



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

November 9, 2011

Mr. Gerardo C. Rios  
Chief of Permit Operation  
U. S. EPA, Region IX, AIR 3  
75 Hawthorne Street  
San Francisco, CA 94105-3901

Dear Mr. Rios:

California Steel Industries (ID 046268) has proposed to revise their Title V Permit by modifying the facilities fuel dispensing equipment. California Steel is a steel rolling mill and is located at 14000 San Bernardino Avenue, Fontana, CA 92335. This proposed permit revision is considered a "de minimus significant" permit revision to their Title V permit. Attached for your review are the evaluation and the proposed permit. With your receipt of the proposed Title V permit revision today, we will note that the EPA 45-day review period will begin on November 9, 2011.

If you have any questions or need additional information regarding the proposed permit revision, please contact Mr. Randy Matsuyama at (909) 396-2551 or Ms. Monica Fernandez-Neild at (909) 396-2202.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian L. Yeh', is written over a faint, larger version of the same signature.

Brian L. Yeh  
Senior Manager  
Engineering & Compliance Division

BLY:mfn

Enclosure

## FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
<b>Process 15: FUEL STORAGE AND DISPENSING FACILITY</b>					P28.1
<b>System 1: GASOLINE FUEL STATION</b>					
TANK, GASOLINE, ABOVEGROUND, WITH PRESSURE/VACUUM RELIEF VALVE, SUBMERGED FILL TUBE (G-70-148A), 10000 GALS; DIAMETER: 7 FT 11 IN; LENGTH: 30 FT 8 IN WITH A/N:  FUEL DISPENSING NOZZLE, BALANCE RETRACTOR PHASE II CONTROL, (G-70-52-AM), 2 GASOLINE NOZZLES DISPENSING 2 PRODUCTS	D161				D330.1, E118.1, J373.2

- \* (1) (1A) (1B) Denotes RECLAIM emission factor
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (3) Denotes RECLAIM concentration limit
- (4) Denotes BACT emission limit
- (5) (5A) (5B) Denotes command and control emission limit
- (6) Denotes air toxic control rule limit
- (7) Denotes NSR applicability limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (9) See App B for Emission Limits
- (10) See section J for NESHAP/MACT requirements

\*\* Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

## FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

#### FACILITY CONDITIONS

F10.1 Material(s) that contain the following compound(s) shall not be used in this facility;

0.004 percent or more of arsenic and 0.002 percent or more of cadmium by weight

No scrap other than clean non-ferrous scrap or rerun scrap shall be melted at this facility

[RULE 1407, 7-8-1994]

F14.1 The operator shall not use diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

#### PROCESS CONDITIONS

P28.1 Except for diesel transfers, Phase I vapor recovery systems shall be in full operation whenever fuel is being transferred into storage tanks.

Except for diesel transfers, Phase II vapor recovery systems shall be in full operation whenever fuel is being transferred into motor vehicles, as defined in Rule 461.

All Phase I and Phase II vapor recovery equipment at this facility shall be installed, operated and maintained to meet all California Air Resources Board certification requirements.

[RULE 461, 6-3-2005; RULE 461, 3-7-2008; RULE 461, Balance Conditions, 1-9-2004]

## FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

**[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]**

[Devices subject to this condition : D12, D13, D14, D24, D53, D55, D56, D84, D133, D151, D152, D153, D156, C163, D178, D179, D180, D181, D182, D183, D184, D185, D186, D187, D188]

D328.1 The operator shall determine compliance with the CO emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100.1 or 10.1; or (b) conducting a test at least annually using a portable analyzer and AQMD-approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with Rule 1146. The operator shall comply with all general testing, reporting, and recordkeeping requirements in Sections E and K of this permit.

**[RULE 1146, 11-17-2000; RULE 1146, 9-5-2008; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 407, 4-2-1982]**

[Devices subject to this condition : D6, D7, D140, D141]

D330.1 The operator shall have a person that has been trained in accordance with Rule 461 conduct a semi-annual inspection of the gasoline transfer and dispensing equipment. The first inspection shall be in accordance with Rule 461, Attachment B, the second inspection shall be in accordance with Rule 461, Attachment C, and the subsequent inspections shall alternate protocols. The operator shall keep records of the inspection and the repairs in accordance to Rule 461 and Section K of this Permit.

**[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 461, 6-3-2005; RULE 461, 3-7-2008]**

[Devices subject to this condition : D161]

## FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D212, D213, D214, D215, D216, D217, D218, D219]

- E71.20 The operator shall not operate this equipment if the percent by weight of Chromium VI or Chromium III compounds in the passivation solution (Oakite Okemcoat concentrate) used exceeds 10 percent.

[RULE 1401, 12-7-1990]

[Devices subject to this condition : D154]

- E102.1 The operator shall discharge dust collected in this equipment only into closed containers.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C57, C59, E137]

- E114.1 The operator shall not use this equipment in conjunction with any utility voluntary demand reduction program.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D9, D11, D200, D201, D228, D234]

- E118.1 The operator shall ensure that all openings to the atmosphere on the tank and on the tank truck shall be closed during a gasoline transfer to the storage tank.

[RULE 461, 6-3-2005; RULE 461, 3-7-2008; RULE 461, Balance Conditions, 1-9-2004]

## FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

**The operator shall comply with the terms and conditions set forth below:**

[Devices subject to this condition : D161]

E147.1 The operator shall not conduct fluxing or refining in this equipment.

[**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001**]

[Devices subject to this condition : D133, D151, D152, D153]

E147.2 The operator shall not conduct metal melting operation in this equipment.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002**]

[Devices subject to this condition : D178, D179, D180, D181, D182, D183, D184, D185, D186, D187, D188]

E147.3 The operator shall not conduct refining and/or fluxing operation in this equipment.

[**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002**]

[Devices subject to this condition : D178, D179, D180, D181, D182, D183, D184, D185, D186, D187, D188]

E158.1 The operator shall maintain a continuous overflow of water from the scrubber sump to prevent build up of contamination.

[**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002**]

## FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[RULE 1415, 10-14-1994; 40CFR 82 Subpart F, 5-14-1993]

[Devices subject to this condition : E157]

#### J. Rule 461

J373.2 The operator shall comply with the following gasoline transfer and dispensing requirements:

## FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

**The operator shall comply with the terms and conditions set forth below:**

a). All permit conditions applicable to the equipment described in the previous Permit to Operate (N9876, A/N 347553) shall remain in effect until the new or modified equipment is constructed and operated as described in this new permit. This permit to construct/operate shall become invalid if the modification as described in the equipment description has not been completed within one year from the issue date.

If the modifications have not been completed within one year from the issue date of the permit, a written request shall be submitted to the AQMD (Attn: Randy Matsuyama) to reinstate the previously inactivated permit to operate. A new application shall be filed if there are plans to continue with the modification. Furthermore, this condition does not allow any time extensions to any modifications required by the California Air Resources Board or AQMD.

b). The District at its discretion may wish to witness the installation and/or performance testing of the new vapor recovery equipment. At least 72 hours prior to the installation of the equipment and any of the mentioned testing requirements in this permit, the applicant shall notify the AQMD by e-mail at R461testing@aqmd.gov. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility and the scheduled start and completion dates of the test.

c). New equipment installations and subsequent service and repairs for any certified component for which this permit was issued, shall only be performed by a current and certified person who has successfully completed the manufacturer's training course and appropriate international code council (ICC) certification. Completion of any AQMD training course does not constitute as a substitute for this requirement. Proof of successful completion of a manufacturer training course shall be with the manufacturer.

d). At least seventy-two (72) hours prior to back-filling any underground storage tank or piping, the SCAQMD shall be notified by e-mail at r461backfill@aqmd.gov or by facsimile at telephone number (909) 396-3606. Such notification shall include the name of the owner or operator; the name of the contractors; the location of the facility; and the scheduled start and completion dates of the back-filling procedure.

## FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

**The operator shall comply with the terms and conditions set forth below:**

The backfilling procedure shall not commence until inspected by a District representative.

e). A static pressure leak decay test shall be conducted to demonstrate that the storage tank, the remote and/or nozzle vapor recovery check valves, associated vapor return piping and fittings are free from vapor leaks. The test shall be conducted in accordance with CARB Test Procedure Method TP-201.3 as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test.

f). The Phase II vapor recovery systems shall be installed, operated, and maintained such that the maximum allowable pressure through the system including nozzle, vapor hose, swivels, and underground piping does not exceed the dynamic back pressures described by the California Air Resources Board (CARB) Executive Order by which the system was certified:

Nitrogen Flowrates (CFH)	Dynamic Back Pressure (Inches of Water)
60	0.35
80	0.62

Dynamic Back pressure tests shall be conducted to determine the Phase II system vapor recovery back pressures. The tests shall be conducted in accordance with CARB test procedure TP-201.4, methodology 1; as a performance test and as a reverification test. Results shall be submitted to the AQMD Office of Engineering and Compliance, within seventy-two (72) hours of the test.

g). If the CARB Executive Order requires the installation of a liquid removal device, a liquid removal rate test shall be conducted to demonstrate the removal of gasoline from the vapor passage of the coaxial hose. The test shall be conducted in accordance with CARB Test Procedure Method TP-201-6C as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of the test.

h). The AQMD shall be notified by e-mail at [r461testing@aqmd.gov](mailto:r461testing@aqmd.gov) or by facsimile

## FACILITY PERMIT TO OPERATE CALIFORNIA STEEL INDUSTRIES INC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

**The operator shall comply with the terms and conditions set forth below:**

at telephone number (909) 396-3606 at least seventy-two (72) hours prior to testing. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the tests to be performed.

i). The testing for the above mentioned tests shall be conducted in accordance with the most recent Rule 461 amendment or CARB Executive Order requirements, whichever is more stringent.

j). All records and test results that are required to be maintained by Rule 461 shall be kept on site and made available to district representatives upon request.

k). By April 1, 2013, the owner/operator of the equipment shall be in full compliance for standing loss control for the vapor recovery system as per the latest version of ARB Executive order VR-301.

l). By July 1, 2014, the owner/operator of this equipment shall submit an application and receive a permit to construct/operate to install and be in full compliance for all Phase I enhanced vapor recovery requirements.

[RULE 461, 6-3-2005; RULE 461, 3-7-2008; RULE 461, Balance Conditions, 1-9-2004]

[Devices subject to this condition : D161]

#### **K. Record Keeping/Reporting**

K40.1 The operator shall provide to the District a source test report in accordance with the following specifications:

Source test results shall be submitted to the District no later than 60 days after the source test was conducted.

## PERMIT TO CONSTRUCT/OPERATE

A/N 526491

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership. If the billing for annual renewal fee (Rule 301.f) is not received by the expiration date, contact the District.

Legal Owner  
or Operator:

CALIFORNIA STEEL INDUSTRIES, INC.  
14000 SAN BERNARDINO AVENUE  
FONTANA, CA 92335

ID 046268

Equipment Location: 14000 SAN BERNARDINO AVENUE, FONTANA, CA 92335

### Equipment Description:

#### Fuel Storage and Dispensing Facility Consisting of:

- 1) 2 - GASOLINE NOZZLES DISPENSING 2 PRODUCTS, EQUIPPED WITH PHASE II VAPOR RECOVERY SYSTEM, BALANCE RETRACTOR (G-70-52-AM).
- 2) 1 - GASOLINE ABOVEGROUND STORAGE TANK, LUBE CUBE ABOVEGROUND TANK (G-70-148-A), RECTANGULAR, 30' - 8" L. X 7' - 11" W. X 7' - 11" H., 10,000 GALLON CAPACITY, EQUIPPED WITH A PRESSURE/VACUUM RELIEF VALVE, AND A SUBMERGED FILL TUBE.

#### Conditions:

1. OPERATION OF THIS EQUIPMENT SHALL BE IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT WAS ISSUED, UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. EXCEPT FOR DIESEL TRANSFERS, PHASE I VAPOR RECOVERY SYSTEMS SHALL BE IN FULL OPERATION WHENEVER FUEL IS BEING TRANSFERRED INTO STORAGE TANKS.
4. EXCEPT FOR DIESEL TRANSFERS, PHASE II VAPOR RECOVERY SYSTEMS SHALL BE IN FULL OPERATION WHENEVER FUEL IS BEING TRANSFERRED INTO MOTOR VEHICLES, AS DEFINED IN RULE 461.
5. ALL PHASE I AND PHASE II VAPOR RECOVERY EQUIPMENT AT THIS FACILITY SHALL BE INSTALLED, OPERATED AND MAINTAINED TO MEET ALL CALIFORNIA AIR RESOURCES BOARD CERTIFICATION REQUIREMENTS.
6. ALL PERMIT CONDITIONS APPLICABLE TO THE EQUIPMENT DESCRIBED IN THE PREVIOUS PERMIT TO OPERATE N9876 SHALL REMAIN IN EFFECT UNTIL THE NEW OR MODIFIED EQUIPMENT IS CONSTRUCTED AND OPERATED AS DESCRIBED IN THIS NEW PERMIT. THIS PERMIT TO CONSTRUCT/OPERATE SHALL BECOME INVALID IF THE MODIFICATION AS DESCRIBED IN THE EQUIPMENT DESCRIPTION HAS NOT BEEN COMPLETED WITHIN ONE YEAR FROM THE ISSUE DATE. IF THE MODIFICATION HAS NOT BEEN COMPLETED WITHIN ONE YEAR

**SAMPLE**

## PERMIT TO CONSTRUCT/OPERATE

A/N 526491

### CONTINUATION OF PERMIT TO CONSTRUCT/OPERATE

FROM THE ISSUE DATE OF THE PERMIT, A WRITTEN REQUEST SHALL BE SUBMITTED TO THE AQMD (ATTENTION: RANDY MATSUYAMA) TO REINSTATE THE PREVIOUSLY INACTIVATED PERMIT TO OPERATE. A NEW APPLICATION SHALL BE FILED IF THERE ARE PLANS TO CONTINUE WITH THE MODIFICATION. FURTHERMORE, THIS CONDITION DOES NOT ALLOW ANY TIME EXTENSIONS TO ANY MODIFICATIONS REQUIRED BY THE CALIFORNIA AIR RESOURCES BOARD OR AQMD.

7. THE DISTRICT AT ITS DISCRETION MAY WISH TO WITNESS THE INSTALLATION AND/OR PERFORMANCE TESTING OF THE NEW VAPOR RECOVERY EQUIPMENT. AT LEAST SEVENTY-TWO (72) HOURS PRIOR TO THE INSTALLATION OF THE EQUIPMENT AND ANY OF THE MENTIONED TESTING REQUIREMENTS IN THIS PERMIT, THE APPLICANT SHALL NOTIFY THE AQMD BY E-MAIL AT [R461TESTING@AQMD.GOV](mailto:R461TESTING@AQMD.GOV). SUCH NOTIFICATION SHALL INCLUDE THE NAME OF THE OWNER OR OPERATOR; THE NAME OF THE CONTRACTOR; THE LOCATION OF THE FACILITY; AND THE SCHEDULED START AND COMPLETION DATES OF THE TESTS TO BE PERFORMED.
8. NEW EQUIPMENT INSTALLATIONS AND SUBSEQUENT SERVICE AND REPAIRS FOR ANY CERTIFIED COMPONENT FOR WHICH THIS PERMIT WAS ISSUED, SHALL ONLY BE PERFORMED BY A CURRENT AND CERTIFIED PERSON WHO HAS SUCCESSFULLY COMPLETED THE MANUFACTURER'S TRAINING COURSE AND APPROPRIATE INTERNATIONAL CODE COUNCIL (ICC) CERTIFICATION. COMPLETION OF ANY AQMD TRAINING COURSE DOES NOT CONSTITUTE AS A SUBSTITUTE FOR THIS REQUIREMENT. PROOF OF SUCCESSFUL COMPLETION OF ANY MANUFACTURER TRAINING COURSE SHALL BE WITH THE MANUFACTURER.
9. AT LEAST SEVENTY-TWO (72) HOURS PRIOR TO BACK-FILLING ANY UNDERGROUND STORAGE TANK OR PIPING, THE SCAQMD SHALL BE NOTIFIED BY E-MAIL AT [R461BACKFILL@AQMD.GOV](mailto:R461BACKFILL@AQMD.GOV). SUCH NOTIFICATION SHALL INCLUDE THE NAME OF THE OWNER OR OPERATOR; THE NAME OF THE CONTRACTORS; THE LOCATION OF THE FACILITY; AND THE SCHEDULED START AND COMPLETION DATES OF THE BACK-FILLING PROCEDURE. THE BACK-FILLING PROCEDURE SHALL NOT COMMENCE UNTIL INSPECTED BY A DISTRICT REPRESENTATIVE.
10. A STATIC PRESSURE LEAK DECAY TEST SHALL BE CONDUCTED TO DEMONSTRATE THAT THE STORAGE TANKS, THE REMOTE AND/OR NOZZLE VAPOR RECOVERY CHECK VALVES, ASSOCIATED VAPOR RETURN PIPING AND FITTINGS ARE FREE FROM VAPOR LEAKS. THE TEST SHALL BE CONDUCTED IN ACCORDANCE WITH CARB TEST PROCEDURE METHOD TP-201.3 AS A PERFORMANCET TEST AND AS A REVERIFICATION TEST. RESULTS SHALL BE SUBMITTED TO THE AQMD, OFFICE OF ENGINEERING AND COMPLIANCE, WITHIN SEVENTY-TWO (72) HOURS OF TEST.
11. THE PHASE II VAPOR RECOVERY SYSTEM SHALL BE INSTALLED, OPERATED, AND MAINTAINED SUCH THAT THE MAXIMUM ALLOWABLE PRESSURE THROUGH THE SYSTEM INCLUDING NOZZLE, VAPOR HOSE, SWIVELS, AND UNDERGROUND PIPING DOES NOT EXCEED THE DYNAMIC BACK PRESSURES DESCRIBED BY THE CALIFORNIA AIR RESOURCES BOARD EXECUTIVE ORDER BY WHICH THE SYSTEM WAS CERTIFIED:

SAMPLE

# PERMIT TO CONSTRUCT/OPERATE

A/N 526491

## CONTINUATION OF PERMIT TO CONSTRUCT/OPERATE

NITROGEN FLOWRATES  
(CFH)  
60  
80

DYNAMIC BACK PRESSURE  
(INCHES OF WATER)  
0.35  
0.62

DYNAMIC BACK PRESSURE TESTS SHALL BE CONDUCTED TO DETERMINE THE PHASE II SYSTEM VAPOR RECOVERY BACK PRESSURES. THE TESTS SHALL BE CONDUCTED IN ACCORDANCE WITH CARB TEST PROCEDURE TP-201.4, METHODOLOGY 1; AS A PERFORMANCE TEST AND AS A REVERIFICATION TEST. RESULTS SHALL BE SUBMITTED TO THE AQMD, OFFICE OF ENGINEERING AND COMPLIANCE, WITHIN SEVENTY-TWO (72) HOURS OF TESTS.

12. IF THE CARB EXECUTIVE ORDER REQUIRES THE INSTALLATION OF A LIQUID REMOVAL DEVICE, A LIQUID REMOVAL RATE TEST SHALL BE CONDUCTED TO DEMONSTRATE THE REMOVAL OF GASOLINE FROM THE VAPOR PASSAGE OF THE COAXIAL HOSE. THE TEST SHALL BE CONDUCTED IN ACCORDANCE WITH CARB TEST PROCEDURE METHOD TP-201.6C AS A PERFORMANCE TEST AND AS A REVERIFICATION TEST. RESULTS SHALL BE SUBMITTED TO THE AQMD, OFFICE OF ENGINEERING AND COMPLIANCE, WITHIN SEVENTY-TWO (72) HOURS OF TEST.
13. THE AQMD SHALL BE NOTIFIED BY E-MAIL AT [R461TESTING@AQMD.GOV](mailto:R461TESTING@AQMD.GOV) OR BY FACSIMILE AT TELEPHONE NUMBER (909) 396-3606 AT LEAST SEVENTY-TWO (72) HOURS PRIOR TO TESTING. SUCH NOTIFICATION SHALL INCLUDE THE NAME OF THE OWNER OR OPERATOR; THE NAME OF THE CONTRACTOR; THE LOCATION OF THE FACILITY; AND THE SCHEDULED START AND COMPLETION DATES OF THE TESTS TO BE PERFORMED.
14. THE TESTING FOR THE ABOVE MENTIONED TESTS SHALL BE CONDUCTED IN ACCORDANCE WITH THE MOST RECENT RULE 461 AMENDMENT OR CARB EXECUTIVE ORDER REQUIREMENTS, WHICHEVER IS MORE STRINGENT.
15. ALL RECORDS AND TEST RESULTS THAT ARE REQUIRED TO BE MAINTAINED BY RULE 461 SHALL BE KEPT ON SITE AND MADE AVAILABLE TO DISTRICT REPRESENTATIVES UPON REQUEST.
16. BY APRIL 1, 2013, THE OWNER/OPERATOR OF THIS EQUIPMENT SHALL BE IN FULL COMPLIANCE FOR STANDING LOSS CONTROL FOR THE VAPOR RECOVERY SYSTEM AS PER THE LATEST VERSION OF ARB EXECUTIVE ORDER VR-301.
17. BY JULY 1, 2014, THE OWNER/OPERATOR OF THIS EQUIPMENT SHALL SUBMIT AN APPLICATION AND RECEIVE A PERMIT TO CONSTRUCT/OPERATE TO INSTALL AND BE IN FULL COMPLIANCE FOR ALL PHASE I ENHANCED VAPOR RECOVERY REQUIREMENTS.

### NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR COPY SHALL BE POSTED ON OR WITHIN 8 METERS OF THE EQUIPMENT.

**SAMPLE**

**PERMIT TO CONSTRUCT/OPERATE**

**A/N 526491**

**CONTINUATION OF PERMIT TO CONSTRUCT/OPERATE**

**THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT CANNOT BE CONSIDERED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF OTHER GOVERNMENT AGENCIES.**

**EXECUTIVE OFFICER**

**By Dorris M. Bailey/jm04  
07/01/2011**

**SAMPLE**

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT****APPLICATION PROCESSING AND CALCULATIONS**

PAGES 7

PAGE 1

APPL NO  
526491DATE  
11/2/2011ENGINEER  
JMO4

CHECK BY

**EVALUATION FOR PERMIT TO CONSTRUCT/OPERATE****APPLICANT'S NAME:** CALIFORNIA STEEL INDUSTRIES INC**MAILING ADDRESS:** P.O. BOX 5080  
FONTANA, CA 92335 - 5259**EQUIPMENT ADDRESS:** 14000 SAN BERNARDINO AVE, FONTANA, CA 92335 - 5259**EQUIPMENT DESCRIPTION:**

Fuel Storage and Dispensing Facility Consisting of:

- 1) 1 - GASOLINE ABOVEGROUND STORAGE TANK, LUBE CUBE ABOVEGROUND TANK (G-70-148-A), RECTANGULAR, 30' - 8" L. X 7' - 11" W. X 7' - 11" H., 10,000 GALLON CAPACITY, EQUIPPED WITH A PRESSURE/VACUUM RELIEF VALVE, AND A SUBMERGED FILL TUBE.
- 2) 2 - GASOLINE NOZZLES DISPENSING 2 PRODUCTS, EQUIPPED WITH PHASE II VAPOR RECOVERY SYSTEM, BALANCE RETRACTOR (G-70-52-AM).

**BACKGROUND HISTORY:**

This application was submitted for an alteration on 8/16/2011. The planned installation date will be as soon as the permit is granted. The alteration involves the removal of the existing Hasstech Phase II vapor recovery system and replacing it with a balance Phase II EVR system. Since this is a major modification of the Phase II vapor recovery system and not of the Phase I vapor recovery system, the applicant will not be required to meet the standing loss and Phase I EVR requirements at this time. The applicant will have a permit condition informing them of these upcoming retrofit requirements. Currently, there are no CARB certified Phase II EVR systems for aboveground tanks, and therefore the applicant will be allowed to install CARB certified Phase II EVR components instead. The facility's proposed normal operating schedule is as follows: 24 hours/day, 7 days/week, 30 days/month and 52 weeks/year. This is a commercial gasoline storage and dispensing facility. The facility has received 18 Notices to Comply and 15 Notices of Violation from the District. This application was not submitted as a result of these notices. The applicant has since remedied these notices. An application, A/N 347553 was previously filed with the District for this equipment.

**PROCESS DESCRIPTION:**

The gasoline storage and dispensing facility is used to store and dispense one grade of gasoline. This facility is equipped with CARB certified Phase I and Phase II vapor controls, which complies with Rule 461. Furthermore, these vapor controls are considered to be T-BACT, which complies with Rule 1401. Finally, the project will not result in a net emission increase and thus will comply with Reg. XIII.

**EMISSION CALCULATIONS:**

The hydrocarbon and benzene emissions from storage tank filling and motor vehicle refueling operations are estimated by using appropriate emission factors summarized in the following table. These emission factors were developed by the District's Planning Division.

**I. Emission Factors and Control Efficiencies**

The following table summarizes the uncontrolled ROG emission factors in pounds per 1,000 gallons of gasoline throughput, benzene, ethylbenzene and naphthalene content of gasoline, and control efficiencies:

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

**APPLICATION PROCESSING AND CALCULATIONS**

PAGES 7	PAGE 2
APPL NO 526491	DATE 11/2/2011
ENGINEER JMO4	CHECK BY

*Emission Factors and Control Efficiencies for Underground Tanks*

	Loading (a)	Breathing	Refueling (b)	Spillage
<b>ROG</b>				
Uncontrolled ROG Emission Factors (lbs/1000 gal)	8.40	0.10	8.30	0.24 (c)
Control Efficiency	95.000%	75.000%	96.145%	0%
controlled ROG Emission Factors (lbs/1000 gal)	0.420	0.025	0.320	0.240
<b>Toxic Air Contaminants (TACs) wt% (d)</b>				
Benzene	0.300%	0.300%	0.300%	1.000%
Ethyl benzene	0.118%	0.118%	0.118%	1.640%
Naphthalene	0%	0%	0%	0.140%

- (a) Revised from 90% assumed by CAPCOA to 95% based on SCAQMD's finding
- (b) Revised from 99% assumed by CAPCOA to 96% based on SCAQMD's finding.
- (c) Spillage emission factor was revised from 0.42 to 0.24 based on EVR Regulation.
- (d) Specification profiles for TACs are from <http://www.arb.ca.gov/ei/speciate/speciate.htm>

**II. MICR Calculations**

The following equations are used for calculating ROG emissions and MICR from gasoline dispensing operations.

Net Increased Throughput = Proposed throughput - Total permitted throughput prior to the modification or average throughput for the last two years

ROG, uncontrolled = EF (lbs-ROG/1,000 gals gas) x Proposed gas throughput (1,000 gals/month)  
 ROG, controlled = ROG, uncontrolled x Control Efficiency

Benzene, uncontrolled = ROG, uncontrolled x Benzene Content in gasoline  
 Benzene, controlled = ROG, controlled x Benzene Content in gasoline

Ethyl benzene, uncontrolled = ROG, uncontrolled x Ethyl benzene Content in gasoline  
 Ethyl benzene, controlled = ROG, controlled x Ethyl benzene Content in gasoline

Naphthalene, uncontrolled = ROG, uncontrolled x Naphthalene Content in gasoline  
 Naphthalene, controlled = ROG, controlled x Naphthalene Content in gasoline

*Total Emission Increase - Underground Tanks*

Proposed GA Throughput (Gals/Month)	8000
Average GA Throughput (Gals/Month)	8000
Net GA Throughput (Gals/Month)	0

The Total Emissions are as follows:

Emission (lbs/month)		Process Type				Total ROG
		Loading	Breathing	Refueling	Spillage	
ROG	R1	67.200	0.800	66.400	1.920	136.320
	R2	3.360	0.200	2.560	1.920	8.040

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

**APPLICATION PROCESSING AND CALCULATIONS**

PAGES 7	PAGE 3
APPL NO 526491	DATE 11/2/2011
ENGINEER JM04	CHECK BY

Benzene	R1	0.202	0.000	0.199	0.019	0.420
	R2	0.010	0.000	0.008	0.019	0.037
Ethyl benzene	R1	0.079	0.000	0.078	0.031	0.188
	R2	0.000	0.000	0.000	0.031	0.031
Naphthalene	R1	0.000	0.000	0.000	0.000	0.000
	R2	0.000	0.000	0.000	0.000	0.000

**III. Summary of Emissions**

	Total ROG		Total Benzene Ethyl Benzene & Naphthalene	
	R1	R2	R1	R2
Monthly (lb/mo)	136.32	8.04	0.610	0.080
30-day average (lb/day)	4.54	0.27	0.020	0.000
Hourly (lb/hr)	0.19	0.01	0.000	0.000

**CANCER RISK ASSESSMENT:**

From gasoline storage and dispensing operations, benzene is the only toxic emittant that has significant effect to the maximum individual cancer risk (MICR). Using the CAPCOA provided risk values, the staff in the District's Planning Division prepared reference MICR's for different scenarios, i.e., for underground and aboveground tanks, and for residence and workers. These MICR's are tabulated for different downwind distances from a permit unit that is located in West LA with annual gasoline throughput of one million gallons.

Once a reference MICR is determined for a given downwind distance, it has to be adjusted by using the MET factor to reflect the meteorological conditions of a permit unit's location and the actual fuel throughput of a permit unit.

The following is the parameters used for calculating the MICR for this application. The distances are from the center of emission source to the nearest receptor areas:

Tank Type	= Underground
GA Throughput (MMGals-GA/Year)	= 0
Facility Zone	= 34
MET Factor	= 1.06
Downwind Distance to Residence (Meters)	= 304
Downwind Distance to Workers (Meters)	= 304

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

PAGES 7	PAGE 4
APPL NO 526491	DATE 11/2/2011
ENGINEER JM04	CHECK BY

**APPLICATION PROCESSING AND CALCULATIONS**

A reference MICR is determined for a given downwind distance in the following manner:

1. If the downwind distance is less than or equal to minimum pre-defined distance, use the MICR at the minimum distance.
2. If the downwind distance is greater than or equal to maximum pre-defined distance, use the MICR at the maximum distance.
3. Find MICRs two distances, i.e., one for nearest higher distance and the other one for nearest lower distance, and interpolate them.

$$\text{MICR, ref} = \text{MICR, low} + [(\text{MICR, high} - \text{MICR, low}) / (\text{High Distance} - \text{Low Distance})] \\ * (\text{Downwind Distance} - \text{Low Distance})$$

where,

MICR, ref	Reference MICR at a given downwind distance
MICR, low	MICR at a lower interpolate distance
MICR, high	MICR at a higher interpolate distance
Low Distance	Lower interpolate distance
High Distance	Higher interpolate distance
Downwind Dist	Given downwind distance

**MICR - Underground Tanks****MICR for Residences**

$$\text{Reference MICR [in-a-million / (1 MMGal-GA/Year)]} \\ = 0.043$$

**Adjusted MICR (in-a-million)**

$$= (\text{Reference MICR}) \times (\text{MET factor}) \times (\text{Annual Fuel Throughput}) \\ = 0.043 \times 1.06 \times 0 = 0$$

**MICR for Workers**

$$\text{Reference MICR [in-a-million / (1 MMGal-GA/Year)]} \\ = 0.009$$

**Adjusted MICR (in-a-million)**

$$= (\text{Reference MICR}) \times (\text{MET factor}) \times (\text{Annual Fuel Throughput}) \\ = 0.009 \times 1.06 \times 0 = 0$$

**Modeling Assumptions:**

The modeling assumes the generic station operates 24 hours/day, with 80% of the emissions occurring between 6:00 AM and 8:00 PM, and the remaining 20% of the emissions occurring between 8:00 PM and 6:00 AM. In addition, the refueling and spillage emissions were modeled as volume sources and the loading and breathing emissions as point sources.

**Risk Calculations:**

The revised risk calculation for 1,000,000 gallons a year throughput for the different distances (20, 25, 30.....1000 meters) are based on the inhalation cancer potency factor of 0.1/(mg/kg-day) for benzene, 0.0087/(mg/kg-day) for ethyl benzene, and 0.12/(mg/kg-day) for naphthalene.

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

**APPLICATION PROCESSING AND CALCULATIONS**

PAGES 7	PAGE 5
APPL NO 526491	DATE 11/2/2011
ENGINEER JM04	CHECK BY

**RULES EVALUATION:**

- Rule 212**                There is no school located within 1,000-feet from this facility. The maximum individual cancer risk is less than ten-in-one million. Public notice is exempt.
- Rule 461**                The gasoline tank was equipped with CARB certified Phase I vapor controls and was installed per CARB executive order G-70-148. The tank was also equipped with a submerged fill tube and a pressure vacuum relief valve. All nozzles serving the gasoline tank will be equipped with CARB certified Phase II vapor controls and will be installed per CARB executive order G-70-52-AM. Therefore, this facility complies with Rule 461.
- Rule 1170**                This is a non-fleet fuel dispensing facility, and its total fueling dispensing rate is less than 20,000 gallons per month. Therefore, it is exempted from the provisions of this rule.
- Rule 1401**                The alteration will not result in a net toxic emission increase and therefore is exempt from further rule evaluation per section (g)(1)(B). The facility complies with this rule.
- Rule 1401.1**                The rule DOES NOT apply as facility is an existing facility.
- Rule REGXIII**                No net emission increase. BACT and Offset are not required. No modeling required for VOCs. Complies with Rule. This facility also complies with Rule 1313 since the operator will install both Phase I and Phase II vapor recovery equipment, which meets current BACT requirements. There will be no monthly gasoline throughput condition since this facility has been in continuous operation prior to the adoption of this rule.

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**

**APPLICATION PROCESSING AND CALCULATIONS**

PAGES 7	PAGE 6
APPL NO 526491	DATE 11/2/2011
ENGINEER JMO4	CHECK BY

**Reference MICR Chart - Under Ground Tanks**

**MICR for Residential Areas - Under Ground Tanks per One Million Gallons for Gasoline**

Dist(m)	20	25	30	40	50	60	70	75	80	90
MICR	5.600	4.000	3.004	1.866	1.278	0.940	0.722	0.636	0.572	0.462

Dist(m)	100	125	150	175	200	250	300	350	400	450
MICR	0.381	0.248	0.174	0.125	0.095	0.060	0.044	0.034	0.027	0.022

Dist(m)	500	600	700	800	900	1000				
MICR	0.018	0.014	0.011	0.009	0.007	0.006				

**MICR for Commercial Areas - Under Ground Tanks per One Million Gallons for Gasoline**

Dist(m)	20	25	30	40	50	60	70	75	80	90
MICR	1.094	0.781	0.587	0.364	0.250	0.184	0.141	0.124	0.112	0.090

Dist(m)	100	125	150	175	200	250	300	350	400	450
MICR	0.074	0.049	0.034	0.024	0.018	0.012	0.009	0.007	0.005	0.004

Dist(m)	500	600	700	800	900	1000				
MICR	0.004	0.003	0.002	0.002	0.001	0.001				

**MET Factors for Facility Zones (Underground Tanks)**

Zone	01	02	03	04	05	06	07	08	09	10	11	12
MET	0.86	1.00	0.90	1.04	0.80	0.95	0.89	1.04	1.04	1.14	0.80	1.18

Zone	13	15	16	17	18	19	20	21	22	23	24	25
MET	0.70	0.70	0.96	0.91	1.08	0.71	1.08	0.71	0.91	0.91	0.81	0.79

Zone	26	27	28	29	30	31	32	33	34	35	36	37
MET	0.79	0.79	0.81	0.83	1.00	1.00	1.05	1.05	1.06	1.35	1.05	1.01

Zone	38	39										
MET	1.35	0.00										

**CONCLUSION & RECOMMENDATIONS:**

This application is expected to comply with all applicable District Rules and Regulations. A Permit to Construct/Operate is recommended subject to the conditions as outlined in the sample permit.