

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Issue Date: September 18, 2014

Facility Name:	Ultramar, Inc./ Olympic Tank Farm
Facility ID:	127749
SIC Code:	5171
Equipment Location:	1220 N. Alameda Street Wilmington, CA 90744-2847
Application #(s):	553907
Application Submittal Date(s):	07/02/2013
Revision Date:	TBD
Permit Section(s) Affected:	All
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all the rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. In the South Coast Air Basin, CO, NO₂, and SO₂ are in attainment with federal standards, PM-10 is in attainment at the federal level but remains nonattainment at the state level, and PM-2.5, ozone and lead (Los Angeles County) are nonattainment.

A Title V permit is proposed to be issued to cover the operations of Ultramar, Inc.-Olympic Tank Farm located at 1220 N. Alameda Street, Wilmington, CA 90744. This facility is subject to Title V requirements because of its potential as a major source of VOC emissions.

2. Facility Description

This is an existing facility that is applying for a Title V permit renewal. This is a bulk storage and distribution terminal that is currently not operating. Petroleum products can be stored in a series of fixed roof storage tanks. Distribution of products is primarily by pipeline. The facility also has two tank truck loading/unloading racks, an internal combustion engine and two process heaters.

3. Construction and Permitting History

The facility came into operation in the 1940's under the LA Department of Water and Power. Numerous permits to construct and permits to operate have been issued to the facility. Since then there has been numerous permitting actions. In 2001, Ultramar, Inc. was granted change of operator permits for the petroleum storage portion of the facility. An initial Title V permit was issued to Ultramar, Inc. on January 26, 2009 and subsequent revisions were issued on March 3, 2010, and April 24, 2013.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. NESHAP requirements of 40 CFR Part 63 apply to certain equipment at the facility and the permit terms and conditions may be found in Sections D and J of the Title V permit.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable

Grain Loading Standards in the SIP (July 2001). The facility has no air pollution control equipment and thus the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 are not applicable.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

**Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2008**

Pollutant	Emissions (tons/year)
NO _x	0
CO	0
VOC	0
PM	0
SO _x	0

(Facility has not been in operation)

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period**

The Following TACs Were Reported	Emissions (lbs/yr)
None	0

(Facility has not been in operation)

Health Risk from Toxic Air Contaminants

This facility has been determined to be exempt from the Air Toxics Information and Assessment Act (AB2588) requirements.

8. Compliance History

As noted, the facility was constructed in the 1940's by the LADWP and has had District permits since 1980. The facility changed ownership to Ultramar, Inc. in 2001 and received a Title V permit January 26, 2009. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed, no Notices to Comply issued, and no Notices of Violation issued in the last two calendar years. The facility is currently in compliance with all applicable rules and regulations, but as noted, it has not been in operation for several years.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.

10. Comments

This renewal includes updating a number of items including emission limits on the facility's two process heaters, several rule tags including a reference to a NESHAP with conditions added to Section J, the rule table in Section K, and rules in appendix B.