

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 1
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

CHANGE OF CONDITIONS EVALUATION

COMPANY NAME

BP West Coast Products, LLC (BP Carson Refinery) SCAQMD ID # 131003

EQUIPMENT LOCATION

1801 E. Sepulveda Blvd
 Carson, CA 90749
 Facility ID#: 131003 Facility Type: NOx & SOx RECLAIM (Cycle 2), Title V

EQUIPMENT DESCRIPTION:

Additions to the equipment description are noted in underlines. Deletions are noted in strikeouts.

Section D of BP West Coast Products Facility Permit, ID# 131003

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 16 : PETROLEUM STORAGE TANKS					
System 1 : FIXED ROOF TANKS					S13.8
STORAGE TANK, FIXED ROOF, NO. 23, WITH TWO 20 HP. AGITATORS, 80,000 BBL; DIAMETER: 117 FT 2 IN.; HEIGHT: 41 FT A/N: 395509 <u>449865</u>	D1091			HAP: (10)[40CFR63 Subpart CC, #5-25-2001]	B22.4, <u>B22.15</u> , <u>C1.xx</u> , K67.5, K67.21

COMPLIANCE RECORD REVIEW:

A two year printout of the facility's compliance history is shown in Attachment 1. All NOV's issued to this facility are listed as either in compliance or closed. There are no open NOV's currently.

BACKGROUND:

This application was received by the AQMD on October 21, 2005 from BP West Coast Products for the Change of condition of storage tank 23 (D1091). In this application, BP is requesting a change in permit condition to lower the maximum allowable true vapor pressure limit of stored organic liquids from <0.5 to <0.1 psia under actual operating conditions.

Permitting history for this tank:

- This subject tank is currently covered by permit no. F50045 (A/N 395509).

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 2
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

- This tank was constructed in 1940s used to store fuel oil; therefore, it was exempt from a written permit under rule 219.
- In 1976, this tank was altered to store crude oil and vented to vapor recovery system under A/N C-02104 (P67390).
- In 1992, under A/N 253967 (D63053) this tank was modified by adding an agitator to ensure that any free water in the tank is thoroughly mixed to prevent slugs of water from reaching the coker.
- In 2002, there was a change of ownership from ARCO Products Company to BP West Coast Products under A/N 395509 (F50045).

District Rule 1178 – Further Reductions of VOC Emissions For Storage Tanks at Petroleum Facilities was adopted by the District’s Governing Board on December 11, 2001 to further reduce evaporative emission losses and minimize leaks from storage tanks at petroleum facilities. Rule 1178(d)(4) requires a facility exceeding 20 tons annual VOC emissions from emission inventory year 2000 to either equip all fixed roof tanks containing material having a true vapor pressure greater than or equal to 0.1 psia with an emission control system with an overall control efficiency of 95% by weight or to vent tank emissions to a fuel gas system, and to ensure all tank gauges and roof openings to be vapor tight.

As a result, BP submitted the following application listed in Table 1 requesting a change in permit condition to lower the maximum allowable true vapor pressure limit of stored organic liquids from <0.5 to <0.1 psia under actual operating conditions. As such, this tank would not be subject to installation of control equipment otherwise required under Rule 1178.

Table 1 – AQMD Applications Submitted

A/N	Equipment	Device ID	Type	Status	Date Submitted	Requested Action	Previous A/N
449865	Storage Tank No. 23, Fixed Roof	D1091	60	20	10/27/2005	Reduce allowable true vapor pressure from <0.5 psia to <0.1 psia	395309/ F54045

FEE EVALUATION:

The fees paid for the applications submitted are as follows:

Table 2 – Application Fees Submitted

A/N	Equipment	Type	Fee Schedule	Fee Required, \$	Fee Paid, \$
449865	Storage Tank No. 23, Fixed roof	60	A	\$322.48	\$322.48

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 3
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

PROCESS DESCRIPTION:

Storage tank 23 listed in the table above is fixed roof tank and is currently limited under permit condition to using materials with maximum allowable true vapor pressure of less than 0.5 psia under actual operating conditions. Table 3 below shows the products stored in the previous two compliance years:

Table 3 – Storage Tank Use During Prior Two Compliance Years

A/N	Equipment	Device ID	Product Stored
449865	Storage Tank No. 23, Fixed Roof	1091	Storing residual oil

According to BP, materials which may be stored in this tank in the future include fuel oil, coker feed, gas oil, slop oil, and diesel. The Material Safety Data Sheets provided by the applicant for these products are shown in Attachment 2.

EMISSIONS:

Change of Condition in True Vapor Pressure

The emissions from tank 23 were calculated using EPA tanks 4.09 program (Attachment 3). The TANKS program is designed to estimate emissions of organic chemicals from storage tanks. The calculations are performed according to EPA’s AP-42. After the user provides specific information concerning a storage tank and its liquid contents, the program produces a report that estimates the chemical emissions for the tank on an annual (or partial year) basis. The equations used in the program are documented in AP-42, Section 7.1, Organic Liquid Storage Tanks.

The modification involves lowering the maximum allowable true vapor pressure limit of stored organic liquids from <0.5 to <0.1 psia under actual operating conditions. Due to the lower volatility of the stored material, the modification is expected to reduce the VOC.

According to Rule 1306, the emissions will be calculated to the maximum Potential to emit. Using the current formula of the EPA tanks 4.09 program, the baseline emissions is calculated using the current true vapor pressure limit of stored product at 0.5 psia in condition B22.4 versus the potential emissions of true vapor pressure of stored product at 0.1 psia and using a monthly throughput of 300,000 barrels as BP requested in the attached email by Robert Nguyen on March 20, 2013

A copy of the TANKS 4.0 Emission Report is attached in Attachment 3. Table 4 below shows a summary of the resulting emissions:

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 4
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

Table 4 - Summary of VOC Emissions

<i>Tank No.</i>	<i>Current Product</i>	<i>Current Throughput (barrels/month)</i>	<i>Emissions with current vapor pressure & current throughput lbs/yr (lbs/day)</i>	<i>Proposed Product with true vapor pressure of 0.1 psia</i>	<i>Proposed throughput (barrels/month)</i>	<i>Emissions with proposed products & new throughput</i>	<i>Change</i>
23 D1091	<i>Product of true vapor pressure of 0.5 psia</i>	55,342 barrels/month	66,703.90 lbs/yr 182.7 lbs/day	<i>Product of true vapor pressure of 0.1 psia</i>	300,000 barrels/month	44,523.62 lbs/yr 121.98 lbs/day	-22058.29 lbs/yr -60.4 lbs/day

See Attachment 4 the MSDS submitted by BP.

Since the reduction in allowable true vapor pressure is expected to decrease the VOC emission, a decrease in toxic health risk is also expected.

RULES EVALUATION:

PART 1 SCAQMD REGULATIONS

Rule 212	Standards for Approving Permits	November 14, 1997
	<p>This proposed modification meets all criteria in Rule 212 for permit approval. The new modification is designed so it can be expected to operate without emitting air contaminants in violation of Division 26 of the State Health and Safety Code or in violation of AQMD's rules and regulations.</p> <p>The change in condition for true vapor pressure does not constitute a significant project because (1) the modified permit unit is not located within 1000 feet of a school; (2) the emissions increase does not exceed the daily maximum specified in subdivision (g) of this rule (30 lbs/day); and (3) the modified permit unit does not have an increased cancer risk greater than, or equal to, one in a million (1×10^{-6}) during a lifetime of 70 years or pose a risk of nuisance.</p>	

Rule 402	Nuisance	May 7, 1976
	<p>Nuisance complaints associated with the above project are not expected under normal operating conditions.</p>	

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 5
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

Rule 463	Organic Liquid Storage	May 6, 2005
	This rule applies to any above-ground tank with capacity 19,815 gallons or greater for storing organic liquids.	
463(c)	<p>The tank roof requirements of Rule 463 apply to storage tanks with capacity of 150,000 liters (39,630 gallons) or greater and storing an organic liquid having a true vapor pressure of 25.8 mm Hg (0.5 psi) absolute or greater. Storage tanks with capacity of 75,000 liters (19,815 gallons) capacity or greater and storing any organic liquid having a true vapor pressure of 77.5 mm Hg (1.5 psi) absolute or greater under actual storage conditions must also comply with the tank roof requirements of this rule.</p> <p>Although this tank is greater than 69,630 gallons capacity, BP is proposing a condition limiting true vapor pressure of the stored organic liquid below 77.5 mm Hg (1.5 psi) absolute. As a result, the tank roof requirements are not applicable.</p>	
463(d)	No gasoline will be stored in this tank. Other paragraphs of the subdivision of this rule are applicable only to external and internal floating roof tanks.	
	Compliance with Rule 463 is expected with proper recordkeeping and inspections.	

Rule 1149	Storage Tank Cleaning and Degassing	July 14, 1995
	When the tank is open to the atmosphere to clean or degas the tank, emissions must be controlled unless the organic liquid which was stored has a Reid vapor pressure less than 202 mm Hg (3.9 psi). Since BP is proposing a condition limiting true vapor pressure of the stored organic liquid below 5.2 mm Hg (0.1 psi) absolute, emissions control during cleaning and degassing are not required and the provisions of this rule are not applicable.	

Rule 1178	Further Reduction of VOC emissions from Storage Tanks at Petroleum Facilities	April 7, 2006
1178(b)	The rule applies to all aboveground storage tanks that have capacity equal to or greater than 75,000 liters (19,815 gallons), are used to store organic liquids with a true vapor pressure greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions, and are located at any petroleum facility that emits more than 40,000 pounds (20 tons) per year of VOC in any emission inventory starting with the emission inventory year 2000. BP is requesting a change in permit condition to lower the maximum allowable true vapor pressure limit of stored organic liquids from <0.5 to <0.1 psia under actual operating conditions in order to avoid the requirements of Rule 1178.	

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 6
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

REG XIII	New Source Review (NSR)		December 6, 2002
	Application Deem Complete Year: 2005		
	NSR does not apply to this application since there is no emission increase of any non-attainment air contaminants. The proposed change in condition will likely reduce the VOC emissions.		
	The NSR histories for these tanks are summarized below:		
	Description of NSR History		
	Tank 23 was originally constructed in 1940s. This tank was in fuel oil service and exempt from permit requirements until 1975, when the tank was altered to store crude oil and connected to vapor recovery system and initially permitted. The initial evaluation stated the tank was subject to NSR and the permit was issued with the standard condition that the tank must be connected to vapor recovery system when storing organic liquids with vapor pressure greater than 1.5 psia under actual storage conditions. In 1992, under A/N 253967, this standard condition was revised for allowable vapor pressure to 0.5 psia or lower. The facility permit has a true vapor pressure condition limiting the stored product to 0.5 psia (B22.4).		
	The previous NSR emissions entered for this storage tank is listed below. The emissions calculations are shown in Attachmrent3.		
	Tank #	NSR VOC Emissions, lbs/day	
		Previous	Current
	23	A/N 395509: 2 . 183* *it will be corrected to maximum PTE storing product of TVP of 0.5 psia and not vented to VRS and using current EPA tanks 4.09 program.	A/N 449865: 122

Rule 1303(a): BACT & Rule 1303(b): Modeling and Offsets	If NSR were to apply to this modification, Rule 1303(a)-BACT and 1303(b)-Modeling and Offsets should not apply since there will be no emission increase by changing the permit condition to reduce the maximum allowable true vapor pressure limit of stored organic liquids from <0.5 to <0.1 psia under actual operating conditions.
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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 7
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

Rule 1401	New Source Review of Toxic Air Contaminants	May 2, 2003
	<p>As noted above, there is no emission increase of any nonattainment air contaminant from lowering the maximum allowable vapor pressure for the materials stored in these fixed roof tanks. Emissions should actually decrease with the lower maximum limit. Rule 1401(g)(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.</p> <p>Federal NSR for toxics does not apply since this is not considered a reconstruction per 40CFR63, Subpart A, §63.2.</p>	

Regulation XX	RECLAIM	March 16, 2001
	<p>BP has been designated as a RECLAIM facility and is a participant in both the NOx and SOx markets. However, these tanks are not heated and the storage tanks are not associated with any combustion equipment.</p>	

Regulation XXX	Title V	Amended November 14, 1997
	<p>The Title V Permit system is the air pollution control permit system required to implement the federal Operating Permit Program as required by Title V of the federal Clean Air Act as amended in 1990. This regulation defines permit application and issuance procedures as well as compliance requirements associated with the program. An initial Title V permit has been issued for BP, effective 9/1/09.</p> <p>Because the proposed modifications do not result in increases in daily maximum emissions, but also do not meet any of the criteria for an Administrative Revision in District Rule 3000(b)(1), these applications qualify as a Title V Minor Revision per Rule 3000(b)(15). This means that EPA 45-day review of the draft permit is required, per Rule 3003(j)(1)(A). Public review is not required, per 3006(b). A copy of the final permit will also be submitted to the EPA within 5 working days of its issuance, per Rule 3003(j)(1)(E).</p>	

PART 2 STATE REGULATIONS

California Environmental Quality Act (CEQA)	
	<p>This proposed modification is not a significant project and is not subject to CEQA review.</p>

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 8
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

PART 3 FEDERAL REGULATIONS

40CFR Part 60 Subpart K	Subpart K—Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978
	This subpart applies to all storage tanks which were constructed, reconstructed or modified after June 11, 1973, and prior to May 19, 1978. According to 40CFR Part 60 Subpart A – General Provisions: §60.2 Definitions, <i>modification</i> “means any physical change in, or change in the method of operation of, an existing facility which <u>increases</u> the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.” This storage tank was constructed prior to June 11, 1973. .

40CFR Part 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984
	As noted previously, the tank was constructed prior to June 11, 1973, and there are no records to indicate the tank have been reconstructed to date. Therefore, Tank No. 23 is not subject to Subpart Ka.

40CFR Part 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commences after July 23, 1984
	As noted previously, all tanks were constructed prior to June 11, 1973, and there are no records to indicate the tanks have been reconstructed or modified after July 23, 1984. Therefore, Tank No 23 is not subject to Subpart Kb.

40CFR Part 63 Subpart CC	National Emission Standards for Hazardous Air Pollutants From Petroleum Refineries
	Group 1 storage vessel means a storage vessel at an existing source that has a design capacity greater than or equal to 177 cubic meters <i>and</i> stored-liquid maximum true vapor pressure greater than or equal to 10.4 kilopascals and stored-liquid annual average true vapor pressure greater than or equal to 8.3 kilopascals <i>and</i> annual average HAP liquid concentration greater than 4 percent by weight total organic HAP. Those tanks not meeting the definition of a Group 1 storage vessel are by definition Group 2 storage vessels under this subpart. Group 1 storage vessels are subject to specific control requirements of this subpart. While Group 2 storage vessels are not subject to control

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 9
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

	<p>requirements listed in this subpart, they are subject to the recordkeeping requirements.</p> <p>These tanks will store material with maximum true vapor pressure below 0.1 psia, or 0.69 kilopascals; hence, the average true vapor pressure will also be below 0.69 kilopascals. Since these tanks do not meet the definition of a Group 1 storage vessel, they are considered Group 2 storage vessels. BP must maintain records showing the storage tanks meet the determination of a Group 2 storage vessel, vessel dimensions, and analysis of capacity. These records must be retained for 5 years.</p> <p>These tanks are expected to comply with the recordkeeping requirements of this regulation.</p>
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RECOMMENDATIONS

A permit to operate is recommended subject to the following conditions:

The following permit conditions shall apply to the storage tank in order to comply with all applicable District, State, and Federal standards. Additions and deletions to the conditions are noted in underlines and strikeouts, respectively.

SYSTEM CONDITIONS

S13.8 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	1178

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

[Systems subject to this condition: Process 16, System 1]

DEVICE CONDITIONS

B22.4 the operator shall not use this equipment with materials having a (n) true vapor pressure of 0.5 psia or greater under actual operating conditions.

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

[Devices subject to this condition : D1085, ~~D1094~~, D1104, D1117]

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 10
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

B22.15 The operator shall not use this equipment with materials having a(n) true vapor pressure of 0.1 psia or greater under actual operating conditions.

To demonstrate compliance with the true vapor pressure limit requirement, the operator shall maintain on file a copy of the Material Safety Data Sheet (MSDS) of the material stored.

If the MSDS does not show the true vapor pressure, the operator shall determine the flash point of the organic material stored using ASTM Method D-93 whenever there is a change in the product type. Those materials having a flash point less than 100 degrees F as determined by this test will be considered as having a true vapor pressure of greater than 5 mm Hg (0.1 psi) absolute under actual storage conditions. The test must be conducted within ten days of changing product types.

The operator shall keep records of the date when there is a change in material stored, along with the MSDS

[RULE 1178, 4-7-2006]

[Devices subject to this condition : D1107, D1108, D1109, D1110, **D1091**]

C1.XX The operator shall limit the throughput to no more than 300,000 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 tank level 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 tank level. For the purpose of this condition, continuous recording is defined as one per hour.

The operator shall calculate the total one-way tank level movement at the end of each month. The total one-way tank level movement shall be determined for the calendar month and shall be expressed as feet.

The ATLG 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, throughput shall be determined by the hourly tank level data averaged for 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 data averaged from the previous 30 days prior to the time that the ATLG went out of service.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 11
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

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

[Devices subject to this condition : D1091]

K67.5The operator shall keep records, in a manner approved by the district, for the following parameter(s) or item(s):

Throughput and vapor pressure of stored liquid.

[RULE 1178, 4-7-2006; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 463, 5-6-2005]

[Devices subject to this condition :D800,D801,D909,D1067, D1069,D1070, D1071,D1072, D1073, D1074, D1075, D1078, D1079, D1080, D1081, D1083, D1084, D1085, D1086, D1087, D1089,D1090, D1091, D1092,D 1093, D1098, D1099, D1102, D1104, D1106, D1107, D1108, D1109, D1110, D1111, D1116, D1120, D1121, D1122, D1123, D1124, D1125, D1126, D1128, D1130, D1139, D1140, D1141, D1142, D1144, D1145, D1146, D1153, D1159, D1160, D1164, D1165, D1175, D1185, D1186, D1187, D1193, D2789]

K67.21 The operator shall keep records, in a manner approved by the district, for the following parameter(s) or item(s):

The operator shall determine the true vapor pressure of each material stored in the equipment by one of the following methods: 1) sample and test the materials stored, 2) derive the vapor pressure using engineering calculations, or 3) maintain on file a copy of the Material Safety Data Sheet (MSDS) of the material stored._

Records of material stored, and their MSDS if applicable, shall be retained for a period of five years and made available to the Executive Officer upon request.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D80,D 1000, D1001, D1069, D1070, D1071, D1072, D1084, D1085, D1090, D1091, D1103, D1104, D1111, D1115, D1117, D1119, D1120, D1122, D1128, D1130, D1140, D1147, D1148, D1162, D1163, D1164, D1193, D2612, D2789, D2850]

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 12	PAGE 12
	APPL. NO. See Table 1	DATE March 20, 2013
	PROCESSED BY: Saandrawis	CHECKED BY

Attachments

1.	NOV's and NC's Issued
2.	MSDS Sheets
3.	Emissions Calculations
4.	Previous Permits
5	Annual Emissions Reports