San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

June 19, 2015

Mr. Greg Smith
Chevron USA Products Company
22888 S Kasson Road
Tracy, CA 95376

Re: Notice of Minor Title V Permit Modification
District Facility # N-199
Project # N-1151933

Dear Mr. Smith:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to modify Permit to Operate (PTO) N-199-8-4 of the facility's current Title V operating permit. The proposed project is to amend the condition requiring monitoring and recordkeeping of pressure in delivery tanks being loaded at the loading rack of the bulk terminal.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO N-199-8-5, application, and previous Title V permit. This project will be finalized after the 45-day EPA comment period.

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

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

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

www.valleyair.org www.healthyairliving.com

Printed on recycled paper.

Title V APPLICATION REVIEW
Minor Modification

Facility Number:	N-199
Facility Name:	Chevron USA Products Company
Mailing Address:	22888 S Kasson Road Tracy, CA 95376
Contact Name:	Greg Smith
Phone:	(209) 829-5061
Responsible Official:	Curtis Aman
Title:	Terminal Manager
Processing Staff:	Jag Kahlon
Project Number:	N-1151933
Date:	June 17, 2015

I. PROPOSAL

During Chevron's latest Title V renewal, the underlined changes were made to one of the requirements in permit N-199-8 for the loading rack without thoroughly explaining the basis for including such requirement.

- Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. The pressure in the delivery tank being loaded shall be monitored and recorded at least once every 15 minutes. [District Rule 4624, 5.2 4and ~~County Rule 412 (Stanislaus)~~ 40 CFR Part 64]

Chevron has requested the District to re-evaluate the underlined changes by thoroughly investigating the intent of the requirement and to determine if their existing set-up satisfies the intent of those requirements.

The District found that the underlined changes should not have been made during the Title V renewal. The intent of the requirements is to operate the vapor recovery system in a way to not exceed the pressure in cargo tanks above the Air Resource Board's (ARB) cargo tank certification limit. Chevron's existing setup triggers warning alarms and pump auto shutoff should the vapor recovery system malfunction and exceeds vapor line pressure above the limits in the permit. Moreover, monitoring and recording of the pressure will not have any impact on the performance of existing vapor recovery unit (VRU) and its continuous emissions monitoring system (CMS) under permit N-199-5. Therefore, this requirement has been revised in the following manner, and the proposed project is treated as a minor modification:

- Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. ~~The pressure in the delivery tank being loaded shall be monitored and recorded at least once every 15 minutes~~. The pressure in the vapor line connected to the delivery tank shall be continuously monitored during each loading, and recorded at least once a day on the days when operator is present on the site. [District Rule 4624, 5.4 ~~and 40 CFR 64~~]

Details on Chevron's set-up, basis of the requirement, and conclusion are presented in the following section:

Chevron's set-up:
Chevron operates a bulk terminal, where they load cargo tanker trucks with unleaded gasoline, and dispatch them to various gas stations. Gasoline vapors displaced during loading process are captured by the VRU operated under permit N-199-5. The VRU is equipped with a CMS to monitor and record the hydrocarbons released into the atmosphere to ensure on-going compliance with the permitted limit. The vapor recovery line of the VRU has a Magnehelic gauge that continuously monitors the vapor pressure in the line. This gauge triggers alarms and auto shutoff of the loading pump in case the pressure reaches the pressure limits specified in the requirement. Specifically, the warning alarm turns ON when the pressure exceeds 11 inches of water column, and trigger auto shutoff of the loading pump when the pressure exceeds 15 inches of water column. The gauge is not equipped to record pressure at the frequency specified in the permit.

Basis of the requirement:
Section 5.4 of Rule 4624 requires the facility to operate vapor collection and control system such that the pressure in the delivery tank being loaded does not exceed 18 inches of water column pressure (0.65 psi) and 6 inches water column vacuum (0.2 psi). The intent of the requirement is to prevent pressure exceedance in a cargo tank due to malfunction of loading or vapor recovery and control system over the leak-tightness pressure test certification level of the cargo tank required by the ARB.

Conclusion:
Chevron's existing monitoring set-up with warning alarm and auto pump shutoff system satisfies the intent of the requirement, and it was unnecessary to record vapor line pressure at least every 15-minutes, in addition to monitoring and recordkeeping of CMS under permit N-199-5. Therefore, this condition is recommended to be revised as shown in the proposal section.

The proposed project is considered a "Minor Modification" based on the fact that Chevron's set up complies with the intent of the requirements and it was unnecessary to require recording of the pressure at the frequency specified in the

condition during Title V renewal. Moreover, monitoring and recording of pressure in the vapor line does not affect the performance of VRU and its CMS system. Note that the CMS satisfies the requirements under 40 CFR Part 64 – Compliance Assurance Monitoring (CAM).

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for permit requirements.

II. FACILITY LOCATION

This facility is located at 22888 S. Kasson Road, Tracy, California.

III. EQUIPMENT DESCRIPTION

N-199-8-5
LOADING RACK (UNLEADED GASOLINE AND TRANSMIX)

IV. SCOPE OF EPA AND PUBLIC REVIEW

As explained in the proposal section, this project is considered a Minor Modification. Therefore, public review is not required for this project.

V. APPLICABLE REQUIREMENTS

Rule 2520 Federally Mandated Operating Permits (6/21/01)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

CONDITION 9 IN PERMIT N-199-8-4

- Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. The pressure in the delivery tank being loaded shall be monitored and recorded at least once every 15 minutes. [District Rule 4624, 5.4 and 40 CFR 64]

Based on the discussion in the proposal section, this condition has been revised and stated in the following manner:

- Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. The pressure in the vapor line connected to the delivery tank shall be continuously monitored during each loading, and

recorded at least once a day on the days when operator is present on the site. [District Rule 4624, 5.4]

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;

2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;

3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;

   a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
   b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act;

5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and

6. Do not seek to consolidate overlapping applicable requirements.

Based on the discussion in the proposal section, the District found that Chevron's set-up meets the intent of the requirements and it was unnecessary to include recording of pressure in vapor line every 15-minutes. Moreover, monitoring and recording of pressure in the vapor line does not affect the performance of VRU and its CMS system. Therefore, the proposed project is considered a minor modification. Note that the CMS under permit N-199-5 already satisfies the requirements under 40 CFR Part 64.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs (Appendix IV) ;

2. The source's suggested draft permit (Appendix I); and

3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix III).

Compliance is expected with this Rule.

APPENDICES

Appendix I:	Proposed Title V Operating Permit No. N-199-8-5
Appendix II:	Existing Permit to Operate N-199-8-4
Appendix III:	Permit Application
Appendix IV:	Emissions Change

Appendix I
Proposed Title V Operating Permit No. N-199-8-5

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-199-8-5

EXPIRATION DATE: 08/31/2016

DRAFT

EQUIPMENT DESCRIPTION:
LOADING RACK (UNLEADED GASOLINE AND TRANSMIX)

PERMIT UNIT REQUIREMENTS

1. All vapors displaced from the transfer of gasoline to delivery vehicles shall be vented to the vapor recovery system permitted under N-199-5. [District NSR Rule and 40 CFR 63.11088(a)] Federally Enforceable Through Title V Permit
2. A log of all breakdowns of equipment processing the vapors generated at the terminal shall be maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The log shall include the dates and hours during which the vapor control equipment is down and the total gallons of product received and /or loaded out for each tank during the breakdown period. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The log sheet shall be available to District employees during normal operating hours. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The facility owner/operator shall maintain daily records indicating the amount, in gallons, of the organic liquids received and loaded out. [District NSR Rule and Rule 4624, 6.1.3] Federally Enforceable Through Title V Permit
6. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081, 5.0] Federally Enforceable Through Title V Permit
7. Operator shall maintain all records of required monitoring data and support information for inspection for a period of five years. Such records shall be made readily available to the APCO, ARB, or EPA during normal business hours and submitted upon request to the APCO, ARB, or EPA. [District Rule 2520, 9.4.2; and 4624, 6.1.4] Federally Enforceable Through Title V Permit
8. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.08 pounds per 1000 gallons of organic liquid with greatest vapor pressure loaded. [40 CFR 60.502(b), District Rules 2520, 9.3.2, 4624, 5.1; and 40 CFR 63.11088(a)] Federally Enforceable Through Title V Permit
9. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. The pressure in the vapor line connected to the delivery tank shall be continuously monitored during each loading, and recorded at least once a day on the days when operator is present on the site. [District Rule 4624, 5.4] Federally Enforceable Through Title V Permit
10. All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.08 lb/1000 gallons loaded; or Class 2 loading facilities equipped with a system to control at least 95% of VOC displaced; and which operate so the delivery tank does not exceed 18 inches water column pressure nor 6 inches water column vacuum. [District Rules 4621, 5.7.3 & 5.7.6 and 4624, 5.5] Federally Enforceable Through Title V Permit

DRAFT

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. No gasoline delivery vessel shall be used or operated unless it is vapor tight. No gasoline delivery vessel shall be operated or loaded unless valid State of California decals are displayed on the cargo tank, attesting to the vapor integrity of the tank as verified by annual performance of CARB required Certification and Test Procedures for Vapor Recovery Systems for Cargo Tanks. [District Rule 4621, 5.7.2 & 5.7.3, Health & Safety Code, section 41962, and CCR, Title 17 section 94004] Federally Enforceable Through Title V Permit

12. The test method to determine vapor tightness of delivery vessels owned or operated by this facility shall be the ARB Test Procedure for Determination of Leaks, TP-204.3. [District Rule 4621, 6.4.4] Federally Enforceable Through Title V Permit

13. Construction, reconstruction (as defined in District Rule 4001, amended April 14, 1999), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit

14. Loading and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rules 4621, 5.1 and 4624, 5.6] Federally Enforceable Through Title V Permit

15. During the loading of organic liquids, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rules 2520, 9.3.2; 4624, 5.9.1; 40CFR 60.502 (j) and 40 CFR 63.11092] Federally Enforceable Through Title V Permit

16. {2572} Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

17. {2573} Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

18. Each detected leak shall be repaired or replaced within 72 hours of detection. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624, 5.9.3 and 40 CFR 60.502 (j)] Federally Enforceable Through Title V Permit

19. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 72 hours), and E) inspector name and signature. [District Rule 2520, 9.3.2; 4624, 6.1.3 and 40CFR 60.505 (c)] Federally Enforceable Through Title V Permit

20. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.3.1] Federally Enforceable Through Title V Permit

21. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Test Procedure TP-203.1. [District Rule 4624, 6.3.2 and 40 CFR 63.11092] Federally Enforceable Through Title V Permit

DRAFT

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of ñ2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.3.2 and 40CFR60.503(d) and 40 CFR 63.11092] Federally Enforceable Through Title V Permit

23. {868} The vapor collection and control system shall consist of a device which returns collected vapors to a product storage tank only. The system shall not include a device which incinerates, adsorbs or otherwise treats collected vapors. [District Rule 2520, 9.1] Federally Enforceable Through Title V Permit

24. {869} Loading of a delivery vessel shall discontinue if its pressure relief valve opens. Corrective action shall be taken should this condition occur. [District Rule 2520, 9.1] Federally Enforceable Through Title V Permit

25. The permittee shall submit all applicable notifications as specified in 40 CFR 63.9. [40 CFR 63.11088(e) and 40 CFR 63.11093] Federally Enforceable Through Title V Permit

26. The permittee shall keep records and submit reports as specified in 40 CFR 63.11094 and 40 CFR 63.11095. [40 CFR 63.11088(f)] Federally Enforceable Through Title V Permit

DRAFT

Appendix II
Existing Permit to Operate N-199-8-4

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-199-8-4 **EXPIRATION DATE:** 08/31/2016

EQUIPMENT DESCRIPTION:
LOADING RACK (UNLEADED GASOLINE AND TRANSMIX)

PERMIT UNIT REQUIREMENTS

1. All vapors displaced from the transfer of gasoline to delivery vehicles shall be vented to the vapor recovery system permitted under N-199-5. [District NSR Rule and 40 CFR 63.11088(a)] Federally Enforceable Through Title V Permit
2. A log of all breakdowns of equipment processing the vapors generated at the terminal shall be maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The log shall include the dates and hours during which the vapor control equipment is down and the total gallons of product received and /or loaded out for each tank during the breakdown period. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The log sheet shall be available to District employees during normal operating hours. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The facility owner/operator shall maintain daily records indicating the amount, in gallons, of the organic liquids received and loaded out. [District NSR Rule and Rule 4624, 6.1.3] Federally Enforceable Through Title V Permit
6. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081(as amended December 16, 1993). [District Rule 1081, 5.0] Federally Enforceable Through Title V Permit
7. Operator shall maintain all records of required monitoring data and support information for inspection for a period of five years. Such records shall be made readily available to the APCO, ARB, or EPA during normal business hours and submitted upon request to the APCO, ARB, or EPA. [District Rule 2520, 9.4.2; and 4624, 6.1.4] Federally Enforceable Through Title V Permit
8. The loading rack shall be equipped with bottom loading and a vapor collection and control system such that TOC emissions do not exceed 0.08 pounds per 1000 gallons of organic liquid with greatest vapor pressure loaded. [40 CFR 60.502(b), District Rules 2520, 9.3.2, 4624, 5.1; and 40 CFR 63.11088(a)] Federally Enforceable Through Title V Permit
9. Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. The pressure in the delivery tank being loaded shall be monitored and recorded at least once every 15 minutes. [District Rule 4624, 5.4 and 40 CFR 64] Federally Enforceable Through Title V Permit
10. All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.08 lb/1000 gallons loaded; or Class 2 loading facilities equipped with a system to control at least 95% of VOC displaced; and which operate so the delivery tank does not exceed 18 inches water column pressure nor 6 inches water column vacuum. [District Rules 4621, 5.7.3 & 5.7.6 and 4624, 5.5] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

11. No gasoline delivery vessel shall be used or operated unless it is vapor tight. No gasoline delivery vessel shall be operated or loaded unless valid State of California decals are displayed on the cargo tank, attesting to the vapor integrity of the tank as verified by annual performance of CARB required Certification and Test Procedures for Vapor Recovery Systems for Cargo Tanks. [District Rule 4621, 5.7.2 & 5.7.3, Health & Safety Code, section 41962, and CCR, Title 17 section 94004] Federally Enforceable Through Title V Permit
12. The test method to determine vapor tightness of delivery vessels owned or operated by this facility shall be the ARB Test Procedure for Determination of Leaks, TP-204.3. [District Rule 4621, 6.4.4] Federally Enforceable Through Title V Permit
13. Construction, reconstruction (as defined in District Rule 4001, amended April 14, 1999), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit
14. Loading and vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at a distance of one centimeter from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mls per average of 3 consecutive disconnects. [District Rules 4621, 5.1 and 4624, 5.6] Federally Enforceable Through Title V Permit
15. During the loading of organic liquids, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each loading arm. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be conducted using EPA Method 21 and shall be measured at a distance of one centimeter from the potential source. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21 using the following calibration gases: A) Zero air (less than 10 ppm of hydrocarbon in air); and B) Mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [District Rules 2520, 9.3.2; 4624, 5.9.1; 40CFR 60.502 (j) and 40 CFR 63.11092] Federally Enforceable Through Title V Permit
16. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of monthly drainage inspections at disconnect for each loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. Drainage inspections shall be completed before 10:00 AM the day of inspection. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. Each detected leak shall be repaired or replaced within 72 hours of detection. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624, 5.9.3 and 40 CFR 60.502 (j)] Federally Enforceable Through Title V Permit
19. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 72 hours), and E) inspector name and signature. [District Rule 2520, 9.3.2; 4624, 6.1.3 and 40CFR 60.505 (c)] Federally Enforceable Through Title V Permit
20. Analysis of halogenated exempt compounds shall be by ARB Method 432. [District Rule 4624, 6.3.1] Federally Enforceable Through Title V Permit
21. VOC emissions from the vapor collection and control system shall be determined annually using 40CFR 60.503. "Test Methods and Procedures" and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Test Procedure TP-203.1. [District Rule 4624, 6.3.2 and 40 CFR 63.11092] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

22. The loading rack's vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of ñ2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.3.2 and 40CFR60.503(d) and 40 CFR 63.11092] Federally Enforceable Through Title V Permit
23. The vapor collection and control system shall consist of a device which returns collected vapors to a product storage tank only. The system shall not include a device which incinerates, adsorbs or otherwise treats collected vapors. [District Rule 2520, 9.1] Federally Enforceable Through Title V Permit
24. Loading of a delivery vessel shall discontinue if its pressure relief valve opens. Corrective action shall be taken should this condition occur. [District Rule 2520, 9.1] Federally Enforceable Through Title V Permit
25. The permittee shall submit all applicable notifications as specified in 40 CFR 63.9. [40 CFR 63.11088(e) and 40 CFR 63.11093] Federally Enforceable Through Title V Permit
26. The permittee shall keep records and submit reports as specified in 40 CFR 63.11094 and 40 CFR 63.11095. [40 CFR 63.11088(f)] Federally Enforceable Through Title V Permit

Appendix III
Permit Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

HEALTHY AIR LIVING

Permit Application For:

[ ] ADMINISTRATIVE AMENDMENT [X] MINOR MODIFICATION [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Chevron USA Products Company – Chevron Banta Terminal

2. MAILING ADDRESS:

STREET/P.O. BOX: 22888 S Kasson Road

CITY: Tracy STATE: CA 9-DIGIT ZIP CODE: 95376

3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:

STREET: 22888 S. Kasson Road CITY: Tracy

____ ¼ SECTION ____ TOWNSHIP ____ RANGE ____

INSTALLATION DATE:

4. GENERAL NATURE OF BUSINESS:

Gasoline Distribution

5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE
(include Permit #'s if known, and use additional sheets if necessary)

PTO N-199-8-4 Condition Number 9 on the Title V permit which states…..

9. **Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. The pressure in the delivery tank being loaded shall be monitored and recorded at least once every 15 minutes. [District Rule 4624, 5.4 and 40 CFR 64] Federally Enforceable Through Title V Permit**

Should be modified to state the following. "Vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. The pressure in the delivery tank being loaded shall be monitored with a device capable of reading the values within +/- .2 inches of water. These readings will be collected on a daily basis." During the performance test, monitoring records will be collected every 15 minutes while trucks are being loaded.

6. TYPE OR PRINT NAME OF APPLICANT:
Greg Smith

TITLE OF APPLICANT:
Banta Terminal HES Specialist

7. SIGNATURE OF APPLICANT:

DATE:
May 26, 2015

PHONE: (916) 329-3144
FAX: (916) 447-1013
EMAIL: GSJC@chevron.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED : $ 0	CHECK#:
RECEIVED JUN 01 2015 SJVAPCD NORTHERN REGION	DATE PAID:	
	PROJECT NO: N1151933	FACILITY ID: N-199

San Joaquin Valley
Unified Air Pollution Control District

HEALTHY AIR LIVING

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

[ ] SIGNIFICANT PERMIT MODIFICATION
[X] MINOR PERMIT MODIFICATION
[ ] ADMINISTRATIVE AMENDMENT

COMPANY NAME: Chevron Banta Terminal	FACILITY ID: N- 199
1. Type of Organization:[x] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility	
2. Owner's Name:	
3. Agent to the Owner:	

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

(CJA) 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).

(CJA) 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.

(CJA) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(CJA) 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

5/26/15

Date

Curtis Aman

Name of Responsible Official (please print)

Terminal Manager

Title of Responsible Official (please print)

Appendix IV
Emissions Change

Emissions Change

The proposed project does not result in an increase in emissions of any pollutant. Therefore, emissions change is set to zero.