



FEB 12 2013

Theresa Geijer
Equilon Enterprises LLC
2555 13th Ave SW
Seattle, WA 98134-1013

Re: Notice of Final Action - Title V Permit
District Facility # N-758
Project # N-1111745

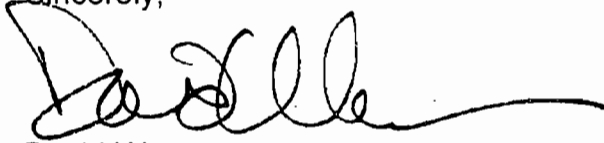
Dear Ms. Geijer:

The District has issued the Final Title V Permit for Equilon Enterprises LLC. The preliminary decision for this project was made on December 21, 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

Attachments

cc: Sajjad Ahmad, Permit Services Engineer

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
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34946 Flyover Court
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FEB 12 2013

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-758
Project # N-1111745**

Dear Mr. Rios:

The District has issued the Final Title V Permit for Equilon Enterprises LLC. The preliminary decision for this project was made on December 21, 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

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FEB 12 2013

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-758
Project # N-1111745**


Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for Equilon Enterprises LLC. The preliminary decision for this project was made on December 21, 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. Jim Swaney, Permit Services Manager, at (559) 230-5900.

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Stockton Record

**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 Equilon Enterprises LLC for its bulk terminal located at 3515 Navy Drive in Stockton, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1111745, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. For additional information regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Equilon Enterprises LLC
N-758**

Final Engineering Evaluation

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INITIAL TITLE V PERMIT APPLICATION REVIEW

Project #: N-1111745
Deemed Complete: August 11, 2011

Engineer: Sajjad Ahmad
Date: February 7, 2013

Facility Number: N-758
Facility Name: Equilon Enterprises, LLC dba Shell Oil Products US

Mailing Address: Shell Oil Products US
Seattle Terminal
2555 13th Ave SW
Seattle, WA 98134

Contact Name: Theresa Geijer (Environmental Coordinator)
Phone: (206) 618-9061

Responsible Official: Don Herman
Title: Western Region Operations Manager

I. PROPOSAL

Equilon Enterprises LLC (Equilon) is proposing that an initial Title V permit be issued for its existing bulk terminal operation at 3515 Navy Drive 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

Equilon is located at 3515 Navy Drive in Stockton, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit templates:

A. Facility-wide Umbrella General Permit Template SJV-UM-0-3

The applicant has requested to utilize template #SJV-UM-03, Facility-wide Umbrella General Permit Template for unit N-758-0-2. Based on the information submitted on the Template Qualification Form (Attachment D), the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit template and are not subject to further EPA or public review.

a. N-758-0-2 – Facility-Wide Requirements

- Conditions 1 through 40 on the permit are based on the Facility-Wide Umbrella Template SJV-UM-0-3.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATE

Rules Addressed by Facility-Wide Umbrella Template SJV-UM-0-3

- 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 – SIP approved amended August 18, 2011 – not SIP approved)

Recent amendments to this rule do not affect the federal applicability of this rule.

- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits [sections 5.2, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1, 9.13.2, 9.16 and 10.0], (amended June 21, 2001)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4601, Architectural Coatings (amended December 17, 2009)
- District Rule 8021, Construction, Demolition, Excavation and Other Earthmoving Activities (amended August 19, 2004)
- District Rule 8031, Bulk Materials (amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (amended August 19, 2004)
- District Rule 8051, Open Areas (amended August 19, 2004)

- District Rule 8061, Paved and Unpaved Roads (amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (amended September 16, 2004)
- 40 CFR Part 82, Subpart B and F, Stratospheric Ozone
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended April 21, 2011)
- District Rule 2410, Prevention of Significant Deterioration (adopted June 16, 2011, effective November 26, 2012)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- 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 4623, Storage of Organic Liquids (amended May 19, 2005)
- District Rule 4624, Transfer of Organic Liquid (amended December 20, 2007)
- 40 CFR Part 60, Subpart Kb – Standards 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 63, Subpart R – Gasoline Distribution Facilities (Bulk Gasoline terminals and Pipeline Breakout Stations)
- 40 CFR 63, Subpart BBBBBB – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- 40 CFR Part 64, Subpart C – Compliance Assurance Monitoring (CAM)

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:

1. Rule 4102 – Nuisance

This rule is applicable to any source operation which emits or may emit air contaminants or other materials. This rule stipulates that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such person or the public or which cause or have a natural tendency to cause injury or damage to business or property.

For this facility, condition 41 of the facility-wide requirements N-758-0-2 is based on the rule listed above and is not Federally Enforceable through Title V.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Template

1. Facility Wide Requirements

EQUILON is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-3 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements as condition numbers 1 through 40 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Template

1. District Rule 1070, Inspections

Section 4.0 of this rule states district's authority to require record keeping, to make inspections, and to conduct tests of air pollution sources.

- a. N-758-10-2 BULK LOADING RACK #2 WITH 4 GASOLINE LOADING ARMS, 2 DIESEL LOADING ARMS, AND 1 ETHANOL LOADING ARM

Condition 14 on this permit ensures compliance with this rule.

- b. N-758-11-2 BULK OFF-LOADING OPERATION UTILIZED FOR GASOLINE OR ETHANOL OFF-LOADING (RECEIVING) LOCATED AT TRUCK LOADING LANE #3

Conditions 8 and 9 on this permit ensure compliance with this rule.

- c. N-758-15-1 ONE 300 GALLON ABOVEGROUND DIESEL ADDITIVE STORAGE TANK

Condition 5 on this permit ensures compliance with this rule.

2. 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.

- a. **N-758-13-8** - ONE JOHN ZINK VAPOR RECOVERY SYSTEM, CARBON ADSORPTION UNIT, MODEL #AA1218715B AND VAPOR BLADDER TANK #16 IN THE VAPOR RECOVERY LINE BEFORE THE VAPOR RECOVERY SYSTEM

Conditions 11, 13, 15, and 16 on this permit ensure compliance with this rule.

3. District Rule 2201 - New and Modified Stationary Source Review Rule (District NSR Rule)

The permit units are subject to the District Rule 2201 upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting Permit to Operate (PTO) were addressed to define how NSR permit terms should be incorporated into the Title V permit.

a. **Permit Unit N-758-4-4 (Internal Floating Roof Tank):**

- Conditions 2 through 8 from the current PTOs have been included as conditions 1 through 7 on the requirements for the proposed permits.
- Condition 37 from the current PTOs has been included as condition 39 on the requirements for the proposed permits.
- Conditions 39 and 40 from the current PTOs have been included as conditions 42 and 43 on the requirements for the proposed permits.

b. **Permit Unit N-758-5-5 (Internal Floating Roof Tank):**

- Conditions 2 through 8 from the current PTOs have been included as conditions 1 through 7 on the requirements for the proposed permits.
- Condition 37 from the current PTOs has been included as condition 38 on the requirements for the proposed permits.
- Conditions 39 and 40 from the current PTOs have been included as conditions 40 and 41 on the requirements for the proposed permits.

c. **Permit Units N-758-6-2 and -14-3 (External Floating Roof Tanks):**

- Conditions 4 and 5 from the current PTOs have been included as conditions 2 and 3 on the requirements for the proposed permits.

d. **Permit Unit N-758-10-2 (Bulk Loading Rack #2):**

- Condition 3 from the current PTO has been included as condition 1 on the requirements for the proposed permit.
- Conditions 13 and 14 from the current PTO have been included as conditions 13 and 14 on the requirements for the proposed permit.

e. **Permit Unit N-758-11-2 (Bulk Off-Loading Operation):**

- Conditions 1 through 7 from the current PTO have been included as conditions 1 through 7 on the requirements for the proposed permit.

f. **Permit Unit N-758-12-3 (Gasoline Additive Storage Tank):**

- Conditions 3 and 4 from the current PTOs have been included as conditions 1 and 2 on the requirements for the proposed permits.

g. **Permit Unit N-758-13-8 (Vapor Recovery System):**

- Conditions 8 through 14 from the current PTO have been included as conditions 4 through 10 on the requirements for the proposed permit.
- Condition 16 from the current PTO has been included as condition 12 on the requirements for the proposed permit.
- Conditions 36 and 37 from the current PTO have been included as conditions 32 and 33 on the requirements for the proposed permit.

h. **Permit Unit N-758-15-1 (Diesel Additive Storage Tank):**

- Conditions 3 through 7 from the current PTO have been included as conditions 1 through 5 on the requirements for the proposed permit.

4. District Rule 2410 - Prevention of Significant Deterioration

The prevention of significant deterioration (PSD) program is a construction permitting program for new major stationary sources and major modifications to existing major stationary sources located in areas classified as attainment or in areas that are unclassifiable for any criteria air pollutant. The provisions of this rule apply to any source and the owner or operator of any source subject to any requirement under Title 40 Code of Federal Regulations (40 CFR) Part 52.21 as incorporated into this rule.

There are no PSD requirements for this source. Therefore, the facility is not subject to this rule and no further discussion is required.

5. District Rule 2520 - Federally Mandated Operating Permits

Mandatory Greenhouse Gas Reporting

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.

6. 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 placed, held, or stored.

The following tank permits are subject to this rule: N-758-1-1, -2-1, -3-1, -4-4, -5-5, -6-2, -7-1, -12-3, and -14-3.

Permit Unit N-758-12-3 (Exempt Tank):

Section 4.0, Exemptions

Section 4.4 states that the tanks exclusively receiving and/or storing an organic liquid with a TVP less than 0.5 psia are exempt from all other requirements of the rule except for complying with the following provisions:

- TVP and API Gravity Testing provisions pursuant to Section 6.2,
- Recordkeeping provisions pursuant to Section 6.3.6,
- Test Methods provisions pursuant to Section 6.4, and
- Compliance schedules pursuant to Section 7.2.

Permit unit N-758-12 at this facility meets this exemption and therefore will only be subject to the sections of the rule listed above. Compliance with this exemption is demonstrated with the permit conditions #3 thru 8 and 10 on the proposed Title V permit N-758-12-3.

Permit Units N-758-4-4 and -5-5 (Internal Floating Roof Tanks):

Section 5.1 of this rule requires Group C vessels (capacity greater than 39,600 gallons) storing liquids with a TVP of greater than 1.5 psia but less than 11 psia to be equipped with a floating roof or have vapor control installed. The tanks, permit units N-758-4 and -5, are internal floating roof tanks; therefore, the requirements of this section are satisfied.

Section 5.1.2 applies only to small producers and therefore is not applicable.

Section 5.1.3 requires all tanks to be leak-free, as defined in Sections 3.11, 3.17, and 3.18 of the rule. Compliance is assured by the following condition included as # 22 on PTOs N-758-4-4 and -5-5:

- {modified 2501} A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]

Section 5.2 states that the pressure-vacuum relief valve shall be set to within ten (10) percent of the maximum allowable working pressure of the tank. The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings. The pressure-vacuum relief valve shall be properly installed and maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve set pressure..

Compliance is assured by the following condition included as # 21 on PTOs N-758-4-4 and -5-5:

- {modified 2768} The tank shall be in a leak-free condition. The pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623]

Section 5.4.1, the internal floating roof tanks shall 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.

Each of the two tanks under permit units N-758-4 and -5 is a welded type tank and is equipped with mechanical shoe-type design primary seal. Therefore, each tank must meet all the specifications listed in Section 5.3.2.1. The following conditions ensure compliance with this section:

- {modified 2506} No gap between the tank shell and the primary seal shall exceed one and a half (1-1/2) inches. [District Rule 4623]
- {2507} 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]
- {2508} 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]
- {2509} No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623]
- {2510} No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623]
- {2511} 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]
- {modified 2512} 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]

- {2513} 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]
- {2515} 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]
- {2516} The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623]

N-758-4-4:

- {modified 2514} 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 and 40 CFR 60.113b(b)(4)(i)(B) and (ii)(C)]

N-758-5-5:

- {modified 2514} 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]

These conditions have been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-4-4	9 thru 19
N-758-5-5	9 thru 19

Section 5.4.3 requires the operator to comply with floating roof landing requirements specified in Section 5.3.1.3.

Compliance is assured by the following conditions included as # 8 on PTOs N-758-4-4 and -5-5:

N-758-4-4:

- The floating roof shall be floating 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 processes of filling or emptying and refilling the tank 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 the roof on its legs. [District Rule 4623 and 40 CFR 60.112b(a)(1)(i) and 63.11087(a)]

N-758-5-5:

- The floating roof shall be floating 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 processes of filling or emptying and refilling the tank 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 the roof on its legs. [District Rule 4623 and 40 CFR 63.11087(a)]

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. The tank shall be equipped with a cover, seal or lid.

Compliance is assured by the following condition included as # 20 on PTOs N-758-4-4 and -5-5:

- {modified 2517} All openings in the roof used for sampling and gauging, except pressure-vacuum (P/V) relief valve, 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]

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.

The following conditions ensure compliance with this section:

N-758-4-4:

The following conditions have been included as # 23 through 28 on PTO N-758-4-:

- 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 and 40 CFR 60.112b(a)(1)(iii) and 63.11087(a)]
- 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. [District Rule 4623; 40 CFR 60.112b(a)(1)(iv) and 63.11087(a)]
- 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. [District Rule 4623; 40 CFR 60.112b(a)(1)(v) and 63.11087(a)]
- 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. [District Rule 4623; 40 CFR 60.112b(a)(1)(vi) and 63.11087(a)]
- 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. The fabric cover must be impermeable. [District Rule 4623; 40 CFR 60.112b(a)(1)(vii) and 63.11087(a)]
- 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. The fabric sleeve must be impermeable. [District Rule 4623; 40 CFR 60.112b(a)(1)(viii) and 63.11087(a)]

N-758-5-5:

The following conditions have been included as # 23 through 28 on PTO N-758-5-5:

- 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 and 40 CFR 63.11087(a)]
- 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. [District Rule 4623 and 40 CFR 63.11087(a)]
- 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. [District Rule 4623 and 40 CFR 63.11087(a)]
- 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. [District Rule 4623 and 40 CFR 63.11087(a)]
- 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. The fabric cover must be impermeable. [District Rule 4623 and 40 CFR 63.11087(a)]
- 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. The fabric sleeve must be impermeable. [District Rule 4623 and 40 CFR 63.11087(a)]

Sections 5.5.2.3 and 5.5.2.4 list requirements for solid guidepole and slotted guidepole respectively. Tank #19 (permit unit N-758-4) has a solid guidepole and tank #20 (permit unit N-758-5) has a slotted guidepole.

The following conditions included as # 30 and 31 on PTO N-758-4-4 (tank #19) ensure compliance with this section:

- All solid sampling or gauging wells, and similar fixed projections through the floating roof such as anti-rotational pipe shall provide a projection below the liquid surface. [District Rule 4623]
- 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 not exceed one-half (1/2) inch. [District Rule 4623]

The following conditions included as # 30 and 31 on PTO N-758-5-5 (tank #20) ensure compliance with this section:

- All slotted sampling or gauging wells, and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623]
- 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 not exceed one-eighth (1/8) inch. [District Rule 4623]

Section 5.6 outlines vapor recovery system requirements for fixed roof tanks. Since the tanks (permit units N-758-4 and -5) are not fixed roof tanks, this section is not applicable.

Section 5.7 outlines the provisions for voluntary tank preventative inspection and maintenance, and tank interior cleaning program. The operator has not elected to participate in this program; therefore, no conditions are required to ensure compliance.

Section 6.1.1 states the inspection requirements for the external floating roof tanks. Since the tanks (permit units N-758-4 and -5) are not external floating roof tanks, this section is not applicable.

Section 6.1.4 requires the owner or operator shall perform a visually inspections, and conduct actual gap measurements according to the timelines specified in this section. The following conditions ensure compliance with this section:

N-758-4-4:

The following conditions have been included as # 32 through 34 on PTO N-758-4-4:

- 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; 40 CFR 60.113b(a)(1) and 63.11092(e)(1)]
- The permittee shall visually inspect, through the manholes, roof hatches, or other opening 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; 40 CFR 60.113b(a)(2) and 63.11092(e)(1)]
- 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]

N-758-5-5:

The following conditions have been included as # 32 through 34 on PTO N-758-5-5:

- 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 and 40 CFR 63.11092(e)(1)]

- The permittee shall visually inspect, through the manholes, roof hatches, or other opening 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 and 40 CFR 63.11092(e)(1)]
- 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]

Section 6.2 requires TVP and API gravity testing of stored organic liquid in uncontrolled fixed roof tank. The storage tanks are internal floating roof tanks. Therefore, these tanks are not subject to the requirements of this section.

Section 6.3 outlines recordkeeping requirements and requires accurate record retention for a period of five years. Compliance is assured by the permit condition # 43 on PTO N-758-4-4 and #41 on PTO -5-5, respectively:

Section 6.3.1 does not apply to floating roof tanks and fixed roof tanks with vapor recovery systems. Section 6.3.2 only applies to emergency standby tanks. Section 6.3.3 only applies to temporary tanks. Section 6.3.4 only applies to small producers. Therefore, the requirements for these sections are not applicable.

Section 6.3.5 requires the inspection reports of floating roof tanks to be submitted to the APCO within five calendar days after the inspection for tanks that failed. For tanks that demonstrated compliance the inspection reports do not need to be submitted but must remain on-site and made available upon request by the APCO. In addition, this section also outlines the required information. Compliance is assured by condition # 37 on PTOs N-758-4-4 and -5-5:

Section 6.3.6 requires submittal of TVP and API gravity records as required by Section 6.2; however, the tanks in this project are not subject to 6.2. Therefore, this section is not applicable.

Section 6.3.7 requires an operator to maintain records of the external floating roof or internal floating roof landing activities. Compliance is assured by condition # 41 on PTO N-758-4-4 and # 39 on PTO -5-5, respectively.

Continued compliance with the requirements of this rule is expected.

Permit Units N-758-6-2 and -14-3 (External Floating Roof Tanks):

Section 5.1 of this rule requires Group C vessels (capacity greater than 39,600 gallons) storing liquids with a TVP of greater than 1.5 psia but less than 11 psia to be equipped with a floating roof or have vapor control installed. The tanks, permit units N-758-6 and -14, are external floating roof tanks; therefore, the requirements of this section are satisfied.

Section 5.1.2 applies only to small producers and therefore is not applicable.

Section 5.1.3 requires all tanks to be leak-free, as defined in Sections 3.11, 3.17, and 3.18 of the rule. Compliance is assured by the following condition included as # 19 on PTOs N-758-6-2 and -14-3:

- {modified 2501} A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]

Section 5.2 states that the pressure-vacuum relief valve shall be set to within ten (10) percent of the maximum allowable working pressure of the tank. The pressure-vacuum relief valve shall be permanently labeled with the operating pressure settings. The pressure-vacuum relief valve shall be properly installed and maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve set pressure..

Compliance is assured by the following condition included as # 18 on PTOs N-758-6-2 and -14-3:

- {modified 2768} The tank shall be in a leak-free condition. The pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623]

Section 5.3.1 applies to external floating roof tanks and requires 1) a cover that rests on the surface of the liquid, 2) primary and secondary seals, 3) and the roof to be floating at all times except during initial and subsequent fills until the roof is lifted off the leg supports.

The following conditions ensure compliance:

- {modified 2504} 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 as the secondary seal. [District Rule 4623 and 40 CFR 63.11087(a)]
- {modified 2505} 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 and 40 CFR 63.11087(a)]

These conditions have been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-6-2	4 and 5
N-758-14-3	4 and 5

Section 5.3.2.1 provides specifications for welded external floating roof tanks with primary metallic-shoe type seals. The following conditions ensure compliance.

- {modified 2506} Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623]
- {2507} 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]
- Accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm² per meter (10.01 in² per foot) of tank diameter, and the width of any gap shall not exceed 3.81 cm (1.5 inches). [40 CFR 63.11087(c)]
- {2508} 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]
- {2509} No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623]
- {modified 2740} Accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm² per meter (1.0 in² per foot) of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm (1/2 inch). [District Rule 4623 and 40 CFR 63.11087(c)]
- If the primary seal used is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 61 cm (24 inches) above the stored liquid surface. [District Rule 4623 and 40 CFR 63.11087(c)]
- {2513} 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]
- {2514} 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 and 40 CFR 63.11087(c)]
- {2515} 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]

- {2516} The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623]

These conditions have been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-6-2	6 thru 16
N-758-14-3	6 thru 16

Section 5.3.2.2 provides specifications for riveted external floating roof tanks. Since these tanks (permit units N-758-6 and 14) are not riveted tanks, this section is not applicable.

Section 5.3.2.3 provides specifications for tanks with resilient toroid seals. Since these tanks (permit units N-758-6 and 14) do not contain resilient toroid seals, this section is not applicable.

Section 5.3.2.4 provides specifications for approved alternative seals. Since these tanks (permit units N-758-6 and 14) do not have any alternative seals, this section is not applicable.

Section 5.4 provides specifications for internal floating roof tanks. Since these tanks (permit units N-758-6 and 14) are external floating roof tanks, this section is not applicable.

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. The tank shall be equipped with a cover, seal or lid. Compliance is assured by the following condition included as # 17 on PTOs N-758-6-2 and -14-3:

- {modified 2517} All openings in the roof used for sampling and gauging, except pressure-vacuum (P/V) relief valve, 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]

Section 5.5.2.1 outlines requirements for internal floating roof deck fittings. Since these tanks (permit units N-758-6 and 14) are external floating roof tanks, this section is not applicable.

Section 5.5.2.2 outlines requirements for external floating roof deck fittings. The following conditions ensure compliance:

- {modified 2518} 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 and 40 CFR 63.11087(a)]
- {modified 2519} 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 and 40 CFR 63.11087(a)]
- {modified 2520} 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 and 40 CFR 63.11087(a)]
- {modified 2521} 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 and 40 CFR 63.11087(a)]
- {modified 2522} 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 and 40 CFR 63.11087(a)]
- {2523} 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]

These conditions have been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-6-2	20 thru 25
N-758-14-3	20 thru 25

Section 5.5.2.3 outlines requirements for solid guidepoles. The following conditions ensure compliance.

- {2524} All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623]
- {2525} 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]
- {2526} 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]

These conditions have been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-6-2	26 thru 28
N-758-14-3	26 thru 28

Section 5.5.2.4 outlines requirements for slotted guidepoles. The following conditions ensure compliance.

- {2527} 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]
- {2528} 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]

These conditions have been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-6-2	29 and 30
N-758-14-3	29 and 30

Section 5.6 outlines vapor recovery system requirements for fixed roof tanks. Since the tanks (permit units N-758-6 and -14) are not fixed roof tanks, this section is not applicable.

Section 5.7 outlines the provisions for voluntary tank preventative inspection and maintenance, and tank interior cleaning program. The operator has not elected to participate in this program; therefore, no conditions are required to ensure compliance.

Section 6.1.1 requires the operator of external floating roof tanks to make the primary seal envelope available for unobstructed inspection by the APCO on an annual basis. A minimum of eight locations is required for riveted tanks with toroid-type seals, and a minimum of four locations is required for other cases. Since the tank involved in this project is a welded tank, compliance is assured by the following condition included as # 31 on PTOs N-758-6-2 and -14-3:

- {2529} 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]

Section 6.1.3.1 requires external floating roof tanks to be inspected at least once every 12 months, or every time a tank is emptied or degassed. The actual gap measurements must be recorded and submitted to the APCO as specified in Section 6.3.5. Compliance is assured by the following condition included as # 32 on PTOs N-758-6-2 and -14-3:

- {2751} Operator shall perform gap measurements on primary and secondary seals within 60 days of the initial fill 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 and 40 CFR 63.11087(c)]

Section 6.1.3.1.2 requires that the operator 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 48 hours after the tank roof is re-floated. Compliance is assured by the following condition included as # 44 on PTOs N-758-6-2 and -14-3:

- {modified 2754} The permittee shall inspect the primary and secondary seals for compliance with the requirements of Rule 4623 every time this tank is emptied or degassed. 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; 40 CFR 63.11087(c)]

Section 6.1.4 states inspection requirements for internal floating roof tanks. Since the tanks (permit units N-758-6 and -14) are not internal floating roof tanks, this section is not applicable.

Section 6.2 requires TVP and API gravity testing of stored organic liquid in uncontrolled fixed roof tank. The storage tanks are external floating roof tanks. Therefore, these tanks are not subject to the requirements of this section.

Section 6.3 outlines recordkeeping requirements and requires accurate record retention for a period of five years. Compliance is assured by the following condition included as # 48 on PTOs N-758-6-2 and -14-3:

- {modified 2490} The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 and 40 CFR 63.11094(a)]

Section 6.3.1 does not apply to floating roof tanks and fixed roof tanks with vapor recovery systems. Section 6.3.2 only applies to emergency standby tanks. Section 6.3.3 only applies to temporary tanks. Section 6.3.4 only applies to small producers. Therefore, the requirements for these sections are not applicable.

Section 6.3.5 requires the inspection reports of floating roof tanks to be submitted to the APCO within five calendar days after the inspection for tanks that failed. For tanks that demonstrated compliance the inspection reports do not need to be submitted but must remain on-site and made available upon request by the APCO. In addition, this section also outlines the required information.

Compliance is assured by the following condition included as # 45 on PTOs N-758-6-2 and -14-3:

- {2532} 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]

Section 6.3.6 requires submittal of TVP and API gravity records as required by Section 6.2; however, the tanks in this project are not subject to 6.2. Therefore, this section is not applicable.

Section 6.3.7 requires the operator to maintain the records of floating roof landing activities pursuant to Section 5.3.1.3 and 5.4.3.

Compliance is assured by the following condition included as # 46 on PTOs N-758-6-2 and -14-3:

- {2533} 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]

Continued compliance with the requirements of this rule is expected.

Permit Units N-758-1-1, -2-1, -3-1, and -7-1 (Fixed Roof Storage Tanks Connected to Vapor Recovery):

Section 5.1.1 General VOC Control System Requirements

Except for small producers who are required to comply with the VOC control system requirements in Section 5.1.2, an operator shall not place, hold, or store organic liquid in any tank unless such tank is equipped with a VOC control system identified in Table 1. The specifications for the VOC control system are described in Sections 5.2, 5.3, 5.4, 5.5, and 5.6.

Tanks N-758-1, -3, and -7 with capacities of 56,994 gallons, 630,000 gallons, and 399,000 gallons, respectively, fall under Group C of Table 1 > 39,600 gallons in capacity and TVP >1.5 psia but less than 11 psia. Whereas tank N-758-2 (24,360 gallons) falls under Group B of Table 1 > 19,800 to 39,600 gallons in capacity and TVP >1.5 psia but less than 11 psia. Thus all of these tanks satisfy the requirement of a vapor control system (for fixed-roof tanks).

The following conditions ensure compliance with leak-free requirements of Section 5.1.3. This condition has been included as # 4 on PTOs N-758-1-1, -2-1, -3-1, and -7-1:

- {modified 2501} A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]

Section 5.2 (specifications for pressure-valve settings) is not applicable to tanks connected to a vapor control system. Sections 5.3 through 5.5 (specifications for external floating roof tanks, internal floating roof tanks, and floating roof deck requirements) are not applicable to fixed roof tanks.

Section 5.6.1 requires fixed roof tanks to be fully enclosed and maintained in a leak free condition. An APCO-approved vapor recovery system shall consist of a closed 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:

- 5.6.1.1 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
- 5.6.1.2 A VOC control device that reduces the inlet VOC emissions by at least 95 percent by weight as determined by the test method specified in Section 6.4.6.

Compliance is assured by the following condition included as # 1 on PTOs N-758-1-1, -2-1, -3-1, and -7-1:

- The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all the VOCs from the storage tank. The vapor recovery system shall be maintained in a leak-free condition. Collected vapors shall be directed to approved control devices with a destruction efficiency of at least 95% by weight as determined by the test method specified in District Rule 4623. [District Rule 4623]

Section 5.6.2 requires any tank gauging or sampling device on a tank vented to the vapor recovery system to be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. Compliance is assured by the following condition included as # 3 on PTOs N-758-1-1, -2-1, -3-1, and -7-1:

- {modified 2502} 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]

Section 5.6.3 requires all piping, valves, and fittings to be constructed and maintained in a leak free condition. Compliance is assured by the following condition which is included as # 2 on PTOs N-758-1-1, -2-1, -3-1, and -7-1:

- {modified 2499} All piping valves and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623]

Section 5.7 outlines the provisions for voluntary tank preventative inspection and maintenance, and tank interior cleaning program. The operator has not elected to participate in this program; therefore, no conditions are required to ensure compliance.

Section 6.1 is applicable to floating roof tanks. Therefore, this section is not applicable to these tanks.

Section 6.2 requires TVP and API gravity testing of stored organic liquid in uncontrolled fixed roof tank. The storage tanks are controlled fixed roof tanks controlled by a vapor recovery system. Therefore, these tanks are not subject to the requirements of this section.

Section 6.3 outlines recordkeeping requirements and requires accurate record retention for a period of five years. Compliance is assured by the following condition included as # 8 on PTOs N-758-1-1, -2-1, -3-1, and -7-1:

- {modified 2490} The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 and 40 CFR 63.11094(a)]

Section 6.3.1 does not apply to floating roof tanks and fixed roof tanks with vapor recovery systems. Section 6.3.2 only applies to emergency standby tanks. Section 6.3.3 only applies to temporary tanks. Section 6.3.4 only applies to small producers. Section 6.3.5 only applies to floating roof tanks. 6.3.6 is not applicable, since tanks are not required API gravity and TVP testing. Therefore, the requirements for these sections are not applicable.

Section 6.4 refers to the required test methods. Since these tanks are not subject to periodic API gravity and TVP testing requirements, this section is not applicable.

Compliance with the requirements of this rule is expected.

7. Rule 4624 Transfer of Organic Liquid

Loading Racks (Permits N-758-9 and -10) and Vapor Recovery System (Permit N-758-13):

The purpose of this rule is to limit VOC emissions from the transfer of organic liquids. This rule applies 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.

Loading rack #1 (N-758-9) and loading rack #2 (N-758-10) are both served by the vapor recovery system listed in permit unit N-758-13. Emissions from both of the loading racks are not limited in permits N-758-9 or -10, but are limited by the conditions listed on the vapor recovery system permit. The vapor recovery system is authorized to handle gasoline vapors from a total of no more than 895,000 gallons of gasoline throughput per day, and no more than 123,733,750 gallons of gasoline throughput per year. Since this facility transfers more than 20,000 gallons of organic liquids per day, this facility is considered a Class 1 Organic Liquid Transfer Facility and the bulk loading rack operations (permit units N-758-9 and -10) and vapor recovery system (permit unit N-758-13) are subject to the requirements of this Rule.

Section 5.1 requires emissions from the transfer operation to not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred and to use one of the following systems:

1. Use a bottom loaded organic liquid loading operation.
2. Use 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.

This facility utilizes a bottom loaded system (permits N-758-9 and -10) and utilizes a vapor collection system (permit N-758-13) which meets the 0.08 lb/1000 gallons emission limit. The following conditions ensure compliance with these requirements:

N-758-9-1:

- All vapors displaced during truck loading shall be vented to the vapor recovery system (N-758-13). [District Rule 4624]

N-758-10-2:

- All vapors displaced during truck loading shall be vented to the vapor recovery system (N-758-13). [District Rules 2201 and 4624]

N-758-13-8:

- Vapor return hose(s) shall connect displaced vapors from the truck to the vapor control system whenever tank truck, trailer, or car is loading organic liquid. [District Rules 2201 and 4624]
- Vapor return hose(s) and connections between the tanker truck, trailer, or car and the vapor control system shall be leak-free. [District Rules 2201 and 4624]
- The facility shall be equipped with bottom loading and a vapor collection and control system such that the VOC emissions shall not exceed 0.08 pounds per 1,000 gallons of organic liquid loaded. [District Rules 2201 and 4624]
- The John Zink vapor processing unit is authorized to handle gasoline vapors from a total of no more than 895,000 gallons of gasoline throughput per day, nor 123,733,750 gallons of gasoline throughput per year. [District Rules 2201 and 4624]

These conditions have been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-9-1	1
N-758-10-2	1
N-758-13-8	7 thru 10

Section 5.2 applies to Class 2 organic liquid transfer facilities. This facility is Class 1; therefore, Section 5.2 is not applicable.

Section 5.3 states “A transfer operation utilizing a closed VOC emission control system or utilizing a container that meets the control requirements of Rule 4623 (Storage of Organic Liquids) to meet the emission control requirements of this rule shall demonstrate compliance with Sections 5.1 and 5.2 by complying with the leak inspection requirements of Section 5.9.” See Section 5.9 below for leak inspection requirements.

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. Compliance with this requirement is already enforced by the following permit condition on the vapor recovery system permit (N-758-13-8, condition 2); therefore, this requirement will not be included on the bulk loading rack permits (N-758-9-1 and -10-2):

- The vapor collection and control system shall operate such that the pressure in the delivery tank being loaded shall not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624]

Section 5.5 requires 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 to be filled only at transfer facilities satisfying Sections 5.1, 5.2, or 5.4, as applicable. The displaced vapors from the tankers being filled will be vented to the vapor control system. Compliance with this requirement is assured by permit conditions stated under Sections 5.1 and 5.4 discussions above.

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. The following condition ensures compliance with this requirement:

- The transfer rack and vapor collection equipment shall be maintained and operated such that there are no leaks and is no excess organic liquid drainage during disconnections. [District Rule 4624]
- A leak is defined as the dripping of VOC-containing liquid at a rate of more than 3 drops per minute, or the detection of any gaseous or vapor emissions with a concentration of VOC greater than 10,000 ppmv as methane above a background when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 4624]
- 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]

These conditions have been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-9-1	4, 5, 6
N-758-10-2	4, 5, 6
N-758-13-8	3, 26, 27

Section 5.8 pertains to the transfer of liquefied petroleum gas (LPG). This facility does not involve the transfer of LPG; therefore, Section 5.8 is not applicable.

Section 5.9.1 states that 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. The following condition ensures compliance with this requirement:

- The operator shall inspect the vapor collection system, the vapor disposal system, and each transfer rack handling organic liquids for leaks at least once every calendar quarter using EPA Method 21. [District Rule 4624]

This condition has been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-9-1	7
N-758-10-2	7
N-758-13-8	28

Section 5.9.3 states that all equipment that are found leaking shall 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. The following condition ensures compliance with this requirement:

- All leaking components shall be repaired or replaced within 72 hours of discovery. 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 replaced equipment shall be re-inspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624]

This condition has been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-9-1	9
N-758-10-2	9
N-758-13-8	29

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. The following condition ensures compliance with this requirement:

- The operator may apply for a written approval from the APCO to change the EPA Method 21 leak 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]

This condition has been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-9-1	10
N-758-10-2	10
N-758-13-8	30

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. The following condition ensures compliance with this requirement:

N-758-9-1:

- The owner or operator shall maintain a log book for each leak that is detected that contains the following information: 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 if the leak is not repaired within 15 days; and 7) the date of successful repair of the leak. [District Rule 4624 and 40 CFR 63.11094(e)]
- The permittee shall keep records of the daily gasoline throughput in gallons. [District Rule 4624]

- All records shall be maintained for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 4624; 40 CFR 63.11094(a)]

N-758-10-2:

- The owner or operator shall maintain a log book for each leak that is detected that contains the following information: 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 if the leak is not repaired within 15 days; and 7) the date of successful repair of the leak. [District Rule 4624 and 40 CFR 63.11094(e)]
- The permittee shall keep records of the daily gasoline throughput, the cumulative annual gasoline throughput, in gallons. [District Rules 2201 and 4624]
- All records shall be maintained for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4624; 40 CFR 63.11094(a)]

N-758-13-8:

- The permittee shall maintain records of the daily gasoline throughput, cumulative annual gasoline throughput, in gallons, and results of required leak inspections. These records shall be retained for a minimum of five years and shall be made available for District inspection upon request. [District Rules 2201 and 4624]

These conditions have been included on the relevant permits as listed in the table below:

Permit Unit	Permit Condition Number
N-758-9-1	12, 13, 14
N-758-10-2	12, 13, 14
N-758-13-8	33

8. **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**

§60.110b: Applicability and designation of affected facility

This subpart applies to each storage vessel with a capacity greater than 75 m³ that is used to store a volatile organic liquid for which construction, reconstruction, or modification is commenced after July 23, 1984. A storage vessel may be exempt from the requirements of this subpart as long as it qualifies §60.110b(b) or §60.110b(d), or meet alternate means of compliance in §60.110b(e).

Permit Units N-758-1-1, -2-1, -3-1, -5-5, -6-2, -7-1, and -14-3:

The storage capacity of each tank is greater than 75 m³ (19,813 gal). These tanks do not fit into §60.110b(b), §60.110b(d), or §60.110b(e). Based on the documents provided by Equilon (see Appendix F), these storage tanks were installed before July 23, 1984; therefore, these storage tanks are not subject to the requirements of this subpart.

Permit Unit N-758-15-0 (300 Gallon Diesel Additive Storage Tank):

§60.110b(a) states that except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m³) (19,813 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984. Since the tank (permit unit N-758-15) has a capacity of 300 gallon and was installed after July 23, 1984, Subpart Kb requirements are not applicable to it.

Permit Unit N-758-4-4 (Internal Floating Roof Tank):

§60.110b: Applicability and designation of affected facility

The storage capacity of this tank is greater than 75 m³ (19,813 gal). This tank does not fit into §60.110b(b), §60.110b(d), or §60.110b(e). This storage tank was installed after July 23, 1984; therefore, this storage tank is subject to the requirements of this subpart.

§60.112b: Standard for volatile organic compounds (VOC)

This section requires to equip each storage vessel with systems listed in §60.112b(a)(1) (a fixed roof in combination with an internal floating roof) or §60.112b(a)(2) (an external floating roof) or 60.112b(a)(3) (a closed vent system and control device) or 60.112b(a)(4) (a system equivalent to (a)(1), (a)(2), or (a)(3)).

This storage tank is internal floating roof tank. Therefore, it must meet the requirements in §60.112b(a)(1).

§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.

Compliance is assured by the following condition included as # 8 on PTO N-758-4-4:

- The floating roof shall be floating 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 processes of filling or emptying and refilling the tank 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 the roof on its legs. [District Rule 4623 and 40 CFR 60.112b(a)(1)(i) and 63.11087(a)]

§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).

This tank is equipped with a mechanical shoe seal listed in §60.112b(a)(1)(ii)(C). The equipment description of the permit includes mechanical shoe seal. Therefore, the compliance is expected with this section.

§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.

Compliance is assured by the following condition included as # 23 PTO N-758-4-4:

- 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 and 40 CFR 60.112b(a)(1)(iii) and 63.11087(a)]

§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.

Compliance is assured by the following condition included as # 24 PTO N-758-4-4:

- 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. [District Rule 4623; 40 CFR 60.112b(a)(1)(iv) and 63.11087(a)]

§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. Compliance is assured by the following condition included as # 25 on PTO N-758-4-4:

- 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. [District Rule 4623; 40 CFR 60.112b(a)(1)(v) and 63.11087(a)]

§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. Compliance is assured by the following condition included as # 26 on PTO N-758-4-4:

- 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. [District Rule 4623; 40 CFR 60.112b(a)(1)(vi) and 63.11087(a)]

§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. Compliance is assured by the following condition included as # 27 on PTO N-758-4-4:

- 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. The fabric cover must be impermeable. [District Rule 4623 and 40 CFR 60.112b(a)(1)(vii) and 63.11087(a)]

§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. Compliance is assured by the following condition included as # 28 on PTO N-758-4-4:

- 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. The fabric sleeve must be impermeable. [District Rule 4623 and 40 CFR 60.112b(a)(1)(viii) and 63.11087(a)]

§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 is assured by the following condition included as # 29 on PTO N-758-4-4:

- 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 63.11087(a)]

§60.113b: Testing and procedures

§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.

Compliance is assured by the following condition included as # 32 on PTO N-758-4-4:

- 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; 40 CFR 60.113b(a)(1) and 63.11092(e)(1)]

§60.113b(a)(2) requires that the owner or operator shall visually inspect the internal floating roof and the primary seal, or the secondary and 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 with 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.

Compliance is assured by the following conditions included as # 33 and 35 respectively on PTO N-758-4-4:

- The permittee shall visually inspect, through the manholes, roof hatches, or other opening 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; 40 CFR 60.113b(a)(2) and 63.11092(e)(1)]
- 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 63.11092(e)(1)]

§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 is assured by the following condition included as # 36 on PTO N-758-4-4:

- The permittee shall notify the District in writing at least 30 days prior to conducting the visual inspection of the storage vessel, so the District can arrange an observer. [40 CFR 60.113b(a)(5) and 63.11092(e)(1)]

§60.115b: Reporting and recordkeeping requirements

§60.115b(a)(1) requires that the owner or operator shall furnish the Administrator with a report that describes the control equipment and certifies that the control equipment meets the specifications of §60.112b(a)(1) and §60.113b(a)(1). This report shall be an attachment to the notification required by §60.7(a)(3) (i.e. initial startup notification).

The reports required are a part of the initial startup notification followed after the installation of primary mechanical shoe and secondary wiper seals. Since these tanks are already equipped with the seals, startup notification may have already been submitted to the District. Therefore, no additional reports are required.

§60.115b(a)(2) requires that the owner or operator shall keep a record of each inspection performed as required by §60.113b(a)(1) and (a)(2). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

§60.115b(a)(3) requires that the owner or operator shall furnish a report to the Administrator within 30 days if any of the condition described in §60.113b(a)(2) are detected during annual visual inspection required by §60.113 b(a)(2). The report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of the defect and date the repair was made.

Compliance is assured by the following condition included as # 37 on PTO N-758-4-4:

- The 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; 40 CFR 60.115b(a)(2), 60.115b(a)(3), and 63.11094(a)]

§60.116b: Monitoring of operations

§60.116b(a) requires that the owner or operator shall keep copies of all records required by this section, except for the record required by paragraph (b) of this section, for at least 2 years. However, Rule 4623, requires to keep all records to be kept for a period of at least five year. Compliance is assured by the following condition included as # 43 on PTO N-758-4-4:

- {modified 2490} The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rules 2201 and 4623, and 40 CFR 60.116b(a)]

§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. Compliance is assured by the following condition included as # 38 on PTO N-758-4-4:

- The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR 60.116b(b)]

§60.116b(c) requires that except as provided in paragraphs (f) and (g) of this section, the owner or operator of each storage vessel either with a design capacity greater than or equal to 151 m³ (39,890 gallons) storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa (0.5 psia) or with a design capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure greater than or equal to 15.0 kPa shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. Compliance is assured by the following condition included as # 39 on PTO N-758-4-4:

- 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. [District Rule 2201 and 40 CFR 60.116b(c)]

§60.116b(e)(1) refers to true vapor pressure requirements for vessels operated above or below ambient temperatures. Since this tank is operated at ambient temperature, this section is not applicable.

§60.116b(e)(2)(i) requires that for crude oil or refined petroleum products the vapor pressure may be obtained by the available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see §60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). Compliance is assured by the following condition included as # 40 on PTO N-758-4-4:

- {2623} Maximum true vapor pressure, for crude oil or refined petroleum products, may be determined from nomographs contained in API Bulletin 2517, by using the typical Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product, unless the APCO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.116b(e)(2)(i)]

§60.116b(e)(2)(ii) requires that the true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

Since this tank does not store crude oil, requirements of this section are not applicable.

9. 40 CFR Part 60 Subpart XX – Standards of Performance for Bulk Gasoline Terminals

This subpart is applicable 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. According to documents submitted by Equilon (see Appendix F), the loading racks, currently permitted as N-758-9 and -10, were constructed before December 17, 1980; therefore, this Subpart is not applicable and no further discussion is required.

10.40 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-1111664, the total VOC emission from this facility is calculated to 46,574 pounds per year. The total HAPs from this facility is then calculated to:

$$\begin{aligned} \text{Total HAPs} &= 46,574 \text{ lb-VOC/yr} \times 0.11 \text{ lb-HAPs/lb-VOC} \\ &= 5,123 \text{ lb-HAPs/yr (equivalent to 2.56 tons/yr)} \end{aligned}$$

The total HAPs emissions, 2.56 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.

11.40 CFR Part 63 Subpart BBBBBB – Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

This subpart establishes emission limitations and management practices for HAPs emitted from “area source” (i.e., not a Major HAP source) gasoline distribution bulk terminals, bulk plants and pipeline facilities. This facility is a gasoline distribution bulk terminal, and is an “area source” for HAPs. Therefore, this facility is subject to the requirements of this subpart. The affected units include: gasoline storage tanks, gasoline loading rack, and all equipment in gasoline service (valves, pumps, connectors etc.).

§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 vapor recovery system (permit unit N-758-13-8) is authorized to handle gasoline vapors from a total of no more than 895,000 gallons of gasoline throughput per day. Since this facility transfers more than 20,000 gallons of organic liquids per day, this facility is subject to the requirements of this subpart.

§63.11082 Affected source covered by this subpart

N-758-1, -2, -3, -4, -5, -6, -7, -9, -10, -11, -12, -13, and -14

§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 unit N-758-15, are required to comply with the requirements of this subpart.

N-758-15-1

This existing 300 gallon aboveground storage tank is used to store diesel additive 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.

§63.11083 Compliance Date of this subpart

§63.11083(b) states that an existing affected source must comply with the standards in this subpart no later than January 10, 2011. Therefore, this facility must be currently in compliance with this subpart.

§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-758-12

Since this tank is used to store gasoline additives only, requirements of this Subpart are not applicable to this tank.

N-758-1, -2, -3, -4, -5, -6, -7, and -14 (Gasoline Storage Tanks)

The capacity of each of the gasoline storage tanks under these permit units is greater than 75 cubic meters (19,813 gallon). Therefore, these gasoline storage tanks must meet the requirements listed under §63.11100, Table 1, item 2, as follows:

- (a) Reduce emissions of total organic HAP or TOC by 95% (by weight) with a closed vent system and control device, as specified in § 60.112b(a)(3) of this chapter; or
- (b) 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
- (c) 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
- (d) 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-758-4 and N-758-5 (Internal Floating Roof Tanks)

These internal floating roof storage tanks are equipped with mechanical shoe primary seals and secondary wiper seals 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-758-4-4 and -5-5	8, 23 through 29

§63.11087(c) requires the owner or operator to perform testing and monitoring specified in §63.11092(e)(1) through (e)(3).

§63.11092(e)(1) requires the owner or operator of internal floating roof tanks to perform inspections of internal floating roof gasoline storage tank per §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-758-4-4 and -5-5	32, 33, 35, 36

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

§63.11093 states that initial notification requirements of this Subpart. As previously stated in District project N-1111664, pursuant to the facility, the initial notification was submitted to EPA by the dates required in this Subpart. Therefore, this requirement has already been satisfied.

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

§63.11094(a) requires the owner or operator of internal floating roof tanks to keep records as specified in §60.115b(a). Similarly §63.11095(a)(1) requires the owner or operator of internal floating roof tanks to meet the reporting requirements as specified in §60.115b(a).

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-758-4-4 & -5-5	37

N-758-6 and N-758-14 (External Floating Roof Tanks)

§63.11087(a) requires these gasoline storage tanks to meet the emissions limit and management practices listed under §63.11100, Table 1, item 2 as follows:

(c) 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).

These external floating roof storage tanks are equipped with mechanical shoe primary seals and secondary wiper seals that meet the requirements according to §60.112(b)(a)(2).

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-758-6-2 and -14-3	4, 5, 20 through 24

§63.11087(c) requires the owner or operator to perform testing and monitoring specified in §63.11092(e)(1) through (e)(3).

§63.11092(e)(2) requires the owner or operator of external floating roof tanks to perform inspections of internal floating roof gasoline storage tanks per §60.113b(b).

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-758-6-2 and -14-3	8, 11, 12, 14, 32 through 40, 44

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

§63.11093 states that initial notification requirements of this Subpart. As previously stated in District project N-1111664, pursuant to the facility, the initial notification was submitted to EPA by the dates required in this Subpart. Therefore, this requirement has already been satisfied.

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

§63.11094(a) requires the owner or operator of external floating roof tanks to keep records as specified in §60.115b(a). Similarly §63.11095(a)(1) requires the owner or operator of external floating roof tanks to meet the reporting requirements as specified in §60.115b(b).

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

Permit Number	Permit Condition Number
N-758-6-2 and -14-3	41 through 43

N-758-1, -2, -3, and -7 (Fixed Roof Tanks Connected to Vapor Recovery)

§63.11087(a) requires these gasoline storage tanks to meet the emissions limit and management practices listed under §63.11100, Table 1, item 2 as follows:

- (a) Reduce emissions of total organic HAP or TOC by 95% (by weight) with a closed vent system and control device, as specified in § 60.112b(a)(3) of this chapter

These fixed roof storage tanks are connected to vapor recovery system (permit unit N-758-13) that meets the requirements according to §60.112b(a)(3).

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-758-1, -2, -3, and -7	1

§63.11087(c) requires the owner or operator to perform testing and monitoring specified in §63.11092(e)(1) through (e)(3).

§63.11092(e)(3) requires the owner or operator of a gasoline storage tank that is equipped with a closed vent system and control device, must conduct a performance test and determine a monitored operating parameter value in accordance with the requirements in paragraphs (a) through (d) of this section, except that the applicable level of control specified in paragraph (a)(2) of this section shall be a 95-percent

reduction in inlet total organic compounds (TOC) levels rather than 80 mg/l of gasoline loaded.

Sections 63.11092(a) through (d) are only applicable to loading racks. Therefore, the requirements of these sections will be discussed under loading racks permits discussion.

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

§63.11093 states that initial notification requirements of this Subpart. As previously stated in District project N-1111664, pursuant to the facility, the initial notification was submitted to EPA by the dates required in this Subpart. Therefore, this requirement has already been satisfied.

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

§63.11094(a) requires the owner or operator of fixed roof tanks connected to vapor recovery system to keep records as specified in §60.115b(c). Similarly §63.11095(a)(1) requires the owner or operator of fixed roof tanks to meet the reporting requirements as specified in §60.115b(c).

§60.115b(c) requires that after installing control equipment in accordance with §60.112b (a)(3) or (b)(1) (closed vent system and control device other than a flare), the owner or operator shall keep the following records.

- (1) A copy of the operating plan.
- (2) A record of the measured values of the parameters monitored in accordance with §60.113b(c)(2).

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 Conditions Number
N-758-1, -2, -3, and -7	7 and 8

§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-845-9 and 10

Loading rack #1 (N-758-9) and loading rack #2 (N-758-10) are both served by the vapor recovery system listed in permit unit N-758-13. Emissions from both of the loading racks are not limited in permits N-758-9 or -10, but are limited by the conditions listed on the vapor recovery system permit. The vapor recovery system is authorized to handle gasoline vapors from a total of no more than 895,000 gallons of gasoline throughput per day. Since this facility transfers more than 250,000 gallons of organic liquids per day, each of the loading rack permits is required to meet the emissions limit and management practices listed under §63.11100, Table 2, item 1, as follows.

- (a) Equip your loading rack(s) with a vapor collection system designed to collect the TOC vapors displaced from cargo tanks during product loading; and

The loading racks (permit units N-758-9 and -10) are served by a vapor collection system (permit unit N-758-13) that collects the TOC vapors displaced from cargo tanks during product loading. Therefore, compliance is expected with this requirement.

- (b) Reduce emissions of TOC to less than or equal to 80 mg/l of gasoline loaded into gasoline cargo tanks at the loading rack; and

$$\begin{aligned} \text{limit} &= 80 \text{ mg/liter} \times 1\text{g}/1000\text{mg} \times 1 \text{ lb}/453.6\text{g} \times 3.785 \text{ liters}/\text{gal} \times 1000 \\ &= 0.67 \text{ lb}/1000 \text{ gal.} \end{aligned}$$

The emission limit on the vapor recovery system permit (N-758-13) is 0.08 lb/1000 gal, which is more stringent and thus meets this requirement. The permit condition requiring compliance with this limit is already enforced by a permit limit on the vapor recovery system permit (N-758-13-8, condition 9); therefore, it will not be included on the bulk loading rack permits.

- (c) Design and operate the vapor collection system to prevent any TOC vapors collected at one loading rack or lane from passing through another loading rack or lane to the atmosphere; and

The loading racks are designed to prevent any TOC vapors collected at one loading rack or lane from passing to another loading rack or lane. Compliance with this requirement is expected.

- (d) Limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in § 60.502(e) through (j) of this chapter. For the purposes of this section, the term "tank truck" as used in § 60.502(e) through (j) of this chapter means "cargo tank" as defined in § 63.11100.

Compliance is assured by the following condition included as # 2 on PTOs N-758-9-1 and -10-2:

- Gasoline shall be loaded only into vapor tight tank trucks. [40 CFR 63.11088(a)]

§63.11088(b) requires that as an alternative for railcar cargo tanks to the requirements specified in Table 2 of this subpart, the operator may comply with the requirements of §63.422(e)

This section is not applicable since gasoline is loaded into "truck" cargo tanks not "railcar" cargo tanks. Therefore, no further discussion is necessary.

§63.11088(c) requires that the operator must comply with the requirements of this subpart by the applicable dates specified in §63.11083.

As discussed under §63.11083 above that this facility must be currently in compliance with this subpart.

§63.11088(d) requires that the operator must comply with the applicable testing and monitoring requirements specified in §63.11092.

§63.11092(a): This section requires to conduct a performance test to demonstrate compliance with 80 mg/l standard (0.66 lb/1,000 gal of product loaded).

The latest source test on 9/17/09 revealed that the VOCs were 0.059 lb per 1,000 gallon of gasoline loaded. The loading racks are certified to operate in a configuration to route the gasoline vapors from the cargo tanks to the carbon adsorption system via bladder tank. The racks will also be certified to vent the gasoline vapors directly into the carbon adsorption system once the source testing required under ATC N-758-13-5 is complete. The performance testing is required on annual basis.

§63.11092(b): This section requires to either establish a parameter value such as daily vacuum level monitoring, monthly VOC testing, and annual carbon activity or a CMS. The facility has proposed to install, calibrate, certify, operate, and maintain, according to the manufacturer's specification, a CMS capable of measuring organic compound concentrations while gasoline vapors are displaced to the carbon adsorption system. Thus, compliance is expected with this section.

§63.11092(c): This section requires that the owner or operator shall document the reasons for any change to the operating parameter established during initial performance testing. The facility has chosen to install CMS to measure VOC emissions rather than establishing an operating parameter (as mentioned in §63.11092(b)). Therefore, this section is not applicable to this project.

§63.11092(d): This section discusses requirements if the owner or operator chooses to establish an operating parameter. The facility has chosen to install CMS to measure VOC emissions rather than establishing an operating parameter (as mentioned in §63.11092(b)). Therefore, this section is not applicable to this project.

§63.11092(e): This section discusses requirements for the gasoline storage tanks. The scope of the project is limited to the loading rack. Therefore, no further discussion is necessary.

§63.11092(f): This section discusses annual certification test for gasoline cargo tanks. GARB certifies gasoline cargo tanks on annual basis. Therefore, compliance is expected with this section.

§63.11088(e) requires that the operator must comply with the applicable notification requirements specified in §63.11093.

§63.11093 states that initial notification requirements of this Subpart. As discussed in District project N-1111664, the facility already submitted the initial notification to EPA by the dates required in this Subpart. Therefore, this requirement has already been satisfied.

§63.11088(f) requires that the operator must keep records and submit reports as specified in §63.11094 and §63.11095.

The applicant will comply with the recordkeeping and reporting requirements specified in §63.11094 and §63.11095.

§63.11094 includes the following recordkeeping requirements for bulk loading operations:

63.11094(a) states that all records must be kept for at least five years. The following condition will be included on the bulk loading rack permits:

N-758-9-1:

- All records shall be maintained for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 4624; 40 CFR 63.11094(a)]

N-758-10-2:

- All records shall be maintained for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4624; 40 CFR 63.11094(a)]

63.11094(b)(2) states that the documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information:

- (i) *Name of test: Annual Certification Test—Method 27 or Periodic Railcar Bubble Leak Test Procedure.*
- (ii) *Cargo tank owner's name and address.*
- (iii) *Cargo tank identification number.*
- (iv) *Test location and date.*
- (v) *Tester name and signature.*
- (vi) *Witnessing inspector, if any: Name, signature, and affiliation.*
- (vii) *Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing.*
- (viii) *Test results: Test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition.*

Compliance is assured by the following condition included as # 3 on PTOs N-758-9-1 and -10-2:

- Documentation attesting to the vapor tightness of each truck loaded with gasoline shall be kept up-to-date. The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information: (i) name of test: annual certification test—Method 27 or periodic Railcar Bubble Leak Test procedure; (ii) cargo tank owner's name and address; (iii) cargo tank identification number; (iv) test location and date; (v) tester

name and signature; (vi) witnessing inspector, if any: name, signature, and affiliation; (vii) vapor tightness repair: nature of repair work and when performed in relation to vapor tightness testing; (viii) test results: test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition. [40 CFR 63.11094(b)]

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. Compliance is assured by the following condition included as # 11 on PTOs N-758-9-1 and -10-2:

- 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)]

§63.11094(e) requires that each owner or operator of an affected source subject to equipment leak inspections under § 63.11089 shall record in the log book for each leak that is detected the information specified in paragraphs (e)(1) through (7) of this section.

- (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 if the leak is not repaired within 15 days.
- (7) The date of successful repair of the leak.

Compliance with these requirements is assured by the following condition included as # 12 on PTOs N-758-9-1 and -10-2:

- The owner or operator shall maintain a log book for each leak that is detected that contains the following information: 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 if the leak is not repaired within 15 days; and 7) the date of successful repair of the leak. [District Rule 4624 and 40 CFR 63.11094(e)]

The remainder of the requirements listed in Section 63.11094 do not apply to the bulk loading racks.

§63.11095 includes the following reporting requirements for bulk loading operations:

§63.11095(a) requires the owner or operator to submit a semiannual compliance report that includes the following items that apply to bulk loading racks:

63.11095(a)(2) requires the operator to report each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility.

63.11095(a)(3) requires the operator to report the number of equipment leaks not repaired within 15 days after detection. The District Rule 4624 requires leaks to be repaired within 72 hours; therefore, 63.11095(a)(3) is not applicable.

Compliance is assured by the following condition included as # 15 on PTOs N-758-9-1 and -10-2:

- The owner/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)]

§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.

Compliance is assured by the following condition included as # 8 on PTOs N-758-9-1 and -10-2:

- Each calendar month, the vapor collection system, the vapor processing system and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for organic liquid and organic vapor leaks. For the purpose of this condition, detection methods incorporating sight, sound and smell are acceptable. [40 CFR 63.11089(a)]

§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.

Compliance is assured by the following condition included as # 11 on PTOs N-758-9-1 and -10-2:

- 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)]

§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.

The District Rule 4624 requires leaks to be repaired within 72 hours; therefore, the requirements of these sections are satisfied by more stringent requirement of District Rule 4624.

§63.11089(e) requires the owner or operator must comply with the requirements of this subpart by the applicable dates specified in §63.11083. As discussed previously the facility should already be in compliance.

§63.11089(f) requires the owner or operator must submit the applicable notifications as required under §63.11093. As discussed under §63.11083(c) and §63.11093, the facility is currently complying 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.

§63.11094(e) requires that each owner or operator of an affected source subject to equipment leak inspections under § 63.11089 shall record in the log book for each leak that is detected the information specified in paragraphs (e)(1) through (7) of this section.

- (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 if the leak is not repaired within 15 days.
- (7) The date of successful repair of the leak.

Compliance with these requirements is assured by the following condition included as # 12 on PTOs N-758-9-1 and -10-2:

- The owner or operator shall maintain a log book for each leak that is detected that contains the following information: 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 if the leak is not repaired within 15 days; and 7) the date of successful repair of the leak. [District Rule 4624 and 40 CFR 63.11094(e)]

Therefore, continuous compliance with the requirements of these sections is expected.

12.40 CFR Part 64, Compliance Assurance Monitoring (CAM)

§64.2 – Applicability

This section requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

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

Pollutant	Major Source Threshold (lb/year)
NO _x	20,000
SO _x	140,000
PM ₁₀	140,000
CO	200,000
VOC	20,000

- a. **N-758-1-1, -2-1, -3-1, and -7-1** (Fixed Roof Storage Tanks served by Vapor Recovery System)

These permits do not contain emission limits for VOC which is the only pollutant which would be emitted from these units. However, all VOC emissions from these units are routed to the vapor recovery system permit unit N-758-13 which is equipped with Continuous Monitoring System (CMS) for VOCs which meets the definition of a continuous compliance determination method of 40 CFR 64.1. Therefore, these units are exempt from CAM requirements.

- b. **N-758-4-4 and -5-5** (Internal Floating Roof Gasoline Storage Tanks)

These permit units have VOC emissions limits, but they are not equipped with any add-on control device. Therefore, these units are not subject to CAM requirements.

c. N-758-6-1 and -14-3 (External Floating Roof Gasoline Storage Tanks)

These permit units have VOC emissions limits, but they are not equipped with any add-on control device. Therefore, these units are not subject to CAM requirements.

d. N-758-9-1 and -10-2 (Loading Racks #1 and #2)

These permits do not contain emission limits for VOC which is the only pollutant which would be emitted from these units. However, all VOC emissions from these units are routed to the vapor recovery system permit unit N-758-13 which is equipped with Continuous Monitoring System (CMS) for VOCs which meets the definition of a continuous compliance determination method of 40 CFR 64.1. Therefore, these units are exempt from CAM requirements.

e. N-758-11-2 (Bulk Off-Loading Operation)

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

f. N-758-12-3 (Gasoline Additive Storage Tank)

This permit unit is not equipped with any add-on control device; therefore, this unit is not subject to CAM requirements.

g. N-758-13-8 (Vapor Recovery System)

The permit unit is already equipped with Continuous Monitoring System (CMS) for VOCs which meets the definition of a continuous compliance determination method of 40 CFR 64.1; therefore, this unit is exempt from CAM requirements.

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 Addressed by Model General Permit Templates

By using the model general permit template SJV-UM-0-3, the applicant has requested that a permit shield be issued for requirements addressed in the template. The basis for each permit shield is discussed in the Permit Shield Section V of Template SJV-UM-0-3. This permit shield is included in conditions 39 and 40 of the facility wide requirements N-758-0-2.

B. Requirements not Addressed by Model General Permit Templates

The applicant does not request a permit shield for the requirements not addressed by the general permit templates. No permit shield is being granted for the requirements not addressed by the general permit templates.

XI. PERMIT CONDITIONS

See Attachment B for initial Title V operating permits.

XII. ATTACHMENTS

ATTACHMENT A – DETAILED FACILITY PRINTOUT
ATTACHMENT B – INITIAL TITLE V PERMITS
ATTACHMENT C – PREVIOUS DISTRICT PERMITS
ATTACHMENT D – TEMPLATE QUALIFICATION FORM
ATTACHMENT E – FACILITY'S COMMENTS AND DISTRICT'S RESPONSES
ATTACHMENT F – FACILITY DOCUMENTS FOR EQUIPMENT INSTALLATION DATES

Attachment A

DETAILED FACILITY PRINTOUT

Detailed Facility Report
For Facility=758 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

EQUILON ENTERPRISES LLC	FAC #	N 758	TYPE:	TitleV	EXPIRE ON:	01/31/2017
ROUGH & READY ISLAND	STATUS:	A	TOXIC ID:	21136	AREA:	9 /
STOCKTON, CA 95203	TELEPHONE:	3108162016			INSP. DATE:	08/13

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-758-1-0	56,994 GALLON TANK	3020-05 D	1	185.00	185.00	A	1,357 BBL ABOVEGROUND GASOLINE STORAGE TANK #12 SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13)
N-758-2-0	24,360 GALLON TANK	3020-05 C	1	135.00	135.00	A	580 BBL ABOVEGROUND GASOLINE STORAGE TANK #13 SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13)
N-758-3-0	630,000 GALLON TANK	3020-05 F	1	301.00	301.00	A	15,000 BBL ABOVEGROUND GASOLINE STORAGE TANK #14 SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13)
N-758-4-3	504,000 GALLON TANK	3020-05 F	1	301.00	301.00	A	12,000 BBL ABOVEGROUND INTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL STORAGE TANK #19 WITH A PRIMARY MECHANICAL SHOE TYPE SEAL AND SECONDARY RIM-MOUNTED WIPER SEAL
N-758-5-4	415,212 GALLON TANK	3020-05 E	1	246.00	246.00	A	9,886 BBL WELDED INTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL STORAGE TANK (TANK #20) WITH A MECHANICAL SHOE PRIMARY SEAL AND A SECONDARY WIPER SEAL
N-758-6-1	898,800 GALLON TANK	3020-05 F	1	301.00	301.00	A	21,400 ABOVEGROUND EXTERNAL FLOATING ROOF GASOLINE STORAGE TANK #21
N-758-7-0	399,000 GALLON TANK	3020-05 E	1	246.00	246.00	A	9,500 BBL ABOVEGROUND GASOLINE STORAGE TANK #17 SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13)
N-758-9-0	MISCELLANEOUS	3020-06	1	105.00	105.00	A	BULK LOADING RACK
N-758-10-1	MISCELLANEOUS	3020-06	1	105.00	105.00	A	BULK LOADING RACK #2 WITH 4 GASOLINE LOADING ARMS, 2 DIESEL LOADING ARMS, AND 1 ETHANOL LOADING ARM
N-758-11-1	MISCELLANEOUS	3020-06	1	105.00	105.00	A	BULK OFF-LOADING OPERATION UTILIZED FOR GASOLINE OR ETHANOL OFF-LOADING (RECEIVING) LOCATED AT TRUCK LOADING LANE #3
N-758-12-2	10,000 GALLON TANK	3020-05 B	1	93.00	93.00	A	ONE 10,000 GALLON ABOVEGROUND GASOLINE ADDITIVE (PDP-4000) STORAGE TANK
N-758-13-7	63 BHP	3020-01 C	1	197.00	197.00	A	ONE JOHN ZINK VAPOR RECOVERY SYSTEM, CARBON ADSORPTION UNIT, MODEL AA1218715B AND VAPOR BLADDER TANK #16 IN THE VAPOR RECOVERY LINE BEFORE THE VAPOR RECOVERY SYSTEM
N-758-14-2	689,136 GALLON TANK	3020-05 F	1	301.00	301.00	A	16,408 BBL ABOVEGROUND WELDED EXTERNAL FLOATING ROOF GASOLINE STORAGE TANK (TANK #18) WITH A MECHANICAL SHOE TYPE PRIMARY SEAL AND A SECONDARY WIPE SEAL
N-758-15-0	300 gallons	3020-05 A	1	75.00	75.00	A	ONE 300 GALLON ABOVEGROUND DIESEL ADDITIVE STORAGE TANK

Number of Facilities Reported: 1

Attachment B

INITIAL TITLE V PERMITS



Permit to Operate

FACILITY: N-758

EXPIRATION DATE: 01/31/2017

LEGAL OWNER OR OPERATOR:

EQUILON ENTERPRISES LLC

MAILING ADDRESS:

20945 S WILMINGTON AVE

CARSON, CA 90810

FACILITY LOCATION:

ROUGH & READY ISLAND

STOCKTON, CA 95203

FACILITY DESCRIPTION:

BULK 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.

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Executive Director / APCO

David Warner

Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: N-758-0-2

EXPIRATION DATE: 01/31/2017

FACILITY-WIDE REQUIREMENTS

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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: EQUILON ENTERPRISES LLC

Location: ROUGH & READY ISLAND, STOCKTON, CA 95203

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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

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

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. On XXXXX, XX, 2013, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-1-1

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 56,994 GALLON ABOVEGROUND GASOLINE STORAGE TANK #12 SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all the VOCs from the storage tank. The vapor recovery system shall be maintained in a leak-free condition. Collected vapors shall be directed to approved control devices with a destruction efficiency of at least 95% by weight as determined by the test method specified in District Rule 4623. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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] Federally Enforceable Through Title V Permit
4. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
5. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline shall be submitted to the District. [District Rule 2080] Federally Enforceable Through Title V Permit
6. 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 2080] Federally Enforceable Through Title V Permit
7. The owner or operator shall keep the following records for the closed vent system and control device: 1) A copy of the operating plan; and 2) A record of the measured values of the parameters monitored in accordance with 40 CFR 60.113b(c)(2). [40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit
8. The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 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-758-2-1

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 24,360 GALLON ABOVEGROUND GASOLINE STORAGE TANK #13 SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all the VOCs from the storage tank. The vapor recovery system shall be maintained in a leak-free condition. Collected vapors shall be directed to approved control devices with a destruction efficiency of at least 95% by weight as determined by the test method specified in District Rule 4623. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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] Federally Enforceable Through Title V Permit
4. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
5. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline shall be submitted to the District. [District Rule 2080] Federally Enforceable Through Title V Permit
6. 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 2080] Federally Enforceable Through Title V Permit
7. The owner or operator shall keep the following records for the closed vent system and control device: 1) A copy of the operating plan; and 2) A record of the measured values of the parameters monitored in accordance with 40 CFR 60.113b(c)(2). [40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit
8. The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 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-758-3-1

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 630,000 GALLON ABOVEGROUND GASOLINE STORAGE TANK #14 SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all the VOCs from the storage tank. The vapor recovery system shall be maintained in a leak-free condition. Collected vapors shall be directed to approved control devices with a destruction efficiency of at least 95% by weight as determined by the test method specified in District Rule 4623. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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] Federally Enforceable Through Title V Permit
4. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
5. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline shall be submitted to the District. [District Rule 2080] Federally Enforceable Through Title V Permit
6. 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 2080] Federally Enforceable Through Title V Permit
7. The owner or operator shall keep the following records for the closed vent system and control device: 1) A copy of the operating plan; and 2) A record of the measured values of the parameters monitored in accordance with 40 CFR 60.113b(c)(2). [40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit
8. The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 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-758-4-4

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 504,000 GALLON (12,000 BBL) ABOVEGROUND INTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL STORAGE TANK #19 WITH A PRIMARY MECHANICAL SHOE TYPE SEAL AND SECONDARY RIM-MOUNTED WIPER SEAL

PERMIT UNIT REQUIREMENTS

1. VOC emissions from this tank shall not exceed 14.1 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Fugitive VOC from valves, flanges, connector, pump seals etc associated with this tank shall not exceed 0.2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The daily throughput of the organic liquid shall not exceed 504,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The monthly throughput of the organic liquid shall not exceed 1,250,000 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
5. True vapor pressure (TVP) of the liquid stored in this tank shall not exceed 8.7 psia. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall determine TVP and the temperature of the organic liquid stored on monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive VOC emissions from component leaks shall be calculated using component count and appropriate emission factors from "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-1b (Feb 1999) - Marketing Terminal. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The floating roof shall be floating 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 processes of filling or emptying and refilling the tank 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 the roof on its legs. [District Rule 4623; 40 CFR 60.112b(a)(1)(i) and 63.11087(a)] Federally Enforceable Through Title V Permit
9. No gap between the tank shell and the primary seal shall exceed one and a half (1-1/2) inches. [District Rule 4623] Federally Enforceable Through Title V Permit
10. 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] Federally Enforceable Through Title V Permit
11. 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] Federally Enforceable Through Title V Permit
12. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] 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.

13. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
14. 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] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. 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] Federally Enforceable Through Title V Permit
17. 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 and 40 CFR 60.113b(b)(4)(i)(B) and (ii)(C)] Federally Enforceable Through Title V Permit
18. The secondary seal shall allow easy insertion of probes of up to one and a half (1-1/2) inches in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
19. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
20. All openings in the roof used for sampling and gauging, except pressure-vacuum (P/V) relief valve, 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] Federally Enforceable Through Title V Permit
21. The tank shall be in a leak-free condition. The pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
22. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
23. 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; 40 CFR 60.112b(a)(1)(iii) and 63.11087(a)] Federally Enforceable Through Title V Permit
24. 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. [District Rule 4623; 40 CFR 60.112b(a)(1)(iv) and 63.11087(a)] Federally Enforceable Through Title V Permit
25. 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. [District Rule 4623; 40 CFR 60.112b(a)(1)(v) and 63.11087(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.

26. 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. [District Rule 4623; 40 CFR 60.112b(a)(1)(vi) and 63.11087(a)] Federally Enforceable Through Title V Permit
27. 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. The fabric cover must be impermeable. [District Rule 4623; 40 CFR 60.112b(a)(1)(vii) and 63.11087(a)] Federally Enforceable Through Title V Permit
28. 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. The fabric sleeve must be impermeable. [District Rule 4623; 40 CFR 60.112b(a)(1)(viii) and 63.11087(a)] Federally Enforceable Through Title V Permit
29. 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 63.11087(a)] Federally Enforceable Through Title V Permit
30. All solid sampling or gauging wells, and similar fixed projections through the floating roof such as anti-rotational pipe shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
31. 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 not exceed one-half (1/2) inch. [District Rule 4623] Federally Enforceable Through Title V Permit
32. 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; 40 CFR 60.113b(a)(1) and 63.11092(e)(1)] Federally Enforceable Through Title V Permit
33. The permittee shall visually inspect, through the manholes, roof hatches, or other opening 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; 40 CFR 60.113b(a)(2) and 63.11092(e)(1)] Federally Enforceable Through Title V Permit
34. 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] Federally Enforceable Through Title V Permit
35. 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 63.11092(e)(1)] Federally Enforceable Through Title V Permit
36. The permittee shall notify the District in writing at least 30 days prior to conducting the visual inspection of the storage vessel, so the District can arrange an observer. [40 CFR 60.113b(a)(5) and 63.11092(e)(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.

37. The 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; 40 CFR 60.115b(a)(2), 60.115b(a)(3), and 63.11094(a)] Federally Enforceable Through Title V Permit
38. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR 60.116b(b)] Federally Enforceable Through Title V Permit
39. 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. [District Rule 2201 and 40 CFR 60.116b(c)] Federally Enforceable Through Title V Permit
40. Maximum true vapor pressure, for crude oil or refined petroleum products, may be determined from nomographs contained in API Bulletin 2517, by using the typical Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average storage temperature of the stored product, unless the APCO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.116b(e)(2)(i)] Federally Enforceable Through Title V Permit
41. The permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Section 5.3.1.3 and 5.4.3. The records shall include information on the TVP, API gravity, and 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] Federally Enforceable Through Title V Permit
42. The permittee shall maintain records of daily and monthly organic liquid throughput in gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
43. The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rules 2201 and 4623, and 40 CFR 60.116b(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-758-5-5

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 415,212 GALLON (9,886 BBL) ABOVEGROUND WELDED INTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL STORAGE TANK (TANK #20) WITH A MECHANICAL SHOE PRIMARY SEAL AND A SECONDARY WIPER SEAL

PERMIT UNIT REQUIREMENTS

1. VOC emissions from this tank shall not exceed 13.8 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Fugitive VOC from valves, flanges, connector, pump seals etc associated with this tank shall not exceed 0.1 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The daily throughput of the organic liquid shall not exceed 415,212 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The monthly throughput of the organic liquid shall not exceed 1,483,848 gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
5. True vapor pressure (TVP) of the liquid stored in this tank shall not exceed 8.7 psia. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall determine TVP and the temperature of the organic liquid stored on monthly basis. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Fugitive VOC emissions from component leaks shall be calculated using component count and appropriate emission factors from "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-1b (Feb 1999) - Marketing Terminal. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The floating roof shall be floating 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 processes of filling or emptying and refilling the tank 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 the roof on its legs. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
9. No gap between the tank shell and the primary seal shall exceed one and a half (1-1/2) inches. [District Rule 4623] Federally Enforceable Through Title V Permit
10. 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] Federally Enforceable Through Title V Permit
11. 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] Federally Enforceable Through Title V Permit
12. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] 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.

13. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
14. 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] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. 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] Federally Enforceable Through Title V Permit
17. 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] Federally Enforceable Through Title V Permit
18. The secondary seal shall allow easy insertion of probes of up to one and a half (1-1/2) inches in width in order to measure gaps in the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
19. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
20. All openings in the roof used for sampling and gauging, except pressure-vacuum (P/V) relief valve, 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] Federally Enforceable Through Title V Permit
21. The tank shall be in a leak-free condition. The pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
22. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
23. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
24. 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. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
25. 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. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
26. 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. [District Rule 4623 and 40 CFR 63.11087(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.

27. 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. The fabric cover must be impermeable. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
28. 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. The fabric sleeve must be impermeable. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
29. Each penetration of the internal floating roof that allows for the passage of a ladder shall have a gasketed sliding cover. [40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
30. All slotted sampling or gauging wells, and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit
31. 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 not exceed one-eighth (1/8) inch. [District Rule 4623] Federally Enforceable Through Title V Permit
32. 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 and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
33. The permittee shall visually inspect, through the manholes, roof hatches, or other opening 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 and 40 CFR 63.11092(e)(1)] Federally Enforceable Through Title V Permit
34. 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] Federally Enforceable Through Title V Permit
35. When storing gasoline, 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 63.11092(e)(1)] Federally Enforceable Through Title V Permit
36. The permittee shall notify the District in writing at least 30 days prior to conducting the visual inspection of the storage vessel, so the District can arrange an observer. [40 CFR 63.11092(e)(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.

37. The 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, and 63.11094(a)] Federally Enforceable Through Title V Permit
38. 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. [District Rule 2201] Federally Enforceable Through Title V Permit
39. The permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Section 5.3.1.3 and 5.4.3. The records shall include information on the TVP, API gravity, and 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] Federally Enforceable Through Title V Permit
40. The permittee shall maintain records of daily and monthly organic liquid throughput in gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
41. The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rules 2201 and 4623, 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-758-6-2

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 898,800 GALLON (21,400 BBL) ABOVEGROUND EXTERNAL FLOATING ROOF GASOLINE STORAGE TANK #21

PERMIT UNIT REQUIREMENTS

1. A vapor recovery system shall be required if the true vapor pressure of the stored liquid equals or exceeds 11 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
2. Daily throughput for this tank shall not exceed 898,800 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Annual throughput for this tank shall not exceed 67,389,222 gallons per year based on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
4. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
5. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
6. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
7. 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] Federally Enforceable Through Title V Permit
8. Accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm² per meter (10.01 in² per foot) of tank diameter, and the width of any gap shall not exceed 3.81 cm (1.5 inches). [40CFR 63.11087(c)] Federally Enforceable Through Title V Permit
9. 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] Federally Enforceable Through Title V Permit
10. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
11. Accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm² per meter (1.0 in² per foot) of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm (1/2 inch). [District Rule 4623 and 40CFR 63.11087(c)] Federally Enforceable Through Title V Permit
12. If the primary seal used is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 61 cm (24 inches) above the stored liquid surface. [District Rule 4623 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.

13. 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] Federally Enforceable Through Title V Permit
14. 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 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
17. All openings in the roof used for sampling and gauging, except pressure-vacuum (P/V) relief valve, 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] Federally Enforceable Through Title V Permit
18. The tank shall be in a leak-free condition. The pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
19. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
20. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
21. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
22. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
23. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
24. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
25. 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] Federally Enforceable Through Title V Permit
26. All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

27. The 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] Federally Enforceable Through Title V Permit
28. 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] Federally Enforceable Through Title V Permit
29. 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] Federally Enforceable Through Title V Permit
30. 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] Federally Enforceable Through Title V Permit
31. 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] Federally Enforceable Through Title V Permit
32. Operator shall perform gap measurements on primary and secondary seals within 60 days of the initial fill 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 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
33. Operator shall also perform gap measurements on primary seals during hydrostatic testing of the vessel. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
34. If unit is out of service for a period of one year or more, subsequent refilling with gasoline shall be considered initial fill in accordance with the conditions of this permit. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
35. Operator shall determine gap widths and gap areas for compliance with 40 CFR 60.113b(b)(2) and (3) in the primary and secondary seals using the following procedure: 1) Measure seal gaps, at one or more floating roof levels when the roof is floating off roof leg supports; 2) Measure seal gaps around entire circumference of the tank in each place where a 0.32 cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the tank wall and measure the circumferential distance of each such location; 3) Total surface area of each gap shall be determined by using probes of various widths to accurately measure the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance; and 4) Add the gap surface area of each gap location for the primary seal and the secondary seal individually. Divide the sum for each seal by the nominal diameter of the tank. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
36. If the seals do not meet the required specifications of 40 CFR 60.113b(b)(4)(i) and (ii), operator shall repair or empty the storage vessel within 45 days of identification. [40CFR 63.11087(c)] Federally Enforceable Through Title V Permit
37. Operator shall notify the APCO 30 days in advance of any gap measurements required by 40 CFR 63.11092(e)(2) and 40 CFR 60.113b(b) to afford the APCO opportunity to have an observer present. [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.

38. After the tank has been emptied and degassed, if the external floating roof has defects, or the primary seal or secondary seal has holes, tears, or other openings in the seal or seal fabric, the operator shall repair the items as necessary so that none of these conditions exist before filling or refilling the storage vessel with gasoline. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
39. For all visual inspections required by 40 CFR 63.11092(e)(2), the operator shall notify the APCO in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the APCO the opportunity to inspect the storage vessel prior to refilling, except when notification is specifically allowed otherwise by this permit. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
40. If a visual inspection required by 40 CFR 63.11092(e)(2) is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall notify the APCO at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so it is received by the APCO at least 7 days prior to the refilling. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
41. Operator shall record the vessel on which the measurement was performed, date of the seal gap measurement, raw data obtained in the measurement process in accordance with the conditions of this permit. [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
42. Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements: the date of measurement, raw data obtained in the measurement process, and all such gap calculations as required by 40 CFR 63.11092(e)(2). [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
43. Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements that exceeded 40 CFR 60.113b(4) limits: the date of measurement, raw data obtained in the measurement process, all such gap calculations as required by 40 CFR 63.11092(e)(2), and the date the vessel was emptied or the repairs made and the date of repair. [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
44. The permittee shall inspect the primary and secondary seals for compliance with the requirements of Rule 4623 every time this tank is emptied or degassed. 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 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
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 Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
46. 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] Federally Enforceable Through Title V Permit
47. Permittee shall maintain cumulative records of annual gasoline throughput in gallons on a monthly basis. [District Rule 2080] Federally Enforceable Through Title V Permit
48. The permittee shall maintain all records required by this permit for a period of at least five years and shall make them readily available for District inspection upon request. [District Rule 4623 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-758-7-1

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 399,000 ABOVEGROUND GASOLINE STORAGE TANK #17 SERVED BY THE JOHN ZINC VAPOR RECOVERY SYSTEM (N-758-13)

PERMIT UNIT REQUIREMENTS

1. The tank shall be equipped with a vapor recovery system consisting of a closed vent system that collects all the VOCs from the storage tank. The vapor recovery system shall be maintained in a leak-free condition. Collected vapors shall be directed to approved control devices with a destruction efficiency of at least 95% by weight as determined by the test method specified in District Rule 4623. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
2. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] 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] Federally Enforceable Through Title V Permit
4. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
5. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline shall be submitted to the District. [District Rule 2080] Federally Enforceable Through Title V Permit
6. 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 2080] Federally Enforceable Through Title V Permit
7. The owner or operator shall keep the following records for the closed vent system and control device: 1) A copy of the operating plan; and 2) A record of the measured values of the parameters monitored in accordance with 40 CFR 60.113b(c)(2). [40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit
8. The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 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-758-9-1

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:
BULK LOADING RACK (LANE #1)

PERMIT UNIT REQUIREMENTS

1. All vapors displaced during truck loading shall be vented to the vapor recovery system (N-758-13). [District Rule 4624] Federally Enforceable Through Title V Permit
2. Gasoline shall be loaded only into vapor tight tank trucks. [40 CFR 63.11088(a)] Federally Enforceable Through Title V Permit
3. Documentation attesting to the vapor tightness of each truck loaded with gasoline shall be kept up-to-date. The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information: (i) name of test: annual certification test-Method 27 or periodic Railcar Bubble Leak Test procedure; (ii) cargo tank owner's name and address; (iii) cargo tank identification number; (iv) test location and date; (v) tester name and signature; (vi) witnessing inspector, if any: name, signature, and affiliation; (vii) vapor tightness repair: nature of repair work and when performed in relation to vapor tightness testing; (viii) test results: test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition. [40 CFR 63.11094(b)] Federally Enforceable Through Title V Permit
4. The transfer rack and vapor collection equipment shall be maintained and operated such that there are no leaks and such that there is no excess organic liquid drainage during disconnections. [District Rule 4624] Federally Enforceable Through Title V Permit
5. A leak is defined as the dripping of VOC-containing liquid at a rate of more than 3 drops per minute, or the detection of any gaseous or vapor emissions with a concentration of VOC greater than 10,000 ppmv as methane above a background when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 4624] Federally Enforceable Through Title V Permit
6. 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] Federally Enforceable Through Title V Permit
7. The operator shall inspect the vapor collection system, the vapor disposal system, and each transfer rack handling organic liquids for leaks at least once every calendar quarter using EPA Method 21. [District Rule 4624] Federally Enforceable Through Title V Permit
8. Each calendar month, the vapor collection system, the vapor processing system and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for organic liquid and organic vapor leaks. For the purpose of this condition, detection methods incorporating sight, sound and smell are acceptable. [40 CFR 3.11089(a)] Federally Enforceable Through Title V Permit
9. All leaking components shall be repaired or replaced within 72 hours of discovery. 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 replaced equipment shall be re-inspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624] 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 operator may apply for a written approval from the APCO to change the EPA Method 21 leak 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] Federally Enforceable Through Title V Permit
11. For monthly leak inspection, a log book shall be used and shall be signed by the owner or operator at the completion of each leak 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 63.11094(d)] Federally Enforceable Through Title V Permit
12. The owner or operator shall maintain a log book for each leak that is detected that contains the following information: 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 if the leak is not repaired within 15 days; and 7) the date of successful repair of the leak. [District Rule 4624 and 40 CFR 63.11094(e)] Federally Enforceable Through Title V Permit
13. The permittee shall keep records of the daily gasoline throughput in gallons. [District Rule 4624] Federally Enforceable Through Title V Permit
14. All records shall be maintained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 4624; 40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit
15. The owner/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)] 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-758-10-2

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

BULK LOADING RACK (LANE #2) WITH 4 GASOLINE LOADING ARMS, 2 DIESEL LOADING ARMS, AND 1 ETHANOL LOADING ARM

PERMIT UNIT REQUIREMENTS

1. All vapors displaced during truck loading shall be vented to the vapor recovery system (N-758-13). [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
2. Gasoline shall be loaded only into vapor tight tank trucks. [40 CFR 63.11088(a)] Federally Enforceable Through Title V Permit
3. Documentation attesting to the vapor tightness of each truck loaded with gasoline shall be kept up-to-date. The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information: (i) name of test: annual certification test-Method 27 or periodic Railcar Bubble Leak Test procedure; (ii) cargo tank owner's name and address; (iii) cargo tank identification number; (iv) test location and date; (v) tester name and signature; (vi) witnessing inspector, if any: name, signature, and affiliation; (vii) vapor tightness repair: nature of repair work and when performed in relation to vapor tightness testing; (viii) test results: test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition. [40 CFR 63.11094(b)] Federally Enforceable Through Title V Permit
4. The transfer rack and vapor collection equipment shall be maintained and operated such that there are no leaks and such that there is no excess organic liquid drainage during disconnections. [District Rule 4624] Federally Enforceable Through Title V Permit
5. A leak is defined as the dripping of VOC-containing liquid at a rate of more than 3 drops per minute, or the detection of any gaseous or vapor emissions with a concentration of VOC greater than 10,000 ppmv as methane above a background when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 4624] Federally Enforceable Through Title V Permit
6. 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] Federally Enforceable Through Title V Permit
7. The operator shall inspect the vapor collection system, the vapor disposal system, and each transfer rack handling organic liquids for leaks at least once every calendar quarter using EPA Method 21. [District Rule 4624] Federally Enforceable Through Title V Permit
8. Each calendar month, the vapor collection system, the vapor processing system and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for organic liquid and organic vapor leaks. For the purpose of this condition, detection methods incorporating sight, sound and smell are acceptable. [40 CFR 63.11089(a)] Federally Enforceable Through Title V Permit
9. All leaking components shall be repaired or replaced within 72 hours of discovery. 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 replaced equipment shall be re-inspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624] 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 operator may apply for a written approval from the APCO to change the EPA Method 21 leak 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] Federally Enforceable Through Title V Permit
11. For monthly leak inspection, a log book shall be used and shall be signed by the owner or operator at the completion of each leak 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 63.11094(d)] Federally Enforceable Through Title V Permit
12. The owner or operator shall maintain a log book for each leak that is detected that contains the following information: 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 if the leak is not repaired within 15 days; and 7) the date of successful repair of the leak. [District Rule 4624 and 40 CFR 63.11094(e)] Federally Enforceable Through Title V Permit
13. The permittee shall keep records of the daily gasoline throughput, the cumulative annual gasoline throughput, in gallons. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
14. All records shall be maintained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, 2201, and 4624; 40 CFR 63.11094(a)] Federally Enforceable Through Title V Permit
15. The owner/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)] 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-758-11-2

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

BULK OFF-LOADING OPERATION UTILIZED FOR GASOLINE OR ETHANOL OFF-LOADING (RECEIVING) LOCATED AT TRUCK LOADING LANE #3.

PERMIT UNIT REQUIREMENTS

1. Off-loading and vapor collection system shall be maintained and operated such that there are no liquid component leaks. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Vapor return line vents on tanker truck storage vessels shall be open only during the off-loading (receiving) operation and shall be closed immediately upon completion of any organic liquid off-loading (receiving). [District Rule 2201] Federally Enforceable Through Title V Permit
3. Tanker truck hatches shall be closed at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The off-loading (receiving) equipment shall not be used for the loading of tanker trucks. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall not off-load (receive) any organic liquids with True Vapor Pressure greater than 11 psia. [District Rule 2201] Federally Enforceable Through Title V Permit
6. There shall be no more than 10 tanker trucks off-loaded (received) in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Total liquid drainage and leaks from all hose disconnects during the off-loading (receiving) operation shall not exceed 20 ml per tanker truck off-loaded (received). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The permittee shall maintain a daily record of the quantity of tanker trucks off-loaded (received), the type of liquid off-loaded (received), and the quantity of liquid off-loaded (received) in gallons. [District Rule 1070] Federally Enforceable Through Title V Permit
9. All records shall be maintained and retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] 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-758-12-3

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 10,000 GALLON ABOVEGROUND GASOLINE ADDITIVE (PDP-4000) STORAGE TANK #10

PERMIT UNIT REQUIREMENTS

1. Daily throughput for this tank shall not exceed 10,000 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Annual throughput for this tank shall not exceed 60,000 gallons per year based on a 12-month rolling basis. [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] 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] 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] Federally Enforceable Through Title V Permit
6. 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] Federally Enforceable Through Title V Permit
7. 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] 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] Federally Enforceable Through Title V Permit
9. Permittee shall maintain cumulative records of annual throughput in gallons on a monthly basis. [District Rule 2080] Federally Enforceable Through Title V Permit
10. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-13-8

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE JOHN ZINK VAPOR RECOVERY SYSTEM, CARBON ADSORPTION UNIT, MODEL #AA1218715B AND VAPOR BLADDER TANK #16 IN THE VAPOR RECOVERY LINE BEFORE THE VAPOR RECOVERY SYSTEM.

PERMIT UNIT REQUIREMENTS

1. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo container, which attest to the vapor integrity of the container. [District Rule 4621] 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 shall not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624] Federally Enforceable Through Title V Permit
3. The transfer rack 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] Federally Enforceable Through Title V Permit
4. The John Zink vapor processing unit shall have two operational carbon adsorption columns. Each column shall be regenerated every 15 minutes when the device is in operation. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The vapors from the facility's fixed roof tanks and loading rack may bypass the bladder tank (Tank #16) only during periods of time when the bladder tank is down for maintenance, repairs, breakdowns, inspection of the bladder tank, or degassing of the bladder tank. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fugitive VOC emissions from this unit shall not exceed 9,362 lb-VOC/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Vapor return hose(s) shall connect displaced vapors from the truck to the vapor control system whenever tank truck, trailer, or car is loading organic liquid. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
8. Vapor return hose(s) and connections between the tanker truck, trailer, or car and the vapor control system shall be leak-free. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
9. The facility shall be equipped with bottom loading and a vapor collection and control system such that the VOC emissions shall not exceed 0.08 pounds per 1,000 gallons of organic liquid loaded. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
10. The John Zink vapor processing unit is authorized to handle gasoline vapors from a total of no more than 895,000 gallons of gasoline throughput per day, nor 123,733,750 gallons of gasoline throughput per year. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
11. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
12. Source testing to demonstrate compliance with permit conditions and all rules and regulations, when the bladder tank is on-line, shall be conducted on an annual basis. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Compliance with the VOC emissions limit shall be determined using 40 CFR 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] Federally Enforceable Through Title V Permit
15. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081] 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] Federally Enforceable Through Title V Permit
17. The owner or operator shall calibrate, certify, and maintain, and quality-assure a Continuous Monitoring System (CMS) which continuously measures and records the VOCs (and other parameters, if any, to determine compliance with lb-VOC/1,000 gallon of organic liquid) while gasoline vapors are displaced to the John Zink carbon adsorption system. [District Rule 1080 and 40 CFR 63.11092(b)] Federally Enforceable Through Title V Permit
18. The CMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
19. The CMS shall meet the requirements in 40 CFR 60 Appendix B Performance Specification 8 (PS 8) or 8A (PS 8), as appropriate, or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
20. The CMS must be audited at least once every six months by conducting cylinder gas audits (CGA) using the procedure in 40 CFR Part 60 Appendix F, 5.1.2. Audit reports shall be submitted along with semi-annual compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
21. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080] Federally Enforceable Through Title V Permit
22. The CMS data shall be reduced to hourly averages as specified in 40 CFR 60.13(h), or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
23. Upon written notice from the District, the owner or operator shall provide a summary of the data obtained from the CMS. This summary shall be in the form and the manner prescribed by the District. [District Rule 1080] Federally Enforceable Through Title V Permit
24. The permittee shall maintain the following records: the date, time and duration of any malfunction of the continuous monitoring equipment; dates of performance testing; dates of evaluations, calibrations, checks, and adjustments of the continuous monitoring equipment; date and time period which a continuous monitoring system or monitoring device was inoperative. [District Rule 1080] Federally Enforceable Through Title V Permit
25. The owner or operator shall submit a written report of CMS operations on semi-annual basis to the District. The report shall include the following: Date, time intervals, data and magnitude of excess emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CMS was inoperative, except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080] 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.

26. A leak is defined as the dripping of VOC-containing liquid at a rate of more than 3 drops per minute, or the detection of any gaseous or vapor emissions with a concentration of VOC greater than 10,000 ppmv as methane above a background when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 4624] Federally Enforceable Through Title V Permit
27. 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] Federally Enforceable Through Title V Permit
28. The operator shall 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 EPA Method 21. [District Rule 4624] Federally Enforceable Through Title V Permit
29. All leaking components shall be repaired or replaced within 72 hours of discovery. 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] Federally Enforceable Through Title V Permit
30. 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 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] Federally Enforceable Through Title V Permit
31. Each activated carbon adsorption column shall be equipped with an operational pressure differential gauge. The optimum pressure for each column shall be determined after source testing. [District Rule 4624] Federally Enforceable Through Title V Permit
32. The permittee shall maintain records of all maintenance, repair, breakdown, tank inspection and testing, and degassing of the bladder tank events when the vapors are not first sent to the bladder tank and are sent directly to the John Zink vapor processing unit. These records shall indicate the times, dates and reasons why the bladder tank was off-line. [District Rule 2201] Federally Enforceable Through Title V Permit
33. The permittee shall maintain records of the daily gasoline throughput, cumulative annual gasoline throughput, in gallons, and results of required leak inspections. These records shall be retained for a minimum of five years and shall be made available for District inspection upon request. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
34. U.S. EPA administers the requirements of 40 CFR Part 63 Subpart BBBBBB. The owner or operator shall submit all applicable notifications and records to the administrator by the required compliance dates. This condition may be removed administratively from this permit once the District gets delegation from EPA to administer the requirements of 40 CFR Part 63 Subpart BBBBBB. [District Rule 4002] 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-758-14-3

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 689,136 GALLON (16,408 BBL) ABOVEGROUND WELDED EXTERNAL FLOATING ROOF GASOLINE STORAGE TANK (TANK #18) WITH A MECHANICAL SHOE TYPE PRIMARY SEAL AND A SECONDARY WIPE SEAL

PERMIT UNIT REQUIREMENTS

1. A vapor recovery system shall be required if the true vapor pressure of the stored liquid equals or exceeds 11 psia. [District Rule 4623]
2. Daily throughput for this tank shall not exceed 689,136 gallons per day. [District Rule 2201]
3. Annual throughput for this tank shall not exceed 50,952,827 gallons per year based on a 12-month rolling basis. [District Rule 2201]
4. 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 as the secondary seal. [District Rule 4623 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
5. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
6. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
7. 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] Federally Enforceable Through Title V Permit
8. Accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm² per meter (10.01 in² per foot) of tank diameter, and the width of any gap shall not exceed 3.81 cm (1.5 inches). [40CFR 63.11087(c)] Federally Enforceable Through Title V Permit
9. 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] Federally Enforceable Through Title V Permit
10. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623] Federally Enforceable Through Title V Permit
11. Accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm² per meter (1.0 in² per foot) of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm (1/2 inch). [District Rule 4623 and 40CFR 63.11087(c)] Federally Enforceable Through Title V Permit
12. If the primary seal used is a metallic shoe, one end of the metallic shoe is to extend into the stored liquid and the other end is to extend a minimum vertical distance of 61 cm (24 inches) above the stored liquid surface. [District Rule 4623. 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.

13. 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] Federally Enforceable Through Title V Permit
14. 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 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
15. 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] Federally Enforceable Through Title V Permit
16. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623] Federally Enforceable Through Title V Permit
17. All openings in the roof used for sampling and gauging, except pressure-vacuum (P/V) relief valve, 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] Federally Enforceable Through Title V Permit
18. The tank shall be in a leak-free condition. The pressure-vacuum (PV) relief valve shall be set to within 10% of the maximum allowable working pressure of the tank, permanently labeled with the operating pressure settings, properly maintained in good operating order in accordance with the manufacturer's instructions, and shall remain in leak-free condition except when the operating pressure exceeds the valve's set pressure. [District Rule 4623] Federally Enforceable Through Title V Permit
19. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623] Federally Enforceable Through Title V Permit
20. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
21. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
22. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
23. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
24. 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 and 40 CFR 63.11087(a)] Federally Enforceable Through Title V Permit
25. 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] Federally Enforceable Through Title V Permit
26. All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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27. 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] Federally Enforceable Through Title V Permit
28. 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] Federally Enforceable Through Title V Permit
29. 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] Federally Enforceable Through Title V Permit
30. 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] Federally Enforceable Through Title V Permit
31. 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] Federally Enforceable Through Title V Permit
32. Operator shall perform gap measurements on primary and secondary seals within 60 days of the initial fill 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 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
33. Operator shall also perform gap measurements on primary seals during hydrostatic testing of the vessel. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
34. If unit is out of service for a period of one year or more, subsequent refilling with gasoline shall be considered initial fill in accordance with the conditions of this permit. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
35. Operator shall determine gap widths and gap areas for compliance with 40 CFR 60.113b(b)(2) and (3) in the primary and secondary seals using the following procedure: 1) Measure seal gaps, at one or more floating roof levels when the roof is floating off roof leg supports; 2) Measure seal gaps around entire circumference of the tank in each place where a 0.32 cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the tank wall and measure the circumferential distance of each such location; 3) Total surface area of each gap shall be determined by using probes of various widths to accurately measure the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance; and 4) Add the gap surface area of each gap location for the primary seal and the secondary seal individually. Divide the sum for each seal by the nominal diameter of the tank. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
36. If the seals do not meet the required specifications of 40 CFR 60.113b(b)(4)(i) and (ii), operator shall repair or empty the storage vessel within 45 days of identification. [40CFR 63.11087(c)] Federally Enforceable Through Title V Permit
37. Operator shall notify the APCO 30 days in advance of any gap measurements required by 40 CFR 63.11092(e)(2) and 40 CFR 60.113b(b) to afford the APCO opportunity to have an observer present. [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.

38. After the tank has been emptied and degassed, if the external floating roof has defects, or the primary seal or secondary seal has holes, tears, or other openings in the seal or seal fabric, the operator shall repair the items as necessary so that none of these conditions exist before filling or refilling the storage vessel with gasoline. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
39. For all visual inspections required by 40 CFR 63.11092(e)(2), the operator shall notify the APCO in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the APCO the opportunity to inspect the storage vessel prior to refilling, except when notification is specifically allowed otherwise by this permit. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
40. If a visual inspection required by 40 CFR 63.11092(e)(2) is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall notify the APCO at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so it is received by the APCO at least 7 days prior to the refilling. [40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
41. Operator shall record the vessel on which the measurement was performed, date of the seal gap measurement, raw data obtained in the measurement process in accordance with the conditions of this permit. [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
42. Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements: the date of measurement, raw data obtained in the measurement process, and all such gap calculations as required by 40 CFR 63.11092(e)(2). [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
43. Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements that exceeded 40 CFR 60.113b(4) limits: the date of measurement, raw data obtained in the measurement process, all such gap calculations as required by 40 CFR 63.1192(e)(2), and the date the vessel was emptied or the repairs made and the date of repair. [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit
44. The permittee shall inspect the primary and secondary seals for compliance with the requirements of Rule 4623 every time this tank is emptied or degassed. 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 and 40 CFR 63.11087(c)] Federally Enforceable Through Title V Permit
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 Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
46. 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] Federally Enforceable Through Title V Permit
47. Permittee shall maintain cumulative records of annual gasoline throughput in gallons on a monthly basis. [District Rule 2080] Federally Enforceable Through Title V Permit
48. The permittee shall maintain all records required by this permit for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 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-758-15-1

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 300 GALLON ABOVEGROUND DIESEL ADDITIVE STORAGE TANK

PERMIT UNIT REQUIREMENTS

1. Only diesel additives shall be stored in this tank. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The maximum throughput shall not exceed 300 gallons in any one day and 2,000 gallons in any one calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Emissions from the tank shall not exceed 0.5 lb-VOC/day and shall not exceed 9 lb-VOC/year. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The operator shall keep a record of the daily quantity of diesel additive loaded into the tank and the cumulative annual quantity of diesel additive loaded into the tank, in gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All records shall be maintained for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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

Attachment C

PREVIOUS DISTRICT PERMITS



Permit to Operate

FACILITY: N-758

EXPIRATION DATE: 01/31/2017

LEGAL OWNER OR OPERATOR:

EQUILON ENTERPRISES LLC

MAILING ADDRESS:

20945 S WILMINGTON AVE
CARSON, CA 90810

FACILITY LOCATION:

ROUGH & READY ISLAND
STOCKTON, CA 95203

FACILITY DESCRIPTION:

BULK 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.

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Executive Director / APCO

David Warner

Director of Permit Services

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-1-0

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

1,357 BBL ABOVEGROUND GASOLINE STORAGE TANK #12 SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. 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]
4. All piping, valves, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 4623]
5. 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]
6. 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]
7. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline shall be submitted to the District. [District Rule 2080]
8. 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 2080]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-2-0

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

580 BBL ABOVEGROUND GASOLINE STORAGE TANK #13 SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. 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]
4. All piping, valves, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 4623]
5. 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]
6. 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]
7. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline shall be submitted to the District. [District Rule 2080]
8. 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 2080]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-3-0

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

15,000 BBL ABOVEGROUND GASOLINE STORAGE TANK #14 SERVED BY THE JOHN ZINK VAPOR RECOVERY SYSTEM (N-758-13)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. 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]
4. All piping, valves, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 4623]
5. 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]
6. 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]
7. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline shall be submitted to the District. [District Rule 2080]
8. 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 2080]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-4-3

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

12,000 BBL ABOVEGROUND INTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL STORAGE TANK #19 WITH A PRIMARY MECHANICAL SHOE TYPE SEAL AND SECONDARY RIM-MOUNTED WIPER SEAL

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. VOC emissions from this tank shall not exceed 14.1 pounds in any one day. [District Rule 2201]
3. Fugitive VOC from valves, flanges, connector, pump seals etc associated with this tank shall not exceed 0.2 pounds in any one day. [District Rule 2201]
4. The daily throughput of the organic liquid shall not exceed 504,000 gallons. [District Rule 2201]
5. The monthly throughput of the organic liquid shall not exceed 1,250,000 gallons. [District Rule 2201]
6. True vapor pressure (TVP) of the liquid stored in this tank shall not exceed 8.7 psia. [District Rule 2201]
7. The permittee shall determine TVP and the temperature of the organic liquid stored on monthly basis. [District Rule 2201]
8. Fugitive VOC emissions from component leaks shall be calculated using component count and appropriate emission factors from "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-1b (Feb 1999) - Marketing Terminal. [District Rule 2201]
9. The floating roof shall be floating 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 processes of filling or emptying and refilling the tank 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 the roof on its legs. [District Rule 4623 Section 5.4.3, 40 CFR 60.112b(a)(1)(i)]
10. No gap between the tank shell and the primary seal shall exceed one and one-half (1-1/2) inches. [District Rule 4653 Sections 5.3.2.1.1 and 5.4.1]
11. The cumulative length of all gaps between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623 Sections 5.3.2.1.1 and 5.4.1]
12. The primary seal shall have no continuous gap greater than one-eighth (1/8) inch that exceeds 10 percent of the tank circumference. [District Rule 4623 Sections 5.3.2.1.1 and 5.4.1]
13. No gap between the tank shell and the secondary seal shall exceed one-half (1/2) inch. [District Rule 4623 Sections 5.3.2.1.2 and 5.4.1]
14. The cumulative length of all gaps between the tank shell and the secondary seal, greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference. [District Rule 4623 Sections 5.3.2.1.2 and 5.4.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. 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 Section 5.4.1]
16. 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 Sections 5.3.2.1.4 and 5.4.1]
17. 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 Sections 5.3.2.1.5 and 5.4.1]
18. The secondary seal shall allow easy insertion of probes of up to one and one-half (1-1/2) inches in width in order to measure gaps in the primary seal. [District Rule 4623 Sections 5.3.2.1.6 and 5.4.1]
19. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623 Sections 5.3.2.1.7 and 5.4.1]
20. All openings in the roof used for sampling and gauging 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. The cover seal or lid shall be in a closed position, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623 Section 5.5.1]
21. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623 Sections 3.11, 5.1.3, and 6.4.8]
22. 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 Section 5.5.2.1.1, 40 CFR 60.112b(a)(1)(iii)]
23. 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. [District Rule 4623 Section 5.5.2.1.2, 40 CFR 60.112b(a)(1)(iv)]
24. 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. [District Rule 4623 Section 5.5.2.1.3, 40 CFR 60.112b(a)(1)(v)]
25. 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. [District Rule 4623 Section 5.5.2.1.4, 40 CFR 60.112b(a)(1)(vi)]
26. 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. The fabric cover must be impermeable. [District Rule 4623 Section 5.5.2.1.5, 40 CFR 60.112b(a)(1)(vii)]
27. 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. The fabric sleeve must be impermeable. [District Rule 4623 Section 5.5.2.1.6, 40 CFR 60.112b(a)(1)(viii)]
28. 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)]
29. All solid sampling or gauging wells, and similar fixed projections through the floating roof such as anti-rotational pipe shall provide a projection below the liquid surface. [District Rule 4623 Section 5.5.2.3.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

30. 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 not exceed one-half (1/2) inch. [District Rule 4623 Section 5.5.2.3.3]
31. 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, Section 6.1.4.1, 40 CFR 60.113b(a)(1)]
32. The permittee shall visually inspect, through the manholes, roof hatches, or other opening 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 Section 6.1.4.2, 40 CFR 60.113b(a)(2)]
33. 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 Section 6.1.4.3]
34. 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)]
35. 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)]
36. The 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, 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 Section 6.3.5, 60.115b(a)(2), 60.115b(a)(3)]
37. 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. [District Rule 2201, 40 CFR 60.116b(c)]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

38. The permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Section 5.3.1.3 and 5.4.3. The records shall include information on the TVP, API gravity, and 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 Section 6.3.7]
39. The permittee shall maintain records of daily and monthly organic liquid throughput in gallons. [District Rule 2201]
40. The permittee shall keep all records on-site for a period of at least five years. These records shall be made available for District inspection upon request. [District Rules 2201 and 4623]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-5-4

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

9,886 BBL WELDED INTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL STORAGE TANK (TANK #20)
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. VOC emissions from this tank shall not exceed 13.8 pounds in any one day. [District Rule 2201]
3. Fugitive VOC from valves, flanges, connector, pump seals etc associated with this tank shall not exceed 0.1 pounds in any one day. [District Rule 2201]
4. The daily throughput of the organic liquid shall not exceed 415,212 gallons. [District Rule 2201]
5. The monthly throughput of the organic liquid shall not exceed 1,483,848 gallons. [District Rule 2201]
6. True vapor pressure (TVP) of the liquid stored in this tank shall not exceed 8.7 psia. [District Rule 2201]
7. The permittee shall determine TVP and the temperature of the organic liquid stored on monthly basis. [District Rule 2201]
8. Fugitive VOC emissions from component leaks shall be calculated using component count and appropriate emission factors from "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities", Table IV-1b (Feb 1999) - Marketing Terminal. [District Rule 2201]
9. The floating roof shall be floating 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 processes of filling or emptying and refilling the tank 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 the roof on its legs. [District Rule 4623 Section 5.4.3, 40 CFR 60.112b(a)(1)(i)]
10. No gap between the tank shell and the primary seal shall exceed one and one-half (1-1/2) inches. [District Rule 4653 Sections 5.3.2.1.1 and 5.4.1]
11. The cumulative length of all gaps between the tank shell and the primary seal: 1) Greater than one-half (1/2) inch shall not exceed 10 percent of the circumference of the tank; and 2) Greater than one-eighth (1/8) inch shall not exceed 30 percent of the circumference of the tank. [District Rule 4623 Sections 5.3.2.1.1 and 5.4.1]
12. The primary seal shall have no continuous gap greater than one-eighth (1/8) inch that exceeds 10 percent of the tank circumference. [District Rule 4623 Sections 5.3.2.1.1 and 5.4.1]
13. No gap between the tank shell and the secondary seal shall exceed one-half (1/2) inch. [District Rule 4623 Sections 5.3.2.1.2 and 5.4.1]
14. The cumulative length of all gaps between the tank shell and the secondary seal, greater than one-eighth (1/8) inch shall not exceed 5 percent of the tank circumference. [District Rule 4623 Sections 5.3.2.1.2 and 5.4.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. 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 Section 5.4.1]
16. 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 Sections 5.3.2.1.4 and 5.4.1]
17. 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 Sections 5.3.2.1.5 and 5.4.1]
18. The secondary seal shall allow easy insertion of probes of up to one and one-half (1-1/2) inches in width in order to measure gaps in the primary seal. [District Rule 4623 Sections 5.3.2.1.6 and 5.4.1]
19. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623 Sections 5.3.2.1.7 and 5.4.1]
20. All openings in the roof used for sampling and gauging 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. The cover seal or lid shall be in a closed position, with no visible gaps and be gas tight, except when the device or appurtenance is in use. [District Rule 4623 Section 5.5.1]
21. A leak-free condition is defined as a condition without a gas or liquid leak. A gas leak is defined as a reading in excess of 10,000 ppmv as methane, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A liquid leak is defined as a dripping rate of more than three (3) drops per minute. A reading in excess of 10,000 ppmv as methane above background or a liquid leak of greater than three (3) drops per minute is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623 Sections 3.1.1, 5.1.3, and 6.4.8]
22. 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 Section 5.5.2.1.1, 40 CFR 60.112b(a)(1)(iii)]
23. 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. [District Rule 4623 Section 5.5.2.1.2, 40 CFR 60.112b(a)(1)(iv)]
24. 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. [District Rule 4623 Section 5.5.2.1.3, 40 CFR 60.112b(a)(1)(v)]
25. 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. [District Rule 4623 Section 5.5.2.1.4, 40 CFR 60.112b(a)(1)(vi)]
26. 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. The fabric cover must be impermeable. [District Rule 4623 Section 5.5.2.1.5, 40 CFR 60.112b(a)(1)(vii)]
27. 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. The fabric sleeve must be impermeable. [District Rule 4623 Section 5.5.2.1.6, 40 CFR 60.112b(a)(1)(viii)]
28. 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)]
29. All slotted sampling or gauging wells, and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623 Section 5.5.2.4.1]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

30. 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 not exceed one-eighth (1/8) inch. [District Rule 4623 Section 5.5.2.4.3]
31. 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, Section 6.1.4.1, 40 CFR 60.113b(a)(1)]
32. The permittee shall visually inspect, through the manholes, roof hatches, or other opening 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 Section 6.1.4.2, 40 CFR 60.113b(a)(2)]
33. 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 Section 6.1.4.3]
34. 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)]
35. 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)]
36. The 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 Section 6.3.5, 60.115b(a)(2), 60.115b(a)(3)]
37. 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. [District Rule 2201, 40 CFR 60.116b(c)]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

38. The permittee shall maintain the records of the internal floating roof landing activities that are performed pursuant to Rule 4623, Section 5.3.1.3 and 5.4.3. The records shall include information on the TVP, API gravity, and 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 Section 6.3.7]
39. The permittee shall maintain records of daily and monthly organic liquid throughput in gallons. [District Rule 2201]
40. The permittee shall keep all records on-site for a period of at least five years. These records shall be made available for District inspection upon request. [District Rules 2201 and 4623]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-6-1

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

21,400 ABOVEGROUND EXTERNAL FLOATING ROOF GASOLINE STORAGE TANK #21

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. A vapor recovery system shall be required if the true vapor pressure of the stored liquid equals or exceeds 11 psia. [District Rule 4623]
4. Daily throughput for this tank shall not exceed 898,800 gallons per day. [District Rule 2201]
5. Annual throughput for this tank shall not exceed 67,389,222 gallons per year. [District Rule 2201]
6. 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 as the secondary seal. [District Rule 4623]
7. 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]
8. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623]
9. 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]
10. 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]
11. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623]
12. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623]
13. 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]
14. 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]
15. 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: EQUILON ENTERPRISES LLC

Location: ROUGH & READY ISLAND, STOCKTON, CA 95203

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16. 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]
17. 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]
18. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623]
19. 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]
20. 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]
21. 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]
22. 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]
23. 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]
24. 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]
25. 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]
26. 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]
27. All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623]
28. 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]
29. 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]
30. 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]
31. 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

32. 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]
33. 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]
34. 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]
35. 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]
36. 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]
37. Permittee shall maintain cumulative records of annual gasoline throughput in gallons on a monthly basis. [District Rule 2080]
38. 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-758-7-0

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

9,500 BBL ABOVEGROUND GASOLINE STORAGE TANK #17 SERVED BY THE JOHN ZINC VAPOR RECOVERY SYSTEM (N-758-13)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. 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]
4. All piping, valves, and fittings shall be constructed and maintained in a gas-tight condition. [District Rule 4623]
5. 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]
6. 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]
7. Within the first 5 days of each month, a written report of the previous month's throughput of gasoline shall be submitted to the District. [District Rule 2080]
8. 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 2080]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-9-0

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:
BULK LOADING RACK

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Within the first 5 days of each month, a written report of the pervious month's throughput of gasoline shall be submitted to the District. [District Rule 2080]
4. 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 2080]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-10-1

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

BULK LOADING RACK #2 WITH 4 GASOLINE LOADING ARMS, 2 DIESEL LOADING ARMS, AND 1 ETHANOL LOADING ARM

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. All vapors displaced during truck loading shall be vented to the vapor recovery system (N-758-13). [District Rule 2201 and 40 CFR 60 Subpart XX]
4. Gasoline shall be loaded only into vapor tight tank trucks. [40 CFR Part 60.502(e) and 40 CFR Part 63.11088(a)]
5. The facility shall obtain the vapor tightness documentation specified in 40 CFR Part 60.505(b) for each gasoline tank truck that is to be loaded at the facility. [40 CFR Part 60.502(e)(1)]
6. 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 Part 60.505(a) and (b), and 40 CFR 63.11094(b)]
7. The transfer rack and vapor collection equipment shall be maintained and operated such that there are no leaks and such that there is no excess organic liquid drainage during disconnections. [District Rule 4624]
8. The operator must inspect the vapor collection system, the vapor disposal system, and each transfer rack handling organic liquids for leaks, using EPA Method 21, at least once every calendar quarter. [District Rule 4624]
9. Each calendar month, the vapor collection system, the vapor processing system and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for organic liquid and organic vapor leaks. For the purpose of this condition, detection methods incorporating sight, sound and smell are acceptable. [40 CFR Part 60.502(j) and 40 CFR Part 63.11089(a)]
10. All leaking components shall be repaired or replaced within 72 hours of discovery. 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 replaced equipment shall be re-inspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624]
11. A log book shall be used and shall be signed by the owner or operator at the completion of each leak 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 Part 63.11089(b)]
12. 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 3 calendar days after discovery of the leak; 6.) the date of successful repair of the leak; and 8.) inspector name and signature. [District Rule 4624, 40 CFR Part 60.505 (c) and 40 CFR 63.11089(g)]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: EQUILON ENTERPRISES LLC

Location: ROUGH & READY ISLAND, STOCKTON, CA 95203

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13. The permittee shall keep records of the daily gasoline throughput, the cumulative annual gasoline throughput, in gallons. [District Rules 2201 and 4624]
14. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, 2201, 4624, and 40 CFR 60.505, and 40 CFR 63.11094(a)]
15. The owner/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)]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-11-1

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

BULK OFF-LOADING OPERATION UTILIZED FOR GASOLINE OR ETHANOL OFF-LOADING (RECEIVING) LOCATED AT TRUCK LOADING LANE #3

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Off-loading and vapor collection system shall be maintained and operated such that there are no liquid component leaks. [District Rule 2201]
3. Vapor return line vents on tanker truck storage vessels shall be open only during the off-loading (receiving) operation and shall be closed immediately upon completion of any organic liquid off-loading (receiving). [District Rule 2201]
4. Tanker truck hatches shall be closed at all times. [District Rule 2201]
5. The off-loading (receiving) equipment shall not be used for the loading of tanker trucks. [District Rule 2201]
6. The permittee shall not off-load (receive) any organic liquids with True Vapor Pressure greater than 11 psia. [District Rule 2201]
7. There shall be no more than 10 tanker trucks off-loaded (received) in any one day. [District Rule 2201]
8. Total liquid drainage and leaks from all hose disconnects during the off-loading (receiving) operation shall not exceed 20 ml per tanker truck off-loaded (received). [District Rule 2201]
9. The permittee shall maintain a daily record of the quantity of tanker trucks off-loaded (received), the type of liquid off-loaded (received), and the quantity of liquid off-loaded (received) in gallons. [District Rule 1070]
10. All records shall be maintained and retained on-site 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-12-2

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 10,000 GALLON ABOVEGROUND GASOLINE ADDITIVE (PDP-4000) STORAGE TANK

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Daily throughput for this tank shall not exceed 10,000 gallons per day. [District Rule 2201]
4. Annual throughput for this tank shall not exceed 60,000 gallons per year. [District Rule 2201]
5. 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]
6. 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]
7. 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]
8. 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]
9. 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]
10. 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]
11. 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]
12. Permittee shall maintain cumulative records of annual throughput in gallons on a monthly basis. [District Rule 2080]
13. 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-758-13-7

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE JOHN ZINK VAPOR RECOVERY SYSTEM, CARBON ADSORPTION UNIT, MODEL AA1218715B AND VAPOR BLADDER TANK #16 IN THE VAPOR RECOVERY LINE BEFORE THE VAPOR RECOVERY SYSTEM

PERMIT UNIT REQUIREMENTS

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]
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 (e.g. breakdown of vapor recovery system), the date and cause of the initial failure, the estimated emissions in excess of those allowed including the amount of gasoline loaded during the breakdown period, and the methods utilized to restore normal operations. [District Rule 1100]
3. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo container, which attest to the vapor integrity of the container. [District Rule 4621]
4. The vapor collection and control system shall operate such that the pressure in the delivery tank being loaded shall not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.4]
5. The transfer rack 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, 5.6]
6. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
7. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
8. The John Zink vapor processing unit shall have two operational carbon adsorption columns. Each column shall be regenerated every 15 minutes when the device is in operation. [District Rule 2201]
9. The vapors from the facility's fixed roof tanks and loading rack may bypass the bladder tank (Tank #16) only during periods of time when the bladder tank is down for maintenance, repairs, breakdowns, inspection of the bladder tank, or degassing of the bladder tank. [District Rule 2201]
10. Fugitive VOC emissions from this unit shall not exceed 9,362 lb-VOC/yr. [District Rule 2201]
11. Vapor return hose(s) shall connect displaced vapors from the truck to the vapor control system whenever tank truck, trailer, or car is loading organic liquid. [District Rules 2201 and 4624, 5.1]
12. Vapor return hose(s) and connections between the tanker truck, trailer, or car and the vapor control system shall be leak-free. [District Rules 2201 and 4624, 5.1]
13. The facility shall be equipped with bottom loading and a vapor collection and control system such that the VOC emissions shall not exceed 0.08 pounds per 1,000 gallons of organic liquid loaded. [District Rule 2201 and 4624]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. The John Zink vapor processing unit is authorized to handle gasoline vapors from a total of no more than 895,000 gallons of gasoline throughput per day, nor 123,733,750 gallons of gasoline throughput per year. [District Rules 2201 and 4624]
15. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]
16. Source testing to demonstrate compliance with permit conditions and all rules and regulations, when the bladder tank is on-line, shall be conducted on an annual basis. [District Rule 2201]
17. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081]
18. Compliance with the VOC emissions limit shall be determined using 40 CFR 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]
19. Source testing shall be witnessed or authorized by District personnel and samples shall be collected by a California Air Resources Board (CARB) certified testing laboratory or a CARB certified source testing firm. [District Rule 1081]
20. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
21. The owner or operator shall calibrate, certify, and maintain, and quality-assure a Continuous Monitoring System (CMS) which continuously measures and records the VOCs (and other parameters, if any, to determine compliance with lb-VOC/1,000 gallon of organic liquid) while gasoline vapors are displaced to the John Zink carbon adsorption system. [District Rule 1080 and 40 CFR 63.11092(b)]
22. The CMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour or shall meet equivalent specifications established by mutual agreement of the District, the CARB and the EPA. [District Rule 1080]
23. The CMS shall meet the requirements in 40 CFR 60 Appendix B Performance Specification 8 (PS 8) or 8A (PS 8), as appropriate, or shall meet equivalent specifications established by mutual agreement of the District, the CARB, and the EPA. [District Rule 1080]
24. The CMS must be audited at least once every six months by conducting cylinder gas audits (CGA) using the procedure in 40 CFR Part 60 Appendix F, 5.1.2. Audit reports shall be submitted along with semi-annual compliance reports to the District. [District Rule 1080]
25. APCO or an authorized representative shall be allowed to inspect, as determined to be necessary, the required monitoring devices to ensure that such devices are functioning properly. [District Rule 1080]
26. The CMS data shall be reduced to hourly averages as specified in 40 CFR 60.13(h), or by other methods deemed equivalent by mutual agreement with the District, the CARB, and the EPA. [District Rule 1080]
27. Upon written notice from the District, the owner or operator shall provide a summary of the data obtained from the CMS. This summary shall be in the form and the manner prescribed by the District. [District Rule 1080]
28. The permittee shall maintain the following records: the date, time and duration of any malfunction of the continuous monitoring equipment; dates of performance testing; dates of evaluations, calibrations, checks, and adjustments of the continuous monitoring equipment; date and time period which a continuous monitoring system or monitoring device was inoperative. [District Rule 1080]
29. The owner or operator shall submit a written report of CMS operations on semi-annual basis to the District. The report shall include the following: Date, time intervals, data and magnitude of excess emissions, nature and the cause of excess (if known), corrective actions taken and preventive measures adopted; Averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard; Applicable time and date of each period during which the CMS was inoperative, except for zero and span checks, and the nature of system repairs and adjustments; A negative declaration when no excess emissions occurred. [District Rule 1080]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

30. A leak is defined as the dripping of VOC-containing liquid at a rate of more than 3 drops per minute, or the detection of any gaseous or vapor emissions with a concentration of VOC greater than 10,000 ppmv as methane above a background when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 4624, 3.17]
31. 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]
32. The operator shall 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 EPA Method 21. [District Rule 4624, 5.9]
33. All leaking components shall be repaired or replaced within 72 hours of discovery. 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]
34. An 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]
35. Each activated carbon adsorption column shall be equipped with an operational pressure differential gauge. The optimum pressure for each column shall be determined after source testing. [District Rule 4624]
36. The permittee shall maintain records of all maintenance, repair, breakdown, tank inspection and testing, and degassing of the bladder tank events when the vapors are not first sent to the bladder tank and are sent directly to the John Zink vapor processing unit. These records shall indicate the times, dates and reasons why the bladder tank was off-line. [District Rule 2201]
37. The permittee shall maintain records of the daily gasoline throughput, cumulative annual gasoline throughput, in gallons, and results of required leak inspections. These records shall be retained for a minimum of five years and shall be made available for District inspection upon request. [District Rules 2201 and 4624]
38. U.S. EPA administers the requirements of 40 CFR Part 63 Subpart BBBB. The owner or operator shall submit all applicable notifications and records to the administrator by the required compliance dates. This condition may be removed administratively from this permit once the District gets delegation from EPA to administer the requirements of 40 CFR Part 63 Subpart BBBB. [District Rule 4002]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-758-14-2

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

16,408 BBL ABOVEGROUND WELDED EXTERNAL FLOATING ROOF GASOLINE STORAGE TANK (TANK #18) WITH A MECHANICAL SHOE TYPE PRIMARY SEAL AND A SECONDARY WIPE SEAL

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. A vapor recovery system shall be required if the true vapor pressure of the stored liquid equals or exceeds 11 psia. [District Rule 4623]
4. Daily throughput for this tank shall not exceed 689,136 gallons per day. [District Rule 2201]
5. Annual throughput for this tank shall not exceed 50,952,827 gallons per year. [District Rule 2201]
6. 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]
7. 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]
8. Gaps between the tank shell and the primary seal shall not exceed 1 1/2 inches. [District Rule 4623]
9. 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]
10. 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]
11. No continuous gap in the primary seal greater than 1/8 inch wide shall exceed 10% of the tank circumference. [District Rule 4623]
12. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623]
13. 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]
14. 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]
15. 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

16. 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]
17. 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]
18. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal. [District Rule 4623]
19. 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]
20. 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]
21. 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]
22. 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]
23. 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]
24. 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]
25. 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]
26. 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]
27. All wells and similar fixed projections through the floating roof shall provide a projection below the liquid surface. [District Rule 4623]
28. 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]
29. 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]
30. 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]
31. 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]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

32. 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]
33. 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]
34. 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]
35. 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]
36. 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]
37. Permittee shall maintain cumulative records of annual gasoline throughput in gallons on a monthly basis. [District Rule 2080]
38. 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-758-15-0

EXPIRATION DATE: 01/31/2017

EQUIPMENT DESCRIPTION:

ONE 300 GALLON ABOVEGROUND DIESEL ADDITIVE STORAGE TANK

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Only diesel additives shall be stored in this tank. [District Rule 2201]
4. The maximum throughput shall not exceed 300 gallons in any one day and 2,000 gallons in any one calendar year. [District Rule 2201]
5. Emissions from the tank shall not exceed 0.5 lb-VOC/day and shall not exceed 9 lb-VOC/year. [District Rule 2201]
6. The operator shall keep a record of the daily quantity of diesel additive loaded into the tank and the cumulative annual quantity of diesel additive loaded into the tank, in gallons. [District Rule 2201]
7. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 2201]

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

Attachment D

TEMPLATE QUALIFICATION FORM

Template SJV-UM-0-3

Title V General Permit Template Qualification Form for Facility-wide Umbrella General Permit Template

District facility ID # N-758


To use this template, remove this sheet and attach to application. The conditions outlined in this template will be placed on your Title V permit.

Any facility may use this facility-wide template as part of its Title V application.

Based on information and belief formed after reasonable inquiry: 1) the information on this form is true and correct and 2) the facility certifies compliance with this template's permit conditions.



Signature of Responsible Official



Date

Don Herman

Name of Responsible Official (Please Print)

Note: The Stockton terminal operates two pieces of equipment (a load rack and additive storage tank) that require a permit or permit modification. Permit applications have been submitted and it is expected that permits to operate will be issued in a timely manner. Per Rule 2010 Section 4.3, the applications serve as temporary Permits to Operate.

Attachment E

FACILITY'S COMMENTS AND DISTRICT'S RESPONSES

Equilon Enterprises LLC dba Shell Oil Products US
Stockton Terminal (Facility ID: N-758)
District's Response to Comments, Draft Title V Permit

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-1-1	5. {2623} Maximum true vapor pressure, for crude oil or refined petroleum products, may be determined from nomographs contained in API Bulletin 2517, by using the typical Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product, unless the APCO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.116b(e)(2)(i)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1940 (see Appendix, Attachment 1), and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. Therefore, this condition has been removed from the draft permit.
N-758-1-1	6. {2624} Operator shall determine the true vapor pressure of each type of crude oil with a Reid vapor pressure less than 2.0 psia or whose physical properties preclude determination by the recommended method from available data and record if the true vapor pressure is greater than 0.5 psia. [40 CFR 60.116b(e)(2)(ii)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1940, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. Additionally, this tank cannot store crude oil and this condition is unnecessary and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. Therefore, this condition has been removed from the draft permit.
N-758-1-1	9. The owner or operator shall keep the following records for the closed vent system and control device: 1) A copy of the operating plan; and 2) A record of the measured values of the parameters monitored in accordance with 40 CFR	A records review indicates that this storage tank was constructed in 1940, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. However, the tank is also subject to 40 CFR 63.11094(a) which requires this tank to meet the same record keeping requirements as stated under 40

Permit Unit	Draft Condition	Comment to District	District's Response
	60.113b(c)(2). [40 CFR 60.115b(c)] Federally Enforceable Through Title V Permit		CFR 60.115b(c). Therefore, this condition cannot be removed, instead condition reference will be changed to 40 CFR 463.11094(a).
N-758-1-1	10. {2630} Operator shall maintain a record showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The record shall be maintained for the life of the vessel. [40 CFR 60.116b(b)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1940, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. Therefore, this condition has been removed from the draft permit.
N-758-1-1	11. The permittee shall maintain all records required by this permit on-site for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 and 40 CFR 60.116b(a)] Federally Enforceable Through Title V Permit	Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below: "Retention of 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." Also, a records review indicates that this storage tank was constructed in 1940, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that reference to 40 CFR 60.116b(a) be changed to 40 CFR 63.11094(a).	The word "onsite" was removed from the condition as requested. District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. However, the tank is also subject to 40 CFR 63.11094(a) which requires this tank to meet the same record keeping requirements as stated under 40 CFR 60.115b(c). Therefore, condition reference changed to 40 CFR 63.11094(a).

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-2-1	5. {2623} Maximum true vapor pressure, for crude oil or refined petroleum products, may be determined from nomographs contained in API Bulletin 2517, by using the typical Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product, unless the APCO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.116b(e)(2)(i)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1936 (see Appendix, Attachment 1), and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1936. Therefore, this condition has been removed from the draft permit.
N-758-2-1	6. {2624} Operator shall determine the true vapor pressure of each type of crude oil with a Reid vapor pressure less than 2.0 psia or whose physical properties preclude determination by the recommended method from available data and record if the true vapor pressure is greater than 0.5 psia. [40 CFR 60.116b(e)(2)(ii)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1936, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. Additionally, this tank cannot store crude oil and this condition is unnecessary and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1936. Therefore, this condition has been removed from the draft permit.
N-758-2-1	9. {2630} Operator shall maintain a record showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The record shall be maintained for the life of the vessel. [40 CFR 60.116b(b)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1936, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1936. Therefore, this condition has been removed from the draft permit.

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-2-1	<p>10. The permittee shall maintain all records required by this permit on-site for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 and 40 CFR 60.116b(a)] Federally Enforceable Through Title V Permit</p>	<p>Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below:</p> <p>"Retention of 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."</p> <p>Also, a records review indicates that this storage tank was constructed in 1936, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that reference to 40 CFR 60.116b(a) be changed to 40 CFR 63.11094(a).</p>	<p>The word "onsite" was removed from the condition as requested.</p> <p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1936. However, the tank is also subject to 40 CFR 63.11094(a) which requires this tank to meet the same record keeping requirements as stated under 40 CFR 60.115b(c). Therefore, condition reference changed to 40 CFR 63.11094(a).</p>
N-758-3-1	<p>5. {2623} Maximum true vapor pressure, for crude oil or refined petroleum products, may be determined from nomographs contained in API Bulletin 2517, by using the typical Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product, unless the APCO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.116b(e)(2)(i)] Federally Enforceable Through Title V Permit</p>	<p>A records review indicates that this storage tank was constructed in 1940 (see Appendix, Attachment 3), and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.</p>	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. Therefore, this condition has been removed from the draft permit.</p>

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-3-1	6. {2624} Operator shall determine the true vapor pressure of each type of crude oil with a Reid vapor pressure less than 2.0 psia or whose physical properties preclude determination by the recommended method from available data and record if the true vapor pressure is greater than 0.5 psia. [40 CFR 60.116b(e)(2)(ii)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1940, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. Additionally, this tank cannot store crude oil and this condition is unnecessary and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. Therefore, this condition has been removed from the draft permit.
N-758-3-1	9. {2630} Operator shall maintain a record showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The record shall be maintained for the life of the vessel. [40 CFR 60.116b(b)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1940, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. Therefore, this condition has been removed from the draft permit.
N-758-3-1	10. The permittee shall maintain all records required by this permit on-site for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 and 40 CFR 60.116b(a)] Federally Enforceable Through Title V Permit	<p>Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below:</p> <p>"Retention of 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."</p> <p>Also, a records review indicates that this storage tank was constructed in 1940, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that reference to 40 CFR 60.116b(a) be changed to 40 CFR 63.11094(a).</p>	<p>The word "onsite" was removed from the condition as requested.</p> <p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. However, the tank is also subject to 40 CFR 63.11094(a) which requires this tank to meet the same record keeping requirements as stated under 40 CFR 60.115b(c). Therefore, condition reference changed to 40 CFR 63.11094(a).</p>

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-4-4	44. The permittee shall maintain all records required by this permit on-site for a period of at least five years and shall made them readily available for District inspection upon request. [District Rules 2201 and 4623, and 40 CFR 60.116b(a)] Federally Enforceable Through Title V Permit	Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below: "Retention of 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."	The word "onsite" was removed from the condition as requested.
N-758-5-5	35. 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)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1949 (see Appendix, Attachment 4), and earlier versions of the permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 SubpartBBBBB requires operators to follow certain procedures in Subpart Kb, but SubpartBBBBB only applies to tanks storing gasoline. Shell suggests adding the phrase "when storing gasoline" to the condition, and adding "40 CFR 63.11092(e)(1)" to the rule reference.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1949. However, this tank is subject to 40 CFR SubpartBBBBB which requires standards under 40 CFR 60 Subpart Kb. The phrase "when storing gasoline" was added to the permit conditions and "40 CFR 63.11092(e)(1)" was added to the rule reference.
N-758-5-5	37. The 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	A records review indicates that this storage tank was constructed in 1949, and earlier versions of the permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1949. However, this tank is subject to 40 CFR SubpartBBBBB which requires standards under 40 CFR 60 Subpart

Permit Unit	Draft Condition	Comment to District	District's Response
	<p>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, 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, and 60.115b(a)(2) and 60.115b(a)(3)] Federally</p>	<p>40 CFR 63 Subpart BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. Shell suggests adding "40 CFR 63.11094(a)" to the rule reference.</p>	<p>Kb. Therefore, "40 CFR 63.11094(a)" was added to the rule reference.</p>

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	Enforceable Through Title V Permit		
N-758-5-5	38. The permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. [40 CFR 60.116b(b)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1949, and earlier versions of the permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1949. Therefore, this condition has been removed from the draft permit.
N-758-5-5	39. 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. [District Rule 2201 and 40 CFR 60.116b(c)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1949. Shell believes this tank is not subject to 40 CFR 60 Subpart Kb and requests that reference to 40 CFR 60.116b(c) be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1949. Therefore, reference to 40 CFR 60.116b(c) was removed from this condition.
N-758-5-5	40. {2623} Maximum true vapor pressure, for crude oil or refined petroleum products, may be determined from nomographs contained in API Bulletin 2517, by using the typical Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product, unless the APCO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.116b(e)(2)(i)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1949, and earlier versions of the permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1949. Therefore, this condition has been removed from the draft permit.

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N-758-5-5	44. The permittee shall maintain all records required by this permit on-site for a period of at least five years and shall made them readily available for District inspection upon request. [District Rules 2201 and 4623, and 40 CFR 60.116b(a)] Federally Enforceable Through Title V Permit	<p>Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below:</p> <p>"Retention of 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."</p> <p>Also, a records review indicates that this storage tank was constructed in 1949, and earlier versions of the permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that reference to 40 CFR 60.116b(a) be changed to 40 CFR 63.11094(a).</p>	<p>The word "onsite" was removed from the condition as requested.</p> <p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 19349. However, the tank is also subject to 40 CFR 63.11094(a) which requires this tank to meet the same record keeping requirements as stated under 40 CFR 60.115b(c). Therefore, condition reference changed to 40 CFR 63.11094(a).</p>
N-758-6-2	Equipment Description: ONE 898,800 GALLON (21,400 BBL) ABOVEGROUND EXTERNAL FLOATING ROOF GASOLINE STORAGE TANK #21	<p>Shell requests that the equipment description be changed to allow for storage of denatured ethanol, as is the case for N-758-4 and N-758-5. Equipment description should read:</p> <p>ONE 898,800 GALLON (21,400 BBL) ABOVEGROUND EXTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL STORAGE TANK #21</p>	<p>The storage of denatured ethanol will constitute a modification to an existing emissions unit and will be subject to District's NSR review.</p> <p>Therefore, equipment description cannot be changed as requested and it is advised that the facility submit an ATC application to allow the storage of denatured ethanol.</p>
N-758-6-2	8. Accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm ² per meter (10.01 in ² per foot) of tank diameter, and the width of any gap shall not exceed 3.81 cm (1.5	A records review indicates that this storage tank was constructed in 1961 (see Appendix, Attachment 5), and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this

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	inches). [40CFR 60.113b(b)(4)(i) and 63.11087(c)] Federally Enforceable Through Title V Permit	BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. Shell suggests adding the phrase "when storing gasoline" to the condition.	<p>tank without getting ATC first.</p> <p>Therefore, this tank is subject to 40 CFR Subpart BBBBBB which requires standards under 40 CFR 60 Subpart Kb. Since currently this tank can only store gasoline, it is not necessary to insert phrase "when storing gasoline" in any permit conditions at this time.</p>
N-758-6-2	11. Accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm ² per meter (1.0 inch ² per foot) of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm (1/2 inch). [District Rule 4623; 40CFR 60.113b(b)(4)(ii)(B) and 63.11087(c)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. Shell suggests adding the phrase "when storing gasoline" to the condition.	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first.</p> <p>Therefore, this tank is subject to 40 CFR Subpart BBBBBB which requires standards under 40 CFR 60 Subpart Kb. Since currently this tank can only store gasoline, it is not necessary to insert phrase "when storing gasoline" in any permit conditions at this time.</p>
N-758-6-2	33. Operator shall also perform gap measurements on primary seals during hydrostatic testing of the vessel. [40CFR 60.113b(b)(1)(i) and 63.11087(c)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. Shell suggests adding the phrase "when storing gasoline" to the condition.	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first.</p> <p>Therefore, this tank is subject to 40 CFR Subpart BBBBBB which requires standards under 40 CFR 60 Subpart Kb. Since currently</p>

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			<p>this tank can only store gasoline, it is not necessary to insert phrase "when storing gasoline" in any permit conditions at this time.</p>
N-758-6-2	<p>34. If unit is out of service for a period of one year or more, subsequent refilling with volatile organic liquid shall be considered initial fill in accordance with the conditions of this permit. [40CFR60.113b(b)(1)(iii) and 63.11087(c)] Federally Enforceable Through Title V Permit</p>	<p>A records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBB only applies to tanks storing gasoline. Shell suggests changing the wording as follows:</p> <p>"If unit is out of service for a period of one year or more, subsequent refilling with gasoline shall be considered initial fill in accordance with the conditions of this permit."</p>	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first.</p> <p>Therefore, this tank is subject to 40 CFR Subpart BBBB which requires standards under 40 CFR 60 Subpart Kb. Since currently the tank can only store gasoline, condition will be modified to refer to gasoline as proposed.</p>

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N-758-6-2	<p>35. Operator shall determine gap widths and gap areas in the primary and secondary seals using the following procedure: 1) Measure seal gaps, at one or more floating roof levels when the roof is floating off roof leg supports; 2) Measure seal gaps around entire circumference of the tank in each place where a 0.32 cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the tank wall and measure the circumferential distance of each such location; 3) Total surface area of each gap shall be determined by using probes of various widths to accurately measure the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance; and 4) Add the gap surface area of each gap location for the primary seal and the secondary seal individually. Divide the sum for each seal by the nominal diameter of the tank. [40 CFR 60.113b(b)(2), 60.113b(b)(3), and 63.11087(c)] Federally Enforceable Through Title V Permit</p>	<p>A records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBB only applies to tanks storing gasoline. Shell suggests adding the phrase "when storing gasoline" to the condition.</p> <p>Also, this condition only applies to the measurement of gaps for the purposes of determining compliance with Subpart Kb/BBBB. Shell suggests modifying the first phrase as follows:</p> <p>"Operator shall determine gap widths and gap areas for compliance with 40 CFR 60.113b(b)(2) and (3) in the primary and secondary seals using the following procedure:"</p>	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first.</p> <p>Therefore, this tank is subject to 40 CFR Subpart BBBB which requires standards under 40 CFR 60 Subpart Kb. Since currently this tank can only store gasoline, it is not necessary to insert phrase "when storing gasoline" in any permit conditions at this time.</p> <p>The District also concurs that this condition applies to the gap measurement for the purposes of determining compliance with Subparts Kb/BBBB, the condition has been modified as follows:</p> <p>"Operator shall determine gap widths and gap areas for compliance with 40 CFR 60.113b(b)(2) and (3) in the primary and secondary seals using the following procedure: ..."</p>
N-758-6-2	<p>36. If the seals do not meet the required specifications of this permit, operator shall repair or empty the storage vessel within 45 days of identification. [40CFR 60.113b(b)(4) and 63.11087(c)] Federally Enforceable Through Title V Permit</p>	<p>Does the 45-day repair period apply to any of the above seal conditions?</p>	<p>§60.113b(b)(4) requires that the owner or operator shall make necessary repairs or empty the storage vessel within 45 days of identification in any inspection <u>for seals not meeting the requirements listed in (b)(4) (i) and (ii) of §60.113b</u>. Thus the 45-day repair period applies to seal requirements listed in §60.113b(b)(4)(i) and (ii). Therefore, the</p>

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			<p>condition will be modified as follows for clarification:</p> <p>"If the seals do not meet the required specifications of 40 CFR 60.113b(b)(4)(i) and (ii), operator shall repair or empty the storage vessel within 45 days of identification. [40 CFR 63.11087(c)]</p>
N-758-6-2	<p>37. Operator shall notify the APCO 30 days in advance of any gap measurements required by this permit to afford the APCO opportunity to have an observer present. [40CFR 60.113b(b)(5) and 63.11087(c)] Federally Enforceable Through Title V Permit</p>	<p>A records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. Rule 4623 does not require notification prior to performing gap measurements. Condition should be reworded to clarify that notification is only prior to Kb gap measurements, not Rule 4623 gap measurements. Also, the tank is only subject to Kb gap standards when storing gasoline. Suggested language for this condition:</p> <p>"Operator shall notify the APCO 30 days in advance of any gap measurements required by 40 CFR 63.11092(e)(1) and 40 CFR 60.113b(1) to afford the APCO opportunity to have an observer present. [40CFR 60.113b(b)(5) and 63.11087(c)] Federally Enforceable Through Title V Permit "</p>	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. However, this tank is subject to 40 CFR Subpart BBBB which requires standards under 40 CFR 60 Subpart Kb.</p> <p>The District also concurs that this condition applies to the gap measurement for the purposes of determining compliance with Subparts Kb/BBBB and not for Rule 4623; therefore, the condition has been modified as follows for clarification:</p> <p>"Operator shall notify the APCO 30 days in advance of any gap measurements required by 40 CFR 63.11092(e)(2) and 40 CFR 60.113b(b) to afford the APCO opportunity to have an observer present. [40 CFR 63.11087(c)]"</p>
N-758-6-2	<p>38. If the external floating roof has defects, or the primary seal or secondary seal has holes, tears, or other openings in the seal or seal fabric, the operator shall repair the items as necessary so that none of these conditions exist before filling or refilling the</p>	<p>This requirement applies to visual inspections that are to be performed each time the vessel is emptied and degassed. Condition should be clarified to reflect this. Also, since this is a BBBB requirement, it only applies if the tank is refilled with gasoline. Suggested</p>	<p>Since this tank currently can only store gasoline, condition will be modified to change VOL to gasoline. The District also concurs that the visual inspections required by this section are to be performed each time the vessel is emptied and degassed.</p>

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	storage vessel with VOL. [40CFR 60.113b(b)(6)(i) and 63.11087(c)] Federally Enforceable Through Title V Permit	wording: "After the tank has been emptied and degassed, if the external floating roof has defects, or the primary seal or secondary seal has holes, tears, or other openings in the seal or seal fabric, the operator shall repair the items as necessary so that none of these conditions exist before filling or refilling the storage vessel with gasoline. [40CFR 60.113b(b)(6)(i) and 63.11087(c)] Federally Enforceable Through Title V Permit"	Therefore, the condition will be revised as proposed for clarification.
N-758-6-2	39. For all visual inspections required by this permit, the operator shall notify the APCO in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the APCO the opportunity to inspect the storage vessel prior to refilling, except when notification is specifically allowed otherwise by this permit. [40CFR 60.113b(b)(6)(ii) and 63.11087(c)] Federally Enforceable Through Title V Permit	This requirement applies to visual inspections that are to be performed each time the vessel is emptied and degassed. Condition should be clarified to reflect this. Also, since this is a BBBBBB requirement, it only applies if the tank is refilled with gasoline. Suggested wording: "For all visual inspections required by 40 CFR 63.11092(e)(1), the operator shall notify the APCO in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the APCO the opportunity to inspect the storage vessel prior to refilling, except when notification is specifically allowed otherwise by this permit. [40CFR 60.113b(b)(6)(ii) and 63.11087(c)] Federally Enforceable Through Title V Permit"	Since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first. The District also concurs that the visual inspections required by this section are to be performed each time the vessel is emptied and degassed. Therefore, the condition will be revised as follows for clarification: "For all visual inspections required by 40 CFR 63.11092(e)(2), the operator shall notify the APCO in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the APCO the opportunity to inspect the storage vessel prior to refilling, except when notification is specifically allowed otherwise by this permit. [40 CFR 63.11087(c)]"

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N-758-6-2	<p>40. If a visual inspection required by this permit is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall notify the APCO at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so it is received by the APCO at least 7 days prior to the refilling. [40CFR 60.113b(b)(6)(ii) and 63.11087(c)] Federally Enforceable Through Title V Permit</p>	<p>This requirement applies to visual inspections that are to be performed each time the vessel is emptied and degassed. Condition should be clarified to reflect this. Also, since this is a BBBBBB requirement, it only applies if the tank is refilled with gasoline. Suggested wording:</p> <p>"If a visual inspection required by 40 CFR 63.11092(e)(1) is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall notify the APCO at least 7 days prior to the refilling of the storage vessel...."</p>	<p>Since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first. The District also concurs that the visual inspections required by this section are to be performed each time the vessel is emptied and degassed. Therefore, the condition will be revised as follows for clarification:</p> <p>"If a visual inspection required by 40 CFR 63.11092(e)(2) is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall notify the APCO at least 7 days prior to the refilling of the storage vessel...."</p>
N-758-6-2	<p>41. Operator shall record the vessel on which the measurement was performed, date of the seal gap measurement, raw data obtained in the measurement process in accordance with the conditions of this permit. [40CFR 60.115b(b)(3) and 63.11087(e)] Federally Enforceable Through Title V Permit</p>	<p>A records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. Shell suggests adding the phrase "when storing gasoline" to the condition.</p>	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first.</p> <p>Therefore, this tank is subject to 40 CFR Subpart BBBBBB which requires standards stated under 40 CFR 60 Subpart Kb and it is not necessary to insert phrase "when storing gasoline" in any permit conditions at this time.</p>

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N-758-6-2	<p>42. Within 60 days of performing the seal gap measurements required by this permit, the operator shall furnish the APCO with a report containing the date of measurement, raw data obtained in the measurement process, and all such gap calculations as required by this permit. [40CFR 60.115b(b)(2) and 63.11087(e)] Federally Enforceable Through Title V Permit</p>	<p>A records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. BBBBBB requires gap measurements to be reported with the semi-annual compliance report, not within 60 days of performing measurements. Shell suggests rewording the condition as follows:</p> <p>"Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements: the date of measurement, raw data obtained in the measurement process, and all such gap calculations as required by 40 CFR 63.11092(e)(1). [40CFR 60.115b(b)(2) and 63.11087(e)] Federally Enforceable Through Title V Permit"</p>	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. District also concurs that this tank is subject to 40 CFR 60 Subpart BBBBBB that requires gap measurements to be reported with the semi-annual compliance report, not within 60 days of performing measurements as required by Subpart Kb. Therefore, condition has been modified as follows:</p> <p>"Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements: the date of measurement, raw data obtained in the measurement process, and all such gap calculations as required by 40 CFR 63.11092(e)(2). [40 CFR 63.11087(e)]"</p>

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N-758-6-2	43. After each seal gap measurement that detects gaps exceeding any limit of this permit, the operator shall submit a report to the APCO within 30 days of the inspection. The report will identify the vessel and contain the date of measurement, raw data obtained in the measurement process, all such gap calculations as required by this permit, and the date the vessel was emptied or the repairs made and the date of repair. [40CFR 60.115b(b)(4) and 63.11087(e)] Federally Enforceable Through Title V Permit	<p>This storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. It is not subject to Subpart Kb, other than through reference by 40 CFR 63 Subpart BBBB. BBBB requires gap measurements and repairs to be reported with the semi-annual compliance report, not within 30 days of inspection. Also, BBBB only applies to tanks storing gasoline. Shell suggests rewording the condition as follows:</p> <p>"Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements that exceeded 40 CFR 60.113b(4) limits: the date of measurement, raw data obtained in the measurement process, all such gap calculations as required by 40 CFR 63.1192(e)(1), and the date the vessel was emptied or the repairs made and the date of repair. [40CFR 60.115b(b)(2) and 63.11087(e)] Federally Enforceable Through Title V Permit"</p>	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. District also concurs that this tank is subject to 40 CFR 60 Subpart BBBB that requires gap measurements to be reported with the semi-annual compliance report, not within 30 days of inspection as required by Subpart Kb. Therefore, condition has been modified as follows:</p> <p>"Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements that exceeded 40 CFR 60.113b(4) limits: the date of measurement, raw data obtained in the measurement process, all such gap calculations as required by 40 CFR 63.1192(e)(2), and the date the vessel was emptied or the repairs made and the date of repair. [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit"</p>
N-758-6-2	46. {2630} Operator shall maintain a record showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The record shall be maintained for the life of the vessel. [40 CFR 60.116b(b)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. Therefore, this condition has been removed from the draft permit.
N-758-6-2	47. Operator shall keep a record of the liquids stored in this container, the period of storage, and the maximum true vapor	A records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. Therefore, this

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	pressure (TVP) of that liquid during the respective storage period. [40 CFR 60.116b(c)] Federally Enforceable Through Title V Permit	60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	condition has been removed from the draft permit.
N-758-6-2	48. {2623} Maximum true vapor pressure, for crude oil or refined petroleum products, may be determined from nomographs contained in API Bulletin 2517, by using the typical Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product, unless the APCO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.116b(e)(2)(i)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. Therefore, this condition has been removed from the draft permit.
N-758-6-2	49. {2624} Operator shall determine the true vapor pressure of each type of crude oil with a Reid vapor pressure less than 2.0 psia or whose physical properties preclude determination by the recommended method from available data and record if the true vapor pressure is greater than 0.5 psia. [40 CFR 60.116b(e)(2)(ii)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. Additionally, this tank cannot store crude oil and this condition is unnecessary and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. Therefore, this condition has been removed from the draft permit.

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-6-2	52. The permittee shall maintain all records required by this permit on-site for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 and 40 CFR 60.116b(a)] Federally Enforceable Through Title V Permit	<p>Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below:</p> <p>"Retention of 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."</p> <p>Also, a records review indicates that this storage tank was constructed in 1961, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that reference to 40 CFR 60.116b(a) be changed to 40 CFR 63.11094(a).</p>	<p>The word "onsite" was removed from the condition as requested.</p> <p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. However, the tank is also subject to 40 CFR 63.11094(a) which requires this tank to meet the same record keeping requirements as stated under 40 CFR 60.115b(b). Therefore, condition reference changed to 40 CFR 63.11094(a).</p>
N-758-7-1	5. {2623} Maximum true vapor pressure, for crude oil or refined petroleum products, may be determined from nomographs contained in API Bulletin 2517, by using the typical Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product, unless the APCO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.116b(e)(2)(i)] Federally Enforceable Through Title V Permit	<p>A records review indicates that this storage tank was constructed in 1940 (see Appendix, Attachment 6), and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.</p>	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. Therefore, this condition has been removed from the draft permit.</p>

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-7-1	6. {2624} Operator shall determine the true vapor pressure of each type of crude oil with a Reid vapor pressure less than 2.0 psia or whose physical properties preclude determination by the recommended method from available data and record if the true vapor pressure is greater than 0.5 psia. [40 CFR 60.116b(e)(2)(ii)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1940, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. Additionally, this tank cannot store crude oil and this condition is unnecessary and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. Therefore, this condition has been removed from the draft permit.
N-758-7-1	9. {2630} Operator shall maintain a record showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The record shall be maintained for the life of the vessel. [40 CFR 60.116b(b)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1940, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. Therefore, this condition has been removed from the draft permit.
N-758-7-1	10. The permittee shall maintain all records required by this permit on-site for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 and 40 CFR 60.116b(a)] Federally Enforceable Through Title V Permit	<p>Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below:</p> <p>"Retention of 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."</p> <p>Also, a records review indicates that this storage tank was constructed in 1940, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that reference to 40 CFR 60.116b(a) be changed to 40 CFR 63.11094(a).</p>	<p>The word "onsite" was removed from the condition as requested.</p> <p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1940. However, the tank is also subject to 40 CFR 63.11094(a) which requires this tank to meet the same record keeping requirements as stated under 40 CFR 60.115b(c). Therefore, condition reference changed to 40 CFR 63.11094(a).</p>

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-9-1	3. The facility shall obtain the vapor tightness documentation specified in 40 CFR Part 60.505(b) for each gasoline tank truck that is to be loaded at the facility. [40 CFR Part 60.502(e)(1)] Federally Enforceable Through Title V Permit	Shell has reviewed records related to the load rack and not found documentation that Subpart XX is applicable. The load rack was constructed well before 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX and requests that this condition be removed.	The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX and this condition has been removed from the draft permit.
N-758-9-1	4. 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 Part 60.505(a) and (b), and 40 CFR 63.11094(b)] Federally Enforceable Through Title V Permit	<p>Shell has reviewed records related to the load rack and not found documentation that Subpart XX is applicable. The load rack was constructed well before 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX. 40 CFR 63.11094(b)(2) requires the vapor tightness certification documentation file to be "kept up-to-date." Suggested language for condition:</p> <p>"Documentation attesting to the vapor tightness of each truck loaded with gasoline shall be kept up-to-date. (2) The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information:</p> <p>(i) Name of test: Annual Certification Test— Method 27 or Periodic Railcar Bubble Leak Test Procedure.</p> <p>(ii) Cargo tank owner's name and address.</p>	<p>The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX. Reference of the Subpart XX has been removed and the condition modified in accordance with 40 CFR 63.11094(b) as follows:</p> <p>"Documentation attesting to the vapor tightness of each truck loaded with gasoline shall be kept up-to-date. The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information: (i) name of test: annual certification test-Method 27 or periodic Railcar Bubble Leak Test procedure; (ii) cargo tank owner's name and address; (iii) cargo tank identification number; (iv) test location and date; (v) tester name and signature; (vi) witnessing inspector, if any: name, signature, and affiliation; (vii) vapor tightness repair: nature of repair work and</p>

Permit Unit	Draft Condition	Comment to District	District's Response
		(iii) Cargo tank identification number. (iv) Test location and date. (v) Tester name and signature. (vi) Witnessing inspector, if any: Name, signature, and affiliation. (vii) Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing. (viii) Test results: Test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition. [40 CFR 63.11094(b)] Federally Enforceable Through Title V Permit"	when performed in relation to vapor tightness testing; (viii) test results: test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition. [40 CFR 63.11094(b)]"
N-758-9-1	9. Each calendar month, the vapor collection system, the vapor processing system and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for organic liquid and organic vapor leaks. For the purpose of this condition, detection methods incorporating sight, sound and smell are acceptable. [40 CFR Part 60.502(j) and 40 CFR Part 63.11089(a)] Federally Enforceable Through Title V Permit	Shell has reviewed records related to the load rack and not found documentation that Subpart XX is applicable. The load rack was constructed well before 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX; reference to 40 CFR Part 60.502(j) should be removed.	The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX and the reference to 40 CFR Part 60.502(j) has been removed from the draft permit.
N-758-9-1	10. All leaking components shall be repaired or replaced within 72 hours of discovery. 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 replaced equipment shall be re-inspected the first time the equipment is in operation after the repair or replacement. [District	Shell has reviewed records related to the load rack and not found documentation that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX; reference to 40 CFR Part 60.502(j) should be removed.	The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX and the reference to 40 CFR Part 60.502(j) has been removed from the draft permit.

Permit Unit	Draft Condition	Comment to District	District's Response
	Rule 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit		
N-758-9-1	13. 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 3 calendar days after discovery of the leak; 7) the date of successful repair of the leak; and 8) inspector name and signature. [District Rule 4624; 40 CFR 60.505(c) and 63.11089(g)] Federally Enforceable Through Title V Permit	Shell has reviewed records related to the load rack and not found documentation that Subpart XX is applicable. The load rack was constructed well before 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX; reference to 40 CFR Part 60.502(j) should be removed. Also the inspector name and signature is a requirement of Subpart XX but not BBBB; it should therefore be removed.	The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX. The condition has been modified as follows in accordance with 40 CFR 63.11094(e): "The owner or operator shall maintain a log book for each leak that is detected that contains the following information: 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 if the leak is not repaired within 15 days; and 7) the date of successful repair of the leak. [District Rule 4624 and 40 CFR 63.11094(e)]"

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-9-1	15. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 4624; 40 CFR 60.505 and 63.11094(a)] Federally Enforceable Through Title V Permit	<p>Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below:</p> <p>"Retention of 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."</p> <p>A records review indicates that the load rack was constructed prior to 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX; reference to 40 CFR 60.505 should be removed.</p>	<p>The word "onsite" was removed from the condition as requested.</p> <p>The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX and the reference to 40 CFR 60.505 has been removed from the draft permit.</p>
N-758-10-2	3. The facility shall obtain the vapor tightness documentation specified in 40 CFR Part 60.505(b) for each gasoline tank truck that is to be loaded at the facility. [40 CFR Part 60.502(e)(1)] Federally Enforceable Through Title V Permit	<p>Shell has reviewed records related to the load rack and not found documentation that Subpart XX is applicable. The load rack was constructed well before 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX and requests that this condition be removed.</p>	<p>The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX and this condition has been removed from the draft permit.</p>

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-10-2	<p>4. 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 Part 60.505(a) and (b), and 40 CFR 63.11094(b)] Federally Enforceable Through Title V Permit</p>	<p>A records review indicates that the load rack was constructed prior to 1980. The load rack was constructed well before 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX. 40 CFR 63.11094(b)(2) requires the vapor tightness certification documentation file to be "kept up-to-date." Suggested language for condition:</p> <p>"Documentation attesting to the vapor tightness of each truck loaded with gasoline shall be kept up-to-date. (2) The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information:</p> <ul style="list-style-type: none"> (i) Name of test: Annual Certification Test— Method 27 or Periodic Railcar Bubble Leak Test Procedure. (ii) Cargo tank owner's name and address. (iii) Cargo tank identification number. (iv) Test location and date. (v) Tester name and signature. (vi) Witnessing inspector, if any: Name, signature, and affiliation. (vii) Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing. (viii) Test results: Test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; 	<p>The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX. Reference of the Subpart XX has been removed and the condition modified in accordance with 40 CFR 63.11094(b) as follows:</p> <p>"Documentation attesting to the vapor tightness of each truck loaded with gasoline shall be kept up-to-date. The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information: (i) name of test: annual certification test-Method 27 or periodic Railcar Bubble Leak Test procedure; (ii) cargo tank owner's name and address; (iii) cargo tank identification number; (iv) test location and date; (v) tester name and signature; (vi) witnessing inspector, if any: name, signature, and affiliation; (vii) vapor tightness repair: nature of repair work and when performed in relation to vapor tightness testing; (viii) test results: test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak</p>

Permit Unit	Draft Condition	Comment to District	District's Response
		and leak definition. [40 CFR 63.11094(b)] Federally Enforceable Through Title V Permit"	definition. [40 CFR 63.11094(b)]"
N-758-10-2	9. Each calendar month, the vapor collection system, the vapor processing system and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for organic liquid and organic vapor leaks. For the purpose of this condition, detection methods incorporating sight, sound and smell are acceptable. [40 CFR Part 60.502(j) and 40 CFR Part 63.11089(a)] Federally Enforceable Through Title V Permit	Shell has reviewed records related to the load rack and not found documentation that Subpart XX is applicable. The load rack was constructed well before 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX; reference to 40 CFR Part 60.502(j) should be removed.	The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX and the reference to 40 CFR Part 60.502(j) has been removed from the draft permit.
N-758-10-2	10. All leaking components shall be repaired or replaced within 72 hours of discovery. 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 replaced equipment shall be re-inspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624 and 40 CFR 60.502(j)] Federally Enforceable Through Title V Permit	Shell has reviewed records related to the load rack and not found documentation that Subpart XX is applicable. The load rack was constructed well before 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX; reference to 40 CFR Part 60.502(j) should be removed.	The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX and the reference to 40 CFR Part 60.502(j) has been removed from the draft permit.

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-10-2	13. 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 3 calendar days after discovery of the leak; 7) the date of successful repair of the leak; and 8) inspector name and signature. [District Rule 4624; 40 CFR 60.505(c) and 63.11089(g)] Federally Enforceable Through Title V Permit	Shell has reviewed records related to the load rack and not found documentation that Subpart XX is applicable. The load rack was constructed well before 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX; reference to 40 CFR Part 60.502(j) should be removed. Also the inspector name and signature is a requirement of Subpart XX but not BBBBBB; it should therefore be removed.	The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX. The condition has been modified as follows in accordance with 40 CFR 63.11094(e): "The owner or operator shall maintain a log book for each leak that is detected that contains the following information: 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 if the leak is not repaired within 15 days; and 7) the date of successful repair of the leak. [District Rule 4624 and 40 CFR 63.11094(e)]"
N-758-10-2	14. The permittee shall keep records of the daily gasoline throughput, the cumulative annual gasoline throughput, in gallons. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit	Rule 4624 does not require annual throughput records. Shell requests that the phrase "the cumulative annual gasoline throughput" be removed from this condition.	Since this condition has a reference of District Rule 2201 reference, it cannot be modified during initial Title V project. The facility is advised to submit an ATC application for the proposed modification of the condition.
N-758-10-2	15. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070, 2201,	Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be	The word "onsite" was removed from the condition as requested. The facility submitted documents (see

Permit Unit	Draft Condition	Comment to District	District's Response
	and 4624; 40 CFR 60.505 and 63.11094(a)] Federally Enforceable Through Title V Permit	<p>maintained onsite - see recordkeeping requirement from Section 9.4.2 below:</p> <p>"Retention of 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."</p> <p>A records review indicates that the load rack was constructed prior to 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX; reference to 40 CFR 60.505 should be removed.</p>	Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX and the reference to 40 CFR 60.505 has been removed from the draft permit.
N-758-11-2	9. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit	<p>Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below:</p> <p>"Retention of 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."</p>	The word "onsite" was removed from the condition as requested.
N-758-12-3	Equipment Description: ONE 10,000 GALLON ABOVEGROUND GASOLINE ADDITIVE (PDP-4000) STORAGE TANK	<p>Shell requests to modify the current description by removing the phrase "(PDP-4000)." Please update description to the following:</p> <p>ONE 10,000 GALLON ABOVEGROUND GASOLINE ADDITIVE STORAGE TANK #10</p>	<p>Since current permit emission are based on a specific additive PDP-4000, the removal of this specific additive will constitute a modification to an existing emissions unit and will be subject to District's NSR review.</p> <p>Therefore, equipment description cannot be changed as requested and it is advised that</p>

Permit Unit	Draft Condition	Comment to District	District's Response
			the facility submit an ATC application for the requested change.
N-758-12-3	12. All records required to be maintained by this permit shall be maintained for a period of at least five years and shall be made readily available for District inspection upon request. [District Rule 4623] Federally Enforceable Through Title V Permit	Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below: "Retention of 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."	The word "onsite" was removed from the condition as requested.
N-758-13-8	2. The vapor collection and control system shall operate such that the pressure in the delivery tank being loaded shall not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624 and 40 CFR Part 60.502(h)] Federally Enforceable Through Title V Permit	A records review indicates that the load rack was constructed prior to 1980, and none of the current permits associated with the load rack or vapor recovery system indicate that Subpart XX is applicable. Shell believes the load rack is not subject to 40 CFR 60 Subpart XX; reference to 40 CFR 60.502(h) should be removed.	The facility submitted documents (see Appendix F) that shows that the loading rack was present before 1980; therefore, District concurs that the loading rack is not subject to 40 CFR 60 Subpart XX and the reference to 40 CFR 60.502(h) has been removed from the draft permit.
N-758-14-3	Equipment Description: ONE 689,136 GALLON (16,408 BBL) ABOVEGROUND WELDED EXTERNAL FLOATING ROOF GASOLINE STORAGE TANK (TANK #18) WITH A MECHANICAL SHOE TYPE PRIMARY SEAL AND A SECONDARY WIPE SEAL	Shell requests that the equipment description be changed to allow for storage of denatured ethanol, as is the case for N-758-4 and N-758-5. Equipment description should read: ONE 689,136 GALLON (16,408 BBL) ABOVEGROUND WELDED EXTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL STORAGE TANK (TANK #18) WITH A MECHANICAL SHOE TYPE PRIMARY SEAL AND	The storage of denatured ethanol will constitute a modification to an existing emissions unit and will be subject to District's NSR review. Therefore, equipment description cannot be changed as requested and it is advised that facility submit an ATC application to allow the storage of denatured ethanol.

Permit Unit	Draft Condition	Comment to District	District's Response
		A SECONDARY WIPER SEAL	
N-758-14-3	8. Accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm ² per meter (10.01 in ² per foot) of tank diameter, and the width of any gap shall not exceed 3.81 cm (1.5 inches). [40CFR 60.113b(b)(4)(i)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1953 (see Appendix, Attachment 7), and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. Shell suggests adding the phrase "when storing gasoline" to the condition.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first. Therefore, this tank is subject to 40 CFR Subpart BBBBBB which requires standards under 40 CFR 60 Subpart Kb. Since currently this tank can only store gasoline, it is not necessary to insert phrase "when storing gasoline" in any permit conditions at this time.
N-758-14-3	11. Accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm ² per meter (1.0 inch ² per foot) of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm (1/2 inch). [District Rule 4623 and 40CFR 60.113b(b)(4)(ii)(B)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. Shell suggests adding the phrase "when storing gasoline" to the condition.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first. Therefore, this tank is subject to 40 CFR Subpart BBBBBB which requires standards under 40 CFR 60 Subpart Kb. Since currently

Permit Unit	Draft Condition	Comment to District	District's Response
			this tank can only store gasoline, it is not necessary to insert phrase "when storing gasoline" in any permit conditions at this time.
N-758-14-3	33. {2752} Operator shall also perform gap measurements on primary seals during hydrostatic testing of the vessel. [40CFR 60.113b(b)(1)(i)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. Shell suggests adding the phrase "when storing gasoline" to the condition.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first. Therefore, this tank is subject to 40 CFR Subpart BBBBBB which requires standards under 40 CFR 60 Subpart Kb. Since currently this tank can only store gasoline, it is not necessary to insert phrase "when storing gasoline" in any permit conditions at this time.
N-758-14-3	34. {2753} If unit is out of service for a period of one year or more, subsequent refilling with volatile organic liquid shall be considered initial fill in accordance with the conditions of this permit. [40CFR60.113b(b)(1)(iii)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. Shell suggests changing the wording as follows: "If unit is out of service for a period of one year or more, subsequent refilling with gasoline shall be considered initial fill in accordance with the conditions of this permit. [40CFR60.113b(b)(1)(iii)] Federally Enforceable	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first. Therefore, this tank is subject to 40 CFR Subpart BBBBBB which requires standards under 40 CFR 60 Subpart Kb. Since currently the tank can only store gasoline, condition will be modified to refer to gasoline as proposed.

Permit Unit	Draft Condition	Comment to District	District's Response
		Through Title V Permit"	
N-758-14-3	<p>35. {1225} Operator shall determine gap widths and gap areas in the primary and secondary seals using the following procedure: 1) Measure seal gaps, at one or more floating roof levels when the roof is floating off roof leg supports; 2) Measure seal gaps around entire circumference of the tank in each place where a 0.32 cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the tank wall and measure the circumferential distance of each such location; 3) Total surface area of each gap shall be determined by using probes of various widths to accurately measure the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance; and 4) Add the gap surface area of each gap location for the primary seal</p>	<p>A records review indicates that this storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. Shell suggests adding the phrase "when storing gasoline" to the condition.</p> <p>Also, this condition only applies to the measurement of gaps for the purposes of determining compliance with Subpart Kb/BBBBBB. Shell suggests modifying the first phrase as follows:</p> <p>"Operator shall determine gap widths and gap areas for compliance with 40 CFR 60.113b(b)(2) and (3) in the primary and</p>	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1961. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first.</p> <p>Therefore, this tank is subject to 40 CFR Subpart BBBBBB which requires standards under 40 CFR 60 Subpart Kb. Since currently this tank can only store gasoline, it is not necessary to insert phrase "when storing gasoline" in any permit conditions at this time.</p> <p>The District also concurs that this condition applies to the gap measurement for the purposes of determining compliance with Subparts Kb/BBBBBB, the condition has</p>

Permit Unit	Draft Condition	Comment to District	District's Response
	and the secondary seal individually. Divide the sum for each seal by the nominal diameter of the tank. [40 CFR 60.113b(b)(2) & 60.113b(b)(3)] Federally Enforceable Through Title V Permit	secondary seals using the following procedure:"	been modified as follows: "Operator shall determine gap widths and gap areas for compliance with 40 CFR 60.113b(b)(2) and (3) in the primary and secondary seals using the following procedure: ..."
N-758-14-3	36. {2763} If the seals do not meet the required specifications of this permit, operator shall repair or empty the storage vessel within 45 days of identification. [40CFR 60.113b(b)(4)] Federally Enforceable Through Title V Permit	Does the 45-day repair period apply to any of the above seal conditions?	§60.113b(b)(4) requires that the owner or operator shall make necessary repairs or empty the storage vessel within 45 days of identification in any inspection <u>for seals not meeting the requirements listed in (b)(4) (i) and (ii) of §60.113b</u> . Thus the 45-day repair period applies to seal requirements listed in §60.113b(b)(4)(i) and (ii). Therefore, the condition will be modified as follows for clarification: "If the seals do not meet the required specifications of 40 CFR 60.113b(b)(4)(i) and (ii), operator shall repair or empty the storage vessel within 45 days of identification. [40 CFR 63.11087(c)]

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-14-3	37. {2756} Operator shall notify the APCO 30 days in advance of any gap measurements required by this permit to afford the APCO opportunity to have an observer present. [40CFR 60.113b(b)(5)] Federally Enforceable Through Title V Permit	<p>Rule 4623 does not require notification prior to performing gap measurements. Condition should be reworded to clarify that notification is only prior to Kb gap measurements, not Rule 4623 gap measurements. Also, the tank is only subject to Kb gap standards when storing gasoline. Suggested language for this condition:</p> <p>"Operator shall notify the APCO 30 days in advance of any gap measurements required by 40 CFR 63.11092(e)(1) and 40 CFR 60.113b(1) to afford the APCO opportunity to have an observer present. [40CFR 60.113b(b)(5) and 63.11087(c)] Federally Enforceable Through Title V Permit "</p>	<p>District concurs that this condition applies to the gap measurement for the purposes of determining compliance with Subparts Kb/BBBBBB and not for Rule 4623; therefore, the condition has been modified as follows for clarification:</p> <p>"Operator shall notify the APCO 30 days in advance of any gap measurements required by 40 CFR 63.11092(e)(2) and 40 CFR 60.113b(b) to afford the APCO opportunity to have an observer present. [40 CFR 63.11087(c)]"</p>
N-758-14-3	38. {2757} If the external floating roof has defects, or the primary seal or secondary seal has holes, tears, or other openings in the seal or seal fabric, the operator shall repair the items as necessary so that none of these conditions exist before filling or refilling the storage vessel with VOL. [40CFR 60.113b(b)(6)(i)] Federally Enforceable Through Title V Permit	<p>This requirement applies to visual inspections that are to be performed each time the vessel is emptied and degassed. Condition should be clarified to reflect this. Also, since this is a BBBBBB requirement, it only applies if the tank is refilled with gasoline. Suggested wording:</p> <p>"After the tank has been emptied and degassed, if the external floating roof has defects, or the primary seal or secondary seal has holes, tears, or other openings in the seal or seal fabric, the operator shall repair the items as necessary so that none of these conditions exist before filling or refilling the storage vessel with gasoline. [40CFR 60.113b(b)(6)(i) and 63.11087(c)] Federally Enforceable Through Title V Permit"</p>	<p>Since this tank currently can only store gasoline, condition will be modified to change VOL to gasoline. The District also concurs that the visual inspections required by this section are to be performed each time the vessel is emptied and degassed. Therefore, the condition will be revised as proposed for clarification.</p>

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-14-3	<p>39. {2758} For all visual inspections required by this permit, the operator shall notify the APCO in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the APCO the opportunity to inspect the storage vessel prior to refilling, except when notification is specifically allowed otherwise by this permit. [40CFR 60.113b(b)(6)(ii)] Federally Enforceable Through Title V Permit</p>	<p>This requirement applies to visual inspections that are to be performed each time the vessel is emptied and degassed. Condition should be clarified to reflect this. Also, since this is a BBBBBB requirement, it only applies if the tank is refilled with gasoline. Suggested wording:</p> <p>"For all visual inspections required by 40 CFR 63.11092(e)(1), the operator shall notify the APCO in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the APCO the opportunity to inspect the storage vessel prior to refilling, except when notification is specifically allowed otherwise by this permit. [40CFR 60.113b(b)(6)(ii) and 63.11087(c)] Federally Enforceable Through Title V Permit"</p>	<p>Since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first. The District also concurs that the visual inspections required by this section are to be performed each time the vessel is emptied and degassed. Therefore, the condition will be revised as follows for clarification:</p> <p>"For all visual inspections required by 40 CFR 63.11092(e)(2), the operator shall notify the APCO in writing at least 30 days prior to the filling or refilling of each storage vessel to afford the APCO the opportunity to inspect the storage vessel prior to refilling, except when notification is specifically allowed otherwise by this permit. [40 CFR 63.11087(c)]"</p>
N-758-14-3	<p>40. {2759} If a visual inspection required by this permit is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall notify the APCO at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so it is received by the APCO at least 7 days prior to the refilling. [40CFR 60.113b(b)(6)(ii)] Federally Enforceable Through Title V Permit</p>	<p>This requirement applies to visual inspections that are to be performed each time the vessel is emptied and degassed. Condition should be clarified to reflect this. Also, since this is a BBBBBB requirement, it only applies if the tank is refilled with gasoline. Suggested wording:</p> <p>" If a visual inspection required by 40 CFR 63.11092(e)(1) is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall notify the APCO at least 7 days prior to the refilling of the storage vessel...."</p>	<p>Since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first. The District also concurs that the visual inspections required by this section are to be performed each time the vessel is emptied and degassed. Therefore, the condition will be revised as follows for clarification:</p> <p>"If a visual inspection required by 40 CFR 63.11092(e)(2) is not planned and the operator could not have known about the inspection 30 days in advance of refilling the tank, the operator shall notify the APCO at least 7 days prior to the refilling of the</p>

Permit Unit	Draft Condition	Comment to District	District's Response
			storage vessel...."
N-758-14-3	41. {2760} Operator shall record the vessel on which the measurement was performed, date of the seal gap measurement, raw data obtained in the measurement process in accordance with the conditions of this permit. [40CFR 60.115b(b)(3)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBB only applies to tanks storing gasoline. Shell suggests adding the phrase "when storing gasoline" to the condition.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. However, since equipment description specifically says that this is a gasoline storage tank, no liquid other than gasoline can be stored in this tank without getting ATC first. Therefore, this tank is subject to 40 CFR Subpart BBBB which requires standards stated under 40 CFR 60 Subpart Kb and it is not necessary to insert phrase "when storing gasoline" in any permit conditions at this time.

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-14-3	42. {2761} Within 60 days of performing the seal gap measurements required by this permit, the operator shall furnish the APCO with a report containing the date of measurement, raw data obtained in the measurement process, and all such gap calculations as required by this permit. [40CFR 60.115b(b)(2)] Federally Enforceable Through Title V Permit	<p>A records review indicates that this storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb. 40 CFR 63 Subpart BBBBBB requires operators to follow certain procedures in Subpart Kb, but Subpart BBBBBB only applies to tanks storing gasoline. BBBBBB requires gap measurements to be reported with the semi-annual compliance report, not within 60 days of performing measurements. Shell suggests rewording the condition as follows:</p> <p>"Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements: the date of measurement, raw data obtained in the measurement process, and all such gap calculations as required by 40 CFR 63.11092(e)(1). [40CFR 60.115b(b)(2) and 63.11087(e)] Federally Enforceable Through Title V Permit"</p>	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. District also concurs that this tank is subject to 40 CFR 60 Subpart BBBBBB that requires gap measurements to be reported with the semi-annual compliance report, not within 60 days of performing measurements as required by Subpart Kb. Therefore, condition has been modified as follows:</p> <p>"Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements: the date of measurement, raw data obtained in the measurement process, and all such gap calculations as required by 40 CFR 63.11092(e)(2). [40 CFR 63.11087(e)]"</p>

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-14-3	43. {2762} After each seal gap measurement that detects gaps exceeding any limit of this permit, the operator shall submit a report to the APCO within 30 days of the inspection. The report will identify the vessel and contain the date of measurement, raw data obtained in the measurement process, all such gap calculations as required by this permit, and the date the vessel was emptied or the repairs made and the date of repair. [40CFR 60.115b(b)(4)] Federally Enforceable Through Title V Permit	<p>This storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. It is not subject to Subpart Kb, other than through reference by 40 CFR 63 Subpart BBBB. BBBB requires gap measurements and repairs to be reported with the semi-annual compliance report, not within 30 days of inspection. Also, BBBB only applies to tanks storing gasoline. Shell suggests rewording the condition as follows:</p> <p>"Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements that exceeded 40 CFR 60.113b(4) limits: the date of measurement, raw data obtained in the measurement process, all such gap calculations as required by 40 CFR 63.1192(e)(1), and the date the vessel was emptied or the repairs made and the date of repair. [40CFR 60.115b(b)(2) and 63.11087(e)] Federally Enforceable Through Title V Permit"</p>	<p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. District also concurs that this tank is subject to 40 CFR 60 Subpart BBBB that requires gap measurements to be reported with the semi-annual compliance report, not within 30 days of inspection as required by Subpart Kb. Therefore, condition has been modified as follows:</p> <p>"Within 30 days of the end of each semi-annual period, the operator shall include in the report required by 40 CFR 63.11095(a) the following information regarding gap measurements that exceeded 40 CFR 60.113b(4) limits: the date of measurement, raw data obtained in the measurement process, all such gap calculations as required by 40 CFR 63.1192(e)(2), and the date the vessel was emptied or the repairs made and the date of repair. [40 CFR 63.11087(e)] Federally Enforceable Through Title V Permit"</p>
N-758-14-3	46. {2630} Operator shall maintain a record showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. The record shall be maintained for the life of the vessel. [40 CFR 60.116b(b)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. Therefore, this condition has been removed from the draft permit.
N-758-14-3	47. Operator shall keep a record of the liquids stored in this container, the period of storage, and the maximum true vapor	A records review indicates that this storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. Therefore, this

Permit Unit	Draft Condition	Comment to District	District's Response
	pressure (TVP) of that liquid during the respective storage period. [40 CFR 60.116b(c)] Federally Enforceable Through Title V Permit	60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	condition has been removed from the draft permit.
N-758-14-3	48. {2623} Maximum true vapor pressure, for crude oil or refined petroleum products, may be determined from nomographs contained in API Bulletin 2517, by using the typical Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product, unless the APCO specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.116b(e)(2)(i)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. Therefore, this condition has been removed from the draft permit.
N-758-14-3	49. {2624} Operator shall determine the true vapor pressure of each type of crude oil with a Reid vapor pressure less than 2.0 psia or whose physical properties preclude determination by the recommended method from available data and record if the true vapor pressure is greater than 0.5 psia. [40 CFR 60.116b(e)(2)(ii)] Federally Enforceable Through Title V Permit	A records review indicates that this storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that this condition be removed.	District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. Therefore, this condition has been removed from the draft permit.

Permit Unit	Draft Condition	Comment to District	District's Response
N-758-14-3	52. The permittee shall maintain all records required by this permit on-site for a period of at least five years and shall made them readily available for District inspection upon request. [District Rule 4623 and 40 CFR 60.116b(a)] Federally Enforceable Through Title V Permit	<p>Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below:</p> <p>"Retention of 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."</p> <p>Also, a records review indicates that this storage tank was constructed in 1953, and the previous permit did not indicate that 40 CFR 60 Subpart Kb was applicable. Shell believes this tank is not subject to Subpart Kb and requests that reference to 40 CFR 60.116b(a) be changed to 40 CFR 63.11094(a).</p>	<p>The word "onsite" was removed from the condition as requested.</p> <p>District concurs that the tank is not subject to 40 CFR 60 Subpart Kb, as it was constructed in 1953. However, the tank is also subject to 40 CFR 63.11094(a) which requires this tank to meet the same record keeping requirements as stated under 40 CFR 60.115b(b). Therefore, condition reference changed to 40 CFR 63.11094(a).</p>
N-758-15-1	5. All records shall be maintained on site for a period of at least five years and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit	<p>Shell requests the removal of the word "onsite." Keeping all records onsite is burdensome and unnecessary. District Rule 2520 does not require records to be maintained onsite - see recordkeeping requirement from Section 9.4.2 below:</p> <p>"Retention of 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."</p>	<p>The word "onsite" was removed from the condition as requested.</p>

Attachment F

FACILITY DOCUMENTS FOR EQUIPMENT INSTALLATION DATES

Appendix – Historical Documentation of Storage Tanks

Attachment	Permit #	Tank ID
1	N-758-1	12
2	N-758-2	13
3	N-758-3	14
4	N-758-5	20
5	N-758-6	21
6	N-758-7	17
7	N-758-14	18

Attachment 1

N-758-1 (Tank 12)

API 653 tank inspection report excerpt (see p. 4 for tank construction date)

Above Ground Storage Tank Inspection Report

In accordance with API 653

**Shell Oil Products, US
Tank ST-12
In Service Inspection
Stockton, CA**

November 6, 2008

Report No. 180393-B5647 1/1

Prepared By:

CONAM 
Inspection & Engineering Services, Inc.

3985 Teal Court
Benicia, California 94510
(707) 746-5870



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1.0 Job Information

Job Location	Shell Oil Products, US
	3515 Navy Drive
	Stockton, CA 95206
Customer Representative	Dave Spencer
Customer Phone Number	310-816-2121
Job Charge Number	10099049
Report Number	180393-B5647 1/1
Conam Job No.	180393-B5647
Inspection Personnel Provided	Ed Beaver
	API 653 Certified Inspector
	Certification No. 1229



2.0 Tank Inspection Data Sheet

General:

Tank Number	ST-12
Owner	Shell Oil Products, US
Design Standard	Unknown
Tank Location	Stockton, CA
Product	Transmix
Specific Gravity	0.80
Manufacturer	Unknown
Manufacture Date	1940
Cathodic Protection	No
Data Plate Present	No
Data Plate Condition	Not Applicable

Dimensions:

Diameter (ft.)	18.00
Height (ft.)	30.00
Capacity Gross (bbls.)	1,359.68
Capacity Nominal (bbls.)	1,356.00 per data on tank

Geometry:

Foundation	Concrete Pad
Bottom	Lap Welded
Shell	Butt Welded
Roof Type	Fixed Cone Roof
Primary Seal	Not Applicable
Secondary Seal	Not Applicable

Access:

Stairway	None
Roof Access	Yes - from cat walk

Coatings:

Bottom	Unknown
Shell	External White
Roof	External White

Attachment 2

N-758-2 (Tank 13)

API 653 tank inspection report excerpt (see p. 4 for tank construction date)

Above Ground Storage Tank Inspection Report

In accordance with API 653

**Shell Oil Products, US
Tank 13
In Service Inspection
Stockton, CA**

November 15, 2007

Report No. 135546 1/6

Prepared By:



Conam - PRI
3985 Teal Court
Benicia, California 94510
(707) 746-5870



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1.0 Job Information

Job Location	Shell Oil Products, US
	Navy Drive
	Stockton, CA 95206
Customer Representative	Dave Spencer
Customer Phone Number	310-629-8830
Job Charge Number	10091719
Report Number	135546 1/6
PRI Job No.	135546
Inspection Personnel Provided	Gerald Allen
	API 653 Certified Inspector
	Certification No. 28542



2.0 Tank Inspection Data Sheet

General:

Tank Number	13
Owner	Shell Oil Products, US
Design Standard	API 12C
Tank Location	Stockton, CA
Product	Waste Water
Specific Gravity	1.00
Manufacturer	Unknown
Manufacture Date	1936
Cathodic Protection	Yes
Data Plate Present	No
Data Plate Condition	N/A

Dimensions:

Diameter (ft.)	11.60
Height (ft.)	32.00
Capacity Gross (bbls.)	0,602.33
Capacity Nominal (bbls.)	600.00

Geometry:

Foundation	Concrete Pad
Bottom	Lap Welded
Shell	Butt Welded
Roof Type	Fixed Cone Roof
Primary Seal	Not Applicable
Secondary Seal	Not Applicable

Access:

Stairway	Catwalk
Roof Access	Yes

Coatings:

Bottom	Unknown
Shell	External White
Roof	External White

Attachment 3

N-758-3 (Tank 14)

API 653 tank inspection report excerpt (see p. 4 for tank construction date)

Above Ground Storage Tank Inspection Report

In accordance with API 653

**Shell Oil Products, US
Tank 14
Out of Service Inspection
Stockton, CA**

June 30, 2010 to July 2, 2010

Report No. 257125/B9444 1/1

Prepared By:



3985 Teal Court
Benicia, California 94510
(707) 746-5870



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1.0 Job Information

Job Location	Shell Oil Products, US
	3515 Navy Drive
	Stockton, CA 95206
Customer Representative	Malou Baluyut
Customer Phone Number	310-816-2078
Job Charge Number	257125/B9444
Report Number	257125/B94441/1
Mistras Job No.	257125/B9444
Inspection Personnel Provided	William Ensign
	API 653 Certified Inspector
	Certification No. 6115
	David Nevins
	Level II Technician
	UTT
	Tyler Deporto
	NDE II Technician
	UTT/MT/PT
	Alfred Anderson
	Level II Technician
	UTT/MT/PT



2.0 Tank Inspection Data Sheet

General:

Tank Number	14
Owner	Shell Oil Products, US
Design Standard	API 650
Tank Location	Stockton, CA
Product	Gasoline
Specific Gravity	0.74
Manufacturer	Unknown
Manufacture Date	1940
Cathodic Protection	Yes
Data Plate Present	No
Data Plate Condition	N/A

Dimensions:

Diameter (ft.)	60.00
Height (ft.)	30.00
Capacity Gross (bbls.)	15,107.61
Capacity Nominal (bbls.)	15,000

Geometry:

Foundation	Earth Pad with asphalt apron
Bottom	Lap Welded -Double Bottom
Shell	Butt Welded
Roof Type	Fixed Cone Roof
Primary Seal	None
Secondary Seal	None

Access:

Stairway	Spiral Type
Roof Access	Yes

Coatings:

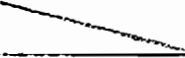
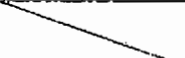
Bottom	None
Shell	External White
Roof	External White

Attachment 4
N-758-5 (Tank 20)
Tank inspection report, 5/22/79

TANK INSPECTION RECORD

PLANT <u>STOCK TDM</u>			TANK NO. <u>2.0</u>		
CODE <u>API STANDARD</u>	CAPACITY <u>11.6 m Bbls.</u>	CONSTRUCTION <u>BUTTWELDED</u>	TYPE ROOF <u>CONE INT. PAN</u>	DIAMETER <u>48'</u>	
HEIGHT <u>40'</u>	MANUFACTURER <u>SOUTHWEST WELDING & MANUFACTURING CO.</u>			DATE ERECTED <u>1949</u>	

MIN. THICKNESS READINGS

DATE	AS BUILT	1ST INSP. <u>5-22-79</u>	2ND INSP.	3RD INSP.	4TH INSP.	RENEWAL THICKNESS
PRODUCT		<u>SS</u>				
EXT/INT		<u>EXT.</u>				
BOTTOM						
RING 1		<u>.262</u>				<u>.238</u>
RING 2		<u>.234</u>				<u>.189</u>
RING 3		<u>.228</u>				<u>.140</u>
RING 4		<u>.208</u>				<u>.10 (MRB)</u>
RING 5		<u>.180</u>				<u>.10 (MRB)</u>
RING 6		<u>.182</u>				<u>.10 (MRB)</u>
RING 7						
INT. PAN		<u>YES</u>				
INT. COATING		<u>NO</u>				
ROOF		<u>.182</u>				<u>.10 (MRB)</u>
PAINT		<u>FAIR</u>				
INSPECTED BY		<u>A. BURICH</u>				

TANK INSPECTION REPORT

DATE: 5-22-79

<input checked="" type="checkbox"/> EXTERNAL	PLANT <u>STOCKTON</u>		TANK NO. <u>20</u>	
<input type="checkbox"/> INTERNAL	ROOF CONE TYPE <u>INT. PAN</u>	PRODUCT <u>SS</u>	SIZE <u>48' X 40'</u>	BY <u>A. BURILIN</u>
CODE/API STAND.		CLEANED BY (CONT'R) <u>NO</u>		
		SANDBLASTED (EXTENT) <u>NO</u>		
ITEM	CONDITION GOOD/*FAIR/*BAD/N/A	ITEM	CONDITION GOOD/*FAIR/*BAD/N/A	
LEAKS	<u>6" INLET & 6" OUTLET VALVES HAVE PACKING LEAKS</u>	LEGS	<u>N/A</u>	
SETTLEMENT	<u>NO</u>	ROOF DRAIN		
FOUNDATION	<u>DIRT & ROCK ON SHELL TO BOTTOM ANGLE</u>	NON-ROTATOR		
DRAINAGE	<u>GOOD</u>	SHOES		
INSULATION	<u>NONE</u>	SEALS		
PAINT	<u>PAINT ON ROOF - SOUTH SIDE SHELL BLISTERS</u>	HANGER ASSEMBLY		
VISUAL CORROSION (EXT)	<u>NO</u>	P/V VENT	<u>24" OPEN VENT ROOF</u>	
BOTTOM ANGLE	<u>NONE</u>	FLAME ARRESTOR	<u>N/A</u>	
RIVETS		MANUAL GAUGE	<u>8" ROOF</u>	
WELDS	<u>BUTTWELDED</u>	AUTOMATIC GAUGE	<u>SHAWD + JURS #192020</u>	
NOZZLES	<u>ALL NOZZLES HAVE REINF. PADS. NO WEEP HOLES</u>	FOAM SYSTEM	<u>NO</u>	
PIPING	<u>GOOD ABOVE GROUND</u>	HIGH LEVEL ALARM	<u>NO</u>	
WATER DRAW VALVES	<u>3" LOCKED</u>	INTERNAL COATING	<u>UNKNOWN</u>	
LADDER/STAIRWAY	<u>SUPPORT BARS EVERY OTHER STEP.</u>	VISUAL CORROSION (INT)	<u>N/A</u>	
PLATFORMS	<u>GOOD</u>	PITTING		
HANDRAILS	<u>GOOD</u>	SUMP		
BUCKLES/BULGES	<u>TOP TIE RINGS ARE BUCKLED INWARDS 20' AREA SOUTH</u>	ROOF STRUCTURAL		
ROOF ANGLE	<u>2" X 2" TURNED OUT</u>	FLOATING SUCTION	<u>YES</u>	
MANWAYS	<u>1-18" ROOF 2-24" SHELL</u>	ROOF DRAIN HOSE/PIPE	<u>N/A</u>	
HATCHES	<u>2-9 1/2" X 22" ROOF</u>	GAUGE WELL		
PONTOONS	<u>N/A</u>	STRIKING PLATE		
ROLLING LADDER		MID POINT THERMOMETER	<u>PALMISTE</u>	
GROUNDS	<u>TANK NOT GROUNDED</u>	HEATING COILS	<u>N/A</u>	

*EXPLAIN REASON FOR FAIR AND BAD CONDITION ON COMMENTS PAGE.

TANK INSPECTION REPORT

EXTERNAL

INTERNAL

PLANT

STOCKTON

TANK NO. 20

COMMENTS, RECOMMENDATIONS & REPAIRS MADE

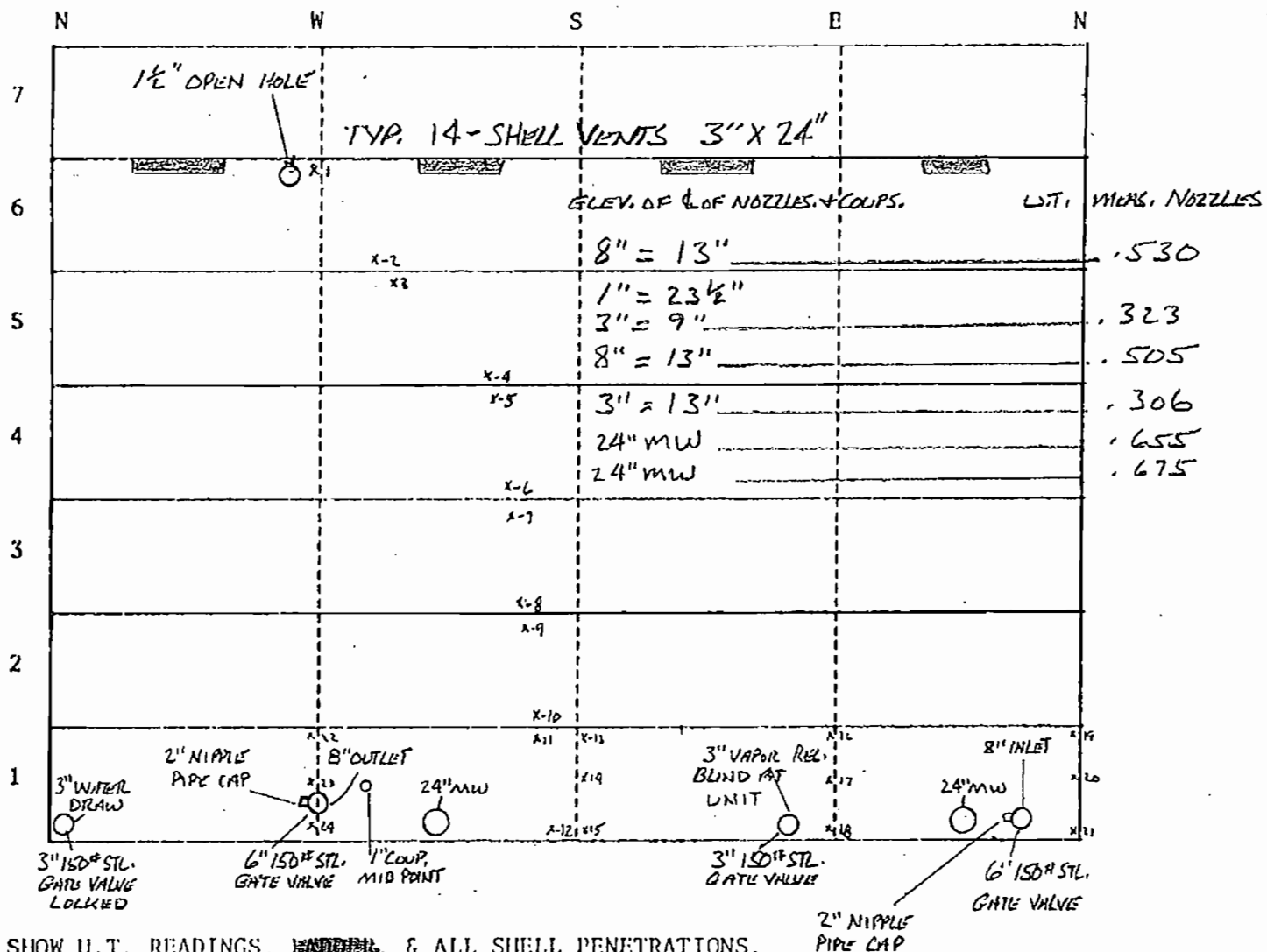
EXTERNAL INSPECTION FOUND TANK TO BE IN GOOD CONDITION. TANK IS NOT GROUNDED AND HAS NO CATHODIC PROTECTION. STAIRWAY HAS SUPPORT RAISE EVERY OTHER STEP. SOUTH SIDE OF SHELL TOP TWO RINGS IS BULKED INWARDS. AREA ABOUT 20' PAINT AND THAT AREA IS PEELLED AWAY DUE FROM FIRE. 3" LINE SOUTH SIDE OF TANK WAS USED FOR VAPOR REC. SYSTEM IT IS BLINDED OFF AT UNIT. TANK DATA NAME PLATE HAS RUST BUILD UP IN BACK OF PLATE. ALL NOZZLES HAVE REINF. PADS NO WEEP HOLES. ROOF PAINT IS FAIR SOME PEELING AND SOME TYPE OF SMALL AREAS OF FUNGUS GROWTH. ROOF AND SHELL VENTS ARE MORE THAN REQUIRED BY API STANDARDS FOR INTERNAL FLOATING ROOFS.

TANK INSPECTION REPORT

<input checked="" type="checkbox"/> EXTERNAL <input type="checkbox"/> INTERNAL	PLANT STOCKTON	TANK NO. 20
---	--	---

U.T. MENS SHELL

- 1-182
- 2-218
- 3-186
- 4-180
- 5-208
- 6-224
- 7-228
- 8-236
- 9-286
- 10-234
- 11-263
- 12-267
- 13-310
- 14-284
- 15-304
- 16-266
- 17-276
- 18-292
- 19-262
- 20-278
- 21-284
- 22-286
- 23-280
- 24-302



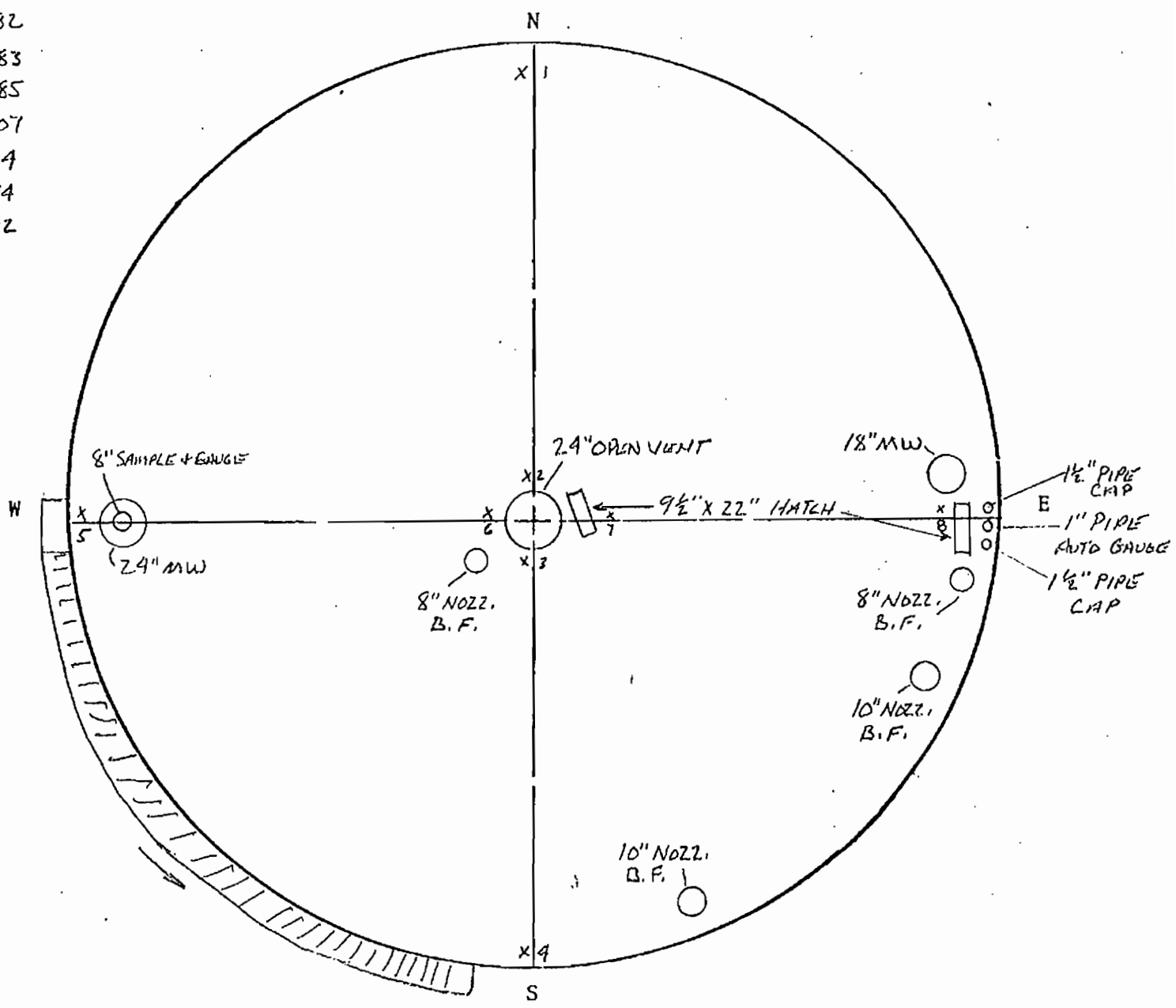
SHOW U.T. READINGS, ~~WATER~~, & ALL SHELL PENETRATIONS.

TANK INSPECTION REPORT

<input checked="" type="checkbox"/> EXTERNAL. <input type="checkbox"/> INTERNAL.	PLANT <i>STOKTON</i>	TANK NO. <i>20</i>
---	----------------------	--------------------

U.T. MEAS. ROOF

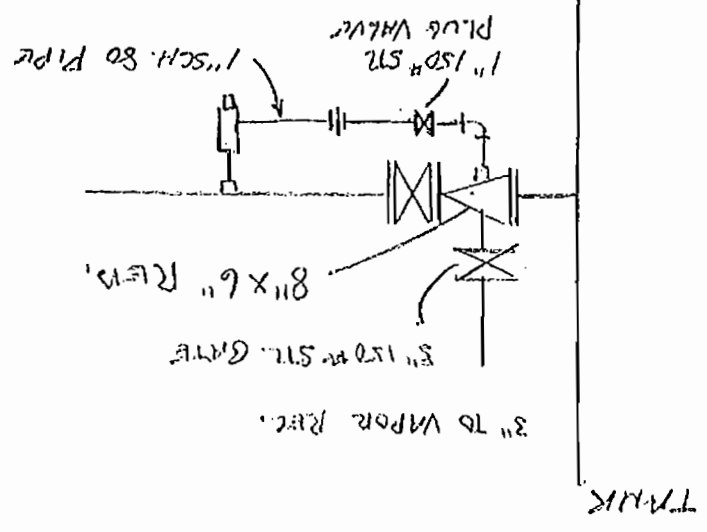
- x-1-190
- x-2-182
- x-3-183
- x-4-185
- x-5-207
- x-6-184
- x-7-194
- x-8-192



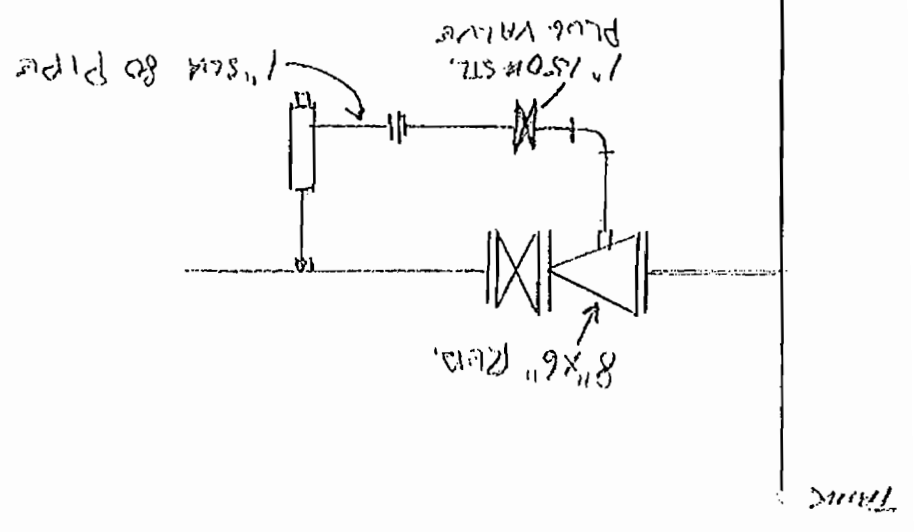
R O O F

RV PIPING
TK-20

8" OUTLET



8" INLET



Attachment 5
N-758-6 (Tank 21)
Tank inspection report, 11/6/78

DATE: 11-16-78

TANK INSPECTION RECORD			STOCKTON				PLANT	
TANK NO.	CAPACITY	CONSTRUCTION	ROOF	DIAMETER	HEIGHT	MANUFACTURER	DATE ERECTED	
21	88LS 29,170	STEEL- WELDED	FR	60'-0"	48'-0"	#B-4205 C.B.I.	1961	
DATE	ORIGINAL	11/78						
PRODUCT		SUR/SURAL						
EXT/INT		BOTH						
BOTTOM		AVG. .260						
RING 1		.259						
RING 2		.260						
RING 3		.260						
RING 4		.302						
RING 5		.326						
RING 6		.396						
RING 7		-						
ROOF		AVG. .215						
INTERNAL COATING		NONE						
PAINT		SEE BELOW						

COMMENTS (INCLUDE RECOMMENDATIONS & REPAIRS MADE):

PAINT: TOP RINGS #1 & #2 SCORCHED IN ADJACENT TANK FIRE; REQUIRE RE-PAINT. REMAINING RINGS FAIR CONDITION, 1.5 TO 6.5 MIL THICK. ROOF PAINT FAIR CONDITION, 6 TO 8 MIL THICK.

INSP. BY JF TRAYN / RP. KANUCGASKE

(FRONT)

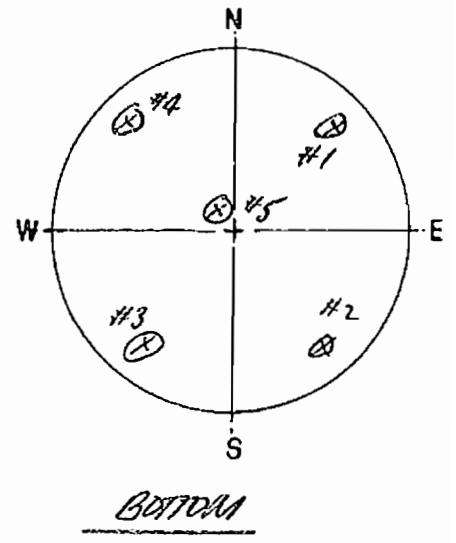
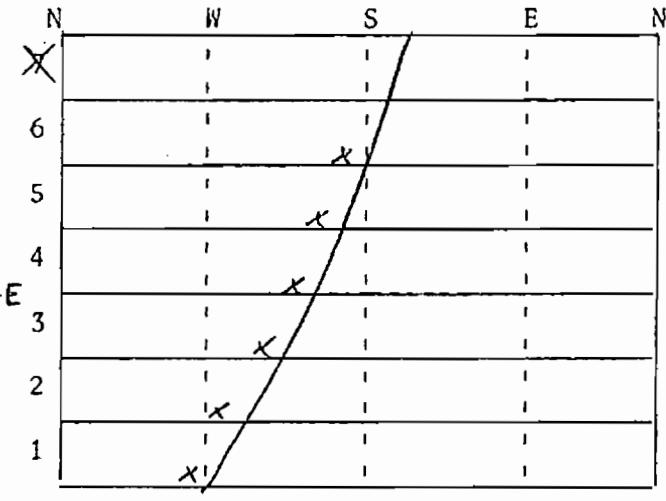
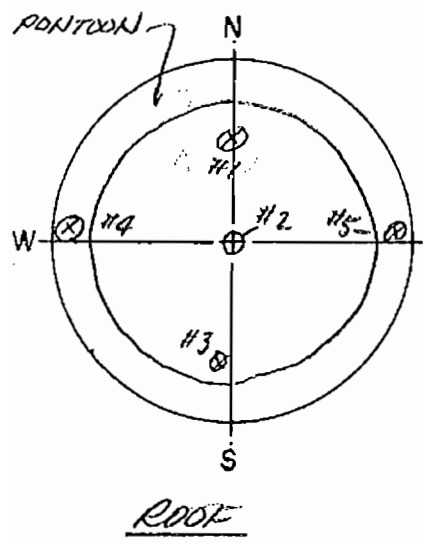
<input checked="" type="checkbox"/> EXTERNAL	TANK INSPECTION REPORT		PLANT <i>STOCKTON</i>	DATE <i>11-16-78</i>
<input checked="" type="checkbox"/> INTERNAL	TANK NO. <i>21</i>	TYPE <i>WELDED FR</i>	PRODUCT <i>J.S.</i>	SIZE <i>60'-0" 18'-0"</i>
CLEANED BY (CONT'R) <i>STOCKTON SERV. STATION EQUIP -</i>			SANDBLASTED (EXTENT) <i>NONE</i>	
ITEM	CONDITION/REMARKS		ITEM	CONDITION/REMARKS
LEAKS	<i>NONE</i>		LEGS	<i>SEE SKETCH - OK</i>
SETTLEMENT	<i>NONE</i>		ROOF DRAIN	<i>3" - OK</i>
FOUNDATION	<i>GOOD</i>		NON-ROTATOR	<i>GAUGE WOULD ACT AS NON-ROTATOR.</i>
DRAINAGE	<i>GOOD</i>		SHOES	<i>FAIR</i>
INSULATION	<i>NONE</i>		SEALS	<i>FAIR</i>
PAINT	<i>TOP RINGS & STAY SCORCHED IN FIRE</i>		HANGER ASSEMBLY	<i>OK</i>
VISUAL CORROSION (EXT)	<i>NONE</i>		P/V VENT	<i>(2) - 12" ROOF VENTS ON MAN</i>
BOTTOM ANGLE	<i>OK</i>		FLAME ARRESTOR	<i>-</i>
RIVETS	<i>-</i>		MANUAL GAUGE	<i>PLATFORM GA WELL - HATCH ON ROOF ALSO</i>
WELDS	<i>OK</i>		AUTOMATIC GAUGE	<i>5 1/2" FIG 2006</i>
NOZZLES	<i>GOOD CONDITION</i>		FOAM SYSTEM	<i>NONE</i>
PIPING	<i>OK</i>		HIGH LEVEL ALARM	<i>NONE</i>
WATER DRAW VALVES	<i>2" - OK</i>		INTERNAL COATING	<i>NONE</i>
LADDER/STAIRWAY	<i>SPIRAL STAY - NEEDS REPAINT</i>		VISUAL CORROSION (INT)	<i>SLIGHT SIDE-WALL PITS - NO SIGNIF. FLOOR PITS</i>
PLATFORMS	<i>OK</i>		PITTING	
HANDRAILS	<i>OK</i>		SUMP	<i>NONE FLAT BOTTOM</i>
BUCKLES/BULGES	<i>NONE</i>		ROOF STRUCTURAL	<i>GOOD</i>
ROOF ANGLE	<i>WIND GIRDER - OK</i>		FLOATING SUCTION	<i>GOOD</i>
MANWAYS	<i>SEE SKETCH</i>		ROOF DRAIN HOSE/PIPE	<i>GOOD</i>
HATCHES	<i>SEE SKETCH</i>		GAUGE WELL	<i>OK</i>
PONTOONS	<i>OK</i>		STRIKING PLATE	<i>NONE</i>
ROLLING LADDER	<i>GOOD</i>		MID POINT THERMOMETER	<i>OK</i>
GROUNDS	<i>OK</i>		HEATING COILS	<i>NONE</i>

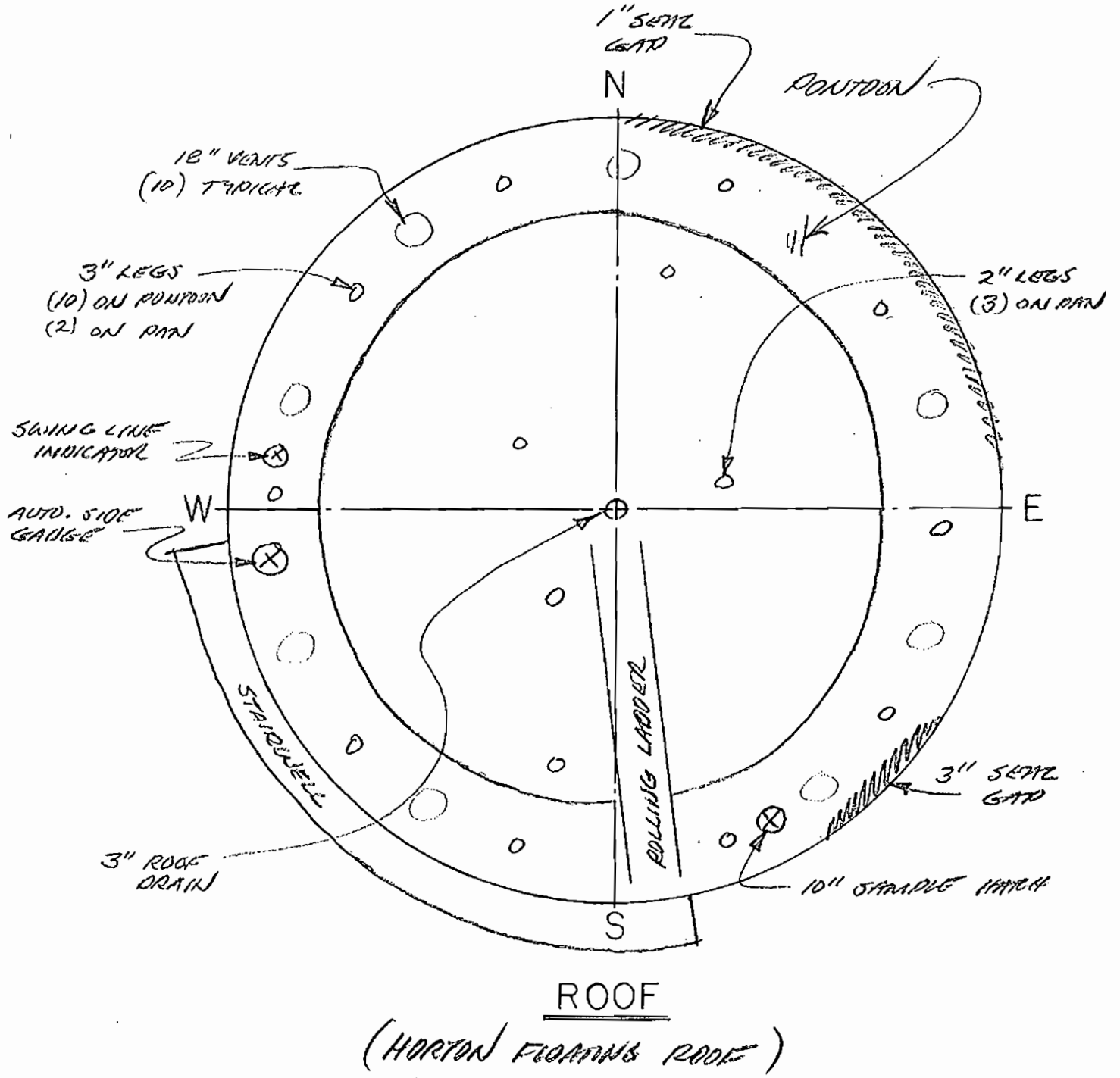
<input checked="" type="checkbox"/> EXTERNAL	PLANT <i>STOCKTON</i>	TANK NO. <i>21</i>
<input checked="" type="checkbox"/> INTERNAL	TANK INSPECTION REPORT	

GENERAL CONDITION & RECOMMENDATIONS -

1. RECENT FIRE IN ADJACENT TANK AND GROUNDS RESULTED IN SCORCHED PAINT ON SPIRAL STAIR & TOP (2) RINGS. OTHERWISE, TANK IN GOOD CONDITION.
2. NO SCALE FORMATION ON INTERNAL BOTTOM AREA - NO APPARENT PITTING. ~~ACTION TAKEN~~ - EXTERNAL BOTTOM CONDITION UNKNOWN -
3. ROOF SEAL: GAP AROUND APPROX 25% CIRCUMFERENCE.

THICKNESS READINGS <i>11/16/78</i>						INSTRUMENT - "801"			
READING #	1	2	3	4	5				COMMENTS
BOTTOM	.272	.259	.248	.252	.280				
RING 1	.259								
RING 2	.260								
RING 3	.260								
RING 4	.302								
RING 5	.326								
RING 6	.396								
RING 7									
ROOF	.215	.254	.217	.221	.210				



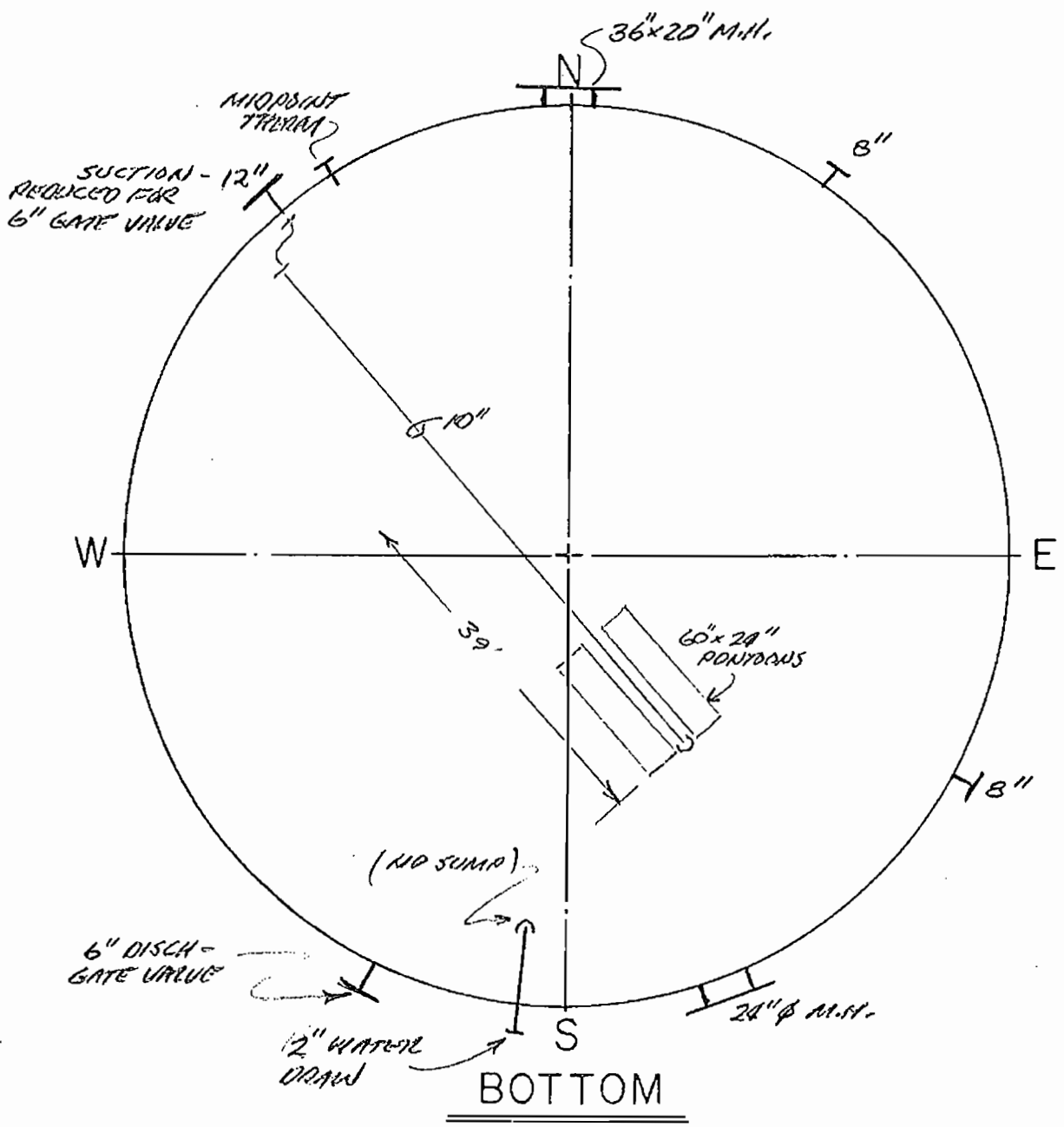


1. OVERALL CONDITION GOOD - NOTE GAPS OF SETBACK AND WATER - ROOF IN HIGH LEG POSITION.

External
Internal Tank Inspection Report

Plant *STOCKTON*

Tank No *21*



Attachment 6

N-758-7 (Tank 17)

API 653 tank inspection report excerpt (see p. 4 for tank construction date)

Above Ground Storage Tank Inspection Report

In accordance with API 653

**Shell Oil Products, US
Tank 17
In Service Inspection Visual Only
Stockton, CA**

March 5, 2010

Report No. 241346B8740 3/3

Prepared By:



3985 Teal Court
Benicia, California 94510
(707) 746-5870



Table of Contents

1.0 Job Information	3
2.0 Tank Inspection Data Sheet	4
3.0 Summarized Recommendations	5
4.0 API 653 Checklist	6
5.0 Inspection Interval Calculations	13
5.1 Period Until Next External Inspection	13
6.0 Drawings	14
6.1 Fixed Roof Detail	14
6.2 Shell Plate Detail	14
7.0 Photographs	15
8.0 Inspector Certifications	23



1.0 Job Information

Job Location	Shell Oil Products, US 3515 Navy Drive Stockton, CA 95206
Customer Representative	Mike Torres
Customer Phone Number	408-592-1405
Job Charge Number	241346B8740
Report Number	241346B8740 3/3
Mistras Job No.	241346B8740
Inspection Personnel Provided	William Ensign API 653 Certified Inspector Certification No. 6115 Tyler Deporto NDE II Technician UTT/MT/PT



2.0 Tank Inspection Data Sheet

General:

Tank Number	17
Owner	Shell Oil Products, US
Design Standard	API 12C
Tank Location	Stockton, CA
Product	Premium Gasoline
Specific Gravity	0.74
Manufacturer	CB&I
Manufacture Date	1940
Cathodic Protection	None
Data Plate Present	NO
Data Plate Condition	N/A

Dimensions:

Diameter (ft.)	48.00
Height (ft.)	30.00
Capacity Gross (bbls.)	96,688,703.68
Capacity Nominal (bbls.)	8900 barrels

Geometry:

Foundation	Earth Pad
Bottom	Butt Welded – Second Floor
Shell	Butt Welded
Roof Type	Fixed Cone Roof
Primary Seal	None
Secondary Seal	None

Access:

Stairway	Radial Staircase
Roof Access	Yes

Coatings:

Bottom	Unknown
Shell	External White
Roof	External White

Attachment 7

N-758-14 (Tank 18)

Tank inspection report, 4/11/78

ANK INSPECTION RECORD STOCKTON PLANT

ANK NO. 18	CAPACITY 20 MB	CONSTRUCTION WELD	ROOF OPEN TOP FLAT	DIAMETER 60'	HEIGHT 40'	MANUFACTURER CBI CONTRACT # 6-3874 CODE (API) 12C	DATE ERECTED 1953
----------------------	--------------------------	-----------------------------	--------------------------------------	------------------------	----------------------	--	-----------------------------

DATE	ORIGINAL						
PRODUCT							
EXT/INT							
BOTTOM	.250						
RING 1							
RING 2							
RING 3							
RING 4							
RING 5							
RING 6							
RING 7							
ROOF	.190						
INTERNAL COATING	NONE						
PAINT 8/14/72							

THICKNESS - AVE./MIN.

COMMENTS
(INCLUDE RECOMMENDATIONS & REPAIRS MADE)

(FRONT)

EXTERNAL INTERNAL TANK INSPECTION REPORT		PLANT <i>Spokane</i>	DATE <i>4/11/78</i>
TANK NO. <i>18</i>	DOUBLE DECK TYPE <i>110' TO 11' FLOOR OPEN TO 12' 20' N. OF IN. MANWAY</i>	PRODUCT <i>H.B. GRSO</i>	SIZE <i>60' d x 40' h.</i> BY <i>A. WILSON</i>
CLEANED BY (CONT'R) <i>ANT PEHL</i>		SANDBLASTED (EXTENT) <i>CON'L SURF 3/15/78</i>	
ITEM	CONDITION/REMARKS	ITEM	CONDITION/REMARKS
LEAKS	<i>20' N. OF W. MANWAY JWEAR AT COR WELDING</i>	LEGS	<i>O.K.</i>
SETTLEMENT	<i>SW TO N.W. SOME (ELEVS NOT TAKEN)</i>	ROOF DRAIN	<i>O.K.</i>
FOUNDATION	<i>O.K.</i>	NON-ROTATOR	<i>O.K.</i>
DRAINAGE	<i>O.K.</i>	SHOES	<i>O.K.</i>
INSULATION	<i>NONE</i>	SEALS <i>GOOD FOR LENGTH OF SERV.</i>	<i>RUBBER COATED CRACKED & DETERIORATE</i>
PAINT	<i>VERY GOOD.</i>	HANGER ASSEMBLY	<i>O.K.</i>
VISUAL CORROSION (EXT)	<i>NONE OR VERY LITTLE</i>	P/V VENT	<i>O.K.</i>
BOT 1 ANGLE	<i>VERY GOOD.</i>	FLAME ARRESTOR	
RIVETS	<i>N/A.</i>	MANUAL GAUGE	<i>O.K.</i>
WELDS	<i>O.K.</i>	AUTOMATIC GAUGE	<i>NEED REPLACEMENT</i>
NOZZLES	<i>O.K.</i>	FOAM SYSTEM	<i>NONE.</i>
PIPING	<i>O.K.</i>	HIGH LEVEL ALARM	<i>NONE.</i>
WATER DRAW VALVES	<i>O.K.</i>	INTERNAL COATING	<i>NONE.</i>
LADDER/STAIRWAY	<i>VERY GOOD.</i>	VISUAL CORROSION (INT) <i>Bottom</i>	<i>PITTING MODERATE TO SEVERE 1/16 - 1/8 +</i>
PLATFORMS	<i>✓ ✓</i>	PITTING	<i>SEE ABOVE SHELL Re O.K.</i>
HANDRAILS	<i>✓ ✓</i>	SUMP	<i>O.K.</i>
BUCKLES/BULGES	<i>NONE NOTICED.</i>	ROOF STRUCTURAL	<i>NONE.</i>
ROOF ANGLE	<i>WIND GULLER O.K.</i>	FLOATING SUCTION	<i>REMOVE W/ING IT OPERATOR (CABLE BROKE).</i>
MANWAYS	<i>O.K.</i>	ROOF DRAIN HOSE/PIPE	<i>O.K.</i>
HATCHES	<i>O.K.</i>	GAUGE WELL	<i>O.K.</i>
PONTOONS	<i>O.K.</i>	STRIKING PLATE	<i>NONE.</i>
ROLLING LADDER	<i>O.K.</i>	MID POINT THERMOMETER	<i>NEEDS REPLACEMENT</i>
GROUNDS	<i>NONE</i>	HEATING COILS	<i>NONE</i>

EXTERNAL
INTERNAL TANK INSPECTION REPORT

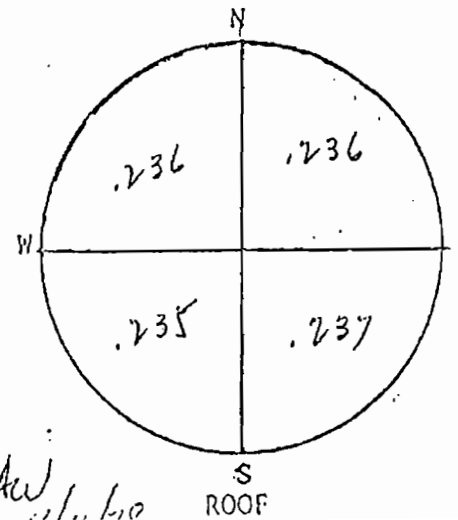
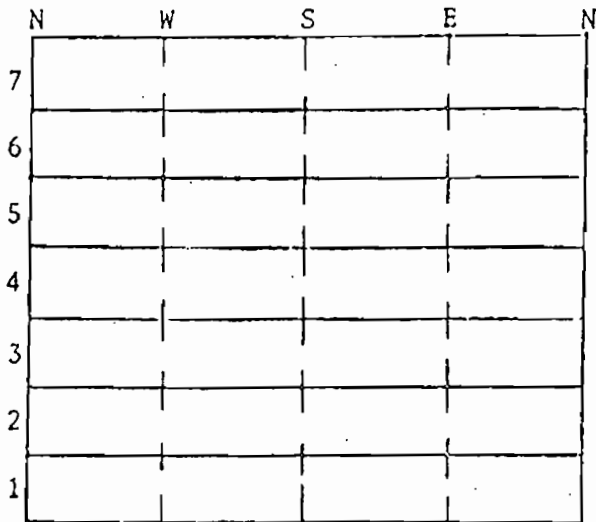
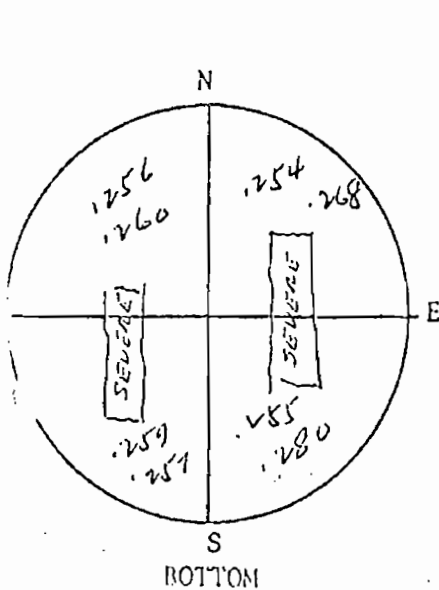
PLANT *STOCKTON*

TANK NO. *18*

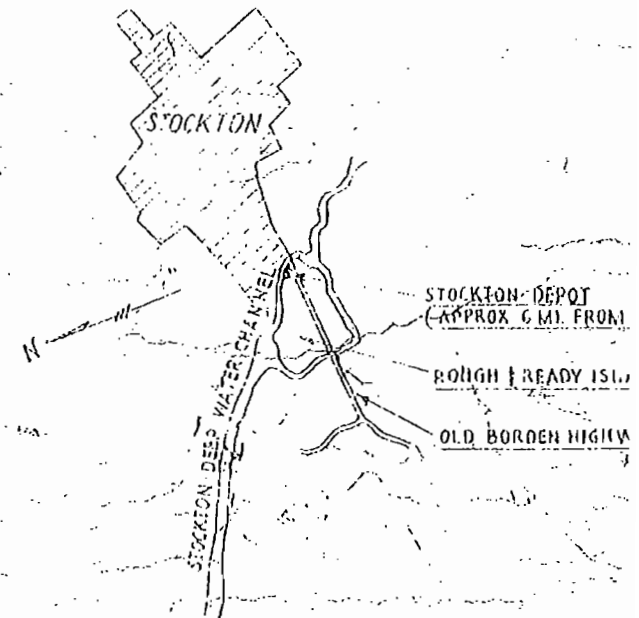
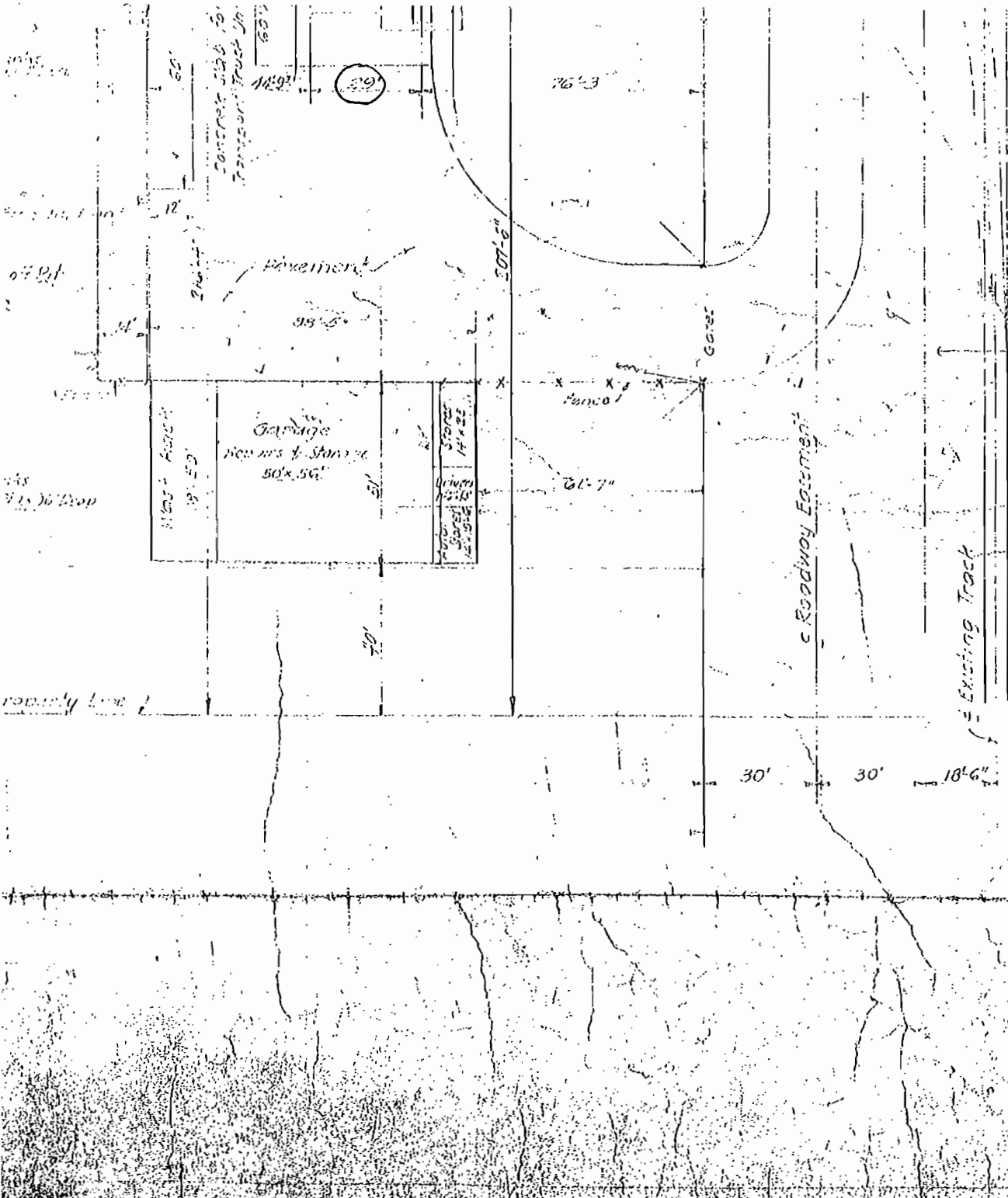
GENERAL CONDITION & RECOMMENDATIONS -

ACTION TAKEN -

THICKNESS READINGS									INSTRUMENT -
READING #	1	2	3	4	5	6	7	8	COMMENTS
BOTTOM	.254	.268	.255	.280	.259	.257	.256	.260	SEVERE LOCALIZED PIPPING 1/16" TO 1/8" DEEP ±
RING 1	.385	.389							
RING 2	.302	.304							
RING 3	.289	.289							
RING 4	.298	.295							
RING 5	.290	.292							
RING 6									
RING 7									
ROOF	.236	.237	.235	.236					



AW 1.1.10



LOCATION PLAN

MARK	DATE	DESC
Δ	1-22-53	Added 20,000 lb
Δ	5-1-40	HOSE RACKS at 2' PER
Δ	3-11-40	FULL STAND & PAVING
Δ	3-8-40	DECK CASING (L&S)
Δ	2-26-40	INCREASED LENGTH

LIST OF CHANGES

SHELL OIL
INCORPORATED

ENGINEERING DEPT.

LAYOU

STOCKTON,
CALIFORNIA

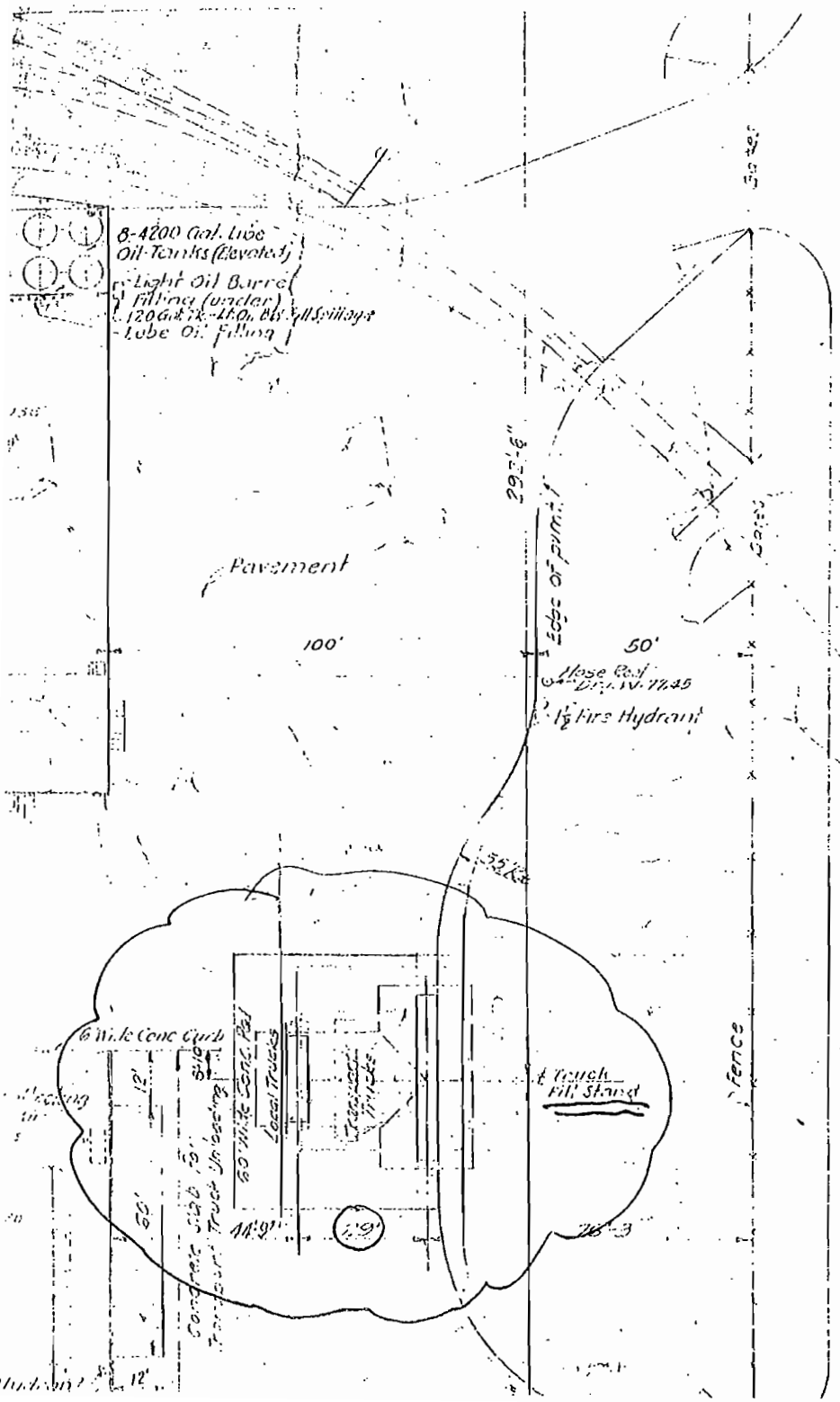
SCALE 1" = 30'

DATE 12-13-39

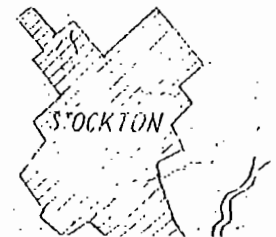
DRAWN BY H. J. D. TRIP BY

CHECKED BY

Handwritten notes:
1867
REV. 12-13-39

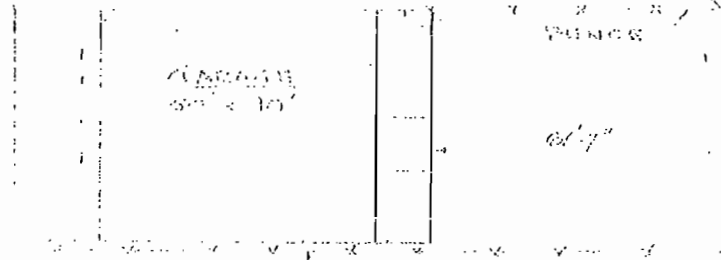


- Y-12178 Piping Details - Wharf to
- Y-12179 Details Warehouse Bui.
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11



CONCRETE

6'-7"

11'-0"

PLAN



LOCKPORT PLAN

STOCKTON, CALIF.

STOCKTON, CALIF.

STOCKTON, CALIF.

DATE	REVISION



SHELL OIL
HOUSTON,

PLOT P
STOCKTON, D
STOCKTON, C

SCALE	DATE	CHKD / APP'D
	7-15-73	
DWN BY		
CHKD BY		

10-7

