SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
21865 Copley Drive, Diamond Bar, CA 91765

Title Page	
Facility ID:	132124
Revision #:	1
Date:	November 28, 2012

FACILITY PERMIT TO OPERATE

BP WEST COAST PRODUCTS, LLC/CARSON TERMI
24696 S WILMINGTON AVE
CARSON, CA 90745

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By _____
for Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance

FACILITY PERMIT TO OPERATE
BP WEST COAST PRODUCTS, LLC/CARSON TERMI

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SECTION I: PLANS AND SCHEDULES

This section lists all plans approved by AQMD for the purposes of meeting the requirements of applicable AQMD rules specified below. The operator shall comply with all conditions specified in the approval of these plans.

Documents pertaining to the plan applications listed below are available for public review at AQMD Headquarters. Any changes to plan applications will require permit modification in accordance with Title V permit revision procedures.

List of approved plans:

Application	Rule
401675	463
445678	1470

NOTE: This section does not list compliance schedules pursuant to the requirements of Regulation XXX - Title V Permits; Rule 3004(a)(10)(C). For equipment subject to a variance, order for abatement, or alternative operating condition granted pursuant to Rule 518.2, equipment specific conditions are added to the equipment in Section D or H of the permit.

Rule 463 Inspection and Maintenance Plan Approval

Facility ID : 132124 - Company Name : BP West Cost Products LLC – Carson Crude Terminal

LEGAL OWNER OR OPERATOR	BP West Coast Products LLC – Carson Crude Terminal
FACILITY LOCATION	24696 S. Wilmington Avenue, Carson, CA 90745
MAILING ADDRESS	1300 Pier "B" Street Long Beach, CA 90813

ADMINISTRATIVE REQUIREMENTS

This facility shall be subject to the terms and conditions of this plan unless this plan is suspended, revoked, modified, reissued or denied. Failure to maintain a valid plan is a violation or Rule 463.

It is the responsibility of the facility to comply with other District Rules and Regulations and with all laws, ordinances and regulations of other government agencies which are applicable to the operation of the equipment.

This plan does not authorize the emission of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules and Regulations of the AQMD. This plan cannot be considered as permission to violate existing laws, ordinances, regulation, or statutes of the other governmental agencies.

RULE 463 EQUIPMENT

Internal Floating Roof Tank Nos. 401 through 405 listed on Page 2-2 of submitted plan.

CONDITIONS

1. The operator shall conduct the operation of the storage equipment in compliance with all data and specifications submitted with the plan application under which this approval is granted.

2. Floating roof tank seals shall be properly installed and continuously maintained in good operating condition.

SCAQMD RULE 463 INSPECTION AND MAINTENANCE PLAN
FOR
BP CARSON CRUDE TERMINAL
CARSON, CALIFORNIA

Submitted to:

South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, California 91765

Prepared by:

LA BASIN MARINE and LAND TERMINALS
Environmental Department
1300 Pier "B" Street
Long Beach, CA 90813

May 2004

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List of Acronyms

CFR	Code of Federal Regulations
H&S	Health and Safety
OSHA	Occupational Safety and Health Administration
PPE	personal protective equipment
SCAQMD	South Coast Air Quality Management District
TIMP	Tank Inspection and Maintenance Plan
VOC	Volatile Organic Compounds

1.0 Introduction

The South Coast Air Quality Management District (SCAQMD) has developed Rule 463 [1] – Organic Liquid Storage, to regulate volatile organic compounds (VOC) emissions from storage tanks. This rule places specific standards for storage tank components, especially roofs and seals; tank emptying / cleaning / repair, degassing, roof re-floating operations; tank emissions; and temporary tanks. Other requirements are also specified such as record keeping, reporting, and agency notifications. In addition, this rule requires submittal of a Tank Inspection and Maintenance Plan (TIMP) for procedures to inspect and maintain compliance with the standards for storage tanks per Rule 463.

1.1 Statement of Objectives

This TIMP is written to fulfill the requirements of the SCAQMD Rule 463. The purpose of the TIMP is to ensure that BP Carson Crude Terminal (CCT) operators maintain their storage tanks and associated air pollution control equipment at the CCT Terminal, in a manner consistent with good air pollution control practices. The TIMP also ensures that CCT operators are prepared to correct defects within the allowable time after their occurrence in order to minimize excess emissions of VOC to the atmosphere. This TIMP includes the following:

- Description of procedures for inspecting and maintaining storage tanks subject to this rule, including BP's proposed self-inspection/auditing procedures in addition to the required inspection by SCAQMD;
- An inventory list of storage tanks subject to Rule 463;
- Proposed self-inspection and auditing schedules;
- Number of certified personnel dedicated to the program; and
- Health and safety procedures for entering on top of tanks for inspection and maintenance.

This TIMP is developed for CCT personnel and/or contractors to conduct semi-annual inspections of storage tanks at the CCT Terminal.

1 SCAQMD Rule 463 – Organic Liquid Storage. Last Amended March 11, 1994.

1.2 Report and Notification Contacts

The facility Inspection and Maintenance Plan, its revision, and all reports required to be submitted to the SCAQMD, must be addressed as follows:

Executive Officer
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, California 91765

Telephone: (909) 396-2000

Submit copies of all correspondence with SCAQMD to:

Health, Safety, Security, Environmental, HSSE Advisor
1300 Pier "B" Street
Long Beach, California 90813
Attn: Mr. Stephen D. Comley

Telephone: (562) 499-2241
Fax: (562) 499-2300

1.3 Tank Inspection and Maintenance Plan Organization

This TIMP is organized as follows:

- Section 1.0 presents the introduction;
- Section 2.0 provides specifics of our tank inspection and maintenance plan; and
- Section 3.0 provides a listing of BP's health and safety procedures and a summary of personal protective equipment (PPE) required for tank seal inspections; and
- A list of H&S procedures for Rule 463 TIMP requirements located within the *2002 Pipelines (NA) Business Unit Safety Manual.*

2.0 Tank Inspection and Maintenance Plan

The following sections addresses the requirements for the TIMP as specified in SCAQMD Rule 463.

2.1 General Facility and Process Descriptions

Carson Crude Terminal, a crude oil bulk terminal (SIC 5171), is located at 24696 Wilmington Avenue, Carson, California. The Terminal contains crude oil. The tank farm at the CCT Terminal consists of external floating roof tanks for organic liquid storage, therefore, these tanks are subject to Rule 463.

2.2 Inventory of Floating Roof Tanks

Tank regulation, SCAQMD Rule 463, determines which products can be stored in which tank types. The criteria are as follows:

- Generally, products with a true vapor pressure less than 0.5 psia may be stored in any tank.
- Products with a true vapor pressure greater than 0.5 psia but less than 11 psia can be stored in either a fixed roof tank with an operating vapor recovery system or a floating roof tank with dual tank seals.
- Products with a true vapor pressure of 11 psia or above may not be stored in a floating roof tank. This material may be stored in either a fixed roof tank with vapor recovery with at least 95 percent by weight VOC recovery, or in a pressure vessel.
- Individual tank permits may limit the type of product that may be stored in a particular tank; therefore it is crucial that the permit conditions for each tank be evaluated prior to filling.

Table 2-1 presents a list of floating roof tanks that fall under one or more of the above criteria; therefore, are subject to the requirements of Rule 463.

Table 2-1. Inventory of Floating Roof Tanks Subject to SCAQMD Rule 463 at Marine Terminal 2

Permit ID	Capacity (BBL)	Product (*) Out of Service (OOS)	Tank ID	Shell Type Welded (W) Riveted (R)	Tank Dimensions		Seal Type		Floating Roof Type Double Deck (DD) Pontoon (P)	Tank In-Service Date
					Dia-meter (ft)	Height (ft)	Primary Class	Secondary Class		
F53156	376,000	Crude Oil	401	W	232	52	Shoe	Rim Mounted District Approved	Pontoon	1978
F53157	376,000	Crude Oil	402	W	232	52	Shoe	Rim Mounted District Approved	Pontoon	1978
F53158	376,000	Crude Oil	403	W	232	52	Shoe	Rim Mounted District Approved	Pontoon	1978
F53159	450,000	Crude Oil	404	W	240	61	Shoe	Rim Mounted	Pontoon	1983
F53160	450,000	Crude Oil	405	W	240	61	Shoe	Rim Mounted	Pontoon	1983

* Products can vary from this inventory.
W = Welded Construction
R = Riveted Construction

2.3 Inspection Requirements and Schedules

In general, the floating roof tanks subject to Rule 463 will be regularly inspected to assure that they meet tank seal specifications with their permit conditions and/or Rule 463 requirements. In addition, tank shell and roof integrity, unsealed roof legs, open hatches, open emergency roof drains or vacuum breakers, and tears in the primary and secondary seals will be inspected and recorded. The vapor space LEL for internal floating roof tanks will also be monitored and recorded.

2.3.1 Self-Inspection

SCAQMD Rule 463 calls out a specific self-inspection interval for tanks covered by the rule. At the CCT Terminal, the external floating roof tanks subject to this rule will be inspected twice a year at approximately six-month intervals, but at intervals not less than four months apart by a SCAQMD certified inspector as set forth in Rule 463. Each tank will also require an inspection when it is emptied and degassed or after it is returned to service. Table 2-3 presents Rule 463 semi-annual tank seal inspections schedule.

To lend further assurance to BP's semi-annual self-inspection program under Rule 463, BP will implement the following steps:

1) Initial Inspections:

   The certified inspector will perform tank seal inspections for all applicable tanks under Rule 463 at the CCT Terminal. This step will focus on the initial inspection of the tank condition and the initial inspection report that will be issued to the contract repair organization and the SCAQMD. The tanks will be inspected according to Rule 463 to assure that they meet tank seal specifications, including tank shell and roof integrity, unsealed roof legs, guide poles, open hatches, open emergency roof drains or vacuum breakers etc., and tears or holes in the primary and secondary seals are recorded. BP certified inspector will generate an inspection report detailing the any gaps and any defects after each inspection.

2) Repairs:

   Once the initial inspection has been completed, the contract repair organization (BP's contractor) will repair or replace any components such as seals, valves, vents, gaskets, socks, hatches, covers of roof openings, etc. that are found to be defective or have gaps that do not meet the requirements of Rule 463 within 72 hours after an inspection or before refilling an emptied and degassed tank. The contract repair organization will complete detailed logs of all repairs made and forward copies to the Terminal's HSSE Advisor for verification, signature and recordkeeping.

Table 2-3. Rule 463 Semi-Annual Tank Seal Inspections Schedule

Tank No.	AQMD Permit ID	Inspection Frequency [a]	
		Month	Month
401	F515156	April	October
402	F53157	April	October
403	F53158	April	October
404	F53159	April	October
405	F53160	April	October

[a] Note: The proposed inspection schedule may fluctuate as much as two months ahead of schedule or up two months late, depending on the availability of each tank for inspection. However, it is BP's intention to meet Rule 463 inspection frequency under 463 (e)(3)(A), which is to inspect all tanks twice per year at 4 to 8 months intervals.

3) Post Inspections:

BP certified inspector will perform post inspection of each tank. This is to ensure that all Rule 463 repairs have been completed for each tank before it can be compliance certified. This step will focus on the final inspection, final inspection reporting, and quality of repair (if any). In general, the tanks will be re-inspected according to Rule 463, only in areas where defects were found to assure that the repairs were made, as well as to check the quality of each repair. The inspector will conduct a field check of all items listed in the detailed repair logs provided by the contract repair organization and sign-off to attest that these items have been repaired. Upon completion of the post inspection, the contracted certified inspector will generate a post inspection report certifying that the tank is in compliance.

2.3.2 Additional Self-Inspection Procedures

In addition to the self-inspection program for the tanks currently subject to Rule 463, BP plans to follow the practices specified in American Petroleum Institute (API) 653 for tanks inspection. Any scheduled or non-scheduled tank inspections that might identify non-compliance items will be repaired and reported according to Rule 463 to the SCAQMD.

2.4 Repair

SCAQMD Rule 463 has strict tank repair time. For any tank subject to this rule and found to be out of compliance, BP will attempt at repair to bring it back into compliance within 72 hours. If the repair cannot be made within 72 hours, BP will take the tank out-of-service or file for a variance to request for longer repair period.

2.5 Notifications and Reporting Requirements

For any tank subject to Rule 463, BP will do the following notifications and/or reporting requirements:

- Inform SCAQMD within five days of a successful inspection by submitting Rule 463 inspection report(s).
- Inform SCAQMD, in writing within 120 hours of a determination of non-compliance and corrective action to achieve compliance for the tank.
- Notify SCAQMD, in writing at least 24 hours, but no more than 10 days prior to the start of the emptying operation, or the degassing of any storage tank.
- Notify SCAQMD, in writing at least two weeks prior to the starting, of any Rule 463 tank roof re-floating (exception - drain dry tanks that change service – SCAQMD notified by degassing company in accordance with permit condition)

- Submit to SCAQMD any revision made to TIMP procedures within 30 days of any change.

To ensure the accuracy and completeness of each report generated after each inspection, BP certified inspectors will sign-off each inspection report and certify that it is complete. In addition, the BP HSSE Advisor will review each document produced by the BP tank seal inspection and repair team, before sending it the SCAQMD.

2.6 Recordkeeping Requirements

The BP's HSSE Advisor will maintain all documents regarding tanks inspections, repairs, audits, malfunctions, and agency reports on file for at least 5 years. The BP HSSE Advisor provides copies of audit reports and agency inspections for records at the BP Carson Refinery. These documents will be made available to SCAQMD upon request.

2.7 Training and Certification

All BP tank seal inspectors are certified through the SCAQMD Tank Self-Inspection Program. At any given time, there are a number of certified inspectors routinely available for conducting inspections to ensure compliance with SCAQMD Rule 463 requirements. All inspectors hold current certificates issued by the SCAQMD and are in good standing in this program.

3.0 Health and Safety Procedures

The greatest potential for safety hazards will be related to field inspections of BP's primary seals on top of floating roof tanks. To ensure that the BP personnel and its contractors minimize the risk of injuries and accidents while conducting tank seal inspection, all BP personnel, contractors, and other third parties shall follow BP's Health and Safety (H&S) procedures listed below and provided in the most current *BP Pipelines (NA) Business Unit Safety Manual*. BP is providing the SCAQMD with a copy of their current safety procedures. The SCAQMD Inspectors will follow their agency's health and safety procedures when conducting tank seal audits for Carson Crude Terminal. SCAQMD will provide BP with their H&S procedures, including PPE that will be worn during tank seal inspections. BP's H&S measures are in accordance with Federal Occupational Safety and Health Administration (OSHA) 29 Code of Federal Regulations (CFR) Part 1910 for Occupational Health and Safety Standards, and OSHA 29 CFR Part 1926 for Safety and Health Regulations for Construction; and California Code of Regulations, Title 8, Chapter 4 Division of Industrial Safety, Subchapter 4 for Construction Safety Orders, Subchapter 7 for General Safety Orders, and Subchapter 15 for Petroleum Safety Orders – Refining, Transportation and Handing.

For the purpose of Rule 463 TIMP H&S requirements, the following list of BP's H&S procedures can be found in the most current edition of the *BP Pipelines (NA) Business Unit Safety Manual*:

- **Procedure C5-1 for Confined Space Entry**
- **Procedure E3-1 for Emergency Preparedness**
- **Procedure A2-1 for Accident Reporting and Investigating**
- **Procedure P2-1 for Personal Protective Equipment (PPE)**
- **Procedure E5-1 for Eye and Face Protection**
- **Procedure F4-1 for Fire-Resistant Clothing (FRC)**
- **Procedure H4-1 for Hearing Conservation Program**
- **Procedure S3-1 for Smoking Policy**
- **Appendix I – Procedure V1-1 for Vehicle Safety**

- **Procedure F2-1 for Fall Protection Program**
- **Procedure R3-1 for Respiratory Protection Program**
- **Procedure C-6 for Contractor Safety**
- **Procedure H8-1 for Hydrogen Sulfide Safety Program**

3.1 Personal Protective Equipment

The following is a summary of PPE that are required to be worn by BP personnel, contractors and third parties when entering on top of floating roof tanks for tank seal inspection:

- Hard hats;
- Safety shoes;
- Fire-Resistant Clothing;
- Fall Protection (on tanks without standard guardrail system);
- Hearing protection in noise hazard areas;
- Safety glasses; and
- Gloves.
- Respiratory protection a s required in Procedure R3-1