



**OCT 15 2014**

Mr. Jeff Randel  
Phillips 66 Pipeline LLC  
256 E. Polk St.  
Coalinga, CA 93210

**Re: Notice of Minor Title V Permit Modification  
District Facility # S-1518  
Project # 1131718**

Dear Mr. Randel:

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 incorporate recently issued S-1518-35-0 into the Title V operating permit. The ATC is to install a 90 barrel sump tank.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued S-1518-35-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

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

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**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

# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: S-1131718

Engineer: David Torii  
Reviewing Engineer: Rich Karrs

Facility Number: S-1518  
Facility Name: Phillips 66 Pipeline LLC – Junction Pump Station  
Mailing Address: 256 E. Polk St  
Coalinga, CA 93210

Contact Name: Jeff Randel  
Phone: 562-290-1516

*Reviewed by ASURR ARE*

OCT 09 2014

Responsible Official: Jeff Randel  
Title: WC Pipeline Division Manager

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## I. PROPOSAL

Phillips 66 Pipeline LLC (Phillips) is proposing a Title V minor permit modification to incorporate ATCs S-1518-35-0 into their Title V operating permit. The ATC is to install a 90 barrel sump tank.

The purpose of this evaluation 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 the proposed revisions.

## II. FACILITY LOCATION

The equipment is located at the Junction Pump Station, within the SE/4 Section 19, T26S, R19E.

## III. EQUIPMENT DESCRIPTION

S-1518-35-1: 90 BBL FIXED ROOF SUMP TANK WITH VAPOR CONTROL SYSTEM CONSISTING OF TWO CARBON CANISTERS IN SERIES

## IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

## V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

## VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The Changes in the original Permit to Operate and the implemented ATC are as follows

Condition #s on <u>Proposed</u> Permit S-1518-35-1	Condition is New, Modified, or Removed	Reason for Change from Current PTO
1-23	New	New Permit Unit

## VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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; and
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.

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;
2. The source's suggested draft permit; 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.

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(S-1518-35-1)

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1518-35-1

EXPIRATION DATE: 05/31/2014

SECTION: SE19 TOWNSHIP: 26S RANGE: 19E

## EQUIPMENT DESCRIPTION:

90 BBL FIXED ROOF SUMP TANK WITH VAPOR CONTROL SYSTEM CONSISTING OF TWO CARBON CANISTERS IN SERIES

## PERMIT UNIT REQUIREMENTS

1. Sump shall store only petroleum and mixtures of petroleum and water. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Two carbon canisters connected in series shall be utilized. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Each canister shall contain at least 200 pounds of carbon. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The carbon canisters removed from the system shall be sealed vapor tight. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Sampling ports adequate for use of an FID, PID or other District-approved VOC detection device shall be provided for both the influent and effluent gas streams of the primary and secondary carbon canisters. [District Rule 1081] Federally Enforceable Through Title V Permit
6. Permittee shall measure and record the VOC concentration at the inlet and outlet of the primary and at the outlet of the secondary carbon canister at least once each week for eight consecutive weeks. If the VOC concentration at the outlet of the primary carbon canister does not exceed 1% of the VOC concentration at the inlet of the primary carbon canister after eight consecutive weeks then monitoring shall be required once a month. If monthly monitoring demonstrates that the VOC concentration at the outlet of the primary carbon canister exceeds 1% of the VOC concentration at the inlet of the primary carbon canister then weekly monitoring shall resume. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The VOC concentration at the outlet of the secondary carbon canister shall not exceed 1% of the VOC concentration at the inlet of the primary carbon canister. [District Rule 2201] Federally Enforceable Through Title V Permit
8. If the VOC concentration at the outlet of the primary carbon canister exceeds 1% of the VOC concentration at the inlet of the primary carbon canister, the primary carbon canister shall be replaced with the secondary carbon canister and the secondary carbon canister shall be replaced with a fresh carbon canister. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Sump throughput shall not exceed 6 barrels per day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. This sump shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 9.5 psia under all storage conditions. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC emissions from the operation shall not exceed 0.1 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. The sump shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the sump, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in leak-free condition. The VOC control device shall be a carbon canister system that reduces the inlet VOC emissions by at least 99% by weight as determined by the test method specified in Section 6.4. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
13. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] Federally Enforceable Through Title V Permit
14. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated to methane in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as the dripping of organic liquid at a rate more than 3 drops per minute. A gas or liquid leak is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
15. Any sump gauging or sampling device on a sump vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623] Federally Enforceable Through Title V Permit
16. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this sump at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this sump. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 2201] Federally Enforceable Through Title V Permit
18. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 2201] Federally Enforceable Through Title V Permit
19. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the sump. The permittee shall also conduct an API gravity testing. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the sump identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 2201] Federally Enforceable Through Title V Permit
21. The permittee shall keep accurate records of each organic liquid stored in the sump, including its storage temperature, TVP, and API gravity. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Permittee shall maintain accurate records of sump throughput, true vapor pressure, and the measured VOC concentrations. [District Rule 1070 and 2201] Federally Enforceable Through Title V Permit
23. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

**ATTACHMENT B**  
Authority to Construct  
(S-1518-35-0)



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** S-1518-35-0

**ISSUANCE DATE:** 12/26/2012

**LEGAL OWNER OR OPERATOR:** PHILLIPS 66 PIPELINE LLC  
**MAILING ADDRESS:** JUNCTION PUMP STATION  
14990 HWY 46  
LOST HILLS, CA 93249

**LOCATION:** JUNCTION PUMP STATION  
14990 HWY 46  
LOST HILLS, CA 93249

**SECTION:** SE19 **TOWNSHIP:** 26S **RANGE:** 19E

**EQUIPMENT DESCRIPTION:**

90 BBL FIXED ROOF SUMP TANK WITH VAPOR CONTROL SYSTEM CONSISTING OF TWO CARBON CANISTERS IN SERIES

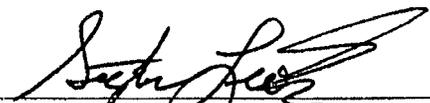
### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Sump shall store only petroleum and mixtures of petroleum and water. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Two carbon canisters connected in series shall be utilized. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Each canister shall contain at least 200 pounds of carbon. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The carbon canisters removed from the system shall be sealed vapor tight. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

  
Per **DAVID WARNER**, Director of Permit Services  
S: 1518-35-0 Dec 26 2012 7:44AM - TORID Joint Inspection NOT Required

7. Sampling ports adequate for use of an FID, PID or other District-approved VOC detection device shall be provided for both the influent and effluent gas streams of the primary and secondary carbon canisters. [District Rule 1081] Federally Enforceable Through Title V Permit
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CONDITIONS CONTINUE ON NEXT PAGE

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25. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

# ATTACHMENT C

## Emissions Increases

SSIPE (lb/yr)				
NOx	VOC	CO	SOx	PM10
0	22	0	0	0

# ATTACHMENT D

## Application



Phillips 66  
Pipeline LLC

James Adams  
Environmental Coordinator  
3900 Kilroy Airport Way #210  
Long Beach, CA 90806  
562-290-1516 Phone  
562-290-1580 Fax  
Jadams3@p66.com

RECEIVED

APR 19 2013

SJVAPCD  
Southern Region

April 19, 2013

Ms. Renee Chavez, Sr. Compliance Inspector  
San Joaquin Air Pollution Control District  
34946 Flyover Court  
Bakersfield, CA 91765

**Re: Title V Minor Modification  
Junction Pump Station  
Permit: S-1518-35-0  
14990 HWY 46  
Lost Hills, CA. 93249**

Dear Ms. Chavez:

Attached please find the Minor Modification Form TV-009 to add the above referenced permit to our Title V Permit.

Should you have any questions regarding the attached information, please feel free to contact me at the number or email listed above.

Sincerely,

**j.a.adams@p66.  
com**

James Adams  
Environmental Coordinator

Digitally signed by j.a.  
adams@p66.com  
DN: cn=j.a.adams@p66.com  
Date: 2013.04.19 09:38:43 -07'00'

Attachment

cc: Jerry Keeney

FILE: ENV.040.0700 HSE 480

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

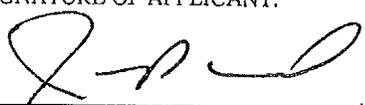
APR 26 2013

## Permit Application For:

ADMINISTRATIVE AMENDMENT    
  MINOR MODIFICATION    
  SIGNIFICANT MODIFICATION

SJVAPCD

FD-100 (12/01)

1. PERMIT TO BE ISSUED TO: <p style="text-align: center;">Phillips 66 Pipeline LLC - Junction Pump Station</p>	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>256 E. Polk St.</u>  CITY: <u>Coalinga</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93210</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>14900 HWY 46</u> CITY: <u>Lost Hills</u> <u>SE</u> ¼ SECTION <u>19</u> TOWNSHIP <u>26S</u> RANGE <u>19E</u>	INSTALLATION DATE:  <u>4-19-13</u>
4. GENERAL NATURE OF BUSINESS: <p style="text-align: center;">Crude Oil Pump Station</p>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>S-1518-5-35-0: 90 BBL SUMP WITH VAPOR CONTROL</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Jeff Randel</u>	TITLE OF APPLICANT: <u>WC Pipeline Division Manager</u>
7. SIGNATURE OF APPLICANT: 	DATE: <u>4-24-13</u>  PHONE: <u>(562) 290-1516</u> FAX: EMAIL: <u>j.a.adams@p66.com</u>

For APCD Use Only:

NO \$

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>S-1131718</u> FACILITY ID: <u>S-1518</u>

*Title V - Minor Mod*

APR 19 2013

SJVAPCD  
Southern Region

# San Joaquin Valley Unified Air Pollution Control District

## TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

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

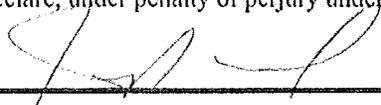
- SIGNIFICANT PERMIT MODIFICATION                       ADMINISTRATIVE AMENDMENT  
 MINOR PERMIT MODIFICATION

COMPANY NAME: <b>Phillips 66 Pipeline Company</b>	FACILITY ID: <b>S-1518</b>
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:	
3. Agent to the Owner:	

### 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

April 18, 2013  
 \_\_\_\_\_  
 Date

Jeff Randel  
 \_\_\_\_\_  
 Name of Responsible Official (please print)  
 WC Pipeline Division Manager  
 \_\_\_\_\_  
 Title of Responsible Official (please print)

Note: To incorporate S-1518-35-0 into Title V permit

Mailing Address: Central Regional Office \* 1990 E. Gettysburg Avenue \* Fresno, California 93726-0244 \* (559) 230-5900 \* FAX (559) 230-6061