

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE APPLICATION PROCESSING AND CALCULATIONS	PAGES 14	PAGE 1
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	PROCESSED By Thomas Lee	CHECKED By

PERMIT TO OPERATE

COMPANY NAME AND ADDRESS

Edgington Oil Company
2400 E. Artesia Blvd.
Long Beach, 90805

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EQUIPMENT LOCATION

Edgington Oil Company
2400 E. Artesia Blvd.
Long Beach, 90805

Facility ID: 800264

EQUIPMENT DESCRIPTION

Additions are noted in underlines. Deletions are noted in ~~strikeouts~~.

Section D of Facility Permit, ID# 800264

(The following changes have been made in P3/S3, Sec. D of the Facility Title V permit).

Description	ID No.	Connected To	RECLAIM Source Type/Monitoring Unit	Emissions And Requirements	Conditions
Process 3: TREATING/STRIPPING					
System 3: WASTE WATER TREATMENT SYSTEM					S13.3
SUMP JUNCTION BOX, UNDERGROUND, WASTE WATER, FIXED COVER, (EAST TANK FARM AREA AT RACK NO. 7) A/N: 287851 <u>471225</u>	D54			VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	<u>E90.x</u>
SUMP JUNCTION BOX, UNDERGROUND, WASTE WATER, FIXED COVER, (EAST TANK FARM AREA AT RACK NO. 6) A/N: 287851 <u>471225</u>	D55			VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]	<u>E90.x</u>

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<u>SUMP JUNCTION BOX, JB1201,</u> UNDERGROUND, WASTE WATER, FIXED COVER, (LOCATED AT WEST END OF EAST TANK FARM), <u>WITH TWO</u> <u>CARBON DRUMS</u> A/N: 287851 471225	D56			<u>VOC: 500 PPMV</u> <u>(5) [RULE 1176, 9-</u> <u>13-1996]</u>	<u>E90.y,</u> <u>E128.x,</u> <u>E153.x</u>
<u>SUMP JUNCTION BOX, JB1701,</u> UNDERGROUND, WASTE WATER, FIXED COVER, (LOCATED IN PIPELINE SHIPPING AREA), <u>WITH A</u> <u>CARBON DRUM</u> A/N: 287851 471225	D57			<u>VOC: 500 PPMV</u> <u>(5) [RULE 1176, 9-</u> <u>13-1996]</u>	<u>E90.y,</u> <u>E128.x,</u> <u>E153.x</u>
<u>SUMP JUNCTION BOX, JB1101,</u> UNDERGROUND, WASTE WATER, FIXED COVER, (LOCATED AT NORTHEAST CORNER OF MIDDLE TANK FARM AREA), <u>WITH A CARBON</u> <u>DRUM</u> A/N: 287851 471225	D58			<u>VOC: 500 PPMV</u> <u>(5) [RULE 1176, 9-</u> <u>13-1996]</u>	<u>E90.y,</u> <u>E128.x,</u> <u>E153.x</u>
<u>SUMP JUNCTION BOX,</u> UNDERGROUND, WASTE WATER, FIXED COVER, (LOCATED AT THE EMULSION PLANT) A/N: 287851 471225	D59			<u>VOC: 500 PPMV</u> <u>(5) [RULE 1176, 9-</u> <u>13-1996]</u>	<u>E90.x</u>
<u>SUMP JUNCTION BOX,</u> UNDERGROUND, WASTE WATER, FIXED COVER, (LOCATED AT THE EMULSION PLANT) A/N: 287851 471225	D60			<u>VOC: 500 PPMV</u> <u>(5) [RULE 1176, 9-</u> <u>13-1996]</u>	<u>E90.x</u>
<u>SUMP JUNCTION BOX, JB101,</u> UNDERGROUND, WASTE WATER, FIXED COVER, (LOCATED AT SOUTH END OF CRUDE UNIT #2) A/N: 287851 471225	D61			<u>VOC: 500 PPMV</u> <u>(5) [RULE 1176, 9-</u> <u>13-1996]</u>	<u>E90.x</u>
<u>SUMP JUNCTION BOX, JB1,</u> UNDERGROUND, WASTE WATER, FIXED COVER, (LOCATED AT CRUDE UNIT #1) A/N: 287851 471225	D62			<u>VOC: 500 PPMV</u> <u>(5) [RULE 1176, 9-</u> <u>13-1996]</u>	<u>E90.x</u>

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<u>SUMP JUNCTION BOX, UNDERGROUND, WASTE WATER, FIXED COVER, (LOCATED IN WEST TANK FARM AREA)</u> A/N: <u>287851 471225</u>	D63			<u>VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]</u>	<u>E90.x</u>
<u>TANK, SURGE, INTERNAL FLOATING ROOF, T-1401, BLADDER TYPE, OILY WATER, 1100 BBL; DIAMETER: 16 FT; HEIGHT: 32 FT</u> A/N: <u>287851 471225</u> <u>FLOATING ROOF, WELDED SHELL</u> <u>PRIMARY SEAL, MECHANICAL SHOE, CATEGORY A</u>	D64			<u>VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]</u>	<u>C1.xx, K67.x</u>
<u>AIR FLOATATION UNIT, FOUR CELLS, FIXED COVER</u> A/N: <u>287851 471225</u>	D67			<u>VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]</u>	
<u>DRAIN SYSTEM COMPONENT</u> A/N: <u>287851 471225</u>	D350			<u>VOC: 500 PPMV (5) [RULE 1176, 9-13-1996]</u>	
<u>FUGITIVE EMISSIONS, MISCELLANEOUS</u> A/N: <u>287851 471225</u>	D313				<u>H13.13</u>

CONDITIONS

C1.xx The operator shall limit the throughput to no more than 38,500 barrel(s) in any one calendar month.

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

[Devices subject to this condition: D64]

E90.x The operator shall periodically monitor the VOC concentration at the outlet of this device according to the following specifications:

The operator shall monitor once every month using EPA Method 21.

The operator shall calibrate the instrument used to monitor the parameter in ppmv methane.

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Alternately, the operator may use the District Grab Sample Method, as specified in Rule 1176, to measure the VOC concentration.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1176, 9-13-1996; RULE 3004(a)(4) – Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: D54, D55, D59, D60, D61, D62, D63]

E90.y The operator shall periodically monitor the VOC concentration at the outlet of the final carbon canister according to the following specifications:

The operator shall monitor once every quarter using EPA Method 21.

The operator shall calibrate the instrument used to monitor the parameter in ppmv methane.

Alternately, the operator may use the District Grab Sample Method, as specified in Rule 1176, to measure the VOC concentration.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1176, 9-13-1996; RULE 3004(a)(4) – Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: D56, D57, D58]

E128.x The operator shall keep all spent carbon in a tightly covered container which shall remain closed except when it is being transferred into or out of the container.

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

[Devices subject to this condition: D56, D57, D58]

E153.x The operator shall change over the carbon in the adsorber whenever breakthrough occurs.

For the purpose of this condition, breakthrough occurs when the EPA Method 21 measurement or the District Grab Sample Method analytical result indicates a VOC concentration of 500 ppmv at the outlet of the carbon canister.

[RULE 1176, 9-13-1996; RULE 3004(a)(4) – Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: D56, D57, D58]

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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	1176

[RULE 1176, 9-13-1996]

[Systems subject to this condition : Process 3, System 3]

H23.13 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40CFR60, SUBPART	GGG
VOC	District Rule	1173

[RULE 1173, 5-13-1994; RULE 1173, 2-6-2009; 40CFR 63 Subpart GGG, 4-20-2006]

[Devices subject to this condition : D202, D295, D302, D303, D304, D305, D306, D307, D308, D309, D310, D312, D313, D314, D315, D316, D317, D318, D319, D320, D321, D322, D326, D327, D329, D330, D331, D332, D364, D365, D383]

K67.x The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Tank throughput.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 1301, 12-7-1995]

[Devices subject to this condition: D64]

BACKGROUND

Edgington Oil Company (EOC) submitted A/N 471225 on June 27, 2007 to request the following changes in Table 1 be made in the Equipment description column of the Waste Water Treatment System (P3/S3) permit “to more accurately portray the current state of the equipment for this system”:

Table 1

Equipment ID(s)	Requested Changes
D54, D55, D59, D60, D61, D62, D63	Change equipment category from ‘SUMP’ to ‘JUNCTION BOX’ to more accurately describe the devices.
D56	Change equipment description from ‘SUMP’ to ‘JUNCTION BOX, JB1201’ and identify it as connected to two carbon drums.

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Equipment ID(s)	Requested Changes
D57	Change equipment description from 'SUMP' to 'JUNCTION BOX, JB1701' and identify it as connected to a carbon drum.
D58	Change equipment description from 'SUMP' to 'JUNCTION BOX, JB1101' and identify it as connected to a carbon drum.
D64	Change the permit to reflect that the fixed roof/bladder seal system has been upgraded to an internal floating roof with mechanical shoe seal, Category A.

Pursuant to Rule 1176(c), the following definitions apply;

JUNCTION BOX is a structure with a manhole or access point to a wastewater sewer system lines.

SUMP is a surface impoundment or excavated depression in the ground, which is part of the wastewater system and used for storage of wastewater or separation of petroleum liquids, VOC containing liquids, water, and/or solids.

WASTEWATER SYSTEM is any system which consists of one or more process drains, sewer lines, junction boxes, manholes, sumps, or waste water separators, including all of their associated components, used to receive, convey, separate, treat, or process wastewater.

APPLICATION SUMMARY

Table 2 below lists the application and fee submitted by EOC:

Table 2

A/N	Equipment	BCAT	Status	Type	Fee Schedule	Fee ¹ Required	Fee Paid	Amt Due	Previous A/N
471225	D54-D64, D67, D313, D350	294962	21	50	E	\$6,382.98	\$2,681.75	\$3,701.23	287851

¹Based on the application submittal date of 6/27/07, permit processing fee (for FY 06-07) plus 50% penalty for PO no PC is: \$6,382.98 (\$4,255.32 + \$2,127.66). A balance of \$3,701.23 is due from EOC.

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PERMIT HISTORY

The permit history of P3/S3 is summarized in Table 3 below:

Table 3

Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
		P68509	?	No info found in OnBase. PO P68509 is shown on PO M17406 as the previous permit to A/N C34167
C34167		M17406	12/1/82	Only copy of C&C PO M17406, dated 4/6/82, is shown in OnBase. No other info found.
142570		M57472	7/8/87	No evaluation found in OnBase to describe purpose of application submittal. PAATs lists application type 50 but not sure what was modified. Compared to the previous PO (M17406), two 6,300 bbl capacity 'slop oil tanks' were added in the equipment description but are 'covered under separate permit'. Permit unit is listed as 'oil/water separator system' instead of 'wastewater treatment system' currently identified in FP.
165766		D16131	1/13/90	No docs in OnBase other than copy of PO D16131. Compared to previous PO M57472, looks like Air Floatation Unit (4 cells) and two oil skimmers were added on to the equipment description.
280296		D72446	4/16/93	Change of ownership.
285494	-	-	-	This application was submitted to replace fixed roof tank T-1401 with T-6006 (an internal floating roof with wiper seal) to comply with R1176(e)(2). However, the project was cancelled prior to issuance of PC. The facility decided to install a vapor bladder seal for T-1401 instead because of 'cost effectiveness'. ROG emissions were calculated to be 291.1 lbs/yr for T-6006.
287851	1/3/94	D90083	4/21/95	This application was submitted to modify T-1401 with a vapor bladder seal system as discussed above. No emissions calcs were found in the folder but the emissions in NSR

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Permit to Construct		Permit to Operate		Description of Modification
No.	Issue Date	No.	Issue Date	
				for this project were reported as 291.1 lbs/yr, even though the project for A/N 285494 was cancelled (see above). It appears that District permit engineer assumed emissions from the IFR (with wiper seal) to be that of a fixed roof tank (with bladder seal) based on a letter dated 10/28/93 from EOC and used it for A/N 287851 NSR entry ¹ .
471225	-	-	-	Application submitted to reflect modification of T-1401 from fixed roof w/ bladder system to internal floater with mechanical shoe seal, Category A, has taken place without PC. Also requested the underground sumps listed in the permit to be identified as junction boxes, with certain ones connected to carbon drums (see Table 1 for details).

¹To ensure the NSR emissions entry is accurate for this permit unit, USEPA Tanks 4.09 program was used to recalculate emissions for A/N 287851, which was based on emissions of an IFR tank with bladder seal under A/N 285494. The report is contained in Attachment 1 for reference. As shown in the report, the emissions for T-1401 should be 430 lbs/yr (1.18 lbs/day). An adjustment in the NSR database for A/N 287851 will be made.

EVALUATION

Equipment ID(s)	Conclusion and Recommended Action
D54, D55, D59, D60, D61, D62, D63	According to EOC, these devices are not used for storage of wastewater or separation of petroleum liquids, VOC containing liquids, water and/or solids. Instead, they are underground access points with fixed covers, as required by Rule 1176(e)(5), to the wastewater system and, therefore, should be better categorized as junction boxes instead of sumps. The reclassification of the devices has no impact on ROG emissions as the 500 ppmv limit, pursuant to Rule 1176(e)(1), is applicable to both sumps and junction boxes. It is recommended that the requested change to these devices be made.
D56, D57, D58	Please see discussion above for recommendation to reclassify these devices as junction boxes instead of sumps. The request to proactively add control equipment [carbon drum(s)] will further reduce emissions from these 3 junction boxes. It is recommended that the requested

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Equipment ID(s)	Conclusion and Recommended Action
	changes to these devices be made.
D64	<p>The modification to replace the bladder seal of this fixed roof tank with an internal floating roof with mechanical shoe seal, Category A, has been determined to have negligible impact on emissions based on calculations using EPA's Tanks 4.09 program. The report is contained in Attachment 2 for reference. As shown in Table 4 below, the emissions impact from this modification is a reduction of 6.23 lbs/yr of ROG emissions. The parameters used in the Tanks 4.09 program were based on information in the tank data sheet provided by EOC for oily water storage for T-6006. Since there is no emissions increase from this modification, it is recommended the requested changes be incorporated into the permit.</p> <p>Note that D64 is a surge tank as it stores waste water only for a few hours. Since the facility has been shut down for a few years, there is no way to determine this. If the tank was used to store waste water, then it may need to be a separate permit unit.</p>

Table 4 – Tank T-1401 Emissions

Components	Pre-Mod Loss with Bladder Seal Fixed Roof				Post-Mod Loss with Mechanical Seal, Fixed Roof with Internal Floater			
	Working Loss	Breathing Loss	Emissions		Working Loss	Breathing loss	Emissions	
			Lbs/yr	Lbs/day			Lbs/yr	Lbs/day
Oily Water	326.75	103.19	429.94	1.18	326.75	96.96	423.71	1.16

RULE REVIEW

PART 1 SCAQMD REGULATIONS

Rule 212	Standards for Approving Permits	November 14, 1997
	<p>The permit unit in this evaluation meets all criteria in Rule 212 for PO issuance and is expected to operate without emitting air contaminants in violation of Division 26 of the State H&SC or in violation of AQMD rules and regulations. Public notice is not required per Rule 212 because it has been determined that (1) the permit unit is well beyond 1000 feet from the outer boundary of a school [R212(c)(1)]; (2) there is no emissions increase from the actions taken under this evaluation [R212(c)(2)]; and (3) without any emissions increase, there is no increase in cancer risk [R212(c)(3)]. Compliance is expected.</p>	

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Rule 401	Visible Emissions	November 9, 2001
Visible emissions are not expected under normal operating conditions. Compliance is expected.		

Rule 402	Nuisance	May 7, 1976
Odor problems and nuisance complaints are not expected under normal operating conditions. Compliance is expected.		

Rule 463	Organic Liquid Storage	December 7, 1990
<p>Paragraph (c) of this rule requires that tanks with a capacity of 39,630 gallons or greater used for storing organic liquid with a true vapor pressure of 0.5 psia or greater under actual storage conditions must be equipped with an external or internal floating roof or vapor recovery system with a 95% control efficiency.</p> <p>The capacity of Tank T-1401 is 1100 barrels (46,200 gallons) and the oily water contained in this tank can potentially have a true vapor pressure up to 0.5 psia according to the tank summary sheet provided by EOC. However, T-1401 operates as a surge tank and is not used for storage. Hence, the requirements of Rule 463 are not applicable to T-1401. Nonetheless, the tank has been retrofitted with an internal floating roof (with a liquid mounted primary seal – Mechanical Shoe, Category A).</p>		

Rule 1176	VOC Emissions from Wastewater Systems	September 13, 1996
<p>This rule applies to wastewater systems and associated control equipment located at petroleum refineries to limit VOC emissions. Pursuant to §(c)(26), wastewater system is defined as any system which consists of one or more process drains, sewer lines, junction boxes, manholes, sumps, or wastewater separators (defined as any device used to separate petroleum and/or VOC containing liquid from wastewater such as separator forebays, clarifiers and tanks, including dissolved air, induced gas and induced air flotation tanks) and their associated components, used to receive, convey, separate, treat or process wastewater.</p> <p>For D54 – D63, please see discussion in Evaluation section for compliance with R1176 . According to EOC, these devices are not used for storage of wastewater or separation of petroleum liquids, VOC containing liquids, water, and/or solids but are merely access points to the wastewater system which should be more accurately defined as ‘junction boxes’ according to §(c)(15). As junction boxes, they are totally enclosed with a fixed cover, as currently described in the permit, which can have an open vent pipe no more than four inches in diameter and at least three feet in length pursuant to §(e)(5). EOC has elected to connect 3 (out of the total 10) junction boxes to carbon drum(s) to ensure compliance with the 500 ppmv VOC limit set forth in §(e)(1) for these potentially higher emitting</p>		

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wastewater sewer line access points. Compliance is expected.

D64 (Tank T-1401) is described in P3/S3 as an oily water surge tank but can also be considered a wastewater separator pursuant to Rule 1176. As a wastewater separator subject to this rule, EOC meets the requirement of §(e)(2) by retrofitting the tank with a floating cover equipped with seals (ie: internal floating roof with mechanical shoe seal). Compliance is expected.

Rule 1178	Further Reduction of VOC Emissions from Storage Tanks at Petroleum Facilities	April 7, 2006
	<p>Subparagraph (d)(3)(D) of this rule requires that IFR tanks with a capacity of 19,815 gallons or greater used for storing organic liquid with a true vapor pressure > 0.1 psia under actual storage conditions, located at any petroleum facility that emit >40,000 pounds (20 tons) per year of ROG in any emission inventory year beginning year 2000, must be equipped with a rim seal system consisting of either a primary, or a primary and secondary seal meeting the requirements of subparagraph (d)(1)(B).</p> <p>As indicated under Rule 463 discussion, T-1401 is not used for storage but merely operates as a surge tank and is not subject to Rule 1178. Nonetheless, the rim system of the tank has been replace with an IFR equipped with a liquid mounted primary mechanical shoe seal, Category A.</p>	

REG IX NSPS

Subpart K, Ka, Kb	Standards of Performance for Storage Vessels for Petroleum Liquids; for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels).	May 11, 2011
	<p>According to the initial Title V Permit's Statement of Basis (SOB) for EOC, Tank T-1401 was constructed prior to 6-11-73 and has not been reconstructed or modified since then. Pursuant to 40CFR 60.14(a), the internal floating roof addition of T-1401 did not result in any emissions increase and, hence, does not constitute a 'modification', which would have subjected the tank to NSPS Subpart Kb if it was indeed operated as a oily water storage tank. However, the tank is used as a surge tank in the Waste Water Treatment System and the provisions of this rule do not apply. Nonetheless, as described under Rule 463 and 1178, the tank has been retrofitted with an internal floating roof (with a liquid mounted primary seal – Mechanical Shoe, Category A).</p>	

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REG X NESHAP

40CFR 61, Subpart FF	National Emission Standards for Benzene Waste Operations
	<p>This subpart defines a major source as any chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery with 10 mega gram per year (Mg/yr) (11 tons/yr) or more of benzene in the waste streams. Pursuant to the facility's Statement of Basis (SOB) for initial Title V permit, EOC is not a major source under this regulation since its reported total annual benzene (TAB) quantity is less than 10 Mg/yr.</p> <p>While the facility is not subject to the control standards of the subpart per se, it is nonetheless subject to certain recordkeeping and reporting requirements. Facility Condition F52.1 has been tagged to the facility to indicate it is subject to the recordkeeping and reporting requirements of §61.356 and §61.357, respectively. Compliance is expected.</p>

40CFR 63, Subpart CC	National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries
	<p>In its SOB for initial Title V permit, EOC provided an inventory of HAP emissions, including HAP PTE, to the District to demonstrate it is not a 'major' HAP source, which is defined as a source emitting 10 tons per year of any single HAP or 25 tons per year of all HAPs combined. As an 'area' HAP source emitting less than these thresholds, the facility is not subject to any major source Maximum Achievable Control Technology (MACT) Standards, including 40CFR 63, Subpart CC, except for the reporting and recordkeeping requirements of 40CFR 63, Subpart CC. These requirements have been incorporated into the Title V permit as Facility Condition F16.1. Compliance is expected.</p>

40CFR 63, Subpart A⁷	National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing
	<p>This rule limits PAH emissions to 0.003 lb/ton or PM emissions to 1.2 lb/ton of asphalt charged to the blowing stills at EOC. Pursuant to Table 4 of this subpart, ECO is utilizing its incinerator, B-501, to comply with this requirement and has indicated source test will be performed to demonstrate compliance as soon as asphalt blowing operations are resumed. According to an email from EOC dated 10/19/12 (contained in application folder 383221), the facility has not blown asphalt since the compliance date of 12/2/10. The upcoming source test (after asphalt blowing operation is resumed) will verify whether the current combustion zone temperature requirement of 1400°F set forth in condition C8.1 is sufficient to satisfy the monitoring requirement of § 63.11563. Compliance is expected.</p> <p>Note that although Subpart A⁷ is applicable to the facility, the applicable</p>

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requirements of this subpart do not apply to the Waste Water Treatment System.

Reg XIII NSR

Rule 1303	Requirements	December 7, 1995
	<p>This rule specifies that the Executive Officer or designee shall deny the Permit to Construct for any new or modified source which results in a net emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia, unless BACT is employed, Modeling is used to demonstrate no significant change (increase) in quality concentration and Offsets are provided.</p> <p>The reclassification of devices D54 – D63, as explained in the Evaluation section, does not result in any increase in emissions. The connection of devices D56, D57 and D58 to carbon drum(s) will, effectively, result in an emissions decrease. For device D-64 (T-1401), retrofitting the tank with an IFR is considered a physical modification of the tank pursuant to Rule 1302(x). Although, there is no net increase in emissions from this modification as discussed earlier, a NSR event has occurred. As such, a throughput limit shall be imposed to ensure emissions remain unchanged pursuant to Rule 1313(g). The NSR emissions for A/N 287851 (derived from previous A/N 285494) were based on a tank throughput of 462,000 barrels per year. As such, T-1401 has been tagged with device condition C1.xx to ensure the monthly throughput does not exceed 38,500 barrels for this latest change under A/N 471225. Compliance is expected.</p> <p>As noted in footnote 1 in the Permit History section of this evaluation, USEPA Tank 4.09 program was used to recalculate emissions for T-1401 under A/N 287851 when the bladder seal system was installed. The NSR database will be updated with a baseline emissions of 1.18 lbs/day (430 lbs/yr).</p>	

Reg XIV Toxics

Rule 1401	NSR of Toxic Air Contaminants	September 10, 2010
	<p>As noted above, there is no emissions increase of any nonattainment air contaminant from the changes made under this evaluation. Emissions should actually decrease with the installation of carbon drum(s) for D56-D58, D61-D62 and an IFR (with mechanical shoe seal) for D64.</p> <p>Rule 1401(g)(1)(B) exempts equipment from the requirements of Rule 1401 if the modification of the permit unit causes a reduction or no increase in the cancer burden, maximum individual cancer risk (MICR), or acute (HIA) or chronic (HIC) health indices at any receptor location. Hence, the requirements of this rule are not applicable.</p>	

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Reg XX RECLAIM

Rule 2005	NSR for RECLAIM	June 3, 2011
	EOC is designated as a NOx and SOx RECLAIM facility. However, the Waste Water Treatment System is neither a NOx nor a SOx emissions source. As such, this regulation does not apply.	

Reg XXX TITLE V PERMITS

Rule 3002	Requirements	November 14, 1997
	EOC is designated as a Title V facility. The initial Title V permit was issued on October 1, 2009.	
	The permit actions under this evaluation are considered a Minor TV permit revision because they do not meet the requirements for an Administrative, De Minimus or Significant revision pursuant to Rule 3000. As a Minor revision, the proposed permit and a copy of the evaluation will be submitted to the EPA for review. Compliance is expected.	

STATE REGULATIONS

CEQA	California Environmental Quality Act
	CEQA requires that the environmental impact of proposed projects be evaluated and that feasible measures be considered to reduce, avoid or eliminate identified significant adverse impacts. The CEQA Applicability Form (400-CEQA) submitted with A/N 471225 indicates there are no adverse impacts expected which would trigger the preparation of a CEQA document. Hence, a CEQA analysis is not required.

CONCLUSION

The Wastewater Treatment System is expected to operate in compliance with all AQMD, State and Federal Rules and Regulations. Therefore, a Permit to Operate is recommended with the conditions listed on pages 3 - 4 of this evaluation.

The following is a summary of the permit actions under this evaluation:

A/N	Equipment Description	Device ID	Recommended Action
471225	See draft permit on page 1-3 of evaluation.	D54-D64, D67, D313, D350	Approve PO