



MAY 13 2013

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

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # C-1077
Project # C-1110258**

Dear Mr. Giles:

The Air Pollution Control Officer has modified the Title V permit for SFPP, L.P. by incorporating C-1077-49-5. The applicant proposes to increase the number of fugitive components and fugitive VOC emissions for the unloading skids and associated equipment of an ethanol truck unloading station.

Enclosed is the modified Title V permit. The application and proposal were sent to US EPA Region IX on February 20, 2013. No comments were received following the District's preliminary decision on this project.

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

Sincerely,

David Warner
Director of Permit Services

DW:st

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



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Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Notice of Final Action - Minor Title V Permit Modification
District Facility # C-1077
Project # C-1110258**

Dear Mr. Rios:

The Air Pollution Control Officer has modified the Title V permit for SFPP, L.P. by incorporating C-1077-49-5. The applicant proposes to increase the number of fugitive components and fugitive VOC emissions for the unloading skids and associated equipment of an ethanol truck unloading station.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-49-7

EXPIRATION DATE: 05/31/2016

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

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 Rule 2201] 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 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 Rule 2201] 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. The operator shall inspect the vapor collection system, the vapor disposal system, and each transfer rack handling organic liquids for leaks during transfer at least once every calendar quarter using the EPA Method 21. [District Rule 4624] Federally Enforceable Through Title V Permit
9. All leaking components shall be repaired or replaced within 72 hours of discovery. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624] 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.

10. An operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection, the inspection frequency shall revert back to quarterly, and the operator shall contact the APCO in writing within 14 days. [District Rule 4624] Federally Enforceable Through Title V Permit
11. Fugitive component VOC emissions from the denatured ethanol unloading system shall not exceed 1.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
13. The maximum throughput of denatured ethanol unloaded shall not exceed 427,350 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The maximum volume of liquid spilled during disconnect shall not exceed 10 milliliters. [District Rule 2201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
16. Daily records of amount of denatured ethanol unloaded at the denatured ethanol unloading system shall be maintained. [District Rules 1070, 2201, 4624] Federally Enforceable Through Title V Permit
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 Rule 2201] Federally Enforceable Through Title V Permit
18. Operator shall maintain an inspection log containing the following 1) Type of component leaking; 2) Date and time of leak detection, and method of detection; 3) Date and time of leak repair, and emission level of recheck after leak is repaired; 4) Method used to minimize the leak to lowest possible level within 72 hours after detection. [District Rules 1070 and 4624] Federally Enforceable Through Title V Permit
19. 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

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