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		APPL. NO. 545841	DATE 3/07/2013
		PROCESSED BY: Cynthia Carter	CHECKED BY

**PERMIT TO OPERATE
Minor Revision**

COMPANY INFORMATION

Company Name: Valero Wilmington Asphalt Plant
Facility ID No. 800393

Mailing Address: 1651 Alameda St.
Wilmington, CA 90744

Equipment Location: 1651 Alameda St.
Wilmington, CA 90744

Contact Person: Matt Smith
(562)491-6799

EQUIPMENT DESCRIPTION

Table 1 shows the proposed modifications to the existing permit description for the Unloading Tank Car (D34). Additions to the description are noted in underlines and deletions are noted in ~~strikeouts~~.

Table 1 – Permit Equipment Description

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

Equipment	ID No.	Conn To	RECLAIM Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 6 CRUDE OIL AND <u>DISTILLATE TANK</u> TRUCK UNLOADING					
UNLOADING ARM, TANK CAR, <u>NAPHTHA,</u> <u>KEROSENE, GAS OIL, JET FUEL, DIESEL,</u> <u>FUEL OIL,</u> CRUDE, 4 TOTAL, DIAMETER: 4 IN A/N: 391910 <u>545841</u>	D34				E148.1
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 391910 <u>545841</u>	D160				H23.12

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CONDITIONS:

The following permit conditions shall apply to the subject equipment 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.

DEVICE CONDITIONS

E. Equipment Operation/Construction Requirements

E148.1 The operator shall not shut down the pump and disconnect the transfer hose from the pump until all liquid has been pumped into the receiving tank.

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

[Devices subject to this condition: D34]

H. Applicable Rules

H23.12 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1173

[**RULE 1173, 5-13, 1994**; RULE 1173, ~~6-1, 2007~~ **2-6-2009**]
 [Devices subject to this condition: D148, D149, D150, D151, D153, D154, D155, D156, D157, D159, D160, D161, D162, D163, D206, D208]]

COMPLIANCE RECORD REVIEW

A query of the AQMD Compliance Database for the past two years (2/1/11 to 2/26/13) identified one NOV that was issued to the Valero Wilmington Asphalt Plant (Facility ID 800393). The NOV has been brought back into compliance and it was not related to Unloading Tank Car (D34); thus the compliance database indicates that the equipment is currently in compliance with applicable rules and regulations.

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FEE EVALUATION

The BCAT for this tank will be changed to 251113(Railroad Car Unloading Hydrocarbons Misc), Schedule C. The fee charged for the requested administrative changes, which do not require any engineering evaluation and do not cause a change in emissions, was \$710.82 with an expedited fee of \$355.41, as listed in Rule 301(c)(3)(C) for Schedule C devices. An Administrative Permit Revision Fee of \$894.55 was also included (A/N 545840). A check in the amount of \$1,960.78 was submitted with this administrative permit application.

BACKGROUND/HISTORY

Valero Wilmington Asphalt Plant (Valero) operates an asphalt plant in the harbor area of Los Angeles County at 1651 Alameda Street, Wilmington, CA 90744. Crude oil is processed in the atmospheric and vacuum units, and the resulting naphtha and kerosene fractions are sold to other oil refineries for further processing. The bottom fractions from the vacuum unit are sold as asphalt.

Valero requested an administrative change (A/N 545841) for their unloading rail arm's (D34) equipment description to list several distillates in the permit description. The facility started to unload distillates sometime after the original 1989 permit was issued. The facility started to receive some of their product back instead of their customers wasting it. The associated tanks that are receiving returned product are Tanks 1A/1B/12/13 and Tanks 2/5/4/6/9. These tanks are presently permitted for crude oil and distillates, respectively. There are no emission increases because the emissions are accounted for in the associated tanks. No additional components will be installed.

Therefore, the equipment description should be updated to reflect the actual operation of the unloading arm. Because there was no oversight on the District's part (typos, etc), but instead there was an operation change on Valero's side, this application will be considered a Title V minor revision.

A summary of the Unloading Arm's permitting history is provided below in Table 3.

Table 3 – Unloading Arm Permitting History Summary

A/N	Date Issued	A/N Status	Permit Status	Description
183187	12/05/1989	31	inactive	Post NSR equipment. Permitted in 1989 to include tanks 1A, 1B, 12, 13
388941	11/07/01	31	inactive	Change of Ownership
391910	06/02/04	31	active	Admin appl to remove loading rate condition

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EMISSIONS

This administrative permit application proposes no changes to emissions. Thus, no emission calculations are provided in support of this application. The emissions from unloading the different commodities are accounted for in each permitted tank.

RULES EVALUATION

PART I: STATE REGULATIONS

CEQA California Environmental Quality Act (Amended 01/01/05)
The requirements of CEQA do not apply to this administrative permit application.

PART II: SCAQMD REGULATIONS

Rule 212 Standards for Approving and Issuing Public Notice (Amended 11/14/97)
Rule 212 requires public notice for any new or modified permit unit, RECLAIM source or Title V equipment that increases emissions of toxic air contaminants and increases health risk as specified in 212(c)(1) - (c)(3).

This administrative permit application is to update the device description only; therefore public notice is not required.

Rule 401 Visible Emissions (Amended 11/09/01)
Operation of the unloading arm is not expected to result in visible emissions. Therefore, compliance with this rule is expected.

Rule 402 Nuisance (Adopted 05/07/76)
Operation of the tank is not expected to result in a public nuisance. Therefore, compliance with this rule is expected.

Rule 462 Organic Liquid Loading May 14, 1999

This rule applies to facilities that load organic liquids with a vapor pressure 1.5psia into any tank truck, trailer, or railroad tank car.

The subject equipment is for unloading arms. Therefore, the organic liquid loading requirements of Rule 462 do not apply.

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**Rule
1173**

Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants

February 6, 2009

This rule applies to fugitive VOC components at refineries, chemical plants, oil, and gas production fields, natural gas process plants and pipeline transfer stations. It specifies leak control, identification, operator inspection, maintenance, and recordkeeping requirements for valves, pumps, compressors, pressure relief valves, and other components from which fugitive VOC emissions may emanate.

Valero conducts Rule 1173 monitoring, maintenance, and recordkeeping per Condition H23.12 They have submitted quarterly reports and their latest report (2011 2nd QTR) shows that all their valve leaks have been repaired.

Valero has shown compliance with this rule and continued compliance with this rule is expected.

Reg XIII

New Source Review (Amended 12/06/02)

New Source Review requirements apply to new, modified or relocated sources. The administrative changes requested in this application are for an existing source and do not constitute a modification. Thus, the requirements of this regulation do not apply.

Reg XIV

Toxics and Other Non-Criteria Pollutants

Rule 1401: New Source Review of Toxic Air Contaminants (Amended 09/10/2010)

Rule 1401 applies to new, modified or relocated permit units that emit Toxic Air Contaminants (TAC). This administrative permit application is for an existing source and does not include any modifications; therefore, the requirements of this regulation do not apply.

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Reg XXX Title V Permits (Amended 03/16/01)

Valero has been issued a Title V operating permit on August 7, 2012. This application is classified as a “Minor Permit Revision” because there was no oversight on the District’s part (typos, etc); there was an operation change on Valero’s side.

Minor Permit Revision: Meaning that the permit revision does not: require RACT, violate a regulatory requirement, require any significant change in monitoring terms or conditions in the permit, require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit, result in an emission increase of RECLAIM pollutants, result in an increase of emissions subject to NSR or HAP, change a permit condition to avoid an applicable requirement, install a new permit unit subject to NSPS, or modify or reconstruct an existing permit unit resulting in new or additional NSPS and/or NESHAP requirements

Since this proposed permit is applicable for a minor permit revision, R3003(j)(1)(S) requires an EPA 45 day review. The facility has requested an Expedited EPA review for economic reasons.

PART III: FEDERAL REGULATIONS

40CFR Part 63 Subpart CC National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries

This provision is for gasoline loading racks. Subpart CC refers to Subpart R. Since the loading arms do not load gasoline, the requirements of this regulation do not apply.

CONCLUSION:

Based on the above evaluation, it recommended that the following be issued:

A/N	Recommendation
545841	Issue Permit to Operate with conditions listed in the Conditions Section
545840	Revise Title V Permit