



JAN 15 2014

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

RE: Notice of Final Action - Authority to Construct
Facility Number: N-758
Project Number: N-1123247

Dear Ms. Geijer:

The Air Pollution Control Officer has issued the Authority to Construct permits to Equilon Enterprises, LLC for a proposal to increase throughput for storage and loading equipment at a gasoline bulk terminal, at 3515 Navy Drive, Stockton, California. Enclosed is a copy of the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the Authority to Construct permits was published on December 2, 2013. The District's analysis of the proposal was also sent to CARB and US EPA Region IX on November 22, 2013. All comments received following the District's preliminary decision on this project were considered. The District response to each of these comments is attached.

Comments received by the District during the public notice period resulted in minor changes to the proposed permits including correcting typographical errors and clarification to the permit requirement defining "leak-free" condition. These changes were minor and did not trigger additional public notification requirements, nor did they have any impact upon the Best Available Control Technology determination or on the amount of offsets required for project approval.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

Ms. Theresa Geijer
Page 2

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

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Warner', with a long horizontal flourish extending to the right.

David Warner
Director of Permit Services

DW: JK

Enclosures

cc: Mike Tollstrup, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

Response to the Comments from the Applicant

Comment #1:

Correct typographical errors

- N-758-14-4: Replacing “secondary wipe seal” with “secondary wiper seal” in the equipment description.
- N-758-16-0: Correct condition #34 that states, “...in no case shall not exceed 1/2 inch” to “...in no case shall exceed 1/2 inch”
- N-758-16-0: Correct condition #36 that states, “...in no case shall not exceed 1/8 inch” to “...in no case shall exceed 1/8 inch”

Response:

All of the above typographical errors have been corrected in the permits.

Comment #2:

The applicant states that the post-project equipment description for N-758-14-4 should say “...external floating roof gasoline/denatured ethanol/diesel storage tank...”

Response:

The District notes that the equipment description will be revised to say “...external floating roof gasoline/denatured ethanol/diesel storage tank...” in Permit to Operate N-758-14-4.

Comment #3:

Clarification to permit requirement defining “leak-free” condition in permits N-758-4-5 (condition #25), N-758-14-4 (condition #26), and N-758-16-0 (condition #25)

The “leak-free” condition is defined as follows:

“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]”

The applicant states that the way this condition reads, a gas or liquid leak is considered an automatic violation. But Rule 4623 provides a repair period for leaks when the tank is part of the Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program. Shell believes the condition should be reworded to allow for a repair period when the tank is part of the program. Suggested language is as follows:

“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, unless the operator participates in the Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program, and the operator follows the required inspection, maintenance, and repair provisions outlined in Tables 3, 4, and 5 of Rule 4623 for this tank."

Response:

After reviewing Rule 4623, the condition has been revised as follows:

N-758-4-5, '-16-0

"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, unless this tank is a part of Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program under section 5.7 of Rule 4623 and complies with all requirements in Table 5 of Rule 4623 for Internal Floating Roof Tank Preventative Inspection and Maintenance. [District Rule 4623]"

N-758-14-0

"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, unless this tank is a part of Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program under section 5.7 of Rule 4623 and complies with all requirements in Table 4 of Rule 4623 for External Floating Roof Tank Preventative Inspection and Maintenance. [District Rule 4623]"

Response to the Comments from CARB and EPA

No comments received from CARB and EPA on this project.



AUTHORITY TO CONSTRUCT

PERMIT NO: N-758-4-5

ISSUANCE DATE: 01/08/2014

LEGAL OWNER OR OPERATOR: EQUILON ENTERPRISES LLC
MAILING ADDRESS: SHELL OIL PRODUCTS US ATTN: ENV COORD
2555 13TH AVENUE SW
SEATTLE, WA 98134

LOCATION: ROUGH & READY ISLAND
STOCKTON, CA 95203

EQUIPMENT DESCRIPTION:
MODIFICATION OF 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: TO INCREASE MONTHLY THROUGHPUT RATE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. VOC emissions from this tank shall not exceed 11.4 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. VOC emissions from this tank shall not exceed 2,699 pounds in any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadredin, Executive Director / APCD

DAVID WARNER, Director of Permit Services

N-758-4-5 Jan 8 2014 7:58 AM - KAHLOUJ Joint Inspection NOT Required

5. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit. These records shall contain each process variable used (e.g., throughput, RVP, etc.) in estimating VOC emissions from this tank and actual process variables (e.g. throughput, RVP, etc.) of this tank. The process variables used in estimating the emissions shall be compared to that of the actual process variables to demonstrate compliance with each emission limit. The permittee may also use EPA's Tanks program (or other District accepted methodologies) with actual process variables to demonstrate compliance with each emission limit. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fugitive VOC from valves, flanges, connector, pump seals etc., associated with this tank shall not exceed any of the following limits: 0.2 lb/day and 69 lb/year. [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. Throughput of organic liquid for this tank shall not exceed any of the following limits: 504,000 gallons/day and 7,560,000 gallons/month. [District Rule 2201] Federally Enforceable Through Title V Permit
9. True vapor pressure (TVP) of the liquid stored in this tank shall be less than 11 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The owner or operator shall determine RVP and the temperature of the organic liquid stored on monthly basis. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. 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
12. No gap between the tank shell and the primary seal shall exceed 1-1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
13. 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
14. 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
15. 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
16. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
17. 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
18. 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
19. 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
20. 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

CONDITIONS CONTINUE ON NEXT PAGE

21. 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
22. 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
23. All openings in the roof used for sampling and gauging, except pressure-vacuum 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
24. The tank shall be operated in a leak-free condition. The pressure-vacuum 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
25. 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, unless this tank is a part of Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program under section 5.7 of Rule 4623 and complies with all requirements in Table 5 of Rule 4623 for Internal Floating Roof Tank Preventative Inspection and Maintenance. [District Rule 4623] Federally Enforceable Through Title V Permit
26. 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
27. 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
28. 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
29. 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
30. 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
31. 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
32. 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
33. 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

CONDITIONS CONTINUE ON NEXT PAGE

34. 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
35. 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
36. 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 rule 4623. [District Rule 4623; 40 CFR 60.113b(a)(2) and 63.11092(e)(1)] Federally Enforceable Through Title V Permit
37. 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
38. 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
39. 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
40. 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
41. 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
42. 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

CONDITIONS CONTINUE ON NEXT PAGE

43. 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
44. 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
45. The permittee shall maintain records of daily and monthly organic liquid throughput in gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
46. 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 Rules 2201 and 4623, and 40 CFR 60.116b(a)] Federally Enforceable Through Title V Permit
47. Prior to operating under this Authority to Construct, the permittee shall mitigate the following quantities of VOC: 1st quarter: 76 lb, 2nd quarter: 76 lb, 3rd quarter: 76 lb, and 4th quarter: 76 lb. Offsets shall be provided at the applicable offset ratio specified in Section 4.8.1 of Rule 2201 (as amended 4/21/11) [District Rule 2201] Federally Enforceable Through Title V Permit
48. VOC ERC S-3809-1 and N-1000-1 (or a certificate split from any of these certificates) shall be used to supply the required VOC offsets, unless a revised offsetting proposal is received and approved by the District. Following the revisions, this Authority to Construct permit shall be re-issued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to re-issuance of this Authority to Construct permit. [District Rule 2201] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: N-758-13-9

ISSUANCE DATE: 01/08/2014

LEGAL OWNER OR OPERATOR: EQUILON ENTERPRISES LLC
MAILING ADDRESS: SHELL OIL PRODUCTS US ATTN: ENV COORD
2555 13TH AVENUE SW
SEATTLE, WA 98134

LOCATION: ROUGH & READY ISLAND
STOCKTON, CA 95203

EQUIPMENT DESCRIPTION:
MODIFICATION OF 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: TO INCREASE ANNUAL THROUGHPUT RATE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE, Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N:758-13-9 1/8/2014 7:52AM - KAHLOUJ - Joint Inspection NOT Required

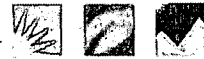
6. The John Zink vapor processing unit shall have two operational carbon adsorption columns. Each column shall be regenerated every 15 minutes when the device is in operation. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The vapors from the facility's fixed roof tanks and loading 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
8. Fugitive VOC emissions from this unit shall not exceed 9,362 lb-VOC/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. 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
12. 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 196,000,000 gallons of gasoline throughput in a 12 consecutive month rolling period. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit
13. All trucks shall be bottom loaded (or submerge loaded) using dry break couplers. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
14. VOC control efficiency of the carbon adsorber system shall be at least 99% on weight basis [District Rules 2201 and 4102]
15. 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
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
20. 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
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)] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
34. 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
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] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

37. The permittee shall maintain records of the daily, monthly, 12-month total 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
38. Prior to operating under this Authority to Construct, the permittee shall mitigate the following quantities of VOC: 1st quarter: 1,445 lb, 2nd quarter: 1,445 lb, 3rd quarter: 1,445 lb, and 4th quarter: 1,446 lb. Offsets shall be provided at the applicable offset ratio specified in Section 4.8.1 of Rule 2201 (as amended 4/21/11) [District Rule 2201] Federally Enforceable Through Title V Permit
39. VOC ERC S-3809-1 and N-1000-1 (or a certificate split from any of these certificates) shall be used to supply the required VOC offsets, unless a revised offsetting proposal is received and approved by the District. Following the revisions, this Authority to Construct permit shall be re-issued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to re-issuance of this Authority to Construct permit. [District Rule 2201] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: N-758-14-4

ISSUANCE DATE: 01/08/2014

LEGAL OWNER OR OPERATOR: EQUILON ENTERPRISES LLC
MAILING ADDRESS: SHELL OIL PRODUCTS US ATTN: ENV COORD
2555 13TH AVENUE SW
SEATTLE, WA 98134

LOCATION: ROUGH & READY ISLAND
STOCKTON, CA 95203

EQUIPMENT DESCRIPTION:

MODIFICATION OF 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 WIPER SEAL. ALLOW STORAGE OF DIESEL AND DENATURED ETHANOL IN ADDITION TO GASOLINE STORAGE

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. VOC emissions from this tank shall not exceed 28.9 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. VOC emissions from this tank shall not exceed 6,707 pounds in any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances, and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services
N-758-14-4 Jan 8 2014 1:02 PM - KAHLONU Joint Inspection NOT Required

5. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit. These records shall contain each process variable used (e.g., throughput, RVP, etc.) in estimating VOC emissions from this tank and actual process variables (e.g. throughput, RVP, etc.) of this tank. The process variables used in estimating the emissions shall be compared to that of the actual process variables to demonstrate compliance with each emission limit. The permittee may also use EPA's Tanks program (or other District accepted methodologies) with actual process variables to demonstrate compliance with each emission limit. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fugitive VOC from valves, flanges, connector, pump seals etc., associated with this tank shall not exceed any of the following limits: 0.2 lb/day and 55 lb/year. [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. Throughput of organic liquid for this tank shall not exceed any of the following limits: 698,136 gallons/day, 20,961,220 gallons/month and 50,952,827 gallons/year based on a 12-month rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
9. True vapor pressure (TVP) of the liquid stored in this tank shall be less than 11 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The owner or operator shall determine RVP and the temperature of the organic liquid (except diesel) stored on monthly basis. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. 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
14. 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
15. 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
16. 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
17. 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
18. Accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm² per meter (1.0 inch² 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
19. 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

CONDITIONS CONTINUE ON NEXT PAGE

20. 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
21. 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
22. 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
23. 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
24. All openings in the roof used for sampling and gauging, except pressure-vacuum 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
25. The tank shall be in a leak-free condition. The pressure-vacuum 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
26. 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, unless this tank is a part of Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program under section 5.7 of Rule 4623 and complies with all requirements in Table 4 of Rule 4623 for External Floating Roof Tank Preventative Inspection and Maintenance. [District Rule 4623] Federally Enforceable Through Title V Permit
27. 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
28. 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
29. 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
30. 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
31. 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
32. 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

CONDITIONS CONTINUE ON NEXT PAGE

33. 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
34. 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
35. 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
36. The slotted guidepole well on an 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
37. 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
38. 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
39. 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
40. 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
41. 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
42. 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
43. 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)] Federally Enforceable Through Title V Permit
44. 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

CONDITIONS CONTINUE ON NEXT PAGE

45. 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(e)] Federally Enforceable Through Title V Permit
46. 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
47. 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
48. 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
49. 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
50. 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
51. 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(e)] Federally Enforceable Through Title V Permit
52. 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 Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
53. The 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
54. 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
55. The permittee shall maintain records of daily, monthly and annual (12-month rolling total) organic liquid throughput in gallons. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

56. 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



AUTHORITY TO CONSTRUCT

PERMIT NO: N-758-16-0

ISSUANCE DATE: 01/08/2014

LEGAL OWNER OR OPERATOR: EQUILON ENTERPRISES LLC
MAILING ADDRESS: SHELL OIL PRODUCTS US ATTN: ENV COORD
2555 13TH AVENUE SW
SEATTLE, WA 98134

LOCATION: ROUGH & READY ISLAND
STOCKTON, CA 95203

EQUIPMENT DESCRIPTION:
ONE 2,226,000 GALLON (53,000 BBL) WELDED INTERNAL FLOATING ROOF GASOLINE/DENATURED ETHANOL/DIESEL STORAGE TANK (TANK #24) WITH A MECHANICAL SHOE PRIMARY SEAL AND A SECONDARY RIM-MOUNTED WIPER SEAL

CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. VOC emissions from this tank shall not exceed 10.6 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. VOC emissions from this tank shall not exceed 1,736 pounds in any 12 consecutive month rolling period. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadeghin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-758-16-0 Jan 8 2014 7:52AM - KAHLOUJ Joint Inspection NOT Required

5. The permittee shall maintain records sufficient to demonstrate compliance with each emission limit. These records shall contain each process variable used (e.g., throughput, RVP, etc.) in estimating VOC emissions from this tank and actual process variables (e.g. throughput, RVP, etc.) of this tank. The process variables used in estimating the emissions shall be compared to that of the actual process variables to demonstrate compliance with each emission limit. The permittee may also use EPA's Tanks program (or other District accepted methodologies) with actual process variables to demonstrate compliance with each emission limit. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Fugitive VOC from valves, flanges, connector, pump seals etc., associated with this tank shall not exceed any of the following limits: 0.2 lb/day and 68 lb/year. [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. Throughput of organic liquid for this tank shall not exceed any of the following limits: 2,256,917 gallons/day and 13,566,845 gallons/month. [District Rule 2201] Federally Enforceable Through Title V Permit
9. True vapor pressure (TVP) of the liquid stored in this tank shall be less than 11 psia. [District Rule 4623] Federally Enforceable Through Title V Permit
10. The owner or operator shall determine RVP and the temperature of the organic liquid stored on monthly basis. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit
11. 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
12. No gap between the tank shell and the primary seal shall exceed 1-1/2 inches. [District Rule 4623] Federally Enforceable Through Title V Permit
13. 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
14. 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
15. 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
16. No gap between the tank shell and the secondary seal shall exceed 1/2 inch. [District Rule 4623] Federally Enforceable Through Title V Permit
17. 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
18. 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
19. 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
20. 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

CONDITIONS CONTINUE ON NEXT PAGE

21. 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
22. 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
23. All openings in the roof used for sampling and gauging, except pressure-vacuum 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
24. The tank shall be operated in a leak-free condition. The pressure-vacuum 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
25. 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, unless this tank is a part of Voluntary Tank Preventive Inspection and Maintenance, and Tank Interior Cleaning Program under section 5.7 of Rule 4623 and complies with all requirements in Table 5 of Rule 4623 for Internal Floating Roof Tank Preventative Inspection and Maintenance. [District Rule 4623] Federally Enforceable Through Title V Permit
26. 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
27. 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
28. 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
29. 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
30. 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
31. 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
32. 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
33. For solid guidepole, 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

CONDITIONS CONTINUE ON NEXT PAGE

34. For solid guidepole, the gap between the pole wiper and the 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
35. For slotted guidepole, 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
36. For slotted guidepole, gap between the pole wiper and the 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
37. 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
38. 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 rule 4623. [District Rule 4623; 40 CFR 60.113b(a)(2) and 63.11092(e)(1)] Federally Enforceable Through Title V Permit
39. 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
40. If any failure (i.e. visible organic liquid on the internal floating roof, tank walls or anywhere, holes or tears in the seal fabric) is detected during 12 month visual inspection, the permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If the detected failure cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the APCO in the inspection report. Such a request must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 60.113b(a)(2) and 63.11092(e)(1)] Federally Enforceable Through Title V Permit
41. 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
42. 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
43. 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

CONDITIONS CONTINUE ON NEXT PAGE

44. 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
45. 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
46. 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
47. The permittee shall maintain records of daily and monthly organic liquid throughput in gallons. [District Rule 2201] 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 Rules 2201 and 4623, and 40 CFR 60.116b(a)] Federally Enforceable Through Title V Permit
49. Prior to operating under this Authority to Construct, the permittee shall mitigate the following quantities of VOC: 1st quarter: 451 lb, 2nd quarter: 451 lb, 3rd quarter: 451 lb, and 4th quarter: 451 lb. Offsets shall be provided at the applicable offset ratio specified in Section 4.8.1 of Rule 2201 (as amended 4/21/11) [District Rule 2201] Federally Enforceable Through Title V Permit
50. VOC ERC S-3809-1 and N-1000-1 (or a certificate split from any of these certificates) shall be used to supply the required VOC offsets, unless a revised offsetting proposal is received and approved by the District. Following the revisions, this Authority to Construct permit shall be re-issued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to re-issuance of this Authority to Construct permit. [District Rule 2201] Federally Enforceable Through Title V Permit