



<b>SOUTH COAST AIR QUALITY MANAGEMENT</b>	Pages 4	Page 1
<i>ENGINEERING AND COMPLIANCE DIVISION Waste Management &amp; Bulk Terminal Permitting</i>	A/N 452214, 215, 504582	Date 03/08/13
<b>SFPP, L.P. – WATSON STATION STORAGE TANKS PRODUCTS</b>	Processed by Ed O'Neal	Checked by TGA/COT

EVALUATION FOR MINOR REVISION  
SECTION D – PERMIT TO OPERATE

**COMPANY NAME**

SFPP, LP (Watson Station)

Facility ID# 800278

**MAILING ADDRESS**

1100 Town & Country Road  
Orange, CA 92868

**EQUIPMENT ADDRESS**

20410 S. Wilmington Avenue  
Carson, CA 90810

**DESCRIPTION**

APPLICATION NO. 452214

STORAGE TANK W-14

APPLICATION NO. 452215

STORAGE TANK W-15

APPLICATION 504582

MINOR PERMIT REVISION

**EQUIPMENT DESCRIPTION & PERMIT CONDITIONS**

See draft permit included in this folder.



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## BACKGROUND

This is a Title V facility which is a "Pipeline Breakout Station" handling various petroleum liquids (gasoline, diesel, and jet fuel). At this facility, there are SCAQMD permits for 25 storage tanks, 3 diesel engines and a Vapor Collection and Disposal System (VC&DS). An initial Title V permit was issued February 23, 2009, and there have been multiple revisions.

Application nos. 452214 and 452215 were submitted January 3, 2006 for admin changes to include diesel and jet fuel in fuels in their permits' descriptions. A review of records show when the applications were reviewed in 1999, the applicant had stated that diesel and jet fuel would also be stored in the tanks. However, the reviewer only mentioned gasoline in the permit description. Adding diesel and jet fuel will not increase maximum emissions. Current District policy is to restrict product stored in the tanks in the permit conditions. So, gasoline will be removed from the permits' descriptions and a condition will be added that allows the storage of diesel and jet fuel in addition to gasoline in the tanks.

Also, for fee purposes these applications are being treated as admin changes, since we are clarifying diesel and jet fuel as acceptable tank product, but for Title V purposes this is a minor permit revision requiring a 45 day EPA review.

## NOV/NC HISTORY

A review of compliance records did not show any Notices to Comply or public nuisance complaints for this facility in the past two years.

However, Notice of Violation P57728 was issued September 9, 2012 for a vapor leak on August 29, 2012 exceeding 500 ppm. The equipment was repaired verified repaired on August 31, 2012.

## EMISSIONS

In 1992, a vapor control device (VCD) was constructed at the Watson Station including tanks W-14 and W-15, and the VCD operation was misunderstood resulting in incorrect NSR and AEIS emission totals.

When the floating roof is on its leg, the vapor space under the floating roof is vented to the vapor recovery system. When the floating roof rests on product, there are losses which are vented to the atmosphere as the TANKS program calculated. These emissions are not vented to the vapor recovery system. Conditions 7 and 8 will be modified to clarify this.

With these applications, baseline emissions were calculated using the permits' limits and using the TANKS 4.09d program. (The tanks and emissions are identical) NSR will be updated.

$$\text{VOC}_{(W-14 \& 15)} = 641.17 \text{ lb/month} = 21.4 \text{ lb-ROG/day (maximum month - August)}$$

Any future emission increases must be offset.



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### 1401 Toxic emissions

For this admin change, there will be no change in 1401 toxic emissions.

### **RULES EVALUATION**

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

The permit unit is not located within 1000 feet of a school, emissions increase will not exceed the daily maximum specified in subdivision (G) of Rule 212; and the new permit unit will not have an increased cancer risk greater than, or equal to, one in a million ( $1 \times 10^{-6}$ ) during a lifetime of 70 years or pose a risk of nuisance. Therefore, no public notice is required.

**Rule 401: Visible Emissions**

With proper operation of this equipment, visible emissions are not expected. Therefore, compliance with this rule is expected.

**Rule 402: Nuisance**

With proper operation of this equipment, visible emissions are not expected. Therefore, compliance with this rule is expected.

**Rule 463: Fugitive Emissions of Volatile Organic Compounds**

The tanks are equipped with internal floating roofs and double seals and are connected to VC & DS. Therefore, compliance expected.

**Rule 1149: Storage Tank and Pipeline Cleaning and Degassing**

Compliance with this rule is conditioned on the permits when degassing.

**Rule 1178: Fugitive Emissions of Volatile Organic Compounds**

Compliance with this rule is conditioned in the permit.



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### Regulation XIII - New Source Review

There will be no increase of maximum daily emissions from this change since gasoline produces more emissions than diesel and jet fuel. Also, these fuels were mentioned in the previous applications. Therefore, this rule is not applicable.

### REGULATION XXX – TITLE V PERMITS

This permit is a Minor Permit Revision.

California Environmental Quality Act (CEQA) - 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) submitted 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 environment are not significant: therefore a CEQA analysis is not required.

40CFR60 Subpart Kb: Tanks are in compliance with this requirement.

### RECOMMENDATION

Based on the above evaluation, recommend modifying permit description and permit conditions to clarify that products stored include diesel and jet fuel and how tanks are vented as a minor permit revision per Regulation XXX, and send to EPA for 45 day notice. See draft of Section D in this folder for final equipment descriptions and conditions.