



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

OCT 11 2012

Brooks Neighbors  
Tesoro Logistics Operations LLC  
19100 Ridgewood Parkway  
San Antonio, TX 78259

**Re: Notice of Final Action - Title V Permit  
District Facility # N-845  
Project # N-1110694**

Dear Mr. Neighbors:

The District has issued the Final Title V Permit for Tesoro Logistics Operations LLC. The preliminary decision for this project was made on August 8, 2012. 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 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. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner  
Director of Permit Services

DW:WMS/st

Enclosures

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

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

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1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
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**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



OCT 11 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  
District Facility # N-845  
Project # N-1110694**

Dear Mr. Rios:

The District has issued the Final Title V Permit for Tesoro Logistics Operations LLC. The preliminary decision for this project was made on August 8, 2012. 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 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. Rupl Gill, Permit Services Manager, at (209) 557-6400.

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David Warner  
Director of Permit Services

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**Southern Region**  
34946 Flyover Court  
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OCT 11 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  
District Facility # N-845  
Project # N-1110694**

Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for Tesoro Logistics Operations LLC. The preliminary decision for this project was made on August 8, 2012. 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 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. Ruphi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner  
Director of Permit Services

DW:WMS/st

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Executive Director/Air Pollution Control Officer

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**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT  
NOTICE OF FINAL DECISION TO ISSUE  
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 initial Federally Mandated Operating Permit to Tesoro Logistics Operations LLC for its petroleum bulk terminal located at 3003 Navy Drive in Stockton, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1110694, 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. Rupi Gill, Permit Services Manager, at (209) 557-6400, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CALIFORNIA 95356-8718.

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

**Proposed Initial Title V Engineering Evaluation  
Tesoro Logistic Operations LLC  
N-845**

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## TITLE V APPLICATION REVIEW

**Engineer:** Wai-Man So  
**Revised Date:** October 10, 2012

**Facility Number:** N-845  
**Facility Name:** Tesoro Logistics Operations LLC  
**Mailing Address:** 19100 Ridgewood Parkway  
San Antonio, TX 78259

**Contact Name:** Brooks Neighbors  
**Title:** Environmental Compliance Specialist – Logistics  
**Phone:** (210) 626 – 6327  
**Email:** brooks.d.neighbors@tsocorp.com

**Responsible Official:** Rick D. Weyen  
**Title:** Vice President, Operations

**Project # :** N-1110694  
**Deemed Complete:** April 15, 2011

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### I. PROPOSAL

Tesoro Logistics Operations LLC (hereafters Tesoro) is proposing that an initial Title V permit be issued for its existing petroleum bulk terminal located in Stockton, CA. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

### II. FACILITY LOCATION

Tesoro is located at 3003 Navy Drive in Stockton, California.

### III. EQUIPMENT LISTING

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

A summary of the exempt equipment categories, which describe the insignificant activities or equipment at the facility not requiring a permit, is shown in Attachment C. This equipment is not exempt from facility-wide requirements.

#### **IV. GENERAL PERMIT TEMPLATE USAGE**

The applicant is not requesting the use of SJV-UM-03 Facility-wide Umbrella General Permit Template.

#### **V. SCOPE OF EPA AND PUBLIC REVIEW**

The applicant is not requesting the use of SJV-UM-03 general template. Therefore, all federally enforceable conditions listed in Appendix A of this document are subjected to EPA and public review.

#### **VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES**

The applicant is not requesting the use of any general permit templates.

#### **VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES**

- District Rule 1070, Inspections (Amended December 17, 1992)
- District Rule 1080, Stack Monitoring (Amended December 17, 1992)
- 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 2020, Exemptions (Amended December 20, 2007)
- 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 2201, New and Modified Stationary Source Review Rule (Amended April 21, 2011)

- District Rule 2520, Federally Mandated Operating Permits (Amended June 21, 2011)
- District Rule 4001, New Source Performance Standards (Amended April 14, 1999)
- District Rule 4002, National Emission Standards for Hazardous Air Pollutants (Amended May 20, 2004)
- District Rule 4101, Visible Emissions (Amended February 17, 2005)
- District Rule 4601, Architectural Coatings (Amended December 17, 2009)
- District Rule 4623, Storage of Organic Liquids (Amended May 19, 2005)
- District Rule 4624, Transfer of Organic Liquid (Amended December 20, 2007)
- District Rule 8021, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Construction, Demolition, Excavation, and Extraction Activities (Amended August 19, 2004)
- District Rule 8031, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Handling and Storage of Bulk Materials (Amended August 19, 2004)
- District Rule 8041, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Carryout and Trackout (Amended August 19, 2004)
- District Rule 8051, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Open Area (Amended August 19, 2004)
- District Rule 8061, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Paved and Unpaved Roads (Amended August 19, 2004)
- District Rule 8071, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Unpaved Vehicle/Equipment Areas (Amended August 19, 2004)
- 40 CFR Part 60, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978



- 40 CFR Part 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after May 18, 1978, and Prior to July 23, 1984
- 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984
- 40 CFR Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR Part 63, Subpart R, Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)
- 40 CFR Part 63, Subpart BBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
- 40 CFR Part 64, Subpart C, Compliance Assurance Monitoring (CAM)
- 40 CFR Part 82, Subpart B and F, Protection of Stratospheric Ozone, Servicing of Motor Vehicle Air Conditioners, Recycling and Emissions Reduction

## VIII. 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.

This facility is subject to the following rules that are not currently federally enforceable:

- District Rule 4102, Nuisance (Amended December 17, 1992)

For this facility, condition 39 of the requirements for facility-wide permit N-845-0-1 are based on the rule listed above and are not Federally Enforceable through Title V.

**IX. COMPLIANCE**

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

The applicant is not proposing to use any general permit templates.

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

1) District Rule 1070 – Inspections

This rule requires that the inspections shall be made by the enforcement agency for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations. Further, the District has the authority to require recordkeeping, to make inspections and to conduct tests of air pollution sources. District Rule 1070 has been submitted to the EPA to replace San Joaquin County Rule 107 that is in the State Implementation Plan (SIP). District Rule 1070 is at least as stringent as San Joaquin County Rule 107 as shown in the following comparison presented in Table 1:

Table 1: Comparison of District Rule 1070 to San Joaquin County Rule 107

REQUIREMENTS	District Rule 1070	San Joaquin County Rule 107
Inspections shall be made by the enforcement agency for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations.	X	X
The District also has the authority to require record keeping, to make inspections and to conduct tests of air pollution sources.	X	X

Compliance with the requirements of this rule will be ensured with the listed permit condition for the associated permits in the table below:

Permit Number	Condition in Current PTO	Condition in Title V permits
N-845-6-2	8	21
N-845-23-1	6	11

2) District Rule 1080, Stack Monitoring

This rule grants the APCO authority to request the installation, use, maintenance, and inspection of continuous monitoring equipment. This rule also specifies the performance standards for the equipment and

administrative recordkeeping, reporting, and violation and equipment breakdown notification requirements.

According to the additional information provided by the applicant during the public notice commenting period, the District concluded that the facility is not currently subject to the requirements. However, the facility shall install the continuous monitoring equipment by August 1, 2013. See detailed discussion in Section XII, Attachment F of this document.

3) District Rule 1081 – Source Sampling

This rule ensures that any source operation which emits or may emit air contaminants provides adequate and safe facilities for use in sampling to determine compliance. This rule also specifies methods and procedures for source testing, sample collection, and compliance determination.

Compliance with the requirements of this rule will be ensured with the listed permit conditions for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-22-2	13, 14, and 16

4) District Rule 1100 – Equipment Breakdown

This rule defines a breakdown condition and the procedures to follow if one occurs. The corrective action, the issuance of an emergency variance, and the reporting requirements are also specified. Sections 6.0 and 7.0 prescribe breakdown procedures and reporting requirements. District Rule 1100 has been submitted to the EPA to replace San Joaquin County Rule 110 that is in the State Implementation Plan (SIP). District Rule 1100 is at least as stringent as the county SIP rule addressing breakdowns, as shown in the following comparison presented in Table 2:

Table 2: Comparison of District Rule 1100 to San Joaquin County Rule 110

REQUIREMENTS	District Rule 1100	San Joaquin County Rule 110
A breakdown occurrence must be reported as soon as reasonably possible but no later than 1 hour after detection.	X	X
A variance must be obtained if the occurrence will last longer than a production run or 24 hours, whichever is shorter (96 hours for CEM systems).	X	X
A report must be submitted to the APCO within 10 days of the correction of the breakdown occurrence which includes:	X	X

REQUIREMENTS	District Rule 1100	San Joaquin County Rule 110
A statement that the breakdown condition has been corrected, together with the date of correction and proof of compliance.	X	X
A specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition.	X	X
A description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future.	X	X
Pictures of the equipment or controls which failed if available.	X	X

Compliance with the requirements of this rule will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Condition in Current PTO	Condition in Facility-wide Permit N-845-0-1
N-845-6-2	6 and 7	1 and 2
N-845-22-2	2	1 and 2

5) District Rule 1160 – Emission Statements

The purpose of this rule is to provide the District with an accurate accounting of emissions from significant sources with which the District and California Air Resources Board (ARB) can compile an accurate inventory. Section 5.0 requires the owner or operator of any stationary source to provide the District with a written emissions statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NOx) from that source. The District waives this requirement for sources emitting less than 25 tons per year of these pollutants if the District provides the ARB with an emissions inventory of sources emitting greater than 10 tons per year of NOx or ROGs based on the use of emission factors acceptable to the ARB.

Compliance with the requirements of this rule will be ensured with the listed permit condition for the facility-wide permit, N-845-0-1 in the table below:

Permit Number	Permit Condition Number
N-845-0-1	3

6) District Rule 2010 – Permits Required

District Rule 2010 sections 3.0 and 4.0 requires any person building, modifying or replacing any operation that may cause the issuance of air contaminants to apply for an Authority to Construct (ATC) from the District in

advance. The ATC will remain in effect until the Permit to Operate (PTO) is granted.

Compliance with the requirements of this rule will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	4

7) District Rule 2020 – Exemptions

District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions.

Current District Rule 2020 has been submitted to the EPA to replace SIP approved December 20, 2007 version of Rule 2020. The comparison of the current District Rule and the previous version, presented below in Table 3. indicate that the current District Rule is at least as stringent as the previous SIP approved version of this rule.

Table 3: Comparison of District Rule 2020 (12/20/07) to Rule 2020 (8/18/11)

REQUIREMENTS	District Rule 2020 (12/20/07)	District Rule 2020 (8/18/11)
An ATC or PTO is not required for listed exempt equipment.	X	X
Conditions are stated under which listed exempt equipment will require an ATC or PTO.	X	X
Record keeping is required to verify and maintain exemption, when the exemption is based on a maximum daily limitation.	X	X
A compliance schedule is stated for equipment which loses exemption from permitting, necessitating submission of a PTO application.	X	X

Compliance with the requirements of this rule will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	4

8) District Rule 2031 – Transfer of Permits

This rule requires a permit to operate or an authority to construct shall not be transferable, whether by operation of law or otherwise, from one location to

another, from one piece of equipment to another, or from one person to another, unless a new application is filed with and approved by the APCO.

Compliance with the requirements of this rule will be ensured with the listed permit conditions for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	6

9) District Rule 2040 – Applications

The purpose of this rule is to explain the procedures for filing, denying, and appealing the denial of applications for an Authority to Construct or a Permit to Operate.

Compliance with the requirements of this rule will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	7

10) District Rule 2070 – Standards for Granting Applications

The purpose of this rule is to explain the standards by which an APCO may deny an application for an Authority to Construct or Permit to Operate. Any source operation must be constructed and operated in accordance with Rule 2201 (New and Modified Stationary Source Review Rule), Rule 4001 (New Source Performance Standards), and Rule 4002 (National Emissions Standards for Hazardous Air Pollutants), the Authority to Construct, and the Permit to Operate.

Compliance with the requirements of this rule will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	5

11) District Rule 2080 – Conditional Approval

The purpose of this rule is to grant authority to the APCO to issue or revise specific written conditions on an Authority to Construct or a Permit to Operate to assure compliance with air contaminant emission standards or limitations.

Compliance with the requirements of this rule will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	5

12) District Rule 2201 – New and Modified Stationary Source Review (NSR) Rule

Permit units N-845-1, N-845-4, N-845-5, N-845-6, N-845-22, and N-845-23 were subject to the District's NSR Rule upon application for Authority to Construct (ATC) for these units, but only N-845-6 and N-845-23 have NSR conditions listed on the current permits.

Permit unit N-845-10 were not subject to the District's NSR Rule requirements because this permit unit was installed prior to the date that the District permit was required at the time of installation.

In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

The following table summarizes the permit unit number, description of the equipment, NSR condition in the current PTOs, and NSR condition in the Title V permits.

Permit Units	Description	Condition in Current PTO	Condition in Title V Permit
N-845-1	Gasoline Storage tank	None	None
N-845-4	Gasoline Storage tank	None	None
N-845-5	Gasoline Storage tank	None	None
N-845-6	Loading Rack	5	1
N-845-10	Transmix Storage tank	None	None
N-845-22	Vapor Recovery System	None	None
N-845-23	Diesel Lubricity Additive Storage tank	2, 4, and 5	1, 2, and 10

13) District Rule 2520 – Federally Mandated Operating Permits

The purpose of this rule include: providing an administrative mechanism for issuing, renewing, revising, and revoking operating permit sources of air contaminants in accordance with requirements of 40 CFR Part 70 and providing an administrative mechanism for incorporating New and Modified Source Review (NSR) requirements into a Part 70 permit.

Section 5.2 requires a permittee to submit applications for Title V permit renewal at least six months prior to permit expiration.

Compliance with the requirements of this section will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	37

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Title V permit:

Section 9.1.1 of District Rule 2520 requires all conditions on Title V permits specify a reference of the origin of an authority for each term or condition, and identify any difference in form as compared to the applicable requirements upon which the term or condition is based.

Compliance with the requirements of this section will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	38

Section 9.3 requires that each permit shall contain all emissions monitoring and analysis procedures or test methods required under the applicable requirements, periodic monitoring to yield reliable data for the relevant time period that are representative of the source's compliance with the permit where applicable requirements do not require periods testing or instrumental or non-instrumental monitoring.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-6-2	15 and 16
N-845-10-1	24
N-845-22-2	22 and 23

Section 9.4 contains requirements to incorporate all applicable recordkeeping requirements into the Title V permit. This section also specifies records of any required monitoring and support data be kept for a period of five years.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:



Permit Number	Permit Condition Number
N-845-0-1	8 and 9
N-845-22-2	24

Section 9.5 requires the submittal of monitoring reports at least every six months. Prompt reporting of deviations from permitting requirements, including those attributable to upset conditions is also required. The responsible official must certify all required reports.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	10 and 11

Section 9.7 states that the Title V permit must also contain a severability clause in case of a court challenge.

Compliance with the requirements of this section will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	12

Section 9.8 contains requirements for provisions in the Title V permit stating 1) the permittee must comply with all permit conditions; 2) the permitted activity should not be reduced in order to comply with the permit conditions. Further, this reasoning shall not be used as a defense in an enforcement action, 3) the permit may be revoked, modified, reissued, or reopened for cause, 4) the Title V permit does not reflect any property rights, and 5) the permittee will furnish the District with any requested information to determine compliance with the conditions of the Title V permit.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	5, 13 thru 16

Section 9.9 requires the permit specified that the permittee pay annual permit fees and applicable fees as prescribed in District Regulation III Fee Rules.

Compliance with the requirements of this section will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	17

Section 9.13.1 requires any report or document submitted under a permit requirement or a request for information by the District or EPA contain a certification by a responsible official as to truth, accuracy, and completeness.

Compliance with the requirements of this section will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	26

Section 9.13.2 contains inspection and entry requirements that allows an authorized representative of the District to enter a permittee's premises to inspect equipment, operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	18 thru 21

Section 9.16 requires that the permittee submit certification of compliance with the terms and standards of Title V permits to the EPA and the District annually (or more frequently as required by the applicable requirement or the District).

Compliance with the requirements of this section will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	36

Section 10.0 requires any application form, report, or compliance certification submitted pursuant to these regulations shall contain certification of truth, accuracy and completeness by a responsible official.

Compliance with the requirements of this section will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	26

Greenhouse Gas Discussion

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

14) District Rule 4001 – New Source Performance Standards (NSPS)

This rule incorporates the New Source Performance Standards from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR).

See detailed discussions in the following sections:

- 40 CFR Part 60, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978
- 40 CFR Part 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after May 18, 1978, and Prior to July 23, 1984
- 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984
- 40 CFR Part 60, Subpart XX, Standards of Performance for Bulk Gasoline Terminals

15) District Rule 4002 – National Emissions Standards for Hazardous Air Pollutants

This rule incorporates the National Emission Standards for Hazardous Air Pollutants from Part 61, Chapter I, Subchapter C, Title 40, Code of Federal Regulations (CFR) and the National Emission Standards for Hazardous Air Pollutants for Source Categories from Part 63, Chapter I, Subchapter C, Title 40, Code of Federal Regulation (CFR).

See detailed discussions in the following sections:

- 40 CFR Part 63, Subpart R, Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)
- 40 CFR Part 63, Subpart BBBBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

16) District Rule 4101 – Visible Emissions

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.

Compliance with the requirements of this rule will be ensured with the listed permit condition for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	22

17) District Rule 4601 – Architectural Coatings

This rule limits the emissions of VOC's 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.

Compliance with the requirements of this rule will be ensured with the listed permit conditions for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	23 thru 25

The latest version of District Rule 4601 has not been SIP approved. Attachment E contains the streamlining of the SIP approved District Rule 4601 (10/31/01) to the current District Rule 4601 to show the current rule is as stringent if not more stringent than the SIP approved version.

18) District Rule 4623 – Storage of Organic Liquids

The purpose of this rule is to limit volatile organic compound (VOC) emissions from the storage of organic liquids. This rule applies to any tank with a capacity of 1,100 gallons or greater in which any organic liquid is used to placed, held, or stored.

Section 4.4 of this rule states tanks exclusively receiving and/or storing an organic liquid with a TVP less than 0.5 psia are exempt from all other requirements of this rule except for complying provisions pursuant to Section 6.2 - TVP & API gravity testing, Section 6.3 – recordkeeping and Section 6.4 – test methods.

**N-845-23-1**

This is a 4,000 gallons horizontal storage tank and is used to store diesel lubricity additive with a TVP less than 0.5 psia (per Material Safety Data Sheet). Therefore, this tank is only subject to the requirements of Sections 6.2, 6.3, and 6.4 of this rule.

Compliance with the requirements of these sections will be ensured with the listed permit conditions for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-23-1	3

Section 5.1 of this rule requires Group B storage vessels (capacity > 19,800 to 39,600 gallons) storing organic liquids with a TVP of greater than and equal to 11.0 psia to have vapor control installed, and Group C storage vessels (capacity > 39,600 gallons) storing organic liquids with TVP of equal to 1.5 psia but less than 11 psia to be equipped with floating roof or have vapor control installed.

**N-845-1 and N-845-5**

The capacity of these storage tanks is each greater than 39,600 gallons and is used to store organic liquids with TVP less than 11 psia. Each of these tanks is equipped with an internal floating roof.

**N-845-4**

The capacity of this storage tank is greater than 39,600 gallons and is used to store organic liquids with TVP less than 11 psia. This tank is equipped with an external floating roof.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	1
N-845-4-2	1

N-845-10

This is a 20,000 gallons fixed roof storage tank and is used to store transmix with a TVP of 11.11 psia. This tank is currently served by the existing vapor recovery system covered under permit unit N-845-22.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-10-1	2

Section 5.1.3 requires all tanks to be leak-free, as defined by Section 3.17 of the rule.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	15
N-845-4-2	16
N-845-10-1	1

Section 5.2 of this rule requires the pressure-vacuum relief valve be set to within ten percent of the maximum allowable working pressure of the tank.

N-845-1, N845-4, and N-845-5

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	14
N-845-4-2	15

Section 5.3 of this rule provides specifications of external floating roof tanks, which requires the tank be equipped with seals that meet the criteria set forth in section 5.3.2.1 through 5.3.2.3 as applicable.

N-845-4

This external floating roof tank is a welded type tank and is equipped with mechanical shoe-type design primary seal, so this tank is required to meet all the specifications listed in section 5.3.2.1.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-4-2	4 thru 14, and 3

Section 5.4 of this rule provides specification of internal floating roof tanks, which requires the tank be equipped with seals that meet the criteria set forth in section 5.3 except for complying with the requirement specified in section 5.3.2.1.3.

**N-845-1 and N-845-5**

These tanks are welded type tanks and each is equipped with mechanical shoe-type design primary seal, so these tanks are required to meet all the specifications listed in section 5.3.2.1. For internal floating roof, the metallic-shoe type seals shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	3 thru 13, and 2

Section 5.5.1 requires that all openings in the roof used for sampling and gauging, except pressure-vacuum valves complying with Section 5.2, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained organic vapor from escaping from the liquid contents of the tank.

**N-845-1, N-845-4, and N-845-5**

These tanks are equipped with covers and seals. Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	14
N-845-4-2	15

Section 5.5.2.1 requires that internal floating roof deck fittings shall meet all the requirements specified in Section 5.5.2.1.1 through 5.5.2.1.6.

N-845-1 and N-845-5

These are internal floating roof tanks. Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	16 thru 21

Section 5.5.2.2 requires that external floating roof deck fittings shall meet all the requirements specified in Section 5.5.2.2.1 through 5.5.2.2.6.

N-845-4

This is an external floating roof tank. Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-4-2	17 thru 22

Section 5.5.2.3 and 5.5.2.4 specify the solid guidepole and slotted guidepole requirements.

N-845-1 and N-845-5

These internal floating roof storage tanks are not equipped with any solid guidepole or slotted guidepole. Therefore, these tanks are not subject to the requirements of these sections.

N-845-4-2

This external floating roof storage tank is equipped with slotted guidepole. Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-4-2	23 thru 25

Section 5.6.1 requires that fixed roof tanks shall be fully enclosed and shall be maintained in a leak-free condition. An APCO-approved vapor recovery system shall consist of a closed vent system that collects all VOCs from the storage tank and a VOC control device. The vapor recovery system shall be maintained in a leak-free condition. The VOC control device shall be one of the following: (1) A condensation or vapor return system that connects to one



of the following: a gas processing plant, a field gas pipeline, a pipeline distributing Public Utility Commission quality gas for sale, an injection well for disposal of vapors as approved by the California Department of Conservation, Division of Oil Gas, and Geothermal Resources, or (2) A VOC control device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6.

N-845-10

This fixed roof tank is fully enclosed and is currently served by the existing vapor recovery system with a minimum of 95% control efficiency of VOC that covered by permit unit N-845-22.

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-10-1	2

Section 5.6.2 requires that any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling.

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-10-1	3

Section 5.6.3 requires that all piping, valves, and fittings shall be constructed and maintained in a leak-free condition.

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-10-1	4

Section 5.7 specifies the requirements of the Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program.

The facility elected to include storage tanks covered under permit units N-845-1, N-845-4, N-845-5, and N-845-10 into the Voluntary Tank Preventive Inspection & Maintenance, and Tank Interior Cleaning Program on February 15, 2011.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	23 thru 38
N-845-4-2	26 thru 40
N-845-10-1	5 thru 22

Section 6.1.1 and 6.1.3 specify the inspection requirements of external floating roof tanks. Permit unit N-845-4 is external floating roof storage tank, which subject to the requirements of these sections.

Section 6.1.4 specifies the inspection requirements of internal floating roof tanks. Permit units N-845-1 and -5 are internal floating roof storage tanks, which subject to the requirements of this section.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	39, 41, and 44
N-845-4-2	41, 42, and 45

Section 6.2 specifies the TVP and API gravity testing requirements for uncontrolled fixed roof tanks.

**N-845-23**

This permit unit is an uncontrolled fixed roof storage tank. Therefore, Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-23-1	4

Section 6.3 requires the owner or operator shall retain accurate records required by this rule for a period of five years. Records shall be made available to the APCO upon request, except for certain records that need to be submitted as specified in the respective sections 6.3.1 thru 6.3.7.

Permit units N-845-1 and -5 are subject to the requirements of Section 6.3.5.

Permit unit N-845-4 is subject to the requirements of Sections 6.3.5 and 6.3.7.

Permit unit N-845-10 is subject to the requirements of this section.

Permit unit N-845-23 is subject to the requirements of Sections 6.3.1, 6.3.6

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	45, 54, and 55
N-845-4-2	53 thru 55
N-845-10-1	25
N-845-23-1	8, 9, and 11

Section 6.4 specifies the test methods requirements.

Permit units N-845-10 and N-845-23 are subject to the requirements of this section.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-10-1	23
N-845-23-1	5 thru 7

19) District Rule 4624 – Transfer of Organic Liquid

The purpose of this rule is to limit VOC emissions from the transfer of organic liquids. This rule shall apply to organic liquid transfer facilities as defined in this rule.

Section 3.8 classifies an organic liquid transfer facility with daily transfer throughput more than 20,000 gallons of organic liquid as Class 1 organic liquid transfer facility.

This facility has one loading rack with daily transfer throughput limit of 450,000 gallons of organic liquid. Therefore, this facility is considered a Class 1 organic liquid transfer facility, which subject to the requirements of this rule.

Section 5.1 requires emissions of VOC from this transfer operation to not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred and use one of the following systems: (1) bottom loaded organic liquid loading operation, (2) a system that routes emissions from the transfer operation to: (a) a vapor collection and control system, (b) a fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids),

(c) a floating roof container that meets the control requirements specified in District Rule 4623, (d) a pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements of Rule 4623, or (e) a closed VOC emission control system.

N-845-6

This permit unit is a bottom loaded loading rack and is currently served by the existing vapor collection and control system covered under permit unit N-845-22.

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-6-2	2

Section 5.4 states that the vapor collection and control system must 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.

N-845-6 and N-845-22

Permit unit N-845-22 is a vapor recovery system, which is also subject to the requirements of this section.

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-6-2	6
N-845-22-2	2

Section 5.5 states that all delivery tanks which previously contained organic liquids with a TVP of 1.5 psia or greater at the storage container's maximum organic liquid storage temperature shall be filled only at transfer facilities satisfying Sections 5.1, 5.2, or 5.4, as applicable.

N-845-6 and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-6-2	7
N-845-22-2	3

Section 5.6 states that the transfer rack and vapor collection equipment must be designed, installed, maintained, and operated such that there are no leaks and no excess organic liquid drainage at disconnections.

N-845-6 and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-6-2	8
N-845-22-2	4

Section 5.9.1 requires the operator of an organic liquid transfer facility must inspect the vapor collection system, the vapor disposal system, and each transfer rack handling organic liquids for leaks during transfer at least once every calendar quarter using the test method prescribed in Section 6.3.8.

N-845-6 and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-6-2	9
N-845-22-2	5

Section 5.9.3 requires all equipment that is found leaking must be repaired or replaced within 72 hours. If the leaking component cannot be repaired or replaced within 72 hours, the component must be taken out of service until it is repaired or replaced. The repaired or replaced equipment must be re-inspected the first time the equipment is on operation after performing the repair or replacement.

N-845-6 and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-6-2	10
N-845-22-2	6

Section 5.9.4 states that the operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during five consecutive quarterly inspections. Upon the identification of any leak during an annual inspection, the frequency will return to quarterly inspections and the operator must contact the APCO in writing within 14 days.

N-845-6 and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-6-2	11
N-845-22-2	7

Section 6.1.3 requires the operator subject to any part of Section 5.0 must keep records of the daily liquid throughput and the results of any leak inspections.

N-845-6 and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-6-2	18 and 21
N-845-22-2	19 and 23

Section 6.1.4 states that records shall be retained for a minimum of five years and shall be made readily available to the APCO, ARB, or EPA during normal business hours and submitted upon request to the APCO, ARB, or EPA.

N-845-6 and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-6-2	22
N-845-22-2	24

Section 6.2.1 requires that this facility to perform an initial source test of the VOC emission control system in accordance with the method prescribed in Section 6.3.2, and Section 6.2.2 requires the operator to perform source test specified in Section 6.3.2 once every 60 months, but no more than 30 days before or after initial source test anniversary date.

N-845-22

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-22-2	12

Section 6.3.2 states that demonstrate compliance with the VOC emission limit shall be determined using 40 CFR 60.503 "Test Methods and Procedures" and EPA Methods 2A, 2B, 25A and 25B and ABR method 422, or ARB Test Procedure TP-203.1.

N-845-22

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-22-2	15

In addition, two ATCs N-845-6-3 and N-845-22-3 have been issued to the facility on March 26, 2012 under project N-1112963. These ATCs authorize the facility to install additional loading arm assemblies and increase the gasoline loading throughputs to the loading rack, and the replacement of the existing VRS with VOC control efficiency of 95% to a new VRS with VOC control efficiency of 99% respectively.

These ATC N-845-6-3 and N-845-22-3 have not been implemented at the time of this evaluation was conducted.

20) District Rules 8011, 8021, 8031, 8041, 8051, 8061, and 8071 – SJVUAPCD Regulation VIII – Fugitive Dust (PM10)

These regulations contain requirements for the control of fugitive dust. These requirements apply to various sources, including construction, demolition, excavation, extraction, mining activities, outdoor storage piles, paved and unpaved roads.

Compliance with the requirements of these rules will be ensured with the listed permit conditions for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	29 thru 34

21) 40 CFR Part 60, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and Prior to May 19, 1978

This subpart applies to storage vessel:

- a) has a capacity greater than 151,416 liters (equivalent to 40,000 gallons), but not exceeding 246,052 liters (equivalent to 65,000 gallons), and commences construction or modification after March 8, 1974, and prior to May 19, 1978, and
- b) has a capacity greater than 246,052 liters (equivalent to 65,000 gallons) and commences construction or modification after June 11, 1973, and prior to May 19, 1978.

The following table summarizes the permit unit number, type of petroleum liquids (PL) stored, tank capacity, equipment construction, reconstruction, or modification date, and the exemption status.

Permit Units	PL stored	Tank Capacity (gallon)	Modification Date After 3/8/74 & prior to 5/19/78?	Modification Date After 6/11/73 & prior to 5/19/78?	Exempt?
N-845-1	Gasoline	420,000	N/A	No	Yes
N-845-4	Gasoline	714,000	N/A	No	Yes
N-845-5	Gasoline	840,000	N/A	No	Yes
N-845-10	Transmix	20,000	N/A	N/A	Yes
N-845-23	Diesel Lubricity Additive	4,000	N/A	N/A	Yes



As shown in the above table, all these storage tanks are exempt from the requirements of this subpart. Detailed discussions are follows:

N-845-1 and N-845-5

These gasoline storage tanks had not been modified after June 11, 1973 and prior to May 19, 1978. Therefore, these storage tanks are exempt from the requirements of this subpart.

N-845-4

This gasoline storage tank had not been modified after June 11, 1973 and prior to May 19, 1978. Therefore, this storage tank is exempt from the requirements of this subpart.

N-845-10 and N-845-23

The capacities of these storage tanks are each less than 40,000 gallons, which are exempt from the requirements of this subpart.

22) 40 CFR Part 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after May 18, 1978, and Prior to July 23, 1984

This subpart applies to storage vessels with a capacity of greater than 151,416 liters (equivalent to 40,000 gallons) that is used to store petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984.

This subpart does not apply to petroleum liquid storage vessel with a capacity of less than 420,000 gallons used for petroleum or condensate stored, processed, or treated prior to custody transfer.

The following table summarizes the permit unit number, type of petroleum liquids (PL) stored, tank capacity, equipment construction, reconstruction, or modification date, and the exemption status.

Permit Units	PL stored	Tank Capacity (gallon)	Capacity < 420,000 gallon?	Date After 5/18/78 & Prior to 7/23/84?	Exempt?
N-845-1	Gasoline	420,000	No	No	Yes
N-845-4	Gasoline	714,000	No	No	Yes
N-845-5	Gasoline	840,000	No	No	Yes
N-845-10	Transmix	20,000	Yes	N/A	Yes
N-845-23	Diesel Lubricity Additive	4,000	Yes	N/A	Yes

As shown in the above table, all these storage tanks are exempt from the requirements of this subpart. Detailed discussions are follows:

N-845-1 and N-845-5

These gasoline storage tanks had not been modified after May 18, 1978 and prior to July 23, 1984. Therefore, these storage tanks are exempt from the requirements of this subpart.

N-845-4

This gasoline storage tank was installed in the 1960s, and was modified in 1998 to replace the primary and secondary seals with a new set of primary and secondary seals for District Rule 4623 compliance.

40 CFR Part 60, Subpart A §60.2 define *Modification* as, any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

The modification to this storage tank conducted in 1998 was solely for District Rule 4623 compliance and result no increase of emissions of any air pollutant, which action does not meet the definition of modification under the federal requirements. Therefore, this tank is exempt from the requirements of this subpart.

N-845-10 and N-845-23

The capacity of these tanks is each less than 40,000 gallons, which are exempt from the requirements of this subpart.

- 23) 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984

This subpart applies to any storage vessels with a capacity greater than or equal to 75 m<sup>3</sup> (equivalent to 19,813 gallons) to that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984, unless the storage vessel is subjected to the exemption of this subpart.

This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m<sup>3</sup> (equivalent to 39,890 gallons) storing a liquid with a maximum true vapor pressure (TVP) less than 3.5 kilopascals (kPa).

The following table summarizes the permit unit number, type of VOL stored in the vessel, tank capacity, equipment construction, reconstruction, or modification date, maximum TVP, and the exemption status.

Permit Units	VOL stored	Tank Capacity ≥ 75 m <sup>3</sup> ?	Modification Date after 7/23/84?	Tank Capacity ≥ 151 m <sup>3</sup> & Max TVP < 3.5 kPa?	Exempt?
N-845-1	Gasoline	Yes	Yes	No	No
N-845-4	Gasoline	Yes	No	N/A	Yes
N-845-5	Gasoline	Yes	Yes	No	No
N-845-10	Transmix	Yes	No	N/A	Yes
N-845-23	Diesel Lubricity Additive	No	No	N/A	Yes

As shown in the above table, only storage tanks covered under permit units N-845-1 and N-845-5 are subject to the requirements of this subpart, and storage tanks covered under permit units N-845-4, N-845-10, and N-845-23 are exempt from the requirement of this subpart. Detailed discussions are follows:

**N-845-1 and N-845-5**

The capacity of these storage tanks is each greater than 75 cubic meters, and these tanks were previously determined to subject to the requirements of this subpart.

**N-845-4**

As discussed in the previous section, the replacement of the primary & secondary seals conducted in 1998 was not considered modification under the federal requirements. Therefore, this tank is exempt from the requirements of this subpart.

**N-845-10**

This transmix storage tanks was installed prior to July 23, 1984 and has not been reconstructed or modified after July 23, 1984.

An ATC N-845-10-2 has been issued to the facility on March 26, 2012 under project N-1112963, which authorizes the facility to reroute the vapors path of this tank from the existing vapor recovery system (VRS) covered under PTO

N-845-22 with VOC control efficiency of 95% to a new VRS with VOC control efficiency of 99% under the same permit unit.

ATC N-845-10-2 has not been implemented at the time of this evaluation was conducted. In addition, the proposed modification to this storage tank result no increase of emissions of any air pollutant, which action does not meet the definition of modification under the federal requirements. Therefore, this tank is exempt from the requirements of this subpart.

N-845-23

The capacity of this storage tank is less than 75 cubic meter and is used to store diesel lubricity additive with true vapor pressure less than 3.5 kilopascals (kPa). Therefore, this tank is exempt from the requirements of this subpart.

**§60.112b Standard for Volatile Organic Compounds (VOC)**

N-845-1 and N-845-5

This section requires that the storage tank shall meet the requirement under §60.112b(a)(1) for a fixed roof tank in combination with an internal floating roof.

§60.112b(a)(1)(i) requires that the internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.

§60.112b(a)(1)(ii) requires that the internal floating roof shall be equipped with one of the closure devices provided in §60.112b(a)(1)(ii)(A), §60.112b(a)(1)(ii)(B), or §60.112b(a)(1)(ii)(C).

§60.112b(a)(1)(iii) requires that each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.

§60.112b(a)(1)(iv) requires that each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains shall be equipped with a cover, or a lid shall be maintained in a closed position at all times (i.e. no visible gaps) except when the device is in use. The cover or lid shall be

equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted in place except when they are in use.

§60.112b(a)(1)(v) requires that automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the leg roof supports.

§60.112b(a)(1)(vi) requires that rim vents shall be equipped with a gasket and shall be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.

§60.112b(a)(1)(vii) requires that each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90 percent of the opening.

§60.112b(a)(1)(viii) requires that each penetration of the internal floating roof that allows for the passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover.

§60.112b(a)(1)(ix) requires that each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.

Compliance with the requirements of §60.112b(a) will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	2, 16 thru 22

### **§60.113b Testing and procedures**

#### **N-845-1 and N-845-5**

This section requires the owner or operator of each storage vessel equipped with permanently affixed roof and internal floating roof to meet the visually inspection requirements of §60.113b(a).

§60.113b(a)(1) requires that the owner or operator shall visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with volatile organic liquid. If there are holes, tears or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.

§60.113b(a)(2) requires that the owner or operator shall visually inspect the internal floating roof and the primary seal, or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the volatile organic liquid inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in §60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

§60.113b(a)(4) requires that the owner or operator shall visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and/or sleeve seals each time the storage vessel is emptied and degassed.

§60.113b(a)(5) requires that the owner or operator to notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §60.113b(a)(1) of this section to afford the Administrator the opportunity to have an observer present.

Compliance with the requirements of §60.113b will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	39 thru 43

**§60.115b: Reporting and recordkeeping requirements**

**N-845-1 and N-845-5**

This section requires the owner or operator of each storage vessel equipped with permanently affixed roof and internal floating roof shall keep records and furnish reports as required by §60.112b(a). The owner or operator shall keep copies of all reports and records required by this section, except for the record required by (c)(1), for at least two years. The records required by (c)(1) will be kept for the life of the control equipment.

Compliance with the requirements of §60.115b will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	45

**§60.116b: Monitoring of operations**

**N-845-1 and N-845-5**

This section specifies the record keeping requirements.

§60.116b(a) requires the owner or operator to keep copies of all records for at least two years.

§60.116b(b) requires the owner or operator to keep records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel, and these records shall be kept for the life of the source.

§60.116b(c) requires the owner or operator to maintain records of the volatile organic liquid stored, the period of storage, and the maximum true vapor pressure of that volatile organic liquid during the respective storage period.

Compliance with the requirements of §60.116b will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	55, 52, and 53

24) 40 CFR Part 60, Subpart XX, **Standards of Performance for Bulk Gasoline Terminals**

This subpart applies to all of the loading racks at a bulk gasoline terminal which deliver liquid product into gasoline tank trucks and that commenced construction or modification after December 17, 1980.

This bulk gasoline terminal has only one loading rack which deliver liquid product into organic liquid (including gasoline) tank trucks.

This existing loading rack was constructed in 1974. Tesoro submitted an Authority to Construct application to increase the daily throughput limit of the loading rack from 250,000 gallons to 450,000 gallons under project N-1001299 on December 10, 2000. The ATC N-845-6-1 for the proposed modification was implemented on October 1, 2001, and this modification resulted increase of VOC emissions.

However, pursuant to 40 CFR 60.14(e)(2), an increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure on that facility, this action shall not be considered modification under this subpart.

During the public notice commenting period, the applicant testified that the increase of the daily throughput limit of the loading rack conducted in 2001 was done without a capital expenditure to the facility. Therefore, the permitting action conducted in 2001 was not considered a modification under this subpart.

In conclusion, this existing loading rack is not currently subject to the requirements of this subpart.

25) 40 CFR Part 63, Subpart R, Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations).

This terminal is not subject to the requirement of this subpart, since this terminal is not a major source for Hazardous Air Pollutants (HAP) as determined below:

§63.2 of Subpart A defines "major HAP source" as any stationary source or group of stationary sources that emits or has the potential to emit 10 tons per year or more of any HAP, or 25 tons per year or more of any combination of HAPs.

Per EPA's document, Gasoline Distribution Industry (Stage 1) – Background Information for Proposed Standards, EPA-453/R-94-002a, Table 3.1, Vapor Profile of Normal Gasoline, the total HAPs to VOC ratio is 11% by weight.

Per project N-1112963, the total VOC emission from this facility is calculated to 22,751 pounds per year. The total HAPs from this facility is then calculated to:

$$\begin{aligned} \text{Total HAPs} &= 22,751 \text{ lb-VOC/yr} \times 0.11 \text{ lb-HAPs/lb-VOC} \\ &= 2,503 \text{ lb-HAPs/yr (equivalent to 1.25 tons/yr)} \end{aligned}$$

The total HAPs emissions, 1.25 tons per year from this facility is less than 25 tons per year threshold for combined HAPs. Since the combined HAPs emissions is less than 10 tons per year, the individual HAP emissions must be less than 10 tons per year. This terminal is not a major source of HAPs. Therefore, this facility is not subject to the requirements of this subpart.



26) 40 CFR Part 63, Subpart BBBBBB, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

**§63.11081 Applicability of this subpart**

§63.11081(a) states that the affected source to which this subpart applies is each area source bulk gasoline terminal, pipeline breakout station, pipeline pumping station, and bulk gasoline plant.

§63.11100 defines that a bulk gasoline terminal means any gasoline storage and distribution facility that receives gasoline by pipeline, ship or barge, or cargo tank and has a gasoline throughput of 20,000 gallons per day or greater.

The current daily gasoline throughput limit of this facility is 450,000 gallons. Therefore, this facility is subject to the requirements of this subpart.

**§63.11082 Affected source covered by this subpart**

N-845-1, N-845-4, N-845-5, N-845-6, and N-845-22

§63.11082(a) states the emission sources to which this subpart applies are gasoline storage tanks, gasoline loading racks, vapor collection-equipped gasoline cargo tanks, and equipment components in vapor or liquid gasoline service that meet the criteria specified in Table 1 through 3 to this subpart.

This facility has the emissions units listed above. Therefore, the emission units, except permit units N-845-10 and N-845-23, are required to comply with the requirements of this subpart.

**N-845-10**

This existing 20,000 gallon vertical fixed roof storage tank is used to store transmix with a TVP of 11.11 psia and is not used to store gasoline as defined in §63.11100 of this subpart. Therefore, this storage tank is not subject to the requirements of this subpart.

**N-845-23**

This existing 4,000 gallons horizontal storage tank is used to store diesel lubricity additive with a TVP less than 0.5 psia and is not used to store gasoline as defined in in §63.11100 of this subpart. Therefore, this storage tank is not subject to the requirements of this subpart.

**§63.11083 Compliance Date of this subpart**

§63.11083(c) states that if an existing affected source that becomes subject to the control requirements in this subpart because of an increase in the daily throughput, as specified in option 1 of Table 2 to this subpart, the owner or operator must comply with the standards in this subpart no later than 3 years after the affected source becomes subject to the control requirements in this subpart.

According to the additional gasoline throughput records 2007 through 2011 provided by the applicant during the public notice commenting period, the daily average gasoline throughput of the loading rack is greater than 250,000 gallons since August 2010.

The following table summarizes the provided annual gasoline throughput records, the daily average throughput, and the applicability of NESHAP Subpart 6B Table 2, option 1.

Year	Provided Annual Gasoline Throughput (gal/year)	Day/year	Daily Average Throughput (gal/day)	> 250,000 (gal/day)	Applicability of NESHAP Subpart 6B Table 2.1
2007	79,817,389	365	218,678	No	No
2008	72,774,121	365	199,381	No	No
2009	75,518,358	365	206,900	No	No
2010	100,818,487	365	276,215	Yes	Yes
2011	110,841,167	365	303,674	Yes	Yes

Therefore, the existing loading rack is currently subject to the requirements specified in option 2 of Table 2 of this subpart, and the loading rack shall meet the control requirements specified in option 1 of Table 2 to this subpart by August 1, 2013.

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-6-2	3

**§63.11087 Gasoline Storage Tanks Requirements for bulk gasoline terminal**

§63.11087(a) requires each gasoline storage tank to meet the emissions limit and management practices in Table 1 to this subpart.

**N-845-1 and N-845-5**

The capacity of each of the internal floating roof gasoline storage tanks under these permit units is each greater than 75 cubic meters.

**N-845-4**

The capacity of this external floating roof gasoline storage tank is greater than 75 cubic meters.

Therefore, these gasoline storage tanks must meet the requirements listed under §63.11100, Table 1, item 2, as follows:

- i. Reduce emissions of total organic HAP or TOC by 95% (by weight) with a closed vent system and control device; or
- ii. equip each internal floating roof gasoline tank according to the requirements in 40 CFR Part 60 Subpart Kb, specifically, §60.112b(a)(1) except for the secondary seal requirement under §60.112b(a)(1)(ii)(B) and the requirements in §60.112b(a)(1)(iv) through (ix); and
- iii. equip each external roof gasoline storage tank according to the requirements in §60.112b(a)(2), except that the requirements of §60.112b(a)(2)(ii) shall only be required if such storage tank does not currently meet the requirements of §60.112b(a)(2)(i); or
- iv. equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in §63.1063(a)(1) and (b), and equip each external floating roof gasoline storage tank according to the requirements of §63.1063(a)(2) if such storage tank does not currently meet the requirements of §63.1063(a)(1).

**N-845-1 and N-845-5**

These internal floating roof storage tanks are each equipped with a mechanical shoe primary seal and a secondary wiper seal that meet the requirements according to §60.112(b)(a)(1).

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	2, 16 thru 22

N-845-4

This external floating roof storage tank is equipped with a mechanical shoe primary seal and a secondary wiper seal that meet the requirements according to §60.112(b)(a)(2).

§60.112b(a)(2)(i) requires that each external floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is required to be the primary seal, and the upper seal is referred to as the secondary seal. The primary seal (lower seal) shall completely cover the annular space between the edge of the floating roof and tank wall. The secondary seal (upper seal) shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion.

§60.112b(a)(2)(ii) requires that except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface. Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is to be equipped with a gasketed cover, seal, or lid that is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. Rim vents are to be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents are to be gasketed. Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening.

§60.112b(a)(2)(iii) requires that the roof shall be floating on the liquid at all time (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and then when the tank is completely emptied and subsequently refilled. The process of filling or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.

Compliance with the requirements of this section will be ensured with the listed permit condition for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-4-2	2, 3, 17 thru 21

§63.11087(c) requires the owner or operator to perform testing and monitoring specified in §63.11092(e).

§63.11092(e) requires the owner or operator to perform inspections of internal floating roof gasoline storage tank per §60.113b(a).

N-845-1 and N-845-5

As discussed in previous section, these internal floating roof gasoline storage tanks will comply with the requirements of §60.113b(a).

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	39 thru 44

§63.11092(e) requires the owner or operator to perform inspections of external floating roof gasoline storage tank per §60.113b(b).

N-845-4

§60.113b(b)(1) requires that the owner or operator shall measure (i) the gaps areas and maximum gap widths between the tank wall and the primary seal within 60 days of the initial fill with VOL and at least once every 5 years thereafter, (ii) the gaps areas and maximum gap widths between the tank wall and the secondary seal within 60 days of the initial fill with VOL and at least once per year thereafter.

§60.113b(b)(2) and (3) requires that the owner or operator shall determine gap widths and areas in the primary and secondary seals individually following procedures specified in these sections.

§60.113b(b)(4) requires that the owner or operator shall make necessary repair and changes if the gap widths and areas do not comply with the requirements in this section.

§60.113b(b)(5) requires that the owner or operator shall notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §60.113b(b)(1) of this section to afford the Administrator the opportunity to have an observer present.

§60.113b(b)(6) requires that the owner or operator shall visually inspect the external floating roof, the primary seal, the secondary seal, and fittings

each time the storage vessel is emptied and degassed. This section also requires that the owner or operator to notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by §60.113b(b)(6) of this section to afford the Administrator the opportunity to have an observer present.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-4-2	42 thru 46

§63.11087(d) requires the owner or operator to submit the applicable notifications as required under §63.11093.

§63.11093(a) requires the owner or operator to submit an Initial Notification as specified in §63.9(b). If the facility is in compliance with the requirements of this subpart at the time the Initial Notification is due, the Notification of Compliance Status required under paragraph (b) of this section may be submitted in lieu of the Initial Notification.

The facility submitted the Initial Notification to the Administrator and District on May 09, 2008. Therefore, compliance with the requirements of this section is expected.

§63.11093(b) requires the owner or operator of an affected source under this subpart must submit a Notification of Compliance Status as specified in §63.9(b). The Notification of Compliance Status must specify which of the compliance options included in Table 1 of this subpart is used to comply with this subpart.

The facility submitted the Notification of Compliance Status to the Administrator and District on January 7, 2011. Therefore, compliance with the requirements of this section is expected.

§63.11087(e) requires the owner or operator to keep records and submit reports as specified in §63.11094 and §63.11095.

§63.11094 and §63.11095 require to keep records and submit reports per §60.115b(a) for internal floating roof tanks and §60.115b(b) for external floating roof tanks.

N-845-1 and N-845-5

As discussed in previous section, these internal floating roof storage tanks will comply with the requirements of 40 CFR Part 60 Subpart Kb.

Compliance with the requirements of §60.115b(a) will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	45

N-845-4

§60.115b(b)(1) requires the owner or operator to furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(2) and §60.113b(b)(2), (b)(3), and (b)(4).

§60.115b(b)(2) requires the owner or operator to furnish the seal gap measurement report within 60 days after performing the gap measurements. The report shall contain the following: i) the date of measurement, ii) the raw data obtained in the measurement, and iii) the calculations described in §60.113(b)(2) and (b)(3).

This existing external floating roof tank is currently equipped with both primary and secondary seals that meet the specifications listed above. Therefore, no additional reports are required.

§60.115b(b)(3) requires the owner or operator to keep records of each gap measurement.

§60.115b(b)(4) requires the owner or operator to submit a report within 30 days after the inspection for the tank that detects gap exceeding the limitation specified in §60.113(b)(4).

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-4-2	53

**§63.11088 Gasoline Loading Rack Requirements**

§63.11088(a) requires each loading rack to meet the emissions limit and management practices in Table 2 to this subpart.

**N-845-6**

This is a bulk gasoline terminal loading rack with daily organic liquids throughput of 450,000 gallons.

As discussed in §63.11083(c) above, the unit must meet the requirements listed in §63.11088(a), Table 2, item 2 as follows:

- a. use submerged filling with a submerged fill pipe that is no more than 6 inches from the bottom of the cargo tank; and
- b. make records available within 24 hours of a request by the Administrator to document your gasoline throughput.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permit in the table below:

Permit Number	Permit Condition Number
N-845-6-2	4

**§63.11089 Equipment Leak Inspections Requirements**

§63.11089(a) requires the owner or operator to perform a monthly leak inspection of all equipment in gasoline service. For this inspection, detection methods incorporating sight, sound, and smell are acceptable.

**N-845-1, N-845-4, N-845-5, N-845-6, N-845-22**

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	46
N-845-4-2	47
N-845-6-2	12
N-845-22-2	8

§63.11089(b) requires that a log book must be used and must be signed by the owner or operator at the completion of each inspection. A section of the log book must contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility.



N-845-1, N-845-4, N-845-5, N-845-6, and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	47
N-845-4-2	48
N-845-6-2	13
N-845-22-2	9

§63.11089(c) requires that each detection of a liquid or vapor leak must be recorded in the log book. When a leak is detected, an initial attempt at repair must be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment must be completed within 15 days after detection of the leak, except as provided in §63.11089(d).

§63.11089(d) states that delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator must submit a semiannual report that includes the reason(s) why the repair was not feasible and the date each repair was completed.

N-845-1, N-845-4, N-845-5, N-845-6, and N-845-22

Compliance with the requirements of these sections will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	48
N-845-4-2	49
N-845-6-2	14
N-845-22-2	10

§63.11089(e) requires the owner or operator must comply with the requirements of this subpart by the applicable dates specified in §63.11083.

§63.11089(f) requires the owner or operator must submit the applicable notifications as required under §63.11093.

As discussed in §63.11083(c) and §63.11093, the facility is currently comply with the requirements of these sections.

§63.11089(g) requires the owner or operator must keep records and submit reports as specified in §63.11094 and §63.11095.

N-845-1, N-845-4, N-845-5, N-845-6, and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	50
N-845-4-2	51
N-845-6-2	18
N-845-22-2	19

**§63.11092 Testing and Monitoring Requirements**

§63.11092(a) states that the owner or operator of a bulk gasoline terminal subject to the emission standard in item 1(b) of Table 2 of this subpart must comply with the requirements in paragraphs (a) through (d) of this section.

As discussed in §63.11088(a) above, the terminal is not currently subject to the requirement of 1(b) of Table 2 of this subpart. Therefore, testing and monitoring requirements under this section are not currently applicable to this bulk gasoline terminal.

§63.11092(e)(1) requires the owner or operator who operates an internal floating roof gasoline storage tank must perform inspections according to the requirement of §60.113b(a).

N-845-1 and N-845-5

As discussed in previous section, these internal floating roof gasoline storage tanks will comply with the requirements of §60.113b(a).

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	39 thru 43

§63.11092(e)(2) requires the owner or operator who operates an external floating roof gasoline storage tank must perform inspections according to the requirement of §60.113b(b).

N-845-4

As discussed in previous section, these internal floating roof gasoline storage tanks will comply with the requirements of §60.113b(b).

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-4-2	42 thru 46

**§63.11093 Notifications, Records, and Reports**

As discussed in previous section, the facility submitted the Notification of Compliance Status to the Administrator and District on January 7, 2011. Therefore, compliance with the requirements of this section is expected.

**§63.11094 Recordkeeping Requirements**

§63.11094(a) requires that all records must be kept for at least five year.

**N-845-1, N-845-4, N-845-5, N-845-6, and N-845-22**

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	55
N-845-4-2	55
N-845-6-2	22
N-845-22-2	24

§63.11094(b) lists recordkeeping requirements for vapor tightness of trucks.

**N-845-6 and N-845-22**

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-6-2	17
N-845-22-2	18

§63.11094(d) requires owners or operators that are subject to leak provisions, to keep a record describing the types, identification numbers, and locations of all equipment in gasoline service.

N-845-1, N-845-4, N-845-5, N-845-6, and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	47
N-845-4-2	48
N-845-6-2	13
N-845-22-2	9

§63.11094(e) requires the owner or operator to keep records of equipment leak inspections.

N-845-1, N-845-4, N-845-5, N-845-6, and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	50
N-845-4-2	51
N-845-6-2	18
N-845-22-2	19

**§63.11095 Reporting Requirements**

§63.11095(a)(1) requires the owner or operator to submit a semi-annual compliance report that includes information specified in §60.115(b)(a) for internal floating roof storage tank and §60.115(b)(b) for external floating roof storage tank.

N-845-1, N-845-4, and N845-5

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	49
N-845-4-2	50

§63.11095(a)(2) requires that the owner or operator shall report each loading of a gasoline cargo tank for which vapor tightness document had not been previously obtained by the facility.

N-845-6 and N845-22

This facility uses an automated system which only allows loading of gasoline cargo tanks for which vapor tightness documentation had previously been obtained.

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-6-2	20
N-845-22-2	21

§63.11095(a)(3) requires that the owner or operator shall report the number of equipment leaks not repaired within 15 days after detection.

N-845-1, N-845-4, N-845-5, N-845-6, and N-845-22

Compliance with the requirements of this section will be ensured with the listed permit conditions for the associated permits in the table below:

Permit Number	Permit Condition Number
N-845-1-3 & -5-3	48
N-845-4-2	49
N-845-6-2	14
N-845-22-2	10

§63.11095(a)(4) states the storage vessels complying with §63.11087(b) after January 10, 2011, the storage vessel's Notification of Compliance Status information can be included in the next semi-annual compliance report in lieu of filing a separate Notification of Compliance Status report under §63.11093.

§63.11095(b) states the owner or operator of an affected source subject to the control requirements of this subpart shall submit an excess emissions report to the Administrator at the time the semi-annual compliance report is submitted.

§63.11095(d) states the owner or operator of an affected source under this subpart shall submit a semi-annual report including the number, duration, and a brief description of each type of malfunction which occurred during the

reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.11085(a), including actions taken to correct a malfunction.

The facility submitted the most recent semi-annual compliance report to the Administrator and District on January 30, 2012, which included discussion of all requirements under these sections. Therefore, continuous compliance with the requirements of these sections is expected.

27) 40 CFR Part 64, Subpart C, Compliance Assurance Monitoring (CAM)

To be subject to CAM for a particular pollutant, an emissions unit must meet all of the following criteria:

- 1) The unit must have an emission limit for the pollutant.
- 2) The unit must have add-on controls for the pollutant. Catalytic oxidizers, dust collector, and flue gas recirculation (FGR) are examples of add-on controls.
- 3) The unit must have a pre-control potential to emit of greater than the major source thresholds.

N-845-1, N-845-4, and N-845-5 (Floating Roof Storage Tanks)

These permits do not contain emission limits for VOC (the only pollutant which would be emitted from the unit), and these units are not equipped with any add-on control devices. Therefore, these units are not subject to CAM requirements.

N-845-6 (Loading Rack)

This permit unit does not contain emission limits for VOC (the only pollutant which would be emitted from this unit), but has a daily transfer throughput limit of 450,000 gallons.

However, this permit unit is served by an add-on control system, a carbon adsorption/absorption vapor recovery system covered under permit unit N-845-22. Permit unit N-845-22 has a VOC emissions limit of 0.08 pounds of VOC emissions per 1,000 gallons of gasoline transferred.

Therefore, this unit may be subject to CAM requirements if the pre-control potential to emit of this permit unit is greater than the major source threshold of 20,000 pounds VOC per year (equivalent to 10 tons per year).

The pre-control potential to emit for this unit will be calculated based on the daily throughput limit, the VOC emissions EF of the vapor recovery system, the control efficiency of the vapor recovery system, and the worst-case operating schedule of 365 days per year as follow:

$$\begin{aligned} PE_{\text{Uncontrolled}} &= [450,000 \text{ gal/day} \times 365 \text{ day/yr} \times 0.08 \text{ lb-VOC/1,000 gal}] \div (1-0.95) \\ &= 262,800 \text{ lb-VOC/yr} \\ &= 131.4 \text{ ton-VOC/yr} \end{aligned}$$

The uncontrolled VOC emissions from this permit unit is calculated to 131.4 tons per year, which is greater than the major source threshold of 10 tons per year for VOC. Therefore, CAM requirement is required for this permit unit.

Pursuant to 40 CFR 64.5(a), facilities with "Large pollutant-specific emissions units" are required to submit a CAM Plan as part of the initial Title V permit application. A "Large pollutant-specific emissions unit" is one that the post-control potential to emit greater than the major source threshold.

Pursuant to 40 CFR 64.5(b), facilities with other pollutant-specific emissions units shall submit a CAM Plan as part of the Title V permit renewal application.

Therefore, this facility may be required to submit a CAM Plan during the Initial Title V permit application if the emission unit is considered a Large pollutant-specific emission unit, where the post-control potential to emit is greater than 20,000 pounds of VOC per year (equivalent to 10 tons per year).

The controlled potential to emit for this unit will be calculated based on the daily throughput limit, the VOC emission EF of the vapor recovery system, and the worst-case operating schedule of 365 days per year as follow:

$$\begin{aligned} PE_{\text{Controlled}} &= [450,000 \text{ gal/day} \times 365 \text{ day/year} \times 0.08 \text{ lb-VOC/1,000 gal}] \\ &= 13,140 \text{ lb-VOC/year} \\ &= 6.57 \text{ ton-VOC/year} \end{aligned}$$

The controlled VOC emissions from this permit unit is calculated to 6.57 tons per year, which is less than the major source threshold of 10 tons per year for VOC. Therefore, the facility is required to submit a CAM Plan at the time of the Title V permit renewal, but not in this Initial Title V permit application.

#### N-845-10 (Controlled Fixed Roof Storage Tank)

This permit unit does not contain emission limits for VOC (the only pollutant which would be emitted from this unit). Therefore, this unit is not subject to CAM requirements.

N-845-22 (Vapor Recovery Control System)

The vapor recovery system is not an emissions unit. Therefore, this unit is not subject to CAM requirements.

N-845-23 (Uncontrolled Fixed Roof Storage Tank)

This permit unit has an emission limit but is not equipped with any add-on control device. Therefore, this unit is not subject to CAM requirements.

28) 40 CFR Part 82, Subparts B and F, Protection of Stratospheric Ozone, Servicing of Motor Vehicle Air Conditioners and Recycling and Emission Reduction

These are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC).

Compliance with the requirements of this rule will be ensured with the listed permit conditions for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	27 and 28

**X. 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 Addresses by Model General Permit Templates.**

Upon this initial Title V engineering evaluation was completed, the applicant has not decided the use of Facility-Wide Umbrella Template SJV-UM-03. However, during the public notice period, the applicant requests to obtain permit shield.

The permit conditions #1 through #38 listed on the draft Initial Title V Operating Permit N-845-0-1 are identical to the conditions #1 through #38 listed on the Umbrella Template SJV-UM-03. Detailed discussions are follows:



District Rule 1100, 6.1 and 7.0

Compliance with these requirements was addressed in Section IX of this document, and is assured by conditions #1 and #2.

District Rule 2010, 3.0 and 4.0

Compliance with these requirements was addressed in Section IX of this document, and is assured by condition #4.

District Rule 2031; 2070, and 2080

Compliance with these requirements was addressed in Section IX of this document, and is assured by conditions #5 and #6.

District Rule 2040

Compliance with these requirements was addressed in Section IX of this document, and is assured by condition #7.

District Rule 4101

Compliance with these requirements was addressed in Section IX of this document, and is assured by condition #22.

District Rule 4601

Compliance with these requirements was addressed in Section IX of this document, and is assured by conditions #23, #24 and #25.

District Rule 8021, 8031, 8041, 8051, 8061, and 8071

Compliance with these requirements was addressed in Section IX of this document, and is assured by conditions #29 - #34.

County APCD Rules

Current District rules assure compliance with comparable county rules that are part of the SIP.

Therefore, a permit shield is being granted for these requirements, and the following conditions will be added to the initial TV Operating Permit N-845-0-1.

- 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]

- 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]

## **XI. PERMIT CONDITIONS**

See Attachment A - Initial Title V Operating Permit

## **XII. ATTACHMENTS**

- A. Initial Title V Operating Permit
- B. Detailed Facility List
- C. Exempt Equipment
- D. Existing District Permit
- E. Stringency Comparison for District Rule 4601
- F. Public comments and District responses
  - i) Comments received on September 10, 2012
  - ii) Comments received on October 6, 2012
  - iii) Comments received on October 9, 2012

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# ATTACHMENT A

Initial Title V Operating Permit

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**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

  
**HEALTHY AIR LIVING™**

# Permit to Operate

**FACILITY:** N-845

**EXPIRATION DATE:** 07/31/2017

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

TESORO LOGISTICS OPERATIONS LLC  
ATTN: BROOKS NEIGHBORS  
19100 RIDGEWAY PARKWAY  
SAN ANTONIO, TX 78259

**FACILITY LOCATION:**

3003 NAVY DR  
STOCKTON, CA 95206

**FACILITY DESCRIPTION:**

PETROLEUM DISTRIBUTION TERMINAL

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: N-845-0-1

EXPIRATION DATE: 07/31/2017

## 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 and San Joaquin County Rule 110] 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 and San Joaquin County Rule 110] 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: TESORO LOGISTICS OPERATIONS LLC

Location: 3003 NAVY DR, STOCKTON, CA 95206

N-845-0-1 : Oct 11 2012 9:08AM -- BOW

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 San Joaquin County Rule 401] 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. On October 31, 2012, the initial Title V permit was issued. The reporting periods for reports including the required monitoring and certification of compliance 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: N-845-1-3

EXPIRATION DATE: 07/31/2017

## EQUIPMENT DESCRIPTION:

ONE 420,000 GALLON GASOLINE STORAGE TANK (NO. 20) WITH A STEEL PAN INTERNAL FLOATING ROOF WITH A METAL SHOE PRIMARY SEAL AND A FABRIC WIPER SECONDARY SEAL

## PERMIT UNIT REQUIREMENTS

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1. True vapor pressure of the organic liquid stored shall be less than 11 psia. [District Rule 4623, 5.1.1] Federally Enforceable Through Title V Permit
2. The internal floating roof shall float on the surface of the stored liquid at all times (i.e., off the roof leg supports) except during the initial fill until the roof is lifted off the leg supports and when the tank is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five calendar days prior to performing the work. The tank must be in compliance with this rule before it may land on its legs. [District Rule 4623, 5.3.1.3 and 5.4.3, 40 CFR 60.112b(a)(1)(i), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
3. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623, 5.3.2.1.1 and 5.4.1] Federally Enforceable Through Title V Permit
4. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623, 5.3.2.1.1 and 5.4.1] Federally Enforceable Through Title V Permit
5. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623, 5.3.2.1.1 and 5.4.1] Federally Enforceable Through Title V Permit
6. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623, 5.3.2.1.1 and 5.4.1] Federally Enforceable Through Title V Permit
7. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623, 5.3.2.1.2 and 5.4.1] Federally Enforceable Through Title V Permit
8. The cumulative length of all gaps between the tank shell and the secondary seal, greater than 1/8 inch shall not exceed 5% of the tank circumference. [District Rule 4623, 5.3.2.1.2 and 5.4.1] Federally Enforceable Through Title V Permit
9. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623, 5.3.2.1.3 and 5.4.1] Federally Enforceable Through Title V Permit
10. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623, 5.3.2.1.4 and 5.4.1] Federally Enforceable Through Title V Permit
11. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623, 5.3.2.1.5 and 5.4.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623, 5.3.2.1.6 and 5.4.1] Federally Enforceable Through Title V Permit
13. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623, 5.3.2.1.7 and 5.4.1] Federally Enforceable Through Title V Permit
14. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623, 5.2 and 5.5.1] Federally Enforceable Through Title V Permit
15. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A reading in excess to 10,000 ppmv, as methane, above background, or dripping of organic liquid at a rate of more than 3 drops per minute, is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.11, 3.17, 3.18, and 6.4.8] Federally Enforceable Through Title V Permit
16. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.1.1, 40 CFR 60.112b(a)(1)(iii), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
17. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623, 5.5.2.1.2, 40 CFR 60.112b(a)(1)(iv), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
18. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.1.3, 40 CFR 60.112b(a)(1)(v), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
19. Rim vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623, 5.5.2.1.4, 40 CFR 60.112b(a)(1)(vi), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
20. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623, 5.5.2.1.5, 40 CFR 60.112b(a)(1)(vii), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
21. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. The fabric sleeve must be impermeable. [District Rule 4623, 5.5.2.1.6, 40 CFR 60.112b(a)(1)(viii), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
22. Each penetration of the internal floating roof that allows for the passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix) and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
23. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually inspect the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 5] 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.

24. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
25. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
26. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
27. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 5 shall constitute a violation of this rule. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
28. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
29. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
30. The permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 4623, 5.7.5.1] Federally Enforceable Through Title V Permit
31. During tank cleaning operations, draining and refilling of this tank shall occur as a continuous process and shall proceed as rapidly as practicable while the roof is not floating on the surface of the stored liquid. [District Rule 4623, 5.7.5.4.8] Federally Enforceable Through Title V Permit
32. Gap seal requirements shall not apply while the roof is resting on its legs, and during the processes of draining, degassing, or refilling the tank. A leak-free condition will not be required if the operator is draining or refilling this tank in a continuous, expeditious manner. [District Rule 4623, 5.7.5.4.9] Federally Enforceable Through Title V Permit
33. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 4623, 5.7.5.4.10] Federally Enforceable Through Title V Permit
34. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623, 5.7.5.5.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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35. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623, 5.7.5.5.2] Federally Enforceable Through Title V Permit
36. During sludge removal, the operator shall control emissions from the sludge receiving vessel by operating an APCO-approved vapor control device that reduces emissions of organic vapors by at least 95%. [District Rule 4623, 5.7.5.6.1] Federally Enforceable Through Title V Permit
37. The permittee shall only transport removed sludge in closed, liquid leak-free containers. [District Rule 4623, 5.7.5.6.2] Federally Enforceable Through Title V Permit
38. The permittee shall store removed sludge, until final disposal, in vapor leak-free containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rules 2020 and 4623, 5.7.5.6.3] Federally Enforceable Through Title V Permit
39. For newly constructed, repaired, or rebuilt internal floating roof tanks, the permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623, 6.1.4.1, CFR 60.113b(a)(1), 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
40. If any failure (i.e. visible organic liquid on the internal floating roof, tank walls or anywhere, holes or tears in the seal fabric) is detected during 12 month visual inspection, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If the detected failure cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the APCO in the inspection report. Such a request must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 60.113b(a)(2) and 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
41. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623, 6.1.4.2, 40 CFR 60.113b(a)(2), and 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
42. The permittee shall visually inspect the internal floating roof, the primary seal and/or secondary seal, gaskets, slotted membrane and/or sleeve seals each time the storage tank is emptied and degassed. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to refilling the tank. [40 CFR 60.113b(a)(4) and 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
43. The permittee shall notify the District in writing at least 30 days prior to conduct the visual inspection of the storage vessel, so the District can arrange an observer. [40 CFR 60.113b(a)(5) and 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
44. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. Other than the gap criteria specified by this permit, no holes, tears, or other openings are allowed that would permit the escape of hydrocarbon vapors. Any defects found shall constitute a violation of this rule. [District Rule 4623, 6.1.4.3 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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45. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of this rule, including the following: 1) Date the storage vessel was emptied, date of inspection and names and titles of company personnel doing the inspection. 2) Tank identification number and Permit to Operate number. 3) Observed condition of each component of the control equipment (seals, internal floating roof, and fittings). 4) Measurements of the gaps between the tank shell and primary and secondary seals. 5) Leak free status of the tank and floating roof deck fittings. Records of the leak-free status shall include the vapor concentration values measured in parts per million by volume (ppmv). 6) Data, supported by calculations, demonstrating compliance with the requirements specified in Sections 5.4 and 5.5.2.4.3 of Rule 4623. 7) Nature of defects and any corrective actions or repairs performed on the tank in order to comply with rule 4623 and 40 CFR Part 60 Subpart Kb and the date(s) such actions were taken. [District Rule 4623, 6.3.5, 40 CFR 60.115b(a), and 40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
46. Each calendar month, the owner or operator shall perform leak inspection of all equipment in gasoline service. Equipment in gasoline service is defined as a piece of equipment used in a system that transfers gasoline or gasoline vapors. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. [40 CFR 63.11089(a)] Federally Enforceable Through Title V Permit
47. For monthly leak inspection, a log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [40 CFR 63.11089(b) and 40 CFR 63.11094(d)] Federally Enforceable Through Title V Permit
48. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report the reason(s) why the repair was not feasible and the date each repair was completed. [40 CFR 63.11089(c) and (d) and 40 CFR 63.11095(a)(3)] Federally Enforceable Through Title V Permit
49. The permittee shall submit a semi-annual compliance report that contains all required information stipulated under 40 CFR 63.11095(a) to the Administrator and the District. [40 CFR 63.11095(a)] Federally Enforceable Through Title V Permit
50. The permittee shall maintain a log book that contains the following information: 1.) dates of leak inspections, 2.) the nature of the leak and the method of detection; 3.) findings, 4.) corrective action (date each leak is repaired), 5.) repair methods applied in each attempt to repair the leak; 6.) the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak; 7.) the date of successful repair of the leak; and 8.) inspector name and signature. [40 CFR 63.11089(g), 40 CFR 63.11094(e)] Federally Enforceable Through Title V Permit
51. The permittee shall submit an excess emissions report that contains all required information that stipulated under 40 CFR 63.11095(b)(5) to the Administrator and the District. The excess emissions report shall be submitted along with the semi-annual compliance report. [40 CFR 63.11095(b)(5)] Federally Enforceable Through Title V Permit
52. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel, and these records shall be kept for the life of the source. [40 CFR 60.116b(b)] Federally Enforceable Through Title V Permit
53. The permittee shall maintain records of the volatile organic liquid stored, the period of storage, and TVP of that volatile organic liquid during the respective storage period. TVP shall be determined using the data on the Reid vapor pressure (highest receipt or highest tank sample results) and actual storage temperature. [40 CFR 60.116b(c)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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54. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3.7] Federally Enforceable Through Title V Permit
55. All records shall be maintained on site for a period of at least of five years and shall be made available for District, ARB, and EPA inspection upon request. [District Rule 4623, 6.3, 40 CFR 60.116b(a), and 40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-845-4-2

EXPIRATION DATE: 07/31/2017

## EQUIPMENT DESCRIPTION:

ONE 714,000 GALLON WELDED EXTERNAL FLOATING ROOF ORGANIC LIQUID STORAGE TANK (NO. 1700) WITH A MECHANICAL SHOE PRIMARY SEAL AND A SECONDARY WIPER SEAL

## PERMIT UNIT REQUIREMENTS

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1. True vapor pressure of the organic liquid stored shall be less than 11 psia. [District Rule 4623, 5.1.1] Federally Enforceable Through Title V Permit
2. The tank shall be equipped with a floating roof consisting of a pan type that was installed before December 20, 2001, pontoon-type or double-deck-type cover which rests upon the surface of the liquid being stored and is equipped with a closure device between the tank shell and roof edge consisting of two seals, one above the other; the one below shall be referred to as the primary seal, and the one above shall be referred to as the secondary seal. [District Rule 4623, 5.3.1.1 and 5.3.1.2 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
3. The external floating roof shall float on the surface of the stored liquid at all times (i.e., off the roof leg supports) except during the initial fill until the roof is lifted off the leg supports and when the tank is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five calendar days prior to performing the work. The tank must be in compliance with this rule before it may land on its legs. [District Rule 4623, 5.3.1.3 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
4. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623, 5.3.2.1.1] Federally Enforceable Through Title V Permit
5. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623, 5.3.2.1.1] Federally Enforceable Through Title V Permit
6. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623, 5.3.2.1.1] Federally Enforceable Through Title V Permit
7. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623, 5.3.2.1.1] Federally Enforceable Through Title V Permit
8. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623, 5.3.2.1.2] Federally Enforceable Through Title V Permit
9. The cumulative length of all gaps between the tank shell and the secondary seal, greater than 1/8 inch shall not exceed 5% of the tank circumference. [District Rule 4623, 5.3.2.1.2] Federally Enforceable Through Title V Permit
10. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 24 inches above the stored liquid surface. [District Rule 4623, 5.3.2.1.3] Federally Enforceable Through Title V Permit
11. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623, 5.3.2.1.4] Federally Enforceable Through Title V Permit

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12. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623, 5.3.2.1.5] Federally Enforceable Through Title V Permit
13. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623, 5.3.2.1.6] Federally Enforceable Through Title V Permit
14. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623, 5.3.2.1.7] Federally Enforceable Through Title V Permit
15. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623, 5.2 and 5.5.1] Federally Enforceable Through Title V Permit
16. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A reading in excess to 10,000 ppmv, as methane, above background, or dripping of organic liquid at a rate of more than 3 drops per minute, is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.11, 3.17, 3.18, and 6.4.8] Federally Enforceable Through Title V Permit
17. Each opening in the roof, except for automatic bleeder vents, rim vents, and pressure relief vents, in a non-contact external floating roof shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.2.1 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
18. Except for automatic bleeder vents and rim vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times (i.e., no visible gap) except when in actual use. [District Rule 4623, 5.5.2.2.2 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
19. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.2.3 and 40 CFR 60.112b(a)(2)(iii) and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
20. Rim vents shall be equipped with a gasket and shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. [District Rule 4623, 5.5.2.2.4 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
21. Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. The fabric cover must be impermeable if the liquid is drained into the contents of the tanks. [District Rule 4623, 5.5.2.2.5 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
22. External floating roof legs shall be equipped with vapor socks or vapor barriers in order to maintain a gas-tight condition so as to prevent VOC emissions from escaping through the roof leg opening. [District Rule 4623, 5.5.2.2.6] Federally Enforceable Through Title V Permit
23. All slotted sampling and gauging wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.4.1] Federally Enforceable Through Title V Permit
24. The slotted guidepole well on a external floating roof shall be equipped with the following: a sliding cover, a well gasket, a pole sleeve, a pole wiper, and an internal float and float wiper designed to minimize the gap between the float and the well, and provided the gap shall not exceed 1/8 inch; or shall be equipped with a well gasket, a zero gap pole wiper seal and a pole sleeve that projects below the liquid surface. [District Rule 4623, 5.5.2.4.2] Federally Enforceable Through Title V Permit

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25. The gap between the pole wiper and the slotted guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed 1/8 inch. [District Rule 4623, 5.5.2.4.3] Federally Enforceable Through Title V Permit
26. Operator shall visually inspect tank valves, flanges, and connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 4] Federally Enforceable Through Title V Permit
27. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 4] Federally Enforceable Through Title V Permit
28. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 4] Federally Enforceable Through Title V Permit
29. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 4] Federally Enforceable Through Title V Permit
30. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 4 shall constitute a violation of this rule. [District Rule 4623, Table 4] Federally Enforceable Through Title V Permit
31. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 4] Federally Enforceable Through Title V Permit
32. Permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 4623, 5.7.5.1] Federally Enforceable Through Title V Permit
33. During tank cleaning operations, draining and refilling of this tank shall occur as a continuous process and shall proceed as rapidly as practicable while the roof is not floating on the surface of the stored liquid. [District Rule 4623, 5.7.5.4.8] Federally Enforceable Through Title V Permit
34. Gap seal requirements shall not apply while the roof is resting on its legs, and during the processes of draining, degassing, or refilling the tank. A leak-free condition will not be required if the operator is draining or refilling this tank in a continuous, expeditious manner. [District Rule 4623, 5.7.5.4.9] Federally Enforceable Through Title V Permit
35. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 4623, 5.7.5.4.10] 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.

36. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623, 5.7.5.5.1] Federally Enforceable Through Title V Permit
37. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623, 5.7.5.5.2] Federally Enforceable Through Title V Permit
38. During sludge removal, the operator shall control emissions from the sludge receiving vessel by operating an APCO-approved vapor control device that reduces emissions of organic vapors by at least 95%. [District Rule 4623, 5.7.5.6.1] Federally Enforceable Through Title V Permit
39. The permittee shall only transport removed sludge in closed, liquid leak-free containers. [District Rule 4623, 5.7.5.6.2] Federally Enforceable Through Title V Permit
40. The permittee shall store removed sludge, until final disposal, in vapor leak-free containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rules 2020 and 4623, 5.7.5.6.3] Federally Enforceable Through Title V Permit
41. The permittee of external floating roof tanks shall make the primary seal envelope available for unobstructed inspection by the APCO on an annual basis at locations selected along its circumference at random by the APCO. In the case of riveted tanks with toroid-type seals, a minimum of eight locations shall be made available; in all other cases, a minimum of four locations shall be made available. If the APCO suspects a violation may exist the APCO may require such further unobstructed inspection of the primary seal as may be necessary to determine the seal condition for its entire circumference. [District Rule 4623, 6.1.1] Federally Enforceable Through Title V Permit
42. The operator shall perform gap measurements on primary and secondary seals within 60 days of the initial fill with petroleum liquid and at least once every year thereafter to determine compliance with the requirements of Rule 4623. The actual gap measurements of the floating roof primary and secondary seals shall be recorded. The inspection results shall be submitted to the APCO as specified in Section 6.3.5. [District Rule 4623, 6.1.3.1, 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(2)] Federally Enforceable Through Title V Permit
43. If this unit ceases to store volatile organic liquid (VOL) for a period of one year or more, subsequent introduction of VOL into the vessel shall be considered an initial fill in accordance with the conditions of this permit. [40 CFR 63.11087(c) and 40 CFR 63.11092(e)(2)] Federally Enforceable Through Title V Permit
44. If primary or secondary seal gap width/accumulated area and minimum vertical distance for one end of the mechanical shoe do not meet the requirements in this permit during 12 month inspection, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If the detected failure cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the APCO in the inspection report. Such a request must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 63.11087(c) and 40 CFR 63.11092(e)(2)] Federally Enforceable Through Title V Permit
45. The owner or operator shall visually inspect the external floating roof, the primary seal, secondary seal, and fittings each time the vessel is emptied and degassed. If the external floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, the owner or operator shall repair the items as necessary so that none of the conditions specified mentioned in this condition exist before filling or refilling the storage vessel. Actual gap measurements shall be performed when the liquid level is static but not more than 48 hours after the tank roof is re-floated. [District Rule 4623, 6.1.3.2, 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(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.

Facility Name: TESORO LOGISTICS OPERATIONS LLC

Location: 3003 NAVY DR, STOCKTON, CA 95208

N-845-4-2 : Oct 11 2012 9:00AM -- SOW

46. If any failure (i.e. visible organic liquid on the external floating roof, tank walls or anywhere, holes or tears in the seal fabric) is detected during 12 month visual inspection, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If the detected failure cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the APCO in the inspection report. Such a request must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 63.11087(c) and 40 CFR 63.11092(e)(2)] Federally Enforceable Through Title V Permit
47. Each calendar month, the owner or operator shall perform leak inspection of all equipment in gasoline service. Equipment in gasoline service is defined as a piece of equipment used in a system that transfers gasoline or gasoline vapors. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. [40 CFR 63.11089(a)] Federally Enforceable Through Title V Permit
48. For monthly leak inspection, a log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [40 CFR 63.11089(b) and 40 CFR 63.11094(d)] Federally Enforceable Through Title V Permit
49. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report the reason(s) why the repair was not feasible and the date each repair was completed. [40 CFR 63.11089(c) and (d) and 40 CFR 63.11095(a)(3)] Federally Enforceable Through Title V Permit
50. The permittee shall submit a semi-annual compliance report that contains all required information stipulated under 40 CFR 63.11095(a) to the Administrator and the District. [40 CFR 63.11095(a)] Federally Enforceable Through Title V Permit
51. The permittee shall maintain a log book that contains the following information: 1.) dates of leak inspections, 2.) the nature of the leak and the method of detection; 3.) findings, 4.) corrective action (date each leak is repaired), 5.) repair methods applied in each attempt to repair the leak; 6.) the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak; 7.) the date of successful repair of the leak; and 8.) inspector name and signature. [40 CFR 63.11089(g) and 40 CFR 63.11094(e)] Federally Enforceable Through Title V Permit
52. The permittee shall submit an excess emissions report that contains all required information that stipulated under 40 CFR 63.11095(b)(5) to the Administrator and the District. The excess emissions report shall be submitted along with the semi-annual compliance report. [40 CFR 63.11095(b)(5)] Federally Enforceable Through Title V Permit
53. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of this rule, including the following: 1) Date the storage vessel was emptied, date of inspection and names and titles of company personnel doing the inspection. 2) Tank identification number and Permit to Operate number. 3) Observed condition of each component of the control equipment (seals, external floating roof, and fittings). 4) Measurements of the gaps between the tank shell and primary and secondary seals. 5) Leak free status of the tank and floating roof deck fittings. Records of the leak-free status shall include the vapor concentration values measured in parts per million by volume (ppmv). 6) Data, supported by calculations, demonstrating compliance with the requirements specified in Sections 5.4 and 5.5.2.4.3 of Rule 4623. [District Rule 4623, 6.3.5 and 40 CFR 63.11087(e)] 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.

54. Permittee shall maintain the records of the external floating roof landing activities that are performed pursuant to Rule 4623, Section 5.3.1.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3.7] Federally Enforceable Through Title V Permit
55. All records shall be maintained on site for a period of at least of five years and shall be made available for District, ARB, and EPA inspection upon request. [District Rule 4623, 6.3, and 40 CFR 63.11094(a)] 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: N-845-5-3

EXPIRATION DATE: 07/31/2017

## EQUIPMENT DESCRIPTION:

ONE 840,000 GALLON GASOLINE STORAGE TANK (NO. 40) WITH A STEEL PAN INTERNAL FLOATING ROOF WITH A METAL SHOE PRIMARY SEAL AND A FABRIC WIPER SECONDARY SEAL

## PERMIT UNIT REQUIREMENTS

1. True vapor pressure of the organic liquid stored shall be less than 11 psia. [District Rule 4623, 5.1.1] Federally Enforceable Through Title V Permit
2. The internal floating roof shall float on the surface of the stored liquid at all times (i.e., off the roof leg supports) except during the initial fill until the roof is lifted off the leg supports and when the tank is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five calendar days prior to performing the work. The tank must be in compliance with this rule before it may land on its legs. [District Rule 4623, 5.3.1.3 and 5.4.3, 40 CFR 60.112b(a)(1)(i), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
3. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623, 5.3.2.1.1 and 5.4.1] Federally Enforceable Through Title V Permit
4. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623, 5.3.2.1.1 and 5.4.1] Federally Enforceable Through Title V Permit
5. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623, 5.3.2.1.1 and 5.4.1] Federally Enforceable Through Title V Permit
6. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623, 5.3.2.1.1 and 5.4.1] Federally Enforceable Through Title V Permit
7. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623, 5.3.2.1.2 and 5.4.1] Federally Enforceable Through Title V Permit
8. The cumulative length of all gaps between the tank shell and the secondary seal, greater than 1/8 inch shall not exceed 5% of the tank circumference. [District Rule 4623, 5.3.2.1.2 and 5.4.1] Federally Enforceable Through Title V Permit
9. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623, 5.3.2.1.3 and 5.4.1] Federally Enforceable Through Title V Permit
10. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623, 5.3.2.1.4 and 5.4.1] Federally Enforceable Through Title V Permit
11. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623, 5.3.2.1.5 and 5.4.1] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623, 5.3.2.1.6 and 5.4.1] Federally Enforceable Through Title V Permit
13. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623, 5.3.2.1.7 and 5.4.1] Federally Enforceable Through Title V Permit
14. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623, 5.2 and 5.5.1] Federally Enforceable Through Title V Permit
15. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A reading in excess to 10,000 ppmv, as methane, above background, or dripping of organic liquid at a rate of more than 3 drops per minute, is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.11, 3.17, 3.18, and 6.4.8] Federally Enforceable Through Title V Permit
16. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623, 5.5.2.1.1, 40 CFR 60.112b(a)(1)(iii), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
17. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623, 5.5.2.1.2, 40 CFR 60.112b(a)(1)(iv), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
18. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623, 5.5.2.1.3, 40 CFR 60.112b(a)(1)(v), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
19. Rim vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623, 5.5.2.1.4, 40 CFR 60.112b(a)(1)(vi), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
20. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623, 5.5.2.1.5, 40 CFR 60.112b(a)(1)(vii), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
21. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. The fabric sleeve must be impermeable. [District Rule 4623, 5.5.2.1.6, 40 CFR 60.112b(a)(1)(viii), and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
22. Each penetration of the internal floating roof that allows for the passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix) and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
23. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually inspect the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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24. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
25. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
26. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
27. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 5 shall constitute a violation of this rule. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
28. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
29. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 5] Federally Enforceable Through Title V Permit
30. The permittee shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 4623, 5.7.5.1] Federally Enforceable Through Title V Permit
31. During tank cleaning operations, draining and refilling of this tank shall occur as a continuous process and shall proceed as rapidly as practicable while the roof is not floating on the surface of the stored liquid. [District Rule 4623, 5.7.5.4.8] Federally Enforceable Through Title V Permit
32. Gap seal requirements shall not apply while the roof is resting on its legs, and during the processes of draining, degassing, or refilling the tank. A leak-free condition will not be required if the operator is draining or refilling this tank in a continuous, expeditious manner. [District Rule 4623, 5.7.5.4.9] Federally Enforceable Through Title V Permit
33. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 4623, 5.7.5.4.10] Federally Enforceable Through Title V Permit
34. While performing tank cleaning activities, operators may only use the following cleaning agents: diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623, 5.7.5.5.1] 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.



35. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623, 5.7.5.5.2] Federally Enforceable Through Title V Permit
36. During sludge removal, the operator shall control emissions from the sludge receiving vessel by operating an APCO-approved vapor control device that reduces emissions of organic vapors by at least 95%. [District Rule 4623, 5.7.5.6.1] Federally Enforceable Through Title V Permit
37. The permittee shall only transport removed sludge in closed, liquid leak-free containers. [District Rule 4623, 5.7.5.6.2] Federally Enforceable Through Title V Permit
38. The permittee shall store removed sludge, until final disposal, in vapor leak-free containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rules 2020 and 4623, 5.7.5.6.3] Federally Enforceable Through Title V Permit
39. For newly constructed, repaired, or rebuilt internal floating roof tanks, the permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623, 6.1.4.1, CFR 60.113b(a)(1), 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
40. If any failure (i.e. visible organic liquid on the internal floating roof, tank walls or anywhere, holes or tears in the seal fabric) is detected during 12 month visual inspection, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If the detected failure cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the APCO in the inspection report. Such a request must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 60.113b(a)(2) and 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
41. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623, 6.1.4.2, 40 CFR 60.113b(a)(2), and 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
42. The permittee shall visually inspect the internal floating roof, the primary seal and/or secondary seal, gaskets, slotted membrane and/or sleeve seals each time the storage tank is emptied and degassed. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to refilling the tank. [40 CFR 60.113b(a)(4) and 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
43. The permittee shall notify the District in writing at least 30 days prior to conduct the visual inspection of the storage vessel, so the District can arrange an observer. [40 CFR 60.113b(a)(5) and 40 CFR 63.11087(c), and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
44. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. Other than the gap criteria specified by this permit, no holes, tears, or other openings are allowed that would permit the escape of hydrocarbon vapors. Any defects found shall constitute a violation of this rule. [District Rule 4623, 6.1.4.3 and 40 CFR 63.11087(c)] 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.



45. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of this rule, including the following: 1) Date the storage vessel was emptied, date of inspection and names and titles of company personnel doing the inspection. 2) Tank identification number and Permit to Operate number. 3) Observed condition of each component of the control equipment (seals, internal floating roof, and fittings). 4) Measurements of the gaps between the tank shell and primary and secondary seals. 5) Leak free status of the tank and floating roof deck fittings. Records of the leak-free status shall include the vapor concentration values measured in parts per million by volume (ppmv). 6) Data, supported by calculations, demonstrating compliance with the requirements specified in Sections 5.4 and 5.5.2.4.3 of Rule 4623. 7) Nature of defects and any corrective actions or repairs performed on the tank in order to comply with rule 4623 and 40 CFR Part 60 Subpart Kb and the date(s) such actions were taken. [District Rule 4623, 6.3.5, 40 CFR 60.115b(a), and 40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
46. Each calendar month, the owner or operator shall perform leak inspection of all equipment in gasoline service. Equipment in gasoline service is defined as a piece of equipment used in a system that transfers gasoline or gasoline vapors. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. [40 CFR 63.11089(a)] Federally Enforceable Through Title V Permit
47. For monthly leak inspection, a log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [40 CFR 63.11089(b) and 40 CFR 63.11094(d)] Federally Enforceable Through Title V Permit
48. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report the reason(s) why the repair was not feasible and the date each repair was completed. [40 CFR 63.11089(c) and (d) and 40 CFR 63.11095(a)(3)] Federally Enforceable Through Title V Permit
49. The permittee shall submit a semi-annual compliance report that contains all required information stipulated under 40 CFR 63.11095(a) to the Administrator and the District. [40 CFR 63.11095(a)] Federally Enforceable Through Title V Permit
50. The permittee shall maintain a log book that contains the following information: 1.) dates of leak inspections, 2.) the nature of the leak and the method of detection; 3.) findings, 4.) corrective action (date each leak is repaired), 5.) repair methods applied in each attempt to repair the leak; 6.) the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak; 7.) the date of successful repair of the leak; and 8.) inspector name and signature. [40 CFR 63.11089(g), 40 CFR 63.11094(e)] Federally Enforceable Through Title V Permit
51. The permittee shall submit an excess emissions report that contains all required information that stipulated under 40 CFR 63.11095(b)(5) to the Administrator and the District. The excess emissions report shall be submitted along with the semi-annual compliance report. [40 CFR 63.11095(b)(5)] Federally Enforceable Through Title V Permit
52. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel, and these records shall be kept for the life of the source. [40 CFR 60.116b(b)] Federally Enforceable Through Title V Permit
53. The permittee shall maintain records of the volatile organic liquid stored, the period of storage, and TVP of that volatile organic liquid during the respective storage period. TVP shall be determined using the data on the Reid vapor pressure (highest receipt or highest tank sample results) and actual storage temperature. [40 CFR 60.116b(c)] 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.

54. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623, 6.3.7] Federally Enforceable Through Title V Permit
55. All records shall be maintained on site for a period of at least of five years and shall be made available for District, ARB, and EPA inspection upon request. [District Rule 4623, 6.3, 40 CFR 60.116b(a), and 40 CFR 63.11094(a)] 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:** N-845-6-2

**EXPIRATION DATE:** 07/31/2017

**EQUIPMENT DESCRIPTION:**

LOADING RACK SERVED BY CARB-CERTIFIED HYDROTECH CARBON ADSORPTION/ABSORPTION VAPOR RECOVERY SYSTEM (N-845-22)

## PERMIT UNIT REQUIREMENTS

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1. The quantity of organic liquids (as defined in District Rule 4624) loaded through this loading rack and the entire facility shall not exceed 450,000 gallons in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. All vapors displaced from tank truck loading shall be vented to the vapor recovery system under Permit to Operate N-845-22. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The owner or operator shall comply with the control requirements specified in option 1 of Table 2 to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart BBBBBB (6B) by August 1, 2013. [40 CFR 63.11083(c)] Federally Enforceable Through Title V Permit
4. The owner or operator shall use submerged filling with a submerged fill pipe that is no more than 6 inches from the bottom of the cargo tank, and make records available within 24 hours of a request by the Administrator to document the gasoline throughput of this unit. [40.CFR 63.11088(a)] Federally Enforceable Through Title V Permit
5. This loading rack shall be equipped with bottom loading equipment and a vapor collection and control system such that VOC emissions shall not exceed 0.08 pounds per 1,000 gallons of organic liquid loaded. [District Rule 4624, 5.1] Federally Enforceable Through Title V Permit
6. The 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. [District Rule 4624, 5.4] Federally Enforceable Through Title V Permit
7. All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.08 pounds per 1,000 gallons of organic liquid loaded and which operate so the delivery tank does not exceed 18 inches water column pressure nor 6 inches water column vacuum. [District Rule 4624, 5.5] Federally Enforceable Through Title V Permit
8. The transfer rack and vapor collection equipment shall be installed, maintained, and operated such that there are no leaks and no excess organic liquid drainage at disconnections. A leak is 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 potential source in accordance with EPA Method 21. Excess organic liquid drainage is defined as an average of more than 10 milliliters liquid drainage per disconnect from three consecutive disconnects. [District Rule 4624, 3.13, 3.17, and 5.6] Federally Enforceable Through Title V Permit
9. The vapor collection system, the vapor processing system, and each transfer rack handling organic liquids shall be tested for leaks with a portable hydrocarbon analyzer in accordance with EPA Method 21, at least once every calendar quarter. [District Rule 4624, 5.9.1] 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. The equipment that are found leaking shall be repaired or replaced within 72 hours after detecting the leakage. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624, 5.9.3] Federally Enforceable Through Title V Permit
11. An owner or operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection, the inspection frequency shall revert back to quarterly, and the operator shall contact the APCO in writing within 14 days. [District Rule 4624, 5.9.4] Federally Enforceable Through Title V Permit
12. Each calendar month, the owner or operator shall perform leak inspection of all equipment in gasoline service. Equipment in gasoline service is defined as a piece of equipment used in a system that transfers gasoline or gasoline vapors. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. [40 CFR 63.11089(a)] Federally Enforceable Through Title V Permit
13. For monthly leak inspection, a log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [40 CFR 63.11089(b) and 40 CFR 63.11094(d)] Federally Enforceable Through Title V Permit
14. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report the reason(s) why the repair was not feasible and the date each repair was completed. [40 CFR 63.11089(c) and (d), and 40 CFR 63.11095(a)(3)] Federally Enforceable Through Title V Permit
15. Each calendar month, liquid drainage at disconnect of each loading arm shall be determined, and appropriate action shall be taken in case excess liquid drainage occurs from any loading arm. If no excess drainage conditions are found during five consecutive monthly inspections, the drainage inspection frequency may be changed from monthly to quarterly. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall return to monthly. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Liquid 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 minute of collection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. Documentation attesting to the vapor tightness of each truck loaded with gasoline shall be kept. The documentation file for each tank truck shall be updated at least once per year to reflect the current test results as determined by EPA Method 27. [40 CFR 63.11094(b)] Federally Enforceable Through Title V Permit
18. The owner or operator shall maintain a log book that contains the following information: 1.) dates of leak inspections, 2.) the nature of the leak and the method of detection; 3.) findings, 4.) corrective action (date each leak is repaired), 5.) repair methods applied in each attempt to repair the leak; 6.) the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak; 7.) the expected date of successful repair of the leak if the leak is not repaired within 15 days; 8.) the date of successful repair of the leak; and 9.) inspector name and signature. [District Rule 4624, 6.1.3, 40 CFR 63.11089(g), and 40 CFR 63.11094(e)] Federally Enforceable Through Title V Permit
19. The owner or operator shall report the number of equipment leaks not repaired within 15 days after detection in a semi-annual report. [40 CFR 63.11089(g)] Federally Enforceable Through Title V Permit
20. The owner or operator shall submit a semi-annual compliance report that includes each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. [40 CFR 63.11088(f) and 40 CFR 63.11095(a)(2)] Federally Enforceable Through Title V Permit
21. The owner or operator shall keep records of the daily organic liquids throughput in gallons. [District Rules 1070 and 4623, 6.1.3] 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.

22. All records shall be maintained on site for a period of at least of five years and shall be made available for District, ARB, and EPA inspection upon request. [District Rules 1070 and 4624, 6.1.4, and 40 CFR 63.11094(a)] 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:** N-845-10-1

**EXPIRATION DATE:** 07/31/2017

**EQUIPMENT DESCRIPTION:**

ONE 20,000 GALLON TRANSMIX STORAGE TANK SERVED BY CARB-CERTIFIED HYDROTECH CARBON ADSORPTION/ABSORPTION VAPOR RECOVERY SYSTEM (N-845-22)

## PERMIT UNIT REQUIREMENTS

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1. A leak-free condition is defined as a condition without a gas leak or a liquid leak. A gas leak is defined as a reading in excess of 10,000 parts per million by volume (ppmv), as methane, above background on a portable hydrocarbon detection instrument that is calibrated with methane in accordance with the procedures specified in EPA Method 21. A liquid leak is defined as the dripping of organic liquid at a rate of more than 3 drops per minute. A reading in excess to 10,000 ppmv, as methane, above background, or dripping of organic liquid at a rate of more than 3 drops per minute, is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623, 3.11, 3.17, 3.18, and 6.4.8] Federally Enforceable Through Title V Permit
2. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be an approved VOC recovery device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.6 of District Rule 4623. [District Rule 4623, 5.1.1 and 5.6.1] Federally Enforceable Through Title V Permit
3. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623, 5.6.2] Federally Enforceable Through Title V Permit
4. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623, 5.6.3] Federally Enforceable Through Title V Permit
5. The owner or operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
6. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
7. Upon detection of a gas leak, defined as a VOC concentration of greater than 10,000 ppmv measured in accordance with EPA Method 21 by a portable hydrocarbon detection instrument that is calibrated with methane, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rule 4623, Table 3] 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.

8. Components found to be leaking either liquids or gases shall be immediately affixed with a tag showing the component to be leaking. Operator shall maintain records of the liquid or gas leak detection readings, date/time the leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
9. Leaking components that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
10. If a component type for a given tank is found to leak during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
11. Any component found to be leaking on two consecutive annual inspections is in violation of this rule, even if covered under the voluntary inspection and maintenance program. [District Rule 4623, Table 3] Federally Enforceable Through Title V Permit
12. The owner or operator shall notify the APCO in writing at least three (3) days prior to performing tank degassing and interior tank cleaning activities. Written notification shall include the following: 1) the Permit to Operate number and physical location of the tank being degassed, 2) the date and time that tank degassing and cleaning activities will begin, 3) the degassing method, as allowed in this permit, to be used, 4) the method to be used to clean the tank, including any solvents to be used, and 5) the method to be used to dispose of any removed sludge, including methods that will be used to control emissions from the receiving vessel and emissions during transport. [District Rule 4623, 5.7.5] Federally Enforceable Through Title V Permit
13. This tank shall be degassed before commencing interior cleaning by following one of the following options: 1) exhausting VOCs contained in the tank vapor space to an APCO-approved vapor recovery system until the organic vapor concentration is 5,000 ppmv or less, or is 10 percent or less of the lower explosion limit (LEL), whichever is less, or 2) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable liquid until 90 percent or more of the maximum operating level of the tank is filled. Suitable liquids are organic liquids having a TVP of less than 0.5 psia, water, clean produced water, or produced water derived from crude oil having a TVP less than 0.5 psia, or 3) by displacing VOCs contained in the tank vapor space to an APCO-approved vapor recovery system by filling the tank with a suitable gas. Degassing shall continue until the operator has achieved a vapor displacement equivalent to at least 2.3 times the tank capacity. Suitable gases are air, nitrogen, carbon dioxide, or natural gas containing less than 10 percent VOC by weight. [District Rule 4623, 5.7.5.4] Federally Enforceable Through Title V Permit
14. During tank degassing, the operator shall discharge or displace organic vapors contained in the tank vapor space to an APCO-approved vapor recovery system. [District Rule 4623, 5.7.5.4.5] Federally Enforceable Through Title V Permit
15. To facilitate connection to an external APCO-approved vapor recovery system a suitable tank fitting, such as a manway, may be temporarily removed for a period of time not to exceed one hour. [District Rule 4623, 5.7.5.4.6] Federally Enforceable Through Title V Permit
16. This tank shall be in compliance with the applicable requirements of District Rule 4623 at all times during draining, degassing, and refilling the tank with an organic liquid having a TVP of 0.5 psia or greater. [District Rule 4623, 5.7.5.4.7] Federally Enforceable Through Title V Permit
17. After a tank has been degassed pursuant to the requirements of this permit, vapor control requirements are not applicable until an organic liquid having a TVP of 0.5 psia or greater is placed, held, or stored in this tank. [District Rule 4623, 5.7.5.4.10] Federally Enforceable Through Title V Permit
18. While performing tank cleaning activities, the owner or operators may only use the following cleaning agents: water and clean (produced) water, diesel, solvents with an initial boiling point of greater than 302 degrees F, solvents with a vapor pressure of less than 0.5 psia, or solvents with 50 grams of VOC per liter or less. [District Rule 4623, 5.7.5.5.1] 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.

19. Steam cleaning shall only be allowed at locations where wastewater treatment facilities are limited, or during the months of December through March. [District Rule 4623, 5.7.5.5.2] Federally Enforceable Through Title V Permit
20. During sludge removal from tanks containing organic liquids with a true vapor pressure of 1.5 psia or greater, the owner or operator shall vent emissions from the sludge receiving vessel to an APCO-approved vapor recovery system that reduces emissions of organic vapors by at least 95 percent. [District Rule 4623, 5.7.5.6.1] Federally Enforceable Through Title V Permit
21. The owner or operator shall only transport removed sludge from tanks containing organic liquids with a true vapor pressure of 1.5 psia or greater, in closed, liquid leak-free containers. [District Rule 4623, 5.7.5.6.2] Federally Enforceable Through Title V Permit
22. The owner or operator shall store removed sludge from tanks containing organic liquids with a true vapor pressure of 1.5 psia or greater, until final disposal, in vapor leak-free containers, or in tanks complying with the vapor control requirements of District Rule 4623. Sludge that is to be used to manufacture roadmix, as defined in District Rule 2020, is not required to be stored in this manner. Roadmix manufacturing operations exempt pursuant to District Rule 2020 shall maintain documentation of their compliance with Rule 2020, and shall readily make said documentation available for District inspection upon request. [District Rule 4623, 5.7.5.6.3] Federally Enforceable Through Title V Permit
23. The control efficiency of the vapor recovery system, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case US EPA Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25A provided the identity and approximate concentrations of the analyses/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of the known analytes/compounds to ensure that the VOC concentrations are neither under- or over-reported. Analysis of halogenated exempt compounds shall be analyzed by ARB Method 422 "Exempt Halogenated VOCs in Gases September 12, 1990". [District Rule 4623, 6.4.6 and 6.4.7] Federally Enforceable Through Title V Permit
24. The operator shall maintain an inspection log containing the following 1) type of component leaking; 2) date and time of leak detection, and method of detection; 3) date and time of leak repair, and emission level of recheck after leak is repaired; 4) method used to minimize the leak to lowest possible level within 8 hours after detection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
25. All records shall be maintained on site for a period of at least of five years and shall be made available for District, ARB, and EPA inspection upon request. [District Rule 4623, 6.3] 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: N-845-22-2

EXPIRATION DATE: 07/31/2017

## EQUIPMENT DESCRIPTION:

HYDROTECH CARBON ADSORPTION/ABSORPTION VAPOR RECOVERY SYSTEM

## PERMIT UNIT REQUIREMENTS

1. The VOC emissions from the vapor collection and control system shall not exceed 0.08 pounds per 1000 gallons of gasoline loaded. [District Rule 4624, 5.1] Federally Enforceable Through Title V Permit
2. The 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. [District Rule 4624, 5.4] Federally Enforceable Through Title V Permit
3. All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.08 pounds per 1,000 gallons of organic liquid loaded and which operate so the delivery tank does not exceed 18 inches water column pressure nor 6 inches water column vacuum. [District Rule 4624, 5.5] Federally Enforceable Through Title V Permit
4. The transfer rack and vapor collection equipment shall be installed, maintained, and operated such that there are no leaks and no excess organic liquid drainage at disconnections. A leak is 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 potential source in accordance with EPA Method 21. Excess organic liquid drainage is defined as an average of more than 10 milliliters liquid drainage per disconnect from three consecutive disconnects. [District Rule 4624, 3.13, 3.17, and 5.6] Federally Enforceable Through Title V Permit
5. The vapor collection system, the vapor processing system, and each transfer rack handling organic liquids shall be tested for leaks with a portable hydrocarbon analyzer in accordance with EPA Method 21, at least once every calendar quarter. [District Rule 4624, 5.9.1] Federally Enforceable Through Title V Permit
6. The equipment that are found leaking shall be repair or replaced within 72 hours after detecting the leakage. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624, 5.9.3] Federally Enforceable Through Title V Permit
7. An owner or operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection, the inspection frequency shall revert back to quarterly, and the operator shall contact the APCO in writing within 14 days. [District Rule 4624, 5.9.4] Federally Enforceable Through Title V Permit
8. Each calendar month, the owner or operator shall perform leak inspection of all equipment in gasoline service. Equipment in gasoline service is defined as a piece of equipment used in a system that transfers gasoline or gasoline vapors. For this inspection, detection methods incorporating sight, sound, and smell are acceptable. [40 CFR 63.11089(a)] 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.

9. For monthly leak inspection, a log book shall be used and shall be signed by the owner or operator at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [40 CFR 63.11089(b) and 40 CFR 63.11094(d)] Federally Enforceable Through Title V Permit
10. Each detection of a liquid or vapor leak shall be recorded in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The owner or operator shall provide in the semiannual report the reason(s) why the repair was not feasible and the date each repair was completed. [40 CFR 63.11089(c) and (d), and 40 CFR 63.11095(a)(3)] Federally Enforceable Through Title V Permit
11. During source testing, the loading rack's vapor collection and control system shall be tested at every loading position 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 2.5 mm water gauge, on the terminal's vapor collection and control system at a pressure tap as close as possible to the connection with the gasoline tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Source testing to demonstrate compliance with the VOC emission rate from the vapor recovery system serving the loading rack under Permit to Operate N-845-6 shall be conducted once every 60 months, but no more than 30 days before or after initial source test anniversary date. [District Rule 4624, 6.2.2] Federally Enforceable Through Title V Permit
13. Source testing shall be conducted using methods and procedures approved by District. The District must be notified 30 days prior to any compliance source testing and a pretest plan outlining the test methods and procedures shall be submitted for the District approval no later than 15 days prior to each test. [District Rule 1081, 6.0 and 7.1] Federally Enforceable Through Title V Permit
14. Source testing shall be witnessed or authorized by District Personnel and samples shall be collected and analyzed by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing company. [District Rule 1081, 7.2] Federally Enforceable Through Title V Permit
15. VOC emissions for source test purpose shall be determined using 40 CFR Part 60.503 "Test Methods and Procedures" and EPA Methods 2A, 2B, 25A and 25B, and ARB Method 422, or ARB Test Procedure TP-203.1. [District Rule 4624, 6.3.2] Federally Enforceable Through Title V Permit
16. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081, 7.3] Federally Enforceable Through Title V Permit
17. The owner or operator shall submit an excess emissions report to the Administrator at the time the semiannual compliance report is submitted. The report shall include all applicable information specified in 40 CFR 63.11095 (b)(1) through (5). [40 CFR 63.11095(b)] Federally Enforceable Through Title V Permit
18. Documentation attesting to the vapor tightness of each truck loaded with gasoline shall be kept. The documentation file for each tank truck shall be updated at least once per year to reflect the current test results as determined by EPA Method 27. [40 CFR 63.11094(b)] Federally Enforceable Through Title V Permit
19. The owner or operator shall maintain a log book that contains the following information: 1.) dates of leak inspections, 2.) the nature of the leak and the method of detection; 3.) findings, 4.) corrective action (date each leak is repaired), 5.) repair methods applied in each attempt to repair the leak; 6.) the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak; 7.) the expected date of successful repair of the leak if the leak is not repaired within 15 days; 8.) the date of successful repair of the leak; and 9.) inspector name and signature. [District Rule 4624, 6.1.3, 40 CFR 63.11089(g), and 40 CFR 63.11094(e)] Federally Enforceable Through Title V Permit
20. The owner or operator shall report the number of equipment leaks not repaired within 15 days after detection in a semi-annual report. [40 CFR 63.11089(g)] 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.

21. The owner or operator shall submit a semi-annual compliance report that includes each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. [40 CFR 63.11088(f) and 40 CFR 63.11095(a)(2)] Federally Enforceable Through Title V Permit
22. A log of all breakdowns of the vapor recovery system indicating the times, dates and gallons processed during the breakdown periods shall be maintained on the premises at all times and shall be made available for District inspection upon request. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
23. The owner or operator shall keep records of the daily organic liquids throughput in gallons. [District Rules 1070, 2520, 9.3.2, and 4623, 6.1.3] Federally Enforceable Through Title V Permit
24. All records shall be maintained on site for a period of at least of five years and shall be made available for District, ARB, and EPA inspection upon request. [District Rules 4624, 6.1.4 and 2520.9.4, and 40 CFR 63.11094(a)] 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: N-845-23-1

EXPIRATION DATE: 07/31/2017

**EQUIPMENT DESCRIPTION:**

4,000 GALLON DIESEL LUBRICITY ADDITIVE STORAGE TANK

## PERMIT UNIT REQUIREMENTS

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1. VOC emissions from this tank shall not exceed 0.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Annual throughput for this tank shall not exceed 11,857 gallons in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. This tank shall only store, place, or hold organic liquid with a true vapor pressure (TVP) of less than 0.5 psia under all storage conditions. [District Rule 4623, 4.4] Federally Enforceable Through Title V Permit
4. Permittee shall conduct true vapor pressure (TVP) testing of the organic liquid stored in this tank at least once every 24 months during summer (July - September), and/or whenever there is a change in the source or type of organic liquid stored in this tank in order to maintain exemption from the rule. [District Rule 4623, 6.2.2] Federally Enforceable Through Title V Permit
5. The API gravity of crude oil or petroleum distillate shall be determined by using ASTM Method D 287 e1 "Standard Test Method for API Gravity of Crude Petroleum and Petroleum Products (Hydrometer Method). Sampling for API gravity shall be performed in accordance with ASTM Method D 4057 "Standard Practices for Manual Sampling of Petroleum and Petroleum Products." [District Rule 4623, 6.4.2] Federally Enforceable Through Title V Permit
6. For crude oil with an API gravity of 26 degrees or less, the TVP shall be determined using the latest version of the Lawrence Berkeley National Laboratory "test Method for Vapor pressure of Reactive Organic Compounds in Heavy Crude Oil Using Gas Chromatograph", as approved by ARB and EPA. [District Rule 4623, 6.4.4] Federally Enforceable Through Title V Permit
7. The TVP testing shall be conducted at actual storage temperature of the organic liquid in the tank. The permittee shall also conduct an API gravity testing. [District Rule 4623, 6.4.5] Federally Enforceable Through Title V Permit
8. The permittee shall keep accurate records of each organic liquid stored in the tank, including its storage temperature, TVP, and API gravity. [District Rule 4623, 6.3.1] Federally Enforceable Through Title V Permit
9. Permittee shall submit the records of TVP and API gravity testing to the APCO within 45 days after the date of testing. The records shall include the tank identification number, Permit to Operate number, type of stored organic liquid, TVP and API gravity of the organic liquid, test methods used, and a copy of the test results. [District Rule 4623, 6.3.6] Federally Enforceable Through Title V Permit
10. The permittee shall maintain daily and cumulative annual throughput records in gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
11. All records shall be maintained on site for a period of at least of five years and shall be made available for District, ARB, and EPA inspection upon request. [District Rules 1070 and 4623, 6.3] 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

## Detailed Facility List

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**Detailed Facility Report**  
For Facility=845 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

TESORO LOGISTICS OPERATIONS LLC 3003 NAVY DR STOCKTON, CA 95206	FAC # STATUS: TELEPHONE:	N 845 A	TYPE: TOXIC ID:	TitleV 21236	EXPIRE ON: AREA: INSP. DATE:	07/31/2013 9/ 06/13
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-845-1-2	420,000 gallons	3020-05 E	1	246.00	246.00	A	ONE 420,000 GALLON GASOLINE STORAGE TANK (NO. 20) WITH A STEEL PAN INTERNAL FLOATING ROOF WITH A METAL SHOE PRIMARY SEAL AND A FABRIC WIPER SECONDARY SEAL
N-845-4-1	714,000 gallons	3020-05 F	1	301.00	301.00	A	ONE 714,000 GALLON WELDED EXTERNAL FLOATING ROOF ORGANIC LIQUID STORAGE TANK (NO. 1700) WITH A MECHANICAL SHOE PRIMARY SEAL AND A SECONDARY WIPER SEAL
N-845-5-2	840,000 gallons	3020-05 F	1	301.00	301.00	A	ONE 840,000 GALLON GASOLINE STORAGE TANK (NO. 40) WITH A STEEL PAN INTERNAL FLOATING ROOF WITH A METAL SHOE PRIMARY SEAL AND A FABRIC WIPER SECONDARY SEAL
N-845-6-1	Miscellaneous	3020-06	1	105.00	105.00	A	LOADING RACK SERVED BY CARB-CERTIFIED HYDROTECH CARBON ADSORPTION/ABSORPTION VAPOR RECOVERY SYSTEM (N-845-22)
N-845-10-0	20,000 GALLONS	3020-05 C	1	135.00	135.00	A	ONE 20,000 GALLON TRANSMIX STORAGE TANK SERVED BY CARB-CERTIFIED HYDROTECH CARBON ADSORPTION/ABSORPTION VAPOR RECOVERY SYSTEM (N-845-22)
N-845-22-1	42 hp electric motor	3020-01 B	1	117.00	117.00	A	HYDROTECH CARBON ADSORPTION/ABSORPTION VAPOR RECOVERY SYSTEM
N-845-23-0	4,000 gallons	3020-05 A	1	75.00	75.00	A	4,000 GALLON DIESEL LUBRICITY ADDITIVE STORAGE TANK

Number of Facilities Reported: 1

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# ATTACHMENT C

Exempt Equipment

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This facility has the following emission units that are considered insignificant emissions source, which are exempt from permitting requirements:

Facility Unit ID Number	Organic Liquid Stored	Tank Capacity (gallon)	Exemption Category	Rule 2020 Citation	Exempt ?
Tank 10	Additive	10,000	The unheated storage of organic material with an initial boiling point of 302°F or greater measured by test method ASTM D-86.	6.6.5	Yes
Tank 19	Diesel	383,460		6.6.5	Yes
Tank 29	Diesel	194,000		6.6.5	Yes
Tank 30	Diesel	194,000		6.6.5	Yes
Tank 275	Additive	500	Emissions less than 2.0 lb/day from units not belong to source category listed in 6.1 thru 6.18 of this rule.	6.19	Yes



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# ATTACHMENT D

Existing District Permit

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**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

  
**HEALTHY AIR LIVING™**

# Permit to Operate

**FACILITY:** N-845

**EXPIRATION DATE:** 07/31/2013

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

TESORO LOGISTICS OPERATIONS LLC  
ATTN: BROOKS NEIGHBORS  
19100 RIDGEWAY PARKWAY  
SAN ANTONIO, TX 78259

**FACILITY LOCATION:**

3003 NAVY DR  
STOCKTON, CA 95206

**FACILITY DESCRIPTION:**

PETROLEUM DISTRIBUTION TERMINAL

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

**PERMIT UNIT:** N-845-1-2

**EXPIRATION DATE:** 07/31/2013

**EQUIPMENT DESCRIPTION:**

ONE 420,000 GALLON GASOLINE STORAGE TANK (NO. 20) WITH A STEEL PAN INTERNAL FLOATING ROOF WITH A METAL SHOE PRIMARY SEAL AND A FABRIC WIPER SECONDARY SEAL

## PERMIT UNIT REQUIREMENTS

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1. This unit is subject to the requirements of 40 CFR Part 60, Subpart Kb: Standards of Performance for Storage Vessels for Petroleum Liquids. [District Rule 4001]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. The true vapor pressure of all liquids stored in this tank shall be less than 11 psia at actual storage conditions. [District Rule 4623]
4. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on it's legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623]
5. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623]
6. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623]
7. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623]
8. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623]
9. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623]
10. The cumulative length of all gaps between the tank shell and the secondary seal, greater than 1/8 inch shall not exceed 5% of the tank circumference. [District Rule 4623]
11. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623]
12. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623]
13. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623]
14. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623]
16. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623]
17. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
18. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623]
19. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623]
20. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623]
21. Rim vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623]
22. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623]
23. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. The fabric sleeve must be impermeable. [District Rule 4623]
24. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623]
25. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623]
26. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623]
27. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

28. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623]
29. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-845-4-1

EXPIRATION DATE: 07/31/2013

**EQUIPMENT DESCRIPTION:**

ONE 714,000 GALLON WELDED EXTERNAL FLOATING ROOF ORGANIC LIQUID STORAGE TANK (NO. 1700) WITH A MECHANICAL SHOE PRIMARY SEAL AND A SECONDARY WIPER SEAL

## PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. This tank shall be equipped with a closure device between the tank shell and roof edge consisting of two seals mounted one above the other; the one below shall be referred to as the primary seal, and the one above shall be referred to as the secondary seal. [District Rule 4623]
3. The external floating roof shall float on the surface of the stored liquid at all times (i.e., off the roof leg supports) except during the initial fill until the roof is lifted off the leg supports and when the tank is completely emptied and subsequently refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on its legs, the permittee shall notify the APCO in writing at least five calendar days prior to performing the work. The tank must be in compliance with this rule before it may land on its legs. [District Rule 4623]
4. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623]
5. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623]
6. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623]
7. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623]
8. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623]
9. The cumulative length of all gaps between the tank shell and the secondary seal, greater than 1/8 inch shall not exceed 5% of the tank circumference. [District Rule 4623]
10. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 24 inches above the stored liquid surface. [District Rule 4623]
11. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623]
12. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623]
13. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623]
14. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623]
16. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
17. Except for automatic bleeder vents, rim vents, and pressure relief vents, each opening in a non-contact external floating roof shall provide a projection below the liquid surface. [District Rule 4623]
18. Except for automatic bleeder vents and rim vents, roof drains, and leg sleeves, each opening in the roof shall be equipped with a gasketed cover, seal, or lid that shall be maintained in a closed position at all times (i.e., no visible gap) except when in actual use. [District Rule 4623]
19. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623]
20. Rim vents shall be equipped with a gasket and shall be set to open when the roof is being floated off the roof leg supports or at the manufacturer's recommended setting. [District Rule 4623]
21. Each emergency roof drain shall be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. The fabric cover must be impermeable if the liquid is drained into the contents of the tanks. [District Rule 4623]
22. External floating roof legs shall be equipped with vapor socks or vapor barriers in order to maintain a gas-tight condition so as to prevent VOC emissions from escaping through the roof leg opening. [District Rule 4623]
23. All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623]
24. The solid guidepole well shall be equipped with a pole wiper and a gasketed cover, seal or lid which shall be in a closed position at all times (i.e., no visible gap) except when the well is in use. [District Rule 4623]
25. The gap between the pole wiper and the solid guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed 1/2 inch. [District Rule 4623]
26. The slotted guidepole well on a external floating roof shall be equipped with the following: a sliding cover, a well gasket, a pole sleeve, a pole wiper, and an internal float and float wiper designed to minimize the gap between the float and the well, and provided the gap shall not exceed 1/8 inch; or shall be equipped with a well gasket, a zero gap pole wiper seal and a pole sleeve that projects below the liquid surface. [District Rule 4623]
27. The gap between the pole wiper and the slotted guidepole shall be added to the gaps measured to determine compliance with the secondary seal requirement, and in no case shall exceed 1/8 inch. [District Rule 4623]
28. The permittee of external floating roof tanks shall make the primary seal envelope available for unobstructed inspection by the APCO on an annual basis at locations selected along its circumference at random by the APCO. In the case of riveted tanks with toroid-type seals, a minimum of eight locations shall be made available; in all other cases, a minimum of four locations shall be made available. If the APCO suspects a violation may exist the APCO may require such further unobstructed inspection of the primary seal as may be necessary to determine the seal condition for its entire circumference. [District Rule 4623]
29. The permittee shall inspect all floating tanks at least once every 12 months to determine compliance with the requirements of this rule. The actual gap measurements of the floating roof primary and secondary seals shall be recorded. The inspection results shall be submitted to the APCO as specified in Section 6.3.5. [District Rule 4623]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

30. The permittee shall inspect the primary and secondary seals for compliance with the requirements of this rule every time a tank is emptied or degassed. Actual gap measurements shall be performed when the liquid level is static but not more than 24 hours after the tank roof is re-floated. [District Rule 4623]
31. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623]
32. Permittee shall maintain the records of the external floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623]
33. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

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



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-845-5-2

**EXPIRATION DATE:** 07/31/2013

**EQUIPMENT DESCRIPTION:**

ONE 840,000 GALLON GASOLINE STORAGE TANK (NO. 40) WITH A STEEL PAN INTERNAL FLOATING ROOF WITH A METAL SHOE PRIMARY SEAL AND A FABRIC WIPER SECONDARY SEAL

## PERMIT UNIT REQUIREMENTS

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1. This unit is subject to the requirements of 40 CFR Part 60, Subpart Kb: Standards of Performance for Storage Vessels for Petroleum Liquids. [District Rule 4001]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. The true vapor pressure of all liquids stored in this tank shall be less than 11 psia at actual storage conditions. [District Rule 4623]
4. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal roof shall be floating on the liquid surface except during initial fill and when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. Whenever the permittee intends to land the roof on it's legs, the permittee shall notify the APCO in writing at least five days prior to performing the work. [District Rule 4623]
5. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623]
6. The cumulative length of all gaps between the tank shell and the primary seal greater than 1/2 inch shall not exceed 10% of the circumference of the tank. [District Rule 4623]
7. The cumulative length of all primary seal gaps greater than 1/8 inch shall not exceed 30% of the circumference of the tank. [District Rule 4623]
8. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623]
9. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623]
10. The cumulative length of all gaps between the tank shell and the secondary seal, greater than 1/8 inch shall not exceed 5% of the tank circumference. [District Rule 4623]
11. The metallic shoe-type seal shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 18 inches above the stored liquid surface. [District Rule 4623]
12. The geometry of the metallic-shoe type seal shall be such that the maximum gap between the shoe and the tank shell shall be no greater than 3 inches for a length of at least 18 inches in the vertical plane above the liquid. [District Rule 4623]
13. There shall be no holes, tears, or openings in the secondary seal or in the primary seal envelope that surrounds the annular vapor space enclosed by the roof edge, seal fabric, and secondary seal. [District Rule 4623]
14. The secondary seal shall allow easy insertion of probes of up to 1 1/2 inches in width in order to measure gaps in the primary seal. [District Rule 4623]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623]
16. All openings in the roof used for sampling and gauging, except pressure-vacuum valves which shall be set to within 10% of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal or lid that shall be in a closed position at all times, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623]
17. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
18. Each opening in a non-contact internal floating roof, except for automatic bleeder vents (vacuum breaker vents) and rim space vents, shall provide a projection below the liquid surface. [District Rule 4623]
19. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [District Rule 4623]
20. Automatic bleeder vents shall be equipped with a gasket and shall be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [District Rule 4623]
21. Rim vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [District Rule 4623]
22. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The well shall have a slit fabric cover that covers at least 90% of the opening. The fabric cover must be impermeable. [District Rule 4623]
23. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. The fabric sleeve must be impermeable. [District Rule 4623]
24. The permittee shall visually inspect the internal floating roof, and its appurtenant parts, fittings, etc. and measure the gaps of the primary seal and/or secondary seal prior to filling the tank for newly constructed, repair, or rebuilt internal floating roof tanks. If holes, tears, or openings in the primary seal, the secondary seal, the seal fabric or defects in the internal floating roof or its appurtenant parts, components, fittings, etc., are found, they shall be repaired prior to filling the tank. [District Rule 4623]
25. The permittee shall visually inspect, through the manholes, roof hatches, or other openings on the fixed roof, the internal floating roof and its appurtenant parts, fittings, etc., and the primary seal and/or secondary seal at least once every 12 months after the tank is initially filled with an organic liquid. There should be no visible organic liquid on the roof, tank walls, or anywhere. Other than the gap criteria specified by this rule, no holes, tears, or other openings are allowed that would permit the escape of vapors. Any defects found are violations of this rule. [District Rule 4623]
26. The permittee shall conduct actual gap measurements of the primary seal and/or secondary seal at least once every 60 months. [District Rule 4623]
27. Permittee shall submit the reports of the floating roof tank inspections to the APCO within five calendar days after the completion of the inspection only for those tanks that failed to meet the applicable requirements of Rule 4623, Sections 5.2 through 5.5. The inspection report for tanks that have been determined to be in compliance with the requirements of Sections 5.2 through 5.5 need not be submitted to the APCO, but the inspection report shall be kept on-site and made available upon request by the APCO. The inspection report shall contain all necessary information to demonstrate compliance with the provisions of Rule 4623. [District Rule 4623]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

28. Permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Sections 5.3.1.3 and 5.4.3. The records shall include information on the true vapor pressure (TVP), API gravity, storage temperature, type of organic liquid stored in the tank, the purpose of landing the roof on its legs, the date of roof landing, duration the roof was on its legs, the level or height at which the tank roof was set to land on its legs, and the lowest liquid level in the tank. [District Rule 4623]
29. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-845-6-1

**EXPIRATION DATE:** 07/31/2013

**EQUIPMENT DESCRIPTION:**

LOADING RACK SERVED BY CARB-CERTIFIED HYDROTECH CARBON ADSORPTION/ABSORPTION VAPOR RECOVERY SYSTEM (N-845-22)

## 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. All vapors shall be vented to the vapor recovery system (N-845-22). [District Rule 4624]
3. The loading and vapor collection equipment shall be maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections [District Rule 4624]
4. The 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. [District Rule 4624]
5. The total gasoline throughput of the entire facility shall not exceed 450,000 gallons per day. [District Rule 2201]
6. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
7. A log of breakdowns shall include the dates and hours during which vapor control equipment is down and the gallons of product received in each tank and loaded out during the breakdown periods. The log shall be made available for District inspection. [District Rule 1100]
8. Records of daily gasoline throughput shall be maintained. Such records shall be retained on-site for a period of at least five years, and shall be made available for District inspection upon request. [District Rule 1070]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-845-10-0

**EXPIRATION DATE:** 07/31/2013

**EQUIPMENT DESCRIPTION:**

ONE 20,000 GALLON TRANSMIX STORAGE TANK SERVED BY CARB-CERTIFIED HYDROTECH CARBON ADSORPTION/ABSORPTION VAPOR RECOVERY SYSTEM (N-845-22)

## 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. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all VOCs from the storage tank, and a VOC control device. The vapor recovery system shall be APCO-approved and maintained in gas-tight condition. The VOC control device shall be either of the following: a vapor return or condensation system that connects to a gas pipeline distribution system, or an approved VOC destruction device that reduces the inlet VOC emissions by at least 95% by weight as determined by the test method specified in Section 6.4.7. [District Rule 4623]
3. All piping, valves, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 4623]
4. A gas-tight condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a gas-tight cover which shall be closed at all times except during gauging or sampling. [District Rule 4623]

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

San Joaquin Valley  
Air Pollution Control District

PERMIT UNIT: N-845-22-1

EXPIRATION DATE: 07/31/2013

**EQUIPMENT DESCRIPTION:**

HYDROTECH CARBON ADSORPTION/ABSORPTION VAPOR RECOVERY SYSTEM

**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. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
3. The total volatile organic compound (VOC) emissions from the vapor recovery system shall not exceed 0.08 pounds per 1,000 gallon of liquid throughput. [District Rule 4624]

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

Facility Name: TESORO LOGISTICS OPERATIONS LLC  
Location: 3003 NAVY DR, STOCKTON, CA 95208  
N-845-22-1 : Oct 10 2012 4:22PM -- BCH

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-845-23-0

**EXPIRATION DATE:** 07/31/2013

**EQUIPMENT DESCRIPTION:**

4,000 GALLON DIESEL LUBRICITY ADDITIVE STORAGE TANK

## **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. True vapor pressure of the liquid stored shall be less than 0.5 psia. [District Rule 2201]
3. The daily VOC emissions shall not exceed 0.5 lb/day. [District Rules 2201 and 4623]
4. The amount of additive unloaded into the tank shall not exceed 11,857 gallon/year. [District Rule 2201]
5. Daily and annual records of the amount of additive unloaded into the tank shall be maintained. . [District Rule 2201]
6. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

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

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# ATTACHMENT E

Stringency Comparison for District Rule 4601



**Stringency Comparison of District Rule 4601 Non-SIP Version (12/17/09) to Current SIP Version (10/31/01)**

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
2.0 Applicability	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures any architectural coating for use within the District.	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.	No change in the applicability, therefore, non-SIP version of rule is as stringent as SIP version.
4.0 Exemptions	<p>The provisions of this rule shall not apply to:</p> <p>4.1 Any architectural coating that is sold or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.2 Any architectural coating that is sold in a containers with a volume of one liter (1.057 quarts) or less.</p> <p>4.3 Any aerosol coating product.</p>	<p>4.1 The provisions of this rule shall not apply to:</p> <p>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.1.2 Any aerosol coating product.</p> <p>4.2 With the exception of Section 6.2, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</p>	The only change is to require reporting requirements as discussed in Section 6.2 of the non-SIP approved version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
5.0 Requirements	<b>Note: Section 5.0 requirements refer to Table of Standards, Table of Standards 1, and Table of Standards 2. These tables are included as Attachment X.</b>		
	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2, 5.3, 5.8 and 8.0, no person shall;</p> <p>5.1.1 manufacture, blend, or repackage for sale within the District;</p> <p>5.1.2 supply, sell, or offer for sale within the district;</p> <p>5.1.3 solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards, after the specified effective date in the Table of Standards.</p>	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 or the Table of Standards 2, after the specified effective date in the Table of Standards 1 or the Table of Standards 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p>	Sections 5.8 and 8.0 of the SIP version are not included in the non-SIP version. As discussed in corresponding sections the non-SIP version is more stringent. The Table of Standards and Table of Standards 1 have the same VOC limits. Table of Standard 2 is more stringent as discussed below. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
	<p>5.2 Most Restrictive VOC Limit: If anywhere on the container of any architectural coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed in the Table of Standards, then the most restrictive VOC content limit shall apply. This provision does not apply to the following coating categories:</p> <p>5.2.1 Lacquer coatings (including lacquer sanding sealers)</p> <p>5.2.2 Metallic pigmented coatings</p> <p>5.2.3 Shellacs</p> <p>5.2.4 Fire-retardant coatings</p> <p>5.2.5 Pretreatment wash primers</p> <p>5.2.6 Industrial maintenance coatings</p> <p>5.2.7 Low-solids coatings</p>	<p>5.2 Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2.</p> <p>5.2.1 Effective until December 31, 2010, with the exception of the specialty coating categories specified in Section 5.2.3:1 through 5.2.3.15, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 1, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.2 Effective on and after January 1, 2011, with the exception of the</p>	The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>5.2.8 Wood preservatives            5.2.9 High temperature coatings            5.2.10 Temperature-indicator safety coatings            5.2.11 Antenna coatings            5.2.12 Antifouling coatings            5.2.13 Flow coatings            5.2.14 Bituminous roof primers            5.2.15 Specialty primers, sealers and undercoaters</p>	<p>specialty coating categories specified in Sections 5.2.3.2, 5.2.3.3, 5.2.3.5 through 5.2.3.9, and 5.2.3.14 through 5.2.3.18, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 2, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.3 This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <p>5.2.3.1 Lacquer coatings (including lacquer sanding sealers)            5.2.3.2 Metallic pigmented coatings            5.2.3.3 Shellacs            5.2.3.4 Fire-retardant coatings            5.2.3.5 Pretreatment wash primers            5.2.3.6 Industrial maintenance coatings            5.2.3.7 Low-solids coatings            5.2.3.8 Wood preservatives            5.2.3.9 High temperature coatings            5.2.3.10 Temperature-indicator safety coatings            5.2.3.11 Antenna coatings            5.2.3.12 Antifouling coatings            5.2.3.13 Flow coatings            5.2.3.14 Bituminous roof primers            5.2.3.15 Specialty primers, sealers and undercoaters            5.2.3.16 Aluminum roof coatings            5.2.3.17 Zinc-rich primers            5.2.3.18 Wood Coatings</p>	
	<p>5.3 Sell-Through of Coatings:            5.3.1 A coating manufactured prior to the January 1, 2003 or January 1, 2004 effective date specified for that coating in the Table of Standards may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.            5.3.2 A coating included in an approved Averaging Program that does not comply with the specified limit in the</p>	<p>5.3 Sell-Through of Coatings:            A coating manufactured prior to the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Section 5.3.2 was removed. It is no longer applicable in the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Table of Standards may be sold, supplied, or offered for sale for up to three years after the end of the compliance period specified in the approved Averaging Program. In addition, such a coating may be applied at any time, both during and after the compliance period. This Section 5.3.2 does not apply to any coating that does not display on the container either the statement: "This product is subject to architectural coatings averaging provisions in California" or a substitute symbol specified by the Executive Officer of the California Air Resources Board (ARB). This Section 5.3.2 shall remain in effect until January 1, 2008.</p>		
	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</p>
	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards.</p>	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.6 Rust Preventative Coatings: Effective January 1, 2004, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards.</p>	<p>5.6 Rust Preventative Coatings: Effective through December 31, 2010, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards 1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.7 Coatings Not Listed in the Table of Standards: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards, the VOC content limit shall be determined by classifying the coating as a flat coating or a nonflat coating, based on its gloss, as defined in Sections 3.21, 3.36 and 3.37 and the corresponding flat or nonflat VOC limit shall apply.</p>	<p>5.7 Coatings Not Listed in the Table of Standards 1 or the Table of Standards 2: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards 1 or the Table of Standards 2, the VOC content limit shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat – High Gloss coating, based on its gloss, and the corresponding Flat, Nonflat, or Nonflat – High Gloss VOC limit in the Table of Standards 1 or the Table of Standards 2 shall apply.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.8 Lacquers: Notwithstanding the provisions of Section 3.1, a person or facility may add up to 10 percent by volume of VOC to a lacquer to avoid blushing of the finish during days with relative humidity greater</p>	<p>---</p>	<p>This section has been removed. The operation is required to meet the lacquer VOC limit regardless of</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>than 70 percent and temperature below 65°F, at the time of application, provided that the coating contains acetone and no more than 550 grams of VOC per liter of coating, less water and exempt compounds, prior to the addition of VOC.</p>		<p>temperature and humidity. Therefore, non-SIP version of rule is as stringent as SIP version</p>
	<p>5.9 Averaging Compliance Option: On or after January 1, 2003, in lieu of compliance with the specified limits in The Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; bituminous roof coatings; rust preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in Section 8.0, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section 5.9 and Section 8.0 shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.</p>		<p>This section is removed from the non-SIP version, it is no longer applicable. Therefore, non-SIP version of rule is as stringent as SIP version.</p>
		<p>5.8 Prior to January 1, 2011, any coating that meets a definition in Section 3.0 for a coating category listed in the Table of Standards 2 and complies with the applicable VOC limit in the Table of Standards 2 and with Sections 5.2 and 6.1 (including those provision of Section 6.1 otherwise effective on January 1, 2011) shall be considered in compliance with this rule.</p>	<p>Table of Standards 2 is more stringent than the VOC limits of Table of Standards in the SIP-Approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</p>
<p>Table of Standards (See Attachment X for Table)</p>		<p>Table of Standards 1 (Effective through 12/31/10) (See Attachment X for Table)</p>	<p>The non-SIP rule requirements are the same as the Table of Standards in the SIP approved rule, except Table of Standards 1 expires at which time Table of Standards 2 is in effect. As discussed below these standards are more stringent. Therefore, non-SIP version of rule is as stringent as SIP version.</p>
		<p>Table of Standards 2 (Effective on and after 1/1/11) (See Attachment X for Table)</p>	<p>The requirements of Table of Standards 2 are more stringent than the Table of Standards in the SIP rule. Therefore, non-SIP version of rule is as stringent as SIP version.</p>
<p>6.0 Administrative Requirements</p>	<p>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections</p>	<p>6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the</p>	<p>The non-SIP approved rule contain sections listed in the SIP rule plus</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.1.1 through 6.1.9 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display either the maximum or actual VOC content of the coating, as supplied, including the maximum thinning as recommended by the manufacturer. VOC content shall be displayed in grams of VOC per liter of coating. VOC content displayed shall be calculated using product formulation data, or shall be determined using the test methods in Section</p> <p>6.3.1. The equations in Sections 3.25 or 3.26, as appropriate, shall be used to calculate VOC content.</p> <p>6.1.4 Industrial Maintenance Coatings: In addition to the information specified in Sections 6.1.1, 6.1.2 and 6.1.3, each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.4.1 through 6.1.4.3.</p> <p>6.1.4.1 "For industrial use only"</p> <p>6.1.4.2 "For professional use only"</p> <p>6.1.4.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.5 Clear Brushing Lacquers: Effective January 1, 2003, the labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed."</p> <p>6.1.6 Rust Preventative Coatings: Effective January 1, 2003, the labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only"</p> <p>6.1.7 Specialty Primers, Sealers and Undercoaters: Effective January 1, 2003, the labels of all specialty primers, sealers and undercoaters shall prominently</p>	<p>information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p> <p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.1.4 Faux Finishing Coatings: Effective January 1, 2011, the labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part of a Faux Finishing coating system".</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of</p>	<p>additional requirements not found in the SIP version. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

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	<p>display one or more of the descriptions listed in Section</p> <p>6.1.7.1 through 6.1.7.5.</p> <p>6.1.7.1 For blocking stains.</p> <p>6.1.7.2 For fire-damaged substrates.</p> <p>6.1.7.3 For smoke-damaged substrates.</p> <p>6.1.7.4 For water-damaged substrates.</p> <p>6.1.7.5 For excessively chalky substrates.</p> <p>6.1.8 Quick Dry Enamels: Effective January 1, 2003, the labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time.</p> <p>6.1.9 Non-flat – High Gloss Coatings: Effective January 1, 2003, the labels of all non-flat – high gloss coatings shall prominently display the words "High Gloss".</p>	<p>the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 "For Industrial use only"</p> <p>6.1.5.2 "For professional use only"</p> <p>6.1.5.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.6 Clear Brushing Lacquers: The labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed." (Category deleted effective January 1, 2011.)</p> <p>6.1.7 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only".</p> <p>6.1.8 Specialty Primers, Sealers and Undercoaters: Effective until December 31, 2010, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.8.1 through 6.1.8.5. Effective on and after January 1, 2011, the labels of all specialty primers, sealers, and undercoaters shall prominently display one or more of the descriptions listed in Sections 6.1.8.1 through 6.1.8.3. On and after January 1, 2011, Sections 6.1.8.4 and 6.1.8.5 will be no longer effective.</p> <p>6.1.8.1 For fire-damaged substrates.</p> <p>6.1.8.2 For smoke-damaged substrates.</p> <p>6.1.8.3 For water-damaged substrates.</p> <p>6.1.8.4 For excessively chalky substrates.</p> <p>6.1.8.5 For blocking stains.</p> <p>6.1.9 Quick Dry Enamels: The labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time. (Category deleted effective January 1, 2011.)</p> <p>6.1.10 Reactive Penetrating Sealers: Effective January 1, 2011, the labels of all Reactive Penetrating Sealers shall prominently display the statement "Reactive Penetrating Sealer."</p> <p>6.1.11 Stone Consolidants: Effective January 1, 2011, the labels of all Stone Consolidants shall prominently display the statement "Stone Consolidant - For Professional Use Only."</p> <p>6.1.12 Nonflat– High Gloss Coatings: The labels of all Nonflat – high gloss coatings shall prominently display the words "High Gloss."</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>6.1.13 Wood Coatings: Effective January 1, 2011, the labels of all Wood Coatings shall prominently display the statement "For Wood Substrates Only."</p> <p>6.1.14 Zinc Rich Primers: Effective January 1, 2011, the labels of all Zinc Rich Primers shall prominently display one or more of the following descriptions listed in Section 6.1.14.1 through 6.1.14.3.</p> <p>6.1.14.1 "For industrial use only"</p> <p>6.1.14.2 "For professional use only"</p> <p>6.1.14.3 "Not for residential use" or "Not intended for residential use"</p>	
	<p>6.2 Reporting Requirements</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p>	<p>6.2 Reporting Requirements</p> <p>The reporting requirements specified in Sections 6.2.1 through 6.2.6 shall apply until December 31, 2010.</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an</p>	<p>Until December 31, 2010 both versions of the rule have the same reporting requirements. After that date the non-SIP approved rule includes very specific information to be kept and is required for all architectural coatings. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.2.4.2 the product category listed in the Table of Standards to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p>	<p>annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p> <p>6.2.4.2 the product category listed in the Table of Standards 1 or the Table of Standards 2 to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate state sales.</p> <p>6.2.7 Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 to 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17.</p>	



Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.7.1 through 6.2.7.14:</p> <ul style="list-style-type: none"> <li>6.2.7.1 the name and mailing address of the manufacturer;</li> <li>6.2.7.2 the name, address and telephone number of a contact person;</li> <li>6.2.7.3 the name of the coating product as it appears on the label and the applicable coating category;</li> <li>6.2.7.4 whether the product is marketed for interior or exterior use or both;</li> <li>6.2.7.5 the number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);</li> <li>6.2.7.6 the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</li> <li>6.2.7.7 the names and CAS numbers of the VOC constituents in the product;</li> <li>6.2.7.8 the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</li> <li>6.2.7.9 whether the product is marketed as solvent-borne, waterborne, or 100% solids;</li> <li>6.2.7.10 description of resin or binder in the product;</li> <li>6.2.7.11 whether the coating is a single-component or multi-component product;</li> <li>6.2.7.12 the density of the product in pounds per gallon;</li> <li>6.2.7.13 the percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</li> <li>6.2.7.14 the percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</li> </ul>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.3 Test Methods</p> <p>6.3.1 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.26 and 3.27, the reference method for VOC content is U.S. EPA Method 24, except as provided in Sections 6.3.2 and 6.3.15. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996), incorporated by reference in Section 6.3.14. The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised August 1996), incorporated by reference in Section 6.3.12. To determine the VOC content of a coating, the manufacturer may use U.S. EPA Method 24, or an alternative method as provided in Section 6.3.2, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of a Method 24 test and any other means for determining VOC content, the Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.2. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct a Method 24 analysis.</p> <p>6.3.2 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.1, after review and approved in writing by the staffs of the District, the ARB and the U.S. EPA, may also be used. 6.3.3 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of U.S. EPA Method 24 (40 CFR 59, subpart D, Appendix A), incorporated by reference in Section 6.3.15. This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.4 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM Designation E 84-99, "Standard Test Method for Surface Burning Characteristics of Building Materials"(see Section 3, Fire-Retardant Coating).</p> <p>6.3.5 Fire Resistance Rating: The fire</p>	<p>6.3 Test Methods</p> <p>The test methods listed below shall be used to demonstrate compliance with this rule. Alternate equivalent test methods may be used provided the test methods have been approved by the APCO and EPA.</p> <p>6.3.1 Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in the Table of Standards 1 or the Table of Standards 2, the VOC content of a coating shall be determined as defined in Section 3.77, 3.78, or 3.79 as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC Content must be calculated including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content must be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOC during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.3.2 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.77 and 3.79, the reference method for VOC content is EPA Method 24, except as provided in Sections 6.3.3 and 6.3.16. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1993), BAAQMD Method 43 (Revised 1996), or BAAQMD Method 41 (Revised 1995), as applicable. To determine the VOC content of a coating, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.3, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24</p>	<p>The non-SIP version includes all the requirements of the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>resistance rating of a fire-resistive coating shall be determined by ASTM Designation E 119-98, "Standard Test Methods for Fire Tests of Building Construction Materials"(see Section 3, Fire-Resistive Coating).</p> <p>6.3.6 Gloss Determination: The gloss of a coating shall be determined by ASTM Designation D 523-89 (1999), "Standard Test Method for Specular Gloss"(see Section 3, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.7 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Metallic Pigmented Coating).</p> <p>6.3.8 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM Designation D 1613-96, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products"(see Section 3, Pre-Treatment Wash Primer).</p> <p>6.3.9 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM Designation D 1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quickdry enamel coating shall be determined by the Mechanical Test Method of ASTM Designation D 1640-95.</p> <p>6.3.10 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM Designation D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater).</p> <p>6.3.11 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.12 Exempt Compounds—</p>	<p>test results will govern, except when an alternative method is approved as specified in Section 6.3.3. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct an EPA Method 24 analysis.</p> <p>6.3.3 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.2 4, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</p> <p>6.3.4 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Method 24 (40 CFR 59, subpart D, Appendix A). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.5 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM E84-07, "Standard Test Method for Surface Burning Characteristics of Building Materials" (see Section 3.0, Fire-Retardant Coating).</p> <p>6.3.6 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM E119-07, "Standard Test Methods for Fire Tests of Building Construction Materials" (see Section 3.0, Fire-Resistive Coating).</p> <p>6.3.7 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-89 (1999), "Standard Test Method for Specular Gloss" (see Section 3.0, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.8 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</p> <p>6.3.9 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM D1613-06, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products" (see Section 3.0, Pre-Treatment Wash Primer).</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.13 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1996), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.14 VOC Content of Coatings: The VOC content of a coating shall be determined by U.S. EPA Method 24 as it exists in appendix A of 40 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.1).</p> <p>6.3.15 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 6.3.1).</p> <p>6.3.16 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998) (see Section 6.3.3).</p>	<p>6.3.10 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM D1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3.0, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quick-dry enamel coating shall be determined by the Mechanical Test Method of ASTM D1640-95. (Category deleted effective January 1, 2011.)</p> <p>6.3.11 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films" (see Section 3, Specialty Primer, Sealer and Undercoater). (Category deleted effective January 1, 2011.)</p> <p>6.3.12 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.13 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.14 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1993), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.15 VOC Content of Coatings: The VOC content of a coating shall be determined by EPA Method 24 as it exists in appendix A of 40 <i>Code of</i></p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p><i>Federal Regulations (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.2).</i></p> <p>6.3.16 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples.</i></p> <p>6.3.17 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998).</p> <p>6.3.18 Hydrostatic Pressure for Basement Specialty Coatings: The hydrostatic pressure resistance for basement specialty coatings shall be analyzed using ASTM D7088-04, "Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry".</p> <p>6.3.19 Tub and Tile Refinish Coating Adhesion: The adhesion of tub and tile coating shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-02, "Standard Test Methods for Measuring Adhesion by Tape Test".</p> <p>6.3.20 Tub and Tile Refinish Coating Hardness: The hardness of tub and tile refinish coating shall be determined by ASTM D3363-05, "Standard Test Method for Film Hardness by Pencil Test".</p> <p>6.3.21 Tub and Tile Refinish Coating Abrasion Resistance: Abrasion resistance of tub and tile refinish coating shall be analyzed by ASTM D4060-07, "Standard Test Methods for Abrasion Resistance of Organic Coatings by the Taber Abraser".</p> <p>6.3.22 Tub and Tile Refinish Coating Water Resistance: Water resistance of tub and tile refinish coatings shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02e1, "Standard Test Method</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>for Evaluating Degree of Blistering of Paints".</p> <p>6.3.23 Waterproofing Membrane: Waterproofing membrane shall be tested by ASTM C836-06, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course".</p> <p>6.3.24 Mold and Mildew Growth for Basement Specialty Coatings: Mold and mildew growth resistance for basement specialty coatings shall be determined by ASTM D3273-00, "Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber" and ASTM D3274-95, "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Microbial (Fungal or Algal) Growth or Soil and Dirt Accumulation".</p> <p>6.3.25 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67-07, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97-02, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-06, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units".</p> <p>6.3.26 Reactive Penetrating Sealer Water Vapor Transmission: Reactive penetrating sealer water vapor transmission shall be analyzed ASTM E96/E96M-05, "Standard Test Method for Water Vapor Transmission of Materials".</p> <p>6.3.27 Reactive Penetrating Sealer - Chloride Screening Applications: Reactive penetrating sealers shall be analyzed by National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures".</p> <p>6.3.28 Stone Consolidants: Stone consolidants shall be tested using ASTM E2167-01, "Standard Guide for Selection and Use of Stone Consolidants".</p>	
7.0 Compliance Schedule	Persons subject to this rule shall be in compliance with this rule by October 31, 2001.	Persons subject to this rule shall be in compliance with this rule by the dates specified within the rule.	No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.
8.0 Averaging Compliance Option	8.1 On or after January 1, 2003, in lieu of compliance with the specified limits in the Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; rust		No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in this Section, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.</p> <p>Per Section 8.1, averaging is no longer applicable. Therefore, Section 8.2 through 8.14 are not listed.</p>		

District Rule 4601 was amended (12/17/2009). As analyzed, each amended section of the non-SIP version of the rule is at least as stringent as, or more stringent than the corresponding section of the SIP version of the rule. Therefore, it is concluded that overall the non-SIP version of the rule is more stringent than the SIP version of the rule.

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# ATTACHMENT F

Public comments and District responses

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Comments received on  
September 10, 2012  
and  
District's Responses

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RECEIVED

SEP 10 2012

SJVAPCD  
NORTHERN REGION

VIA UPS MAIL

September 7, 2012



Tesoro Logistics Operations LLC  
19100 Ridgewood Parkway  
San Antonio, TX 78259  
210 626 6000 Phone

Mr. David Warner  
Director of Permit Services  
San Joaquin Valley Air Pollution Control District  
4800 Enterprise Way  
Modesto, California 95356-8718

RE: **Comments on Draft Initial Title V Permit N-845 Issued August 3, 2012**  
**Project Number: N-1110694**  
Tesoro Logistics Operations LLC – Stockton, CA Terminal

Dear Mr. Warner:

On April 5, 2011, Tesoro Logistics Operations LLC (Tesoro) submitted an Initial Title V Operating Permit Application to the San Joaquin Valley Air Pollution Control District (SJVAPCD) for a petroleum bulk terminal located in Stockton, CA (Stockton Terminal). SJVAPCD deemed the application complete on April 15, 2011. On August 3, 2012, SJVAPCD issued the draft Initial Title V Operating Permit and Initial Title V Engineering Evaluation. In this letter, Tesoro submits comments on both the conditions presented in Draft Title V Permit N-845 and information contained in the Initial Title V Engineering Evaluation for SJVAPCD's review.

### **GENERAL COMMENTS: PROPOSED INITIAL TITLE V ENGINEERING EVALUATION AND DRAFT INITIAL TITLE V OPERATING PERMIT**

1. Tesoro requests the removal of all references to New Source Performance Standard (NSPS) Subpart XX (40 CFR 60.500 – 60.506) in the Draft Initial Title V Operating Permit. As explained in Section 4.4.5 of the Initial Title V Permit Application, NSPS Subpart XX applies to the total of all the loading racks at a bulk gasoline terminal which deliver liquid product into gasoline tank trucks for which the **construction or modification commenced after December 17, 1980**. Any replacement of components of an existing loading rack that commenced before August 18, 1983 in order to comply with any emission standard adopted by a State or political subdivision are not considered as reconstruction. The loading racks at the Stockton Terminal were constructed prior to December 17, 1980 and have not been modified since December 17, 1980.<sup>1</sup> As such, the Stockton Terminal is not currently subject to NSPS Subpart XX. Further, as the Authority to Construct (ATC) N-845-6-3 has not yet been implemented, references to 40 CFR Subpart XX do not apply at this time. Tesoro will follow the Title V Operating Permit Application Procedures stipulated under SJVAPCD Rule 2520 to incorporate the relevant NSPS Subpart XX requirements in the Title V Operating Permit at the appropriate time.

Please also update the Initial Title V Engineering Evaluation, Section IX.B.24, NSPS Subpart XX, *Standards of Performance for Bulk Gasoline Terminals* to address the inapplicability of NSPS Subpart XX to the loading racks at the Stockton Terminal.

2. Tesoro requests that SJVAPCD update the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart BBBBBB (6B) loading rack requirements in the Draft Initial Title V Operating Permit. As explained in

<sup>1</sup> Although there have been physical changes at the loading rack since December 17, 1980, none of the physical changes have resulted in a short term increase of VOC emissions. As such, the loading rack is not considered a modified unit under NSPS Subpart XX.

Section 4.6.3 of the Initial Title V Permit Application, per 40 CFR 63.11088, the loading rack at the Stockton Terminal must meet the emission limits and management practices stipulated in Table 2 of NESHAP Subpart 6B. Under Table 2, there are different requirements depending upon the daily throughput at the loading rack. If the gasoline throughput is greater than 250,000 gallons per day, stricter requirements are stipulated. Per Table 2 of NESHAP Subpart 6B, the daily gasoline throughput is calculated "by summing the current day's throughput, plus the throughput for the previous 364 days, and then dividing that sum by 365." The Stockton Terminal exceeded the 250,000 gallon per day threshold in August 2010. Per 40 CFR 63.11083(c), the terminal has three years to come into compliance with the requirements of NESHAP Subpart 6B at the increased level of gasoline throughput. The loading rack at the Stockton Terminal will meet the stricter requirements stipulated in Table 2 of NESHAP Subpart 6B by August 2013. Therefore, the requirements that are solely required for loading racks that have a gasoline throughput greater than 250,000 gallons per day should be removed from the Draft Initial Title V Operating Permit (e.g., the continuous emissions monitoring system [CEMS]). SJVAPCD should update the permit conditions to list the appropriate requirements for loading racks with a throughput less than or equal to 250,000 gallons per day, as provided in NESHAP Subpart 6B.

Please also update the Initial Title V Engineering Evaluation, Section IX.B.26, 40 CFR Part 63 Subpart 6B, *Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities* to address the appropriate NESHAP Subpart 6B loading rack requirements to the Stockton Terminal.

3. Tesoro requests the removal of all references to 40 CFR Part 64, *Compliance Assurance Monitoring* in the Draft Initial Title V Operating Permit. As explained in Section 4.7 of the Initial Title V Permit Application, under 40 CFR Part 64, the Compliance Assurance Monitoring (CAM) Regulations, facilities are required to prepare and submit monitoring plans for certain emission units with **certain** Title V applications. Tesoro agrees that the loading rack and vapor recovery system (VRS) are subject to the CAM Regulations, but disagrees that the Initial Title V Operating Permit is the appropriate permitting mechanism to require a CAM Plan.

40 CFR 64.5(a) states that facilities with "large pollutant-specific emissions units" must submit a CAM Plan with an Initial or Significant Title V Operating Permit Application. A "large pollutant specific emissions unit" is one that emit greater than 100 percent of the amount, in tons per year (taking into account control devices), required for a source to be classified as a major source. The VRS stack does not emit more than 10 tpy. As such, the loading rack and VRS do not meet the definition of a "large pollutant-specific emission unit." 40 CFR 64.5(b) states that all other emission sources must submit a CAM Plan as part of the Title V Operating Permit Renewal Application. As such, Tesoro is only required to submit a CAM Plan for the loading rack and VRS at the time of the Title V Permit **Renewal** Application – not in the Initial Title V Operating Permit Application.

Please also update the Initial Title V Engineering Evaluation, Section IX.B.27, 40 CFR Part 64, *Compliance Assurance Monitoring (CAM)* to address the inapplicability of submitting a CAM Plan as part of an Initial Title V Operating Permit Application.

## COMMENTS ON PROPOSED INITIAL TITLE V ENGINEERING EVALUATION

1. Initial Title V Engineering Evaluation, Page 1. Please change the Responsible Official and Title to be as follows:  
*Responsible Official: Michael McGann Rick D. Weyen*  
*Title: Vice President, Pipelines and Terminals Vice President, Operations*

2. Initial Title V Engineering Evaluation, Section IX.B.22. To correctly quote 40 CFR Part 60, Subpart Ka, please revise the text to read as follows:  
*This subpart applies to storage vessels with a capacity of less greater than 151,416 liters (equivalent to 40,000 gallons)...*

Additionally, the fourth column of the table is titled "*Capacity < 400,000 gallons.*" It is unclear if SJVAPCD intended this number to be 40,000 gallons (for basic applicability to NSPS Subpart Ka) or 420,000 gallons (for petroleum or condensate stored, processed, or treated prior to custody transfer). Please update the title accordingly.

3. Initial Title V Engineering Evaluation, Section IX.B.29. The current text duplicates text under Title V Application Review Section IX.B.28 regarding 40 CFR Part 82, Subpart B, *Protection of Stratospheric Ozone, Servicing of Motor Vehicle Air Conditioners*. If this section was meant to reference Subpart F, to which Permit Number N-845-0-1 Condition 27 applies, please adjust the text accordingly.
4. Initial Title V Engineering Evaluation, Section X. To be consistent with the Attachment name, please revise the text to read as follows:  
*See Attachment A- Draft Renewed Title V Operating Permit Draft Initial Title V Operating Permit*
5. There are minor grammatical errors throughout the Initial Title V Engineering Evaluation. A few examples are listed below:
  - a. "*Section 9.9 requires the permit specify that...*" - Page 12
  - b. "*See detail discussions in the following sections*" - Page 14.
  - c. "*These internal floating roof storage tanks do not equipped*" - Page 19.
  - d. "*... facility with daily transfer throughput more than 20,000 gallons of organic liquids...*" - Page 22.
  - e. "*This subpart applies to storage vessels: a) has a capacity greater than..., b) has a capacity greater than...*" - Page 27
  - f. "*Detail discussions are follows*" - Pages 27, 28, and 30.
  - g. "*This bulk gasoline terminal has only one loading rack which deliver liquid...*" - Page 34
  - h. "*... Title VI of the CAA (Stratospheric Ozone0 that apply...*" - Page 53

### COMMENTS ON DRAFT PERMIT N-845-0-1

1. Draft Initial Title V Operating Permit N-845-0-1, Condition 10. This condition states that reports shall contain information from "*required monitoring*" at least every six months. However, when reviewing the equipment-specific permits, the monitoring data to include in the semi-annual report is not specified. Please add language in the permit to clearly specify what information SJVAPCD would like to see in the Condition 10 reports.
2. Draft Initial Title V Operating Permit N-845-0-1, Conditions 10 and 40. Condition 10 requires that Tesoro submit monitoring reports every six months. Condition 40 states that a "*Report of Required Monitoring*" is due within 30 days after the end of the reporting period. Please confirm that the Condition 10 report is the same as the "*Report of Required Monitoring.*" If this is the case, please use the same report title in Condition 10 for consistency.
3. Draft Initial Title V Operating Permit N-845-0-1, Conditions 36 and 40. Condition 36 requires that Tesoro submit certifications of compliance annually. Condition 40 states that a "*Compliance Certification Report*" is due within 30 days after the end of the reporting period. Please confirm that the Condition 36 report is the same as the "*Compliance Certification Report.*" If this is the case, please use the same report title in Condition 36 for consistency.
4. Draft Initial Title V Operating Permit N-845-0-1, Conditions 41 and 42. To be consistent with the SJVAPCD Facility-wide Umbrella General Permit Template, please add the following conditions:

***41. 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]***

**42. 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 (12/1709) [sic]; 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]**

### **COMMENTS ON DRAFT PERMIT N-845-6-2**

1. Draft Initial Title V Operating Permit N-845-6-2, Condition 2. It seems that Condition 7 encompasses all requirements that Condition 2 specifies. Please remove Condition 2 from this permit to eliminate redundancy.

### **COMMENTS ON DRAFT PERMIT N-845-10-1**

2. Draft Initial Title V Operating Permit N-845-6-2, Description. Please update the Equipment Description to the following:  
*One 20,000 gallon vertical fixed roof volatile organic liquid storage tank (TK-420) served by a carbon adsorption/vapor recovery system (N-845-22).*

### **COMMENTS ON DRAFT PERMIT N-845-22-2**

#### **Conditions**

1. Draft Initial Title V Operating Permit N-845-22-2, Condition 1. Condition 1 states the *"VOC removal efficiency shall be at least 95%"*. This condition is not required in the current Permit to Operate (PTO) N-845-22-1, and should be removed from the Draft Initial Title V Operating Permit.
2. Draft Initial Title V Operating Permit N-845-22-2, Condition 2. It seems that Condition 6 encompasses all requirements that Condition 2 specifies. Please remove Condition 2 from this permit to eliminate redundancy.
3. Draft Initial Title V Operating Permit N-845-22-2, Condition 14. This condition should be removed as the source testing methods described do not help to demonstrate compliance with the limit set forth in the PTO that *"total volatile organic compound (VOC) emissions from the vapor recovery system shall not exceed 0.08 pounds per 1,000 gallon of liquid throughput"*. Additionally, NSPS Subpart XX does not currently apply to the loading rack and VRS. Further, Draft Title V Permit N-845-22-2, Condition 15 is sufficient in describing the source testing methods to comply with the 0.08 pound per 1,000 gallon of liquid throughout.
4. Draft Initial Title V Operating Permit N-845-22-2, Condition 21. This condition requires source testing to establish the VOC removal efficiency. As there should not be a permit condition requiring minimum control efficiency, there is no need to require a source test to establish what the VOC removal efficiency is for the VRS.
5. Draft Initial Title V Operating Permit N-845-22-2, Condition 23. This condition should be removed as a continuous emission monitoring system (CEMS) should not be required until August 2013 per NESHAP Subpart 6B (See #2 under "General Comments: Proposed Initial Title V Engineering Evaluation and Draft Initial Title V Operating Permit" in this letter). As such, there is no need to have a permit condition allowing an authorized representative to inspect the required monitoring devices, as there will be no such required monitoring device.

Mr. Warner - Page 5  
September 7, 2012

Tesoro appreciates SJVAPCD's review of the comments contained herein. If you have any questions, please contact me at (210) 626-6327 or Ms. Melissa Hillman (Trinity) at (510) 285-6351.

Sincerely,

A handwritten signature in cursive script that reads "Brooks Neighbors".

Mr. Brooks Neighbors  
Environmental Compliance Specialist  
Tesoro Logistics GP LLC

cc: Ms. Melissa Hillman, Trinity (Oakland, CA)  
Mr. Wai-Man So, SJVAPCD (Modesto, CA)  
Mr. Rupi Gill, SJVAPCD (Modesto, CA)  
Mr. John Walker, Tesoro (Stockton, CA)

## Applicant's Comments on Proposed Initial Title V Engineering Evaluation and Initial Title V Operating Permit:

On September 10, 2012, the District received comments from the applicant on the proposed Initial Title V Engineering Evaluation and Draft Initial Title V Operating Permit. These comments and the District responses to each comment are given in the following section.

### General Comments: Proposed Initial Title V Engineering Evaluation and Draft Initial Title V Operating Permit

#### **Comment #1**

Tesoro requests the removal of all references to New Source Performance Standard (NSPS) Subpart XX (40 CFR 60.500 – 60.506) in the Draft Initial Title V Operating Permit. As explained in Section 4.4.5 of the Initial Title V Permit Application, NSPS Subpart XX applies to the total of all the loading racks at a bulk gasoline terminal which deliver liquid product into gasoline tank trucks for which the **construction or modification commenced after December 17, 1980**. Any replacement of components of an existing loading rack that commenced before August 18, 1983 in order to comply with any emission standard adopted by a State or political subdivision are not considered as reconstruction. The loading racks at the Stockton Terminal were constructed prior to December 17, 1980 and have not been modified since December 17, 1980.<sup>1</sup> As such, the Stockton Terminal is not currently subject to NSPS Subpart XX. Further, as the Authority to Construct (ATC) N-845-6-3 has not yet been implemented, references to 40 CFR Subpart XX do not apply at this time. Tesoro will follow the Title V Operating Permit Application Procedures stipulated under SJVAPCD Rule 2520 to incorporate the relevant NSPS Subpart XX requirements in the Title V Operating Permit at the appropriate time.

Please also update the Initial Title V Engineering Evaluation, Section IX.B.24, NSPS Subpart XX, *Standards of Performance for Bulk Gasoline Terminals* to address the inapplicability of NSPS Subpart XX to the loading racks at the Stockton Terminal.

#### **Response**

40 CFR Part 60, Subpart A §60.2 define **Construction** as, fabrication, erection, or installation of an affected facility.

40 CFR Part 60, Subpart A §60.2 define **Modification** as, any physical change in, or

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<sup>1</sup> Although there have been physical changes at the loading rack since December 17, 1980, none of the physical changes have resulted in a short term increase of VOC emissions. As such, the loading rack is not considered a modified unit under NSPS Subpart XX.

change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted.

According to the provided information, the loading rack at this facility was constructed prior to December 17, 1980.

However, Tesoro submitted an Authority to Construct application to increase the daily throughput limit of the loading rack from 250,000 gallons to 450,000 gallons under project N-1001299 on December 10, 2000. The ATC N-845-6-1 for the proposed modification was implemented on October 1, 2001, and this modification resulted in an increase of VOC emissions. Therefore, the loading rack is currently subject to the requirements of NSPS Subpart XX, *Standards of Performance for Bulk Gasoline Terminals*.

## **Comment #2**

Tesoro requests that SJVAPCD update the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart BBBB (6B) loading rack requirements in the Draft Initial Title V Operating Permit. As explained in Section 4.6.3 of the Initial Title V Permit Application, per 40 CFR 63.11088, the loading rack at the Stockton Terminal must meet the emission limits and management practices stipulated in Table 2 of NESHAP Subpart 6B. Under Table 2, there are different requirements depending upon the daily throughput at the loading rack. If the gasoline throughput is greater than 250,000 gallons per day, stricter requirements are stipulated. Per Table 2 of NESHAP Subpart 6B, the daily gasoline throughput is calculated "by summing the current day's throughput, plus the throughput for the previous 364 days, and then dividing that sum by 365." The Stockton Terminal exceeded the 250,000 gallon per day threshold in August 2010. Per 40 CFR 63.11083(c), the terminal has three years to come into compliance with the requirements of NESHAP Subpart 6B at the increased level of gasoline throughput. The loading rack at the Stockton Terminal will meet the stricter requirements stipulated in Table 2 of NESHAP Subpart 6B by August 2013. Therefore, the requirements that are solely required for loading racks that have a gasoline throughput greater than 250,000 gallons per day should be removed from the Draft Initial Title V Operating Permit (e.g., the continuous emissions monitoring system [CEMS]). SJVAPCD should update the permit conditions to list the appropriate requirements for loading racks with a throughput less than or equal to 250,000 gallons per day, as provided in NESHAP Subpart 6B.

Please also update the Initial Title V Engineering Evaluation, Section IX.B.26, 40 CFR Part 63 Subpart 6B, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities to address the appropriate NESHAP Subpart 6B loading rack requirements to the Stockton Terminal.



## Response

The current permit to operate (PTO) N-845-6-1 for the loading rack has a daily gasoline throughput limit of 450,000 gallons.

In addition, according to the past five years emissions inventory records, 2007 thru 2011 provided by the facility, the daily average gasoline throughput of the loading rack is greater than 250,000 gallons since 2007.

The following table summarizes the provided annual throughput records, the daily average throughput, and the applicability of NESHAP Subpart 6B Table 2.1.

Year	Provided Annual Throughput (gal/year)	Day/year	Daily Average Throughput (gal/day)	> 250,000 (gal/day)	Applicability of NESHAP Subpart 6B Table 2.1
2007	117,442,520	365	321,760	Yes	Yes
2008	108,408,000	365	297,008	Yes	Yes
2009	117,442,500	365	321,760	Yes	Yes
2010	117,442,500	365	321,760	Yes	Yes
2011	141,639,920	365	388,055	Yes	Yes

Therefore, the loading rack is currently subject to the requirements of NESHAP Subpart 6B, *Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*. Pursuant to 40 CFR 63.11092(b), the Continuous Monitoring System (CMS) shall be installed by January 10, 2011.

The Initial Title V Engineering Evaluation, Section IX.B.26, 40 CFR Part 63, Subpart 6B, *Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*, has been revised to address the appropriate requirements of this subpart.

## Comment #3

Tesoro requests the removal of all references to 40 CFR Part 64, Compliance Assurance Monitoring in the Draft Initial Title V Operating Permit. As explained in Section 4.7 of the Initial Title V Permit Application, under 40 CFR Part 64, the Compliance Assurance Monitoring (CAM) Regulations, facilities are required to prepare and submit monitoring plans for certain emission units with **certain** Title V applications. Tesoro agrees that the loading rack and vapor recovery system (VRS) are subject to the CAM Regulations, but disagrees that the Initial Title V Operating Permit is the appropriate permitting mechanism to require a CAM Plan.

40 CFR 64.5(a) states that facilities with "large pollutant-specific emissions units" must submit a CAM Plan with an Initial or Significant Title V Operating Permit Application. A "large pollutant specific emissions unit" is one that emit greater than 100 percent of the amount, in tons per year (taking into account control devices), required for a source to be classified as a major source. The VRS stack does not emit more than 10 tpy. As

such, the loading rack and VRS do not meet the definition of a "large pollutant-specific emission unit." 40 CFR 64.5(b) states that all other emission sources must submit a CAM Plan as part of the Title V Operating Permit Renewal Application. As such, Tesoro is only required to submit a CAM Plan for the loading rack and VRS at the time of the Title V Permit **Renewal** Application – not in the Initial Title V Operating Permit Application.

Please also update the Initial Title V Engineering Evaluation, Section IX.B.27, 40 CFR Part 64, Compliance Assurance Monitoring (CAM) to address the inapplicability of submitting a CAM Plan as part of an Initial Title V Operating Permit Application

### **Response**

All references to 40 CFR Part 64, Compliance Assurance Monitoring in the Draft Initial Title V Operating Permit have been removed.

As demonstrated below, the post-control potential to emit from the loading rack and vapor recovery system is not greater than the major source threshold, ten tons of VOC per year in this case. Per 40 CFR 64.5(a), these emission units are not "large pollutant-specific emissions units", therefore, CAM Plan is not required during the Initial Title V Operating Permit Application. Per 40 CFR 64.5(b), the facility is required to submit a CAM Plan for the loading rack and vapor recovery system at the time of the Title V Permit Renewal Application.

#### Post-Control Potential to Emit Calculation:

The post-control potential to emit for the loading rack will be calculated based on the daily throughput limit, the VOC emission EF of the vapor recovery system, and the worst-case operating schedule of 365 days per year as follow:

$$\begin{aligned} PE_{\text{Controlled}} &= [450,000 \text{ gal/day} \times 365 \text{ day/year} \times 0.08 \text{ lb-VOC}/1,000 \text{ gal}] \\ &= 13,140 \text{ lb-VOC/year} \\ &= 6.57 \text{ ton-VOC/year} \end{aligned}$$

The Initial Title V Engineering Evaluation, Section IX.B.27 has also been revised to reflect this change.

#### Comments on Proposed Initial Title V Engineering Evaluation

##### **Comment #1**

Initial Title V Engineering Evaluation, Page 1. Please change the Responsible Official and Title to be as follows:

Responsible Official: ~~Michael McCann~~ Rick D. Weyen  
Title: ~~Vice President, Pipelines and Terminals~~ Vice President, Operations.

**Response**

The Responsible Official and Title have been updated.

**Comment #2**

Initial Title V Engineering Evaluation, Section IX.B.22. To correctly quote 40 CFR Part 60, Subpart Ka, please revise the text to read as follows:

This subpart applies to storage vessels with a capacity of less greater than 151,416 liters (equivalent to 40,000 gallons)...

Additionally, the fourth column of the table is titled "Capacity < 400,000 gallons." It is unclear if SJVAPCD intended this number to be 40,000 gallons (for basic applicability to NSPS Subpart Ka) or 420,000 gallons (for petroleum or condensate stored, processed, or treated prior to custody transfer). Please update the title accordingly.

**Response**

This sentence has been revised. The revised sentence is as follows:

"This subpart applies to storage vessels with a capacity of greater than 151,416 liters (equivalent to 40,000 gallons) that is used to store petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984."

The reference table has been revised. The revised table is as follows:

Permit Units	PL stored	Tank Capacity (gallon)	Capacity < 420,000 gallon?	Date After 5/18/78 & Prior to 7/23/84?	Exempt?
N-845-1	Gasoline	420,000	No	No	Yes
N-845-4	Gasoline	714,000	No	No	Yes
N-845-5	Gasoline	840,000	No	No	Yes
N-845-10	Transmix	20,000	Yes	N/A	Yes
N-845-23	Diesel Lubricity Additive	4,000	Yes	N/A	Yes

**Comment #3**

Initial Title V Engineering Evaluation, Section IX.B.29. The current text duplicates text under Title V Application Review Section IX.B.28 regarding 40 CFR Part 82, Subpart B, *Protection of Stratospheric Ozone, Servicing of Motor Vehicle Air Conditioners*. If this section was meant to reference Subpart F, to which Permit Number N-845-0-1 Condition 27 applies, please adjust the text accordingly.

## Response

Sections IX.B.28 and IX.B.29 have been revised and consolidated. The revised section is as follows:

28) 40 CFR Part 82, Subparts B and F, Protection of Stratospheric Ozone, Servicing of Motor Vehicle Air Conditioners and Recycling and Emission Reduction

These are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC).

Compliance with the requirements of these regulations will be ensured with the listed permit conditions for the facility-wide permit in the table below:

Permit Number	Permit Condition Number
N-845-0-1	27 and 28

## Comment #4

Initial Title V Engineering Evaluation, Section X. To be consistent with the Attachment name, please revise the text to read as follows:

~~See Attachment A- Draft Renewed Title V Operating Permit~~ **Draft Initial Title V Operating Permit**

## Response

Section X has been revised.

## Comment #5

There are minor grammatical errors throughout the Initial Title V Engineering Evaluation. A few examples are listed below:

- a. "Section 9.9 requires the permit specify that..." – Page 12
- b. "See detail discussions in the following sections" - Page 14.
- c. "These internal floating roof storage tanks do not equipped" – Page 19.
- d. "... facility with daily transfer throughput more than 20,000 gallons of organic liquids..." – Page 22.
- e. "This subpart applies to storage vessels: a) has a capacity greater than..., b) has a capacity greater than..." – Page 27
- f. "Detail discussions are follows" - Pages 27, 28, and 30.
- g. "This bulk gasoline terminal has only one loading rack which deliver liquid..." – Page

**Response**

These grammatical errors have been addressed.

Comments on Draft Permit N-845-0-1**Comment #1**

Draft Initial Title V Operating Permit N-845-0-1, Condition 10. This condition states that reports shall contain information from "*required monitoring*" at least every six months. However, when reviewing the equipment-specific permits, the monitoring data to include in the semi-annual report is not specified. Please add language in the permit to clearly specify what information SJVAPCD would like to see in the Condition 10 reports.

**Response**

Condition #10 of permit N-845-0-1 states "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"

Each equipment-specific permit has clearly specified the monitoring requirements and the reporting frequency, if there is any such requirements exist. An example is as follows:

Revised Draft permit N-845-22-2

Condition #25 states "The owner or operator shall report the number of equipment leaks not repaired within 15 days after detection in a semi-annual report. [40 CFR 63.11089(g)] Federally Enforceable Through Title V Permit"

Condition #26 states "The owner or operator shall submit a semi-annual compliance report that includes each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. [40 CFR 63.11088(f) and 40 CFR 636.11095(a)(2)] Federally Enforceable Through Title V Permit"

Therefore, additional language to specify the required monitoring and/or reporting requirements is not necessary, and no additional language will be added to any equipment-specific permits for this purpose.

## **Comment #2**

Draft Initial Title V Operating Permit N-845-0-1, Conditions 10 and 40. Condition 10 requires that Tesoro submit monitoring reports every six months. Condition 40 states that a "*Report of Required Monitoring*" is due within 30 days after the end of the reporting period. Please confirm that the Condition 10 report is the same as the "*Report of Required Monitoring*." If this is the case, please use the same report title in Condition 10 for consistency.

## **Response**

The original condition #40 has been revised. The revised condition is listed as condition #42 in the revised draft N-845-0-1 as follows:

"On {Month, Day, Year}, the initial Title V permit was issued. The reporting periods for reports including the required monitoring and certifications of compliance 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] Federal Enforceable Through Title V Permit"

## **Comment #3**

Draft Initial Title V Operating Permit N-845-0-1, Conditions 36 and 40. Condition 36 requires that Tesoro submit certifications of compliance annually. Condition 40 states that a "*Compliance Certification Report*" is due within 30 days after the end of the reporting period. Please confirm that the Condition 36 report is the same as the "*Compliance Certification Report*." If this is the case, please use the same report title in Condition 36 for consistency.

## **Response**

Please see response to comment #2 on draft permit N-845-0-1 above.

## **Comment #4**

Draft Initial Title V Operating Permit N-845-0-1, Conditions 41 and 42. To be consistent with the SJVAPCD Facility-wide Umbrella General Permit Template, please add the following conditions:

*41. 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]*

42. 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) [sic]; 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].

### **Response**

The proposed conditions have been added to the draft Initial Title V permit N-845-0-1. Please see detail discussion in Proposed Initial Title V Engineering Evaluation Section XI, Permit Shield.

### Comments on Draft Permit N-845-6-2

#### **Comment #1**

Draft Initial Title V Operating Permit N-845-6-2, Condition 2. It seems that Condition 7 encompasses all requirements that Condition 2 specifies. Please remove Condition 2 from this permit to eliminate redundancy.

### **Response**

Condition #2 of this permit enforces the requirements of District Rule 4624, section 5.1 and federal regulations 40 CFR 60.502(b) and 40 CFR 63.11088(a).

Condition #7 of this permit enforces the requirements of District Rule 4624, section 5.5.

These two conditions enforce different requirements. Therefore, both conditions will stay the same with no changes and will not be removed from the permit.

### Comments on Draft Permit N-845-10-1

#### **Comment #1**

Draft Initial Title V Operating Permit N-845-10-1, Description. Please update the Equipment Description to the following:

*One 20,000 gallon vertical fixed roof volatile organic liquid storage tank (TK-420) served by a carbon adsorption/vapor recovery system (N-845-22).*

## **Response**

The equipment description of draft permit N-845-10-1 is identical to the current Permit to Operate (PTO) N-845-10-0. This storage tank is currently permitted to store transmix instead of volatile organic liquid. In addition, the most recent issued ATC N-845-10-2 has not been implemented at the time of this response was prepared. Therefore, the equipment description of this permit unit will stay the same with no changes.

### Comments on Draft Permit N-845-22-2

#### **Comment #1**

Draft Initial Title V Operating Permit N-845-22-2, Condition 1. Condition 1 states the "VOC removal efficiency shall be at least 95%". This condition is not required in the current Permit to Operate (PTO) N-845-22-1, and should be removed from the Draft Initial Title V Operating Permit.

#### **Response**

Condition #1 has been removed.

#### **Comment #2**

Draft Initial Title V Operating Permit N-845-22-2, Condition 2. It seems that Condition 6 encompasses all requirements that Condition 2 specifies. Please remove Condition 2 from this permit to eliminate redundancy.

#### **Response**

Condition #2 of this permit enforces the requirements of District Rule 4624, section 5.1 and federal regulations 40 CFR 60.502(b) and 40 CFR 63.11088(a).

Condition #6 of this permit enforces the requirements of District Rule 4624, section 5.5.

These two conditions enforce different requirements. Therefore, both conditions will stay the same with no changes and will not be removed from the permit.

#### **Comment #3**

Draft Initial Title V Operating Permit N-845-22-2, Condition 14. This condition should be removed as the source testing methods described do not help to demonstrate compliance with the limit set forth in the PTO that "*total volatile organic compound (VOC) emissions from the vapor recovery system shall not exceed 0.08 pounds per 1,000 gallon of liquid throughput*". Additionally, NSPS Subpart XX does not currently apply to the loading rack and VRS. Further, Draft Title V Permit N-845-22-2, Condition 15 is sufficient in describing the source testing methods to comply with the 0.08 pound



per 1,000 gallon of liquid throughout.

### **Response**

As discussed in response to Comment #1 of the General Comments: Proposed Initial Title V Engineering Evaluation and Draft Initial Title V Operating Permit, the loading rack and the vapor recovery system are currently subject to the requirements of NSPS Subpart XX, *Standards of Performance for Bulk Gasoline Terminals*. In addition, the original condition #14 enforces the requirements of federal regulation 40 CFR 60.503(d). Further, source testing methods use to demonstrate compliance with the VOC emission limit are specified in condition #17 of the revised draft permit N-845-22-2. Therefore, the original condition #14 will stay the same with no changes and will be listed as condition #13 in the revised draft permit N-845-22-2.

### **Comment #4**

Draft Initial Title V Operating Permit N-845-22-2, Condition 21. This condition requires source testing to establish the VOC removal efficiency. As there should not be a permit condition requiring minimum control efficiency, there is no need to require a source test to establish what the VOC removal efficiency is for the VRS.

### **Response**

Condition #21 has been removed.

In addition, the original condition #15 has also been revised. The revised condition is listed as condition #14 in the revised draft permit N-845-22-2 as follows:

"Source testing to demonstrate compliance with the VOC emission rate from the vapor recovery system serving the loading rack under Permit to Operate N-845-6 shall be conducted once every 60 months, but no more than 30 days before or after initial source test anniversary date. [District Rule 4624, 6.2.2] Federal Enforceable Through Title V Permit"

### **Comment #5**

Draft Initial Title V Operating Permit N-845-22-2, Condition 23. This condition should be removed as a continuous emission monitoring system (CEMS) should not be required until August 2013 per NESHAP Subpart 6B (See #2 under "General Comments: Proposed Initial Title V Engineering Evaluation and Draft Initial Title V Operating Permit" in this letter). As such, there is no need to have a permit condition allowing an authorized representative to inspect the required monitoring devices, as there will be no such required monitoring device.

## **Response**

As discussed in the response to Comment #2 of General Comments: Proposed Initial Title V Engineering Evaluation and Draft Initial Title V Operating Permit, the loading rack and vapor recovery system are currently subject to the requirements of NESHAP Subpart 6B, *Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*. Therefore, this condition will stay the same with no changes and will be listed as condition #21 in the revised draft permit N-845-22-2.

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Comments received on  
October 6, 2012  
and  
District's Responses

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## Wai-Man So

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**From:** Neighbors, Brooks <Brooks.D.Neighbors@tsocorp.com>  
**Sent:** Friday, October 05, 2012 5:42 PM  
**To:** Dave Warner  
**Cc:** Rupi Gill; Wai-Man So; Melissa Hillman; Biggs, Ryan K; Walker, John  
**Subject:** Comments on SJVAPCD Responses to Tesoro's Comments on Draft Initial Title V Permit N-845 Issued August 3, 2012  
**Attachments:** Stockton Draft TV Reponse to SJVAPCD Review v2 01.pdf  
**Importance:** High

Mr. Warner,

Please find attached Tesoro Logistics Operations LLC (Tesoro) comments on SJVAPCD Responses to Tesoro's Comments on Draft Initial Title V Permit N-845 Issued August 3, 2012 for Tesoro's Stockton, California Terminal.

Please feel free to contact me if you have any questions or require additional information regarding this submittal.

Sincerely,


**Brooks D. Neighbors**  
Environmental Compliance Specialist

**Tesoro Logistics GP, LLC**  
19100 Ridgewood Parkway  
San Antonio, Texas 78259  
(o) 210-626-6327  
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VIA UPS MAIL

October 05, 2012



Mr. David Warner  
Director of Permit Services  
San Joaquin Valley Air Pollution Control District  
4800 Enterprise Way  
Modesto, California 95356-8718

**Tesoro Logistics Operations LLC**  
19100 Ridgewood Parkway  
San Antonio, TX 78259  
210 626 6000 Phone

**RE: Comments on SJVAPCD Responses to Tesoro's Comments on Draft Initial Title V Permit N-845 Issued August 3, 2012**  
**Project Number: N-1110694**  
**Tesoro Logistics Operations LLC – Stockton, CA Terminal**

Dear Mr. Warner:

On April 5, 2011, Tesoro Logistics Operations LLC (Tesoro) submitted an Initial Title V Operating Permit Application to the San Joaquin Valley Air Pollution Control District (SJVAPCD) for a petroleum bulk terminal located in Stockton, CA (Stockton Terminal). SJVAPCD deemed the application complete on April 15, 2011. On August 3, 2012, SJVAPCD issued the draft Initial Title V Operating Permit and Initial Title V Engineering Evaluation. On September 7, 2012, Tesoro submitted comments on both the conditions presented in Draft Title V Permit N-845 and information contained in the Initial Title V Engineering Evaluation for SJVAPCD's review. On October 1, 2012, SJVAPCD issued District responses to each comment, requesting Tesoro's reply by October 4, 2012. Given the significant disagreements noted by SJVAPCD in the October 1, 2012 letter, Tesoro believes three days is not an appropriate amount of time to respond to all issues thoroughly. This letter addresses Tesoro's concerns with the SJVAPCD's responses.

**New Source Performance Standard (NSPS) Subpart XX**

In response to Tesoro's September 7, 2012 letter request to remove all references to NSPS Subpart XX (40 CFR 60.500 - 60.506) in the Draft Initial Title V Operating Permit, SJVAPCD responded (General Comments: Proposed Initial Title V Engineering Evaluation and Draft Initial Title V Operating Permit, Comment #1 response):

*40 CFR Part 60, Subpart A 60.2 define **Modification** as, any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted. ...*

*Tesoro submitted an Authority to Construct application to increase the daily throughput limit of the loading rack from 250,000 gallons to 450,000 gallons under project N-1001299 on December 10, 2000. The ATC N-845-6-1 for the proposed modification was implemented on October 1, 2001, and this modification resulted increase of VOC emissions. Therefore, the loading rack is currently subject to the requirements of NSPS Subpart XX, Standards of Performance for Bulk Gasoline Terminals.*

Tesoro would like to point out the following citation which clearly demonstrates that the December 2000 permitting action did not cause the loading rack to be a modified unit under NSPS Subpart XX. Per NSPS Subpart A (40 CFR 60.14(e)(2)),

*(e) The following shall not, by themselves, be considered modifications under this part: ...*

*(2) An increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure on that facility.*

Tesoro did not incur a capital expenditure to increase the daily throughput limit at the loading rack. Tesoro merely requested that SJVAPCD increase the permitted throughput limit at the loading rack for which the facility was **already designed to accommodate**. As noted in the Initial Title V Permit Application, Section 4.4.5 and in Tesoro's September 7, 2012 letter, the loading rack at the Stockton Terminal is not currently subject to NSPS Subpart XX.

Tesoro requests the removal of all references to NSPS Subpart XX (40 CFR 60.500 - 60.506) in the Draft Initial Title V Operating Permit. Please also update the Initial Title V Engineering Evaluation, Section IX.B.24, NSPS Subpart XX, *Standards of Performance for Bulk Gasoline Terminals* to address the inapplicability of NSPS Subpart XX to the loading rack at the Stockton Terminal.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart BBBBBB (6B)**

In response to Tesoro's September 7, 2012 letter request to update the NESHAP Subpart 6B loading rack requirements in the Draft Initial Title V Operating Permit, SJVAPCD responded (General Comments: Proposed Initial Title V Engineering Evaluation and Draft Initial Title V Operating Permit, Comment #2 response):

*According to the past five years emissions inventory records, 2007 thru 2011 provided by the facility, the daily average gasoline throughput of the loading rack is greater than 250,000 gallons since 2007.*

Please note that the totals calculated in the District responses are based on total annual throughput at the loading rack, including gasoline and distillate product. Table 1 below provides additional documentation on the annual throughput at the loading racks, specified by product type. Table 2 below demonstrates that the gasoline throughput at the loading rack did not exceed 250,000 gallons per day until 2010.

**Table 1. Tesoro Stockton Terminal - Annual Tank Throughput (gal/year)**

Year	Gasoline <sup>1</sup>	Distillate Fuel Oil #2	119 Additive <sup>2</sup>	Red Dye BK-50 <sup>2</sup>
2007	79,817,389	37,614,842	10,292	-
2008	72,774,121	35,623,495	10,055	-
2009	75,518,358	34,245,113	7,827	-
2010	100,818,487	29,898,244	5,162	763
2011	110,841,167	30,692,673	5,294	784

1. Ethanol and 121 Additive are added to gasoline prior to loading into the tanker trucks. The gasoline mixture (gasoline blended with ethanol and additive 121) meets the definition of gasoline provided in SJVAPCD Rule 4624.

2. The 119 Additive and Red Dye BK-50 are diesel additives.

**Table 2: Tesoro Stockton Terminal - Average Tank Throughput**

	<b>Annual Throughput (gal/year)</b>	<b>Annual Throughput - Gasoline ONLY (gal/year)</b>	<b>Days/year</b>	<b>Daily Average Throughput (gal/day)</b>	<b>&gt; 250,000 (gal/day)</b>	<b>Applicability of NESHAP Subpart 6B Table 2.1</b>
2007	117,442,523	79,817,389	365	218,678	No	No
2008	108,407,671	72,774,121	365	199,381	No	No
2009	109,772,159	75,518,358	365	206,900	No	No
2010	130,722,656	100,818,487	365	276,215	Yes	Yes
2011	141,539,918	110,841,167	365	303,674	Yes	Yes

Tesoro requests that SJVAPCD update the NESHAP Subpart 6B loading rack requirements in the Draft Initial Title V Operating Permit. As noted in Section 4.6.3 of the Initial Title V Permit Application and Tesoro's September 7, 2012 letter, Tesoro had an annual average daily throughput greater than 250,000 gallons per day in August 2010. Tesoro submitted a Notification of Compliance Status (NOCS) to the EPA and SJVAPCD for this volume of throughput in January 2011 per 40 CFR 63.11093(b). Per 40 CFR 63.11083(c), the terminal has three years to come into compliance with the requirements of NESHAP Subpart 6B at the increased level of gasoline throughput. The loading rack at the Stockton Terminal will meet the stricter requirements stipulated in Table 2 of NESHAP Subpart 6B by August 2013. Therefore, the requirements that are solely required for loading racks that have a gasoline throughput greater than 250,000 gallons per day should be removed from the Draft Initial Title V Operating Permit (e.g., the continuous emissions monitoring system [CEMS]). SJVAPCD should update the permit conditions to list the appropriate requirements for loading racks with a throughput less than or equal to 250,000 gallons per day, as provided in NESHAP Subpart 6B.

Please also update the Initial Title V Engineering Evaluation, Section IX.B.26, 40 CFR Part 63 Subpart 6B, *Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities* to address the appropriate NESHAP Subpart 6B loading rack requirements to the Stockton Terminal.

**Draft Permit N-845-0-1**

1. In response to Tesoro's September 7, 2012 letter request to clarify what is meant by "required monitoring" to include in reports required under Facility-Wide Permit, N-845-0-1, Condition 10, SJVAPCD responded (Comments on Draft Permit N-845-0-1, Comment #1 response):

*Each equipment-specific permit has clearly specified the monitoring requirements and the reporting frequency, if there is any such requirements exist (sic).*

It appears there is some confusion as to what is required to be submitted to SJVAPCD as part of the Title V Operating Permit semi-annual monitoring report (required under SJVAPCD Rule 2520.9.5.1) and the Semi Annual Monitoring Reports required under NESHAP Subparts A and 6B. These are two separate reports and generally have different elements that are required to be submitted to EPA and/or SJVAPCD. SJVAPCD provides examples that Conditions 25 and 26 of Revised Draft Permit N-845-22-2 clearly specify what is to be provided in the Title V Operating Permit semi-annual monitoring report. However, Condition 25 and 26 actually include information to include in the Semi Annual Report due to EPA on July 30 and January 30 of each year, as a result of NESHAP 6B, and not the Title V Operating Permit semi-annual monitoring report.

Mr. Warner - Page 4  
October 05, 2012

It is unclear what information SJVAPCD expects Tesoro to include in the Title V Operating Permit semi-annual monitoring report. Tesoro requests that SJVAPCD add language in the permit to clearly specify what information SJVAPCD expects Tesoro to include in the Title V Operating Permit semi-annual monitoring reports.

Due to the degree of changes expected to the Draft Title V Operating Permit, Tesoro requests the opportunity to review the Draft Title V Operating Permit in full prior to the final issuance of the Title V Operating Permit. Although Tesoro recognizes that SJVAPCD is compelled to issue the Title V Operating Permit by October 15, 2012, Tesoro is willing to work with SJVAPCD to correct all current issues. If necessary, Trinity Consultants can meet with SJVAPCD on Tesoro's behalf to discuss any remaining issues during the week of October 8, 2012

Tesoro appreciates SJVAPCD's review of the comments contained herein. If you have any questions, please contact me at (210) 626-6327.

Sincerely,



Mr. Brooks Neighbors  
Environmental Compliance Specialist  
Tesoro Logistics GP LLC

cc: Ms. Melissa Hillman, Trinity Consultants (Oakland, CA)  
Mr. Wai-Man So, SJVAPCD (Modesto, CA)  
Mr. Rupl Gill, SJVAPCD (Modesto, CA)  
Mr. John Walker, Tesoro (Stockton, CA)  
Mr. Ryan Biggs, Tesoro (San Antonio, TX)



**Applicant's Comments on Responses to Applicant Comments  
Received September 10, 2012 on the Proposed Initial Title V  
Engineering Evaluation and Initial Title V Operating Permit:**

On October 6, 2012, the District received comments from the applicant on the District's responses to the applicant comments received on September 10, 2012 on the proposed Initial Title V Engineering Evaluation and Draft Initial Title V Operating Permit. These comments and the District responses to each comment are given in the following section.

**Comment #1 – New Source Performance Standard (NSPS) Subpart XX**

In response to Tesoro's September 7, 2011 letter request to remove all references to NSPS Subpart XX (40 CFR 60.500 – 60.506) in the Draft Initial Title V Operating Permit, SJVAPCD responded (General Comments: Proposed Initial Title V Engineering Evaluation and Draft Initial Title V Operating Permit, Comments #1 response):

*40 CFR Part 60, Subpart A §60.2 define **Modification** as, any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted. ...*

*Tesoro submitted an Authority to Construct application to increase the daily throughput limit of the loading rack from 250,000 gallons to 450,000 gallons under project N-1001299 on December 10, 2000. The ATC N-845-6-1 for the proposed modification was implemented on October 1, 2001, and this modification resulted increase of VOC emissions. Therefore, the loading rack is currently subject to the requirements of NSPS Subpart XX, Standards of Performance for Bulk Gasoline Terminals.*

Tesoro would like to point out the following citation which clearly demonstrates that the December 2000 permitting action did not cause the loading rack to be a modified unit under NSPS Subpart XX, Per NSPS Subpart A (40 CFR 60.14(e)(2)),

*(e) The following shall not, by themselves, be considered modifications under this part:*

*...  
(2) An increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure on that facility.*

Tesoro did not incur a capital expenditure to increase the daily throughput limit at the loading rack. Tesoro merely requested that SJVAPCD increase the permitted throughput limit at the loading rack for which the facility was **already designed to accommodate**. As noted in the initial Title V Permit Application, Section 4.4.5 and in Tesoro's September 7, 2012 letter, the loading rack at the Stockton Terminal is not currently subject to NSPS Subpart XX.

Tesoro requests the removal of all references to NSPS Subpart XX (40 CFR 60.500 – 60.506) in the Draft Initial Title V Operating Permit. Please also update the initial Title V Engineering Evaluation, Section IX.B.24, NSPS Subpart XX, *Standards of Performance for Bulk Gasoline Terminals* to address the inapplicability of NSPS Subpart XX to the loading rack at the Stockton Terminal.

### **Response**

40 CFR Part 60, Subpart A §60.14 Modification, §60.14(e)(2) states that an increase in production rate of an existing facility, if that increase can be accomplished without a capital expenditure on that facility, this action shall not be considered modifications under this part.

According to the additional information provided by the applicant during the public notice commenting period, the applicant testified that the increase of the daily throughput limit of the loading rack from 250,000 gallons to 450,000 gallons conducted in 2001 did not result in a capital expenditure to the facility. Therefore, the permitting action conducted in 2001 was not considered a modification under this subpart.

The District concluded that the existing loading rack is not currently subject to the requirements of NSPS Subpart XX, *Standards of Performance for Bulk Gasoline Terminals*.

Permit conditions associated with the requirements of NSPS Subpart XX in the draft initial Title V Operating Permit N-845-6-2 have been removed, and the Initial Title V Engineering Evaluation, Section IX.B.24, NSPS Subpart XX, *Standards of Performance for Bulk Gasoline Terminals*, has been revised to address these changes.

### **Comment #2 – National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart BBBBBB (6B)**

In response to Tesoro's September 7, 2011 letter request to update the NESHAP Subpart 6B loading rack requirements in the Draft Initial Title V Operating Permit, SJVAPCD responded (General Comments: Proposed Initial Title V Engineering Evaluation and Draft Initial Title V Operating Permit, Comments #2 response):

*According to the past five years emissions inventory records, 2007 thru 2011 provided by the facility, the daily average gasoline throughput of the loading rack is greater than 250,000 gallons since 2007.*

Please note that the totals calculated in the District responses are based on total annual throughput at the loading rack, including gasoline and distillate product. Table 1 below provides additional documentation on the annual throughput at the loading rack, specified by product type. Table 2 below demonstrates that the gasoline throughput at the loading rack did not exceed 250,000 gallons per day until 2010.

Table 1. Tesoro Stockton Terminal – Annual Tank Throughput (gal/year)

Year	Gasoline <sup>1</sup>	Distillate Fuel Oil #2	119 Additive <sup>2</sup>	Red Dye BK-50 <sup>2</sup>
2007	79,817,389	37,614,842	10,292	-
2008	72,774,121	35,623,495	10,055	-
2009	75,518,358	34,245,113	7,827	-
2010	100,818,487	29,898,244	5,162	763
2011	110,841,167	30,692,673	5,294	784

1. Ethanol and 121 Additive are added to gasoline prior to loading into the tanker trucks. The gasoline mixture (gasoline blended with ethanol and additive 121) meets the definition of gasoline provided in SJVAPCD Rule 4624.
2. The 119 Additive and Red Dye BK-50 are diesel additives.

Table 2. Tesoro Stockton Terminal – Average Tank Throughput

	Annual Throughput (gal/year)	Annual Throughput – Gasoline ONLY (gal/year)	Days/year	Daily Average Throughput (gal/day)	> 250,000 (gal/day)	Applicability of NESHAP Subpart 6B Table 2.1
2007	117,442,523	79,817,389	365	218,678	No	No
2008	108,407,671	72,774,121	365	199,381	No	No
2009	109,772,159	75,518,358	365	206,900	No	No
2010	130,722,656	100,818,487	365	276,215	Yes	Yes
2011	141,539,918	110,841,167	365	303,674	Yes	Yes

Tesoro requests that SJVAPCD update the NESHAP Subpart 6B loading rack requirements in the Draft Initial Title V Operating Permit. As noted in Section 4.6.3 of the Initial Title V Permit Application and Tesoro's September 7, 2012 letter, Tesoro had an annual average daily throughput greater than 250,000 gallons per day in August 2010. Tesoro submitted a Notification of Compliance Status (NOCS) to the EPA and SJVAPCD for this volume of throughput in January 2011 per 40 CFR 63.11093(b). Per 40 CFR 63.11083(c), the terminal has three years to come into compliance with the requirements of NESHAP Subpart 6B at the increased level of gasoline throughput. The loading rack at the Stockton Terminal will meet the stricter requirements stipulated in Table 2 of NESHAP Subpart 6B by August 2013. Therefore, the requirements that are solely required for loading racks that have a gasoline throughput greater than 250,000 gallons per day should be removed from the Draft Initial Title V Operating Permit (e.g., the continuous emissions monitoring system [CEMS]). SJVAPCD should update the permit conditions to list the appropriate requirements for loading racks with a throughput less than or equal to 250,000 gallons per day, as provided in NESHAP Subpart 6B.

Please also update the Initial Title V Engineering Evaluation, Section IX.B.26, 40 CFR Part 63 Subpart 6B, *Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities* to address the appropriate NESHAP Subpart 6B loading rack requirements to the Stockton Terminal.

## **Response**

During the public notice commenting period, the applicant provided additional gasoline throughput records of 2007 through 2011 for the loading rack. This additional information indicated that the daily average gasoline throughput of the loading rack is greater than 250,000 gallons since August 2010.

40 CFR 63.11083(c) states that if an existing affected source that becomes subject to the control requirements in this subpart because of an increase in the daily throughput, as specified in option 1 of Table 2 to this subpart, the owner or operator must comply with the standards in this subpart no later than 3 years after the affected source becomes subject to the control requirements in this subpart.

Therefore, the District concluded that the existing loading rack is currently subject to the requirements specified in option 2 of Table 2 of this subpart. The owner or operator shall comply with the control requirements specified in option 1 of Table 2 to this subpart by August 1, 2013. The following condition has been added to the revised draft Initial Title V operating permit N-845-6-2 to ensure compliance of this requirement.

"The owner or operator shall comply with the control requirements specified in option 1 of Table 2 to the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart BBBB (6B) by August 1, 2013. [40 CFR 63.11083(c)] Federally Enforceable Through Title V Permit"

Permit conditions associated with the requirements specified in option 1 of Table 2 to the NESHAP Subpart 6B, §63.11092, Testing & Monitoring Requirements, in the draft initial Title V Operating Permit N-845-6-2 have been removed, and the Initial Title V Engineering Evaluation, Section IX.B.26, NESHAP Subpart 6B, Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities, has been revised to address these changes.

### **Comment #3 – Draft Permit N-845-0-1**

In response to Tesoro's September 7, 2012 letter request to clarify what is meant by "required monitoring: to include in reports required under Facility-Wide Permit, N-845-0-1, Condition 10, SJVAPCD responded (Comments on Draft Permit N-845-0-1, Comment #1 response):

*Each equipment-specific permit has clearly specified the monitoring requirements and the reporting frequency, if there is any such requirements exist (sic).*

It appears there is some confusion as to what is required to be submitted to SJVAPCD as part of the Title V Operating Permit semi-annual monitoring report (required under SJVAPCD Rule 2520.9.5.1) and the Semi Annual Monitoring Reports required under NESHAP Subparts A and 6B. These are two separate reports and generally have different elements that are required to be submitted to EPA and/or SJVAPCD.

SJVAPCD provides examples that Conditions 25 and 26 of Revised Draft Permit N-845-22-2 clearly specify what is to be provided in the Title V Operating Permit semi-annual monitoring report. However, Condition 25 and 26 actually include information to include in the Semi Annual Report due to EPA on July 30 and January 30 of each year, as a result of NESHAP 6B, and not the Title V Operating Permit semi-annual monitoring report.

It is unclear what information SJVAPCD expects Tesoro to include in the Title V Operating Permit semi-annual monitoring report. Tesoro requests that SJVAPCD add language in the permit to clearly specify what information SJVAPCD expects Tesoro to include in the Title V Operating Permit semi-annual monitoring reports.

### **Response**

Tesoro is classified as a bulk gasoline terminal. The facility has various emission units including internal floating roof storage tanks, external floating roof storage tank, fix roof storage tanks, loading rack, and vapor recovery system. Each specific emission unit is subjected to the associated monitoring, inspection, and reporting requirements pursuant to the applicable District rules and federal regulations. The monitoring, inspection, and reporting requirements for each emissions unit have been specified in each associated permit. Therefore, no additional language will be added to any equipment-specific permits.

Detailed discussions are follows:

For storage tanks, the facility elected to include the internal floating roof tanks, external floating roof tank, and fix roof tank into the Voluntary Tank Preventive Inspection & Maintenance, and Tank Cleaning Program. The monitoring, inspection, and reporting requirements for each type of storage tank are stated in District Rule 4623 Section 5.7 Table 3, 4, and 5 respectively. These specific requirements have been outlined on each associated permit, such as conditions 23 through 28 on permit N-845-1-3.

For loading rack and vapor recovery system, the monitoring, inspection, and reporting requirements are stated in District Rule 4624, Section 5.0. These specific requirements have been outlined on these permits, such as conditions 8 through 11 on permit N-842-6-2, and conditions 4 through 7 on permit N-842-22-2. In addition, the daily gasoline throughput limit of the loading rack is specified in condition 1 of permit N-842-6-2.

In addition, the District Compliance Division has published a Compliance Assistance Bulletin – Title V Reporting Requirements to assist Title V Permit holders in preparing the required reports. The bulletin outlines the reporting requirements, instructions, and deadlines. This bulletin is available to view/download from the District website: [http://www.valleyair.org/busind/comply/Forms/TitleV\\_Complete\\_Compliance\\_Reporting\\_Package\\_081909.pdf](http://www.valleyair.org/busind/comply/Forms/TitleV_Complete_Compliance_Reporting_Package_081909.pdf)

The District encourages facilities in streamlining the reporting procedures to both District and EPA. Facilities are welcome to consolidate the required monitoring reports for both government agencies into one report for submission. Please see Compliance Assistance Bulletin – Title V Reporting Requirements for details.

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Comments received on  
October 9, 2012  
and  
District's Responses

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## Wai-Man So

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**From:** Geoffrey Glass <Glass.Geoffrey@epamail.epa.gov>  
**Sent:** Tuesday, October 09, 2012 3:15 PM  
**To:** Wai-Man So  
**Cc:** Nick Peirce; Rupi Gill  
**Subject:** Re: FW: Revised EE & Permits for Initial TV Permit N845, 1110694

Wai-Man:

I understand what you are saying about the NSPS and NESHAP and their applicability.

When you issue the final permit, please address Condition 20 of N-845-22-2. This condition cites both a District Rule and NESHAP BBBBBB and you should demonstrate that complying the permit conditions will ensure compliance with both the District and Federal requirements.

Geoffrey Glass  
Environmental Engineer  
EPA Region 9  
Air Division, Permits Office  
415-972-3498

---

**From:** Wai-Man So <Wai-Man.So@valleyair.org>  
**To:** Geoffrey Glass/R9/USEPA/US@EPA  
**Cc:** Rupi Gill <Rupi.Gill@valleyair.org>, Nick Peirce <Nick.Peirce@valleyair.org>  
**Date:** 10/09/2012 01:49 PM  
**Subject:** FW: Revised EE & Permits for Initial TV Permit N845, 1110694

---

Hi Geoffrey,

Please find the 2<sup>nd</sup> revised draft PTOs N-845-6-2 (loading rack) and N-845-22-2 (vapor recovery system) in the attachment.

This set of revised permits contain no requirements of: a) CAM, b) NSPS Subpart XX, and c) NESHAP Subpart 6b, §63.11092, Testing & Monitoring Requirements (Table 2, option 1).

Thanks again, and will talk to you soon.  
Wai-Man

**From:** Wai-Man So  
**Sent:** Tuesday, October 09, 2012 11:40 AM  
**To:** 'Geoffrey Glass'  
**Subject:** RE: Revised EE & Permits for Initial TV Permit N845, 1110694

Good Morning Geoffrey,

Couple changes to the revised engineering evaluation (the version I email you on 10/1/12) have been made, the consultant provided additional information, after reviewing the District's responses to their original comments, and claim that the loading rack is exempt from the requirements of NSPS Subpart XX and NESHAP Subpart 6B, §63.11092, Testing & Monitoring Requirements (Table 2, option 1), detailed below:



NSPS Subpart XX

The applicant testified that the modification of the loading rack conducted in 2001, to increase the daily gasoline throughput from 250,000 gallons to 450,000 gallons, did not incur a capital expenditure to the facility, which action was not considered a modification pursuant to 40 CFR 60.14(e)(2). Therefore, the existing loading rack is exempt from the requirements of Subpart XX.

NESHAP Subpart 6B

The applicant provided more detail breakdown throughput records for the loading rack from 2007 through 2011, the gasoline (only) throughput exceed the 250,000 gal/day (Subpart 6B Table 2, option 1 limit) starting August 2010. Pursuant to §63.11083(c), the facility has three years to come into compliance with the requirements specified in Subpart 6B Table 2 option 1, so the facility is obligated to comply with the testing & monitoring requirements (e.g. CEMS) of subpart 6B by August 2013, but not now. Therefore, the loading rack & vapor recovery system are not currently subject to the testing & monitoring requirements of the Subpart 6B Table 2 option 1, but subject to the requirements of Subpart 6B Table 2 option 2.

According to the additional information provided by the consultant, the District agreed that the loading rack is exempt from the requirements of Subpart XX, and both loading rack and the vapor recovery system are exempt from the requirements of Subpart 6B Table 2 option 1. Also, CAM plan is not required during this initial TV application.

Please note, the deadline for the final notice be published is on October 15, 2012, therefore, the District would like to prepare those changes mentioned above and proceed the final notice before the deadline. My manager, supervisor, and myself will give a follow-up call to further discuss this application.

Thanks and talk to you soon.

Wai-Man  
(209) 557-6449

**From:** Geoffrey Glass [<mailto:Glass.Geoffrey@epamail.epa.gov>]  
**Sent:** Friday, October 05, 2012 3:10 PM  
**To:** Wai-Man So  
**Subject:** Re: Revised EE & Permits for Initial TV Permit N845, 1110694

Wai-Man

First, the vapor recovery system is subject to NESHAP BBBBBB, which was proposed by the Administrator after November 15, 1990, so the system is exempt from CAM by 64.2(b)(1)(i)

Second there are numerous conditions that apply to tanks based on both local rules and NSPS/NESHAP standards. Is there some discussion of streamlining available.

Please feel free to call me to discuss these issues. I will be in the office Tuesday through Thursday during the week of the 8th.

Geoffrey Glass  
Environmental Engineer  
EPA Region 9  
Air Division, Permits Office  
415-972-3498

From: Wai-Man So <[Wai-Man.So@valleyair.org](mailto:Wai-Man.So@valleyair.org)>  
To: Geoffrey Glass/R9/USEPA/US@EPA  
Date: 10/01/2012 01:50 PM  
Subject: Revised EE & Permits for Initial TV Permit N845, 1110694

Good Afternoon Mr. Glass,

By follow-up our phone conversation this afternoon, please find the revised engineering evaluation and draft permits N-845-0-1 & N-845-22-2 in the attachment.

The major comments from the consultant are related to the CAM requirements under 40 CFR Part 64, and the testing & monitoring requirements under 40 CFR Part 63, Subpart 6B, Section 63.11092.

The District forwarded the initial TV evaluation & initial draft TV operating permit for EPA review on August 3, 2012, and the deadline for the final notice be published is on October 15, 2012, so could you please let me know if you have any questions or comments on this project in your earliest convenience.

Thanks advance for your assistance in this issue..

Wai-Man So  
Air Quality Engineer  
San Joaquin Valley Air Pollution Control District  
4800 Enterprise Way, Modesto, CA 95356  
Phone (209) 557-6449 | Fax (209) 557-6475



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[attachment "N0845, 1110694 - Revised Initial TV Prelim Evaluation.pdf" deleted by Geoffrey Glass/R9/USEPA/US] [attachment "Revised Draft Facility-wide Permit N-845-0-1.pdf" deleted by Geoffrey Glass/R9/USEPA/US] [attachment "Revised Draft Permit N-845-22-2.pdf" deleted by Geoffrey Glass/R9/USEPA/US] [attachment "2nd Revised DRAFT PTO N-845-6-2.pdf" deleted by Geoffrey Glass/R9/USEPA/US] [attachment "2nd Revised DRAFT PTO N-845-22-2.pdf" deleted by Geoffrey Glass/R9/USEPA/US]

## **EPA's Comments on Proposed Initial Title V Engineering Evaluation and Initial Title V Operating Permit:**

On October 10, 2012, the District received comments from the EPA on the proposed Draft Initial Title V Operating Permit. This comment and the District response to the comment are given in the following section.

### **Comment #1**

When you issue the final permit, please address Condition 20 of N-845-22-2. This condition cites both a District Rule and NESHAP BBBB and you should demonstrate that complying the permit conditions will ensure compliance with both the District and Federal requirements.

Condition 20 of N-845-22-2 states:

"The owner or operator shall maintain a log book that contains the following information: 1.) dates of leak inspections, 2.) the nature of the leak and the method of detection; 3.) findings, 4.) corrective action (date each leak is repaired), 5.) repair methods applied in each attempt to repair the leak; 6.) the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak; 7.) the expected date of successful repair of the leak if the leak is not repaired within 15 days; 8.) the date of successful repair of the leak; and 9.) inspector name and signature. [District Rule 4624, 6.1.3, 40 CFR 63.11089(g), and 40 CFR 63.11094(e)] Federal Enforceable Through Title V Permit"

### **District Requirements**

District Rule 4624, Transfer of Organic Liquid, Section 6.1.3 states that an operator subject to any part of Section 5.0 must keep records of the daily liquid throughput and the results of any leak inspections.

This bulk gasoline terminal is classified as Class 1 Organic Liquid Transfer Facility per section 3.8 of District Rule 4624, and the loading rack is subject to the requirements of section 5.1 of this Rule. Therefore, the operator must keep records of the daily liquid throughput and the results of any leak inspections.

Condition #23 of the revised permit N-845-22-2 ensures compliance with record keeping requirement for daily liquid throughput.

The original condition #20 of permit N-845-22-2 has not been changes but will be listed as condition #19 in the revised draft Initial Title V operation permit N-845-22-2. Condition #19 ensures compliance with the record keeping requirement for leak inspections.

## Federal Requirements

NESHAP Subpart 6B, §63.11089(g) requires the owner or operator must keep records and submit reports as specified in §63.11094 and §63.11095.

NESHAP Subpart 6B, §63.11094(e) states the owner or operator shall record in the log book for each leak that is detected the information specified in paragraphs (e)(1) through (7) of this section as follows:

- (1) The equipment type and identification number.
- (2) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell).
- (3) The date the leak was detected and the date of each attempt to repair the leak.
- (4) Repair methods applied in each attempt to repair the leak.
- (5) "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak.
- (6) The expected date of successful repair of the leak.
- (7) The date of successful repair of the leak.

Condition #19 in the revised draft Initial Title V operation permit N-845-22-2 ensures compliance with the record keeping requirement specified in §63.11094(e).

NESHAP Subpart 6B, §63.11095(a)(2) states the owner or operator shall report each loading of a gasoline cargo tank for which vapor tightness document had not been previously obtained by the facility.

Condition #21 in the revised draft Initial Title V operation permit N-845-22-2 ensures compliance with the report submitting requirement specified in §63.11095(a)(2).

Therefore, condition #19 of the revised draft Title V operating permit N-845-22-2 ensures compliance with both District and Federal record keeping requirements for leak inspections.