

FEB 07 2011

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # C-1077**  
**Project # C-1103479**

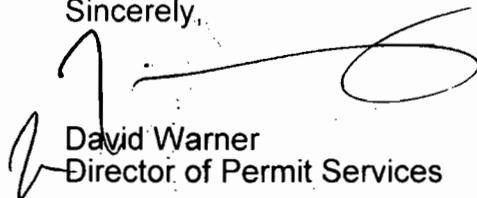
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. SFPP, L.P. is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct C-1077-49-3 into the Title V operating permit. The applicant proposes to replace one lane pump sleeve denatured ethanol unloading station with two lane skid mounted denatured ethanol unloading station and allow use of CARB Test Methods CP-204, TP-204.1, TP-204.2, and TP-204.3 for tanker truck vapor testing.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct C-1077-49-3, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



FEB 07 2011

Jim Giles  
SFPP, L.P.  
1100 Town & Country Road  
Orange, CA 92868

**Re: Notice of Minor Title V Permit Modification  
District Facility # C-1077  
Project # C-1103479**

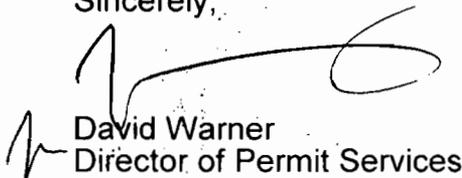
Dear Mr. Giles:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct C-1077-49-3 into the Title V operating permit. The applicant proposes to replace one lane pump sleeve denatured ethanol unloading station with two lane skid mounted denatured ethanol unloading station and allow use of CARB Test Methods CP-204, TP-204.1, TP-204.2, and TP-204.3 for tanker truck vapor testing.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct C-1077-49-3, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,

  
David Warner  
Director of Permit Services

Enclosures

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Tel: 661-392-5500 FAX: 661-392-5585

# **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: C-1103479

Engineer: Stanley Tom  
Date: January 31, 2011

Facility Number: C-1077  
Facility Name: SFPP, L.P.  
Mailing Address: 1100 Town & Country Road  
Orange, CA 92868

Contact Name: Jim Giles  
Phone: (707) 438-2120

Responsible Official: Jim Giles  
Title: Director of Operations

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## **I. PROPOSAL**

SFPP, L:P. is proposing a Title V minor permit modification to incorporate the recently issued ATC C-1077-49-3 into the Title V operating permit. The applicant proposes to replace one lane pump sleeve denatured ethanol unloading station with two lane skid mounted denatured ethanol unloading station and allow use of CARB Test Methods CP-204, TP-204.1, TP-204.2, and TP-204.3 for tanker truck vapor testing.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## **II. FACILITY LOCATION**

4149 S Maple Ave  
Fresno, CA 93725

### III. EQUIPMENT DESCRIPTION

**C-1077-49-4:** TWO-LANE DENATURED ETHANOL TRUCK UNLOADING STATION EACH LANE WITH TWO FLEXIBLE UNLOADING HOSES, TWO PUMPS, PRODUCT ACCUMULATOR, AIR ELIMINATOR, METER AND SUPPORT EQUIPMENT, AND ORGANIC VAPORS RETURNED TO DELIVERY TRUCKS FOR COLLECTION SERVING C-1077-5 AND C-1077-13

### IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

### V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Permit condition 1 was added to the proposed Permit to Operate to specify that the equipment must be maintained in good operating condition.

Permit condition 2 was added to the proposed Permit to Operate to ensure compliance with the visible emission limit.

Permit condition 3 was added to the proposed Permit to Operate to ensure vapor hoses are connected during unloading organic liquid.

Permit condition 5 was added to the proposed Permit to Operate to specify the pressure in the delivery tank.

Permit condition 6 was added to the proposed Permit to Operate to ensure there are no leaks or drainage at disconnections.

Permit condition 7 was added to the proposed Permit to Operate to specify the definition of a leak.

Permit condition 8 was added to the proposed Permit to Operate to specify the permit daily emission limit.

Permit condition 9 was added to the proposed Permit to Operate to specify the emission factors to use to calculate the fugitive emissions.

Permit condition 10 was added to the proposed Permit to Operate to specify the maximum throughput of denatured ethanol unloaded.

Permit condition 11 was added to the proposed Permit to Operate to specify the maximum volume of liquid spilled during disconnect.

Permit condition 12 was added to the proposed Permit to Operate to specify the recordkeeping requirements for fugitive components.

Permit condition 13 was added to the proposed Permit to Operate to specify the recordkeeping requirements for the amount of denatured ethanol unloaded.

## **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit No. C-1077-49-4
- B. Authority to Construct No. C-1077-49-3
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit No. C-1077-49-2

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(C-1077-49-4)

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-49-4

EXPIRATION DATE: 05/31/2008

## EQUIPMENT DESCRIPTION:

TWO-LANE DENATURED ETHANOL TRUCK UNLOADING STATION EACH LANE WITH TWO FLEXIBLE UNLOADING HOSES, TWO PUMPS, PRODUCT ACCUMULATOR, AIR ELIMINATOR, METER AND SUPPORT EQUIPMENT, AND ORGANIC VAPORS RETURNED TO DELIVERY TRUCKS FOR COLLECTION SERVING C-1077-5 AND C-1077-13

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. Vapor return hose(s) shall connect displaced vapors to the delivery truck or to tanks C-1077-5 or '13 whenever tank truck, trailer, or car is unloading organic liquid. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
4. All delivery trucks must be equipped with vapor collection equipment capable of undergoing a pressure change of no more than 1 inch of water within 5 minutes after it is pressured to 18 inches of water. This must be demonstrated annually for each truck using the procedures specified in EPA Method 27 of 40 CFR 60, Appendix A or CARB Test Methods CP-204, TP-204.1, TP204-2, and TP-204.3. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The vapor collection and control system shall operate such that the pressure in the delivery tank being unloaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum. [District Rule 4624] Federally Enforceable Through Title V Permit
6. The transfer rack and vapor collection equipment shall be designed, installed, maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections. [District Rule 4624] Federally Enforceable Through Title V Permit
7. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv as methane above a background when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 4624] Federally Enforceable Through Title V Permit
8. Fugitive VOC emissions from the denatured ethanol unloading system shall not exceed 0.20 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall maintain accurate component count for tank according to EPA's "Protocol for Equipment Leak Emission Estimate," Table 2-3, Marketing Terminal Average Emission Factors. Permittee shall update such records when new components are approved and installed. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The maximum throughput of denatured ethanol unloaded shall not exceed 427,350 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The maximum volume of liquid spilled during disconnect shall not exceed 10 milliliters. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Permittee shall maintain records of number and type of components installed and calculated fugitive emissions. Permittee shall update such records when new components are installed. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Daily records of amount of denatured ethanol unloaded at the denatured ethanol unloading system shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
14. Permittee shall maintain the following records for each truck: 1) the annual vapor collection equipment test result, 2) date the test was performed, and 3) truck identification. [District NSR Rule] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

# ATTACHMENT B

Authority to Construct No.  
(C-1077-49-3)



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

**AUTHORITY TO CONSTRUCT**

**PERMIT NO:** C-1077-49-3

**ISSUANCE DATE:** 07/27/2009

**LEGAL OWNER OR OPERATOR:** SFPP, L.P.  
**MAILING ADDRESS:** 1100 TOWN & COUNTRY ROAD  
ORANGE, CA 92868

**LOCATION:** 4149 S MAPLE AVE  
FRESNO, CA 93725

**EQUIPMENT DESCRIPTION:**  
MODIFICATION OF 10 HP ETHANOL TRUCK UNLOADING STATION WITH TWO FOUR-INCH FLEXIBLE UNLOADING HOSES AND ORGANIC VAPORS RETURNED TO DELIVERY TRUCKS FOR COLLECTION SERVING C-1077-5 AND C-1077-13: REPLACE ONE LANE PUMP SLEEVE DENATURED ETHANOL UNLOADING STATION WITH TWO LANE SKID MOUNTED DENATURED ETHANOL UNLOADING STATION AND ALLOW USE OF CARB TEST METHODS CP-204, TP-204.1, TP-204.2, AND TP-204.3 FOR TANKER TRUCK VAPOR TESTING

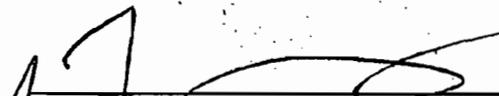
**CONDITIONS**

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Authority to Construct (ATC) C-1077-49-0 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
6. Vapor return hose(s) shall connect displaced vapors to the delivery truck or to tanks C-1077-5 or '13 whenever tank truck, trailer, or car is unloading organic liquid. [District Rules 2201 and 4624]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

  
**DAVID WARNER, Director of Permit Services**  
C-1077-49-3, Jul 27 2009 4:34PM - TOMS : Joint Inspection NOT Required

7. All delivery trucks must be equipped with vapor collection equipment capable of undergoing a pressure change of no more than 1 inch of water within 5 minutes after it is pressured to 18 inches of water. This must be demonstrated annually for each truck using the procedures specified in EPA Method 27 of 40 CFR 60, Appendix A or CARB Test Methods CP-204, TP-204.1, TP204-2, and TP-204.3. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The vapor collection and control system shall operate such that the pressure in the delivery tank being unloaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum. [District Rule 4624]
9. The transfer rack and vapor collection equipment shall be designed, installed, maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections. [District Rule 4624]
10. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv as methane above a background when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 4624]
11. Fugitive VOC emissions from the denatured ethanol unloading system shall not exceed 0.20 lb/day. [District Rule 2201]
12. Permittee shall maintain accurate component count for tank according to EPA's "Protocol for Equipment Leak Emission Estimate," Table 2-3, Marketing Terminal Average Emission Factors. Permittee shall update such records when new components are approved and installed. [District Rule 2201]
13. The maximum throughput of denatured ethanol unloaded shall not exceed 427,350 gallons per day. [District Rule 2201]
14. The maximum volume of liquid spilled during disconnect shall not exceed 10 milliliters. [District Rule 2201]
15. Permittee shall maintain records of number and type of components installed and calculated fugitive emissions. Permittee shall update such records when new components are installed. [District Rule 2201]
16. Daily records of amount of denatured ethanol unloaded at the denatured ethanol unloading system shall be maintained. [District Rules 1070 and 2201]
17. Permittee shall maintain the following records for each truck: 1) the annual vapor collection equipment test result, 2) date the test was performed, and 3) truck identification. [District NSR Rule] Federally Enforceable Through Title V Permit
18. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

# ATTACHMENT C

## Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-1077-49-3	0	36	0	0	0
<b>TOTAL</b>	<b>0</b>	<b>36</b>	<b>0</b>	<b>0</b>	<b>0</b>

# ATTACHMENT D

Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

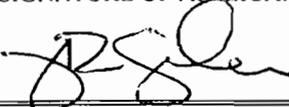
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NOV 16 2010

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

Permits Sec 5100  
SJVAPCD

1. PERMIT TO BE ISSUED TO: <u>SFPP L.P.</u>	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>1100 Town and Country Road</u>  CITY: <u>Orange</u> STATE: <u>CA</u> ZIP CODE: <u>92868</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>4149 Maple Drive</u> CITY: <u>Fresno</u>  SECTION <u>36</u> TOWNSHIP <u>14S</u> RANGE <u>20E</u>	INSTALLATION DATE:
4. GENERAL NATURE OF BUSINESS: <u>Petroleum Terminal for Hire</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  <u>Modification of Ethanol Unloading Rack to include an additional lane and skid-mounted unloading system ATC C-1077-49-3.</u>	
6. TYPE OR PRINT NAME OF APPLICANT:  <u>Jim Giles</u>	TITLE OF APPLICANT: <u>Director of Operations</u>
7. SIGNATURE OF APPLICANT:  	DATE: <u>11/15/10</u> PHONE: (707) 438-2120 FAX: (707) 424-9809 EMAIL:

### For APCD Use Only:

DATE STAMP <b>RECEIVED</b> NOV 17 2010 FINANCE SJVAPCD	FILING FEE RECEIVED: \$ <u>19.00</u> CHECK#: <u>967</u> DATE PAID: <u>11/15/10</u> PROJECT NO: <u>C-1103479</u> FACILITY ID: <u>C-1077</u>
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**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

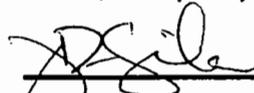
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: SFPP, L.P.	FACILITY ID: C 1077
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input checked="" type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: SFPP, L.P.	
3. Agent to the Owner:	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
\_\_\_\_\_  
Signature of Responsible Official

11/15/10  
\_\_\_\_\_  
Date

Jim Giles

\_\_\_\_\_  
Name of Responsible Official (please print)

Director of Operations

\_\_\_\_\_  
Title of Responsible Official (please print)

# ATTACHMENT E

Previous Title V Operating Permit No.  
C-1077-49-2

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1077-49-2

**EXPIRATION DATE:** 05/31/2008

**EQUIPMENT DESCRIPTION:**

10 HP ETHANOL TRUCK UNLOADING STATION WITH TWO FOUR-INCH FLEXIBLE UNLOADING HOSES AND ORGANIC VAPORS RETURNED TO DELIVERY TRUCKS FOR COLLECTION SERVING C-1077-5 AND C-1077-13

## PERMIT UNIT REQUIREMENTS

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1. Daily VOC emissions from this unloading station shall not exceed 0.1 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. All delivery trucks must be equipped with vapor collection equipment capable of undergoing a pressure change of no more than 1 inch of water within 5 minutes after it is pressured to 18 inches of water. This must be demonstrated annually for each truck using the procedures specified in EPA Method 27 of 40 CFR 60, Appendix A. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Permittee shall maintain the following records for each truck: 1) the annual vapor collection equipment test result, 2) date the test was performed, and 3) truck identification. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.