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<i>ENGINEERING AND COMPLIANCE DIVISION</i> <i>Refinery & Waste Management Permitting</i>	A/N 549850 & 852	Date 6/24/13
CHEVRON USA, INC VAN NUYS TERMINAL	Processed by TL03	Checked by <i>COY</i>

EVALUATION FOR A
PERMIT TO CONSTRUCT/OPERATE
A PETROLEUM STORAGE TANK

COMPANY NAME AND LOCATION ADDRESS

Chevron USA, Inc. (Van Nuys Terminal)
15359 Oxnard Street
Van Nuys, CA 91411

Facility ID# 2526

APPLICATIONS & DESCRIPTION

A/N 549850

Modification to Fixed Roof Storage Petroleum Storage Tank No. 2

(See draft permit for detailed equipment description).

A/N 549852

Title V Revision Application

BACKGROUND

Chevron USA, Inc. operates a petroleum product storage and distribution facility (known as the Van Nuys Terminal or VNT) located in Van Nuys, CA. The VNT is a Title V facility which operates, under AQMD permits, five storage tanks, four tank truck loading islands, a liquid recovery lift station system, and a vapor recovery system (carbon adsorption system). The carbon adsorption system controls and recovers gasoline vapors (VOC) that are displaced during the tank truck loading operations at the four permitted bulk loading islands. Four fixed roof storage tanks are also vented to the vapor recovery system.

Chevron has submitted this application (A/N 549852) to add an emergency manway/vent to one of their fixed roof storage tanks (Tank No. 2). No other changes have been requested.



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NOV/NC HISTORY

Two Notices of Violation (NOV) were issued to the VNT in the last two years. The first was issued in September of 2012 for failure to perform tank inspections twice per year on one of the storage tanks at the facility. The second was issued in May of 2013 for failing to perform daily calibrations on the Continuous Monitoring System (CMS) as required by their Rule 462 CMS Plan. Both of these issues have been corrected and the facility has been in on-going compliance with these matters since the issuance of the respective NOV's.

PROCESS DESCRIPTION

Tank No. 2 is a fixed roof storage tank allowed to store petroleum distillates and gasoline blending components including oxygenates and is vented to a vapor recovery system (carbon adsorber) as are three other fixed roof storage tanks. Tank No. 2 primarily stores gasoline which is received via pipeline. The stored gasoline is then fed to the bulk loading islands where it is blended with denatured ethanol (oxygenate) and loaded into tank trucks for further distribution to the marketplace. The displaced vapors from the loading of the tank trucks is also vented to the very same vapor recovery system.

EQUIPMENT CONSTRUCTION/MODIFICATIONS & ASSOCIATED EMISSIONS

Chevron has proposed to modify Tank No. 2 by installing manway/emergency vent on the roof of the tank. The manway/emergency vent is 24 inches in diameter and will only be used for emergency situations. Since it is only used for emergencies, and coupled with the fact that the EPA Tanks 4.09d program has no such fitting selection to account for emissions. It is therefore concluded that any emission increases as a result of this modification are negligible and will be assumed to be zero. Therefore, the PTE remains unchanged and the current permit's PTE data will still represent the maximum emissions for Tank No. 2. In reviewing the permit file history for Tank No. 2, it indicates that its PTE as shown in the NSR application query is as follows:

ROG = .21 lbs/hr = 5.04 lbs/d = R1 = R2.



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Toxic Emissions

There is no increase in emissions of VOC and thus no increase is expected for any toxic compounds.

ADDITIONAL CHANGES

In addition to including the manway/emergency vent as a part of the storage tank's equipment description, a clarification will be made designating the 8700 BBL capacity as being the nominal storage capacity of Tank No. 2. Furthermore, one condition will be added and three conditions will be updated. The added condition (Condition No. 6) will be a one year Permit To Construct/Operate expiration condition. The updated conditions will be to include "construction" in Condition No. 1, and to add a Rule 1313(g) rule tag for the commodity/vapor pressure condition and the throughput condition (Condition Nos. 3 and 4 respectively).

RULES EVALUATION

Rule 212

There is no increase in emissions or MICR and there are no schools within 1000 feet; therefore, no public notice is required.

Rule 401

Visible emissions are not expected under proper operation of this equipment.

Rule 402

No nuisance complaints are expected with proper operation of the equipment.

Rule 463

Fixed roof Tank No. 2 contains higher vapor pressure products and is vented to vapor recovery as required by this rule. Continued compliance is expected.



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Rule 466/466.1

Facility is required to comply with these rules as the rules are currently listed as applicable Section K the Title V permit for this facility. Continued compliance is expected.

Rule 1149

Facility expected to comply with degassing requirements of this rule as applicable and is required by existing permit condition.

Rule 1173

This rule not applicable to this facility but portions of it may apply in so much as they are included in other conditions that are imposed and tagged as BACT for other equipment at this facility.

Rule 1178

This facility has not reported emissions in AER greater than 20 tons per year, therefore this rule is not applicable.

Reg. XIII

There are no emission increases associated with this modification, therefore, BACT, Offsets, and Modeling are not required. The facility is currently in compliance with all applicable rules and regulations of the District and thus meets the requirements of 1303(b)(4).

Rule 1401

There are no increases in toxic emissions from this modification therefore this rule is not applicable.

Regulation XX

This facility is not a RECLAIM facility.



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Regulation XXX

This facility is a Title V facility and the project has no emission increases, therefore it will be sent to EPA for 45-day review as a minor permit revision.

CEQA

The CEQA Applicability Form (400-CEQA) indicates that the project does not have any impacts which trigger the preparation of a CEQA document.

40CFR6 60 Subpart K_b

There is not emission increase as a result of this modification, therefore the modified tank is not subject to this NSPS.

40CFR 63 Subpart R (Gasoline Distribution MACT)

This facility is not a major source of HAPs and is thus only subject to the minor source requirements (recordkeeping) of this Subpart as stated in the facility-wide condition in Section D with supporting conditions in Section J of Title V permit. Continued compliance is expected.

40CFR 63 Subpart BBBBBB (Gasoline Distribution GACT)

As a minor source under Subpart R, this facility is required to comply with this Subpart as required by a facility-wide condition in Section D with supporting conditions in Section J of Title V permit. Continued compliance is expected.

40CFR 63 Subpart EEEE (Organic Liquids Distribution MACT)

This facility is not a major source of HAPs and is not subject to this NESHAP.



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RECOMMENDATIONS

Propose the modification of Tank No. 2 to EPA for 45-day review as a minor permit revision (see sample permit) prior to issuing aPC-PO in Section D of Title V Facility Permit.