

Title V Permit Evaluation

Site Number: A4022

Site Name: SFPP, L.P.

Site Address: 1550 Solano Way, Concord, CA 94520

Periodic Monitoring:

Summary Table(s)

VOC Sources

S# & Description	Federally Enforceable Limit Citation	Federally Enforceable Limit	Potential to Emit: tpy	Monitoring
S1, S2 (External floating roof 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)
	BAAQMD Condition # 5531, part 1	3,175,200 gallons/yr (each tank)	N/A	Monthly record keeping (existing)
S4 (External floating roof 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)
S5, S6, S7 (External floating roof 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)
	BAAQMD Condition #13143, part 9	Gasoline: 1,400 million gallons/yr; Jet/Kerosene: 352 million gallons/yr	N/A	Daily record keeping (existing)
	BAAQMD Condition #13143, part 3	1400 degree Fahrenheit	N/A	Continuous monitoring and record keeping (existing)

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S8, S9, S11 (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)
	BAAQMD Condition #13143, part 9	Gasoline: 1,400 million gallons/yr; Jet/Kerosene: 352 million gallons/yr	N/A	Daily record keeping (existing)
	BAAQMD Condition #13143, part 3	1400 degree Fahrenheit	N/A	Continuous monitoring and record keeping (existing)
S10 (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)
	BAAQMD Condition #13143, part 10	353,808,000 gallons/yr	N/A	Daily record keeping (existing)
	BAAQMD Condition #13143, part 3	1400 degree Fahrenheit	N/A	Continuous monitoring and record keeping (existing)
S12, S13, S18 thru S26 (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)

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	BAAQMD 8-5-322; 40 CFR 60.113b(a)(1)	Secondary seal inspection	N/A	Measurement every 10 years, Visual Inspection/Record keeping (existing)
	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)
	BAAQMD Condition #13143, part 9	Gasoline: 1,400 million gallons/yr; Jet/Kerosene: 352 million gallons/yr (for S12)	N/A	Daily record keeping (existing)
S14 (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)
S27 (Oil/water separator)	BAAQMD 8-8-306.1	Roof seals and other opening gaps <0.125 inch	N/A	Visual Inspection (existing)
	BAAQMD Condition #3590, part 1	300 ppm	N/A	Portable hydrocarbon detector every 6 months (existing)
S29 (Additive storage tank-fixed roof)	BAAQMD Condition #5245, part 1	147,000 gallons/yr	N/A	Monthly record keeping (existing)
S40 (Pipeline surge system)	BAAQMD Condition #15574, part 1	30 switchover/day of storage tanks	N/A	Daily record keeping (existing)
S41 (Soil vapor extraction system)	BAAQMD 8-47-301; BAAQMD Condition #16699, part 3	Destruction efficiency of 99% by wt.	N/A	Monthly gas sampling and analysis and record keeping (existing)
	BAAQMD Condition #16699, part 1	300 scfm	N/A	Monthly gas sampling and record keeping (existing)

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	BAAQMD Condition #16699, part 2	POC:0.56 lb/day; Benzene: 144 lb/yr	N/A	Monthly gas sampling and analysis and record keeping (existing)
	BAAQMD Condition #16699, part 4	1400 degree Fahrenheit(thermal mode); 650 degree Fahrenheit (Catalyst mode)	N/A	Continuous monitoring and record keeping (existing)
S42 (Air Stripper)	BAAQMD 8-47-301; BAAQMD Condition #17450, part 3	Destruction efficiency of 98% by wt.	N/A	Monthly gas sampling and analysis and record keeping (existing)
	BAAQMD Condition #17450, part 1	600 scfm	N/A	Monthly gas sampling and record keeping (existing)
	BAAQMD Condition #17450, part 2	POC: 178 lb/yr; Benzene: 1.0 lb/yr	N/A	Monthly gas sampling and analysis and record keeping (existing)
	BAAQMD Condition #17450, part 4	600 degree Fahrenheit (Catalyst mode)	N/A	Continuous monitoring and record keeping (existing)
S1000, S1001, S1002 (sump tanks)	BAAQMD condition #15859, part 1	300,000 gallons/yr	N/A	Daily 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
	BAAQMD 8-18-304	Connection leak ≤ 100 ppm	N/A	Quarterly Inspection
	BAAQMD 8-18-305	Pressure relief valve leak ≤ 500 ppm	N/A	Quarterly Inspection
	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

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	BAAQMD 8-18-306.3.2	Mass emissions & non repairable equipment allowed	N/A	Daily inspection
	SIP BAAQMD 8-18-302	Valve leak ≤ 100 ppm	N/A	Quarterly inspection
	SIP BAAQMD 8-18-303	Connector leak ≤ 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 ≤ 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 ≤ 500 ppm	N/A	Measure leak quarterly/ Daily inspection
	SIP BAAQMD 8-25-303	Compressor leak ≤ 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 ≤ 500 ppm	N/A	Measure leak quarterly/Daily inspection
	SIP BAAQMD 8-25-306	Repeat leakers	N/A	Measure leak quarterly/Daily inspection

Permit Shield:

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The applicant did not request any permit shield

Alternate Operating Scenario:

The permit does not contain an alternate operating scenario.

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:

Permit conditions for S40 were revised.