply with this rule. These tanks will meet these and all of the other requirements of this Rule.

Rule 1303: Requirements

Rule 1303(a) – Best Available Control Technology
Each tank has either an emission decrease, no increase, or an increase of less than 1 lb/day, therefore, BACT requirements do not apply.

Rule 1303(b)(1) - Modeling
VOC emissions are not required to be modeled.

Rule 1303 (b)(2) – Emissions Offsets
Since this project results in a reduction in VOC emission offsets are not required.

Rule 1303 (b)(4) – Facility Compliance
The subject facility complies with all applicable rules and regulations of the District.

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Rule 1401 New Source Review of Carcinogenic Air Contaminants

Since this project will have an overall contemporaneous risk reduction due to a net decrease in toxic emissions, no 1401 risk assessments is required and this equipment will comply with this rule.

Regulation XVII– Prevention of Significant Deterioration (PSD)

No attainment air containments or green house gas emissions are associated with these modifications, this regulation is not applicable.

Regulation XX – REGIONAL CLEAN AIR INCENTIVES MARKET (RECLAIM)

This facility is a RECLAIM facility. Therefore, it is subject to Reg. XX. There will not be an increase in emissions of RECLAIM pollutants.

Reg XXX: Title V Permits

The Title V permit has been issued for this facility, and the necessary sections will be amended with the necessary revisions under application no. 542997.

CEQA – California Environment Quality Act.

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 project does not have any impacts which trigger the preparation of a CEQA document. The expected impacts of the project on the environmental are not significant. Therefore a CEQA analysis is not required.

RECOMMENDATIONS

Based on the information submitted and the above evaluation, it is recommended that these tanks be issued a conditional Permit to Construct/Operate