



JAN 18 2012

Helen Ordway  
Alon Bakersfield Refining  
P O Box 1551  
Bakersfield, CA 93302-1551

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # S-3303  
Project # S-1070743**

Dear Ms. Ordway:

The District has issued the Final Renewed Title V Permit for Alon Bakersfield Refining. The preliminary decision for this project was made on November 7, 2011. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Renewed Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Attachments

cc: Frank DeMaris, Permit Services Engineer

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



**JAN 18 2012**

Gerardo C. Rios, Chief  
Permits Office (AIR-3)  
U.S. EPA - Region IX  
75 Hawthorne St.  
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # S-3303  
Project # S-1070743**

Dear Mr. Rios:

The District has issued the Final Renewed Title V Permit for Alon Bakersfield Refining. The preliminary decision for this project was made on November 7, 2011. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Renewed Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner  
Director of Permit Services

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cc: Frank DeMaris, Permit Services Engineer

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JAN 18 2012

Mike Tollstrup, Chief  
Project Assessment Branch  
Air Resources Board  
P O Box 2815  
Sacramento, CA 95812-2815

**Re: Notice of Final Action - Title V Permit Renewal  
District Facility # S-3303  
Project # S-1070743**

Dear Mr. Tollstrup:

The District has issued the Final Renewed Title V Permit for Alon Bakersfield Refining. The preliminary decision for this project was made on November 7, 2011. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Renewed Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

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David Warner  
Director of Permit Services

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cc: Frank DeMaris, Permit Services Engineer

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

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Bakersfield Californian

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT  
NOTICE OF FINAL DECISION TO ISSUE  
RENEWED FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the renewed Federally Mandated Operating Permit to Alon Bakersfield Refining for its refinery gasoline terminal at 2436 Fruitvale Ave. in Bakersfield, California.

The District's analysis of the legal and factual basis for this proposed action, project #S-1070743, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the District office at the address below. For additional information regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation  
Alon Bakersfield Refining  
S-3303**

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**TITLE V PERMIT RENEWAL EVALUATION**  
**Refinery Gasoline Terminal**

**Engineer:** Frank DeMaris  
**Date:** January 6, 2012

**Facility Number:** S-3303  
**Facility Name:** Alon Bakersfield Refining  
**Mailing Address:** 2436 Fruitvale Ave.  
Bakersfield, CA 93308

**Contact Name:** Chris Cassady  
**Phone:** (661) 326-4557

**Responsible Official:** Ed Juno  
**Title:** Vice President

**Project # :** S-1070743  
**Deemed Complete:** March 9, 2007

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**I. PROPOSAL**

Alon Bakersfield Refining ("Alon") was issued a Title V permit on October 31, 2002. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

**II. FACILITY LOCATION**

Alon is located at 2436 Fruitvale Ave. in Bakersfield, California.

### III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

### IV. GENERAL PERMIT TEMPLATE USAGE

The applicant does not propose to use any model general permit templates.

### V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

### VI. FEDERALLY ENFORCEABLE REQUIREMENTS

#### A. Rules Updated

- District Rule 2020, Exemptions  
(amended September 21, 2006 ⇒ amended December 20, 2007 ⇒ amended August 18, 2011)
- District Rule 2201, New and Modified Stationary Source Review Rule  
(amended April 20, 2005 ⇒ amended December 15, 2005 ⇒ amended September 21, 2006 ⇒ amended December 18, 2008 ⇒ amended April 21, 2011)
- District Rule 4101, Visible Emissions  
(amended February 17, 2005)
- District Rule 4601, Architectural Coatings  
(amended December 17, 2009)
- District Rule 4621, Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants  
(amended December 20, 2007)

- District Rule 4623, Storage of Organic Liquids  
(amended May 19, 2005)
- District Rule 4624, Transfer of Organic Liquid  
(amended December 20, 2007)
- District Rule 8011, General Requirements  
(amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities  
(amended August 19, 2004)
- District Rule 8031, Bulk Materials  
(amended August 19, 2004)
- District Rule 8041, Carryout and Trackout  
(amended August 19, 2004)
- District Rule 8051, Open Areas  
(amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads  
(amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas  
(amended September 16, 2004)
- 40 CFR Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals

**B. Rules Removed**

No applicable rules have been removed since the last Title V permitting action.

**C. Rules Added**

No applicable rules have been added since the last Title V permitting action.



**D. Rules Not Updated**

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4202, Particulate Matter - Emission Rate (amended December 17, 1992)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR Part 82, Subpart F, Stratospheric Ozone

## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

### A. Rules Added

No applicable non-federally enforceable rules have been added since the last Title V permitting action.

### B. Rules Not Updated

District Rule 4102, Nuisance (as amended December 17, 1992)

Condition 41 of permit unit -0-2 is based on District Rule 4102 and will therefore not be discussed any further.

## VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit.

### A. District Rule 2020 - Exemptions

District Rule 2020 lists equipment which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any effect on current permit requirements and will therefore not be addressed in this evaluation.

**B. District Rule 2201 - New and Modified Stationary Source Review Rule**

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable at this time.

However, S-3303-4-2, condition 9, and condition 6 of permits '-5-0 through '-11-0 prohibit VOC emissions from the Area 1 refinery from exceeding 2,476.9 lb/day. These conditions duplicate condition 44 on proposed Permit to Operate S-3303-0-2. Similarly, condition 1 of permits '-5-0 through '-11-0 duplicate condition 41 on proposed Permit to Operate S-3303-0-2. The duplicate conditions have been deleted from proposed Permit to Operate S-3303-4-3 through '-11-1.

**C. District Rule 2520 - Federally Mandated Operating Permits**

There are no federally applicable greenhouse gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40 CFR 98) is not included in the definition of an applicable requirement within Title V, as specified in 40 CFR 71.2. Therefore, no GHG requirements will be included in the proposed Permit to Operate. No further discussion is required.

However, it is noted that condition 4 on current Permit to Operate S-3303-5-0 through '-11-0 requires that records be maintained for only two years. The

short record keeping requirement conflicts with both 40 CFR 70.6(a)(3)(ii)(B) and District Rule 2520, Section 9.4.2. The record keeping requirement has been extended to five years in accordance with the Federal and District record keeping requirements for the Title V permit program.

#### **D. District Rule 4101 - Visible Emissions**

District Rule 4101 has been submitted to the EPA to replace SIP approved Rule 401 (all counties of the SJVUAPCD). EPA made a preliminary determination that District Rule 4101 is "more stringent" than the county versions previously referenced, per correspondence dated August 20, 1996.

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101. Condition 22 of permit unit -0-2 ensures compliance.

#### **E. District Rule 4601 - Architectural Coatings**

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of any architectural coating to no more than what is listed in the Table of Standards (Section 5.0). This rule further specifies labeling requirements, coatings thinning recommendations, and storage requirements.

The following changes were included in the latest rule amendment that resulted in adding new permit requirements and/or revising current permit requirements:

- The tables outlining the VOC content of different specialty coatings has been largely replaced with the Table of Standards in Section 5.0.
- New labeling, reporting, test methodology and other requirements have been incorporated into the rule in order to allow ARB to administer the Averaging Program as detailed in Section 8.0.

The following permit requirements were added and/or revised to ensure compliance with this rule:

a. S-3303-0-2 (Facility-Wide Requirements):

- Conditions 23, 24, and 25 ensure compliance with the revised requirements of this rule.

**F. District Rule 4621 - Transfer of Gasoline into Stationary Storage Containers, Delivery Vessels, and Bulk Terminals**

This rule was amended in 2007 to update and clarify various requirements. The updates are primarily in response to ARB regulations governing the use of enhanced vapor recovery systems. The following permit requirements were added or revised to ensure compliance with this rule:

a. S-3303-1-5 (Truck Loading Operation):

This rule is principally applicable to the loading of gasoline delivery vessels at this facility. The District has verified that conditions 16, 18 and 19 on the proposed Permit to Operate will ensure compliance with the requirements of this rule.

**G. District Rule 4623 - Storage of Organic Liquids**

This rule is intended to limit VOC emissions from stationary storage containers used for organic liquids. This rule was last amended on May 19, 2005 to correct certain deficiencies identified by EPA and to clarify certain exemptions and other requirements.

a. S-3303-2-2 (12,000 Gallon Gasoline Additive Tank):

Condition 2 on the current Permit to Operate ensure that this tank is not subject to the requirements of this Rule, except that the operator is required to maintain records to document compliance with the terms of the exemption. This rule requires the operator to periodically test the organic liquid stored to ensure ongoing compliance. However, this tank is used to store manufactured gasoline additives, so the District has previously determined that the testing can be conducted by the additive manufacturer and the tank operator merely needs to maintain records from the manufacturer. The District has previously included conditions 2, 7, and 8 on the proposed Permit to Operate to ensure ongoing compliance with the exemption from Rule 4623.

b. S-3303-4-3 (5,000 Gallon Tank 5000-1):

In 2001, pursuant to ATC S-3303-4-1, the permittee converted this tank to store contaminated groundwater from a groundwater remediation operation. This ATC required the use of carbon canisters as a vapor control mechanism. That operation was completed expeditiously, and this tank has been unused and out of service, with the carbon canisters removed, since 2003, although the tank is equipped with a P/V vent valve for compliance with the requirements of Rule 4623.

Under the current Permit to Operate, this tank remains permitted for storage of gasoline additives and other organic liquids up to a Reid Vapor Pressure of 9.0 psia. The tank has not been reconnected to the gasoline loading operation, and such reconnection would be a change in the method of operation requiring an ATC. Therefore, the equipment description has been updated to reflect the actual configuration of the tank, and conditions no longer applicable to the actual configuration have been removed. Conditions 1, 4, and 5 from the current Permit to Operate have been deleted, while conditions 1, 2, and 4 on the proposed Permit to Operate will ensure compliance with the applicable requirements of Rule 4623.

c. S-3303-5-1 (5,000 Gallon Tank 5000-2):

Condition 2 on the current Permit to Operate ensure that this tank is not subject to the requirements of this Rule, except that the operator is required to maintain records to document compliance with the terms of the exemption. This rule requires the operator to periodically test the organic liquid stored to ensure ongoing compliance. The District has previously included conditions 2, 4, and 5 on the current Permit to Operate to ensure ongoing compliance with the exemption. These conditions have been renumbered as conditions 1, 3, and 4 on the proposed Permit to Operate.

d. S-3303-6-1 (5,000 Gallon Tank 5000-3):

Condition 2 on the current Permit to Operate ensure that this tank is not subject to the requirements of this Rule, except that the operator is required to maintain records to document compliance with the terms of the exemption. This rule requires the operator to periodically test the organic liquid stored to ensure ongoing compliance. The District has previously included conditions 2, 4, and 5 on the current Permit to Operate to ensure ongoing compliance with the exemption. These conditions have been renumbered as conditions 1, 3, and 4 on the proposed Permit to Operate.

e. S-3303-7-1 (5,000 Gallon Tank 5000-4):

Condition 2 on the current Permit to Operate ensure that this tank is not subject to the requirements of this Rule, except that the operator is required to maintain records to document compliance with the terms of the exemption. This rule requires the operator to periodically test the organic liquid stored to ensure ongoing compliance. The District has previously included conditions 2, 4, and 5 on the current Permit to Operate to ensure ongoing compliance with the exemption. These conditions have been renumbered as conditions 1, 3, and 4 on the proposed Permit to Operate.

f. S-3303-8-1 (5,000 Gallon Tank 5000-5):

Condition 2 on the current Permit to Operate ensure that this tank is not subject to the requirements of this Rule, except that the operator is required to maintain records to document compliance with the terms of the exemption. This rule requires the operator to periodically test the organic liquid stored to ensure ongoing compliance. The District has previously included conditions 2, 4, and 5 on the current Permit to Operate to ensure ongoing compliance with the exemption. These conditions have been renumbered as conditions 1, 3, and 4 on the proposed Permit to Operate.

g. S-3303-9-1 (5,000 Gallon Tank 5000-6):

Condition 2 on the current Permit to Operate ensure that this tank is not subject to the requirements of this Rule, except that the operator is required to maintain records to document compliance with the terms of the exemption. This rule requires the operator to periodically test the organic liquid stored to ensure ongoing compliance. The District has previously included conditions 2, 4, and

5 on the current Permit to Operate to ensure ongoing compliance with the exemption. These conditions have been renumbered as conditions 1, 3, and 4 on the proposed Permit to Operate.

h. S-3303-10-1 (5,000 Gallon Tank 5000-7):

Condition 2 on the current Permit to Operate ensure that this tank is not subject to the requirements of this Rule, except that the operator is required to maintain records to document compliance with the terms of the exemption. This rule requires the operator to periodically test the organic liquid stored to ensure ongoing compliance. The District has previously included conditions 2, 4, and 5 on the current Permit to Operate to ensure ongoing compliance with the exemption. These conditions have been renumbered as conditions 1, 3, and 4 on the proposed Permit to Operate.

i. S-3303-11-1 (5,000 Gallon Tank 5000-8):

Condition 2 on the current Permit to Operate ensure that this tank is not subject to the requirements of this Rule, except that the operator is required to maintain records to document compliance with the terms of the exemption. This rule requires the operator to periodically test the organic liquid stored to ensure ongoing compliance. The District has previously included conditions 2, 4, and 5 on the current Permit to Operate to ensure ongoing compliance with the exemption. These conditions have been renumbered as conditions 1, 3, and 4 on the proposed Permit to Operate.

**H. District Rule 4624 - Transfer of Organic Liquids**

This rule is intended to limit VOC emissions from organic liquid transfer operations. It was amended on December 20, 2007, partly to update and clarify the applicability and general requirements and partly to add a requirement to inspect for leaks.

a. S-3303-1-5 (Truck Loading Operation):

Several conditions have been updated to use current language and citations from the amended rule. In addition, the leak detection conditions on the current Permit to Operate have been revised to incorporate the leak detection requirements of the rule. The District has verified that conditions 1, 9, 14, 15, 17, 20 through 22, 25, and 26 on the proposed Permit to Operate will ensure compliance with the requirements of this rule.



b. S-3303-3-4 (Truck Off-Loading Pad):

The truck unloading pad was originally permitted before this Rule was applied to all organic liquid transfer operations. Conditions 6 and 7, 8 and 9, and 10 through 12 from the current Permit to Operate were renumbered as conditions 12 and 13, 6 and 7, and 9 through 11 on the proposed Permit to Operate. Conditions 6 and 7 on the proposed Permit to Operate were updated to reflect the requirements of Rule 4624, and condition 8 on the proposed Permit to Operate was added to incorporate the leak repairs requirements of the Rule.

**I. District Rule 8011 - General Requirements**

The purpose of Regulation VIII (Fugitive PM10 Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The Rules contained in this Regulation have been developed pursuant to United States Environmental Protection Agency guidance for Serious PM10 Nonattainment Areas. The rules are applicable to specified anthropogenic fugitive dust sources. Fugitive dust contains PM10 and particles larger than PM10. Controlling fugitive dust emissions when visible emissions are detected will not prevent all PM10 emissions, but will substantially reduce PM10 emissions.

The provisions of this rule are applicable to specified outdoor fugitive dust sources. The definitions, exemptions, requirements, administrative requirements, recordkeeping requirements, and test methods set forth in this rule are applicable to all Rules under Regulation VIII (Fugitive PM10 Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District.

Conditions 29 through 34 of permit unit -0-2 ensure compliance.

**J. District Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities**

The purpose of this rule is to limit fugitive dust emissions from construction, demolition, excavation, extraction, and other earthmoving activities.

This rule applies to any construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site. This rule also applies to the construction of new landfill disposal sites or

modification to existing landfill disposal sites prior to commencement of landfilling activities.

Section 5.0 requires that no person shall perform any construction, demolition, excavation, extraction, or other earthmoving activities unless the appropriate requirements in sections 5.1 and 5.2 are sufficiently implemented to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 29 of permit unit -0-2 ensures compliance.

**K. District Rule 8031 - Bulk Materials**

The purpose of this rule is to limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials.

This rule applies to the outdoor handling, storage, and transport of any bulk material.

Section 5.0 requires that no person shall perform any outdoor handling, storage, and transport of bulk materials unless the appropriate requirements in Table 8031-1 of this rule are sufficiently implemented to limit VDE to 20% opacity or to comply with the conditions for a stabilized surface as defined in Rule 8011. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 30 of permit unit -0-2 ensures compliance.

**L. District Rule 8041 - Carryout and Trackout**

The purpose of this rule is to limit fugitive dust emissions from carryout and trackout.

This rule applies to all sites that are subject to Rules 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), 8031 (Bulk Materials), and 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or trackout has occurred or may occur.

Section 5.0 requires that an owner/operator shall sufficiently prevent or cleanup carryout and trackout as specified in sections 5.1 through 5.8. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII. The use of blower devices, or dry rotary brushes or brooms, for removal of carryout and trackout on public roads is expressly prohibited. The removal of carryout and trackout from

paved public roads does not exempt an owner/operator from obtaining state or local agency permits which may be required for the cleanup of mud and dirt on paved public roads.

Condition 31 of permit unit –0-2 ensures compliance.

**M. District Rule 8051 - Open Areas**

The purpose of this rule is to limit fugitive dust emissions from open areas.

This rule applies to any open area having 3.0 acres or more of disturbed surface area, that has remained undeveloped, unoccupied, unused, or vacant for more than seven days.

Section 5.0 requires that whenever open areas are disturbed or vehicles are used in open areas, the owner/operator shall implement one or a combination of control measures indicated in Table 8051-1 to comply with the conditions of a stabilized surface at all times and to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 32 of permit unit –0-2 ensures compliance.

**N. District Rule 8061 - Paved and Unpaved Roads**

The purpose of this rule is to limit fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria.

This rule applies to any new or existing public or private paved or unpaved road, road construction project, or road modification project.

Condition 33 of permit unit -0-2 ensures compliance.

**O. District Rule 8071 - Unpaved Vehicle/Equipment Traffic Area**

The purpose of this rule is to limit fugitive dust emissions from unpaved vehicle and equipment traffic areas by implementing control measures and design criteria.

This rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger.

Condition 34 of permit unit -0-2 ensures compliance.

**P. 40 CFR Part 60, Subpart XX**

This Subpart was amended on December 19, 2003 to clarify certain monitoring and record keeping requirements. These amendments have no effect on the equipment at this facility subject to this Subpart, permit unit S-3303-1-5.

**Q. 40 CFR Part 64-CAM**

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

None of the emissions units at this facility is equipped with an add-on control device for any pollutant. While unit S-3303-1-5 is vented to a vapor collection system, this system is inherent process equipment that is required for safe operation of the loading rack. Inherent process equipment is not an add-on control device that would make this unit subject to the CAM requirements. Therefore, no emissions unit at this facility is subject to the requirements of 40 CFR 64. No further discussion is required.

**IX. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

**A. Requirements Addressed by Model General Permit Templates**

The applicant does not propose to use any model general permit templates.

**B. Requirements not Addressed by Model General Permit Templates**

The applicant does not propose to use any permit shields not included in a model general permit template. However, the current facility-wide requirements include an observation, contained in condition 45, that this

facility, although located at a petroleum refinery, is not part of a refinery as defined in District Rules 4451 and 4452. Condition 45 on the current Permit to Operate then grants a permit shield from Rule 4451 and 4452. As noted below, Rule 4451 and 4452 have been rescinded and replaced by District Rule 4455, which includes the same definition of "refinery" as Rule 4451 and 4452 and is also applicable to components at petroleum refineries. Therefore, the observation and permit shield included in condition 45 of the current Permit to Operate will be updated to reflect Rule 4455 instead.

**C. Obsolete Permit Shields From Existing Permit Requirements**

Condition 45 of the current Facility-Wide Permit to Operate provides a permit shield from District Rule 4451 and 4452. These rules were amended on April 20, 2005 to expire 12 months later when Rule 4455 became effective. Therefore, the permit shield granted in condition 45 is being removed. As noted above, the permit shield is being replaced by a permit shield for Rule 4455.

**X. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit.

**XI. ATTACHMENTS**

- A. Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List

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# ATTACHMENT A

Renewed Title V Operating Permit

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# Permit to Operate

**FACILITY:** S-3303

**EXPIRATION DATE:** 08/31/2016

**LEGAL OWNER OR OPERATOR:**  
**MAILING ADDRESS:**

ALON BAKERSFIELD REFINING  
P O BOX 1551  
BAKERSFIELD, CA 93302-1551

**FACILITY LOCATION:**

2436 FRUITVALE AVENUE  
BAKERSFIELD, CA 93308

**FACILITY DESCRIPTION:**

GASOLINE TERMINAL WITHOUT BULK STORAGE  
FACILITIES

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

**Seyed Sadredin**  
Executive Director / APCO

**David Warner**  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

FACILITY: S-3303-0-2

EXPIRATION DATE: 08/31/2016

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: ALON BAKERSFIELD REFINING  
Location: 2436 FRUITVALE AVENUE, BAKERSFIELD, CA 93308  
S-3303-0-2 : Dec 23 2011 4:07PM - DEMARISF



10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
43. This facility is part of stationary source S-33, and is part of the Area 1 refinery portion of S-33. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Volatile organic compound (VOC) emissions from entire Area 1 refinery portion of stationary source S-33 shall not exceed 2,476.9 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
45. This source is not a petroleum refinery or a chemical plant, as defined in District Rule 4455, Section 3.0 (Amended April 20, 2005). Therefore, the requirements of District Rule 4455, Section 5.0 do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
46. On December 31, 2002, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-1-5

**EXPIRATION DATE:** 08/31/2016

**SECTION:** 27 **TOWNSHIP:** 29S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

TRUCK LOADING OPERATION INCLUDING 36 BOTTOM LOADING ARMS, 6 TOP LOADING ARMS AND VAPOR RECOVERY ARMS SERVED BY VAPOR RECOVERY SYSTEM LISTED ON PERMIT S-33-41

## PERMIT UNIT REQUIREMENTS

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1. Loading arms shall establish a seal with delivery vessels that is leak-free, as defined in Rule 4624 (amended December 20, 2007). [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
2. Top loading arms shall be used to load fuel oil and residual oil only. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Throughput of fuel oil and vacuum residue from this permit unit this shall not exceed 1,056,000 gallons per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Vapor return arms shall be connected during diesel loading if TVP exceeds 0.008 psia at loading conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Vapor return arms shall be connected during diesel loading if vessel being loaded previously carried petroleum liquid with TVP greater than 0.008 psia at loading conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Vapor return arms shall be connected during gas oil, fuel oil, heavy fuel oil or vacuum residue loading with TVP greater than 0.0012 psia at loading conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Vapor return arms shall be connected during gas oil, fuel oil, heavy fuel oil or vacuum residue loading if vessel being previously loaded carried petroleum liquid with TVP greater than 0.0012 psia at loading conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Hose couplers shall be of dry-break type to prevent liquid spill upon disconnection. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Liquid and vapor hoses, couplers, fittings and piping shall be maintained in a condition that is leak-free, as defined in Rule 4624 (amended December 20, 2007). [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
10. VOC emission rate, excluding leakage, shall not exceed 2.0 lb/hr from this permit unit. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Gasoline loading leakage and spillage shall not exceed 4.6 lb/day from this permit unit. [District NSR Rule] Federally Enforceable Through Title V Permit
12. 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, and Kern County Rule 108.1] Federally Enforceable Through Title V Permit
13. Operator shall maintain all records of required monitoring data and support information for inspection for a period of five years. [District Rule 2520, 9.4.2] 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.

14. 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 and 4624, 5.1 and Kern County Rule 413] Federally Enforceable Through Title V Permit
15. 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. [40 CFR 60.502(h), District Rule 4624, 5.4 and Kern County Rule 413] Federally Enforceable Through Title V Permit
16. The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed unless the container is equipped with a permanent submerged fill pipe and an ARB certified Phase I vapor recovery system, which is maintained and operated according to the manufacturers specifications. [District Rule 4621, 5.1.1] Federally Enforceable Through Title V Permit
17. All delivery tanks which previously contained organic liquids, including gasoline, with a TVP of 1.5 psia or greater at the storage container's maximum organic liquid storage temperature 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. [District Rules 4624, 5.5] Federally Enforceable Through Title V Permit
18. 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, 5.2.1 & 5.2.2, Health & Safety Code, section 41962, and CCR, Title 17 section 94004] Federally Enforceable Through Title V Permit
19. The test method to determine vapor tightness of delivery vessels owned or operated by this facility shall be EPA Method 27. [District Rule 4621, 6.2.3 and 40 CFR 60.503(c)] Federally Enforceable Through Title V Permit
20. 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
21. Transfer 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 mL per average of 3 consecutive disconnects. [District Rule 4624, 3.13, 3.17, and 5.6; and Kern County Rule 413] Federally Enforceable Through Title V Permit
22. During the transfer of organic liquids, the operator shall perform and record the results of monthly leak inspections of the loading and vapor collection equipment at each transfer rack. Leak inspections shall be conducted using sight, sound, or smell. Once each calendar quarter, in lieu of the regular monthly monitoring, the operator shall monitor the vapor collection and control system and each transfer rack using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 4624, 5.9.1 and 6.3.8, and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
23. 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 drainage inspections at disconnect conducted on a quarter of the loading arms every calendar quarter. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall change to quarterly for all loading arms. If no excess drainage is found after four consecutive quarterly inspection of all loading arms, the inspection frequency shall return to inspections of a quarter of the loading arms every calendar quarter. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

25. Each leaking component shall be repaired or replaced within 72 hours after detection. If the leaking component cannot be repaired or replaced within 72 hours, it shall be taken out of service until such time as it is repaired or replaced. Components taken out of service shall be repaired or replaced within 15 calendar days of leak detection. [District Rule 4624, 5.9.3 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
26. 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 15 days), and E) inspector name and signature. [District Rule 4624, 6.1.3 and 40 CFR 60.505(c)] Federally Enforceable Through Title V Permit
27. 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  $\pm 2.5$  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 40 CFR 60.503(d)] Federally Enforceable Through Title V Permit
28. 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
29. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rule 413, District Rules 4621(as amended December 20, 2007), section 5.7, and 4624 (as amended December 20, 2007). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
30. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40CFR60, Subpart XX. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
31. Formerly S-33-45-0.

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-2-2

**EXPIRATION DATE:** 08/31/2016

**SECTION:** 27 **TOWNSHIP:** 29S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

12,000 GALLON GASOLINE ADDITIVE TANK INCLUDING DISTRIBUTION PUMPS AND PIPING TO GASOLINE LOADING OPERATION

## PERMIT UNIT REQUIREMENTS

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1. Only additives for motor vehicle fuel shall be stored in tank. [District NSR Rule] Federally Enforceable Through Title V Permit
2. True vapor pressure of additives stored shall not exceed 0.34 psia. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All vapors displaced from tank shall be returned to truck vapor space when additive is received. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All tank openings and fittings shall remain leak-free, as defined in Rule 4623 (amended May 19, 2005) during normal operation. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Additives shall be piped only to existing gasoline loading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Volatile organic compound (VOC) emissions shall not exceed 0.2 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The operator shall keep accurate records of the types of organic liquids stored and and the manufacturer's True Vapor Pressure specification for organic liquids stored to verify continued exemption from District Rule 4623 (amended May 19, 2005). [District Rules 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Operator shall maintain all records of required monitoring data and support information for inspection for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Formerly S-33-128-0.

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-3-4

**EXPIRATION DATE:** 08/31/2016

**SECTION:** 27 **TOWNSHIP:** 29S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

TANKER TRUCK PRODUCT OFF-LOADING PAD WITH ELECTRIC UNLOADING PUMP, ELECTRIC SUMP PUMP, DEAERATOR, ROTARY VANE METER, 2 LIQUID PRODUCT CONNECTIONS/LINES TO TANKS S-33-41 AND S-33-46, PIPING, AND VARIOUS FUGITIVE COMPONENTS

## PERMIT UNIT REQUIREMENTS

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1. This equipment shall not include provisions for loading of tanker trucks. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Vapor return line vents on tanker truck storage vessels shall be open only during gasoline off-loading, and shall be closed immediately upon completion of gasoline off-loading. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Tanker truck hatches shall be closed at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. There shall be no more than 25 tanker truck unloadings per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Total liquid drainage/leaks from all hose disconnects shall not exceed 20 ml per tanker truck. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Organic liquid transfer 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 mL per average of 3 consecutive disconnects. [District Rule 4624, 3.13, 3.17, and 5.6] Federally Enforceable Through Title V Permit
7. During the transfer of organic liquids, the operator shall perform and record the results of quarterly leak inspections of the vapor collection and control system and transfer equipment using a portable hydrocarbon detection instrument in accordance with EPA Method 21. If none of the components are found to be leaking during five consecutive quarterly inspections, the leak inspection frequency may be changed from quarterly to annually. Upon identification of any leak during an annual inspection the frequency shall revert to quarterly and the operator shall inform the District in writing within 14 days. [District Rule 4624, 5.9.1, 5.9.4, and 6.3.8] Federally Enforceable Through Title V Permit
8. Each leaking component shall be repaired or replaced within 72 hours after detection. If the leaking component cannot be repaired or replaced within 72 hours, it shall be taken out of service until such time as it is repaired or replaced. [District Rule 4624, 5.9.3]
9. 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 quarterly drainage inspections at disconnect. If no excess drainage is found during five consecutive quarterly inspections, the drainage inspection frequency may be changed from quarterly to annual. However, if one or more excess drainage condition is found during an annual inspection, the inspection frequency shall change back to quarterly. [District Rule 2520, 9.3.2] 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.



10. 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
11. 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 (including date each leak or excess drainage condition repaired), and E) inspector name and signature. [District Rule 4624, 5.9.3] Federally Enforceable Through Title V Permit
12. Permittee shall keep accurate daily records of tanker truck unloadings, liquid types, and liquid throughputs. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Records required by this permit shall be retained on site for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. Formerly S-33-355-1.

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-4-3

**EXPIRATION DATE:** 08/31/2016

**EQUIPMENT DESCRIPTION:**

5,000 GALLON GASOLINE ADDITIVE STORAGE TANK #5000-1 WITH A PRESSURE/VACUUM VENT VALVE

## PERMIT UNIT REQUIREMENTS

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1. All tank appurtenances, piping, flanges, valves and other fittings shall be maintained leak-free (less than 10,000 ppmv) during normal operation. [District Rule 4623, 5.6.1] Federally Enforceable Through Title V Permit
2. 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] Federally Enforceable Through Title V Permit
3. Reid vapor pressure of liquids stored shall not exceed 9.0 psia. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Truck unloading of tank shall be conducted in a manner such that spillage of liquids does not exceed 10 mL per hose disconnect. [District Rule 4624, 5.6 and District NSR Rule] Federally Enforceable Through Title V Permit
5. Permittee shall maintain records of daily amount of liquids received and transferred and Reid vapor pressure of liquids stored, and shall make such records readily available for District inspection for a period of five years. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. Permittee shall test stored liquid Reid vapor pressure using ASTM Test Method D-323, or Method D5191, at least once every twelve months. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Permittee shall maintain records of quarterly influent and effluent gas streams sampling for a period of five years and shall make such records readily available for District inspection upon request. [District Rule 2520, 9.3.2 and 9.4.2] Federally Enforceable Through Title V Permit
8. Inspection of all tank appurtenances, piping, flanges, valves and other fittings shall be conducted quarterly in accordance with EPA Method 21. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Corrective steps shall be taken at any time the operator observes excess spillage at hose disconnect. Hose disconnect liquid spillage shall be determined quarterly whenever truck unloading of the tank occurs. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Compliance with liquid spillage at hose disconnect shall be demonstrated by collecting all spillage 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
11. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and spillage inspections, B) leak determination method, C) findings, D) corrective action (including date each leak or excess spillage condition repaired), and E) inspector name and signature [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-5-1

**EXPIRATION DATE:** 08/31/2016

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-2 WITH VAPOR RETURN LINE ON TANK FILL (NOT IN USE), UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rules 2201] Federally Enforceable Through Title V Permit
2. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 10 mL per hose disconnect. [District Rules 2201 and 4624, 5.6] Federally Enforceable Through Title V Permit
3. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of five years. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323, or Method D5191, at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-6-1

**EXPIRATION DATE:** 08/31/2016

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-3 WITH UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rules 2201] Federally Enforceable Through Title V Permit
2. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 10 mL per hose disconnect. [District Rules 2201 and 4624, 5.6] Federally Enforceable Through Title V Permit
3. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of five years. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323, or Method D5191, at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-7-1

**EXPIRATION DATE:** 08/31/2016

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-4 UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rules 2201] Federally Enforceable Through Title V Permit
2. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 10 mL per hose disconnect. [District Rules 2201 and 4624, 5.6] Federally Enforceable Through Title V Permit
3. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of five years. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323, or Method D5191, at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-8-1

**EXPIRATION DATE:** 08/31/2016

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-5 UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rules 2201] Federally Enforceable Through Title V Permit
2. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 10 mL per hose disconnect. [District Rules 2201 and 4624, 5.6] Federally Enforceable Through Title V Permit
3. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of five years. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323, or Method D5191, at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-9-1

**EXPIRATION DATE:** 08/31/2016

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-6 UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rules 2201] Federally Enforceable Through Title V Permit
2. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 10 mL per hose disconnect. [District Rules 2201 and 4624, 5.6] Federally Enforceable Through Title V Permit
3. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of five years. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323, or Method D5191, at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-10-1

**EXPIRATION DATE:** 08/31/2016

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-7 WITH UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rules 2201] Federally Enforceable Through Title V Permit
2. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 10 mL per hose disconnect. [District Rules 2201 and 4624, 5.6] Federally Enforceable Through Title V Permit
3. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of five years. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323, or Method D5191, at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-11-1

**EXPIRATION DATE:** 08/31/2016

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-8 WITH VAPOR RETURN LINE ON TANK FILL (NOT IN USE), UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rules 2201] Federally Enforceable Through Title V Permit
2. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 10 mL per hose disconnect. [District Rules 2201 and 4624, 5.6] Federally Enforceable Through Title V Permit
3. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of five years. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
4. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323, or Method D5191, at least once every twelve months. [District Rule 2201] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT B

Previous Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: S-3303-0-1

EXPIRATION DATE: 08/31/2007

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) (Permits Required) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: ALON BAKERSFIELD REFINING  
Location: 2436 FRUITVALE AVENUE, BAKERSFIELD, CA 93308  
S-3303-0-1: Sep 30 2011 9:48AM - DEMARISF

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with Section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01), by using EPA method 9. If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or water mining activities shall comply with the requirements for fugitive dust control in SJVUAPCD District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout and trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01) [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE  
These terms and conditions are part of the Facility-wide Permit to Operate.

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permit shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (10/31/01); 4601, sections 5.1, 5.2, 5.4, 5.5, 6.1, and 6.2 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8061 (11/15/01); A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan when mandated by the regulation. [40 CFR Part 68] Federally Enforceable Through Title V Permit
43. This facility is part of stationary source S-33, and is part of the Area 1 refinery portion of S-33. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Volatile organic compound (VOC) emissions from entire Area 1 refinery portion of stationary source S-33 shall not exceed 2,476.9 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
45. This source is not a petroleum refinery or a chemical plant, as defined in District Rule 4451, Section 3.0 (Amended December 17, 1992) and District Rule 4452, Section 3.0 (Amended December 17, 1992). Therefore, the requirements of District Rule 4451, Section 5.0, and District Rule 4452, Section 5.0, do not apply to this source. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
46. On December 31, 2002, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-1-2

**EXPIRATION DATE:** 08/31/2007

**SECTION:** 27 **TOWNSHIP:** 29S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

TRUCK LOADING OPERATION INCLUDING 36 BOTTOM LOADING ARMS, 6 TOP LOADING ARMS AND VAPOR RECOVERY ARMS SERVED BY VAPOR RECOVERY SYSTEM LISTED ON PERMIT S-33-41

## PERMIT UNIT REQUIREMENTS

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1. Delivery vessels loaded at this facility shall be vapor tight and shall be so certified by the State Fire Marshall. [District Rule 4621] Federally Enforceable Through Title V Permit
2. Loading arms shall establish a leak (as defined in Rule 4624) free seal with delivery vessels. [District Rule 4624] Federally Enforceable Through Title V Permit
3. Top loading arms shall be used to load fuel oil and residual oil only. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Throughput of fuel oil and vacuum residue from this permit unit this shall not exceed 1,056,000 gallons per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Vapor return arms shall be connected during diesel loading if TVP exceeds 0.008 psia at loading conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Vapor return arms shall be connected during diesel loading if vessel being loaded previously carried petroleum liquid with TVP greater than 0.008 psia at loading conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Vapor return arms shall be connected during gas oil, fuel oil, heavy fuel oil or vacuum residue loading with TVP greater than 0.0012 psia at loading conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Vapor return arms shall be connected during gas oil, fuel oil, heavy fuel oil or vacuum residue loading if vessel being previously loaded carried petroleum liquid with TVP greater than 0.0012 psia at loading conditions. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Hose couplers shall be of dry-break type to prevent liquid spill upon disconnection. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Liquid and vapor hoses, couplers, fittings and piping shall be maintained in a leak (as defined in 4624) free condition. [District Rule 4624] Federally Enforceable Through Title V Permit
11. VOC emission rate, excluding leakage, shall not exceed 2.0 lb/hr from this permit unit. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Gasoline loading leakage and spillage shall not exceed 4.6 lb/day from this permit unit. [District NSR Rule] Federally Enforceable Through Title V Permit
13. 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, and Kern County Rule 108.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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14. Operator shall maintain all records of required monitoring data and support information for inspection for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. 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. [60 CFR 60.502(b), District Rules 2520, 9.3.2 and 4624, 5.1.1 and Kern County Rule 413] Federally Enforceable Through Title V Permit
16. 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. [40 CFR 60.502(h), District Rule 4624, 5.2 and Kern County Rule 413] Federally Enforceable Through Title V Permit
17. The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed unless the container is equipped with a permanent submerged fill pipe and an ARB certified Phase I vapor recovery system, which is maintained and operated according to the manufacturers specifications. [District Rule 4621, 5.1.1] Federally Enforceable Through Title V Permit
18. 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 I 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. [District Rules 4624, 5.3] Federally Enforceable Through Title V Permit
19. 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, 5.2.1 & 5.2.2, Health & Safety Code, section 41962, and CCR, Title 17 section 94004] Federally Enforceable Through Title V Permit
20. The test method to determine vapor tightness of delivery vessels owned or operated by this facility shall be EPA Method 27. [District Rule 4621, 6.2.3 and 40 CFR 60.503(c)] Federally Enforceable Through Title V Permit
21. Construction, reconstruction (as defined in District Rule 4001, amended January 19, 1995), or expansion of any top loading facility shall not be allowed. [District Rule 4624, 5.5] Federally Enforceable Through Title V Permit
22. 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 Rule 4624, 5.4; and Kern County Rule 413] Federally Enforceable Through Title V Permit
23. 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, or smell. [District Rule 2520, 9.3.2, 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit
24. 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 drainage inspections at disconnect conducted on a quarter of the loading arms every calendar quarter. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall change to quarterly for all loading arms. If no excess drainage is found after four consecutive quarterly inspection of all loading arms, the inspection frequency shall return to inspections of a quarter of the loading arms every calendar quarter. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. 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
26. Each detected leak shall be repaired within 15 calendar days of detection. [40 CFR 60.502(j)] 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.



27. 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 15 days), and E) inspector name and signature. [District Rule 2520, 9.4.3 and 40 CFR 60.505(c)] Federally Enforceable Through Title V Permit
28. 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  $\pm 2.5$  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 40 CFR 60.503(d)] Federally Enforceable Through Title V Permit
29. 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
30. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: Kern County Rule 413, District Rules 4621(as amended May 20, 1993), sections 5.1.3 and 5.2, and 4624 (as amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
31. Compliance with permit conditions in the Title V permit shall be deemed compliance with the requirements of 40CFR60, Subpart XX. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
32. Formerly S-33-45-0.

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-2-1

**EXPIRATION DATE:** 08/31/2007

**SECTION:** 27 **TOWNSHIP:** 29S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

12,000 GALLON GASOLINE ADDITIVE TANK INCLUDING DISTRIBUTION PUMPS AND PIPING TO GASOLINE LOADING OPERATION

## PERMIT UNIT REQUIREMENTS

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1. Only additives for motor vehicle fuel shall be stored in tank. [District NSR Rule] Federally Enforceable Through Title V Permit
2. True vapor pressure of additives stored shall not exceed 0.34 psia. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All vapors displaced from tank shall be returned to truck vapor space when additive is received. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All tank openings and fittings shall remain gas tight (as defined in Rule 4623) during normal operation. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Additives shall be piped only to existing gasoline loading operation. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Volatile organic compound (VOC) emissions shall not exceed 0.2 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The operator shall keep accurate records of types and manufacturer's True Vapor Pressure specification of liquids stored to verify continued exemption from District Rule 4623 (amended 12/20/02). [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Operator shall maintain all records of required monitoring data and support information for inspection for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Formerly S-33-128-0.

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-3-3

**EXPIRATION DATE:** 08/31/2007

**SECTION:** 27 **TOWNSHIP:** 29S **RANGE:** 27E

**EQUIPMENT DESCRIPTION:**

TANKER TRUCK PRODUCT OFF-LOADING PAD WITH ELECTRIC UNLOADING PUMP, ELECTRIC SUMP PUMP, DEAERATOR, ROTARY VANE METER, 2 LIQUID PRODUCT CONNECTIONS/LINES TO TANKS S-33-41 AND S-33-46, PIPING, AND VARIOUS FUGITIVE COMPONENTS

## PERMIT UNIT REQUIREMENTS

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1. This equipment shall not include provisions for loading of tanker trucks. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Vapor return line vents on tanker truck storage vessels shall be open only during gasoline off-loading, and shall be closed immediately upon completion of gasoline off-loading. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Tanker truck hatches shall be closed at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. There shall be no more than 25 tanker truck unloadings per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Total liquid drainage/leaks from all hose disconnects shall not exceed 20 ml per tanker truck. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Permittee shall keep accurate daily records of tanker truck unloadings, liquid types, and liquid throughputs. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Records required by this permit shall be retained on site for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Unloading 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. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. During the unloading of delivery vehicles, operator shall perform and record the results of quarterly leak inspections of the unloading equipment. If none of the components are found to be leaking during five consecutive quarterly inspections, the leak inspection frequency may be changed from quarterly to semiannual. However, if one or more of the components are found to leak during a semiannual inspection, the inspection frequency shall change back to quarterly. Leak inspections shall be conducted using sight, sound, smell and instrument methods to detect leaks. Instrument detection shall be measured at a distance of one centimeter from the potential source. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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10. 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 quarterly drainage inspections at disconnect. If no excess drainage is found during five consecutive quarterly inspections, the drainage inspection frequency may be changed from quarterly to annual. However, if one or more excess drainage condition is found during an annual inspection, the inspection frequency shall change back to quarterly. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. 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
12. 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 (including date each leak or excess drainage condition repaired), and E) inspector name and signature. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Formerly S-33-355-1.

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-4-2

**EXPIRATION DATE:** 08/31/2007

**EQUIPMENT DESCRIPTION:**

5,000 GALLON GASOLINE ADDITIVE STORAGE TANK #5000-1 VENTED TO CARBON CANISTERS INCLUDING LIQUID PIPING FROM GROUNDWATER REMEDIATION OPERATION

## PERMIT UNIT REQUIREMENTS

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1. Tank shall vent to two 175 lb vapor phase carbon adsorption canisters in series, capable of at least 90% VOC removal. [District NSR Rule] Federally Enforceable Through Title V Permit
2. All tank appurtenances, piping, flanges, valves and other fittings shall be maintained leak-free (less than 10,000 ppmv) during normal operation. [District Rule 4623] Federally Enforceable Through Title V Permit
3. Reid vapor pressure of liquids stored shall not exceed 9.0 psia. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Permanent sampling ports adequate for extraction of influent and effluent gas stream grab samples shall be provided. [District Rule 1081] Federally Enforceable Through Title V Permit
5. Ongoing compliance with VOC emission rate and control efficiency requirements shall be demonstrated by sampling (at least once per quarter) influent and effluent gas streams with an FID, PID, or other District-approved VOC detection device. [District Rule 1081] Federally Enforceable Through Title V Permit
6. Truck unloading of tank shall be conducted in a manner such that spillage of liquids does not exceed 75 ml. per hose disconnect. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Permittee shall maintain records of daily amount of liquids received and transferred and Reid vapor pressure of liquids stored, and shall make such records readily available for District inspection for a period of five years. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Permittee shall test stored liquid Reid vapor pressure using ASTM Test Method D-323 at least once every twelve months. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Volatile organic compound (VOC) emissions from entire Area 1 refinery shall not exceed 2,476.9 lbs/day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Permittee shall maintain records of quarterly influent and effluent gas streams sampling for a period of five years and shall make such records readily available for District inspection upon request. [District Rule 2520, 9.3.2 and 9.4.2] Federally Enforceable Through Title V Permit
11. Inspection of all tank appurtenances, piping, flanges, valves and other fittings shall be conducted quarterly in accordance with EPA Method 21. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Corrective steps shall be taken at any time the operator observes excess spillage at hose disconnect. Hose disconnect liquid spillage shall be determined quarterly whenever truck unloading of the tank occurs. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Compliance with liquid spillage at hose disconnect shall be demonstrated by collecting all spillage 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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14. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and spillage inspections, B) leak determination method, C) findings, D) corrective action (including date each leak or excess spillage condition repaired), and E) inspector name and signature [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-5-0

**EXPIRATION DATE:** 08/31/2007

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-2 WITH VAPOR RETURN LINE ON TANK FILL (NOT IN USE), UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rule 2201]
3. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 75 ml. per hose disconnect. [District Rule 2201]
4. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of two years. [District Rule 1070]
5. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323 at least once every twelve months. [District Rule 2201]
6. Volatile organic compound (VOC) emissions from entire Area 1 refinery shall not exceed 2476.9 lbs/day. [District Rule 2201]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-6-0

**EXPIRATION DATE:** 08/31/2007

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-3 WITH UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rule 2201]
3. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 75 ml. per hose disconnect. [District Rule 2201]
4. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of two years. [District Rule 1070]
5. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323 at least once every twelve months. [District Rule 2201]
6. Volatile organic compound (VOC) emissions from entire Area 1 refinery shall not exceed 2476.9 lbs/day. [District Rule 2201]

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-7-0

**EXPIRATION DATE:** 08/31/2007

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-4 UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rule 2201]
3. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 75 ml. per hose disconnect. [District Rule 2201]
4. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of two years. [District Rule 1070]
5. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323 at least once every twelve months. [District Rule 2201]
6. Volatile organic compound (VOC) emissions from entire Area 1 refinery shall not exceed 2476.9 lbs/day. [District Rule 2201]

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

**San Joaquin Valley  
Air Pollution Control District**

**PERMIT UNIT:** S-3303-8-0

**EXPIRATION DATE:** 08/31/2007

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-5 UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

**PERMIT UNIT REQUIREMENTS**

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rule 2201]
3. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 75 ml. per hose disconnect. [District Rule 2201]
4. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of two years. [District Rule 1070]
5. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323 at least once every twelve months. [District Rule 2201]
6. Volatile organic compound (VOC) emissions from entire Area 1 refinery shall not exceed 2476.9 lbs/day. [District Rule 2201]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-9-0

**EXPIRATION DATE:** 08/31/2007

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-6 UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rule 2201]
3. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 75 ml. per hose disconnect. [District Rule 2201]
4. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of two years. [District Rule 1070]
5. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323 at least once every twelve months. [District Rule 2201]
6. Volatile organic compound (VOC) emissions from entire Area 1 refinery shall not exceed 2476.9 lbs/day. [District Rule 2201]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** S-3303-10-0

**EXPIRATION DATE:** 08/31/2007

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-7 WITH UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rule 2201]
3. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 75 ml. per hose disconnect. [District Rule 2201]
4. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of two years. [District Rule 1070]
5. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323 at least once every twelve months. [District Rule 2201]
6. Volatile organic compound (VOC) emissions from entire Area 1 refinery shall not exceed 2476.9 lbs/day. [District Rule 2201]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT: S-3303-11-0**

**EXPIRATION DATE: 08/31/2007**

**EQUIPMENT DESCRIPTION:**

5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-8 WITH VAPOR RETURN LINE ON TANK FILL (NOT IN USE), UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Reid vapor pressure of additive stored shall not exceed 0.27 psia. [District Rule 2201]
3. Truck unloading to tank shall be conducted in a manner such that spillage of liquids does not exceed 75 ml. per hose disconnect. [District Rule 2201]
4. Permittee shall maintain records of daily amount of additive received and transferred to loading operation and accurate records of the Reid vapor pressure of additive stored, and shall make such records readily available for District inspection for a period of two years. [District Rule 1070]
5. Permittee shall test the stored additive Reid vapor pressure using ASTM Test Method D-323 at least once every twelve months. [District Rule 2201]
6. Volatile organic compound (VOC) emissions from entire Area 1 refinery shall not exceed 2476.9 lbs/day. [District Rule 2201]

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

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# ATTACHMENT C

Detailed Facility List

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**Detailed Facility Report**  
For Facility=3303  
Sorted by Facility Name and Permit Number

<b>ALON BAKERSFIELD REFINING</b> 2436 FRUITVALE AVENUE BAKERSFIELD, CA 93308	<b>FAC #</b> STATUS: TELEPHONE:	<b>S 3303</b> A	<b>TYPE:</b> TOXIC ID:	<b>TitleV</b> 50250	<b>EXPIRE ON:</b> AREA: INSP. DATE:	<b>08/31/2007</b> 103 / 08/12
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-3303-1-2	1,703 HP	3020-01 H	1	1,030.00	1,030.00	A	TRUCK LOADING OPERATION INCLUDING 36 BOTTOM LOADING ARMS, 6 TOP LOADING ARMS AND VAPOR RECOVERY ARMS SERVED BY VAPOR RECOVERY SYSTEM LISTED ON PERMIT S-33-41
S-3303-2-1	12,000 GALLONS	3020-05 B	1	93.00	93.00	A	12,000 GALLON GASOLINE ADDITIVE TANK INCLUDING DISTRIBUTION PUMPS AND PIPING TO GASOLINE LOADING OPERATION
S-3303-3-3	35 HP OFF-LOADING	3020-01 B	1	117.00	117.00	A	TANKER TRUCK PRODUCT OFF-LOADING PAD WITH ELECTRIC UNLOADING PUMP, ELECTRIC SUMP PUMP, DEAERATOR, ROTARY VANE METER, 2 LIQUID PRODUCT CONNECTIONS/LINES TO TANKS S-33-41 AND S-33-46, PIPING, AND VARIOUS FUGITIVE COMPONENTS
S-3303-4-2	5,000 Gallon tank	3020-05 A	1	75.00	75.00	A	5,000 GALLON GASOLINE ADDITIVE STORAGE TANK #5000-1 VENTED TO CARBON CANISTERS INCLUDING LIQUID PIPING FROM GROUNDWATER REMEDIATION OPERATION
S-3303-5-0	5,000 gal	3020-05 B	1	93.00	93.00	A	5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-2 WITH VAPOR RETURN LINE ON TANK FILL (NOT IN USE), UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1
S-3303-6-0	5,000 gal	3020-05 B	1	93.00	93.00	A	5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-3 WITH UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1
S-3303-7-0	5,000 gal	3020-05 B	1	93.00	93.00	A	5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-4 UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1
S-3303-8-0	5,000 gal	3020-05 B	1	93.00	93.00	A	5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-5 UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1
S-3303-9-0	5,000 gal	3020-05 B	1	93.00	93.00	A	5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-6 UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1
S-3303-10-0	5,000 gal	3020-05 B	1	93.00	93.00	A	5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-7 WITH UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1
S-3303-11-0	5,000 gal	3020-05 B	1	93.00	93.00	A	5000 GALLON GASOLINE ADDITIVE STORAGE TANK 5000-8 WITH VAPOR RETURN LINE ON TANK FILL (NOT IN USE), UP TO TWO INJECTION PUMPS, AND PIPING FROM INJECTION PUMP(S) TO GASOLINE LOADING OPERATION S-3303-1

Number of Facilities Reported: 1

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# ATTACHMENT D

## Comments and Responses

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The facility submitted written comments by letter on December 19, 2011.

**Facility Comment #1:**

Please delete condition 1 from PTO S-3303-1-5, since this condition is redundant with condition 19.

***District Response to Facility Comment #1***

*The requested change has been made.*

**Facility Comment #2:**

Please revised various specified permit conditions that restrict total vapor pressure to either 0.27 psia or 0.34 psia to allow storage of organic liquids with TVP up to 1.5 psia. These storage tanks are allowed, under Rule 4623, to store organic liquids with TVP up to 1.5 psia.

***District Response to Facility Comment #2:***

*The specified conditions are rooted in the District NSR Rule. Modifications to NSR conditions must be made through the ATC application process.*

**Facility Comment #3:**

Please incorporate the use of ASTM Method D5191 as an alternative to method D323 for measuring Reid vapor pressure in specified conditions. ASTM D5191 is more accurate for low TVP organic liquids.

***District Response to Facility Comment #3:***

*The proposed alternative test method has been incorporated into the specified conditions, which now read: "True vapor pressure (TVP) shall be measured using Reid vapor pressure (RVP) ASTM Method D323-94, or Method D5191, and converting the RVP to TVP at the tank's maximum organic liquid storage temperature."*

US EPA submitted written comment electronically on December 19, 2011.

**EPA Comment #1:**

The CAM analysis fails to address unit S-3303-1-5, which is vented to a vapor collection and control system. Furthermore, condition 11 limits emissions to 2.0 lb/hr, so it appears this unit is subject to CAM and should be addressed in a reevaluation of the CAM requirements.

**District Response to EPA Comment #1:**

*In our preliminary decision to renew the TV permit for this facility, we have concluded that vapor control systems serving refinery tanks are "inherent process equipment" pursuant to 40 CFR Part 64. As such, the underlying emissions units are not considered to be equipped with a "control device" and therefore are not subject to CAM requirements. We believe that this analysis is accurate and we offer the following additional justification below.*

*CAM is required if an emission unit is subject to emission limit or standard to the pollutant of concern, uses a control device to comply with the emission limit or standard, and has a potential pre-control emissions greater than 10 ton/year. While most refinery tanks equipped with a vapor control system include an emission limit or standard and have uncontrolled potential to emit greater than 10 ton/year, we have concluded that the vapor control systems that they are equipped with do not meet the criteria of control device as defined in 40 CFR part 64.*

*The definition of control device from 40 CFR Part 64 is as follows (emphasis added):*

*Control device means equipment, other than inherent process equipment, that is used to destroy or remove air pollutant(s) prior to discharge to the atmosphere. The types of equipment that may commonly be used as control devices include, but are not limited to, fabric filters, mechanical collectors, electrostatic precipitators, inertial separators, afterburners, thermal or catalytic incinerators, adsorption devices (such as carbon beds), condensers, scrubbers (such as wet collection and gas absorption devices), selective catalytic or non-catalytic reduction systems, flue gas recirculation systems, spray dryers, spray towers, mist eliminators, acid plants, sulfur recovery plants, injection systems (such as water, steam, ammonia, sorbent or limestone injection), and combustion devices independent of the particular process being conducted at an emissions unit (e.g., the destruction of emissions achieved by venting process emission streams to flares, boilers or process heaters). For purposes of this part, a control device does not include passive control measures that act to prevent pollutants from forming, such as the use of seals, lids, or roofs to prevent the release of pollutants, use of low-polluting fuel or feedstocks, or the use of combustion or other process design features or characteristics. If an applicable requirement establishes that particular equipment which otherwise meets this definition of a*

*control device does not constitute a control device as applied to a particular pollutant-specific emissions unit, then that definition shall be binding for purposes of this part.*

*It is important to note that this definition includes an exemption for "inherent process equipment". Inherent process equipment is by definition not a control device. Emission units equipped with inherent process equipment are not subject to the requirements of CAM.*

*40 CFR Part 64 defines inherent process equipment as (emphasis added):*

*Inherent process equipment means equipment that is necessary for the proper or safe functioning of the process, or material recovery equipment that the owner or operator documents is installed and operated primarily for purposes other than compliance with air pollution regulations. Equipment that must be operated at an efficiency higher than that achieved during normal process operations in order to comply with the applicable emission limitation or standard is not inherent process equipment. For the purposes of this part, inherent process equipment is not considered a control device.*

*Please note that the above definition requires that inherent process equipment must be used "... for the proper or safe operation of the process ...". It is important to note that the equipment need not be used solely for the proper or safe operation of the process. Such systems could be used for compliance with regulations as well.*

*We have concluded that vapor control systems installed on oil refinery tanks and other process equipment are inherent process equipment (and by definition not a control device) for the reasons stated below.*

- Vapor vents are delivered to the refinery fuel gas system from where they are used as fuel for refinery process heaters and boilers. Since the use of this vapor offsets the purchase of supplemental fuels such as natural gas, the recovery and use of the vapor as fuel is an important element of the efficiency and economics of oil refining*
- Vapor recovery and control systems in oil refineries serve to provide safe operation of the refinery by avoiding release and accumulation of combustibile and explosive vapors within the refinery and the surrounding area.*
- Vapor control systems in oil refineries reduce emissions of H<sub>2</sub>S and other toxic substances from tanks and other permit units and, as such, assure worker safety as well as compliance with OSHA and other related regulatory requirements.*

- *Even though not required by District rules, facilities which handle crude oil and other petroleum products often install vapor control on storage tanks for corrosion prevention purposes since tank vapor control systems minimize air intrusion into the vapor space and thus reduce corrosion of the tank interior.*

*For all of the reasons stated above, we believe that tank vapor control systems are inherent to the oil refining process. As such we believe that these systems meet the criteria for "inherent process systems", and as such are not a control device for the purposes of CAM applicability. Therefore, we do not believe that the emission units that are served by such systems are subject to the requirements of CAM.*

*Notwithstanding the above, we agree to work cooperatively with EPA Region IX to address CAM applicability issues on a programmatic basis in the future.*