

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;">STATIONARY SOURCE COMPLIANCE DIVISION</p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 1
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

PERMIT TO OPERATE
- Change of Condition -

COMPANY NAME: Chevron Products Company

MAILING ADDRESS: P.O. Box 97
El Segundo, CA 90245

EQUIPMENT LOCATION: 324 W. El Segundo Blvd.
El Segundo, CA 90245

EQUIPMENT DESCRIPTION:

Description	ID No.	Connected To	RECLAIM Source Type	Emissions and Requirements	Conditions
Process 16: STORAGE TANKS					P13.1
System 3: EXTERNAL FLOATING ROOF TANK					S13.3
STORAGE TANK, EXTERNAL FLOATING ROOF, NO. 1012, WELDED SHELL, WITH THREE MIXERS AND AN EXTERNAL HEATER, 614630 <u>486585</u> BBL; DIAMETER: 260 FT; HEIGHT: 71 FT 7 IN <u>63 FT 9 IN</u> WITH FLOATING ROOF, DOUBLE DECK PRIMARY SEAL, CATEGORY A, METALLIC SHOE SECONDARY SEAL, CATEGORY A, WIPER TYPE GUIDEPOLE, SLOTTED, WITH GASKETED SLIDING COVER, POLE SLEEVE, POLE FLOAT AND FLOAT WIPER A/N: 447419 <u>504577</u>	D1454			HAP: (10) [40CFR 63 Subpart CC, <u>#3A</u> #2 , 6-23-2003]	C1.121, E71.48, E71.49, E440.9, E440.10, H23.12, K67.52, K171.23

A permit to construct in Section H of Chevron's Title V permit is currently acting as a temporary permit to operate. Applicable permit pages from Section H are contained in [the engineering file](#). Proposed additions to the current permit are shown as [underlined](#) and deletions are shown as [strikeouts](#).

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;"><i>STATIONARY SOURCE COMPLIANCE DIVISION</i></p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 2
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

CONDITIONS:

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
Benzene	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, 14, **16**]

System Conditions:

S13.3 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	1149
VOC	District Rule	1178

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

[Systems subject to this condition: Process 16, System 1, 2, **3**, 5]

Device Conditions:

C1.121 The operator shall limit the throughput to no more than 1,667,000 barrel(s) in any one calendar month.

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

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;"><i>STATIONARY SOURCE COMPLIANCE DIVISION</i></p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 3
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

data averaged from the previous 30 days prior to the time that the ATLG went out of service.

[**RULE 1303(b)(2)-Offset, 5-10-1996**]

[Devices subject to this condition: **D1454**]

E71.48 The operator shall only use this equipment for the storage of FCC Feed and Hydrobate with a true vapor pressure of less than 3 psia at actual storage conditions. This vapor pressure limit shall not apply for the storage of crude oil. The purpose of this condition is to ensure that this equipment operates in such a manner that it complies with R1178.

[**RULE 1178, 4-7-2006**]

[Devices subject to this condition: **D1454**]

E71.49 The operator shall only use this equipment for the storage of crude oil with true vapor pressure of less than 9.0 psia at storage conditions.

[**RULE 1303(b)(2)-Offset, 5-10-1996**]

[Devices subject to this condition: **D1454**]

E440.9 The operator shall operate and maintain this equipment according to the following specifications:

The operator shall not use the slotted guidepole without a float and its wiper when the commodity being stored in this equipment has a vapor pressure greater than or equal to 0.5 psia at storage conditions.

The operator shall notify the primary SCAQMD inspector for the refinery anytime that the pole float is inserted into or removed from the slotted guidepole. The notification shall be made within 5 days of each insertion or removal of the pole float and shall include the basis for the insertion or removal of the pole float.

[**RULE 463, 5-6-2005**]

[Devices subject to this condition: D1371, D1373, **D1454**]

E440.10 The operator shall operate and maintain this equipment according to the following specifications:

The sliding cover shall be in place over the slotted-guidepole opening through the floating roof at all times except when the sliding cover must be removed for access.

The deck fitting shall be visually inspected for the slotted guidepole at least once every 10 years and each time the vessel is emptied and degassed. If the slotted guidepole deck fitting or control devices have defects, or if a gap of more than 0.32 centimeters (1/8 inch) exists between any gasket required for control of the slotted guidepole deck fitting and any surface that is intended to seal, such items shall be repaired before filling or refilling the storage vessel with regulated material. Tanks taken out of hydrocarbon service, for any reason, do not have to have any slotted-guidepole controls in place during the time they are out of service.

[**40CFR 60 Subpart Ka, 5-5-1989**]

[Devices subject to this condition: **D1454**]

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;"><i>STATIONARY SOURCE COMPLIANCE DIVISION</i></p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 4
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

H23.12 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR60, SUBPART	Ka

[**40CFR 60 Subpart Ka, 5-5-1989**]

[Devices subject to this condition: **D1454**]

K67.52 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 calendar month.

Commodity/product stored and time period of its storage.

Actual vapor pressure, in psia, of each commodity/product stored.

Date and time of any removal or insertion of the slotted guidepole float.

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

[**RULE 1149, 5-2-2008; RULE 1178, 4-7-2006; RULE 463, 5-6-2005; 40CFR 60 Subpart Ka, 5-5-1989; 40CFR 63 Subpart CC, 6-23-2003**]

[Devices subject to this condition: **D1454**]

~~**K171.23** The operator shall provide to the District the following items:~~

~~Final drawings and/or specifications of the modification done to the storage tank shall be submitted to the District within 30 days after its completion.~~

~~[**RULE 1178, 4-7-2006**]~~

~~[Devices subject to this condition: **D1454**]~~

BACKGROUND:

Chevron Tank 1012 (D1454) is not currently permitted to store Hydrobate. Chevron began storing Hydrobate in the subject tank on or about November 25, 2009. Chevron informed AQMD inspector Paul Caballero at that time that they had begun storing Hydrobate in the tank. Chevron submitted AN 504577 on December 17, 2009. In the subject application, Chevron requests to add Hydrobate to permit condition E71.48 as a commodity that can be stored in this tank. This tank is currently permitted to store the following commodities:

- FCC Feed with a TVP of less than 3 psia (condition E71.48)
- Crude Oil with a TVP of less than 9 psia (condition E71.49)

Permit to construct A/N 447419 was issued on December 13, 2005 for extension of the tank shell for Tank 1012 by 7 ft 10 inches and to make the following changes to the equipment description and permit conditions:

- Addition of the existing slotted guidepole to the equipment description;
- Removal of crude oil and FCC feed from the equipment description;



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

STATIONARY SOURCE COMPLIANCE DIVISION

APPLICATION PROCESSING AND CALCULATIONS

PAGES 19	PAGE 5
APPL. NO. 504577	DATE 6/11/10
PROCESSED BY R. Sanford	CHECKED BY

- Replacement of condition B22.14, which limited the tank to storage of materials with a TVP less than 9 psia, with conditions E71.48 and E71.49, which limited the tank to storage of crude oil with TVP less than 9 psia (E71.49) and FCC feed with a TVP less than 3 psia (E71.48);
- Addition of condition E440.9, which required use of a float in the slotted guidepole when storing materials with a TVP greater than 0.5 psia;
- Replacement of throughput condition C1.74 with condition C1.21, which utilized wording that was consistent with wording in more recent throughput conditions;
- Addition of recordkeeping condition K67.52; and
- Addition of condition K171.23, which specified the requirement to submit tank drawings following completion of the proposed tank shell extension.

Chevron subsequently decided not to extend the tank shell. The decision not to extend the shell did not impact any of the permit condition changes that were made under PC A/N 447419 with the exception of K171.23, which required Chevron to submit tank drawings following completion of the tank shell extension. Therefore, the permit to construct is acting as a temporary permit to operate that included the other permit condition changes. For the permit to operate issued under A/N 504577, the height of the tank will be changed back to 63 FT 9 IN and the capacity will be changed to 486,585 bbl, which is based on a safe working height of 60 ft.

PERMIT HISTORY:

The permitting history for this tank is shown in the following table.

Permit History for Tank 1012 (D1454)

Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
C18858	2/28/80	M21393	3/2/82	Original construction.
176008	11/4/88	D38027	5/2/91	Modified tank seals and increased vapor pressure limit from 4 psia to 11 psia.
283259	na.	D75594	7/29/93	Modified the equipment description to include an external heater and three mixers.
393640	na.	F53553	7/16/02	Added a vapor sleeve to the existing slotted guidepole; increased annual throughput limit from 9,125,000 bbls to 20,000,000 bbls (1,667,000 bbl/month); reduced vapor pressure limit from 11 psia to 9 psia; and corrected safe working height in the equipment description.
447419	12/13/05	na.	na.	Extend the tank shell by 7 ft 10 in up to a total height of 71 ft 7 in. Also reduced the vapor pressure limit for non-crude commodities (FCC Feed) to 3 psia for compliance with Rule 1178. Added condition to permit removal of pole float when storing commodity with vapor pressure less than 0.5 psia.
504577	na.	na.	na.	Add hydrobate as a permitted commodity.

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;"><i>STATIONARY SOURCE COMPLIANCE DIVISION</i></p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 6
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

COMPLIANCE RECORD REVIEW:

Facility ID 800030 does not have any outstanding NC's or NOV's. A summary of the NC's and NOV's issued to the facility during the last two years is shown in Appendix A. Chevron stated that they began storing Hydrobate in this tank on or about November 25, 2009 so they are currently violating permit condition E71.48, which specifies FCC Feed as the only non-crude commodity that can be stored in this tank. Issuance of this permit will bring the tank into compliance with all of the conditions in the Title V Permit.

FEE ANALYSIS

Summary of Fee Analysis

A/N	Equipment Description	BCAT/ CCAT	Fee Schedule	Fee Type	Fiscal Year (1)	Fee
504577	External Floating Roof Storage Tank	251904 (BCAT)	C	Change of Condition	09-10	\$ 1,758.90
507648	RECLAIM/Title V Permit	555009 (BCAT)	na.	RECLAIM/Title V Permit Revision	09-10	\$ 1,687.63
Total						\$ 3,446.53
Fees Paid						\$ 4,325.98
Outstanding Balance						\$ - 879.45

(1) Based on the date that the application was submitted.

A refund of \$879.45 is due for A/N 504577. Chevron submitted 150% of the standard permit fee for storing Hydrobate since it is not a permitted commodity for Tank 1012. District Rule 301 specifies that an applicant must pay 150% of the standard permit fee "when equipment is operated, built, erected, installed, altered, or replaced (except for replacement with identical equipment) without the owner/operator first obtaining a required Permit to Construct or Permit to Operate". Tank 1012 was not operated, built, erected, installed, altered, or replaced without a permit to construct or operate so the additional 50% fee is not required.

A change of condition is defined in Rule 301 as "a change of a current permit condition that will not result in an emission increase". The definition also specifies that a change to an enforceable condition that will result in a emission increase subject to the New Source Review will be considered a change in the method of operation and processed as an Alteration or Modification. Since the storage of Hydrobate in Tank 1012 does not cause an emission increase this application is a change of condition application that is not subject to the additional 50% fee.

PROCESS DESCRIPTION:

A description of Tank No. 1012 (D1454) is contained in the equipment description above. The tank is currently permitted to store crude oil or FCC Feed. Chevron is requesting to add Hydrobate as a permitted commodity. Hydrobate is produced in the Naphtha Hydrotreating (NHT) unit. In the NHT, straight run and/or cracked gasoline are contacted with hydrogen at high pressure over a catalyst to remove nitrogen and sulfur compounds. Hydrobate is typically fed to the CCRU to increase its octane and then blended into finished gasoline. It is essentially a sweetened naphtha. For six Hydrobate samples collected during the period of June 2009 to March 2010, the true vapor pressure varied from a minimum of 0.51 psi to 2.29 psi with an

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;"><i>STATIONARY SOURCE COMPLIANCE DIVISION</i></p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 7
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

average of 1.27 psi. As a conservative assumption, a vapor pressure of 2.99 psi at all temperatures was used to estimate VOC emissions with Hydrobate.

CALCULATION

Volatile Organic Compounds (VOC)

Baseline VOC emissions for the subject storage tank are based on the storage of crude oil with a vapor pressure of 9 psia. EPA Tanks 4.0.9d is used to estimate the maximum potential VOC emissions from the storage of crude oil and Hydrobate in the subject tank. The following table contains a comparison of the estimated VOC emissions for Tank 1012 while storing hydrobate versus crude oil. As seen in the table, estimated maximum VOC emissions are lower for Hydrobate storage than for crude oil storage.

Estimated VOC Emissions

Commodity	Maximum Potential VOC Emissions		
	lb/yr	lb/day (1)	lb/hr
Crude Oil	9073	25.2	1.04
Hydrobate	5547	15.4	0.63

(1) 30 day average = annual VOC emissions / 360

Note that the new source review (NSR) baseline VOC emissions were established as 19.9 lb/day under A/N 176008. The emission estimate for A/N 176008 utilized the EPA Tanks. 2.0 program. This baseline VOC emission estimate was carried through to A/Ns 393640 and 447419 since there was no increase in VOC emissions under these applications. The higher VOC emission estimate for A/Ns 393640, 447419, and 504577 versus A/N 176008 are due to differences in the VOC emission estimation methodology between EPA Tanks 4.0 and EPA Tanks 2.0. For accuracy, the EPA Tanks 4.0 estimate of 25.2 lb/day of VOC will be entered for A/N 504577. The VOC emissions in the NSR database for A/N 447419 will be adjusted to 25.2 lb/day to show that there is no increase in VOC emissions for A/N 504577.

Toxic Air Contaminants (TAC)

The maximum TAC concentrations for Crude Oil and Hydrobate based on sampling Chevron performed for EPA's Toxic Release Inventory (TRI) program follows:

Toxic Air Contaminant (TAC)	Concentration (weight %)	
	Crude Oil	Hydrobate
Benzene	0.11	0.39
Ethyl Benzene	0.15	0.80
Hexane	1.02	0.35
Toluene	0.36	2.61
Xylene	0.55	3.43

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;">STATIONARY SOURCE COMPLIANCE DIVISION</p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 8
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

These TAC concentrations were utilized along with the EPA Tanks 4.0.9d program to estimate maximum TAC emissions for the storage of crude oil and Hydrobate in Tank 1012. The Tanks 4.0.9d printouts are contained in the [engineering file](#).

TAC emissions are estimated for evaluation of the health risk impacts per District Rule 1401. For the Rule 1401 analysis, both the total TAC emissions for Hydrobate storage and the incremental increase in TAC emissions with Hydrobate storage must be calculated. The incremental increase in TAC emissions is determined by subtracting the TAC emissions for Crude Oil storage from the estimated total TAC emissions for Hydrobate. The estimated total TAC emissions and incremental increase in TAC emissions are shown in the table below.

TAC Emissions for Hydrobate and Crude Oil Storage

Toxic Air Contaminant	Estimated TAC Emissions			Incremental TAC Emission Increase	
	Crude Oil	Hydrobate		Hydrobate	
	(lb/yr)	(lb/yr)	(lb/hr)	(lb/yr)	(lb/hr)
Benzene	4.5	18.9	2.2x10 ⁻³	14.4	1.6x10 ⁻³
Ethyl benzene	2.5	8.6	9.8x10 ⁻⁴	6.1	7.0x10 ⁻⁴
Hexane	136	25.9	3.0x10 ⁻³	0	0
Toluene	5.2	49.2	5.6x10 ⁻³	44	5.0x10 ⁻³
Xylene	9.0	32.0	3.7x10 ⁻³	23	2.6x10 ⁻³

RULE EVALUATION

California Environmental Quality Act (CEQA)

According to the District's CEQA Guidelines, the net emission increase thresholds for significant effect are:

VOC: 55 lb/day
 PM10: 150 lb/day
 CO: 274 lb/day

CEQA analysis is not required for the proposed change to the permitted commodities since there is no increase in the emissions of any of these criteria air pollutants and there are no other significant environmental impacts. On the 400-CEQA form, Chevron marked "No" to all of the additional criterion that may trigger CEQA. For these reasons, CEQA does not apply.

Regulation II: Permits

Rule 212: Standards for Approving Permits (November 14, 1997)

The proposed condition changes does not require public notification for the following reasons:

212(c)(1) – Public notice is required for a project if any of the modified permit units are located within 1000 feet of a school. Young Vision Day School, which is the nearest school to the tank, is more than 2000 feet from the tank. Public notice is not required under this clause.

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;"><i>STATIONARY SOURCE COMPLIANCE DIVISION</i></p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 9
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

212(c)(2) – Public notice is required for any “new or modified facility”, which has on-site emission increases exceeding any of the following net emission increase thresholds that are specified in 212(g):

CO: 220 lb/day
NOx: 40 lb/day
Pb: 3 lb/day
ROG: 30 lb/day
PM10: 60 lb/day
SOx: 30 lb/day

Public notice is not required under this clause since there is no increase in the emission of any of the listed pollutants.

212(c)(3): Public notice is required for any new or modified permit units that have an increase in toxic air contaminants that results in an increase of maximum individual cancer risk (MICR) of more than one in a million (1×10^{-6}) during a lifetime (70 years). As discussed in additional detail in the evaluation of Rule 1401, the tank with Hydrobate storage passed a Tier 1 screening for chronic/cancer hazard. This indicates that the increase in MICR is less than one in a million. Public notice is not required under this clause.

212(g): 212(g) specifies that any new or modified sources subject to Regulation XIII which undergo construction or modifications resulting in an emissions increase exceeding any of the daily maximum emission thresholds (listed in the table above) will require notification. From Regulation XIII (Rule 1302), the definition of “Source” is any permitted individual unit, piece of equipment, article, machine, process, contrivance, or combination thereof, which may emit or control an air contaminant. This includes any permit unit at any non-RECLAIM facility and any device at a RECLAIM facility.

Public notice is not required under this clause since there is no increase in the emission of any of the listed pollutants.

Regulation IV: Prohibitions

Rule 401: Visible Emissions (November 9, 2001)

This rule specifies that a person shall not discharge emissions from a source for a period or periods aggregating more than three minutes in any one hour which are as dark or darker in shade as that designated No. 1 on the Ringelmann Chart or emissions of such opacity that it obscures an observers view to an equal or greater level. This is equivalent to opacity of 20%.

Operation of the subject tank is not expected to cause any visible emissions. Compliance with this rule is expected.

Rule 402: Nuisance (May 7, 1976)

This rule requires that a person not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which cause, or have a natural tendency to cause injury or damage to business or property.

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;"><i>STATIONARY SOURCE COMPLIANCE DIVISION</i></p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 10
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

There are no nuisance reports on this tank. Storage of Hydrobate in this external floating roof tank is not expected to increase the nuisance potential of the tank. Compliance with this rule is expected.

Rule 463: Storage of Organic Liquids (May 6, 2005)

This rule is applicable to any above-ground stationary tank with a capacity of 75,000 liters (19,815 gallons) or greater used for storage of organic liquids, and any above-ground tank with a capacity between 950 liters (251 gallons) and 75,000 liters (19,815 gallons) used for storage of gasoline. Tank 1012 is subject to this rule since it stores organic liquids and has a storage capacity of more than 600,000 barrels. This tank must comply with the specific Rule 463 requirements for roof type, seal type, and roof opening fittings/controls during times when the tank is storing an organic liquid with a true vapor pressure of 0.5 psia or greater. The tank complies with these specifications. Rule 1178 has more specific and stringent requirements for the seal type and the fittings/controls on roof openings. A more detailed discussion of the specific tank seals and fittings is contained in the Rule 1178 evaluation.

One requirement that is different for Rule 463 is the requirement at 463(c)(1)(D) that all openings in the roof except pressure vacuum valves “shall be equipped with a cover, seal or lid. The cover, seal, or lid shall at all times be in a closed position, with no visible gaps, except when the device or appurtenance is in use”. This requirement is applicable to any EFR tank that is storing a commodity with a vapor pressure of 0.5 psia or greater at actual storage conditions. As specified in condition E440.9, the slotted guidepole must be equipped with a float when a commodity with a true vapor pressure greater than or equal to 0.5 psia is stored in the tank. The float may be removed when storing a commodity with a true vapor pressure less than 0.5 psia. A pole float will be required when storing Hydrobate because the vapor pressure of this commodity is greater than 0.5 psia.

Compliance with this rule is expected.

Regulation IX: Standards of Performance for New Stationary Sources (NSPS)

40CFR60: Subpart K (Construction, Reconstruction or Modification after 6-1-73 and prior to 5-19-78)

40CFR60: Subpart Ka (Construction, Reconstruction or Modification after 5-18-78 and prior to 7-23-84)

40CFR60: Subpart Kb (Construction, Reconstruction or Modification after 7-23-84)

This tank is subject to NSPS Subpart Ka since it was constructed under PC AN C18858, which was issued in 1980. As discussed below, this tank is subject to 40CFR63 Subpart CC as a Group 1 storage tank. It is specified in §63.640(n)(5) that a Group 1 storage tank that is also subject to 40CFR60 Subparts K or Ka is only required to comply with the provisions of 40CFR63 Subpart CC.

Regulation X: National Emission Standards for Hazardous Air Pollutants (NESHAPS)

40CFR63: Subpart CC: National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (October 28, 2009)

This Subpart applies to petroleum refining sources and related emission sources that are specified in section 63.640 (c) (5) through (c) (7) [e.g. miscellaneous process vents (except for FCCU, SRU, and CRU vents), storage vessels, wastewater stream, equipment leaks, gasoline loading racks, marine vessel loading, etc.] that are located in a major source and emit or have equipment

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;"><i>STATIONARY SOURCE COMPLIANCE DIVISION</i></p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 11
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

contacting one or more of the hazardous air pollutants (HAPs) listed in Table 1 of this subpart. This subpart took effect on August 18, 1998 and was last amended on October 28, 2009.

This storage tank will be subject to this MACT standard as a Group 1 storage vessel. A Group 1 storage vessel is defined as a “storage vessel at an existing source that has a design capacity greater than or equal to 177 cubic meters (46728 gallons) and stored-liquid maximum vapor pressure greater than or equal to 10.4 kilopascals (1.5 psia) and stored-liquid annual average true vapor pressure greater than or equal to 8.3 kilopascals (1.2 psia) and an annual average organic HAP concentration greater than 4 percent by weight.”

The storage tank provisions of this NESHAP are specified at §63.646. This section of the regulation references 40CFR 63.119 through 63.121 [MACT Subpart G for the Synthetic Organic Chemical Manufacturing Industry] for many of the storage tank requirements. The roof related requirements are specified at §63.119(c)(1) and §63.646(f). These requirements are summarized in the following paragraphs.

§63.119(c)(1) - Each external floating roof shall be equipped with primary and secondary seals with the primary seal being either a metallic shoe seal or a liquid mounted seal.

§63.646(c)(1) – This section specifies the following requirements:

- (1) If a cover or lid is installed on an opening on a floating roof, the cover or lid shall remain closed except when the cover or lid must be open for access.
- (2) Rim space vents are to be set to open only when the floating roof is not floating or when the pressure beneath the rim seal exceeds the manufacturer's recommended setting.
- (3) Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.

Tank 1012 complies with all of these requirements. The tank is currently designated as a Group 2 tank in the “Emissions and Requirements” column of the permit. This designation will be changed to Group 1. Compliance with the Group 1 tank requirements of this regulation is expected.

Regulation XI: Source Specific Standards

Rule 1149: Storage Tank Degassing (May 2, 2008)

1149(c)(1) contains the requirement that VOC emissions be controlled during cleaning /degassing activities for all tanks that meet the volume / vapor pressure thresholds specified in this section. The threshold levels are:

- Volume > 39,630 gallons with Reid vapor pressure (RVP) > 2.6 psi, or
- Volume between 19,815 gallons and 39,630 gallons with RVP > 3.9 psi

Tank 1012 is subject to the requirements of this regulation whenever the RVP of the commodity being stored exceeds 2.6 psi. The permit includes condition S13.3, which specifies that the tank is subject to the applicable requirements of Rule 463, 1149 and 1178, and condition K67.52, which specifies that the applicant must keep records according to Rule 1149. Compliance with the requirements of this regulation is expected.

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;">STATIONARY SOURCE COMPLIANCE DIVISION</p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 12
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

Rule 1178: Further Reductions of VOC emissions from Storage Tanks at Petroleum Facilities (April 7, 2006)

This rule is applicable to this facility since it is a petroleum refinery with facility wide VOC emissions exceeding the 20 ton/year VOC threshold. This rule applies to all aboveground storage tanks that have capacity equal to or greater than 75,000 liters (19,815 gallons) and are used to store organic liquids with a true vapor pressure greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions. Tank 1012 is subject to this rule.

The roof opening/fittings and roof seal requirements for external floating roof tanks are specified at §1178(d)(1)(A). These requirements are summarized in the table below. This table also shows the number of each fitting type for Tank 1012. The tank currently complies with all of these requirements.

Summary of Proposed Roof Opening / Fitting Controls and Seals

Roof Opening / Fitting or Seal Type	Roof Seal and Opening/Fitting Configuration		Applicable Rule 1178 Citation
	No	Type	
Access Hatch	5	Cover: bolted & gasketed	1178(d)(1)(A)(i)
Automatic Gauge Float Well	1	Cover: bolted & gasketed	1178(d)(1)(A)(i)
Gauge Hatch / Sample Well	2	Weighted mechanical actuation; Cover: gasketed.	1178(d)(1)(A)(ii)
Roof Legs	144	Adjustable; gasket or impervious sock cover	1178(d)(1)(A)(iii)
Rim Vent	0	Gasketed	1178(d)(1)(A)(iv)
Vacuum Breaker	3	Weighted mechanical actuation; Gasketed	1178(d)(1)(A)(v)
Roof Drain	4	Slotted membrane fabric cover that covers at least 90 percent of the area of the opening.	1178(d)(1)(A)(vi)
Slotted Guidepole Well & Guidepole	1	Gasketed cover, pole wiper and pole sleeve	1178(d)(1)(A)(ix)
Slotted Guidepole Well & Guidepole (w/ pole float)	1	Gasketed cover, pole wiper, and pole float wiper.	1178(d)(1)(A)(x)
Primary Seal	1	Mechanical Shoe or liquid mounted	1178(d)(1)(B)(i)
Secondary Seal	1	Rim mounted and shall not be attached to the primary seal.	1178(d)(1)(B)(ii)

It is specified in §1178(d)(2)(A) that a dome cover shall be installed on all external floating roof tanks that contain organic liquids having true vapor pressure (TVP) greater than or equal to 3 psia as reported in the Annual Emissions Report pursuant to Rule 301 - Permit Fees for the emission inventory year 2000 (Phase I tanks). External floating roof tanks permitted to contain more than 97% by volume crude oil are exempt from this doming requirement per §1178(j). Also, as specified in §1178(d)(2)(C), an operator may accept permit conditions to limit the true

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;"><i>STATIONARY SOURCE COMPLIANCE DIVISION</i></p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 13
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

vapor pressure of the organic liquids stored in the tanks to lower than 3 psia in lieu of doming a tank.

Tank 1012 is not subject to the doming requirements of this rule since it is limited to the storage of crude oil or FCC feed with a TVP less than 3 psia. The addition of Hydrobate with a TVP less than 3 psia as a permitted commodity for this tank does not impact compliance with the requirements of this regulation.

Compliance with the requirements of this regulation is expected.

Regulation XIII: New Source Review

Rule 1303: Requirements (December 6, 2002)

This rule allows the Executive Officer to deny a Permit to Construct for any new, modified or relocated source which results in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia, unless BACT is used. This rule also requires modeling and offset (among other requirements) if there is a net increase in any nonattainment air contaminants for any new or modified source. The definition of “Source” in Rule 1302(ao) is “any permitted individual unit, piece of equipment, article, machine, process, contrivance, or combination thereof, which may emit or control an air contaminant. This includes any permit unit at any non-RECLAIM facility and any device at a RECLAIM facility.”

The South Coast Air Basin (SOCAB) is designated in attainment for CO, NO_x and SO_x. The following are currently considered nonattainment air contaminants: NO_x, SO_x, PM₁₀, and VOC. VOC & NO_x are included since they are precursors for ozone. VOC, NO_x, and SO_x are included as PM₁₀ precursors. NO_x and SO_x emissions from RECLAIM Facilities are regulated under Regulation XX (RECLAIM). New Source Review (NSR) requirements for NO_x and SO_x are specified in Rule 2005.

None of the requirements of this regulation, which are summarized below, are triggered by the subject change of condition application since there is not any increase in the emission of CO, PM10 or VOC.

1303(a)(1): Best Available Control Technology (BACT): Any new or modified source which results in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia, must employ BACT for the new or relocated source or for the actual modification to an existing source. Per District policy, BACT is required for any increase in emissions that exceeds 1.0 lb per day on a maximum daily basis. *Not Applicable.*

1303(b) – The requirements in this section apply to any new or modified source which results in a net emission increase of any nonattainment air contaminant. These requirements are not applicable since there is no increase in emissions for the proposed change of condition.

1303(b)(1): Modeling - The applicant must substantiate with modeling that the new facility or modification will not cause a violation, or make significantly worse an existing violation of any state or national ambient air quality standards at any receptor location in the District. *Not Applicable.*

1303(b)(2): Offsets – Unless exempt from offsets requirements pursuant to Rule 1304, emission increases shall be offset by either Emission Reduction Credits approved pursuant to

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;">STATIONARY SOURCE COMPLIANCE DIVISION</p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 14
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

Rule 1309, or by allocations from the Priority Reserve. Per District policy, offsets are required for any increase in emissions that exceeds 0.5 lb per day on a maximum daily basis. *Not Applicable.*

1303(b)(3) - Sensitive Zone Requirements: This section pertains to Emission Reduction Credits (ERCs) for facilities in the South Coast Air Basin (SOCAB). Except for credits that are obtained from the Priority Reserve, facilities are subject to the Sensitive Zone requirements (H&SC Section 40410.5) for ERCs. A facility in zone 1 may obtain ERCs originated in zone 1 only, and a facility in zone 2A may obtain ERCs from either zone 1 or zone 2A. *Not Applicable.*

1303(b)(4) - Facility Compliance: The facility must be in compliance with all applicable rules and regulations of the District. *Not Applicable.*

1303 (b)(5) - Major Polluting Facilities: Any new major polluting facility or major modification at an existing major polluting facility must comply with the requirements summarized below. A major modification is defined in 1302(r) as any modification at an existing major source that will cause

- an increase of one pound per day or more, of the facility's potential to emit (PTE) for NO_x or VOC if the facility is located in the SOCAB, or
- an increase of 40 tons per year or more, of the facility's PTE for SO_x, or
- an increase of 15 tons per year or more, of the facility's PTE for PM₁₀; or,
- an increase of 50 tons per year or more, of the facility's PTE for CO.

(A) *Alternative Analysis* – Applicant must conduct an analysis of alternative sites, sizes, production processes, and environmental control techniques for such proposed source and demonstrate that the benefits of the proposed project outweigh the environmental and social costs associated with that project. *Not Applicable.*

(B) *Statewide Compliance:* The applicant must demonstrate that all major stationary sources, as defined in the jurisdiction where the facilities are located, that are owned or operated by the applicant in the State of California are subject to emission limitations and are in compliance or on a schedule for compliance with all applicable emission limitations and standards under the Clean Air Act. *Not Applicable.*

(C) *Protection of Visibility* - A modeling analysis for plume visibility is required if the net emission increase exceeds 15 tons/yr of PM₁₀ or 40 tons/yr of NO_x. *Not Applicable.*

(D) *Compliance through California Environmental Quality Act-* As discussed previously, CEQA requirements have been fulfilled. *Not Applicable.*

Regulation XIV: Toxic Air Contaminants

Rule 1401 New Source Review of Toxic Air Contaminants (June 5, 2009)

Requirements – Rule 1401 contains the following requirements:

- 1) (d)(1) *MICR and Cancer Burden* - The cumulative increase in MICR which is the sum of the calculated MICR values for all toxic air contaminants emitted from the new, relocated or modified permit unit will not result in any of the following:
 - (A) an increased MICR greater than one in one million (1.0×10^{-6}) at any receptor location, if the permit unit is constructed without T-BACT;

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;">STATIONARY SOURCE COMPLIANCE DIVISION</p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 15
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

- (B) an increased MICR greater than ten in one million (1.0×10^{-5}) at any receptor location, if the permit unit is constructed with T-BACT;
- (C) a cancer burden greater than 0.5.

- 2) (d)(2) *Chronic Hazard Index* - The cumulative increase in total chronic HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.
- 3) (d)(3) *Acute Hazard Index* - The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.

According to 1401(f)(3), for the purpose of determining MICR, cancer burden and chronic HI due to a modified permit unit, the increase in emissions shall be calculated based on the difference between the total permitted emissions after the modification and the total permitted emissions prior to the modification as stated in the permit conditions; or if there are no existing permit conditions that limit emissions, the average annual emissions which have occurred during the two-year period immediately preceding the date of the complete permit application.

According to 1401(f)(4), for the purpose of determining acute HI due to a new, relocated or modified permit unit, the total emissions from a permit unit shall be calculated on a maximum hourly basis from permit conditions which directly limit the emissions or, when no such conditions exist, from: (A) the maximum rated capacity; (B) the maximum hourly emissions; and (C) the physical characteristics of the materials processed. Therefore, for evaluation of acute risk, the pre-modification TAC emissions are not taken into account.

Analysis –

The following table, which shows the total TACs and incremental increase in TACs for Hydrobate storage, is copied from the *Calculation Section* of this evaluation.

TAC Emissions for Hydrobate and Crude Oil Storage

Toxic Air Contaminant	Estimated TAC Emissions			Incremental TAC Emission Increase	
	Crude Oil	Hydrobate		Hydrobate	
	(lb/yr)	(lb/yr)	(lb/hr)	(lb/yr)	(lb/hr)
Benzene	4.5	18.9	2.2×10^{-3}	14.4	1.6×10^{-3}
Ethyl benzene	2.5	8.6	9.8×10^{-4}	6.1	7.0×10^{-4}
Hexane	136	25.9	3.0×10^{-3}	0	0
Toluene	5.2	49.2	5.6×10^{-3}	44	5.0×10^{-3}
Xylene	9.0	32.0	3.7×10^{-3}	23	2.6×10^{-3}

A Tier 1 screening assessment was performed for chronic/cancer and acute risk. A copy of the printouts for the Tier 1 screening is contained [in the engineering file](#). An application passes this screening if the chronic/cancer and acute hazard indices are less than 1. The chronic/cancer hazard and acute hazard indices for this application are 1.63 and 0.00067, respectively. A Tier 2 screening must be performed for cancer/chronic risk since the cancer/chronic hazard indices is greater than 1. The estimated residential and commercial MICR in the Tier 2 screen analysis is 3.7×10^{-7} and 3.4×10^{-8} , respectively. The maximum chronic hazardous indices in the Tier 2 screen

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;">STATIONARY SOURCE COMPLIANCE DIVISION</p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 16
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

analysis is .00036. A copy of the printout for the Tier 2 screening is contained [in the engineering file](#). Compliance with the requirements of this regulation is achieved.

Regulation XVII - Prevention of Significant Deterioration (PSD)

The PSD program is the federal New Source Review (NSR) program for pollutants for which an area is in attainment with or unclassified with respect to a National Ambient Air Quality Standard (NAAQS). As discussed earlier, SOCAB is currently designated as attainment with NAAQSs for SO₂, NO₂, CO, and Lead. There are no requirements under this regulation since the proposed change of condition does not cause an increase in the emissions of CO, NO₂, SO₂ or Lead.

Regulation XX: Regional Clean Air Incentive Market (RECLAIM)

This storage tank is not subject to RECLAIM.

Regulation XXX: Title V Permits

The initial Title V permit for the refinery was sent to Chevron on September 29, 2009 with an effective date of October 12, 2009. The permit issued for this tank will be issued as a revision of the Title V permit. Permit revisions are categorized into the following four types: *administrative, minor, de minimis significant and significant*. The review and distribution requirements for each revision type are summarized in the following table.

Title V Permit Revisions: Review and Distribution Requirements

Revision Type	Permit Review and Distribution Requirements		
	EPA Review (45-day)	Public Notice (30-day)	Send Final Permit to EPA
Administrative	No	No	Yes
Minor	Yes	No	Yes
De Minimis Significant	Yes	No	Yes
Significant	Yes	Yes	Yes

As defined in Rule 3000, a minor Title V permit revision is any revision that:

- (1) does not require or change a case-by-case evaluation of: reasonably available control technology (RACT) pursuant to Title I of the federal Clean Air Act; or maximum achievable control technology (MACT) pursuant to 40 CFR Part 63, Subpart B;
- (2) does not violate a regulatory requirement;
- (3) does not require any significant change in monitoring terms or conditions in the permit;
- (4) does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit;
- (5) does not result in an emission increase of RECLAIM pollutants over the facility starting Allocation plus nontradeable Allocations, or higher Allocation amount which has previously undergone a significant permit revision process;
- (6) does not result in an increase in emissions of a pollutant subject to Regulation XIII - New Source Review or a hazardous air pollutant;
- (7) does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement;

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p style="text-align: center;"><i>STATIONARY SOURCE COMPLIANCE DIVISION</i></p> <p style="text-align: center;">APPLICATION PROCESSING AND CALCULATIONS</p>	PAGES 19	PAGE 17
	APPL. NO. 504577	DATE 6/11/10
	PROCESSED BY R. Sanford	CHECKED BY

- (8) is not an installation of a new permit unit subject to a New Source Performance Standard (NSPS) pursuant to 40 CFR Part 60, or a National Emission Standard for Hazardous Air Pollutants (NESHAP) pursuant to 40 CFR Part 61 or 40 CFR Part 63; and,
- (9) is not a modification or reconstruction of an existing permit unit, resulting in new or additional NSPS requirements pursuant to 40 CFR Part 60, or new or additional NESHAP requirements pursuant to 40 CFR Part 61 or 40 CFR Part 63; or,
- (10) incorporates an existing general permit, as defined in subdivision (e) of Rule 3004, and its associated requirements, into another Title V permit.

A de minimis significant Title V permit revision meets all of the requirements above with the exception that it does result in an increase in the emission of one or more non-RECLAIM pollutants or hazardous air pollutants (HAPs) and the total cumulative emission increase since issuance of the initial Title V permit or a significant Title V revision is not greater than the following thresholds:

HAP: 30 lb/day
CO: 220 lb/day
VOC: 30 lb/day
PM10: 30 lb/day

As seen in the *Calculation Section*, the increase in estimated maximum potential TAC emissions for the storage of Hydrobate is 88 lb/year (0.24 lb/day). All of these TACs are also HAPs. With this increase in HAP emissions, this Title V permit revision meets all of the requirements of a de minimis significant revision. The cumulative increase in HAP emissions since the most recent significant Title V permit revision, which was issued on May 14, 2010, will be 0.28 lb/day including a HAP emission increase of 0.04 lb/day under A/N 511207 for which a permit to operate (PO) will be proposed in a future de minimis significant revision. Note that PO for Tank 1012 under A/N 504577 may be included in the same de minimis significant revision with the PO for Tank 1008 under A/N 511207.

Chevron has submitted Title V permit revision A/N 507648 for processing of this Title V permit de minimis significant revision, which will be sent to EPA for a 45-day review. Public notice is not required.

RECOMMENDATION:

Based on the foregoing evaluation, it is expected that the subject application will comply with all applicable District Rules and Regulations. It is recommended that, a Permit to Operate, Section D of the RECLAIM/Title V facility permit, be issued for the proposed change of permit condition.



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

STATIONARY SOURCE COMPLIANCE DIVISION

APPLICATION PROCESSING AND CALCULATIONS

PAGES
19

PAGE
18

APPL. NO.
504577

DATE
6/11/10

PROCESSED
BY R. Sanford

CHECKED
BY

Appendix A: List of Chevron NOV/NCs Issued Since January 1, 2008

NOTICE NO.	NOTICE TYPE	VIOLATION DATE	STATUS	VIOLATION
P48119	NOV	1/10/2008	Closed on 11/25/08	FAILURE TO OPERATE F-105 AND F-205 ABOVE 1400 DEG F PER CONDITION B163.5 IN THE FACILITY PERMIT TO OPERATE, ID# 800030.
P48123	NOV	1/29/2008	Closed on 9/2/08	1) Discharge of air contaminants > 40% opacity into the atmosphere for more than three minutes in one hour from K-25. (2) Discharge of air contaminants > 20% opacity into the atmosphere for more than three minutes in one hour from K-25.
P48124	NOV	2/24/2008	Closed on 9/2/08	Failure to ensure all vent gases from the SNR were vented to the co control ground flare (C4116) during the SNR startup per Administrative Condition #4 in Section# of the Permit to Operate, ID# 800030.
P52764	NOV	4/12/2008	Closed on 11/25/08	F/P 800030, PROCESS 5 SYSTEM 1 - OPERATING CONTRARY TO CONDITION S15.10
P12140	NOV	7/29/2008	Closed on 5/19/09	VOC LEAKS >50000 PPM RULE 1173 (d)(1)(B) - 9 COUNTS. 40 CFR FF 61.344(a)(1)(i)(A) MEASURABLE LEAKS FROM SEPARATOR COVER > 500 PPM - 4 COUNTS.
P12141	NOV	7/30/2008	Closed on 5/19/09	VOC LEAKS GREATER THAN 50,000 PPM - 21 COUNT VIOLATION RULE 1173(d)(1)(B)
P12142	NOV	7/31/2008	Closed on 5/19/09	OPEN ENDED LINES IN CRUDE #2 LSFO - 1 COUNT. 40 CFR 61.346(b)(1) PROCESS DRAIN WITHOUT WATER SEAL CONTROL.
P48721	NOV	10/2/2008	Closed on 6/18/09	1) Failure to operate refinery flare in a smokeless manner; 2) Exceeding Ringlemann 2 emissions for more than 5 minutes in one hour. (FCC Flare)
D05317	NC	4/24/2009	In Compliance	PROVIDE INFORMATION REGARDING EMERGENCY POWER CAPACITY AND PROTOCOL DURING POWER OUTAGES BY THE UTILITIES.
P48724	NOV	6/22/2009	In Compliance	EXCEEDING 20 PPMV EMISSION LIMIT ON SELECTIVE CATALYTIC REDUCTION UNIT (DEVICE C2217) ON AUXILIARY BOILER (DEVICE D2216)
D05319	NC	7/10/2009	In Compliance	PROVIDE SOURCE TEST RESULTS FOR AUXILIARY BOILER N43.
D05320	NC	1/20/2010	In Compliance	REPORT VARIOUS AND PROCESS EQUIPMENT ACCORDING TO PROCESS UNIT GUIDELINES.
P48725	NOV	2/23/2010	In Compliance	1) Light service leak in excess of 50,000 ppm - 1 count, (2) Leak at water separator cover exceeding 500ppm -



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

STATIONARY SOURCE COMPLIANCE DIVISION

APPLICATION PROCESSING AND CALCULATIONS

PAGES
19

PAGE
19

APPL. NO.
504577

DATE
6/11/10

PROCESSED
BY R. Sanford

CHECKED
BY

NOTICE NO.	NOTICE TYPE	VIOLATION DATE	STATUS	VIOLATION
				13 counts, (3) Equipment operating contrary to permit conditions and not in good operating condition - 2 counts.
P48726	NOV	2/23/2010	In Compliance	Equipment not in good operating condition - 3 counts.
P48727	NOV	2/23/2010	In Compliance	Light service leaks in excess of 50,000 ppm - 2 counts.
P48728	NOV	3/02/2010	In Compliance	EMISSIONS FROM WASTE SYSTEM IN EXCESS OF 500 PPM - 4 COUNTS.