



<b>SOUTH COAST AIR QUALITY MANAGEMENT</b>	Pages 5	Page 1
<b>ENGINEERING AND COMPLIANCE DIVISION</b> <b>Waste Management &amp; Bulk Terminal Permitting</b>	A/N 433801 & 802	Date 6/04/13
<b>ULTRAMAR (VALERO MARINE TERMINAL)</b> <b>P/O EVALUATION</b>	Processed by Ed O'Neal	Checked by

EVALUATION FOR P/O  
-SECTION D-

**COMPANY**

Ultramar Inc.  
(Valero Marine Terminal)

Facility ID# 800198

**MAILING ADDRESS**

2402 E. Anaheim Street  
Wilmington, CA 90744

**EQUIPMENT LOCATION**

961 La Paloma Avenue  
Wilmington, CA 90744

APPLICATION NO. 433801

HOLDING TANK, NO. 99-TK-1, 19,800 GALLONS, 11'-3" DIA. X 26'-9" H.

APPLICATION NO. 433802

HOLDING TANK, NO. 99-TK-2, 19,800 GALLONS, 11'-3" DIA. X 26'-9" H.

**EQUIPMENT DESCRIPTION & PERMIT CONDITIONS**

See draft permit included in this folder.

**BACKGROUND**

This is a Title V facility which is a marine terminal with a dock for unloading ships, 19 storage tanks, a Vapor Destruction Unit (VDU) and a truck unloading station. This terminal is connected to their refinery via pipelines.

An initial Title V permit was issued April 6, 2009. There have been multiple revisions.



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The above described applications were submitted on August 8, 2004 to modify an existing oily water gathering and separating system. However, it has been determined that these holding tanks operate separate and distinctly from the gathering and separation system and thus will be permitted individually and separately.

### **NOV/NC HISTORY**

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

### **PROCESS DESCRIPTION**

Ultramar currently has a permit for an oily water gathering and separating system (A/N 178051; P/O D07203). In actuality the system is a storm water drain system. Since the facility handles petroleum products, some areas have oily residue which in heavy rains produce an oily sheen on the build-up of storm water.

All of the petroleum product storage tanks are equipped with containment walls and when it rains the storm water accumulates. Under most circumstances, the accumulated water soaks into the ground. But if several feet of water accumulates, the older product tanks, which are not secured to their foundations, can actually be lifted up. When this occurs, the accumulated storm water is pumped into holding tanks 99-TK-1 and 99-TK-2.

No separation process takes place in the holding tanks. Rather, contents are pumped to a slop tank and then sent to the refinery via pipeline for further processing.

In the event a major storm occurs (approximately every ten years) and the holding tank capacity is exceeded, the oily sheen on the surface of the accumulated water is removed by a vacuum truck and the remaining skimmed water is released into the harbor. Before release to the harbor, however, Ultramar is required to test the water and get approval from the harbor authority for such a release.

The area surrounding the holding tanks is dirt and rock. Two of the sump areas have an oily nature but no standing pools of oil. Since this is a storm water system, it was generally considered that a permit would not be required, however, since some oil (organic material) is in the storm water that is placed into the holding tanks, it was determined that the holding tanks required permits. The water pumps and associated drains however do not need to be permitted.



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## EMISSION CALCULATIONS

Determining emissions is difficult, since most liquid added to the tanks is storm water. In addition, the tanks are generally idle and are only used every few years in instances of heavy rains. As a worst case approach, it was decided to calculate the tank standing storage and breathing losses as if the contents were composed entirely of Residual Oil No. 6 at a maximum projected throughput of 120 tank turnovers per year, and an average liquid height of 3 feet (as opposed to 13 feet which is the normal default value of 50% of the maximum liquid height of the tank).

Using the TANKS 4.09d program (see tank runs included in this file):

VOC emissions (per tank) = 0.31 lbs/year

Corresponding toxic emissions, assuming gasoline as worst case @ 1% benzene = .0031 pounds per year.

## 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.



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Rule 463: Organic Liquid Storage

Tank capacity is less than 19,815 gallons; rule does not apply.

Rule 466: Pumps and Compressors

This rule is not applicable since Rule 1173 applies to Marine Terminals.

Rule 466.1: Valves and Flanges

This rule is not applicable since Rule 1173 applies to Marine Terminals.

Rule 1173: Company is required by facility wide condition to comply with this rule; continued compliance is expected.

Rule 1178: This rule applies to this facility, but since these tanks' capacities are less than 19,815 gallons; rule does not apply to this equipment.

Reg. XIII: New Source Review

Emissions are much less than 0.42 pounds per day, therefore BACT and offsets are not required. There is no requirement for modeling of VOC.

Facility is currently in compliance with all applicable rules and regulations.

Rule 1401: New Source Review of Toxic Air Contaminants

Worst case toxic emissions, assuming VOC emissions are 1% benzene (based on gasoline), are .0031 pounds per year, which is below Tier 1 screening levels for MICR (2.7 pounds per year), HIA (7.3 pounds per hour), and HIC (0.7 pounds per hour). Compliance with this rule easily expected.

#### REGULATION XXX – TITLE V PERMITS

This permit revision will be handled as a De-Minimus Significant Permit Revision (very slight emission increase).



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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.

### **RECOMMENDATION**

Based on the above evaluation, propose to the EPA that the holding tanks be incorporated into Section D of Ultramar's Title V permit following their 45-day review (De-Minimus Significant Revision).