

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT  STATIONARY SOURCE COMPLIANCE DIVISION  PERMIT APPLICATION PROCESSING AND CALCULATIONS	PAGES 3	PAGE 1
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**EVALUATION REPORT FOR TITLE V PERMIT REVISION**

**APPLICANT'S NAME:**  
ARCO TERMINAL SERVICES CORP.

**ID NO. 800286**

**MAILING ADDRESS**  
1300 PIER B STREET  
LONG BEACH, CA 90813

**EQUIPMENT ADDRESS**  
2350 OBISPO AVE.  
SIGNAL HILL, CA 90755

**EQUIPMENT DESCRIPTION:**

AN518245

**MODIFICATION OF:**

TANK NO. 101, INSULATED, CAPACITY 100,000 BBL, 120' DIA. x 48' H., INTERNAL FLOATING ROOF, WITH A CATEGORY A MECHANICAL SHOE TYPE PRIMARY SEAL AND A SHOE MOUNTED SECONDARY SEAL.

**BY ALTERING THE EQUIPMENT DESCRIPTION TO:**

REMOVE THE WORD "INSULATED" AND CHANGE THE SEAL DESCRIPTION TO A VAPOR MOUNTED FLEXIBLE WIPER TYPE PRIMARY SEAL AND A RIM MOUNTED SECONDARY SEAL".

AN518246

**MODIFICATION OF:**

TANK NO. 102, INSULATED, CAPACITY 100,000 BBL, 120' DIA. x 48' H., INTERNAL FLOATING ROOF, WITH A CATEGORY A MECHANICAL SHOE TYPE PRIMARY SEAL AND A SHOE MOUNTED SECONDARY SEAL.

**BY ALTERING THE EQUIPMENT DESCRIPTION TO:**

REMOVE THE WORD "INSULATED" AND CHANGE THE SECONDARY SEAL MOUNTING LOCATION FROM "SHOE MOUNTED" TO "RIM MOUNTED".

AN518247

**MODIFICATION OF:**

TANK NO. 108, INSULATED, CAPACITY 100,000 BBL, 120' DIA. x 48' H., INTERNAL FLOATING ROOF, WITH A CATEGORY A MECHANICAL SHOE TYPE PRIMARY SEAL AND A SHOE MOUNTED SECONDARY SEAL.

**BY ALTERING THE EQUIPMENT DESCRIPTION TO:**

REMOVE THE WORD "INSULATED" AND CHANGE THE SECONDARY SEAL MOUNTING LOCATION FROM "SHOE MOUNTED" TO "RIM MOUNTED".

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## **HISTORY**

### AN 518245

Tank 101 is an insulated internal floating roof storage tank. BP/ARCO has decided to remove the insulation on the external tank shell. AN 518245 was filed to remove "insulated from the permit description. The applicant also stated that Tank 101 had no secondary seal and asked to have it removed from the permit description.

Review of the Tank 101 permitting history (AN197422) uncovered a Settlement Agreement between AQMD, ATSC and Edgington Oil Co. dated Dec. 9, 1988. The Agreement stemmed from an NOV (Z19639, 10/8/87) issued to Edgington Oil Tank 101 for a Rule 203 violation before ownership of the Hathaway Facility including Tank 101 was transferred to ATSC. The Agreement required ATSC to meet the floating roof seal requirements in Rule 463 for IFRTs to wit: a liquid mounted primary seal or a dual seal system consisting of a primary and a secondary seal. The Tank Form 400-E-18 filed with AN518245 indicated Tank 101 had a vapor mounted primary seal and no secondary seal. It was therefore not compliant with either Rule 463 or the Settlement Agreement. Further inquiry in this matter documented by a series of emails and attachments including photographs of Tank 101 seals (appended to this evaluation) has demonstrated that Tank 101 does in fact have a primary seal and a secondary seal and is therefore in compliance. AN 518245 will be used to remove the term "insulated from the equipment description. The reference to a secondary seal will remain in the equipment description.

### ANs, 518246 & 518247

These are applications to change the equipment descriptions for Tanks 102 & 108 (respectively). Both of these tanks are insulated IFRTs. The tanks are currently used to store products under ambient conditions and the insulation is being removed to inspect the external shell of the tanks. If extensive repair of the shell exterior is necessary, the tanks may be taken out of service to complete the repair. BP does not plan to re-insulate the tanks and these applications were filed to remove the term "insulated" from the equipment descriptions in the TV Permit. Also, the applicant has indicated that the secondary seal location on the floating roofs of these tanks is inaccurately described as "shoe mounted" and requested that be changed to "rim mounted" to reflect the correct location of the secondary seals.

The requested changes will be considered minor TV permit revisions.

## **PROCESS DESCRIPTION**

These tanks are used to store Isooctane, Alkylate, Diesel, Gasoline and other petroleum distillates with a true vapor pressure less than 11 psia. The operator has indicated that Tank 101 has only been used for storage of non-Rule (low VP) petroleum distillates and will continue in that service.

## **CALCULATIONS/EMISSIONS**

### AN518246 & AN518247

The removal of the insulation from the tank shells and the changes to the mounting locations for the tanks' secondary seals may have some effect on ROG emissions however the changes are not quantifiable using the conventional methods of tank emission calculation by the EPA Tanks 4.09d program.

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**RULES EVALUATION:**

**Rule 212** The removal of the insulation from the tank shell does not affect PTE. Public notice is not required.

**Rule 401** No visible emissions are expected as a result of these modifications.

**Rule 402** Operation of the equipment is not expected to result in a public nuisance. Compliance is expected.

**Reg IX** New Source Performance Standards  
Not applicable.

**Reg X** National Emission Standards for Hazardous Air Pollutants  
Not applicable.

**Rule 463** This rule regulates VOC emissions from storage tanks used for organic liquid storage. These tanks are subject to Rule 463. There are no changes that will prevent these tanks from operation in accordance with this Rule.

**Rule 1303** There is no increase in PTE. Rule 1303 is not applicable.

**Rule 1401** There is no increase in PTE. There is therefore no need to re-evaluate risk under Rule 1401.

**Reg XVII** No net increase in PTE, further evaluation is not required.

**Reg XXX** This facility is subject to Reg. XXX and the Initial Title V Permit has been issued. The revisions to these permits are minor changes and as such are not subject to an EPA 45 day review. They will be included in Section D, Revision 1 under TV Permit Application No. 510632. Several other applications included in Revision 1 are minor changes so Revision 1 will require 45 day review .

**DISCUSSION**

The changes requested by these applications are administrative and have no impact on tank operation or emissions that can be calculated using the EPA Tanks 4.09d program. Tanks 101, 102, and 108 have conditions that require compliance with Rules 463 and 1178.

**RECOMMENDATION**

Revise Section D of the TV Permit to reflect the changes to Devices D-134 (Tank 101), D-12 (Tank 102) and D-150 (Tank 108).

**CONDITIONS:**

NO NEW CONDITIONS - See Facility ID 800286 Title V Permit Section D Revision 1 - Equipment Specific Conditions