

TITLE V PERMIT ISSUANCE REPORT

Engineer: René Toledo
Company Name: Equilon Enterprises LLC dba Shell Oil Products US
Permit Number: F-00386-4
Date: January 9, 2012

Purpose:

The District has prepared this Title V Permit Issuance Report to document that Title V Permit F-00386-4 is being finalized to incorporate all of the proposed changes to the facility's current Title V Permit F-00386-3 (issued on July 23, 2010) resulting from the issuance of Authority to Construct (ATC) C-10-111. The project was considered a minor modification requiring a regulatory review from the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB), but not requiring a 30-day public noticing period.

As summarized in the "Addendum to Emission Evaluation for ATC C-10-111" (see attached), the District did not receive any comments from U.S. EPA and CARB during the noticing period.

Source Comments:

The proposed Title V Permit was reviewed by the source. They identified two typographical errors in proposed Title V Permit Conditions II.D1.13 and II.D3.4 (see attached). On December 20, 2011, the District received the source's written request to implement the proposed amendments of Title V Permit F-00386-4 (see attached).

EPA Comments:

The proposed Title V Permit was noticed according to the requirements of District Rule 3.8 (see file). The District did not receive any comments during the noticing periods.

ARB Comments:

The proposed Title V Permit was noticed according to the requirements of District Rule 3.8 (see file). The District did not receive any comments during the noticing periods.

Recommendation:

During the District's Permit to Operate (PTO) issuance inspection for P-44-74(a4), the District discovered a discrepancy between the number of pressure relief valves listed in the Control Equipment Inventory of ATC C-10-111 and the actual number of valves currently installed on the equipment. The revised Control Equipment Inventory for PTO P-44-74(a4) contained in the Title V Permit has been amended to read:

"Loading rack vapor recovery system with six (6) vapor recovery arms; one (1) pressure relief valve serving all three lanes; 158,760 gallon vapor holding tank; one (1) pressure relief valve serving the vapor holding tank; John Zink carbon adsorption vapor recovery unit (VRU), Model AA-825-8-10B; and continuous emission monitoring system (CEMS)"

Per District convention, PTO Condition 60 and Title V Condition II.D1.16 will be amended to remove the initial relative accuracy test audit (RATA) requirements and only require on-going testing every twelve (12) consecutive months.

As such, issue Title V Permit F-00386-4 with the above mentioned revision.

Engineer: Rene Toledo Date: 01/18/2012

Reviewed By: [Signature] Date: 1/19/2012

YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT

1947 Galileo Court, Suite 103, Davis, CA 95618

Addendum to Emission Evaluation

ATC # C-10-111
PTO # P-44-74(a3) (Reserved)
SIC Code # 5171

ENGINEER: Rene Toledo

COMPANY NAME: Equilon Enterprises LLC dba Shell Oil Products US

PROPOSAL: The purpose of this addendum is to address comments made during the regulatory noticing period.

EPA COMMENTS: The EPA comment period began on May 13, 2011 - when the District emailed Region IX Proposed Title V Permit F-00386-4. No comments were received from the EPA.

ARB COMMENTS: The ARB comment period began on May 13, 2011 - when the District emailed the Stationary Source Division received Proposed Title V Permit F-00386-4. No comments were received from the ARB.

PUBLIC COMMENTS: This was a minor Title V permit modification therefore there was no requirement for public comment period.

COMMENTS: The changes resulting from the public and regulatory notice periods are as follows:

1) The District corrected 2 typos . Condition D1.13 was changed to In the first sentence, the highlighted phrase should say **drift exceeds ±6 percent of the span value.** It was correct in the ATC, but not in the proposed Title V permit. And Condition D3.4 corrected the misspelled words to **thirty** and **sixty.** Again, the ATC was correct, but not the proposed Title V permit.

RECOMMENDATIONS Issue the Authority to Construct.

Engineer: ~~Nancy Fletcher~~ _____

Date: _____

Reviewed by: Susan K O'Leary

Date: 5/23/11

Susan McLaughlin

From: theresa.geijer@shell.com
Sent: Thursday, May 19, 2011 3:06 PM
To: Susan McLaughlin; don.herman@shell.com
Cc: MGRUBER@ALGCORP.COM
Subject: RE: ATC C-10-111 Loading Rack permit modification

Susan – reviewed and just noticed a few typos in the proposed Title V permit F-00386-4:

Condition D1.13:

D1.13 At minimum the Permit Holder shall adjust the zero (low-level) and high-level calibration drifts values whenever the twenty-four (24) hour zero (low-level) drift or ± 6 percent of the span value. The system shall allow the amount of excess zero (low-level) and high-level drift measured at the 24-hour interval checks to be recorded and quantified whenever specified.

In the first sentence, the highlighted phrase should say "...drift exceeds ± 6 percent of the span value." It is correct in the ATC, but not in the proposed Title V permit.

Condition D3.4:

D3.4 The District must be notified prior to any emissions testing event (source test or RATA), and a protocol must be submitted for approval at least thirty (30) days prior to any source test, or at least sixty days prior to any RATA. The results of an emissions testing event shall be submitted to the District within forty-five (45) days of the test date. The protocol and report shall be mailed to the attention of the Supervising Air Quality Engineer.

The highlighted words are misspelled and should be "thirty" and "sixty." Again, the ATC is OK, but not the proposed Title V permit.

Thanks, Theresa

From: Susan McLaughlin [mailto:smclaughlin@YSAQMD.org]
Sent: Wednesday, May 18, 2011 2:24 PM
To: Geijer, Theresa A SPLC-DSS/25; Herman, Don R SPLC-DSU/313
Cc: MGRUBER@ALGCORP.COM
Subject: RE: ATC C-10-111 Loading Rack permit modification

So sorry. This is why it's better for staff to do all these things. Rene would have known to convert the file from WordPerfect which is what we use, to a PDF or Word file, which is what everyone else in the world uses ☺ I'm resending the documents. Please tell me if you have trouble with this.

Thanks for the patience.

Sincerely,
Susan



Shell Oil Products US
Seattle Terminal
2555 13th Ave SW
Seattle, WA 98134

December 15, 2011

René Toledo
Yolo-Solano Air Quality Management District
1947 Galileo Ct., Suite 103
Davis, CA 95618

**Re: Equilon Enterprises LLC dba Shell Oil Products US
Sacramento Terminal (Title V Operating Permit #F-00386-3)
Request to Amend Title V Permit**

Dear Mr. Toledo:

Per our recent discussion, this letter is being sent to formally request that the above-referenced Title V permit be amended to reflect new equipment and conditions associated with the bladder tank bypass and Continuous Emissions Monitoring System.

Thank you for your assistance in this matter. Please call me if you have any questions at (206) 618-9061.

Sincerely,

A handwritten signature in black ink that reads "T.A. Geijer".

Theresa Geijer
Environmental Coordinator