



MAR 23 2010

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-1083654**

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. - Fresno Terminal is proposing a Title V minor permit modification to incorporate the recently issued ATC permits C-1077-5-6, '-13-5, '-18-3, '-23-3 and '-49-0 into the Title V operating permit. ATC permits C-1077-5-6 and '-13-5 will split the ethanol unloading rack off into its own permit (C-1077-49-0). Permit units '-5-6 and '-13-5 will reference '-49-0 as the delivery truck unloading rack and unloading hoses that serve the tanks. ATC permits C-1077-18-3 and '-23-3 will replace the current primary and secondary seals on two above ground gasoline storage tanks. The replacements will be a liquid mounted metallic shoe primary seal and a rim mounted secondary seal made of compression plates and a rubber wiper blade. Currently the ethanol vapors from loading losses are piped to the thermal oxidizer that serves the entire facility. The applicant is proposing to vent these vapors back into the ethanol delivery trucks instead. ATC permit C-1077-49-0 establishes the ethanol truck unloading rack as its own permit unit, and will reference permit units C-1077-5-6 and '-13-5 as the two tanks, which it serves.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC permits C-1077-5-6, '-13-5, '-18-3, '-23-3 and '-49-0, 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.

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
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Southern Region

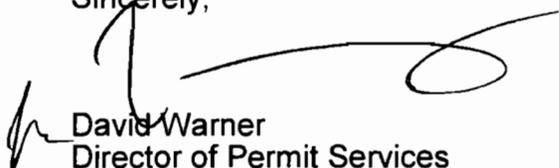
34946 Flyover Court
Bakersfield, CA 93308-9725

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

Mr. Gerardo C. Rios
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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



MAR 23 2010

Greg Lies
SFPP, L.P. - Fresno Terminal
4149 S. Maple
Fresno, CA 93725

**Re: Notice of Minor Title V Permit Modification
District Facility # C-1077
Project # C-1083654**

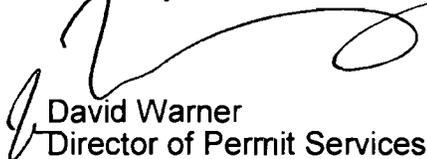
Dear Mr. Lies:

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 ATC permits C-1077-5-6, '-13-5, '-18-3, '-23-3 and '-49-0 into the Title V operating permit. ATC permits C-1077-5-6 and '-13-5 will split the ethanol unloading rack off into its own permit (C-1077-49-0). Permit units '-5-6 and '-13-5 will reference '-49-0 as the delivery truck unloading rack and unloading hoses that serve the tanks. ATC permits C-1077-18-3 and '-23-3 will replace the current primary and secondary seals on two above ground gasoline storage tanks. The replacements will be a liquid mounted metallic shoe primary seal and a rim mounted secondary seal made of compression plates and a rubber wiper blade. Currently the ethanol vapors from loading losses are piped to the thermal oxidizer that serves the entire facility. The applicant is proposing to vent these vapors back into the ethanol delivery trucks instead. ATC permit C-1077-49-0 establishes the ethanol truck unloading rack as its own permit unit, and will reference permit units C-1077-5-6 and '-13-5 as the two tanks, which it serves.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC permits C-1077-5-6, '-13-5, '-18-3, '-23-3 and '-49-0, 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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Executive Director/Air Pollution Control Officer

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: 1083654

Engineer: John Yoshimura
Date: 2/22/10

Facility Number: C-1077
Facility Name: SFPP, L.P.-Fresno Terminal
Mailing Address: 4149 S. Maple Ave.
Fresno, CA

Contact Name: Gregg A. Lies
Phone: (707) 580-5751

Responsible Official: Gregg A. Lies
Title: Director of Operations

I. PROPOSAL

SFPP, L.P.-Fresno Terminal is proposing a Title V minor permit modification to incorporate the recently issued C-1077-5-6, '-13-5, '-18-3, '-23-3, '-49-0 ATC's into the Title V operating permit.

C-1077-5-6, '-13-5:

ATC permits C-1077-5-6 and '-13-5 will split the ethanol unloading rack off into its own permit (C-1077-49-0). Permit units '-5-6 and '-13-5 will reference '-49-0 as the delivery truck unloading rack and unloading hoses that serve the tanks. The facility is proposing no other changes to permit units '-5-6 and '-13-5.

C-1077-18-3, '-23-3:

ATC permits C-1077-18-3 and '-23-3 will replace the current primary and secondary seals on two above ground gasoline storage tanks. The replacements will be a liquid mounted metallic shoe primary seal and a rim mounted secondary seal made of compression plates and a rubber wiper blade. The facility is proposing no other changes to permit units '-18-3 and '-23-3.

C-1077-49-0:

Currently the ethanol vapors from loading losses are piped to the thermal oxidizer that serves the entire facility. The applicant is proposing to vent these vapors back into the ethanol delivery trucks instead. ATC permit C-1077-49-0 establishes the ethanol truck unloading rack as its own permit unit, and will reference permit units C-1077-5-6 and '-13-5 as the two tanks, which it serves.

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

Liquid Petroleum Product Storage is located at 4149 Maple Drive, Fresno, CA.

III. EQUIPMENT DESCRIPTION

Current PTO's:

C-1077-5-3: 762,500 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-2 EQUIPPED WITH DOMED EXTERNAL FLOATING ROOF WITH AN HMT, INC. RIM-MOUNTED SEAL MADE OF STEEL COMPRESSION PLATES AND RUBBER WIPER TIP AND ETHANOL TRUCK UNLOADING STATION WITH TWO FOUR-INCH FLEXIBLE UNLOADING HOSES

C-1077-13-3: 634,000 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE, DIESEL, JET FUEL, & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-10 EQUIPPED WITH APPROVED PRIMARY AND SECONDARY SEALS

C-1077-18-2: 1,470,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-16, INTERNAL FLOATING ROOF EQUIPPED WITH PDM'S DELTA PRIMARY SEAL AND WIPER TYPE SECONDARY SEAL

C-1077-23-2: 2,520,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-21, INTERNAL FLOATING ROOF EQUIPPED WITH URETHANE FABRIC "RESILIENT TOROIDAL SEAL" WITH WOVEN NYLON INSERT, AND "FOAM LOGS" INSERTED BETWEEN TANK SHELL AND PAN RIM

ATC Description:

- C-1077-5-6:** MODIFICATION OF 762,500 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-2 EQUIPPED WITH DOMED EXTERNAL FLOATING ROOF WITH AN HMT, INC. RIM-MOUNTED SEAL MADE OF STEEL COMPRESSION PLATES AND RUBBER WIPER TIP AND ETHANOL TRUCK UNLOADING STATION WITH TWO FOUR-INCH FLEXIBLE UNLOADING HOSES: MODIFY VAPOR LINES TO ALLOW ETHANOL VAPORS TO BE RETURNED TO AND COLLECTED BY ETHANOL DELIVERY TRUCKS; SPLIT ETHANOL UNLOADING RACK OFF INTO ITS OWN PERMIT (C-1077-49-0)
- C-1077-13-5:** MODIFICATION OF 634,000 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE, DIESEL, JET FUEL, & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-10 EQUIPPED WITH APPROVED PRIMARY AND SECONDARY SEALS: MODIFY VAPOR LINES TO ALLOW ETHANOL VAPORS TO BE RETURNED TO AND COLLECTED BY ETHANOL DELIVERY TRUCKS; SPLIT ETHANOL UNLOADING RACK OFF INTO ITS OWN PERMIT (C-1077-49-0)
- C-1077-18-3:** MODIFICATION OF 1,470,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-16, INTERNAL FLOATING ROOF EQUIPPED WITH PDM'S DELTA PRIMARY SEAL AND WIPER TYPE SECONDARY SEAL: REPLACE PRIMARY AND SECONDARY SEAL WITH LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM MOUNTED SECONDARY SEAL MADE OF COMPRESSION PLATES AND A RUBBER WIPER BLADE
- C-1077-23-3:** MODIFICATION OF 2,520,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-21, INTERNAL FLOATING ROOF EQUIPPED WITH URETHANE FABRIC "RESILIENT TOROIDAL SEAL" WITH WOVEN NYLON INSERT, AND "FOAM LOGS" INSERTED BETWEEN TANK SHELL AND PAN RIM: REPLACE PRIMARY AND SECONDARY SEAL WITH LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM MOUNTED SECONDARY SEAL MADE OF COMPRESSION PLATES AND A RUBBER WIPER BLADE

C-1077-49-0: 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

Proposed PTO's:

C-1077-5-9: 762,500 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-2 EQUIPPED WITH DOMED EXTERNAL FLOATING ROOF WITH AN HMT, INC. RIM-MOUNTED SEAL MADE OF STEEL COMPRESSION PLATES AND RUBBER WIPER TIP SERVED BY ETHANOL UNLOADING RACK (C-1077-49-0)

C-1077-13-9: 634,000 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE, DIESEL, JET FUEL, & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-10 EQUIPPED WITH APPROVED PRIMARY AND SECONDARY SEALS SERVED BY ETHANOL UNLOADING RACK (C-1077-49-0)

C-1077-18-5: 1,470,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-16, INTERNAL FLOATING ROOF EQUIPPED WITH LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM MOUNTED SECONDARY SEAL MADE OF COMPRESSION PLATES AND A RUBBER WIPER BLADE

C-1077-23-5: 2,520,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-21, INTERNAL FLOATING ROOF EQUIPPED WITH LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM MOUNTED SECONDARY SEAL MADE OF COMPRESSION PLATES AND A RUBBER WIPER BLADE

C-1077-49-2: 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

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

SFPP, L.P. is proposing to modify the vapor lines (C-1077-5 and '-13) to allow ethanol vapors to be returned to and collected by ethanol delivery trucks, split the ethanol unloading rack off into its own permit (C-1077-49-0) and to replace the primary and secondary seals for PTOs C-1077-18 and '-23.

C-1077-5-9:

Permit condition 1 on the current Permit to Operate (PTO) '-5-3 was not included because of redundancy as conditions on the proposed PTO '-5-9 represent the necessary requirements of the condition.

Permit conditions 2 through 5 of the current PTO '-5-3 are represented by conditions 1 through 4 of the proposed PTO '-5-9.

Permit condition 6 of the current PTO '-5-3 was added to the proposed PTO '-5-9, as permit condition 6, to set an annual inspection of the floating roof seals or floating roof cover.

Permit condition 7 of the current PTO '-5-3 is represented by condition 8 of the proposed PTO '-5-9.

Permit condition 8 on the current PTO '-5-3 was not included because the rule is no longer applicable due to tank size and pressure requirements as shown in Rule 4623, 5.1.1. Table 1.

Permit conditions 9 through 15 on the current PTO '-5-3 are represented by conditions 9 through 15 of the proposed PTO '-5-9.

Permit condition 16 on the current PTO '-5-3 was deleted due to an outdated rule reference. Condition 16 of the proposed PTO '-5-9 was added to update the rule reference.

Permit conditions 17 through 19 on the current PTO '-5-3 are represented by conditions 17 through 19 of the proposed PTO '-5-9.

Permit condition 20 on the current PTO '-5-3 was deleted due to an outdated rule reference. Condition 20 of the proposed PTO '-5-9 was added to update the Rule reference.

Permit conditions 21 through 27 on the current PTO '-5-3 are represented by conditions 22 through 28 of the proposed PTO '-5-9.

Permit condition 28 on the current PTO '-5-3 was deleted due to an outdate rule reference. Condition 29 of the proposed PTO '-5-9 was added to update the rule reference.

Permit conditions 29 through 33 on the current PTO '-5-3 are represented by conditions 30 through 34 of the proposed PTO '-5-9.

Permit condition 34 on the current PTO '-5-3 was deleted due to an outdated rule reference. Conditions 35 and 36 of the proposed PTO '-5-9 were added to update the rule reference.

Permit condition 5 of the proposed PTO '-5-9 was added to require the operator of floating roof tanks to submit a tank inspection plan to the District for approval.

Permit condition 7 of the proposed PTO '-5-9 was added to require a closure device for storage tanks.

Permit condition 21 of the proposed PTO '-5-9 was added to specify requirements for floating roof deck fittings.

C-1077-13-9:

Permit condition 1 on the current PTO '-13-3 was not included because of redundancy as conditions on the proposed PTO '-13-9 represent the necessary requirements of the condition

Permit conditions 2 and 3 of the current PTO '-13-3 are represented by conditions 1 and 2 of the proposed PTO '-13-9.

Permit condition 4 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 21 of the proposed PTO '-13-9 was added to update the rule reference.

Permit condition 5 on the current PTO '-13-3 was not included because this facility is not a small producer.

Permit condition 6 and 7 on the current PTO '-13-3 is represented by condition 3 and 4 of the proposed PTO '-13-9.

Permit condition 8 of the current PTO '-13-3 was not included because condition 33 of the proposed PTO '-13-9 supersedes the recordkeeping requirements stated.

Permit condition 9 of the current PTO '-13-3 was not included because this unit is not an uncontrolled fixed roof tank (District Rule 4623, 6.2).

Permit condition 10 of the current PTO '-13-3 was added to the proposed PTO '-13-9, as condition 7, to set an annual inspection of the floating roof seals or floating roof cover.

Permit condition 11 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 8 of the proposed PTO '-13-9 was added to update the rule reference.

Permit Condition 12 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 9 and 10 of the proposed PTO '-13-9 was added to update the rule reference.

Permit condition 13 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 11 of the proposed PTO '-13-9 was added to update the rule reference.

Permit condition 14 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 12 of the proposed PTO '-13-9 was added to update the rule reference.

Permit condition 15 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 13 of the proposed PTO '-13-9 was added to update the rule reference.

Permit condition 16 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 14 of the proposed PTO '-13-9 was added to update the rule reference.

Permit condition 17 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 16 of the proposed PTO '-13-9 was added to update the rule reference.

Permit condition 18 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 16 of the proposed PTO '-13-9 was added to update the rule reference.

Permit condition 19 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 15 of the proposed PTO '-13-9 was added to update the rule reference.

Permit condition 20 and 21 of the current PTO '-13-3 is represented by condition 17 and 18 of the proposed PTO '-13-9.

Permit condition 22 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 27 of the proposed PTO '-13-9 was added to update the rule reference.

Permit condition 23 of the current PTO '-13-3 was deleted due to an outdated rule reference. Condition 21 of the proposed PTO '-13-9 was added to update the rule reference.

Permit condition 5 of the proposed PTO '-13-9 was added to require the operator of floating roof tanks to submit a tank inspection plan to the District for approval.

Permit condition 6 of the proposed PTO '-13-9 was added to the proposed Permit to Operate '-13-9 to specify requirements for internal floating roof tanks.

Permit conditions 19 and 20 of the proposed PTO '-13-9 were added to the proposed Permit to Operate '-13-9 to outline requirements for slotted guidepoles.

Permit conditions 22-26, 28-31 of the proposed PTO '-13-9 were added to outline requirements for internal floating roof deck fittings.

Permit condition 32 of the proposed PTO '-13-9 was added to ensure that the permittee submits the inspection reports to the District.

Permit condition 34 of the proposed PTO '-13-9 was added to ensure that the permittee keeps records to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201.

C-1077-18-5:

Permit conditions 1 and 2 of the current PTO '18-2 are represented by conditions 1 and 2 on the proposed PTO '18-5.

Permit condition 3 of the current PTO '18-2 is represented by condition 6 on the proposed PTO '18-5.

Permit condition 4 of the current PTO '18-2 was deleted due to an outdated rule reference. Condition 7 of the proposed PTO '18-5 was added to update the rule reference.

Permit condition 5 of the current PTO '18-2 was deleted due to an outdated rule reference. Condition 8 of the proposed PTO '18-5 was added to update the rule reference.

Permit condition 6 of the current PTO '18-2 was deleted due to an outdated rule reference. Condition 9 of the proposed PTO '18-5 was added to update the rule reference.

Permit condition 7 of the current PTO '18-2 was deleted due to an outdated rule reference. Condition 10 of the proposed PTO '18-5 was added to update the rule reference.

Permit condition 8 of the current PTO '18-2 was deleted due to an outdated rule reference. Condition 11 of the proposed PTO '18-5 was added to update the rule reference.

Permit condition 9 of the current PTO '18-2 was deleted due to an outdated rule reference. Condition 12 of the proposed PTO '18-5 was added to update the rule reference.

Permit condition 10 of the current PTO '18-2 was deleted due to an outdated rule reference. Condition 13 of the proposed PTO '18-5 was added to update the rule reference.

Permit condition 11 of the current PTO '18-2 was deleted due to an outdated rule reference. Condition 14 of the proposed PTO '18-5 was added to update the rule reference.

Permit condition 12 of the current PTO '18-2 was deleted due to an outdated rule reference. Condition 15 of the proposed PTO '18-5 was added to update the rule reference.

Permit condition 13 of the current PTO '-18-2 was deleted due to an outdated rule reference. Condition 16 of the proposed PTO '-18-5 was added to update the rule reference.

Permit condition 14 of the current PTO '-18-2 was deleted due to an outdated rule reference. Condition 17 of the proposed PTO '-18-5 was added to update the rule reference.

Permit condition 15 of the current PTO '-18-2 was deleted due to an outdated Rule reference. Condition 5 of the proposed PTO '-18-5 was added to update the Rule reference.

Permit conditions 16 of the current PTO '-18-2 are represented by conditions 18 on the proposed PTO '-18-5.

Permit condition 17 of the current PTO '-18-2 was deleted due to an outdated rule reference. Condition 19 of the proposed PTO '-18-5 was added to update the rule reference.

Permit conditions 18-21 of the current PTO '-18-2 are represented by conditions 20-23 on the proposed PTO '-18-5.

Permit conditions 22-24 of the current PTO '-18-2 are represented by conditions 25-27 on the proposed PTO '-18-5.

Permit condition 25 on the current Permit to Operate '-18-2 was not included because this unit is not an uncontrolled fixed roof tank (District Rule 4623, 6.2).

Permit conditions 26 and 27 of the current PTO '-18-2 are represented by conditions 28 and 29 on the proposed PTO '-18-5.

Permit condition 28 of the current PTO '-18-2 was deleted due to an outdated rule reference. Condition 31 of the proposed PTO '-18-5 was added to update the rule reference.

Permit condition 29 of the current PTO '-18-2 is represented by condition 32 on the proposed PTO '-18-5.

Permit conditions 3, 4 and 30 of the proposed PTO '-18-5 were added to restrict the maximum daily emissions to enforce the applicability of BACT.

Permit condition 24 was added to the proposed Permit to Operate '-18-5 to specify the requirements that apply to floating roof tank inspections.

C-1077-23-5:

Permit condition 1 of the current PTO '23-2 is represented by condition 2 of the proposed PTO '23-5.

Permit condition 2 of the current PTO '23-2 was deleted due to an outdated rule reference. Permit conditions 7, 8, and 9 of the proposed PTO '23-5 were added to update the Rule reference.

Permit condition 3 of the current PTO '23-2 was deleted due to an outdated rule reference. Permit conditions 10 and 11 of the proposed PTO '23-5 were added to update the Rule reference.

Permit condition 4 of the current PTO '23-2 was deleted due to an outdated rule reference. Permit conditions 10 of the proposed PTO '23-5 were added to update the Rule reference.

Permit condition 5 of the current PTO '23-2 was deleted due to an outdated rule reference. Permit conditions 16 of the proposed PTO '23-5 were added to update the Rule reference.

Permit condition 6 of the current PTO '23-2 was deleted due to an outdated rule reference. Permit conditions 15 of the proposed PTO '23-5 were added to update the Rule reference.

Permit condition 7 of the current PTO '23-2 was deleted due to an outdated rule reference. Permit conditions 17 of the proposed PTO '23-5 were added to update the Rule reference.

Permit condition 8 of the current PTO '23-2 was deleted due to an outdated rule reference. Permit conditions 5 of the proposed PTO '23-5 were added to update the Rule reference.

Condition 9 of the current PTO '23-2 was not included because of redundancy as the proposed PTO '23-5 contains applicable Rule 4623 provisions.

Permit condition 10 of the current PTO '23-2 is represented by condition 33 of the proposed PTO '23-5.

Permit condition 11 of the current PTO '23-2 was not included because condition 31 of the proposed PTO '23-5 supersedes the recordkeeping requirements stated.

Permit condition 12 of the current PTO '-23-2 was deleted due to an outdated rule reference. Permit conditions 6 of the proposed PTO '-23-5 were added to update the Rule reference.

Permit condition 13 of the current PTO '-23-2 was not included because the proposed PTO '-23-5 notes the addition of a mechanical shoe seal (liquid mounted metallic shoe primary seal) in the equipment description.

Permit condition 14-19 of the current PTO '-23-2 is represented by condition 18-23 of the proposed PTO '-23-5.

Permit condition 20 of the current PTO '-23-2 is represented by condition 34 of the proposed PTO '-23-5.

Permit condition 21 of the current PTO '-23-2 is represented by condition 26 of the proposed PTO '-23-5.

Permit condition 22 of the current PTO '-23-2 is represented by condition 25 of the proposed PTO '-23-5.

Permit condition 23 of the current PTO '-23-2 is represented by condition 35 of the proposed PTO '-23-5.

Permit condition 24 of the current PTO '-23-2 is represented by condition 27 of the proposed PTO '-23-5.

Permit condition 25 of the current Permit to Operate '-23-2 was not included because this unit is not an uncontrolled fixed roof tank (District Rule 4623, 6.2).

Permit condition 26 of the current PTO '-23-2 was not included because condition 28 of the proposed PTO '-23-5 supersedes the inspection recordkeeping requirements stated.

Permit condition 27 of the current PTO '-23-2 is represented by condition 31 of the proposed PTO '-23-5.

Permit condition 28 of the current Permit to Operate '-23-2 was not included because this facility is not a small producer.

Permit condition 29 of the current PTO '-23-2 is represented by condition 32 of the proposed PTO '-23-5.

Permit conditions 30-35 of the current PTO '-23-2 are represented by conditions 36-41 of the proposed PTO '-23-5.

Permit condition 1 of the proposed PTO '-23-5 was added to set an annual inspection of the floating roof seals or floating roof cover.

Permit conditions 3, 4, 29 and 30 were added to the proposed PTO '-23-5 to restrict the maximum daily emissions to enforce the applicability of BACT.

Permit conditions 12, 13 and 14 were added to the proposed PTO '-23-5 to provide specifications for metallic shoe-type seals used in internal floating roof tanks.

Permit condition 24 was added to the proposed PTO '-23-5 to specify the requirements that apply to floating roof tank inspections.

C-1077-49-0:

Permit conditions 1 through 4 on the ATC '-49-0 are represented by conditions 1 through 4 on the proposed Permit to Operate '-49-2.

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-1077-5-9, C-1077-13-9, C-1077-18-5, C-1077-23-5, C-1077-49-2
- B. Authorities to Construct No. C-1077-5-6, C-1077-13-5, C-1077-18-3, C-1077-23-3, C-1077-49-0
- C. Emissions Increases
- D. Previous Title V Operating Permit No.'s C-1077-5-3, C-1077-13-3, C-1077-18-2, C-1077-23-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-5-9

EXPIRATION DATE: 05/31/2008

EQUIPMENT DESCRIPTION:

762,500 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-2 EQUIPPED WITH DOMED EXTERNAL FLOATING ROOF WITH AN HMT, INC. RIM-MOUNTED SEAL MADE OF STEEL COMPRESSION PLATES AND RUBBER WIPER TIP SERVED BY ETHANOL UNLOADING RACK (C-1077-49-0)

PERMIT UNIT REQUIREMENTS

1. The only organic liquids approved for storage in the external floating roof tank shall be gasoline and ethanol. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The true vapor pressure (TVP) of liquids stored in the external floating roof tank shall be less than 11 psia under storage conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The total annual organic liquid throughput for Tank FR-2 shall not exceed 6,626,575 barrels per year. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Daily VOC emissions shall not exceed 5.4 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Operators of floating roof tanks shall submit a tank inspection plan to the APCO for approval. The plan shall include an inventory of the tanks subject to this rule and a tank inspection schedule. A copy of the operator's tank safety procedures shall be made available to the APCO upon request. The tank inventory shall include tank's identification number, PTO number, maximum tank capacity, dimensions of tank (height and diameter), organic liquid stored, type of primary and secondary seal, type of floating roof (internal or external floating roof), construction date of tank, and location of tank. Any revision to a previously approved tank inspection schedule shall be submitted to the APCO for approval prior to conducting an inspection. [District Rule 4623] Federally Enforceable Through Title V Permit
6. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. This tank shall be equipped with a closure device between the tank shell and roof edge consisting of two seals mounted one above the other; the one below shall be referred to as the primary seal, and the one above shall be referred as the secondary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
8. The external floating roof shall float on the surface of the stored liquid at all times (i.e., off the roof leg supports) except during the initial fill until the roof is lifted off the leg supports and when the tank is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five calendar days prior to performing the work. The tank must be in compliance with this rule before it may land on its legs. [District Rule 4623]
9. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623] 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.

11. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
12. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
13. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The cumulative length of all gaps between the tank shell and the secondary seal, greater than 1/8 inch shall not exceed 5% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
15. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 24 inches above the stored liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
16. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623] Federally Enforceable Through Title V Permit
17. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
18. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
19. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
20. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623] Federally Enforceable Through Title V Permit
21. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
22. Except for automatic bleeder vents, rim vents, and pressure relief vents, each opening in a non-contact external floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
23. Except for automatic bleeder vents and rim vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times (i.e., no visible gap) except when in actual use. [District Rule 4623] Federally Enforceable Through Title V Permit
24. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623] Federally Enforceable Through Title V Permit
25. Rim vents shall be equipped with a gasket and shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. [District Rule 4623] 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.

26. Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. The fabric cover must be impermeable if the liquid is drained into the contents of the tanks. [District Rule 4623] Federally Enforceable Through Title V Permit
27. External floating roof legs shall be equipped with vapor socks or vapor barriers in order to maintain a gas-tight condition so as to prevent VOC emissions from escaping through the roof leg opening. [District Rule 4623] Federally Enforceable Through Title V Permit
28. All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
29. The slotted guidepole well on a external floating roof shall be equipped with the following: a sliding cover, a well gasket, a pole sleeve, a pole wiper, and an internal float and float wiper designed to minimize the gap between the float and the well, and provided the gap shall not exceed 1/8 inch; or shall be equipped with a well gasket, a zero gap pole wiper seal and a pole sleeve that projects below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
30. The gap between the pole wiper and the slotted guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed 1/8 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
31. The permittee of external floating roof tanks shall make the primary seal envelope available for unobstructed inspection by the APCO on an annual basis at locations selected along its circumference at random by the APCO. In the case of riveted tanks with toroid-type seals, a minimum of eight locations shall be made available; in all other cases, a minimum of four locations shall be made available. If the APCO suspects a violation may exist the APCO may require such further unobstructed inspection of the primary seal as may be necessary to determine the seal condition for its entire circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
32. The permittee shall inspect all floating tanks at least once every 12 months to determine compliance with the requirements of this rule. The actual gap measurements of the floating roof primary and secondary seals shall be recorded. The inspection results shall be submitted to the APCO as specified in Section 6.3.5. [District Rule 4623] Federally Enforceable Through Title V Permit
33. The permittee shall inspect the primary and secondary seals for compliance with the requirements of this rule every time a tank is emptied or degassed. Actual gap measurements shall be performed when the liquid level is static but not more than 24 hours after the tank roof is re-floated. [District Rule 4623] Federally Enforceable Through Title V Permit
34. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
35. Permittee shall maintain the records of the external floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
36. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-13-9

EXPIRATION DATE: 05/31/2008

EQUIPMENT DESCRIPTION:

634,000 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE, DIESEL, JET FUEL, & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-10 EQUIPPED WITH APPROVED PRIMARY AND SECONDARY SEALS SERVED BY ETHANOL UNLOADING RACK (C-1077-49-0)

PERMIT UNIT REQUIREMENTS

1. The only organic liquids approved for storage in the internal floating roof tank shall be gasoline, diesel, jet fuel, and ethanol. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The total annual organic liquid throughput for Tank FR-10 shall not exceed 4,737,700 barrels per year. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Daily VOC emissions shall not exceed 5.4 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Operators of floating roof tanks shall submit a tank inspection plan to the APCO for approval. The plan shall include an inventory of the tanks subject to this rule and a tank inspection schedule. A copy of the operator's tank safety procedures shall be made available to the APCO upon request. The tank inventory shall include tank's identification number, PTO number, maximum tank capacity, dimensions of tank (height and diameter), organic liquid stored, type of primary and secondary seal, type of floating roof (internal or external floating roof), construction date of tank, and location of tank. Any revision to a previously approved tank inspection schedule shall be submitted to the APCO for approval prior to conducting an inspection. [District Rule 4623] Federally Enforceable Through Title V Permit
6. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on it's legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623] Federally Enforceable Through Title V Permit
7. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
9. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623] 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.

11. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
12. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
13. The cumulative length of all gaps between the tank shell and the secondary seal, greater than 1/8 inch shall not exceed 5% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
15. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623] Federally Enforceable Through Title V Permit
16. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
17. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
18. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
19. All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
20. The gap between the pole wiper and the slotted guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed 1/8 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
21. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623] Federally Enforceable Through Title V Permit
22. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
23. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
24. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623] Federally Enforceable Through Title V Permit
25. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623] 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.

26. Rim vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623] Federally Enforceable Through Title V Permit
27. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623] Federally Enforceable Through Title V Permit
28. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. The fabric sleeve must be impermeable. [District Rule 4623] Federally Enforceable Through Title V Permit
29. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
30. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623] Federally Enforceable Through Title V Permit
31. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623] Federally Enforceable Through Title V Permit
32. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
33. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
34. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-18-5

EXPIRATION DATE: 05/31/2008

EQUIPMENT DESCRIPTION:

1,470,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-16, INTERNAL FLOATING ROOF EQUIPPED WITH LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM MOUNTED SECONDARY SEAL MADE OF COMPRESSION PLATES AND A RUBBER WIPER BLADE

PERMIT UNIT REQUIREMENTS

1. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
2. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
3. The total annual gasoline throughput for Tank FR-16 shall not exceed 17,520,000 barrels. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Daily VOC emissions shall not exceed 16.6 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623 5.1.3] Federally Enforceable Through Title V Permit
6. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623, 5.4 and 5.3.1.3] Federally Enforceable Through Title V Permit
7. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
8. The cumulative length of all gaps, between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
9. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
10. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623, 5.4 and 5.3.2.1.1] 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.

11. Cumulative length of all gaps between the tank shell and secondary seal greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference for all seal types. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
12. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623, 5.4 and 5.3.2.1.3] Federally Enforceable Through Title V Permit
13. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623, 5.4 and 5.3.2.1.4] Federally Enforceable Through Title V Permit
14. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623, 5.4 and 5.3.2.1.5] Federally Enforceable Through Title V Permit
15. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623, 5.4 and 5.3.2.1.6] Federally Enforceable Through Title V Permit
16. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623, 5.4 and 5.3.2.1.7] Federally Enforceable Through Title V Permit
17. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623, 5.5.1] Federally Enforceable Through Title V Permit
18. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.1.1] Federally Enforceable Through Title V Permit
19. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623, 5.5.2.1.2] Federally Enforceable Through Title V Permit
20. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.1.3] Federally Enforceable Through Title V Permit
21. Rim vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623, 5.5.2.1.4] Federally Enforceable Through Title V Permit
22. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623, 5.5.2.1.5] Federally Enforceable Through Title V Permit
23. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. The fabric sleeve must be impermeable. [District Rule 4623, 5.5.2.1.6] 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.

24. Permittee shall submit a tank inspection plan to the APCO for approval. The plan shall include an inventory of the tanks subject to this rule and a tank inspection schedule. A copy of the operator's tank safety procedures shall be made available to the APCO upon request. The tank inventory shall include tank's identification number, PTO number, maximum tank capacity, dimensions of tank (height and diameter), organic liquid stored, type of primary and secondary seal, type of floating roof (internal or external floating roof), construction date of tank, and location of tank. Any revision to a previously approved tank inspection schedule shall be submitted to the APCO for approval prior to conducting an inspection. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
25. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 6.1] Federally Enforceable Through Title V Permit
26. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
27. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
28. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
29. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
30. Daily emissions will be determined based on using monthly throughput data and number of days per month. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
31. Records of monthly gasoline throughput and annual throughput based on a rolling 12-month basis shall be maintained. [District Rule District Rule 2520, 9.3 and District NSR Rule] Federally Enforceable Through Title V Permit
32. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-23-5

EXPIRATION DATE: 05/31/2008

EQUIPMENT DESCRIPTION:

2,520,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-21, INTERNAL FLOATING ROOF EQUIPPED WITH LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM MOUNTED SECONDARY SEAL MADE OF COMPRESSION PLATES AND A RUBBER WIPER BLADE

PERMIT UNIT REQUIREMENTS

1. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
2. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
3. The total annual gasoline throughput for Tank FR-21 shall not exceed 30,034,285 barrels. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Daily VOC emissions shall not exceed 25.4 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623 5.1.3] Federally Enforceable Through Title V Permit
6. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on it's legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623, 5.4 and 5.3.1.3] Federally Enforceable Through Title V Permit
7. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
8. The cumulative length of all gaps, between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
9. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
10. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623, 5.4 and 5.3.2.1.1] 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.

11. Cumulative length of all gaps between the tank shell and secondary seal greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference for all seal types. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
12. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623, 5.4 and 5.3.2.1.3] Federally Enforceable Through Title V Permit
13. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623, 5.4 and 5.3.2.1.4] Federally Enforceable Through Title V Permit
14. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623, 5.4 and 5.3.2.1.5] Federally Enforceable Through Title V Permit
15. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623, 5.4 and 5.3.2.1.6] Federally Enforceable Through Title V Permit
16. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623, 5.4 and 5.3.2.1.7] Federally Enforceable Through Title V Permit
17. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623, 5.5.1] Federally Enforceable Through Title V Permit
18. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.1.1, 40 CFR 60.112b(a)(1)(iii)] Federally Enforceable Through Title V Permit
19. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623, 5.5.2.1.1, 40 CFR 60.112b(a)(1)(iv)] Federally Enforceable Through Title V Permit
20. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.1.3 and 40 CFR 60.112b(a)(1)(v)] Federally Enforceable Through Title V Permit
21. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623, 5.5.2.1.4 and 40 CFR 60.112b(a)(1)(vi)] Federally Enforceable Through Title V Permit
22. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [District Rule 4623, 5.5.2.1.5 and 40 CFR 60.112b(a)(1)(vii)] Federally Enforceable Through Title V Permit
23. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [District Rule 4623, 5.5.2.1.6 and 40 CFR 60.112b(a)(1)(viii)] 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.

24. Permittee shall submit a tank inspection plan to the APCO for approval. The plan shall include an inventory of the tanks subject to this rule and a tank inspection schedule. A copy of the operator's tank safety procedures shall be made available to the APCO upon request. The tank inventory shall include tank's identification number, PTO number, maximum tank capacity, dimensions of tank (height and diameter), organic liquid stored, type of primary and secondary seal, type of floating roof (internal or external floating roof), construction date of tank, and location of tank. Any revision to a previously approved tank inspection schedule shall be submitted to the APCO for approval prior to conducting an inspection. [District Rule 4623, 6.1 and 40 CFR 60.113(b)(a)(3) and (4)] Federally Enforceable Through Title V Permit
25. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
26. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623, 6.1, 40 CFR 60.113(b)(a)(3) and (4)] Federally Enforceable Through Title V Permit
27. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
28. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
29. Daily emissions will be determined based on using monthly throughput data and number of days per month. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
30. Records of monthly gasoline throughput and annual throughput based on a rolling 12-month basis shall be maintained. [District Rule District Rule 2520, 9.3 and District NSR Rule] Federally Enforceable Through Title V Permit
31. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
32. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
33. The permittee shall comply with all applicable provisions of 40 CFR 60 Subpart Kb. [40 CFR 60 Subpart Kb] Federally Enforceable Through Title V Permit
34. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)] 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.

35. For this vessel which is equipped with a double seal system, inspections may be carried out as specified above, or using the following procedure every 5 years: Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals each time the vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other opening in the seal or the seal fabric, or the secondary seal has holes, tears, or other opening in the seal or seal fabric, or the gaskets no longer close off the liquid surfaces, or the slotted membrane has more than 10 percent open area, the operator shall make necessary repairs prior to filling the vessel. [40 CFR 60.113b(a)(3) and (4)] Federally Enforceable Through Title V Permit
36. The operator shall visually inspect the internal floating roof, the primary seal and the secondary seal prior to filling the storage vessel. If holes, tears, or other openings are found, they shall be repaired prior to filling. [40 CFR 60.113b(a)(1)] Federally Enforceable Through Title V Permit
37. Operator shall notify the APCO in writing 30 days prior to the filling or refilling of the vessel. If the inspection is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall make notification 7 days prior to refilling the tank. [40 CFR 60.113b(a)(5)] Federally Enforceable Through Title V Permit
38. Records of each inspection shall be maintained. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment. If any defects are detected during an inspection, operator shall provide the APCO with a report within 30 days of the inspection. The report shall identify the storage vessel, the nature of the defects, and the date the vessel was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a)(2), (3) and (4)] Federally Enforceable Through Title V Permit
39. The operator shall keep readily available accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The operator shall also keep a record of the liquid stored, the period of storage, and the maximum true vapor pressure of the liquid during the respective storage period. [40 CFR 60.116b(b) and (c)] Federally Enforceable Through Title V Permit
40. Available data on the storage temperature may be used to determine the maximum true vapor pressure. For vessels operated above or below ambient temperatures, the maximum true vapor pressure may be calculated using the highest expected calendar month average of the storage temperature. For vessels operated at ambient temperature, the maximum true vapor pressure may be calculated using maximum local monthly ambient temperatures as reported by the National Weather Service. [40 CFR 60.116b(e)(1)] Federally Enforceable Through Title V Permit
41. For crude oil or refined petroleum products the vapor pressure may be obtained by either: a) available data on the Reid vapor pressure and maximum expected storage temperature from nomographs contained in API Bulletin 2517, b) obtained from standard reference texts, c) determined by ASTM Method D2879-83, or c) measured or calculated by an appropriate method approved by the APCO. [40 CFR 60.116b(e)(2) and (3)] Federally Enforceable Through Title V Permit

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

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**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

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.

ATTACHMENT B

Authorities to Construct No.
(C-1077-5-6, '-13-5, '-18-3, '-23-3, '-49-0)



San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1077-5-6

ISSUANCE DATE: 11/14/2005

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 762,500 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-2 EQUIPPED WITH DOMED EXTERNAL FLOATING ROOF WITH AN HMT, INC. RIM-MOUNTED SEAL MADE OF STEEL COMPRESSION PLATES AND RUBBER WIPER TIP AND ETHANOL TRUCK UNLOADING STATION WITH TWO FOUR-INCH FLEXIBLE UNLOADING HOSES: MODIFY VAPOR LINES TO ALLOW ETHANOL VAPORS TO BE RETURNED TO AND COLLECTED BY ETHANOL DELIVERY TRUCKS; SPLIT ETHANOL UNLOADING RACK OFF INTO ITS OWN PERMIT (C-1077-49-0)

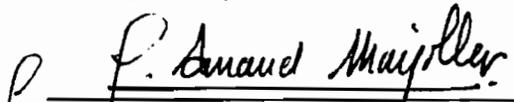
CONDITIONS

1. The only organic liquids approved for storage in the external floating roof tank shall be gasoline and ethanol. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The true vapor pressure (TVP) of liquids stored in the external floating roof tank shall be less than 11 psia under storage conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The total annual organic liquid throughput for Tank FR-2 shall not exceed 6,626,575 barrels per year. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Daily VOC emissions shall not exceed 5.4 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Operators of floating roof tanks shall submit a tank inspection plan to the APCO for approval. The plan shall include an inventory of the tanks subject to this rule and a tank inspection schedule. A copy of the operator's tank safety procedures shall be made available to the APCO upon request. The tank inventory shall include tank's identification number, PTO number, maximum tank capacity, dimensions of tank (height and diameter), organic liquid stored, type of primary and secondary seal, type of floating roof (internal or external floating roof), construction date of tank, and location of tank. Any revision to a previously approved tank inspection schedule shall be submitted to the APCO for approval prior to conducting an inspection. [District Rule 4323] Federally Enforceable Through Title V Permit

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.

DAVID L. CROW, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-1077-5-6, Nov 16 2006 11:10AM - THADC : Joint Inspection NOT Required

6. This tank shall be equipped with a closure device between the tank shell and roof edge consisting of two seals mounted one above the other; the one below shall be referred to as the primary seal, and the one above shall be referred as the secondary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
7. The external floating roof shall float on the surface of the stored liquid at all times (i.e., off the roof leg supports) except during the initial fill until the roof is lifted off the leg supports and when the tank is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five calendar days prior to performing the work. The tank must be in compliance with this rule before it may land on its legs. [District Rule 4623]
8. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
9. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
11. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
12. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
13. The cumulative length of all gaps between the tank shell and the secondary seal, greater than 1/8 inch shall not exceed 5% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 24 inches above the stored liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
15. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623] Federally Enforceable Through Title V Permit
16. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
17. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
18. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
19. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623] Federally Enforceable Through Title V Permit
20. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
21. Except for automatic bleeder vents, rim vents, and pressure relief vents, each opening in a non-contact external floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. Except for automatic bleeder vents and rim vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times (i.e., no visible gap) except when in actual use. [District Rule 4623] Federally Enforceable Through Title V Permit
23. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623] Federally Enforceable Through Title V Permit
24. Rim vents shall be equipped with a gasket and shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. [District Rule 4623] Federally Enforceable Through Title V Permit
25. Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. The fabric cover must be impermeable if the liquid is drained into the contents of the tanks. [District Rule 4623] Federally Enforceable Through Title V Permit
26. External floating roof legs shall be equipped with vapor socks or vapor barriers in order to maintain a gas-tight condition so as to prevent VOC emissions from escaping through the roof leg opening. [District Rule 4623] Federally Enforceable Through Title V Permit
27. All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
28. The slotted guidepole well on an external floating roof shall be equipped with the following: a sliding cover, a well gasket, a pole sleeve, a pole wiper, and an internal float and float wiper designed to minimize the gap between the float and the well, and provided the gap shall not exceed 1/8 inch; or shall be equipped with a well gasket, a zero gap pole wiper seal and a pole sleeve that projects below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
29. The gap between the pole wiper and the slotted guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed 1/8 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
30. The permittee of external floating roof tanks shall make the primary seal envelope available for unobstructed inspection by the APCO on an annual basis at locations selected along its circumference at random by the APCO. In the case of riveted tanks with toroid-type seals, a minimum of eight locations shall be made available; in all other cases, a minimum of four locations shall be made available. If the APCO suspects a violation may exist the APCO may require such further unobstructed inspection of the primary seal as may be necessary to determine the seal condition for its entire circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
31. The permittee shall inspect all floating tanks at least once every 12 months to determine compliance with the requirements of this rule. The actual gap measurements of the floating roof primary and secondary seals shall be recorded. The inspection results shall be submitted to the APCO as specified in Section 6.3.5. [District Rule 4623] Federally Enforceable Through Title V Permit
32. The permittee shall inspect the primary and secondary seals for compliance with the requirements of this rule every time a tank is emptied or degassed. Actual gap measurements shall be performed when the liquid level is static but not more than 24 hours after the tank roof is re-floated. [District Rule 4623] Federally Enforceable Through Title V Permit
33. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. Permittee shall maintain the records of the external floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
35. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit



San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1077-13-5

ISSUANCE DATE: 11/14/2005

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 634,000 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE, DIESEL, JET FUEL, & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-10 EQUIPPED WITH APPROVED PRIMARY AND SECONDARY SEALS; MODIFY VAPOR LINES TO ALLOW ETHANOL VAPORS TO BE RETURNED TO AND COLLECTED BY ETHANOL DELIVERY TRUCKS; SPLIT ETHANOL UNLOADING RACK OFF INTO ITS OWN PERMIT (C-1077-49-0)

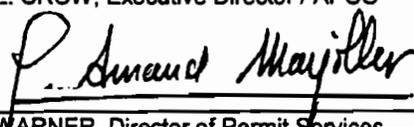
CONDITIONS

1. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The only organic liquids approved for storage in the internal floating roof tank shall be gasoline, diesel, jet fuel, and ethanol. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The total annual organic liquid throughput for Tank FR-10 shall not exceed 4,737,700 barrels per year. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily VOC emissions shall not exceed 5.4 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Operators of floating roof tanks shall submit a tank inspection plan to the APCO for approval. The plan shall include an inventory of the tanks subject to this rule and a tank inspection schedule. A copy of the operator's tank safety procedures shall be made available to the APCO upon request. The tank inventory shall include tank's identification number, PTO number, maximum tank capacity, dimensions of tank (height and diameter), organic liquid stored, type of primary and secondary seal, type of floating roof (internal or external floating roof), construction date of tank, and location of tank. Any revision to a previously approved tank inspection schedule shall be submitted to the APCO for approval prior to conducting an inspection. [District Rule 4623] Federally Enforceable Through Title V Permit

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.

DAVID L. CROW, Executive Director / APCO


DAVID WARNER, Director of Permit Services

C-1077-13-5; Nov 16 2005 11:10AM - THAOC : Joint Inspection NOT Required

7. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623] Federally Enforceable Through Title V Permit
8. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
9. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
11. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
12. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
13. The cumulative length of all gaps between the tank shell and the secondary seal, greater than 1/8 inch shall not exceed 5% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
15. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623] Federally Enforceable Through Title V Permit
16. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
17. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
18. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
19. All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
20. The gap between the pole wiper and the slotted guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed 1/8 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
21. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623] Federally Enforceable Through Title V Permit
22. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

23. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
24. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623] Federally Enforceable Through Title V Permit
25. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623] Federally Enforceable Through Title V Permit
26. Rim vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623] Federally Enforceable Through Title V Permit
27. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623] Federally Enforceable Through Title V Permit
28. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. The fabric sleeve must be impermeable. [District Rule 4623] Federally Enforceable Through Title V Permit
29. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
30. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623] Federally Enforceable Through Title V Permit
31. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623] Federally Enforceable Through Title V Permit
32. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
33. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
34. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1077-18-3

ISSUANCE DATE: 02/13/2007

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:

1,470,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-16, INTERNAL FLOATING ROOF EQUIPPED WITH PDM'S DELTA PRIMARY SEAL AND WIPER TYPE SECONDARY SEAL: REPLACE PRIMARY AND SECONDARY SEAL WITH LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM MOUNTED SECONDARY SEAL MADE OF COMPRESSION PLATES AND A RUBBER WIPER BLADE

CONDITIONS

1. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
2. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
3. The total annual gasoline throughput for Tank FR-16 shall not exceed 17,520,000 barrels. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Daily VOC emissions shall not exceed 16.6 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623 5.1.3] Federally Enforceable Through Title V Permit

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

for David Warner
 DAVID WARNER, Director of Permit Services

C-1077-18-3; Feb 13 2007 11:31AM - CONZAL.EV - Issue Inspection NOT Required

Conditions for C-1077-18-3 (continued)

Page 2 of 4

6. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623, 5.4 and 5.3.1.3] Federally Enforceable Through Title V Permit
7. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
8. The cumulative length of all gaps, between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
9. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
10. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
11. Cumulative length of all gaps between the tank shell and secondary seal greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference for all seal types. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
12. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623, 5.4 and 5.3.2.1.3] Federally Enforceable Through Title V Permit
13. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623, 5.4 and 5.3.2.1.4] Federally Enforceable Through Title V Permit
14. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623, 5.4 and 5.3.2.1.5] Federally Enforceable Through Title V Permit
15. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623, 5.4 and 5.3.2.1.6] Federally Enforceable Through Title V Permit
16. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623, 5.4 and 5.3.2.1.7] Federally Enforceable Through Title V Permit
17. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623, 5.5.1] Federally Enforceable Through Title V Permit
18. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.1.1] Federally Enforceable Through Title V Permit
19. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623, 5.5.2.1.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

Conditions for C-1077-18-3 (continued)

Page 3 of 4

20. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.1.3] Federally Enforceable Through Title V Permit
21. Rim vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623, 5.5.2.1.4] Federally Enforceable Through Title V Permit
22. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623, 5.5.2.1.5] Federally Enforceable Through Title V Permit
23. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. The fabric sleeve must be impermeable. [District Rule 4623, 5.5.2.1.6] Federally Enforceable Through Title V Permit
24. Permittee shall submit a tank inspection plan to the APCO for approval. The plan shall include an inventory of the tanks subject to this rule and a tank inspection schedule. A copy of the operator's tank safety procedures shall be made available to the APCO upon request. The tank inventory shall include tank's identification number, PTO number, maximum tank capacity, dimensions of tank (height and diameter), organic liquid stored, type of primary and secondary seal, type of floating roof (internal or external floating roof), construction date of tank, and location of tank. Any revision to a previously approved tank inspection schedule shall be submitted to the APCO for approval prior to conducting an inspection. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
25. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 6.1] Federally Enforceable Through Title V Permit
26. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
27. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
28. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
29. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
30. Daily emissions will be determined based on using monthly throughput data and number of days per month. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
31. Records of monthly gasoline throughput and annual throughput based on a rolling 12-month basis shall be maintained. [District Rule District Rule 2520, 9.3 and District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

Conditions for C-1077-18-3 (continued)

Page 4 of 4

32. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1077-23-3

ISSUANCE DATE: 02/13/2007

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:

2,520,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-21, INTERNAL FLOATING ROOF EQUIPPED WITH URETHANE FABRIC "RESILIENT TOROIDAL SEAL" WITH WOVEN NYLON INSERT, AND "FOAM LOGS" INSERTED BETWEEN TANK SHELL AND PAN RIM; REPLACE PRIMARY AND SECONDARY SEAL WITH LIQUID MOUNTED METALLIC SHOE PRIMARY SEAL AND A RIM MOUNTED SECONDARY SEAL MADE OF COMPRESSION PLATES AND A RUBBER WIPER BLADE

CONDITIONS

1. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
2. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
3. The total annual gasoline throughput for Tank FR-21 shall not exceed 30,034,285 barrels. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Daily VOC emissions shall not exceed 25.4 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623 5.1.3] Federally Enforceable Through Title V Permit

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-1077-23-3: Feb 13 2007 11:31AM - GONZALEZ : Joint Inspection NOT Required

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

Conditions for C-1077-23-3 (continued)

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6. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623, 5.4 and 5.3.1.3] Federally Enforceable Through Title V Permit
7. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
8. The cumulative length of all gaps, between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
9. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
10. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
11. Cumulative length of all gaps between the tank shell and secondary seal greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference for all seal types. [District Rule 4623, 5.4 and 5.3.2.1.1] Federally Enforceable Through Title V Permit
12. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623, 5.4 and 5.3.2.1.3] Federally Enforceable Through Title V Permit
13. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623, 5.4 and 5.3.2.1.4] Federally Enforceable Through Title V Permit
14. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623, 5.4 and 5.3.2.1.5] Federally Enforceable Through Title V Permit
15. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623, 5.4 and 5.3.2.1.6] Federally Enforceable Through Title V Permit
16. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623, 5.4 and 5.3.2.1.7] Federally Enforceable Through Title V Permit
17. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623, 5.5.1] Federally Enforceable Through Title V Permit
18. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.1.1, 40-CFR 60.112b(a)(1)(iii)] Federally Enforceable Through Title V Permit
19. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623, 5.5.2.1.1, 40 CFR 60.112b(a)(1)(iv)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

Conditions for C-1077-23-3 (continued)

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20. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.1.3 and 40 CFR 60.112b(a)(1)(v)] Federally Enforceable Through Title V Permit
21. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623, 5.5.2.1.4 and 40 CFR 60.112b(a)(1)(vi)] Federally Enforceable Through Title V Permit
22. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [District Rule 4623, 5.5.2.1.5 and 40 CFR 60.112b(a)(1)(vii)] Federally Enforceable Through Title V Permit
23. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [District Rule 4623, 5.5.2.1.6 and 40 CFR 60.112b(a)(1)(viii)] Federally Enforceable Through Title V Permit
24. Permittee shall submit a tank inspection plan to the APCO for approval. The plan shall include an inventory of the tanks subject to this rule and a tank inspection schedule. A copy of the operator's tank safety procedures shall be made available to the APCO upon request. The tank inventory shall include tank's identification number, PTO number, maximum tank capacity, dimensions of tank (height and diameter), organic liquid stored, type of primary and secondary seal, type of floating roof (internal or external floating roof), construction date of tank, and location of tank. Any revision to a previously approved tank inspection schedule shall be submitted to the APCO for approval prior to conducting an inspection. [District Rule 4623, 6.1 and 40 CFR 60.113(b)(a)(3) and (4)] Federally Enforceable Through Title V Permit
25. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
26. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623, 6.1, 40 CFR 60.113(b)(a)(3) and (4)] Federally Enforceable Through Title V Permit
27. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
28. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
29. Daily emissions will be determined based on using monthly throughput data and number of days per month. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
30. Records of monthly gasoline throughput and annual throughput based on a rolling 12-month basis shall be maintained. [District Rule 2520, 9.3 and District NSR Rule] Federally Enforceable Through Title V Permit
31. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

Conditions for C-1077-23-3 (continued)

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32. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
33. The permittee shall comply with all applicable provisions of 40 CFR 60 Subpart Kb. [40 CFR 60 Subpart Kb] Federally Enforceable Through Title V Permit
34. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)] Federally Enforceable Through Title V Permit
35. For this vessel which is equipped with a double seal system, inspections may be carried out as specified above, or using the following procedure every 5 years: Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals each time the vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other opening in the seal or the seal fabric, or the secondary seal has holes, tears, or other opening in the seal or seal fabric, or the gaskets no longer close off the liquid surfaces, or the slotted membrane has more than 10 percent open area, the operator shall make necessary repairs prior to filling the vessel. [40 CFR 60.113b(a)(3) and (4)] Federally Enforceable Through Title V Permit
36. The operator shall visually inspect the internal floating roof, the primary seal and the secondary seal prior to filling the storage vessel. If holes, tears, or other openings are found, they shall be repaired prior to filling. [40 CFR 60.113b(a)(1)] Federally Enforceable Through Title V Permit
37. Operator shall notify the APCO in writing 30 days prior to the filling or refilling of the vessel. If the inspection is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall make notification 7 days prior to refilling the tank. [40 CFR 60.113b(a)(5)] Federally Enforceable Through Title V Permit
38. Records of each inspection shall be maintained. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment. If any defects are detected during an inspection, operator shall provide the APCO with a report within 30 days of the inspection. The report shall identify the storage vessel, the nature of the defects, and the date the vessel was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a)(2), (3) and (4)] Federally Enforceable Through Title V Permit
39. The operator shall keep readily available accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The operator shall also keep a record of the liquid stored, the period of storage, and the maximum true vapor pressure of the liquid during the respective storage period. [40 CFR 60.116b(b) and (c)] Federally Enforceable Through Title V Permit
40. Available data on the storage temperature may be used to determine the maximum true vapor pressure. For vessels operated above or below ambient temperatures, the maximum true vapor pressure may be calculated using the highest expected calendar month average of the storage temperature. For vessels operated at ambient temperature, the maximum true vapor pressure may be calculated using maximum local monthly ambient temperatures as reported by the National Weather Service. [40 CFR 60.116b(e)(1)] Federally Enforceable Through Title V Permit
41. For crude oil or refined petroleum products the vapor pressure may be obtained by either: a) available data on the Reid vapor pressure and maximum expected storage temperature from nomographs contained in API Bulletin 2517, b) obtained from standard reference texts, c) determined by ASTM Method D2879-83, or c) measured or calculated by an appropriate method approved by the APCO. [40 CFR 60.116b(e)(2) and (3)] Federally Enforceable Through Title V Permit



San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1077-49-0

ISSUANCE DATE: 11/14/2005

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

LOCATION: 4149 S MAPLE AVE
FRESNO, CA 93725

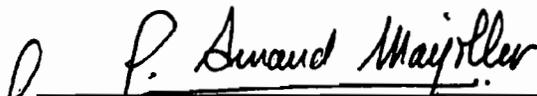
EQUIPMENT DESCRIPTION:
10 HP ETHANOL TRUCK UNLOADING STATION WITH TWO FOUR-INCH FLEXIBLE UNLOADING HOSES AND ORGANIC VAPORS RETURNED TO DELIVERY TRUCKS FOR COLLECTION SERVING C-1077-5 AND C-1077-13

CONDITIONS

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

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.

DAVID L. CROW, Executive Director / APCO


DAVID WARNER, Director of Permit Services
C-1077-49-0: Nov 18 2005 11:10AM - THAOC : Joint Inspection NOT Required

ATTACHMENT C

Emissions Increases

	SSPE1 (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-1077-5-3*	0	1,795	0	0	0
C-1077-13-3**	0	1,978	0	0	0
C-1077-18-2***	0	4,950	0	0	0
C-1077-23-2***	0	7,486	0	0	0
SSPE1 TOTAL	0	16,209	0	0	0

*Referenced from project C-1053341

**Referenced from project C-1000236

*** Referenced from project C-1063094

	SSPE2 (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-1077-5-6*	0	1,795	0	0	0
C-1077-13-5*	0	1,978	0	0	0
C-1077-18-3**	0	4,950	0	0	0
C-1077-23-3**	0	7,486	0	0	0
C-1077-49-0*	0	30	0	0	0
SSPE2 TOTAL	0	16,239	0	0	0

*Referenced from project C-1053341

** Referenced from project C-1063094

	SSIPE (lb/yr) [SSPE2-SSPE1]				
	NOx	VOC	CO	SOx	PM10
SSPE1	0	16,209	0	0	0
SSPE2	0	16,239	0	0	0
SSIPE TOTAL	0	30	0	0	0

ATTACHMENT D

Previous Title V Operating Permit No.'s
(C-1077-5-3, '-13-3, '-18-2, '-23-2)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-5-3

EXPIRATION DATE: 05/31/2008

EQUIPMENT DESCRIPTION:

762,500 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-2 EQUIPPED WITH DOMED EXTERNAL FLOATING ROOF WITH AN HMT, INC. RIM-MOUNTED SEAL MADE OF STEEL COMPRESSION PLATES AND RUBBER WIPER TIP AND ETHANOL TRUCK UNLOADING STATION WITH TWO FOUR-INCH FLEXIBLE UNLOADING HOSES

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The only organic liquids approved for storage in the external floating roof tank shall be gasoline and ethanol. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The true vapor pressure (TVP) of liquids stored in the external floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
4. The total annual organic liquid throughput for Tank FR-2 shall not exceed 6,626,575 barrels per year. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Daily VOC emissions shall not exceed 5.4 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. The external floating roof shall float on the surface of the stored liquid at all times (i.e., off the roof leg supports) except during the initial fill until the roof is lifted off the leg supports and when the tank is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the District in writing at least five calendar days prior to performing the work. [District Rule 4623] Federally Enforceable Through Title V Permit
8. The tank pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank. The PV relief valve shall be permanently labeled with the operating pressure settings. The PV relief valve shall be properly installed and maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in gas-tight condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
9. Gaps between the tank shell and the primary seal shall not exceed one and one-half (1-1/2) inches. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The cumulative length of all primary seal gaps greater than one-half (1/2) inch shall not exceed 10% of the circumference of the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
11. The cumulative length of all primary seal gaps greater than one-eighth (1/8) inch shall not exceed 30% of the circumference of the tank. [District Rule 4623] 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. No continuous gap greater than one-eighth (1/8) inch wide shall exceed 10% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
13. No gap between the tank shell and the secondary seal shall exceed one-half (1/2) inch. [District Rule 4623] Federally Enforceable Through Title V Permit
14. The cumulative length of all gaps between the tank shell and the secondary seal, greater than one-eighth (1/8) inch shall not exceed 5% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
15. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 24 inches above the stored liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
16. The maximum gap between the shoe and the tank shell shall be no greater than double the gap allowed by the seal gap criteria for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623] Federally Enforceable Through Title V Permit
17. There shall be no tears, holes or openings in the secondary seal or in the primary seal envelope surrounding the annular vapor space enclosed by the roof edge, stored liquid surface, shoe, and seal fabric. [District Rule 4623] Federally Enforceable Through Title V Permit
18. The secondary seal shall allow easy insertion of probes of up to one and one-half (1-1/2) inches in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
19. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
20. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623] Federally Enforceable Through Title V Permit
21. Except for automatic bleeder vents, rim vents, and pressure relief vents, each opening in a non-contact external floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
22. Except for automatic bleeder vents and rim vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times (i.e., no visible gap) except when in actual use. [District Rule 4623] Federally Enforceable Through Title V Permit
23. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623] Federally Enforceable Through Title V Permit
24. Rim vents shall be equipped with a gasket and shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. [District Rule 4623] Federally Enforceable Through Title V Permit
25. Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. The fabric cover must be impermeable if the liquid is drained into the contents of the tanks. [District Rule 4623] Federally Enforceable Through Title V Permit
26. External floating roof legs shall be equipped with vapor socks or vapor barriers in order to maintain a gas-tight condition so as to prevent VOC emissions from escaping through the roof leg opening. [District Rule 4623] Federally Enforceable Through Title V Permit
27. The well shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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28. The well on the external floating roof shall be equipped with the following: a sliding cover, a well gasket, a pole sleeve, a pole wiper, and an internal float and float wiper designed to minimize the gap between the float and the well provided the gap does not exceed one-eighth (1/8) inch; or shall be equipped with a well gasket, a zero gap pole wiper seal and a pole sleeve that projects below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
29. The gap between the pole wiper and the guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed one-eighth (1/8) inch. [District Rule 4623] Federally Enforceable Through Title V Permit
30. The permittee of external floating roof tanks shall make the primary seal envelope available for unobstructed inspection by the District on an annual basis at locations selected along its circumference at random by the District. In the case of riveted tanks with toroid-type seals, a minimum of eight (8) locations shall be made available; in all other cases, a minimum of four (4) locations shall be made available. If the District suspects a violation may exist, the District may require such further unobstructed inspection of the primary seal as may be necessary to determine the seal condition for its entire circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
31. The permittee shall inspect all floating tanks at least once every 12 months to determine compliance with the requirements of Rule 4623. The actual gap measurements of the floating roof primary and secondary seals shall be recorded. The inspection results shall be submitted to the District as specified in Section 6.3.5. [District Rule 4623] Federally Enforceable Through Title V Permit
32. The permittee shall inspect the primary and secondary seals for compliance with the requirements of Rule 4623 every time a tank is emptied or degassed. Actual gap measurements shall be performed when the liquid level is static but not more than 24 hours after the tank roof is re-floated. [District Rule 4623] Federally Enforceable Through Title V Permit
33. The permittee shall submit the reports of the floating roof tank inspections to the District within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the District, but the inspection report shall be kept on-site and made available upon request by the District. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
34. Permittee shall maintain the records of the external floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the True Vapor pressure (TVP), API gravity, and type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. The permittee shall keep the records at the facility (on-site) for a period of five years. The records shall be made available to the APCO upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-13-3

EXPIRATION DATE: 05/31/2008

EQUIPMENT DESCRIPTION:

634,000 GALLON ABOVEGROUND MULTI-PRODUCT (GASOLINE, DIESEL, JET FUEL, & ETHANOL) ORGANIC LIQUID STORAGE TANK FR-10 EQUIPPED WITH APPROVED PRIMARY AND SECONDARY SEALS

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The only organic liquids approved for storage in the internal floating roof tank shall be gasoline, diesel, jet fuel, and ethanol. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623] Federally Enforceable Through Title V Permit
4. Tank gauging and sampling devices shall be "gas tight" (as defined in District Rule 4623 (amended 12/12/92)). [District Rule 4623] Federally Enforceable Through Title V Permit
5. Records of monthly organic liquid throughput shall be maintained and shall be made available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit
6. The total annual organic liquid throughput for Tank FR-10 shall not exceed 4,737,700 barrels per year. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Daily VOC emissions shall not exceed 5.42 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The permittee shall comply with recordkeeping requirements in section 6.1 of District Rule 4623 (amended 12/12/92) including recording type of liquid stored, storage temperature, and Reid vapor pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
9. Vapor pressure of stored liquids shall be determined as described in section 6.2 of District Rule 4623 (amended 12/12/92). [District Rule 4623] Federally Enforceable Through Title V Permit
10. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Gap between tank shell and primary seal shall not exceed one and one-half (1-1/2) inches for a metallic-shoe-type seal on welded tanks. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
12. The cumulative length of all gaps, between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
13. No continuous gap greater than one-eighth (1/8) inch shall exceed 10 percent of the tank circumference for all primary seal types. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
14. Gap between the tank shell and secondary seal shall not exceed one-half (1/2) inch for all seal types. [District Rule 4623, 5.1] 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.

15. Cumulative length of all gaps between the tank shell and secondary seal greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference for all seal types. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
16. One end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 24 inches above the stored liquid surface. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
17. Primary seal envelope surrounding the annular vapor space enclosed by the roof edge, stored liquid surface, shoe and seal fabric shall have no openings, holes or tears. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
18. Secondary seal shall have no openings, holes or tears. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
19. The geometry of the shoe shall be such that the maximum gap between the shoe and the tank shell is no greater than double the gap allowed by the seal gap criteria for a length of at least eighteen inches in the vertical plane above the liquid surface. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
20. The secondary seal shall allow easy insertion of probes up to one and one-half (1-1/2) inches in width in order to measure gaps in the primary seal. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
21. Secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
22. Each roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. [District Rule 4623, 5.1.6] Federally Enforceable Through Title V Permit
23. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10 percent of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-18-2

EXPIRATION DATE: 05/31/2008

EQUIPMENT DESCRIPTION:

1,470,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-16, INTERNAL FLOATING ROOF EQUIPPED WITH PDM'S DELTA PRIMARY SEAL AND WIPER TYPE SECONDARY SEAL.

PERMIT UNIT REQUIREMENTS

1. Permittee shall inspect all seals of the floating roof or floating cover at least once a year and shall maintain the seals and vapor control features of the tank in accordance with the manufacturer's recommendations. [District Rule 2520, 9.4.2, District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
2. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
3. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623, 5.3.1.3] Federally Enforceable Through Title V Permit
4. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623, 5.3.2.1.3] Federally Enforceable Through Title V Permit
5. The cumulative length of all gaps, between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623, 5.3.2.1.3] Federally Enforceable Through Title V Permit
6. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623, 5.3.2.1.3] Federally Enforceable Through Title V Permit
7. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623, 5.3.2.1.3] Federally Enforceable Through Title V Permit
8. Cumulative length of all gaps between the tank shell and secondary seal greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference for all seal types. [District Rule 4623, 5.3.2.1.1] Federally Enforceable Through Title V Permit
9. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623, 5.3.2.1.3] Federally Enforceable Through Title V Permit
10. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623, 5.3.2.1.4] 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.

11. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623, 5.3.2.1.5] Federally Enforceable Through Title V Permit
12. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623, 5.3.2.1.6] Federally Enforceable Through Title V Permit
13. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623, 5.3.2.1.7] Federally Enforceable Through Title V Permit
14. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
15. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.10] Federally Enforceable Through Title V Permit
16. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.1.1] Federally Enforceable Through Title V Permit
17. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623, 5.5.2.1.1] Federally Enforceable Through Title V Permit
18. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.1.3] Federally Enforceable Through Title V Permit
19. Rim vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623, 5.5.2.1.4] Federally Enforceable Through Title V Permit
20. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623, 5.5.2.1.5] Federally Enforceable Through Title V Permit
21. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. The fabric sleeve must be impermeable. [District Rule 4623, 5.5.2.1.6] Federally Enforceable Through Title V Permit
22. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623, 6.1] 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.

23. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
24. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
25. Vapor pressure of stored liquids shall be determined as described in section 6.4 of District Rule 4623 (revised 12/20/2001). [District Rule 4623, 6.2] Federally Enforceable Through Title V Permit
26. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
27. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
28. Records of monthly organic liquid throughput shall be maintained on the premises and shall be made available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
29. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1077-23-2

EXPIRATION DATE: 05/31/2008

EQUIPMENT DESCRIPTION:

2,520,000 GALLON ABOVEGROUND CONE ROOF GASOLINE STORAGE TANK FR-21, INTERNAL FLOATING ROOF EQUIPPED WITH URETHANE FABRIC "RESILIENT TOROIDAL SEAL" WITH WOVEN NYLON INSERT, AND "FOAM LOGS" INSERTED BETWEEN TANK SHELL AND PAN RIM.

PERMIT UNIT REQUIREMENTS

1. The true vapor pressure (TVP) of liquids stored in the internal floating roof tank shall be less than 11 psia under storage conditions. [District Rule 4623, 5.1] Federally Enforceable Through Title V Permit
2. No gap between the tank shell and the primary seal shall exceed one-half (1/2) inch. The cumulative length of all primary seal gaps greater than one-eighth (1/8) inch shall not exceed five (5) percent of the tank circumference. No continuous gap greater than one-eighth (1/8) inch shall exceed ten (10) percent of the tank circumference. [District Rule 4623, 5.3.2.3.2] Federally Enforceable Through Title V Permit
3. No gap between the tank shell and the secondary seal shall exceed one-half (1/2) inch. The cumulative length of all gaps between the tank shell and the secondary seal, greater than one-eighth (1/8) inch shall not exceed five (5) percent of the tank circumference. [District Rule 4623, 5.3.2.3.3] Federally Enforceable Through Title V Permit
4. No gap between the tank shell and the secondary seal shall exceed one-half (1/2) inch. [District Rule 4623, 5.3.2.3.3] Federally Enforceable Through Title V Permit
5. The secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal. [District Rule 4623, 5.3.2.3.6] Federally Enforceable Through Title V Permit
6. The secondary seal shall allow easy insertion of probes up to one-half (1/2) in width in order to measure gaps in the primary seal. [District Rule 4623, 5.3.2.3.5] Federally Enforceable Through Title V Permit
7. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623, 5.2] Federally Enforceable Through Title V Permit
8. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.10] Federally Enforceable Through Title V Permit
9. The permittee shall comply with all other applicable provisions of Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The permittee shall comply with all applicable provisions of 40 CFR 60 Subpart Kb. [40 CFR 60 Subpart Kb] 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.

11. The permittee shall comply with recordkeeping requirements in section 6.3 of District Rule 4623 (amended 12/20/01) including recording type of liquid stored, storage temperature, and Reid vapor pressure. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
12. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [District Rule 4623, 5.3.1.3 and 40 CFR 60.112b(a)(1)(i)] Federally Enforceable Through Title V Permit
13. The internal floating roof tank shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: a) a foam or liquid-filled seal mounted in contact with the liquid, b) two seals mounted one above the other so that each forms a continuous closure c) a mechanical shoe seal. [District Rule 4623, 5.5.2.1.5 and 40 CFR 60.112b(a)(1)(ii)] Federally Enforceable Through Title V Permit
14. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.1.1, 40 CFR 60.112b(a)(1)(iii)] Federally Enforceable Through Title V Permit
15. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623, 5.5.2.1.1, 40 CFR 60.112b(a)(1)(iv)] Federally Enforceable Through Title V Permit
16. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.1.3 and 40 CFR 60.112b(a)(1)(v)] Federally Enforceable Through Title V Permit
17. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623, 5.5.2.1.4 and 40 CFR 60.112b(a)(1)(vi)] Federally Enforceable Through Title V Permit
18. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [District Rule 4623, 5.5.2.1.5 and 40 CFR 60.112b(a)(1)(vii)] Federally Enforceable Through Title V Permit
19. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [District Rule 4623, 5.5.2.1.6 and 40 CFR 60.112b(a)(1)(viii)] Federally Enforceable Through Title V Permit
20. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)] Federally Enforceable Through Title V Permit
21. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623, 6.1, 40 CFR 60.113b(b)(a)(3) and (4)] Federally Enforceable Through Title V Permit
22. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit

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23. For this vessel which is equipped with a double seal system, inspections may be carried out as specified above, or using the following procedure every 5 years: Visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals each time the vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other opening in the seal or the seal fabric, or the secondary seal has holes, tears, or other opening in the seal or seal fabric, or the gaskets no longer close off the liquid surfaces, or the slotted membrane has more than 10 percent open area, the operator shall make necessary repairs prior to filling the vessel. [40 CFR 60.113b(a)(3) and (4)] Federally Enforceable Through Title V Permit
24. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623, 6.1] Federally Enforceable Through Title V Permit
25. Vapor pressure of stored liquids shall be determined as described in section 6.4 of District Rule 4623 (amended 12/20/01). [District Rule 4623, 6.2 and 40 CFR 60.116b(e)(2) and (3)] Federally Enforceable Through Title V Permit
26. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
27. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
28. Records of monthly organic liquid throughput shall be maintained on the premises and shall be made available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
29. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623, 6.3] Federally Enforceable Through Title V Permit
30. The operator shall visually inspect the internal floating roof, the primary seal and the secondary seal prior to filling the storage vessel. If holes, tears, or other openings are found, they shall be repaired prior to filling. [40 CFR 60.113b(a)(1)] Federally Enforceable Through Title V Permit
31. Operator shall notify the APCO in writing 30 days prior to the filling or refilling of the vessel. If the inspection is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall make notification 7 days prior to refilling the tank. [40 CFR 60.113b(a)(5)] Federally Enforceable Through Title V Permit
32. Records of each inspection shall be maintained. Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment. If any defects are detected during an inspection, operator shall provide the APCO with a report within 30 days of the inspection. The report shall identify the storage vessel, the nature of the defects, and the date the vessel was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a)(2), (3) and (4)] Federally Enforceable Through Title V Permit
33. The operator shall keep readily available accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The operator shall also keep a record of the liquid stored, the period of storage, and the maximum true vapor pressure of the liquid during the respective storage period. [40 CFR 60.116b(b) and (c)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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34. Available data on the storage temperature may be used to determine the maximum true vapor pressure. For vessels operated above or below ambient temperatures, the maximum true vapor pressure may be calculated using the highest expected calendar month average of the storage temperature. For vessels operated at ambient temperature, the maximum true vapor pressure may be calculated using maximum local monthly ambient temperatures as reported by the National Weather Service. [40 CFR 60.116b(e)(1)] Federally Enforceable Through Title V Permit
35. For crude oil or refined petroleum products the vapor pressure may be obtained by either: a) available data on the Reid vapor pressure and maximum expected storage temperature from nomographs contained in API Bulletin 2517, b) obtained from standard reference texts, c) determined by ASTM Method D2879-83, or c) measured or calculated by an appropriate method approved by the APCO. [40 CFR 60.116b(e)(2) and (3)] Federally Enforceable Through Title V Permit

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