



OCT 03 2011

Jane Yura
Pacific Gas & Electric Company
3401 Crow Canyon Road
San Ramon, CA 94583

**Re: Notice of Minor Title V Permit Modification
District Facility # N-608
Project # N-1110824**

Dear Ms. Yura:

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 Authorities to Construct N-608-30-0 and '31-0 into the Title V operating permit. These permits authorized the company to install two new 25,000 gallons (each) condensate storage tanks.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct N-608-30-0 and '31-0, emission increases, and the application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW:JK/st

Enclosures

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



OCT 03 2011

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # N-608
Project # N-1110824

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Pacific Gas & Electric Company is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct N-608-30-0 and '-31-0 into the Title V operating permit. These permits authorized the company to install two new 25,000 gallons (each) condensate storage tanks.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct N-608-30-0 and '-31-0, emission increases, and the application. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW:JK/st

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: N-1110824

Engineer: Jagmeet Kahlon
Date: October 3, 2011

Facility Number: N-608
Facility Name: Pacific Gas & Electric Co.
Mailing Address: 3401 Crow Canyon Road
San Ramon, CA 94583

Contact Name: Jane Yura
Phone: (415) 973-4603

Responsible Official: Jane Yura
Title: Vice President, Gas Engineering & Operations

I. PROPOSAL

Pacific Gas & Electric Company (PG&E) is proposing a Minor Modification to their Title V permit to incorporate the Authority to Construct permits (ATCs) N-608-30-0 and '-31-0 into the current Title V permit. These ATCs were issued without a Certificate of Conformity (COC) in 2006 under project N-1063164. These ATCs authorized the company to install two 25,000 gallon (each) condensate storage tanks, one at Turner Cut Station and another at Whisky Slough Station.

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

McDonald Island
Holt, CA

III. EQUIPMENT DESCRIPTION

Permit Number	Equipment Description
N-608-30-1	25,000 GALLON CONDENSATE STORAGE TANK (TURNER CUT STATION)
N-608-31-1	25,000 GALLON CONDENSATE STORAGE TANK (WHISKY SLOUGH STATION)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to the 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

Pacific Gas & Electric Company (PG&E) is proposing a Minor Modification to their Title V permit to incorporate the Authority to Construct permits (ATCs) N-608-30-0 and '-31-0 into the current Title V permit. These ATCs were issued without a Certificate of Conformity (COC) in 2006 under project N-1063164 when the New Source Review Rule (9/21/06) was in-effect and the significant net emission increase was 50,000 pounds per year for VOC. Since the net VOC emissions increase from the project was less than 50,000 pounds per year, the project did not trigger Federal Major Modification. Consequently, the project did not trigger Significant Modification to the Title V permit.

These ATCs authorized the company to install two 25,000 gallon (each) condensate storage tanks, one at Turner Cut Station and another at Whisky Slough Station.

Please note that the District updated the language in condition 7 and 8, from "gas-tight" to "leak-free", to match the language in District Rule 4623 – Storage of Organic Liquids (5/19/05).

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; 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.

VIII. ATTACHMENTS

- A. Proposed Draft Title V Permits
N-608-30-1, '-31-1
- B. Authority to Construct Permits
N-608-30-0, '-31-0
- C. Emissions Increases
- D. Application

ATTACHMENT A

Proposed Draft Title V Permits
N-608-30-1 and '-31-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-608-30-1

EXPIRATION DATE: 10/31/2015

EQUIPMENT DESCRIPTION:

25,000 GALLON CONDENSATE STORAGE TANK (TURNER CUT STATION)

DRAFT

PERMIT UNIT REQUIREMENTS

1. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 1.2 psia under all storage conditions. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Daily fluid throughput of the tank shall not exceed 840 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Permittee shall conduct TVP testing of the organic liquid stored in this tank 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 tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
4. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
5. Permittee shall submit the records of TVP testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
6. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, and TVP. [District Rule 4623] Federally Enforceable Through Title V Permit
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 leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
8. This tank shall be operated in a leak-free condition. A leak-free condition means a condition without a gas leak or a liquid leak. 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 and Rule 4623. Liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
9. 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 4623] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-608-31-1

EXPIRATION DATE: 10/31/2015

EQUIPMENT DESCRIPTION:

25,000 GALLON CONDENSATE STORAGE TANK (WHISKY SLOUGH STATION)

DRAFT

PERMIT UNIT REQUIREMENTS

1. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 1.2 psia under all storage conditions. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Daily fluid throughput of the tank shall not exceed 840 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Permittee shall conduct TVP testing of the organic liquid stored in this tank 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 tank in order to maintain exemption from the rule. [District Rule 4623] Federally Enforceable Through Title V Permit
4. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 4623] Federally Enforceable Through Title V Permit
5. Permittee shall submit the records of TVP testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623] Federally Enforceable Through Title V Permit
6. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, and TVP. [District Rule 4623] Federally Enforceable Through Title V Permit
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 leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
8. This tank shall be operated in a leak-free condition. A leak-free condition means a condition without a gas leak or a liquid leak. 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 and Rule 4623. Liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. [District Rule 4623] Federally Enforceable Through Title V Permit
9. 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 4623] 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 Permits
N-608-30-0, '-31-0**



San Joaquin Valley AIR POLLUTION CONTROL DISTRICT

AUTHORITY TO CONSTRUCT

PERMIT NO: N-608-30-0

ISSUANCE DATE: 09/04/2007

LEGAL OWNER OR OPERATOR: PACIFIC GAS & ELECTRIC CO.
MAILING ADDRESS: 77 BEALE ST - RM 2425D
SAN FRANCISCO, CA 94177

LOCATION: MCDONALD ISLAND
HOLT, CA 95234

EQUIPMENT DESCRIPTION:
25,000 GALLON CONDENSATE STORAGE TANK (TURNER CUT STATION)

CONDITIONS

1. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 1.2 psia under all storage conditions. [District Rule 2201]
2. Daily fluid throughput of the tank shall not exceed 840 gallon/day [District Rule 2201]
3. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank 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 tank in order to maintain exemption from the rule. [District Rule 4623]
4. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. [District Rule 4623]
5. Permittee shall submit the records of TVP testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623]
6. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, and TVP. [District Rule 4623]
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 4623]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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


DAVID WARNER, Director of Permit Services

N-608-30-0 Sep 4 2007 2:45PM - KLEVAHND Joint Inspection NOT Required

8. This tank shall be in a gas-tight condition. A gas-tight 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 and Rule 4623. [District Rule 4623]
9. 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 4623]



AUTHORITY TO CONSTRUCT

PERMIT NO: N-608-31-0

ISSUANCE DATE: 09/04/2007

LEGAL OWNER OR OPERATOR: PACIFIC GAS & ELECTRIC CO.

MAILING ADDRESS: 77 BEALE ST - RM 2425D
SAN FRANCISCO, CA 94177

LOCATION: MCDONALD ISLAND
HOLT, CA 95234

EQUIPMENT DESCRIPTION:
25,000 GALLON CONDENSATE STORAGE TANK (WHISKY SLOUGH STATION)

CONDITIONS

1. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 1.2 psia under all storage conditions. [District Rule 2201]
2. Daily fluid throughput of the tank shall not exceed 840 gallon/day [District Rule 2201]
3. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank 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 tank in order to maintain exemption from the rule. [District Rule 4623]
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6. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, and TVP. [District Rule 4623]
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 4623]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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

DAVID WARNER, Director of Permit Services

N-608-31-0 Sep 4 2007 2:45PM - KLEVANNI - Joint Inspection NOT Required

8. This tank shall be in a gas-tight condition. A gas-tight 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 and Rule 4623. [District Rule 4623]
9. 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 4623]

ATTACHMENT C

Emissions Increases

Per Project N-1063164, the emission increase from each permit unit (N-608-30-0 and '-31-0) is 160 lb-VOC/yr.

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

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

1. PERMIT TO BE ISSUED TO: Pacific Gas & Electric Company – McDonald Island Underground Storage Field (Facility ID No. N-608)	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>c/o Carol Burke, 3401 Crow Canyon Road</u> CITY: <u>San Ramon</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>94583</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>McDonald Island</u> CITY: <u>Holt</u> _____/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: 9/04/2007 – The date the ATCs for units 30 and 31 were issued.
4. GENERAL NATURE OF BUSINESS: Natural Gas Storage	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) ATC N-608-30-0: 25,000 Gallon Condensate Storage Tank (Turner Cut Station) ATC N-608-31-0: 25,000 Gallon Condensate Storage Tank (Whisky Slough Station)	
6. TYPE OR PRINT NAME OF APPLICANT: Jane Yura	TITLE OF APPLICANT: Vice President, Gas Engineering & Operations
7. SIGNATURE OF APPLICANT: 	DATE: <u>4/18/2011</u> PHONE: (415) 973-4603 FAX: (415) 973-1300 EMAIL: <u>jkyl @pge.com</u>

For APCD Use Only:

<p>DATE STAMP: RECEIVED APR 15 2011 SJVAPCD NORTHERN REGION</p>	<p>FILING FEE RECEIVED: \$ <u>0</u> CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>N1110824</u> FACILITY ID: <u>N-608</u></p>
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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: Pacific Gas & Electric Company – McDonald Island Underground Storage Field	FACILITY ID: N - 608
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: Pacific Gas & Electric Company	
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

4/18/2011

 Date

Jane Yura

 Name of Responsible Official (please print)
 Vice President, Vice President, Gas Engineering
 & Operations

 Title of Responsible Official (please print)