

**MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT  
TITLE V OPERATING PERMIT TV 55-01  
EVALUATION REPORT**

24580 Silver Cloud Court  
Monterey, CA 93940  
Telephone: (831) 647-9411

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APPLICATION RECEIVED FROM:

ExxonMobil Oil Corporation  
12851 E. 166 Street  
Cerritos, CA 90703

PLANT SITE LOCATION:

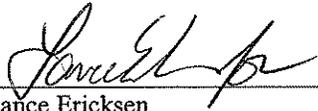
67040 Sargent Canyon Road  
San Ardo, CA 93450

APPLICATION PROCESSED BY:

Mike Sewell, Air Quality Engineer

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APPROVED FOR RELEASE BY:

  
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Lance Ericksen  
Engineering Division Manager

    MAR - 5 2010      
Date

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Dated: February 12, 2010

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Nature of Business:      Petroleum Storage and Transfer

SIC Codes:      5171 - Petroleum Bulk Stations and Terminals

**RESPONSIBLE OFFICIAL:**

Name: Mr. James B. Rose  
Title: West Coast/Rockies Area Manager  
Phone: (310) 212-2935

**ALTERNATIVE RESPONSIBLE OFFICIAL:**

Name: Mr. Ralph Mixon  
Title: Area Supervisor  
Phone: (310) 212-1830

**FACILITY CONTACT PERSON:**

Name: Mr. Mike Sparks  
Title: Unit Train Coordinator  
Phone: (831) 627-2343

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## PROJECT DESCRIPTION

ExxonMobil Oil Corporation's existing Title V permit (TV34-01A) for the San Ardo Unit Train Facility expires on May 31, 2010. This application is for renewal of ExxonMobil's Title V Permit on the required five-year renewal cycle.

## FACILITY DESCRIPTION

ExxonMobil Oil Corporation operates a petroleum storage and transfer facility in the San Ardo Oil field in Southern Monterey County. The facility purchases crude oil from the field producers. The crude is stored in storage tanks until it is loaded into rail cars or tanker trucks via loading systems.

The ExxonMobil Oil Corporation San Ardo Station is considered a federal Major Source and subject to the Title V permitting program due to the potential to emit Volatile Organic Compounds (VOC).

## EQUIPMENT DESCRIPTION

### PETROLEUM STORAGE AND TRANSFER FACILITY CONSISTING OF:

1. Storage Tanks

Fixed Roof Tank, 48' Diameter x 40' Height, 15,000 Barrel Nominal Capacity.

Fixed Roof Tank, 115' Diameter x 29' Height, 55,000 Barrel Nominal Capacity.

Fixed Roof Tank, 100' Diameter x 38' Height, 55,000 Barrel Nominal Capacity.

2. Crude Oil Heaters

Three Crude Oil Heaters, Natural Gas Fired With Fuel Oil Standby, Each Rated At 7.2 MMBtu/Hr Maximum Heat Input.

3. Bulk Tank Car Loading System With Thermal Oxidizer

Tank Car Articulated Loading Booms Capable Of Simultaneously Filling Six Sets Of Tank Cars, With All Tank Cars Interconnected To The Vapor Recovery System.

Vapor Recovery System With Nitrogen Purging, Automated Control Valves, And Vapor Collection/Overfill Hoses Vented Directly To Liquid Knockout Tanks.

Two Liquid Knockout Tanks, Each With 10,000 Gallon Capacity.

Thermal Oxidizer, Burner Rated At 10 MMBtu/Hr For Natural And Waste Gas.

4. Truck Unloading/Loading System

5. Ancillary Equipment

Diesel Fired Emergency Water Pump.

Gasoline Fired Emergency Water Pump.

Laboratory Fume Hood.

#### **APPLICABLE FEDERAL REQUIREMENTS**

Rule 200 - Permits Required

Rule 201 - Sources Not Requiring Permits

Rule 207 - Review of New or Modified Sources

Rule 214 - Breakdown Condition

Rule 218 - Title V: Federal Operating Permits

Rule 300 - District Fees (Emission Statement - Section 4.4)

Rule 308 - Title V: Federal Operating Permit Fees

Rule 400 - Visible Emissions

Rule 403 - Particulate Matter

Rule 404 - Sulfur Compounds and Nitrogen Oxides

Rule 412 - Sulfur Content of Fuels

Rule 416 - Solvents

Rule 417 - Storage of Organic Liquids

Rule 421 - Violations and Determination of Compliance

Rule 426 - Architectural Coatings

40 CFR Part 60, Subpart A - New Source Performance Standards, General Provisions

40 CFR Part 60, Subpart K - Performance Standards for Storage Vessels for Petroleum Liquids

40 CFR Part 61, Subpart M - National Emission Standard for Asbestos

40 CFR Part 64 - Compliance Assurance Monitoring

40 CFR Part 68 - Risk Management Planning: Accidental Release Prevention (Section 112r)

40 CFR Part 82 - Protection of Stratospheric Ozone

#### **COMPLIANCE DETERMINATION FOR APPLICABLE FEDERAL REQUIREMENTS**

##### Rule 200 - Permits Required

Historically, this facility has complied with the permit application requirements. Continued compliance is expected. No specific conditions relative to this rule will be included on the this permit.

##### Rule 201 - Sources not Requiring Permits

This is the District regulation which identifies equipment which are not subject to permit. No specific conditions relative to this rule will be included on this permit.

Rule 207 - Review of New or Modified Sources

This facility started operation in 1951. The original operation consisted of the storage tanks and crude oil heaters. The transfer of crude oil was via a pipeline to Estero bay with a backup system to load tanker trucks. In 1997, the facility decided to abandon the pipeline in favor of a railcar loading system. Therefore, the railcar loading equipment underwent NSR permitting, and those conditions will be included on the Title V permit as federally enforceable.

Rule 214 - Breakdown Condition

This is the implementing regulation in which the District has established the criteria for reporting breakdowns. The requirements imposed by this rule will be included on this permit.

Rule 218 - Title V: Federal Operating Permits

This is the implementing regulation by which the District issues the federal Operating Permits. All requirements imposed by this rule will be included on the facilities' Title V permit.

Rule 300 - District Fees (Section 4.4 Emission Statement)

The facility is subject to the *Emission Statement* as required by Section 182(a)(3)(B)(ii) of the federal Clean Air Act. Historically, the facility has submitted the required *Emission Statement*. An appropriate condition will be included on this permit to ensure compliance with the *Emission Statement* requirement of this rule.

Rule 308 - Title V: Federal Operating Permit Fees

This is the District's fee rule for Title V. Appropriate conditions will be included on the Title V permit to ensure compliance with the fee provisions contained in this rule.

Rule 400 - Visible Emissions

This rule is applicable to the emissions from the facility. Appropriate conditions will be included on the permit to ensure compliance with this rule.

Rule 403 - Particulate Matter

The 0.15 grains per dry cubic foot emission standard is applicable to all stationary fuel fired equipment at the facility except internal combustion engines.

Crude Oil Heaters - Based upon the requirements of Rule 403, the volumetric flow rate of 1,045 SDCFM firing natural gas and 1,103 SDCFM firing oil would establish an emission limit of 1.34 lbs PM<sub>10</sub>/hr on natural gas and 1.42 lbs PM<sub>10</sub>/hr on oil [NG - (1,045 SDCFM)\*(0.15 grains/SDCF)\*(1 lb/ 7000 grains)\*(60 M/Hr) = 1.34 lbs PM<sub>10</sub>/hr; Oil - (1,103 SDCFM)\*(0.15 grains/SDCF)\*(1 lb/7000 grains)\*(60 M/Hr) = 1.42 lbs PM<sub>10</sub>/hr]. AP-42 establishes an emission limit of 7.6 lbs PM<sub>10</sub>/MMCF NG and 11.5 lbs TSP/Kgal oil combusted (from Table 1.4-2 dated 7/98 and Tables 1.3-1 & 1.3-2 dated 9/98) which would equate to hourly emissions of 0.052 lbs PM<sub>10</sub>/hr while firing on NG [(7.2 MMBtu/hr)(1MMCF/ 1050 MMBtu)(7.6 lbs PM<sub>10</sub>/MMCF) = 0.052 lbs PM<sub>10</sub>/hr] and 0.54 lbs TSP/hr while firing on oil [(7.2 MMBtu/hr)(6.53 gals/MMBtu)(11.5 lbs TSP/Kgal)(Kgal/1000 gal) = 0.54 lbs TSP/hr]. Both the gas and oil emissions calculated based on AP-42 factors are well below the Rule 403 grain loading requirement. Therefore, no monitoring/testing or record keeping will be included on the permit to show compliance with grain loading requirement for this equipment.

Thermal Oxidizer - Based upon the requirements of Rule 403, the volumetric flow rate of 1,452 SDCFM for this

grains)\*(60 M/Hr) = 1.87 lbs PM<sub>10</sub>/hr]. AP-42 establishes an emission limit of 7.6 lbs PM<sub>10</sub>/MMCF NG (from Table 1.4-2 dated 7/98) which would equate to hourly emissions of 0.052 lbs PM<sub>10</sub>/hr while firing on NG [(10 MMBtu/hr)(1MMCF/1050 MMBtu)(7.6 lbs PM<sub>10</sub>/MMCF) = 0.072 lbs PM<sub>10</sub>/hr]. This calculated factor is well below the Rule 403 grain loading requirement. Therefore, no monitoring/testing or record keeping will be included on the permit to show compliance with the grain loading requirement for this equipment.

#### Rule 404 - Sulfur Compounds and Nitrogen Oxides

This rule is applicable to the emissions from the facility.

Crude Oil Heaters - Compliance with the 0.2% by volume (2000 ppmv) limit for SO<sub>2</sub> is assumed while firing on natural gas and the following calculation will show compliance while firing on fuel oil. When firing on Number 6 standby fuel with a 0.5% sulfur content, AP-42 establishes an emission factor of 78.5 lbs SO<sub>2</sub>/Kgal (from Table 1.3-1 dated 9/98) which would equate to an emission rate of 3.7 lbs SO<sub>2</sub>/hr [(7.2 MMBtu/hr)(6.53 gals/MMBtu)(78.5 lbs SO<sub>2</sub>/Kgal)(Kgal/1000 gal) = 3.7 lbs SO<sub>2</sub>/hr]. The SO<sub>2</sub> concentration at this emission rate would be 325.1 ppmv [(3.7 lbs SO<sub>2</sub>/hr)\*((MM lbmoles air)/(64.1 lbmole SO<sub>2</sub>))\*((379 Ft<sup>3</sup> Air)/(lbmole air))/((1,103 SDCFM)\*(60 M/Hr)) = 330.6 ppmv]. This value is well below the 2000 ppmv SO<sub>2</sub> allowed in this rule. Therefore, no monitoring/testing or record keeping requirements will be included on the permit to show compliance with the 0.2% by volume SO<sub>2</sub> limit for this equipment.

Compliance with the 140 lb/hr NO<sub>x</sub> limit is assumed due to the following emission calculations. AP-42 establishes emission factors of 55 lbs NO<sub>x</sub>/Kgal while firing of fuel oil and 100 lbs NO<sub>x</sub>/MMCF of natural gas (from AP-42 Tables 1.3-1 dated 9/98 and 1.4-1 dated 7/98) which would equate to hourly emissions of 0.69 lbs NO<sub>x</sub>/hr while firing on NG [(7.2 MMBtu/hr)(1 MMCF/1050 MMBtu)(100 lbs NO<sub>x</sub>/MMCF) = 0.69 lbs NO<sub>x</sub>/hr] and 4.5 lbs NO<sub>x</sub>/hr while firing on oil [(7.2 MMBtu/hr)(6.53 gals/MMBtu)(55 lbs NO<sub>x</sub>/Kgal)(Kgal/1000 gal) = 2.59 lbs NO<sub>x</sub>/hr]. Based upon these calculations, the crude oil heaters are not capable of exceeding the 140 lb hour NO<sub>x</sub> limit. Therefore, no monitoring/testing or record keeping requirements will be included on the permit to show compliance with the 140 lb/hr NO<sub>x</sub> limit for this equipment.

Thermal Oxidizer - Compliance with the 0.2% by volume (2000 ppmv) limit for SO<sub>2</sub> is assumed while firing natural gas and the following calculation will show compliance while combusting natural gas and waste gas. The waste gas has been tested at 0.013% sulfur - when operated as a destruction device, the oxidizer utilizes 150 SCFM natural gas while destroying 882 SCFM waste gas and the waste gas has a specific volume of 13.06 ft<sup>3</sup>/lb, which would equate to an emission rate of 1.06 lbs SO<sub>2</sub>/hr [(882 SCFM)/(13.06 ft<sup>3</sup>/lb)(60 M/Hr)(0.013%)(2) = 1.06 lbs SO<sub>2</sub>/hr]. The SO<sub>2</sub> concentration at this emission rate would be 71.9 ppmv [(1.06 lbs SO<sub>2</sub>/hr)\*((MM lbmoles air)/(64.1 lbmole SO<sub>2</sub>))\*((379 Ft<sup>3</sup> Air)/(lbmole air))/((1,452 SDCFM)\*(60 M/Hr)) = 71.9 ppmv]. This value is well below the 2000 ppmv SO<sub>2</sub> allowed in this rule. Therefore, no monitoring/testing or record keeping requirements will be included on the permit to show compliance with the 0.2% by volume SO<sub>2</sub> limit for this equipment.

Compliance with the 140 lb/hr NO<sub>x</sub> limit is assumed due to the following emission calculations. The vendor guarantees an emission rate of 250 lbs/NO<sub>x</sub>/MMCF of natural gas combusted which equates to hourly emissions of 2.38 lbs NO<sub>x</sub>/hr while firing on NG [(10 MMBtu/hr)(1 MMCF/1050 MMBtu)(250 lbs NO<sub>x</sub>/MMCF) = 2.38 lbs NO<sub>x</sub>/hr]. Based upon these calculations, the thermal oxidizer is not capable of exceeding the 140 lb hour NO<sub>x</sub> limit. Therefore, no monitoring/testing or record keeping requirements will be included on the permit to show compliance with the 140 lb/hr NO<sub>x</sub> limit for this equipment.

Diesel Fired Emergency Water Pumps - Compliance is assumed based upon a maximum SO<sub>2</sub> emission rate of 0.31 lbs/hr [From AP-42 Table 3.3-1, dated 10/96 - (150 Bhp)\*(2.05E-3 lbs/Hp-hr) = 0.31 lbs SO<sub>2</sub>/hr] for the engine. The SO<sub>2</sub> concentration at this calculated emission level would be 84.6 ppmv for the Emergency Water Pump [(0.31 lbs SO<sub>2</sub>/hr)\*((MM lbmoles air)/(64.1 lbmole SO<sub>2</sub>))\*((379 Ft<sup>3</sup> Air)/(lbmole air))/((360 SDCFM)\*(60 M/Hr)) = 84.6

ppmv]. This value is well below the 2000 ppmv SO<sub>2</sub> allowed in this rule. Therefore, no monitoring/testing or record keeping requirements will be included on the permit to show compliance with the 0.2% by volume SO<sub>2</sub> limit for this equipment.

Compliance with the 140 lb/hr NO<sub>x</sub> limit based upon the following emission calculation. The NO<sub>x</sub> emissions from the Emergency Water Pump based upon AP-42 factors (Table 3.3-1, dated 10/96), are 4.65 lbs NO<sub>x</sub>/hr [(150 BHp)(0.031 lb/hp-hr) = 4.65 lbs NO<sub>x</sub>/hr]. This calculated value is well below the 140 lb/hr limit contained in the rule. Therefore, no monitoring/testing or record keeping requirements will be included on the permit to show compliance with the 140 lb/hr NO<sub>x</sub> limit for this equipment.

#### Rule 412 - Sulfur Content of Fuels

This rule which requires that the sulfur content of fuels combusted be less than 50 grains per 100 cubic feet for gaseous fuel and less than 0.5% by weight for any liquid or solid fuel is applicable to this facility. Combustion of natural gas assures compliance with the 50 grain limit while the backup fuel is Fuel Oil Number 2 with sulfur content below 0.5%.

Note that the combustion of waste gas in the thermal oxidizer is not subject to the requirements of this Rule. Section 1.2 exempts the incineration of waste gas provided that the waste gas has a heat content of less than 300 BTU/ft<sup>3</sup> and the fuel used to incinerate the waste gas is in compliance with the sulfur limits. The operation of the thermal oxidizer meets these requirements as testing has shown the waste gas to have a heating value of less than 10 BTU/ft<sup>3</sup>, and the fuel used to incinerate the waste gas is pipeline quality natural gas.

#### Rule 416 - Solvents

This rule has specific emission limits and record keeping requirements for solvents. This rule applies to the Laboratory Fume Hood at this facility. Historically, daily material usage records show that the facility has been operating below the 40 pound per day limit.

Appropriate conditions will be included on the permit to ensure compliance with the provisions of this rule.

#### Rule 417 - Storage of Organic Liquids

This rule requires vapor loss control devices on organic storage tanks if the organic liquid stored has a true vapor pressure of 1.5 psi at actual storage conditions.

Historically, the true vapor pressure of the heavy crude extracted from the San Ardo Oil Field has been well below the 1.5 psi threshold for installation of a vapor loss control device. Testing conducted on December 11, 2009 using the HOST/40 Test Method established the true vapor pressure for the cutter stock as <0.01 psi at a tank storage temperature of 60° F, and true vapor pressures for the crude oil of 0.04 and 0.02 psi at the tank storage temperatures of 168° F and 150° F, respectively. Therefore, the storage tanks are not subject to the requirements of this Rule.

To ensure that this Rule does not apply to the storage tanks at the facility on a continual basis, the permit will include the requirement to test the true vapor pressure of the crude oil at the actual storage temperature on an annual basis.

#### Rule 426 - Applications of Nonarchitectural Coatings

This rule is applicable to all applications of Nonarchitectural coatings and limits the VOC content of these coatings. The facility is in compliance with the requirements of this rule.

An appropriate condition will be included on the permit to ensure compliance with the requirements of this rule.

40 CFR Part 60, Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978

The storage tanks predate this requirement. The tanks were installed and operational in 1951 and have not undergone reconstruction or modification since installation.

No conditions pertaining to this part will be included on the permit.

40 CFR Part 61, Subpart M - National Emission Standard for Asbestos

This facility on an as needed basis is subject to Section 61.145 through 61.147 - standards for the demolition and renovation of asbestos. Historically, the facility has been in compliance with the requirements of these standards. An appropriate condition will be included on the permit to ensure compliance with these requirements.

40 CFR Part 64 - Compliance Assurance Monitoring

The *applicability requirements* (§64.2) require that: 1) the unit is subject to an emission limitation or standard; 2) the unit uses a control device; and 3) the unit has potential pre-control device emissions of 100% of the major source thresholds.

The potential to emit of the railcar loading pre-thermal oxidizer is 20 tons of VOC per year. Therefore, this equipment is not subject to the CAM requirement as the pre-control device emissions are well below the major source thresholds.

No conditions pertaining to this part will be included on the permit.

40 CFR Part 68 - Risk Management Planning: Accidental Release Prevention (Section 112r)

This facility is not presently subject to the requirements of this part. An appropriate condition will be included on the permit to ensure compliance with the requirements of this part if the facility were to become subject.

40 CFR Part 82 - Protection of Stratospheric Ozone

This facility is in compliance with the requirements of this part. An appropriate condition will be included on the permit to ensure compliance with these requirements.

**THE FOLLOWING WILL BE INCLUDED ON THE TITLE V PERMIT:**

**FEDERALLY ENFORCEABLE EMISSION LIMITS AND STANDARDS**

1. ExxonMobil Oil Corporation shall operate the Vapor Recovery System and Thermal Oxidizer whenever railcars are being loaded. [District Rule 207]
2. ExxonMobil Oil Corporation shall ensure that all tank car hatches are closed and sealed during loading operations to prevent fugitive emission losses. [District Rule 207]

3. ExxonMobil Oil Corporation shall operate the Thermal Oxidizer at a minimum combustion temperature of 1000° F during any period of time that the vapor recovery system is providing waste gas to the thermal oxidizer. [District Rule 207]
4. ExxonMobil Oil Corporation shall operate and maintain the Thermal Oxidizer such that the minimum overall hydrocarbon destruction efficiency is 98 percent. [District Rule 207]
5. No air contaminant shall be discharged into the atmosphere for any period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than Ringelmann 1 or equivalent 20% opacity. [District Rule 400]
6. Particulate matter shall not exceed 0.15 grains per standard dry cubic foot in any exhaust stream, except stationary internal combustion engines. [District Rule 403]
7. Sulfur compounds calculated as sulfur dioxide (SO<sub>2</sub>) shall not exceed 0.2 percent by volume in the exhaust streams from the Crude Oil Heaters, the Thermal Oxidizer, or the Emergency Diesel Engine. [District Rule 404]
8. Oxides of Nitrogen, calculated as nitrogen dioxide (NO<sub>2</sub>), from the Crude Oil Heaters, the Thermal Oxidizer, or the Emergency Engines shall not exceed 140 lbs/hr. [District Rule 404]
9. The sulfur content on any fuel oil used at the facility shall not exceed 0.5 percent by weight. [District Rule 412]
10. The sulfur content on any gaseous fuel used at the facility shall not contain sulfur compounds, calculated as hydrogen sulfide at standard conditions, in excess of 50 grains per 100 cubic feet. [District Rule 412]
11. No more than 40 pounds per day of solvent, as defined in District Rule 416, shall be discharged from any individual operation at the facility. [District Rule 416 Adopted 1/17/01]
12. ExxonMobil Oil Corporation shall store no organic material in the Storage Tanks with a vapor pressure equal to or greater than 1.5 psi under storage conditions until such time that the tanks are equipped with a vapor loss control device. [District Rule 417]
13. ExxonMobil Oil Corporation shall limit emissions of volatile organic compounds from the use of architectural coatings pursuant to the requirements of District Rule 426. [District Rule 426]
14. Should the facility, as defined in 40 CFR §68.3 become subject to Part 68, then ExxonMobil Oil Corporation shall submit a risk management plan (RMP) by the date specified in 40 CFR §68.10. Once

subject to Part 68, ExxonMobil Oil Corporation shall certify compliance with these requirements as part of the annual compliance certification required by 40 CFR Part 70 and this permit. [40 CFR Part 68]

15. ExxonMobil Oil Corporation shall comply with the requirements of 40 CFR Part 82 - Protection of Stratospheric Ozone. [40 CFR Part 82]

#### TESTING REQUIREMENTS AND PROCEDURES

16. ExxonMobil Oil Corporation shall conduct annual performance tests of the vapor control system in accordance with Monterey Bay Unified Air Pollution Control District test procedures. The written results of such performance tests shall be furnished no later than thirty (30) days of the test completion. [District Rule 207]

Test protocols shall be submitted to the District no later than thirty (30) days prior to the performance tests, and written notice shall be provided to the District a minimum of seven (7) days prior to the actual date of the approved testing so that a District observer can be present.

The performance tests shall include, but will not be limited to, the determination of the following parameters:

- a) Inlet and outlet total and Non-methane hydrocarbons.
- b) Total and Non-methane hydrocarbon destruction efficiency.

and the following process parameters:

- c) Total natural gas consumed.
- d) Exhaust gas temperature.
- e) Exhaust gas flow rate in SDCFM.
- f) Residence time.

17. No testing is specified for the generic (Rule 400) opacity requirement from condition number 5 while firing on gaseous fuels. When a specific Crude Oil Heater or Emergency Diesel Engine has been fired with fuel oil continuously for a period of 120 hours, ExxonMobil Oil Corporation shall conduct testing in accordance with the methodology contained in EPA Method 9. The testing shall occur at fourteen day intervals after the initial 120 hours. The averaging/aggregating period contained in District Rule 400 shall be used to verify compliance with condition number 5. [District Rule 218]
18. No testing is specified for the (Rule 403) particulate matter emission standard from condition number 6. The fuel burning equipment is assumed to be in compliance with the particulate matter emission standard based upon the engineering calculations contained in the evaluation report. If testing is conducted for condition number 6, ExxonMobil Oil Corporation should conduct testing in accordance with the methodology contained in EPA Method 5. [District Rule 218]

19. No testing is specified for the (Rule 404) sulfur concentration limit in condition number 7. The fuel burning equipment is assumed to be in compliance with this sulfur concentration limit based upon the engineering calculations contained in the evaluation report. If testing is conducted for condition number 7, ExxonMobil Oil Corporation should conduct testing in accordance with the methodology contained in EPA Method 6 or CARB Method 100. [District Rule 218]
20. No testing is specified for the (Rule 404) NO<sub>x</sub> (oxides of nitrogen) limit in condition number 8. The fuel burning equipment is assumed to be in compliance with these NO<sub>x</sub> limits based upon the engineering calculations contained in the evaluation report. If testing is conducted for condition number 8, ExxonMobil Oil Corporation should conduct testing in accordance with the methodology contained in EPA Method 7 or CARB Method 100. [District Rule 218]
21. Testing of all fuel oil (for combustion) delivered to the facility shall be conducted prior to or upon receipt of the fuel, or in lieu of testing a manufacturers certification of the sulfur content of the fuel oil shall be supplied at the time of delivery. ExxonMobil Oil Corporation shall conduct testing in accordance with ASTM D1552-83, ASTM D1266-87 or ASTM D2622-87 or shall receive certification as to the sulfur content of the fuel from the manufacturer to verify compliance with condition number 9. [District Rule 218]
22. No testing is specified for the sulfur content of gaseous fuels as long as the only gaseous fuel fired is pipeline quality natural gas. If the facility fires other gaseous fuels, ExxonMobil Oil Corporation shall maintain fuel sulfur content reports to be provided by the fuel supplier or shall conduct testing of all gaseous fuel deliveries in accordance with ASTM D 1072-80, ASTM D 3031-81, ASTM D 3246-81 or SCAQMD Method 307-91 to verify compliance with Condition 10. [District Rule 218]
23. ExxonMobil Oil Corporation shall conduct testing in accordance with SJVUAPCD LBNL-VP (Vapor Pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatography) on an annual basis to determine the true vapor pressure of the crude oil at the actual storage conditions (temperature) in the Storage Tanks to verify compliance with Condition 12. [District Rule 218]

#### **MONITORING AND RECORD KEEPING REQUIREMENTS**

24. ExxonMobil Oil Corporation shall maintain records on the annual amount of crude oil loaded into tank cars, natural gas consumption, and total hours of Thermal Oxidizer operation. [District Rule 207]
25. ExxonMobil Oil Corporation shall operate instrumentation that continuously records the combustion temperature during Thermal Oxidizer operation. [District Rule 207]
26. ExxonMobil Oil Corporation shall maintain a daily log which records the amount and type of solvent containing material consumed in the Laboratory Fume Hood to verify compliance with the usage limit specified in condition 11. [District Rule 416 Adopted 4/20/94]

27. As applicable ExxonMobil Oil Corporation shall maintain the following general records of required monitoring information [District Rule 218]:
- a) the date and time of sampling or measurements;
  - b) the date(s) analyses were performed;
  - c) the company or entity that performed the analyses;
  - d) the analytical techniques or methods used;
  - e) the results of such analyses; and
  - f) the operating conditions existing at the time of sampling or measurement.
28. ExxonMobil Oil Corporation shall maintain records on the occurrence and duration of any startup or shutdown resulting from a malfunction in the operation of the control equipment under this permit. [District Rule 218]
29. ExxonMobil Oil Corporation shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring, sample collection, measurement, report, and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [District Rule 218]

#### REPORTING REQUIREMENTS

30. ExxonMobil Oil Corporation shall report all breakdowns which results in the inability to comply with any emission standard or requirement contained on this permit to the Air Pollution Control Officer (APCO) within 1 hour of the occurrence; this one hour period may be extended up to six hours for good cause by the APCO. The APCO may elect to take no enforcement action if ExxonMobil Oil Corporation demonstrates to the APCO's satisfaction that a breakdown condition exists.

The estimated time for repair of the breakdown shall be supplied to the APCO within 24 hours of the occurrence and a written report shall be supplied to the APCO with 5 days after the occurrence has been corrected. This report shall include at a minimum [District Rule 214]:

- a) a statement that the condition or failure has been corrected and the date of correction; and
  - b) a description of the reasons for the occurrence; and
  - c) a description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future; and
  - d) an estimate of the emissions caused by the condition or failure.
31. ExxonMobil Oil Corporation shall submit semiannual monitoring reports to the District, in a District approved format, no later than August 15 for the period of January 1 through June 30 and no later than February 15 for the period of July 1 through December 31. [District Rule 218]

These monitoring reports shall include at a minimum:

- a) the time intervals, date and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions and preventative measures adopted; and
- b) the averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard for the pollutant in question; and
- c) all information pertaining to any monitoring as required by the permit; and
- d) a negative declaration specifying when no excess emissions occurred.

32. ExxonMobil Oil Corporation shall submit an annual compliance certification report to the District and U.S. EPA, in a District approved format, no later than February 15 for the period of January 1 through December 31 of the preceding year. [District Rule 218]

This report shall include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report and shall include at a minimum:

- a) identification of each term or condition of the permit that is the basis of the certification; and
- b) the compliance status; and
- c) whether compliance was continuous or intermittent; and
- d) the method(s) used for determining the compliance status of the source, currently and over the reporting period.

33. ExxonMobil Oil Corporation shall submit an Emission Statement in accordance with the provisions of Section 182(a)(3)(B)(ii) of the federal Clean Air Act to the District, in a District approved format, no later than April 30 for the period of January 1 through December 31 of the preceding year. [District Rule 300]

#### **GENERAL CONDITIONS**

34. ExxonMobil Oil Corporation shall comply with all conditions of this federal operating permit. Any noncompliance with a permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [District Rule 218]
35. In an enforcement action, the fact that ExxonMobil Oil Corporation would have to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit is not a defense. [District Rule 218]

36. This permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the District. The filing of a request by ExxonMobil Oil Corporation for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 218]
37. This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. [District Rule 218]
38. ExxonMobil Oil Corporation shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, ExxonMobil Oil Corporation shall also furnish to the District copies of records required to be retained by this permit. [District Rule 218]
39. For applicable requirements that will become effective during the permit term, ExxonMobil Oil Corporation shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [District Rule 218]
40. Any document submitted to the District pursuant to this permit shall contain certification by the responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. ExxonMobil Oil Corporation shall promptly, upon discovery, report to the District a material error or omission in these records, reports, plans, or other documents. [District Rule 218]
41. ExxonMobil Oil Corporation shall report any violation of any requirement contained in this permit to the District within 96 hours after such occurrence. The violation report shall include the time intervals, date and magnitude of excess emissions; nature and cause of the excess (if known), corrective actions and preventive measures adopted. [District Rule 218]
42. Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, record keeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with. [District Rule 218]
43. For this federal operating permit to remain valid through the permit term of five years from the date of issuance, ExxonMobil Oil Corporation shall pay an annual emission fee based upon the requirements of District Rule 308. [District Rule 218]
44. ExxonMobil Oil Corporation shall have available at the facility at all times a copy of this federal operating permit. [District Rule 218]
45. For protection from enforcement action based upon an emergency, as defined in District Rule 218, the

responsible official for ExxonMobil Oil Corporation shall submit to the District relevant evidence which demonstrates [District Rule 218]:

- a) an emergency occurred; and
- b) that ExxonMobil Oil Corporation can identify the cause(s) of the emergency; and
- c) that the facility was being properly operated at the time of the emergency; and
- d) that all steps were taken to minimize the emissions resulting from the emergency; and
- e) within two working days of the emergency event, ExxonMobil Oil Corporation provided the District with a description of the emergency and any mitigating or corrective actions taken.

46. Upon presentation of credentials, ExxonMobil Oil Corporation shall allow the District, the ARB, the EPA, or an authorized representative, to perform the following [District Rule 218]:

- a) enter upon the premises where the federal operating permit source is located or in which any records are required to be kept under the terms and conditions of this federal operating permit;
- b) to have access to and copy any records required to be kept under the terms and conditions of this federal operating permit;
- c) to inspect any equipment, operation, or process described or required in this federal operating permit; and,
- d) to sample emissions from the source.

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