



SEP 20 2010

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

Re: **Proposed Authority to Construct / Certificate of Conformity (Minor Mod)**  
**District Facility # C-1077**  
**Project # C-1100182**

Dear Mr. Rios:

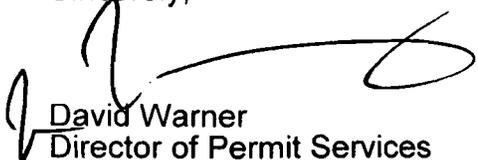
Enclosed for your review is the District's engineering evaluation of an application for Authority to Construct for SFPP, LP, located at 4149 S. Maple Avenue, Fresno, CA, which has been issued a Title V permit. SFPP, LP is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The applicant proposes to install a new 500 gallon fuel additive storage tank with PV valve linked by pipe to the loading rack listed in permit C-1077-51.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authority to Construct # C-1077-53-0 with Certificate of Conformity. After demonstrating compliance with the Authority to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures  
cc: Stanley Tom, Permit Services

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-8000 FAX: (559) 230-8061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-8725  
Tel: 661-392-5500 FAX: 661-392-5585



SEP 20 2010

Donny Homer  
SFPP, LP  
1100 Town and Country Road  
Orange, CA 92868

**Re: Proposed Authority to Construct / Certificate of Conformity (Minor Mod)  
District Facility # C-1077  
Project # C-1100182**

Dear Mr. Homer:

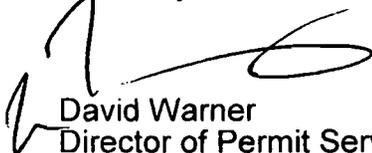
Enclosed for your review is the District's analysis of your application for Authority to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The applicant proposes to install a new 500 gallon fuel additive storage tank with PV valve linked by pipe to the loading rack listed in permit C-1077-51.

After addressing any EPA comments made during the 45-day comment period, the Authority to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures  
cc: Stanley Tom, Permit Services

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

---

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

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

**San Joaquin Valley Air Pollution Control District**  
**Authority to Construct**  
**Application Review**  
Additive Tank

Facility Name: SFPP, LP  
Mailing Address: 1100 Town and Country Road  
Orange, CA 92868  
Contact Person: Donny Homer  
Telephone: (707) 438-2101  
Application #s: C-1077-53-0  
Project #: C-1100182  
Deemed Complete: May 3, 2010

Date: September 7, 2010  
Engineer: Stanley Tom  
Lead Engineer: Joven Refuerzo

---

**I. Proposal**

SFPP, LP is proposing to install a new 500 gallon fixed roof tank to hold various fuel additives at its existing facility, located at 4149 S. Maple Avenue in Fresno, CA. This new tank will be linked by pipe to the loading rack listed in permit C-1077-51.

SFPP has received their Title V Permit. This modification can be classified as a Title V minor modification pursuant to Rule 2520, Section 3.20, and can be processed with a Certificate of Conformity (COC). The facility has requested a COC be issued with this project, therefore SFPP will be required to submit a Title V administrative amendment application prior to operating under the revised provisions of the ATC issued with this project.

**II. Applicable Rules**

Rule 2201 New and Modified Stationary Source Review Rule (9/21/06)  
Rule 2520 Federally Mandated Operating Permits (6/21/01)  
Rule 4001 New Source Performance Standards (4/14/99)  
Rule 4101 Visible Emissions (2/17/05)  
Rule 4102 Nuisance (12/17/92)  
Rule 4623 Storage of Organic Liquids (5/19/05)  
CH&SC 41700 Health Risk Assessment  
CH&SC 42301.6 School Notice  
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)  
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

### **III. Project Location**

The facility is located at 4149 S. Maple Avenue in Fresno, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

### **IV. Process Description**

SFPP is a pipeline transfer station that transports fuel from local refineries, and then makes the fuel accessible for truck loading to be delivered to retail gasoline dispensing facilities. The facility is composed of a large tank farm to store transported fuel, and loading racks for fuel trucks to load fuels for delivery.

### **V. Equipment Listing**

#### **C-1077-53-0**

500 GALLON FUEL ADDITIVE STORAGE TANK WITH PV VALVE LINKED BY PIPE TO LOADING RACK LISTED IN PERMIT C-1077-51

### **VI. Emission Control Technology Evaluation**

All VOC emissions at this facility from loading rack operation are collected and controlled by a vapor collection system equipped with a 78.0 MMBtu/hr John Zink thermal oxidizer (enclosed ground flare permit C-1077-3).

### **VII. General Calculations**

#### **A. Assumptions**

- Facility may operate 24 hours per day, 365 days per year (worst-case)
- Maximum vapor pressure = 0.4 psia (per applicant)
- Daily throughput = 500 gallons per day (per applicant)
- Annual throughput = 6,000 gallons per year (per applicant)
- All vapors from the loading racks are collected and controlled by the John Zink flare listed under C-1077-3
- VOC emissions from the loading racks are taken into account under permit unit C-1077-3, therefore emissions from the racks themselves are considered zero for calculation purposes.

#### **B. Emission Factors**

Emissions from this tank are calculated using US EPA's TANKS 4.0 program, see Appendix A.

## **C. Calculations**

### **1. Pre-Project Potential to Emit (PE1)**

C-1077-53-0

Since this is a new emissions unit, PE1 = 0 for all pollutants.

### **2. Post Project Potential to Emit (PE2)**

C-1077-53-0

Daily PE2 = 0.49 lb-VOC/day → 0 lb-VOC/day\*

Annual PE2 = 10 lb-VOC/year → 0 lb-VOC/year\*

\* Per District Policy APR 1130, District policy is to consider an IPE of less than 0.5 lb/day to be rounded to zero for the purposes of triggering NSR requirements and therefore the requirements are not triggered. However, to minimize rounding errors, DELs, SSPE, PE and all other associated figures will be reflected in the EE and the permits without setting a daily increase in emissions of less than 0.5 lb/day to zero.

### **3. Pre-Project Stationary Source Potential to Emit (SSPE1)**

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Facility emissions are already above the Offset and Major Source Thresholds for VOC emissions, and there are no increases proposed for the other criteria pollutants; therefore, SSPE1 calculations are not necessary.

### **4. Post Project Stationary Source Potential to Emit (SSPE2)**

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Facility emissions are already above the Offset and Major Source Thresholds for VOC emissions, and there are no increases proposed for the other criteria pollutants; therefore, SSPE2 calculations are not necessary.

## 5. Major Source Determination

Pursuant to Section 3.24 of District Rule 2201, a Major Source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.24.2 states, "for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site."

This source is an existing Major Source for VOC emissions and will remain a Major Source for VOC. No change in other criteria pollutants are proposed or expected as a result of this project.

## 6. Baseline Emissions (BE)

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22

C-1077-53-0

Since this is a new emissions unit, BE = PE1 = 0 for all pollutants.

## 7. Major Modification

Major Modification is defined in 40 CFR Part 51.165 as "*any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.*"

As discussed in Section VII.C.5 above, the facility is an existing Major Source for VOC; however, the project by itself would need to be a significant increase in order to trigger a Major Modification. The emissions unit within this project does not have a total potential to emit which is greater than Major Modification thresholds (see table below). Therefore, the project cannot be a significant increase and the project does not constitute a Major Modification.

<b>Major Modification Thresholds (Existing Major Source)</b>			
<b>Pollutant</b>	<b>Project PE (lb/year)</b>	<b>Threshold (lb/year)</b>	<b>Major Modification?</b>
NO <sub>x</sub>	0	50,000	No
SO <sub>x</sub>	0	80,000	No
PM <sub>10</sub>	0	30,000	No
VOC	10	50,000	No

### **8. Federal Major Modification**

As shown above, this project does not constitute a Major Modification. Therefore, in accordance with District Rule 2201, Section 3.17, this project does not constitute a Federal Major Modification and no further discussion is required.

### **9. Quarterly Net Emissions Change (QNEC)**

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix B.

## **VIII. Compliance**

### **Rule 2201 New and Modified Stationary Source Review Rule**

#### **A. Best Available Control Technology (BACT)**

##### **1. BACT Applicability**

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following\*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

\*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

**a. New emissions units – PE > 2 lb/day**

As seen in Section VII.C.2 of this evaluation, the applicant is proposing to install a new tank with a PE less than 2 lb/day for VOC. BACT is not triggered for VOC since the PE is less than 2 lbs/day.

**b. Relocation of emissions units – PE > 2 lb/day**

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

**c. Modification of emissions units – AIPE > 2 lb/day**

As discussed in Section I above, there are no modified emissions units associated with this project; therefore BACT is not triggered.

**d. Major Modification**

As discussed in Section VII.C.7 above, this project does not constitute a Major Modification; therefore BACT is not triggered.

**B. Offsets**

**1. Offset Applicability**

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offsets will be required for this project.

<b>Offset Determination (lb/year)</b>					
	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>CO</b>	<b>VOC</b>
<b>Post Project SSPE (SSPE2)</b>	N.C.	N.C.	N.C.	N.C.	> 20,000
<b>Offset Threshold</b>	20,000	54,750	29,200	200,000	20,000
<b>Offsets triggered</b>	N/A	N/A	N/A	N/A	Yes

N.C. = not calculated

**2. Quantity of Offsets Required**

VOC is the only pollutant of concern in this project. Therefore, calculations for only VOC emissions are required.

Per Sections 4.7.1 and 4.7.3, the quantity of offsets in pounds per year for VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) =  $(\Sigma[PE2 - BE] + ICCE) \times DOR$ , for all new or modified emissions units in the project,

Where,

PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE)

As calculated in Section VII.C.6 above, the Baseline Emissions (BE) from the new emissions unit are zero.

There are no increases in cargo carrier emissions; therefore offsets can be determined as follows:

Offsets Required (lb/year) =  $([PE2 - BE]_{\text{additive tank}} + ICCE) \times DOR$

Offsets Required (lb/year) =  $([0 - 0] + 0) \times DOR$   
=  $0 \times \text{lb VOC/year} \times DOR$

\* Per District Policy APR 1130, District policy is to consider an IPE of less than 0.5 lb/day to be rounded to zero for the purposes of triggering NSR requirements. Therefore, offsets are not required for this project.

## C. Public Notification

### 1. Applicability

Public noticing is required for:

- a. Any new Major Source, which is a new facility that is also a Major Source,
- b. Major Modifications,
- c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- d. Any project which results in the offset thresholds being surpassed, and/or
- e. Any project with an SSPE of greater than 20,000 lb/year for any pollutant.

**a. New Major Source**

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

**b. Major Modification**

As demonstrated in VII.C.7, this project does not constitute a Major Modification; therefore, public noticing for Major Modification purposes is not required.

**c. PE > 100 lb/day**

Applications which include a new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

**d. Offset Threshold**

The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

Offset Threshold				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required
NO <sub>x</sub>	N.C.	N.C.	20,000 lb/year	No
SO <sub>x</sub>	N.C.	N.C.	54,750 lb/year	No
PM <sub>10</sub>	N.C.	N.C.	29,200 lb/year	No
CO	N.C.	N.C.	200,000 lb/year	No
VOC	> 20,000	> 20,000	20,000 lb/year	No

N.C. = not calculated

As detailed above, there were no thresholds *surpassed* with this project; therefore public noticing is not required for offset purposes.

**e. SSIPE > 20,000 lb/year**

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e. SSIPE = SSPE2 – SSPE1. The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and

4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

<b>Stationary Source Increase in Permitted Emissions [SSIPE] – Public Notice</b>					
<b>Pollutant</b>	<b>PE2 (lb/year)</b>	<b>PE1 (lb/year)</b>	<b>SSIPE (lb/year)</b>	<b>SSIPE Public Notice Threshold</b>	<b>Public Notice Required</b>
NO <sub>x</sub>	0	0	0	20,000 lb/year	No
SO <sub>x</sub>	0	0	0	20,000 lb/year	No
PM <sub>10</sub>	0	0	0	20,000 lb/year	No
CO	0	0	0	20,000 lb/year	No
VOC	10	0	10	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

## 2. Public Notice Action

As discussed above, this project will not result in emissions, for any criteria pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

## D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

### C-1077-53-0

- Emissions from this tank shall not exceed 0.5 lb VOC per day. [District Rule 2201]
- Daily throughput of this tank shall not exceed 500 gallons per day. [District Rule 2201]
- This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.4 psia under all storage conditions. [District Rule 2201]

## E. Compliance Assurance

### 1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

## **2. Monitoring**

No monitoring is required to demonstrate compliance with Rule 2201. Monitoring as required by the applicable prohibitory rules is discussed below.

## **3. Recordkeeping**

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following condition will appear on the permit to operate:

The following condition will be placed on the tank permit:

- Permittee shall maintain daily records of organic liquid throughput and shall keep accurate records of each organic liquid stored in the tank, including its storage temperature and TVP. [District Rule 1070]
- 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 1070]

## **4. Reporting**

No reporting is required to demonstrate compliance with Rule 2201.

### **Rule 2520 Federally Mandated Operating Permits**

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit pursuant to Section 3.20 of this rule. As discussed above, the facility has applied for a Certificate of Conformity (COC) (see Appendix E); therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected.

### **Rule 4001 New Source Performance Standards (NSPS)**

This rule incorporates the New Source Performance Standards from 40 CFR Part 60. 40 CFR Part 60, Subpart Kb could potentially apply to the storage tank in this project. However, pursuant to 40 CFR 60.110 (a), this subpart applies to storage vessels less than 75 cubic meters (19,812 gallons), that is used to store volatile organic liquids for which construction, reconstruction, or modification commenced after July 23, 1984.

The storage vessel in this project is less than 75 cubic meters. Therefore, the requirements of this subpart are not applicable to this project.

**Rule 4101 Visible Emissions**

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). Since the only pollutant of concern from the new tank is VOC, compliance with this rule is expected.

**Rule 4102 Nuisance**

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

**California Health & Safety Code 41700 (Health Risk Assessment)**

District Policy APR 1905 – Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (Appendix C, the total facility prioritization score including this project was greater than one. Therefore, a health risk assessment was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
C-1077-53	2.10 E-14	No

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 10 in a million). As outlined by the HRA Summary in Appendix C of this report, the emissions increases for this project was determined to be less than significant.

**Rule 4623 Storage of Organic Liquids**

This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is placed, held, or stored.

This rule does not apply to this tank since its storage capacity is less than 1,100 gallons.

### **California Health & Safety Code 42301.6 (School Notice)**

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

### **California Environmental Quality Act (CEQA)**

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

### **Greenhouse Gas (GHG) Significance Determination**

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project. The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The additive being stored in the tank in this project does not contain any greenhouse gases. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

### **District CEQA Findings**

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

**IX. Recommendation**

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct C-1077-53-0 subject to the permit conditions on the attached draft Authority to Construct in Appendix D.

**X. Billing Information**

<b>Annual Permit Fees</b>			
<b>Permit Number</b>	<b>Fee Schedule</b>	<b>Fee Description</b>	<b>Annual Fee</b>
C-1077-53-0	3020-05-A	500 gallons	\$75

**Appendices**

- A: TANKS 4.0 Summary
- B: Quarterly Net Emissions Change
- C: HRA Summary
- D: Draft ATC
- E: Certificate of Conformity

**APPENDIX A**  
**TANKS 4.0 Summary**

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Tank Identification and Physical Characteristics**

**Identification**

User Identification:	Additive Tank Max DEL Run
City:	
State:	
Company:	
Type of Tank:	Vertical Fixed Roof Tank
Description:	

**Tank Dimensions**

Shell Height (ft):	6.00
Diameter (ft):	4.00
Liquid Height (ft) :	6.00
Avg. Liquid Height (ft):	3.00
Volume (gallons):	564.02
Turnovers:	27.48
Net Throughput(gal/yr):	15,500.00
Is Tank Heated (y/n):	N

**Paint Characteristics**

Shell Color/Shade:	White/White
Shell Condition:	Good
Roof Color/Shade:	White/White
Roof Condition:	Good

**Roof Characteristics**

Type:	Cone
Height (ft)	0.00
Slope (ft/ft) (Cone Roof)	0.06

**Breather Vent Settings**

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meteorological Data used in Emissions Calculations: Fresno, California (Avg Atmospheric Pressure = 14.56 psia)

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Liquid Contents of Storage Tank**

**Additive Tank Max DEL Run - Vertical Fixed Roof Tank**

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Fresno 0.4	Jul	74.89	65.82	83.95	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP70 = .4 VP80 * .4

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Detail Calculations (AP-42)**

**Additive Tank Max DEL Run - Vertical Fixed Roof Tank**

Month:	January	February	March	April	May	June	July	August	September	October	November	December
Standing Losses (lb):							0.4937					
Vapor Space Volume (cu ft):							38.2227					
Vapor Density (lb/cu ft):							0.0070					
Vapor Space Expansion Factor:							0.0636					
Vented Vapor Saturation Factor:							0.9394					
Tank Vapor Space Volume:												
Vapor Space Volume (cu ft):							38.2227					
Tank Diameter (ft):							4.0000					
Vapor Space Outage (ft):							3.0417					
Tank Shell Height (ft):							6.0000					
Average Liquid Height (ft):							3.0000					
Roof Outage (ft):							0.0417					
Roof Outage (Cone Roof)												
Roof Outage (ft):							0.0417					
Roof Height (ft):							0.0000					
Roof Slope (ft/ft):							0.0625					
Shell Radius (ft):							2.0000					
Vapor Density												
Vapor Density (lb/cu ft):							0.0070					
Vapor Molecular Weight (lb/lb-mole):							100.0000					
Vapor Pressure at Daily Average Liquid												
Surface Temperature (psia):							0.4000					
Daily Avg. Liquid Surface Temp. (deg. R):							534.5558					
Daily Average Ambient Temp. (deg. F):							81.8500					
Ideal Gas Constant R												
(psia cu ft / (lb-mol-deg R)):							10.731					
Liquid Bulk Temperature (deg. R):							522.9650					
Tank Paint Solar Absorptance (Shell):							0.1700					
Tank Paint Solar Absorptance (Roof):							0.1700					
Daily Total Solar Insulation												
Factor (Btu/sq ft day):							2,551.4853					
Vapor Space Expansion Factor												
Vapor Space Expansion Factor:							0.0636					
Daily Vapor Temperature Range (deg. R):							36.2651					
Daily Vapor Pressure Range (psia):							0.0000					
Breather Vent Press. Setting Range (psia):							0.0600					
Vapor Pressure at Daily Average Liquid												
Surface Temperature (psia):							0.4000					
Vapor Pressure at Daily Minimum Liquid												
Surface Temperature (psia):							0.4000					
Vapor Pressure at Daily Maximum Liquid												
Surface Temperature (psia):							0.4000					
Daily Avg. Liquid Surface Temp. (deg R):							534.5558					
Daily Min. Liquid Surface Temp. (deg R):							525.4896					
Daily Max. Liquid Surface Temp. (deg R):							543.6221					
Daily Ambient Temp. Range (deg. R):							33.5000					
Vented Vapor Saturation Factor												
Vented Vapor Saturation Factor:							0.9394					
Vapor Pressure at Daily Average Liquid												
Surface Temperature (psia):							0.4000					
Vapor Space Outage (ft):							3.0417					
Working Losses (lb):							14.7619					
Vapor Molecular Weight (lb/lb-mole):							100.0000					
Vapor Pressure at Daily Average Liquid												
Surface Temperature (psia):							0.4000					
Net Throughput (gal/mo.):							15,500.0000					
Annual Turnovers:							27.4813					

Turnover Factor:	1.0000
Maximum Liquid Volume (gal):	564.0197
Maximum Liquid Height (ft):	6.0000
Tank Diameter (ft):	4.0000
Working Loss Product Factor:	1.0000
Total Losses (lb):	15.2556

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Individual Tank Emission Totals**

**Emissions Report for: July**

**Additive Tank Max DEL Run - Vertical Fixed Roof Tank**

Components	Losses(lbs)		
	Working Loss	Breathing Loss	Total Emissions
Fresno 0.4	14.76	0.49	15.26

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Tank Identification and Physical Characteristics**

**Identification**

User Identification:	Additive Tank
City:	
State:	
Company:	
Type of Tank:	Vertical Fixed Roof Tank
Description:	

**Tank Dimensions**

Shell Height (ft):	6.00
Diameter (ft):	4.00
Liquid Height (ft) :	6.00
Avg. Liquid Height (ft):	3.00
Volume (gallons):	564.02
Turnovers:	10.64
Net Throughput(gal/yr):	6,000.00
Is Tank Heated (y/n):	N

**Paint Characteristics**

Shell Color/Shade:	White/White
Shell Condition	Good
Roof Color/Shade:	White/White
Roof Condition:	Good

**Roof Characteristics**

Type:	Cone
Height (ft)	0.00
Slope (ft/ft) (Cone Roof)	0.06

**Breather Vent Settings**

Vacuum Settings (psig):	-0.03
Pressure Settings (psig)	0.03

Meteorological Data used in Emissions Calculations: Fresno, California (Avg Atmospheric Pressure = 14.56 psia)

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Liquid Contents of Storage Tank**

**Additive Tank - Vertical Fixed Roof Tank**

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
Fresno 0.4	Jan	56.47	52.67	60.27	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP50 = .4 VP60 = .4
Fresno 0.4	Feb	59.30	54.27	64.33	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP50 = .4 VP60 = .4
Fresno 0.4	Mar	61.64	55.70	67.59	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP60 = .4 VP70 = .4
Fresno 0.4	Apr	65.05	57.67	72.42	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP60 = .4 VP70 = .4
Fresno 0.4	May	68.99	60.66	77.33	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP60 = .4 VP70 = .4
Fresno 0.4	Jun	72.57	63.71	81.44	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP70 = .4 VP80 = .4
Fresno 0.4	Jul	74.89	65.82	83.95	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP70 = .4 VP80 = .4
Fresno 0.4	Aug	73.82	65.18	82.45	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP70 = .4 VP80 = .4
Fresno 0.4	Sep	70.70	62.85	78.55	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP70 = .4 VP80 = .4
Fresno 0.4	Oct	65.97	59.12	72.82	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP60 = .4 VP70 = .4
Fresno 0.4	Nov	60.17	55.16	65.18	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP60 = .4 VP70 = .4
Fresno 0.4	Dec	56.22	52.52	59.91	63.30	0.4000	0.4000	0.4000	100.0000			100.00	Option 1: VP50 = .4 VP60 = .4



Turnover Factor:	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
Maximum Liquid Volume (gal):	564.0197	564.0197	564.0197	564.0197	564.0197	564.0197	564.0197	564.0197	564.0197	564.0197	564.0197	564.0197
Maximum Liquid Height (ft):	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000	6.0000
Tank Diameter (ft):	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000	4.0000
Working Loss Product Factor:	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000
<b>Total Losses (lb):</b>	<b>0.6789</b>	<b>0.7257</b>	<b>0.8057</b>	<b>0.8740</b>	<b>0.9379</b>	<b>0.9470</b>	<b>0.9699</b>	<b>0.9468</b>	<b>0.8922</b>	<b>0.8542</b>	<b>0.7412</b>	<b>0.6724</b>

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Individual Tank Emission Totals**

**Emissions Report for: Annual**

**Additive Tank - Vertical Fixed Roof Tank**

Components	Losses(lbs)		
	Working Loss	Breathing Loss	Total Emissions
Fresno 0.4	5.71	4.33	10.05

**APPENDIX B**  
**Quarterly Net Emissions Change**

### Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - BE, where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
- PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
- BE = Baseline Emissions (per Rule 2201) for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above, quarterly PE2 and quarterly BE can be calculated as follows:

C-1077-53-0

$$\begin{aligned} PE2_{\text{quarterly}} &= PE2_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 10 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 2.5 \text{ lb VOC/qtr} \end{aligned}$$

$$\begin{aligned} BE_{\text{quarterly}} &= BE_{\text{annual}} \div 4 \text{ quarters/year} \\ &= 0 \text{ lb/year} \div 4 \text{ qtr/year} \\ &= 0 \text{ lb VOC/qtr} \end{aligned}$$

Quarterly NEC [QNEC]			
	PE2 (lb/qtr)	BE (lb/qtr)	NEC (lb/qtr)
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	0	0	0
CO	0	0	0
VOC	2.5	0	2.5

**APPENDIX C**  
**HRA Summary**

# San Joaquin Valley Air Pollution Control District Risk Management Review

To: Stanley Tom – Permit Services  
 From: Cheryl Lawler – Technical Services  
 Date: September 3, 2010  
 Facility Name: SFPP, LP  
 Location: 4149 S. Maple Avenue, Fresno  
 Application #(s): C-1077-53-0  
 Project #: C-1100182

## A. RMR SUMMARY

RMR Summary			
Categories	Fuel Additive Storage Tank (Unit 53-0)	Project Totals	Facility Totals
Prioritization Score	0.00	0.00	>1
Acute Hazard Index	0.00	0.00	0.01
Chronic Hazard Index	0.00	0.00	0.01
Maximum Individual Cancer Risk	2.10E-14	2.10E-14	1.82E-06
T-BACT Required?	No		
Special Permit Conditions?	No		

### I. Project Description

Technical Services received a request on August 19, 2010, to perform a Risk Management Review for a new 500 gallon fuel additive storage tank.

### II. Analysis

Toxic emissions were calculated using VOC emission rates supplied by the processing engineer, after reviewing the additives' MSDS sheets in order to determine the speciation of Hazardous Air Pollutants (HAPs) found in the products. In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905-1, March 2, 2001), risks from the project were prioritized using the procedures in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEART's database. The prioritization score for the project was less than 1.0 (see RMR Summary Table); however, the facility's combined prioritization scores totaled to greater than one. Therefore, a refined Health Risk Assessment was required and performed for the project. AERMOD was used with area source parameters outlined below and concatenated 5-year meteorological data from Fresno to determine maximum dispersion factors at the nearest residential and business receptors. The dispersion factors were input into the HARP model to calculate the Chronic and Acute Hazard Indices and the Carcinogenic Risk.

The following parameters were used for the review:

<b>Analysis Parameters</b>			
<b>Source Type</b>	<b>Area</b>	<b>Closest Receptor (m)</b>	128.02
<b>Length of Sides</b>	4 ft	<b>Type of Receptor</b>	Business
<b>Release Height</b>	6 ft	<b>Location Type</b>	Rural

### **III. Conclusions**

The acute and chronic indices are below 1.0; and the maximum individual cancer risk associated with the project is **2.10E-14**, which is less than the 1 in a million threshold. In accordance with the District's Risk Management Policy, the project is approved **without** Toxic Best Available Control Technology (T-BACT).

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

**APPENDIX D**  
**Draft ATC**

**San Joaquin Valley  
Air Pollution Control District**

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**  
**DRAFT**

**PERMIT NO:** C-1077-53-0

**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:**  
500 GALLON FUEL ADDITIVE STORAGE TANK WITH PV VALVE LINKED BY PIPE TO LOADING RACK LISTED IN PERMIT C-1077-51

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District NSR Rule] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. The tank shall be equipped with a fixed roof with no holes or openings. [District Rule 2201]
6. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.4 psia under all storage conditions. [District Rule 2201]
7. This tank shall be equipped with a pressure-vacuum (PV) relief valve set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly 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 2201]

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

**DRAFT**

DAVID WARNER, Director of Permit Services

C-1077-53-0: Sep 14 2010 1:56PM - TOMS : Joint Inspection NOT Required

8. This tank shall be in a leak-free condition. A leak-free 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. [District Rule 2201]
9. Daily throughput of this tank shall not exceed 500 gallons per day. [District Rule 2201]
10. Annual throughput of this tank shall not exceed 6,000 gallons per year. [District Rule 2201]
11. VOC emission rate from the tank shall not exceed 0.5 lb/day. [District Rule 2201]
12. Permittee shall maintain daily records of organic liquid throughput and shall keep accurate records of each organic liquid stored in the tank, including its storage temperature and TVP. [District Rule 1070]
13. 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 1070]

DRAFT

**APPENDIX E**  
**Certificate of Conformity**

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

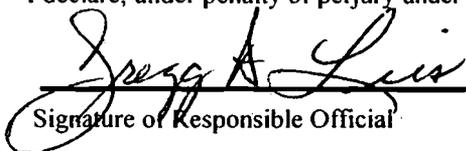
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE  
 MINOR PERMIT MODIFICATION                                       AMENDMENT

COMPANY NAME: SFPP, L.P. – Fresno Terminal	FACILITY ID: C – 1077
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: SFPP, L.P. – Fresno Terminal	
3. Agent to the Owner: N/A	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

  
\_\_\_\_\_  
Signature of Responsible Official

1/12/10  
\_\_\_\_\_  
Date

Gregg A. Lies

\_\_\_\_\_  
Name of Responsible Official (please print)

Director of Operations

\_\_\_\_\_  
Title of Responsible Official (please print)