



SOUTH COAST AIR QUALITY MANAGEMENT	Pages 5	Page 1
<i>ENGINEERING AND COMPLIANCE DIVISION</i> <i>Waste Management & Bulk Terminal Permitting</i>	A/N See Below	Date 04/18/13
CHEVRON USA (HUNTINGTON BEACH) PERMIT TO OPERATE EVALUATION	Processed by Ed O'Neal	Checked by

EVALUATION OF PERMITS TO OPERATE
-SECTION D-

COMPANY

Chevron Products Company (Huntington Beach)

Facility ID# 800302

MAILING ADDRESS & EQUIPMENT LOCATION

17881 Gothard Street
Huntington Beach, CA 92647

APPLICATION NO. 527453

TITLE V FACILITY PERMIT AMENDMENT APPLICATION, DE MINIMUS
SIGNIFICANT PERMIT REVISION, FOR A/Ns 400516, 504310, 542374 AND 5423755.

APPLICATION NO. 400516

WASTE WATER SYSTEM

APPLICATION NO. 542374

VAPOR RECOVERY SYSTEM

EQUIPMENT DESCRIPTION & PERMIT CONDITIONS

See draft permit included in this folder.

BACKGROUND

This is a Title V facility which is a truck loading terminal and storage tank facility which distributes refinery products. The facility currently operates four storage tanks, an ethanol truck unloading rack, three truck loading racks and a vapor recovery system.

An initial Title V permit was issued May 28, 2009 with subsequent revisions.



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The Waste Water System application was submitted on April 23, 2002 to add an additional slop tank. The Vapor Recovery System (VRS) application was submitted August 28, 2012 to add the new slop tank to the VRS permit .

The Title V Revision application was submitted September 20, 2011 along with a Rule 462 Compliance plan (A/N 542375). A Rule 463 Compliance Plan (A/N 5042310) was submitted December 9, 2009. The compliance plans are not reviewed here, but will be attached to the above Title V Revision application.

NOV/NC HISTORY

A review of compliance records did not show any Notices to Comply or public nuisance complaints for this facility in the past five years.

However, three Notices of Violation were issued; NOV P51147 on May 19, 2011 for failure to maintain and operate transfer equipment free of vapor leaks; NOV P51968 on January 7, 2011 for failing to keep a fixed roof tank vapor tight and for failing to comply with Title V permit condition; and, NOV P51962 on January 29, 2010 for failure to comply with Title V permit conditions, failure to maintain a CMS in good operating condition and operating contrary to their 462 plan conditions. These violations have all been corrected, an SEP was made with a new carbon adsorber planned with applications submitted, and the facility is in compliance and is expected to stay in compliance.

PROCESS DESCRIPTION

Chevron submitted the wastewater system application in 2002 proposing to add a 25,000 gallon slop tank to their oil/water separation system (which is now called a more accurate "waste water system" which is what Chevron calls this system). But before the Permit to Construct was issued, Chevron instead installed a 10,000 gallon slop tank, and SCAQMD reviewed the new equipment in a 2004 evaluation report included in this folder. However, the VRS permit needed to be modified too, and the wastewater system application languished until 2012 when Chevron submitted an application to modify their VRS to include their new 10,000 gallon slop tank.

A field evaluation was made to Chevron Huntington Beach and a report is attached in this folder.

When reviewing the Title V permit, Ken Yee of Chevron asked why the Techron additive tank and associated equipment was in the wastewater system permit as the Techron system has nothing to do with wastewater. Mr. Yee gave me an MSDS for the Techron and it showed a vapor pressure of 4.6 mmHg at 68 degrees, so the equipment is exempt from permitting per Rule 201(m)(3) and (m)(4) and will be removed from the wastewater permit. The additive tanks are listed in the Section D as Rule 219 equipment.



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EMISSIONS

Emission were properly calculated in the previous evaluation and will be used in this evaluation. The previous evaluation is included in A/N 400516's folder.

VOC Emission Change = 0.05 lb-ROG/day increase

RULES EVALUATION

Rule 212: Standards for Approving Permits and Issuing Public Notice

The permit unit is not located within 1000 feet of a school, emissions increase will not exceed the daily maximum specified in subdivision (G) of Rule 212; and the new permit unit will 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. Therefore, no public notice is required.

Rule 401: Visible Emissions

With proper operation of this equipment, visible emissions are not expected. Therefore, compliance with this rule is expected.

Rule 402: Nuisance

With proper operation of this equipment, visible emissions are not expected. Therefore, compliance with this rule is expected.

Rule 1173: Fugitive Emissions of Volatile Organic Compounds

Generally, as part of complying with BACT facility wide "applicable" requirements are imposed. However, Rule 1173 is not specifically applicable to bulk terminals.



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Regulation XIII - New Source Review

Rule 1303(a) – BACT – Since there will be no increase of maximum daily emissions greater than a pound, BACT is not required for this project. However, the new tank is vented to a VRS.

Rule 1303(b)(1) – Modeling – ROG emissions are not subject to modeling.

Rule 1303(b)(2) – Offsets – There are no increase in emissions requiring offsets.

Rule 1303(b)(4) – Facility Compliance – As mention in the NC/NOV review above, the facility is currently in compliance with all District Rules and Regulations.

Rule 1401: New Source Review of Toxic Air Contaminant

No change in toxic emissions.

REGULATION XXX – TITLE V PERMITS

This permit is a De minimus Significant Permit Revision (0.05 lb-ROG/day increase.)

California Environmental Quality Act (CEQA) - CEQA requires that the environmental impacts of proposed projects be evaluated and that feasible methods to reduce, avoid or eliminate identified significant adverse impacts of these projects be considered. The CEQA Applicability Form (400-CEQA) submitted indicates that the project does not have any impacts which trigger the preparation of a CEQA document. The expected impacts of the project on the environment are not significant: therefore a CEQA analysis is not required.

CFR 63 BBBB – Facility wide condition requires compliance with this NESHAP. The Waster water System is not subject to NESHAP because it handles a mixture of gasoline/water and thus does not handle “gasoline” as defined in the CFR.



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RECOMMENDATION

Based on the above evaluation, propose to the EPA that the waste water and VRS permit to operate be approved and incorporated into Section D of the Title V Permit following their 45-day review.

Also, include the proposed modified Rule 462 Plan (See A/N 542375) and Rule 463 Plan (A/N 504310.)