

Title V Permit Evaluation

Site Number: A4020

Site Name: SFPP, L.P.

Site Address: 2150 Kruse Drive, San Jose, CA 95131

Periodic Monitoring:

Summary Table(s)

VOC Sources

S# & Description	Federally Enforceable Limit Citation	Federally Enforceable Limit	Potential to Emit: tpy	Monitoring
S1, S28, S29, S30, S31, S32 (Loading Racks 1, 2, 3, 4, 5, 6)	BAAQMD 8-33-301	9.6 g/1000 liters (0.08 lb/1000 gallons)	N/A	Source test and Record keeping (existing)
	BAAQMD 8-33-308	3000 ppm as methane and 6.8 Kg (15 pounds) per day	N/A	Continuous Infrared HC Analyzer (existing)
	BAAQMD 8-33-309	46 cm (18 in.) of water column	N/A	Pressure gauge (existing)
	40 CFR 60.502(b)	35 g/1000 liters	N/A	Source test (existing)
	40 CFR 60.502(e)	Vapor-tightness (gasoline tank trucks)	N/A	Documents during loading
	BAAQMD condition #7492, part 7	200 ppm as propane	N/A	Continuous Infrared HC Analyzer (existing)
	BAAQMD condition #7492, part 2	200,000 gallons/hr (total material)	N/A	Hourly record keeping (existing)
	BAAQMD condition #7492, part 3	4,000,000 gallons/day (total material)	N/A	Daily record keeping (existing)
	BAAQMD condition #7492, part 12	59,400,000 gallons/yr (ethanol)	N/A	Monthly record keeping (existing)
	BAAQMD condition #7492, part 14 and 15	600 degree Fahrenheit	N/A	Continuous monitoring and record keeping (existing)
	BAAQMD condition #7492, part 19	Operating mode	N/A	Record keeping of switching of operating mode

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S2, S5, S19, S23, S26 (Internal floating roof storage tanks)	BAAQMD 8-5-321	Primary seal inspection	N/A	Measurement every 10 years (existing)
S2, S5, S19, S23, S26 (Internal floating roof storage tanks)	BAAQMD 8-5-322	Secondary seal inspection	N/A	Measurement every 10 years (existing)
S3, S6 thru S10, S13, S14, S16 thru S18, S20 thru S22, S25, S27, S34, S35 (Internal floating roof storage tanks)	BAAQMD 8-5-321	Primary seal inspection	N/A	Measurement every 10 years (existing)
S12 (Internal floating roof storage tank)	BAAQMD 8-5-321	Primary seal inspection	N/A	Measurement every 10 years (existing)
	BAAQMD condition #5406, part 1	5,040,000 gallons/yr (ethanol)	N/A	Monthly record keeping (existing)
S33, S40 (Internal floating roof storage tanks)	40 CFR 60.112b(a)(1)	Floating Roof	N/A	Initial report (existing)
	40 CFR 60.113b(a)(1)	Floating Roof	N/A	Visual Inspection/Record keeping (existing)
	BAAQMD 8-5-321; 40 CFR 60.113b(a)(1)	Primary seal inspection	N/A	Measurement every 10 years, Visual Inspection/Record keeping (existing)
	BAAQMD 8-5-322; 40 CFR 60.113b(a)(1)	Secondary seal inspection	N/A	Measurement every 10 years, Visual Inspection/Record keeping (existing)

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	40 CFR 60 Subpart Kb, 60.116b(c)	>0.5 psia (liquid stored); true vapor pressure	N/A	Daily record keeping (existing)
	40 CFR 60 Subpart Kb, 60.116b(d)	>0.74 psia (liquid stored)	N/A	Daily notify (existing)
S36 (Internal floating roof storage tank)	BAAQMD 8-5-321	Primary seal inspection	N/A	Measurement every 10 years (existing)
	40 CFR 60 Subpart Ka, 60.115(a)	Liquid stored	N/A	Daily record keeping (existing)
	40 CFR 60 Subpart Ka, 60.115(b)	True vapor pressure	N/A	Daily record keeping (existing)
	40 CFR 60 Subpart Ka, 60.115(c)	>0.1 psia, true vapor pressure	N/A	Daily record keeping (existing)
S43 (Oil/water separator)	BAAQMD 8-8-301.1	Roof seals and other opening gaps <0.125 inch	N/A	Visual Inspection (existing)
S44 (Internal floating roof storage tanks)	BAAQMD 8-5-321	Primary seal inspection	N/A	Measurement every 10 years (existing)
	BAAQMD 8-5-322	Secondary seal inspection	N/A	Measurement every 10 years (existing)
	40 CFR 60 Subpart Ka, 60.115(a)	Liquid stored	N/A	Daily record keeping (existing)
	40 CFR 60 Subpart Ka, 60.115(b)	True vapor pressure	N/A	Daily record keeping (existing)
	40 CFR 60 Subpart Ka, 60.115(c)	>0.1 psia, true vapor pressure	N/A	Daily record keeping (existing)
S45 (underground sump tank)	BAAQMD condition #16514, part 1	214,520 gallons/yr (gasoline)	N/A	Monthly record keeping (existing)
	BAAQMD condition #16514, part 1	92,072 gallons/yr (Jet kerosene)	N/A	Monthly record keeping (existing)
Components	BAAQMD 8-18-301	General equipment leak ≤100 ppm	N/A	Quarterly Inspection
	BAAQMD 8-18-302	Valve leak ≤ 100 ppm	N/A	Quarterly Inspection
	BAAQMD 8-18-303	Pump and Compressor leak ≤ 500 ppm	N/A	Quarterly Inspection

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	BAAQMD 8-18-304	Connection leak \leq 100 ppm	N/A	Quarterly Inspection
	BAAQMD 8-18-305	Pressure relief valve leak \leq 500 ppm	N/A	Quarterly Inspection
Components	BAAQMD 8-18-306.2	Awaiting repair : Valves \leq 0.5%, Pressure relief \leq 1%, Pump and connector \leq 1%	N/A	Inspection within 24 hours
	BAAQMD 8-18-306.3.2	Mass emissions & non repairable equipment allowed	N/A	Daily inspection
	SIP BAAQMD 8-18-302	Valve leak \leq 100 ppm	N/A	Quarterly inspection
	SIP BAAQMD 8-18-303	Connector leak \leq 100 ppm	N/A	Quarterly inspection
	SIP BAAQMD 8-18-304.1	Valve prepared within 5 years or next scheduled turnaround	N/A	Quarterly inspection
	SIP BAAQMD 8-18-304.2	Awaiting repaired valves <0.5%	N/A	Inspection every 24 hours
	SIP BAAQMD 8-18-305	New or replaced valve leak \leq 100 ppm for 4 consecutive quarters	N/A	Quarterly inspection
	SIP BAAQMD 8-18-306	Repeat valve, connector leak	N/A	Quarterly inspection
	SIP BAAQMD 8-25-302	Pump leak \leq 500 ppm	N/A	Measure leak quarterly/ Daily inspection
	SIP BAAQMD 8-25-303	Compressor leak \leq 500 ppm	N/A	Measure leak quarterly/ Daily inspection
	SIP BAAQMD 8-25-304.1	Pump/Compressor repaired	N/A	Measure leak within 7 days of repair/Inspection plan
	SIP 8-25-304.2	Valves awaiting repair	N/A	Measure leak within 7 days of repair/Inspection plan
	SIP BAAQMD 8-25-305	New or replaced pump and compressor leak \leq 500 ppm	N/A	Measure leak quarterly/Daily inspection

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	SIP BAAQMD 8-25-306	Repeat leakers	N/A	Measure leak quarterly/Daily inspection

Permit Shield:

The applicant did not request any permit shield

Alternate Operating Scenario:

The permit contains an alternate operating scenario.

The most frequently mode of operation is the By-Pass Mode. In this mode of operation the vapors are collected from the loading of tanker trucks in a vapor holder tank, and then routed to the vapor processing unit, A-2. There is no loading limit while operating in this mode.

The alternative mode of operation is the Direct Mode. In this mode of operation the vapors from the loading of tanker trucks are routed directly to the vapor processing unit, A-2. There are CARB certified hourly and daily loading limits while operating in this mode. This mode of operation has the District's concurrence.

Compliance Status:

The permit application indicated that all internal floating roof tanks were not in compliance with the requirements of the BAAQMD Regulation 8-5-321.3. The District Regulation 8-5 has undergone revision. The rule required metallic shoe type seals to have a minimal distance of 24" between the liquid level and the top of the shoe for both external and internal floating roof tanks. The revised version of the rule requires that the internal floating roof tanks shall have a minimum distance of 18" rather than 24". The revised regulation was adopted in December 1999, and these tanks are now in compliance with this particular requirement. However, the requirements of the revised regulation will not be federally enforceable till the regulation is included in the SIP.

Approval of BAAQMD Regulation 8-5-321.3 was proposed in the Federal Register on August 2, 2001. EPA received no comments on the proposal. It is anticipated that the final rule will be promulgated shortly. The permit has been written with the assumption that the rule will be finalized before the permit is issued. Therefore, the obsolete SIP section has not been included.

Alignment of Information in Application and Proposed Permit:

There are no significant discrepancies between the application and the permit.