



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

FEB 12 2014

Corey Busby
Crimson Renewable Energy, LP
950 17th Street, Suite 2650
Denver, CO 80202

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: S-6971
Project Number: S-1134522

Dear Mr. Busby:

Enclosed for your review and comment is the District's analysis of Crimson Renewable Energy, LP's application for an Authority to Construct for modifications to a biodiesel production operation, at 17731 Millux Rd, Bakersfield. The project resulted in an increase of 14,729 lb/yr VOC emissions.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice period, the District intends to issue the Authority to Construct. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Richard Edgehill of Permit Services at (661) 392- 5617.

Sincerely,

David Warner
Director of Permit Services

DW:RUE/st

Enclosures

cc: Mike Tollstrup, CARB (w/ enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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Bakersfield, CA 93308-9725
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Which Construction, Reconstruction, or Modification
Commenced After July 23, 1984

- Subpart VVa Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry
- Subpart NNN Standards of Performance for VOC Emissions from SOCM Distillation Operations
- Subpart RRR Standards of Performance for VOC Emissions from the SOCM Reactor Processes

Rule 4101 Visible Emissions (2/17/05)

Rule 4102 Nuisance (12/17/92)

Rule 4455 Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants (4/20/05)

Rule 4623 Storage of Organic Liquids (5/19/05)

CH&SC 41700 Health Risk Assessment

CH&SC 42301.6 School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)

CCR, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The existing biodiesel production facility is located at 17731 Millux Road in Bakersfield, California (Section 2, Township 32S, Range 26E). The facility is not within 1,000 feet of a K-12 school.

IV. Process Description

S-6971-1 (methanol storage and unloading operation)

S-6971-1 includes a 142,800 gallon methanol storage tank and truck/railcar unloading operation served by a gas blanketing/vapor control (GBVC) system with 10,000 gallon vapor surge vessel (VRT-110). Collected vapors from sodium methylate tanks and unloading operations S-6971-5 and -8 are connected to this system. Vapors from S-6971 are sent to facility S-1388 for disposal in incinerator S-1385-42.

S-6971-11 (Batch Biodiesel Production Facility)

The proposed biodiesel production facility will be a batch process operation, and is designed to produce up to 30 million gallons of biodiesel per year. Tanks are served by a nitrogen gas blanketing system connected to the common vapor collection header listed on S-6971-1.

An I&M program for fugitive emissions components reflecting the requirements of 40 CFR Subpart VVa has been implemented. Additionally, fugitive emissions were calculated using

SOCMI Average Emissions Factors with Leak Detection and Repair (LDAR) control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for Hazardous Organics NESHAPS (HON) which are higher than the LDAR control efficiencies based monthly monitoring with a leak definition of 10,000 ppmv (Table 5-2 EPA-453/R-95-017). Therefore facility complies with leak standards of 100 ppmv valves and connectors and 500 ppmv for pumps and compressors to reflect the more stringent control.

Process piping handling liquids having a VOC content greater than 10% and gas/vapor streams having a VOC content greater than 1% by weight are also subject to the I&M control requirements of District Rule 4455.

Proposed Modifications

Six existing process vessels, currently included in S-6971-11 and connected to vapor control system S-6971-1, are given separate permits. Emissions from the tanks are calculated using assuming SOCMI Average Emissions Factors with Leak Detection and Repair (LDAR) control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for Hazardous Organics NESHAPS (HON) which are higher than the LDAR control efficiencies based monthly monitoring with a leak definition of 10,000 ppmv (Table 5-2 EPA-453/R-95-017). Therefore, leak standards of 100 ppmv valves and connectors will also be applicable to tank fugitive emissions components.

V. Equipment Listing

Pre-Project Equipment Description:

S-6971-1-3: 142,800 GALLON FIXED ROOF METHANOL STORAGE TANK AND ACCOMPANYING UNLOADING OPERATION SERVED BY A GAS BLANKET/VAPOR CONTROL SYSTEM DISCHARGING TO VAPOR SURGE VESSEL (V-300) AND VAPOR INCINERATOR LISTED ON S-1385-42

S-6971-11-0: BIODIESEL PRODUCTION OPERATION INCLUDING HFFA PRETREATMENT, TRANSESTERIFICATION, WASH WATER AND REMOVAL, GLYCERIN RECOVERY, AND METHANOL RECOVERY SKIDS, NITROGEN BLANKET/VAPOR CONTROL SYSTEM VENTED TO S-6971-1 VAPOR CONTROL SYSTEM

Proposed Modification:

S-6971-1-4: MODIFICATION OF 142,500 GALLON FIXED ROOF METHANOL STORAGE TANK AND ACCOMPANYING UNLOADING OPERATION, SERVED BY A SHARED GAS BLANKETING/VAPOR CONTROL SYSTEM SHARED WITH S-6971-5 AND -8 DISCHARGING TO VAPOR SURGE VESSEL (VRT-110) AND VAPOR INCINERATOR LISTED ON S-1385-42: IDENTIFY PERMITS S-6971-16 THROUGH -21 AS SERVED BY THE VAPOR CONTROL SYSTEM

S-6971-11-1: MODIFICATION OF BIODIESEL PRODUCTION OPERATION INCLUDING HFFA PRETREATMENT, TRANSESTERIFICATION, WASH WATER AND REMOVAL, GLYCERIN RECOVERY, AND METHANOL RECOVERY SKIDS, NITROGEN BLANKET/VAPOR CONTROL SYSTEM VENTED TO S-6971-1 VAPOR CONTROL SYSTEM: REMOVE SIX PROCESS VESSELS FROM EQUIPMENT DESCRIPTION AND PERMIT AS SEPARATE PERMIT UNITS, CORRECT COMPONENTS COUNTS

Post Project Equipment Description:

- S-6971-1-4: 142,800 GALLON FIXED ROOF METHANOL STORAGE TANK AND ACCOMPANYING UNLOADING OPERATION SERVED BY A GAS BLANKET/VAPOR CONTROL SYSTEM DISCHARGING TO VAPOR SURGE VESSEL (V-300) AND VAPOR INCINERATOR LISTED ON S-1385-42
- S-6971-11-1: BIODIESEL PRODUCTION OPERATION INCLUDING HFFA PRETREATMENT, TRANSESTERIFICATION, WASH WATER AND REMOVAL, GLYCERIN RECOVERY, AND METHANOL RECOVERY SKIDS, NITROGEN BLANKET/VAPOR CONTROL SYSTEM VENTED TO S-6971-1 VAPOR CONTROL SYSTEM
- S-6971-16-0: 142,800 GALLON BIODIESEL SETTLING TANK W/TVR SHARED WITH PERMIT -1 (PF-4)
- S-6971-17-0: 4,000 GALLON GLYCERIN SETTLING TANK W/ TVR SHARED WITH PERMIT -1 (V-560)
- S-6971-18-0: 2,500 GALLON OIL SEPARATION TANK W/ TVR SHARED WITH PERMIT -1 (V-401)
- S-6971-19-0: 15,000 GALLON POST TE SURGE TANK W/ TVR SHARED WITH PERMIT -1 (V-360)
- S-6971-20-0: 6,000 GALLON NEUTRALIZATION TANK W/ TVR SHARED WITH PERMIT -1 (V-460)
- S-6971-21-0: 6,000 GALLON NEUTRALIZATION TANK W/ TVR SHARED WITH PERMIT -1 (V-470)

VI. Emission Control Technology Evaluation

VOC emissions are controlled with a stringent I&M Program for fugitive emissions components.

Note that fugitive emissions of VOCs are based on Leak Detection and Repair (LDAR) control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for Hazardous Organics NESHAPS (HON) which are higher than the LDAR control efficiencies based monthly monitoring with a

leak definition of 10,000 ppmv (Table 5-2 EPA-453/R-95-017). To justify the higher control efficiency, the Subpart Kb leak standard of 500 ppmv has been supplanted by 100 ppmv valves and connectors and 500 ppmv for pumps and compressors.

VII. General Calculations

A. Assumptions

Operation 24 hr/day, 365 days/yr

S-6971-1

No change in emissions is proposed.

S-6971-11, '-16-0 through '-21-0

Component counts used in the emissions calculations are included in **Attachment II**.

B. Emission Factors

Fugitive emissions factors were obtained from EPA document Protocol for Equipment Leak Emission Rates, EPA-453/R-95-017, Nov 1995, Table 2-1, "SOCMI Average Fugitive Emissions Factors." The controlled emissions are obtained by multiplying the emissions factors by LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON.

USEPA's Protocol for Equipment Emission Estimates Table 2-1 SOCMI Average factors and HON LDAR Control Efficiencies in Table 5-2 – EPA-453/R-95-017

	Emission factor (kg/hr/source)	HON LDAR Control %
Light liquid valves	0.00403	88
Light liquid pumps	0.0199	75
Compressors	0.228	75*
Connectors	0.00183	93
Open Ended Lines	0.0017	100**
Pressure Relief Valves***	0.104	92***

* assumed to be equal to the control efficiency of pumps

** HON requires use of double valves or caps on all open-ended lines

*** assumed to be equal to gas valves

C. Calculations

1. Pre-Project Potential to Emit (PE1)

The vessels to be authorized do not have permits, i.e. PE1 = 0.

The PE1 for existing permit units is quantified on each affected ATC and summarized in the table below:

PE1										
Permit Unit	NO _x		SO _x		PM ₁₀		CO		VOC	
	Lb/day	Lb/yr	Lb/day	Lb/yr	Lb/day	Lb/yr	Lb/day	Lb/yr	Lb/day	Lb/yr
S-6971-1-3	0	0	0	0	0	0	0	0	9.3	3,299
S-6971-11-0	0	0	0	0	0	0	0	0	21.5	7,848

2. Post Project Potential to Emit (PE2)

Emissions are tabulated in **Attachment II**, and summarized in the table below:

PE2										
Permit Unit	NO _x		SO _x		PM ₁₀		CO		VOC	
	Lb/day	Lb/yr	Lb/day	Lb/yr	Lb/day	Lb/yr	Lb/day	Lb/yr	Lb/day	Lb/yr
S-6971-1-4	0	0	0	0	0	0	0	0	9.3	3,299
S-6971-11-1	0	0	0	0	0	0	0	0	43.9	16,017
S-6971-16-0	0	0	0	0	0	0	0	0	0.9	339
S-6971-17-0	0	0	0	0	0	0	0	0	1.2	441
S-6971-18-0	0	0	0	0	0	0	0	0	1.5	563
S-6971-19-0	0	0	0	0	0	0	0	0	1.4	496
S-6971-20-0	0	0	0	0	0	0	0	0	4.1	1,493
S-6971-21-0	0	0	0	0	0	0	0	0	4.6	1,691
Total	0	0	0	0	0	0	0	0	0	24,339

Greenhouse Gas (GHG) Emissions

The equipment being modified and authorized by this project does not emit GHG and therefore no increase in GHG emissions is expected.

Emissions profiles are included in **Attachment III**.

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The Pre-Project Stationary Source Potential to Emit (SSPE1) is calculated in **Attachment IV** and summarized below:

SSPE1 (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE1	3,776	1,201	29,024	15,590	16,439

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The Post Project Stationary Source Potential to Emit (SSPE2) is calculated below:

SSPE2 (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE1	3,776	1,201	29,024	15,590	16,439
S-6971-1-3	0	0	0	0	-3,299
S-6971-11-0	0	0	0	0	-7,848
S-6971-1-4	0	0	0	0	3,299
S-6971-11-1	0	0	0	0	16,017
S-6971-16-0	0	0	0	0	339
S-6971-17-0	0	0	0	0	441
S-6971-18-0	0	0	0	0	563
S-6971-19-0	0	0	0	0	496
S-6971-20-0	0	0	0	0	1,493
S-6971-21-0	0	0	0	0	1,691
SSPE2	3,776	1,201	29,024	15,590	29,631

5. Major Source Determination

a. Rule 2201 Major Source Determination:

Pursuant to Section 3.23 of District Rule 2201, a major source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values.

Section 3.23.2 specifies, for the purpose of determining major source status, SSPE2 shall not include the quantity of emission reduction credits (ERC) that have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site. This ERC quantity includes all ERC held as certificates and all emission reduction credits that have been sold or transferred. CRE does not hold any ERC certificates.

Major Source Determination (lb/year)						
	NO _x	SO _x	PM ₁₀	PM _{2.5}	CO	VOC
SSPE1	3,776	1,201	29,024	29,024	15,590	16,439
SSPE2	3,776	1,201	29,024	29,024	15,590	29,631
Major Source Threshold	20,000	140,000	140,000	200,000	200,000	20,000
Major Source?	No	No	No	No	No	Yes

As seen in the table above, the facility is not an existing Major Source but will become a Major Source as a result of this project.

b. Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)							
	NO ₂	SO ₂	PM	PM ₁₀	CO	VOC	CO ₂ e
Estimated Facility PE before Project Increase	2	1	15	15	8	8	0.9*
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source ? (Y/N)	NO	NO	NO	NO	NO	NO	NO

Combustion Equipment

15 MMBtu/hr

* CO₂ Emissions = 15 MMBtu/yr x 116.89 lb/MMBtu
= 1,753 lb-CO₂(eq)/yr

CH₄ Emissions = 15 MMBtu/yr x 0.002 lb/MMBtu x 21 lb-CO₂(eq) per lb-CH₄
= 0.6 lb-CO₂(eq)/yr

N₂O Emissions = 15 MMBtu/yr x 0.0002 lb/MMBtu x 310 lb-CO₂(eq) per lb-N₂O
= 9 lb-CO₂(eq)/yr

Total = 1,763 lb-CO₂(eq)/yr/2000 lb/short ton
= 0.9 tons CO₂(eq)/yr

As shown above, the facility is not an existing major source for PSD for at least one pollutant. Therefore the facility is not an existing major source for PSD.

6. Baseline Emissions (BE)

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,

- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22

As shown above, the facility is not currently a Major Source for any criteria pollutant. Therefore Baseline Emissions (BE) are equal to the Pre-Project Potential to Emit (PE1). As calculated in Section VII.C.1 above, BE is summarized in the following table:

Permit Unit	BE (lb/year)				
	NO _x	SO _x	PM ₁₀	CO	VOC
S-6971-1-3	0	0	0	0	3,299
S-6971-11-0	0	0	0	0	7,848
S-6971-16-0	0	0	0	0	0
S-6971-17-0	0	0	0	0	0
S-6971-18-0	0	0	0	0	0
S-6971-19-0	0	0	0	0	0
S-6971-20-0	0	0	0	0	0
S-6971-21-0	0	0	0	0	0

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this facility is not an existing Major Source for any of the pollutants addressed in this project, this project does not constitute an SB 288 major modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this facility is not an existing Major Source for any pollutants, this project does not constitute a Federal Major Modification. Additionally, since the facility is not a major source for PM₁₀ (140,000 lb/year), it is not a major source for PM_{2.5} (200,000 lb/year).

9. Rule 2410 Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀
- Greenhouse gases (GHG): CO₂, N₂O, CH₄, HFCs, PFCs, and SF₆

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

The facility is NOT an existing PSD Major Source but is an existing source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

I. Potential to Emit for New or Modified Emission Units vs PSD Major Source Thresholds

As a screening tool, the project potential to emit from all new and modified units is compared to the PSD major source threshold, and if total project potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

The equipment evaluated under this project is listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination: Potential to Emit (tons/year)							
	NO ₂	SO ₂	PM	PM ₁₀	CO	VOC	CO _{2e}
Total PE from New and Modified Units	0	0	0	0	0	12	0
PSD Major Source threshold	100	100	100	100	100	100	100,000
New PSD Major Source?	NO	NO	NO	NO	NO	NO	NO

As shown in the table above, the project emission increase, for all new and modified emission units, does not exceed any of the PSD major source thresholds. Therefore Rule 2410 is not applicable and no further discussion is required.

10. Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC for each pollutant is shown in the table(s) below and reported in the PAS database emissions profile.

The QNEC shall be calculated as follows:

QNEC = (PE2 – BE)/4, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.

PE2 = Post Project Potential to Emit for each emissions unit, lb/yr.

BE = Baseline Emissions (per Rule 2201) for each emissions unit, lb/yr.

QNEC (lb/qtr) — S-6971-1-4					
Pollutant	NO _x	SO _x	PM ₁₀	CO	VOC
PE2 (lb/yr)	0	0	0	0	3,299
BE (lb/yr)	0	0	0	0	3,299
QNEC	0	0	0	0	0

QNEC (lb/qtr) — S-6971-11-1					
Pollutant	NO _x	SO _x	PM ₁₀	CO	VOC
PE2 (lb/yr)	0	0	0	0	16,017
BE (lb/yr)	0	0	0	0	7,848
QNEC	0	0	0	0	2,042

QNEC (lb/qtr) — S-6971-16-0					
Pollutant	NO _x	SO _x	PM ₁₀	CO	VOC
PE2 (lb/yr)	0	0	0	0	339
BE (lb/yr)	0	0	0	0	0
QNEC	0	0	0	0	85

QNEC (lb/qtr) — S-6971-17-0					
Pollutant	NO _x	SO _x	PM ₁₀	CO	VOC
PE2 (lb/yr)	0	0	0	0	441
BE (lb/yr)	0	0	0	0	0
QNEC	0	0	0	0	110

QNEC (lb/qtr) — S-6971-18-0					
Pollutant	NO _x	SO _x	PM ₁₀	CO	VOC
PE2 (lb/yr)	0	0	0	0	563
BE (lb/yr)	0	0	0	0	0
QNEC	0	0	0	0	141

QNEC (lb/qtr) — S-6971-19-0					
Pollutant	NO _x	SO _x	PM ₁₀	CO	VOC
PE2 (lb/yr)	0	0	0	0	496
BE (lb/yr)	0	0	0	0	0
QNEC	0	0	0	0	124

QNEC (lb/qtr) — S-6971-20-0					
Pollutant	NO _x	SO _x	PM ₁₀	CO	VOC
PE2 (lb/yr)	0	0	0	0	1,493
BE (lb/yr)	0	0	0	0	0
QNEC	0	0	0	0	373

QNEC (lb/qtr) — S-6971-21-0					
Pollutant	NO _x	SO _x	PM ₁₀	CO	VOC
PE2 (lb/yr)	0	0	0	0	1,691
BE (lb/yr)	0	0	0	0	0
QNEC	0	0	!! =(d3-d4)/4	0	423

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As seen in Section VII.C.2 of this evaluation, the applicant is proposing to authorize the six (6) tanks listed in the table below. BACT is triggered for VOC for S-6971-16, '-20, and '-21 since the PEs are greater than 2 lbs/day.

Pollutant	PE2 (lb/day)	BACT Triggered?
S-6971-16	0.9 <2	No
S-6971-17	1.2 <2	No
S-6971-18	1.5 <2	No
S-6971-19	1.4 <2	No
S-6971-20	4.1 >2	Yes
S-6971-21	4.6 >2	Yes

BACT is not triggered for units S-6971-20 and '-21.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT, for relocation of emissions units with PE > 2 lb/day purposes, is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

AIPE = PE2 – HAPE

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE2 = Post-Project Potential to Emit, (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

Where,

PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)

EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$\text{AIPE} = \text{PE2} - (\text{PE1} * (\text{EF2} / \text{EF1}))$$

$$\text{EF2} = \text{EF1}$$

S-6971-1

$$\begin{aligned} \text{AIPE} &= \text{PE2} - (\text{PE1} * (\text{EF2} / \text{EF1})) \\ &= 9.3 - 9.3 (1) \\ &= 0 \text{ lb/day} \end{aligned}$$

S-6971-11

$$\begin{aligned} \text{AIPE} &= \text{PE2} - (\text{PE1} * (\text{EF2} / \text{EF1})) \\ &= 43.9 - 21.5 (1) \\ &= 22.4 \text{ lb/day} \end{aligned}$$

As demonstrated above, the AIPE is not greater than 2.0 lb/day for S-6971-1 and greater than 2.0 lb/day for S-6971-11. BACT is triggered for S-6971-11 for modification purposes.

d. Major Modification

As discussed in Section VII.C.7 above, this project does not constitute a Major Modification; therefore BACT, for major modification purposes, is not triggered.

2. BACT Guideline

BACT Guidelines 4.12.1 and 4.12.2 apply to the revised biodiesel production operation.

BACT Guideline 7.3.1, applies to Petroleum and Petrochemical Production – Fixed Roof Organic Liquid Storage or Processing Tank, < 5,000 bbl tank capacity.

(see **Attachment V**).

3. Top-Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, a Top-Down BACT analysis (**Attachment VI**) shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule.

S-6971-11

CRE has proposed Achieved in Practice BACT for the biodiesel production operation, and the Guidelines do not demonstrate any Technologically Feasible alternatives more stringent than Achieved in Practice. BACT has been satisfied with the following:

VOC: For Valves and Connectors—Leak defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455, and

For Pump and Compressor Seals—Leak defined as a reading of methane in excess of 500 ppmv above background when measured per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455.

S-6971-17 through -21

VOC: 99% control; vapor incinerator

B. Offsets

1. Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offset calculations will be required for this project.

Offset Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE2	3,776	1,201	29,024	15,590	29,631
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	No	No	No	No	Yes

2. Quantity of Offsets Required

As seen above, the SSPE2 is greater than the offset thresholds for VOC only; therefore offset calculations will be required for this project.

Per Sections 4.7.2 and 4.7.3, the quantity of offsets in pounds per year for VOC is calculated as follows for sources with an SSPE1 less than the offset threshold levels before implementing the project being evaluated.

$$\text{Offsets required (lb/year)} = [(\text{SSPE2} - \text{ROT} + \text{ICCE}) \times \text{DOR}]$$

Where,

- SSPE2 = Post Project Stationary Source Potential to Emit
- ROT = Respective Offset Threshold, for the respective pollutant indicated in Section 4.5.3.
- ICCE = Increase in Cargo Carrier Emissions
- DOR = Distance Offset Ratio, determined pursuant to Section 4.8

Assuming an offset ratio of 1.5:1, the amount of VOC ERCs that need to be reserved is:

VOC Offsets Required (lb/year)						
	SSPE2	Emerg	ROT	ICCE	DOR	
	29,631	0	20,000	0	1.5	
VOC Offsets Required =	(29,631	- 0	- 20,000	+0)	* 1.5 =	14,447

Calculating the appropriate quarterly emissions to be reserved is as follows:

<u>1st Quarter</u>	<u>2nd Quarter</u>	<u>3rd Quarter</u>	<u>4th Quarter</u>
3,612	3,612	3,612	3,612

The applicant has stated that the facility plans to use ERC certificate S-3711-1 to offset the increases in VOC emissions associated with this project. The above certificate has available quarterly VOC credits as follows:

	<u>1st Quarter</u>	<u>2nd Quarter</u>	<u>3rd Quarter</u>	<u>4th Quarter</u>
ERC #S-3711-1	8,361	8,458	8,552	8,556

As seen above, the facility has sufficient credits to fully offset the quarterly VOC emissions increases associated with this project.

Proposed Rule 2201 (offset) Conditions:

Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter – 3612 lb, 2nd quarter - 3612 lb, 3rd quarter -3612 lb, and fourth quarter - 3612 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERC specified below. [District Rule 2201]

ERC Certificate Number S-3711-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any modification that increases the SSPE1 above offset thresholds,
- d. Any New Stationary Source project with a SSPE2 which results in the offset thresholds being surpassed, and/or
- e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. **New Major Sources, Federal Major Modifications, and SB 288 Major Modifications**

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in VII.C.7, this project does not constitute a Federal Major Modification; therefore, public noticing for Federal Major Modification purposes is not required.

Since this project is not a SB 288 Major Modification, it is also not a Federal Major Modification; therefore, public noticing for Federal Major Modification purposes is not required.

b. **PE > 100 lb/day**

Applications which include a new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

c. **Offset Threshold**

As detailed in the Offsets applicability discussion above, the VOC offset threshold will be exceeded with this project; therefore public noticing is required for offset purposes.

d. New Stationary Source with SSPE2 Greater Than Offset Thresholds

This is an existing facility; therefore, public noticing for a new stationary source exceeding offset threshold purposes is not required.

e. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e. $SSIPE = SSPE2 - SSPE1$. The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and 4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

SSIPE (lb/year)					
	NO_x	SO_x	PM₁₀	CO	VOC
SSPE2	3,776	1,201	29,024	15,590	29,631
SSPE1	3,776	1,201	29,024	15,590	16,439
SSIPE	0	0	0	0	13,192
SSIPE Public Notice Threshold	20,000	20,000	20,000	20,000	20,000
Public Notice Required?	No	No	No	No	No

As demonstrated above, the SSIPE for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

2. Public Notice Action

As discussed above, this project will result in emissions, for VOC, which would subject the project to public noticing for exceeding the offset threshold. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATC for this equipment.

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, the DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Conditions:

S-6971-1-4

Except for spillage emissions resulting from liquid line disconnects, fugitive VOC emission rate from unloading operations and methanol storage tank shall not exceed 8.9 lb/day.

Total VOC emissions from liquid line disconnections during unloading shall not exceed 0.3 lb/day nor 14 lb/year.

S-6971-11-1

VOC emission rate from this unit shall not exceed 43.9 lb/day based on component count and emission factors from EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCM Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals (100% if seal-less compressors), 93% connectors, 100% open ended lines, 92% pressure relief valves, 100% sampling connectors). [District Rule 2201] N

S-6971-16 through '21:

Fugitive VOC emissions rate from components affixed to the tank and in the vapor line from the tank to the vapor control system trunk line shall be calculated using EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCM Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals, 93% connectors, 0% open ended lines, and 92% pressure relief valves). Permittee shall maintain with the permit an accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using above specified leak rates and control efficiencies. [District Rule 2201] N

Fugitive VOC emission rate from tank and from all components affixed to the tank in the vapor line from the tank to the vapor control system trunk line shall not exceed XX lb/day. [District Rule 2201] N

E. Compliance Assurance

1. Source Testing

Fugitive emission source operations are not subject to startup source testing.

2. Monitoring

S-6971-11-0:

Compliance with Rule 4455 OMP will satisfy Rule 2201 monitoring.

S-6971-16 through '21:

Monitoring in the form of a leak detection and repair (LDAR) program will assure leaking components are identified and repaired in a timely manner.

3. Record Keeping

The operator will be required to keep records of all parameters that are required by the Rules 4455 and 4623.

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

F. Ambient Air Quality Analysis

Section 4.14.1 of this Rule requires that an ambient air quality analysis (AAQA) be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. The Technical Services Division of the SJVAPCD conducted the required analysis. However, there are no AAQ standards for VOCs and therefore a AAQA is not required.

Rule 2520 Federally Mandated Operating Permits

Since this facility's emissions will exceed the major source thresholds of District Rule 2201 with implementation of the ATCs from this project, this facility will become a Major Source. Pursuant to Section 5.1, and as required by permit condition, the facility will have up to 12 months from the date of ATC implementation to either submit a Title V Application or comply with District Rule 2530 *Federally Enforceable Potential to Emit*. The following condition is included on the ATC:

Facility will have up to 12 months from the date of ATC issuance to either submit a Title V Application or comply with District Rule 2530 Federally Enforceable Potential to Emit. [District Rules 2520 and 2530] N

Rule 4001 New Source Performance Standards (NSPS)

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

40 CFR Part 60, Subpart A, section 14, defines the meaning of modification to which the the standards are applicable. §60.14, paragraph (e)(5) states that the following will not be considered as a modification: *"the addition or use of any system or device whose primary function is the reduction of air pollutants, except when an emission control system is removed or replaced by a system which the Administrator determines to be less environmentally beneficial"*.

The authorized tanks S-6971-16 through '-21 are existing and no physical changes are proposed. They are not newly constructed or reconstructed units nor are they being modified (as defined above). There is no change in emissions from S-6971-16 through '-21. Therefore the project does not trigger requirements of the Subpart.

40 CFR 60, Subpart VVa - Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry

Pursuant to Section 60.480a(a)(1), *Applicability and Designation of Affected Facility*, the provisions of this subpart apply to affected facilities in the synthetic organic chemicals manufacturing industry. PTO S-6971-11-0 includes conditions ensuring compliance with the subpart. Continued compliance is expected.

40 CFR 60, Subpart NNN - Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations, and

40 CFR 60, Subpart RRR - Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes

Based on the memorandum from Environment Protection Agency (EPA), Washington DC, dated October 07, 1996, and the memorandum from EPA Washington DC, dated September 06, 1998, 40 CFR Part 60 Subpart NNN and Subpart RRR are applicable to facilities involved in synthesis of organic chemicals using petroleum-based feedstocks and not chemicals extracted from natural sources.

CRE is producing biodiesel from vegetable oils, tallow and methanol. The distillation operations and reactor processes at the facility are not subject to the requirements of 40 CFR Part 60, Subpart NNN or Subpart RRR.

Rule 4101 Visible Emissions

Per Section 5.0, no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour that is as dark as or darker than Ringelmann 1 (or 20% opacity). The facility consists primarily of fluid-handling processes. Visible emissions are not typical for this source and category of operation. Compliance with this rule is expected.

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations provided the equipment is well maintained. Therefore, compliance with this rule is expected.

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than or equal to one. According to the Technical Services Memo for this project (**Attachment VII**), the total facility prioritization score including this project was less than or equal to one.

Therefore, no future analysis is required to determine the impact from this project and compliance with the District's Risk Management Policy is expected.

Rule 4455 Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants

This rule limits VOC emissions from leaking components at petroleum refineries, gas liquid process facilities and chemical plants, and is applicable to components that contain or contact VOC at such facilities. Rule requirements are included on ATC S-6971-11-1. The authorized tanks S-6971-16 through '-21 are not subject to the rule (Section 4.1). Continued compliance is expected.

Rule 4623 Storage of Organic Liquids

Section 5.1 requires that an operator shall not place, hold, or store organic liquid in any tank unless such tank is equipped with a VOC control system. For the sodium methyrate storage tanks, this requirement will be satisfied by connecting them to the proposed gas blanket and vapor control system, to be identified on permit S-6971-1.

Pursuant to Section 6.3.1, an operator whose tanks are subject to the requirements of this rule shall keep an accurate record of each organic liquid stored in each tank, including its storage temperature, TVP, and API gravity.

Proposed Conditions for S-6971-16-0, -17-0, -18-0, -19-0, -20-0, and -21-0:

All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623] N

A leak-free 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] N

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] N

Fugitive VOC emissions rate from components affixed to the tank and in the vapor line from the tank to the vapor control system trunk line shall be calculated using EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCM I Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals, 93% connectors, 0% open ended lines, and 92% pressure relief valves). Permittee shall maintain with the permit an accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using above specified leak rates and control efficiencies. [District Rule 2201] N

Fugitive VOC emission rate from tank and from all components affixed to the tank in the vapor line from the tank to the vapor control system trunk line shall not exceed 5.0 lb/day. [District Rule 2201] N

If any of the tank components are found to be leaking above background (>100 ppmv for valves and connectors and 500 ppmv for pump and compressor seals), as measured by a portable hydrocarbon

detection instrument in accordance with the procedures specified in EPA Test Method 21), operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 & 4623, 5.1.3] N

All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623] N

Any component found to be leaking by the operator with a reading > 10,000 ppmv, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623] N

Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623] N

Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623] N

Upon detection of a gas leak, defined as a VOC concentration >100 ppmv for valves and connectors and >500 ppmv for pump and compressor seals as measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623] N

Leaking components, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, and that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623] N

If a component type for a given tank is found to leak, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623] N

California Health & Safety Code 42301.6 (School Notice)

The District shall verify that this site is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue Authorities to Construct S-6971-1-4, -11-1, -16-0, -17-0, -18-0, -19-0, -20-0, and -21-0 (**Attachment VIII**).

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-6971-1	3020-05-E	142,800 gallons	\$246.00
S-6971-11	3020-01-F	400-799 elec. hp	\$607.00
S-6971-16	3020-05-E	142,800 gallons	\$246.00
S-6971-17	3020-05-A	4,000 gallons	\$32.00
S-6971-18	3020-05-A	2,500 gallons	\$32.00
S-6971-19	3020-05-B	15,000 gallons	\$93.00
S-6971-20	3020-05-B	6,000 gallons	\$93.00
S6971-21-0	3020-05-B	6,000 gallons	\$93.00

Attachments

- I: PTOs S-6971-1-2 and '-11-0
- II: Emissions Calculations
- III: Emissions Profiles
- IV: SSPE1 Calculation
- V: BACT Guidelines
- VI: BACT Analysis
- VII: HRA
- VIII: Draft ATCs

ATTACHMENT I
PTOs S-6971-1-2 and '-11-0

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-6971-1-3

EXPIRATION DATE: 05/31/2018

EQUIPMENT DESCRIPTION:

142,500 GALLON FIXER ROOF METHANOL STORAGE TANK AND ACCOMPANYING UNLOADING OPERATION, SERVED BY A SHARED GAS BLANKETING/VAPOR CONTROL SYSTEM SHARED WITH S-6971-5 AND '8 DISCHARGING TO VAPOR SURGE VESSEL (VRT-110) AND VAPOR INCINERATOR LISTED ON S-1388-12

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. For this Class 1 organic liquid transfer facility, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District Rule 4624]
4. All liquids and gases from the transfer operation shall be routed to one of the following systems: a vapor collection and control system; a fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); a floating roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a closed VOC emission control system. [District Rules 4623 and 4624]
5. The operator of an organic liquid transfer facility 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 test method prescribed in Section 6.3.8 of Rule 4624. [District Rule 4624]
6. 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 the inspections required under provisions of Sections 5.9.1 and 5.9.2 of Rule 4624 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency shall revert back to quarterly and the operator shall contact the APCO in writing within 14 days. [District Rule 4624]
7. 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 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]
8. Operator shall keep records of the throughputs of materials transferred and the results of any required leak inspections. [District Rules 4455 and 4624]
9. The methanol tank shall be equipped with a gas blanketing/vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and discharges only to vapor surge vessel (VRT-110) or the vapor incinerator listed on permit S-1388-12. Vapor incinerator listed on S-1388-12 shall be operated to reduce VOC emissions by 95% or greater. The gas blanketing/vapor control system shall not have any gas leaks in excess of 10,000 ppmv above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623. [District Rules 2201 and 4623 and 40 CFR 60.112b(a)(3)(ii)]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Upon detection of any leak >10,000 ppmv above background, the operator shall eliminate the leak within 8 hours after detection, or if the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices and eliminate the leak within 48 hours after minimization. In no event shall the total time to eliminate the leak exceed 56 hours after detection. [District Rule 2201 and 4623 and 40 CFR 60.112b(a)(3)(i)]
11. If any of the tank or gas blanketing/vapor control system components are found with detectable leaks >100 ppmv and < 10,000 ppmv above background for valves and connectors and >500 ppmv and < 10,000 ppmv above background for pump and compressor seals, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 40 CFR 60.112b(a)(3)(i)]
12. Storage tank or gas blanketing/vapor control system components with detectable leaks >100 ppmv and < 10,000 ppmv above background for valves and connectors and >500 ppmv and < 10,000 ppmv above background for pump and compressor seals shall be repaired pursuant to the requirements and schedule established in Rule 4455. [District Rule 2201 and 40 CFR 60.112b(a)(3)(i)]
13. Except for spillage emissions resulting from liquid line disconnections, VOC emission rate from unloading operations and methanol storage tank shall not exceed 9.0 lb/day based on component count and emission factors from EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCOMI Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals, 93% connectors, 0% open ended lines, and 92% pressure relief valves). Permittee shall maintain with the permit an accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using above specified leak rates and control efficiencies. [District Rule 2201]
14. Total VOC emissions from liquid line disconnections during unloading shall not exceed 0.3 lb/day and 14 lb/year. [District Rule 2201]
15. Maximum number of liquid line disconnections shall not exceed 18/day and 823/year. [District Rule 2201]
16. The maximum volume of methanol spilled during each disconnection shall not exceed 10 milliliters. [District Rule 2201]
17. All piping, fittings, and valves directly affixed to the tank or associated with the tank gas blanketing/vapor control system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. [District Rules 2201, 4623 and 40 CFR 60.112b(a)(3)(i)]
18. If a component type for a given tank is found to leak at a rate >10,000 ppmv above background during an annual inspection, then quarterly inspections of that component type on the tank or system shall be conducted for four consecutive quarters. After four successful quarterly inspections in which the component type is found to leak less than 10,000 ppmv, inspections interval may revert to annual. [District Rule 2201 and 4623 and 40 CFR 60.112b(a)(3)(i)]
19. The operator shall keep a copy of an APCO-approved fugitive component Operator Management Plan (OMP) at the facility. The plan shall conform to the requirements set forth in Rule 4455 and shall be made available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rules 2201, 4455 and 4623 and 40 CFR 60.113b(c)(1)(i) and (ii) and 40 CFR 60.115b(c)(1)]
20. In accordance with the approved OMP, the operator shall meet all applicable operating, inspection and re-inspection, maintenance, process pressure relief device (PRD), component identification, recordkeeping and notification requirements of Rule 4455 for all components containing or contacting VOC at the this gas liquids processing facility, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rules 2201 and 4455 and 40 CFR 60.113b(c)(1)(i) and (ii)]
21. Operator shall notify the Administrator of the actual date of initial startup postmarked within 15 days after such date. [40 CFR 60.7 (a)(3)]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

22. Operator shall notify the Administrator of the date construction is commenced postmarked no later than 30 days after such date. Notification shall include the Operating Plan. [40 CFR 60.113b(c)(1) and 60.7 (a)(1)]
23. Permittee shall comply with all notification and recordkeeping requirements of 40 CFR Part 60.7. [40 CFR 60.7]
24. Daily and annual records shall be kept of the number of unloading rack disconnects. [District Rule 2201]
25. All records required by this permit shall be retained for a minimum period of 5 years and shall be made available to the APCO, ARB and US EPA upon request. [District Rule 2201 and 4623 and CFR 60.115b(c)(2)]

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-6971-11-0

EXPIRATION DATE: 05/31/2018

EQUIPMENT DESCRIPTION:

BIODIESEL PRODUCTION OPERATION INCLUDING HFFA PRETREATMENT, TRANSESTERIFICATION, WASH WATER AND REMOVAL, GLYCERIN RECOVERY, AND METHANOL RECOVERY SKIDS, NITROGEN BLANKET/VAPOR CONTROL SYSTEM VENTED TO S-6971-1 VAPOR CONTROL SYSTEM

PERMIT UNIT REQUIREMENTS

1. This permit includes the following permit exempt process equipment: loading operations for, and tank storage of biodiesel and glycerol; unloading operations for, and tank storage of vegetable oils and glycerol. [District Rule 2020]
2. VOC emission rate from this unit shall not exceed 3.7 lb/day based on component count and emission factors from EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCOMI Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals (100% if seal-less compressors), 93% connectors, 100% open ended lines, 92% pressure relief valves, 100% sampling connectors). [District Rule 2201]
3. A component shall be considered leaking if one or more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of Rule 4455 exist at the facility. For this permit unit, except for pumps and compressors, a minor gas leak shall be defined for any component listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service as a reading in excess of 100 ppmv above background up to and including a reading of 10,000 ppmv above background. For pumps, compressors and other component types not specifically listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service, a minor gas leak shall be defined as a reading in excess of 500 ppmv above background up to and including a reading of 10,000 ppmv above background. Readings shall be taken as methane using a portable hydrocarbon detection instrument and shall be made in accordance with the methods specified in Section 6.4.1 of Rule 4455. [District NSR Rule and Rule 4455, 5.1.4]
4. The operator shall not use any component that leaks in excess of the allowable leak standards of Rule 4455, or is found to be in violation of the provisions specified in Section 5.1.3. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the rule. [District Rule 4455, 5.1.1]
5. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2]
6. The operator shall be in violation of Rule 4455 if any District inspection demonstrates that one or more of the conditions in Sections 5.1.4 exist at the facility. [District Rule 4455, 5.1.3.1]
7. Except for annual operator inspection described in Section 5.1.3.2.3, any operator inspection that demonstrates that one or more of the conditions in Section 5.1.4 exist at the facility shall not constitute a violation of Rule 4455 if the leaking components are repaired as soon as practicable but not later than the time frame specified in Rule 4455. Such components shall not be counted towards determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.1]

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8. Leaking components detected during operator inspection pursuant Section 5.1.3.2.1 that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in Rule 4455 shall be counted toward determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.2]
9. Any operator inspection conducted annually for a component type (including operator annual inspections pursuant to Section 5.2.5, 5.2.6, 5.2.7, or 5.2.8) that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall constitute a violation of Rule 4455 regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in Rule 4455. [District Rule 4455, 5.1.3.2.3]
10. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and Pressure Relief Devices (PRDs) in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be reinspected within 24 hours using a portable analyzer. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3. [District Rule 4455, 5.2.1 & 5.2.2]
11. The operator shall inspect all components at least once every calendar quarter, except for inaccessible components, unsafe-to-monitor components and pipes. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5, 5.2.6, and 5.2.7. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Components shall be inspected using EPA Method 21. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6 & 5.2.7]
12. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs which shall continue to be inspected on a quarterly basis. [District Rule 4455, 5.2.8]
13. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of Rule 4455 during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five (5) calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 & 5.2.10]
14. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11]
15. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12]
16. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag that contains the information specified in Section 5.3.3. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of Rule 4455. [District Rule 4455, 5.3.1 5.3.2 and 5.3.3]
17. An operator shall minimize all component leaks immediately to the extent possible, but not later than one (1) hour after detection of leaks in order to stop or reduce leakage to the atmosphere. [District Rule 4455, 5.3.4]
18. If the leak has been minimized but the leak still exceeds the applicable leak standards of Rule 4455, an operator shall repair or replace the leaking component, vent the leaking component to a closed vent system, or remove the leaking component from operation as soon as practicable but not later than the time period specified in Table 3. For each calendar quarter, the operator may be allowed to extend the repair period as specified in Table 3, for a total number of leaking components, not to exceed 0.05 percent of the number of components inspected, by type, rounded upward to the nearest integer where required. [District Rule 4455, 5.3.5]

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19. If the leaking component is an essential component or a critical component and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized, but the leak still exceeds any of the applicable leak standards of Rule 4455, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455 5.3.6]
20. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or any combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall comply with at least one of the requirements specified in Sections 5.3.7.1, 5.3.7.2, 5.3.7.3, or 5.3.7.4 by the applicable deadlines specified in Sections 5.3.7.5 and 5.3.7.6. If the original leaking component is replaced with a new like-in-kind component before incurring five repair actions for major leaks within 12-consecutive months, the repair count shall start over for the new component. An entire compressor or pump need not be replaced provided the compressor part(s) or pump part(s) that have incurred five repair actions as described in Section 5.3.7 are brought into compliance with at least one of the requirements of Sections 5.3.7.1 through 5.3.7.6. [District Rule 4455, 5.3.7]
21. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1]
22. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the APCO that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. The operator shall comply with the requirements of Sections 6.1.4 if there is any change in the description of major components or critical components. [District Rule 4455, 5.5.1 & 5.5.2]
23. The operator shall keep a copy of the operator management plan at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved operator management plan. [District Rule 4455, 6.1.2 & 6.1.4]
24. The operator shall maintain an inspection log containing, at a minimum, 1) total number of components inspected, and total number and percentage of leaking components found by component types, 2) location, type, name or description of each leaking component, and description of any unit where the leaking component is found, 3) date of leak detection and method of leak detection, 4) for gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, 5) date of repair, replacement, or removal from operation of leaking components, 6) identification and location of essential component and critical components found leaking that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 7) methods used to minimize the leak from essential components and critical components that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 8) after the component is repaired or is replaced, the date of reinspection and the leak concentration in ppmv, 9) inspector's name, business mailing address, and business telephone number, and 10) the facility operator responsible for the inspection and repair program shall sign and date the inspection log certifying the accuracy of the information recorded in the log. [District Rule 4455, 6.2.1]
25. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, analyzer reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration. [District Rule 4455, 6.2.3]

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26. The operator shall notify the APCO, by telephone or other methods approved by the APCO, of any process PRD release described in Sections 5.4.4 and 5.4.5, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. [District Rule 4455, 6.3.1]
27. The operator shall submit a written report to the APCO within thirty (30) calendar days following a PRD release subject to 6.3.1. The written report shall include 1) process PRD type, size, and location, 2) date, time and duration of the process PRD release, 3) types of VOC released and individual amounts, in pounds, including supporting calculations, 4) cause of the process PRD release, and 5) corrective actions taken to prevent a subsequent process PRD release. [District Rule 4455 6.3.2]
28. Copies of all records shall be retained for a minimum of five (5) years after the date of an entry. Such records shall be made available to the APCO, ARB, or US EPA upon request. [District Rule 4455, 6.2.2, 6.2.3 & 6.2.4]
29. Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4455, 6.4.1]
30. The VOC content shall be determined using American Society of Testing and Materials (ASTM) D 1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 for liquids. [District Rule 4455, 6.4.2]
31. The percent by volume liquid evaporated at 150C shall be determined using ASTM D 86. [District Rule 4455, 6.4.3]
32. Each owner or operator subject to the provisions of this subpart shall demonstrate compliance with the requirements of 40 CFR 60.482-1a through 60.482-10a or 40 CFR 60.480a(e) for all equipment within 180 days of initial startup. [40 CFR 60.482-1a(a)]
33. Valves in gas/vapor service and in light liquid service shall be monitored for the first time within 30 days after the initial startup date for the process unit as required by 40 CFR 60.482-2a and 40 CFR 60.482-7a. [40 CFR 60.482-2a (a) and 40 CFR 60.482-7 a(a)]
34. Compliance with 40 CFR 60.482-1a to 60.482-10a will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in 40 CFR 60.485a. [40 CFR 60.482-1a(b)]
35. An owner or operator may request a determination of equivalence of a means of emission limitation to the requirements of 40 CFR 60.482-2a, 60.482-3a, 60.482-5a, 60.482-6a, 60.482-7a, 60.482-8a, and 60.482-10a as provided in 40 CFR 60.484a. [40 CFR 60.482-1a(c)(1)]
36. If the Administrator makes a determination that a means of emission limitation is at least equivalent to the requirements of 40 CFR 60.482-2a, 60.482-3a, 60.482-5a, 60.482-6a, 60.482-7a, 60.482-8a, or 60.482-10a, an owner or operator shall comply with the requirements of that determination. [40 CFR 60.482-1a(c)(2)]
37. Equipment that is in vacuum service is excluded from the requirements of 40 CFR 60.482-2a to 40 CFR 60.482-10a if it is identified as required in 40 CFR 60.486a(e)(5). [40 CFR 60.482-1a(d)]
38. Each pump in light liquid service (PLLS) shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485a(b), except as provided in 40 CFR 60.482-1a(c) and 40 CFR 60.482-2a(d), (e), and (f). Each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. A leak is detected if an instrument reading of 500 ppmv or greater is measured or if there are indications of liquids dripping from the pump seal. [40 CFR 60.482-2a(a) and (b), and District Rule 2201]
39. When a leak is detected for each PLLS, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9a. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [40 CFR 60.482-2a(c)]

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40. Each PLLS equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of 40 CFR 60.482-2a(a) provided the requirements specified in 40 CFR 60.482-2a(d)(1) through (6) are met. [40 CFR 60.482a(d)]
41. Any PLLS that is designated, as described in 40 CFR 60.486a(e)(1) and (2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppmv above background, is exempt from the requirements of 40 CFR 60.482-2a(a), (c), and (d) if the pump meets the requirements specified in 40 CFR 60.482-2a(e)(1), (2), and (3). [40 CFR 60.482-2a(e), and District Rule 2201]
42. If any PLLS is equipped with a closed vent system capable of capturing and transporting leakage from the seal or seals to a control device that complies with the requirements of 40 CFR 60.482-10a, it is exempt from the requirements of 40 CFR 60.482-2a(a) through (e). [40 CFR 60.482-2a(f)]
43. Any pump in PLLS that is designated, as described in 40 CFR 60.486a(f)(1), as an unsafe-to-monitor pump is exempt from the monitoring and inspection requirements of 40 CFR 60.482-2a(a) and 40 CFR 60.482-2a(d)(4) through (6) if:
1) The owner or operator of the pump demonstrates that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 60.482-2a(a); and 2) The owner or operator of the pump has a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment according to the procedures in 40 CFR 60.482-2a(c) if a leak is detected. [40 CFR 60.482-2a(g)]
44. Any pump that is located within the boundary of an unmanned plant site is exempt from the weekly visual inspection requirement of 40 CFR 60.482-2a(a)(2) and (d)(4) and the daily requirements of 40 CFR 60.482-2a(d)(5), provided that each pump is visually inspected as often as practicable and at least monthly. [40 CFR 60.482-2a(h)]
45. Unless exempt under 40 CFR 60.482-3a, each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 CFR 60.482-3a(h) and (i). The barrier fluid system shall be in heavy liquid service or shall not be in VOC service. Each compressor shall be operated and equipped as specified in 40 CFR 60.482-3a(b)(1), (2), or (3). [40 CFR 60.482-3a(a), (b), and (c)]
46. If a barrier fluid system is used for a compressor, the barrier fluid system shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system or both. Each sensor shall be checked daily or shall be equipped with an audible alarm. The owner or operator shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both. If the sensor indicates failure of the seal system, the barrier system, or both based on the established criterion, a leak is detected. [40 CFR 60.482-3a(d), (e), and (f)]
47. If a barrier fluid system is used for a compressor, detected leaks shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9a. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [40 CFR 60.482-3a(g)]
48. Any compressor that is designated, as described in 40 CFR 60.486a(e)(1) and (2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppmv above background, is exempt from the requirements of 40 CFR 60.482-3a(a) through (h) if the compressor meets the requirements specified in 40 CFR 60.482-3a(i)(1) and (2). [40 CFR 60.482-3a(i), and District Rule 2201]
49. Any existing reciprocating compressor in a process unit which becomes an affected facility under the provisions of 40 CFR 60.14 or 40 CFR 60.15 is exempt from 40 CFR 60.482a(a), (b), (c), (d), (e), and (h), provided the owner or operator demonstrates that recasting the distance piece or replacing the compressor are the only options available to bring the compressor into compliance with the provisions of 40 CFR 60.482-3a(a), (b), (c), (d), (e), and (h). [40 CFR 60.482-3a(j)]
50. Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 100 ppm above background, as determined by the methods specified in 40 CFR 60.485a(c). [40 CFR 60.482-4a(a), and District Rule 2201]

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51. After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 100 ppm above background, as soon as practicable, but no later than 5 calendar days after the pressure release, except as provided in 40 CFR 60.482-9a. No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 100 ppm above background, by the methods specified in 40 CFR 60.485a(c). [40 CFR 60.482-4a(b), and District Rule 2201]
52. Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device as described in 40 CFR 60.482-10a is exempted from the requirements of 40 CFR 60.482-4a(a) and (b). [40 CFR 60.482-4a(c)]
53. Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the 40 CFR 60.482-4a(a) and (b), provided the owner or operator complies with the requirements in 40 CFR 60.482-4a(d)(2) of this section. After each pressure release, a new rupture disk shall be installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 60.482-9a. [40 CFR 60.482-4a(d)]
54. Except for in-situ sampling systems and sampling systems without purges, each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 60.482-1a(c). Each closed-purge, closed-loop, or closed-vent system shall comply with the requirements specified in 40 CFR 60.482-5a(b)(1), (2), (3), and (4). [40 CFR 60.482-5a(a), (b), and (c)]
55. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 60.482-1a(c). The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with this condition at all other times. [40 CFR 60.482-6a(a) and (c)]
56. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. [40 CFR 60.482-6a(b)]
57. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of 40 CFR 60.482-6a(a), (b) and (c). [40 CFR 60.482-6a(d)]
58. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in 40 CFR 60.482-6a(a) through (c) are exempt from the requirements of 40 CFR 60.482-6a(a) through (c). [40 CFR 60.482-6a(e)]
59. Each valve in gas/vapor service and in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485a(b) and shall comply with 40 CFR 60.482-7a(b) through (e), except as provided in 40 CFR 60.482-7a(f), (g), and (h), 40 CFR 60.483-1a, 40 CFR 60.483-2a, 40 CFR 60.482-1a(c), and 40 CFR 60.482-1a(f). A leak is detected if an instrument reading of 100 ppmv or greater is measured. [40 CFR 60.482-7a(a) and (b), and District Rule 2201]
60. Any valve in gas/vapor service or in light liquid service for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months. [40 CFR 60.482-7a(c)(1) and (2)]
61. When a leak is detected for any valve in gas/vapor service or in light liquid service, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 60.482-9a. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the best practices specified in 40 CFR 60.482-7a(e)(1), (2), (3), and (4), where practicable. [40 CFR 60.482-7a(d) and (e)]

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62. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486a(e)(2), for no detectable emissions, as indicated by an instrument reading of less than 100 ppmv above background, is exempt from the requirements of 40 CFR 60.482-7a(a) if the valve meets the requirements specified in 40 CFR 60.482-7a(f)(1), (2), and (3). [40 CFR 60.482-7a(f), and District Rule 2201]
63. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486a(f)(1), as an unsafe-to-monitor valve is exempt from the requirements of 40 CFR 60.482-7a(a) if: 1) The owner or operator of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 60.482-7a(a); and 2) The owner or operator of the valve adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times. [40 CFR 60.482-7a(g)]
64. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486a(f)(2), as a difficult-to-monitor valve is exempt from the requirements of 40 CFR 60.482-7a(a) if: 1) The owner or operator of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface; 2) The process unit within which the valve is located either becomes an affected facility through 40 CFR 60.14 or 40 CFR 60.15 or the owner or operator designates less than 3.0 percent of the total number of valves as difficult-to-monitor; and 3) The owner or operator of the valve follows a written plan that requires monitoring of the valve at least once per calendar year. [40 CFR 60.482-7a(h)]
65. If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, the owner or operator shall follow either one of the following procedures: 1) The owner or operator shall monitor the equipment within 5 days by the method specified in 40 CFR 60.485a(b) and shall comply with the requirements of 40 CFR 60.482-8a(b) through (d); or 2) The owner or operator shall eliminate the visual, audible, olfactory, or other indication of a potential leak. A leak is detected if an instrument reading of 100 ppmv or greater for valves and connectors and 500 ppmv or greater for pumps and compressor seals, is measured. [40 CFR 60.482-8a(a) and (b); and District Rule 2201]
66. When a leak is detected in pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9a. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the best practices described under 40 CFR 60.482-2a(c)(2) and 40 CFR 60.482-7a(e). [40 CFR 60.482-8a(c) and (d)]
67. For closed vent systems and control devices, vapor recovery systems shall be designed and operated to recover the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent. [40 CFR 60.482-10a(b)]
68. For closed vent systems and control devices, enclosed combustion devices shall be designed and operated to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 degrees C. [40 CFR 60.482-10a(c)]
69. Owners or operators of control devices shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs. [40 CFR 60.482-10a(e)]
70. Except as provided in 40 CFR 60.482-10a(i) through (k), each closed vent system shall be inspected according to the procedures and schedule specified in 40 CFR 60.482-10a(f)(1) and (f)(2). Leaks, as indicated by an instrument reading greater than 100 ppmv for valves and connectors or 500 ppmv for pumps and compressor seals above background or by visual inspections, shall be repaired as soon as practicable except as provided in 40 CFR 60.482-10a(h). A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. Repair shall be completed no later than 15 calendar days after the leak is detected. [40 CFR 60.482-10a(f) and (g), and District Rule 2201]
71. Delay of repair of a closed vent system for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next process unit shutdown. [40 CFR 60.482-10a(h)]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

72. If a vapor collection system or closed vent system is operated under a vacuum, it is exempt from the inspection requirements of 40 CFR 60.482-10a(f)(1)(i) and (f)(2). [40 CFR 60.482-10a(i)]
73. Any parts of the closed vent system that are designated, as described in 40 CFR 60.482-10a(l)(1), as unsafe to inspect are exempt from the inspection requirements of 40 CFR 60.482-10a(f)(1)(i) and (f)(2) if they comply with the requirements specified in 40 CFR 60.482-10a (j)(1) and (j)(2). [40 CFR 60.482-10a(j)]
74. Any parts of the closed vent system that are designated, as described in 40 CFR 60.482-10a(l)(2), as difficult to inspect are exempt from the inspection requirements of 40 CFR 60.482-10a(f)(1)(i) and (f)(2) if they comply with the requirements specified in 40 CFR 60.482-10a(k)(1) through (k)(3). [40 CFR 60.482-10a(k)]
75. The owner or operator shall record the following information: 1) Identification of all parts of the closed vent system that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment; 2) Identification of all parts of the closed vent system that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment; 3) For each inspection during which a leak is detected, a record of the information specified in 40 CFR 60.486a(c); 4) For each inspection conducted in accordance with 40 CFR 60.485a(b) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected; and 5) For each visual inspection conducted in accordance with 40 CFR 60.482-10a(f)(1)(ii) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 60.482-10a(l)]
76. Closed vent systems and control devices shall be operated at all times when emissions may be vented to them. [40 CFR 60.482-10a(m)]
77. The owner or operator may elect to comply with the applicable provisions for valves in gas/vapor service and in light liquid service as specified in 40 CFR 60.483-1a and 60.483-2a. [40 CFR 60.483-1a and 60.483-2a]
78. The owner or operator may apply to the Administrator for a determination of equivalency for any means of emission limitation that achieves a reduction in emissions of VOC at least equivalent to the reduction in emissions of VOC achieved by the controls required in Subpart VVa. [40 CFR 60.484a(a)]
79. The owner or operator shall determine compliance with the standards in 40 CFR 60.482a, 60.483a, and 60.484a as follows: Method 21 shall be used to determine the presence of leaking sources. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21. The following calibration gases shall be used: (i) Zero air (less than 10 ppmv of hydrocarbon in air); and (ii) A mixture of methane or n-hexane and air at a concentration of about, but less than, 100 ppmv methane or n-hexane for valves and connectors and 500 ppmv methane or n-hexane for pumps and compressor seals. [40 CFR 60.485a(b); and District Rule 2201]
80. The owner or operator shall determine compliance with the no detectable emission standards in 40 CFR 60.482-2a(e), 60.482-3a(i), 60.482-4a, 60.482-7a(f), and 60.482-10a(e) as follows: 1) The requirements of 40 CFR 60.485a(b) shall apply. 2) Method 21 shall be used to determine the background level. All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 100 ppmv methane for valves and connectors and 500 ppmv methane for pumps and compressor seals for determining compliance. [40 CFR 60.485a(c); and District Rule 2201]
81. The owner or operator shall test each piece of equipment unless demonstrated that a process unit is not in VOC service, i.e., that the VOC content would never be reasonably expected to exceed 10 percent by weight. For purposes of this demonstration, the following methods and procedures shall be used: 1) Procedures that conform to the general methods in ASTM E260-73, 91, or 96, E168-67, 77, or 92, E169-63, 77, or 93 (incorporated by reference as seen in 40 CFR 60.17) shall be used to determine the percent VOC content in the process fluid that is contained in or contacts a piece of equipment; 2) Organic compounds that are considered by the Administrator to have negligible photochemical reactivity may be excluded from the total quantity of organic compounds in determining the VOC content of the process fluid; and 3) Engineering judgment may be used to estimate the VOC content, if a piece of equipment had not been shown previously to be in service. If the Administrator disagrees with the judgment, the previous two procedures as specified in 40 CFR 60.485a(d)(1) and (2) shall be used to resolve the disagreement. [40 CFR 60.485a(d)]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

82. The owner or operator shall demonstrate that an equipment is in light liquid service by showing that all the following conditions apply: 1) The vapor pressure of one or more of the components is greater than 0.3 kPa at 20 °C (1.2 in. H₂O at 68 degrees F). Standard reference texts or ASTM D2879-83, 96, or 97 (incorporated by reference as seen in 40 CFR 60.17) shall be used to determine the vapor pressures; 2) The total concentration of the pure components having a vapor pressure greater than 0.3 kPa at 20 degrees Celsius is equal to or greater than 20 percent by weight; and 3) The fluid is a liquid at operating conditions. [40 CFR 60.485a(e)]
83. An owner or operator of more than one affected facility subject to the provisions Subpart VVa may comply with the recordkeeping requirements for these facilities in one recordkeeping system if the system identifies each record by each facility. [40 CFR 60.486a(a)]
84. When each leak is detected as specified in 40 CFR 60.482-2a, 60.482-3a, 60.482-7a, 60.482-8a, and 60.483-2a, the following requirements apply: 1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment; 2) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in 40 CFR 60.482-7a(c) and no leak has been detected during those 2 months; and 3) The identification on equipment except on a valve, may be removed after it has been repaired. [40 CFR 60.486a(b)]
85. When each leak is detected as specified in 40 CFR 60.482-2a, 60.482-3a, 60.482-7a, 60.482-8a, and 60.483-2a, the following information shall be recorded in a log and shall be kept for 5 years in a readily accessible location: 1) The instrument and operator identification numbers and the equipment identification number; 2) The date the leak was detected and the dates of each attempt to repair the leak; 3) Repair methods applied in each attempt to repair the leak; 4) "Above 100 ppmv for valves and connectors or 500 ppmv for pumps and compressor seals" if the maximum instrument reading measured by the methods specified in 40 CFR 60.485a(a) after each repair attempt is equal to or greater than 100 ppmv for valves and connectors or 500 ppmv for pumps and compressor seals; 5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak; 6) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown; 7) The expected date of successful repair of the leak if a leak is not repaired within 15 days; 8) Dates of process unit shutdown that occur while the equipment is unrepaired; and 9) The date of successful repair of the leak. [40 CFR 60.486a(c); and District Rule 2201]
86. The following information pertaining to the design requirements for closed vent systems and control devices described in 40 CFR 60.482-10a shall be recorded and kept in a readily accessible location: 1) Detailed schematics, design specifications, and piping and instrumentation diagrams; 2) The dates and descriptions of any changes in the design specifications; 3) A description of the parameter or parameters monitored, as required in 40 CFR 60.482-10a(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring; 4) Periods when the closed vent systems and control devices required in 40 CFR 60.482-2a, 60.482-3a, 60.482-4a, and 60.482-5a are not operated as designed, including periods when a flare pilot light does not have a flame; and 5) Dates of startups and shutdowns of the closed vent systems and control devices required in 40 CFR 60.482-2a, 60.482-3a, 60.482-4a, and 60.482-5a. [40 CFR 60.486a(d)]
87. The following information pertaining to all equipment subject to the requirements in 40 CFR 60.482-1a to 60.482-10a shall be recorded in a log that is kept in a readily accessible location: 1) A list of identification numbers for equipment subject to the requirements of Subpart VVa; 2) (i) A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of 40 CFR 60.482-2a(e), 60.482-3a(i) and 60.482-7a(f). (ii) The designation of equipment as subject to the requirements of 40 CFR 60.482-2a(e), 60.482-3a(i) and 60.482-7a(f) shall be signed by the owner or operator; 3) A list of equipment identification numbers for pressure relief devices required to comply with ¹ 60.482-4a; 4) (i) The dates of each compliance test as required in 40 CFR 60.482-2a(e), 60.482-3a(i), ¹ 60.482-4a, and 60.482-7a(f). (ii) The background level measured during each compliance test. (iii) The maximum instrument reading measured at the equipment during each compliance test; and 5) A list of identification numbers for equipment in vacuum service. [40 CFR 60.486a(e)]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

88. The following information pertaining to all valves subject to the requirements of 40 CFR 60.482-7a(g) and (h) and to all pumps subject to the requirements of 40 CFR 60.482-2a(g) shall be recorded in a log that is kept in a readily accessible location: 1) A list of identification numbers for valves and pumps that are designated as unsafe-to-monitor, an explanation for each valve or pump stating why the valve or pump is unsafe-to-monitor, and the plan for monitoring each valve or pump; and 2) A list of identification numbers for valves that are designated as difficult-to-monitor, an explanation for each valve stating why the valve is difficult-to-monitor, and the schedule for monitoring each valve. [40 CFR 60.486a(f)]
89. The following information shall be recorded for valves complying with 40 CFR 60.483-2a: 1) A schedule of monitoring; 2) The percent of valves found leaking during each monitoring period. [40 CFR 60.486a(g)]
90. The following information shall be recorded in a log that is kept in a readily accessible location: 1) Design criterion required in 40 CFR 60.482-2a(d)(5) and 60.482-3a(e)(2) and explanation of the design criterion; and 2) Any changes to this criterion and the reasons for the changes. [40 CFR 60.486a(h)]
91. The following information shall be recorded in a log that is kept in a readily accessible location for use in determining exemptions as provided in 40 CFR 60.480a(d): 1) An analysis demonstrating the design capacity of the affected facility; 2) A statement listing the feed or raw materials and products from the affected facilities and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol; and 3) An analysis demonstrating that equipment is not in VOC service. [40 CFR 60.486a(i)]
92. Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location. [40 CFR 60.486a(j)]
93. The provisions of 40 CFR 60.7 (b) and (d) do not apply to affected facilities subject to Subpart VVa. [40 CFR 60.486a(k)]
94. All semiannual reports to the Administrator shall include the following information, summarized from the information in 40 CFR 60.486a: 1) Process unit identification; 2) For each month during the semiannual reporting period, i) Number of valves for which leaks were detected as described in 40 CFR 60.482-7a(b) or 40 CFR 60.483-2a, (ii) Number of valves for which leaks were not repaired as required in 40 CFR 60.482-7a(d)(1), (iii) Number of pumps for which leaks were detected as described in 40 CFR 60.482-2a(b) and (d)(6)(i), (iv) Number of pumps for which leaks were not repaired as required in 40 CFR 60.482-2a(c)(1) and (d)(6)(ii), (v) Number of compressors for which leaks were detected as described in 40 CFR 60.482-3a(f), (vi) Number of compressors for which leaks were not repaired as required in 40 CFR 60.482-3a(g)(1), and (vii) The facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible; 3) Dates of process unit shutdowns which occurred within the semiannual reporting period; 4) Revisions to items reported in the semiannual report if changes have occurred since the initial report, as required in 40 CFR 60.487a(a) and (b), or subsequent revisions to the initial report. [40 CFR 60.487a(c)]
95. An owner or operator electing to comply with the provisions of 40 CFR 60.483-1a and 60.483-2a shall notify the Administrator of the alternative standard selected 90 days before implementing either of the provisions. [40 CFR 60.487a(d)]
96. The semiannual reporting requirements of 40 CFR 60.487a(a), (b), and (c) remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such State. In that event, affected sources within the State will be relieved of the obligation to comply with the requirements of 40 CFR 60.487a(a), (b), and (c), provided that they comply with the requirements established by the State. [40 CFR 60.487a(f)]
97. Operator shall notify the Administrator of the actual date of initial startup postmarked within 15 days after such date. [40 CFR 60.7 (a)(3)]
98. Operator shall notify the Administrator of the date construction is commenced postmarked no later than 30 days after such date. Notification shall include the Operating Plan. [40 CFR 60.113b(c)(1) and 60.7 (a)(1)]
99. Permittee shall comply with all notification and recordkeeping requirements of 40 CFR Part 60.7. [40 CFR 60.7]
100. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated as required by this permit. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

101. All records required by Rule 4455 shall be retained for a minimum period of 5 years and shall be made available to the APCO, ARB and US EPA upon request. [District Rule 4455]

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

ATTACHMENT II
Emissions Calculations

Crimson Renewable Energy
 Permit S-6971-11-1
 Revised Biodiesel Production Operation

Fugitive Emissions Using Average Emission Factors

EPA Protocol for Equipment Leak Emission Estimate
 Table 2-1. *SOCMI AVERAGE EMISSION FACTORS*

With Hazardous Organic NESHAP (HON) Leak Detection and Repair Program (LDAR) Control Efficiency from Tables 5-1 and 5-2

Equipment Type	Service	Screening Value (kg/hr/source)	EF - TOC (lb/day/source)	Component Count	HON-LDAR Control Efficiency (%)	VOC emissions (lb/day)
Valves	Gas	0.00597	0.31588	125	92	3.16
	Light Liquid	0.00403	0.21323	503	88	12.87
	Heavy Liquid	0.00023	0.01217	0	88	0.00
Pump Seals	Light Liquid	0.01990	1.05293	25	75	6.58
	Heavy Liquid	0.00862	0.45609	0	75	0.00
Compressor Seals	Gas	0.22800	12.06369	3	75	9.00
PRVs	Gas	0.10400	5.50274	6	92	2.64
Connectors	All	0.00183	0.09683	1,421	93	9.63
Open-ended Lines	All	0.00170	0.08995	0	0	0.00
Sampling Connections	All	0.01500	0.79366	0	100	0.00

Total Fugitive Component VOC Emissions = 43.9 lb/day

§60.482-5a(a) requires a closed-loop capture and purge system, which is assumed 100% control

HON requires use of double valves or caps on all open-ended lines

= **16,017 lb/year**

Crimson Renewable Energy

Permit S-6971-16-0

142.8 K-Gal Biodiesel Settling Tank w/ TVR (PF-4)

Fugitive Emissions Using Average Emission Factors

EPA Protocol for Equipment Leak Emission Estimate

Table 2-1. SOCM I AVERAGE EMISSION FACTORS

With Hazardous Organic NESHAP (HON) Leak Detection and Repair Program (LDAR) Control Efficiency from Tables 5-1 and 5-2

Equipment Type	Service	Screening Value (kg/hr/source)	EF - TOC (lb/day/source)	Component Count	HON-LDAR Control Efficiency (%)	VOC emissions (lb/day)
Valves	Gas	0.00597	0.31588	0	92	0.00
	Light Liquid	0.00403	0.21323	17	88	0.43
	Heavy Liquid	0.00023	0.01217	0	88	0.00
Pump Seals	Light Liquid	0.01990	1.05293	0	75	0.00
	Heavy Liquid	0.00862	0.45609	0	75	0.00
Compressor Seals	Gas	0.22800	12.06369	0	75	0.00
PRVs	Gas	0.10400	5.50274	0	92	0.00
Connectors	All	0.00183	0.09683	73	93	0.49
Open-ended Lines	All	0.00170	0.08995	0	0	0.00
Sampling Connections	All	0.01500	0.79366	0	100	0.00

Total Fugitive Component VOC Emissions = 0.9 lb/day

§60.482-5a(a) requires a closed-loop capture and purge system, which is assumed 100% control

HON requires use of double valves or caps on all open-ended lines

= 339 lb/year

Crimson Renewable Energy

Permit S-6971-17-0

4.0 K-Gal Glycerin Settling Tank w/TVR (V-560)

Fugitive Emissions Using Average Emission Factors

EPA Protocol for Equipment Leak Emission Estimate

Table 2-1. SOCMI AVERAGE EMISSION FACTORS

With Hazardous Organic NESHAP (HON) Leak Detection and Repair Program (LDAR) Control Efficiency from Tables 5-1 and 5-2

Equipment Type	Service	Screening Value EF - TOC		Component Count	HON-LDAR Control Efficiency (%)	VOC emissions (lb/day)
		(kg/hr/source)	(lb/day/source)			
Valves	Gas	0.00597	0.31588	0	92	0.00
	Light Liquid	0.00403	0.21323	19	88	0.49
	Heavy Liquid	0.00023	0.01217	0	88	0.00
Pump Seals	Light Liquid	0.01990	1.05293	2	75	0.53
	Heavy Liquid	0.00862	0.45609	0	75	0.00
Compressor Seals	Gas	0.22800	12.06369	0	75	0.00
PRVs	Gas	0.10400	5.50274	0	92	0.00
Connectors	All	0.00183	0.09683	29	93	0.20
Open-ended Lines	All	0.00170	0.08995	0	0	0.00
Sampling Connections	All	0.01500	0.79366	0	100	0.00

Total Fugitive Component VOC Emissions = 1.2 lb/day

§60.482-5a(a) requires a closed-loop capture and purge system, which is assumed 100% control

HON requires use of double valves or caps on all open-ended lines

= 441 lb/year

Crimson Renewable Energy

Permit S-6971-18-0

2.5 K-Gal Oil Separation Tank w/ TVR (V-401)

Fugitive Emissions Using Average Emission Factors

EPA Protocol for Equipment Leak Emission Estimate

Table 2-1. SOCM I AVERAGE EMISSION FACTORS

With Hazardous Organic NESHAP (HON) Leak Detection and Repair Program (LDAR) Control Efficiency from Tables 5-1 and 5-2

Equipment Type	Service	Screening Value EF - TOC		Component Count	HON-LDAR Control Efficiency (%)	VOC emissions (lb/day)
		(kg/hr/source)	(lb/day/source)			
Valves	Gas	0.00597	0.31588	4	92	0.10
	Light Liquid	0.00403	0.21323	37	88	0.95
	Heavy Liquid	0.00023	0.01217	0	88	0.00
Pump Seals	Light Liquid	0.01990	1.05293	0	75	0.00
	Heavy Liquid	0.00862	0.45609	0	75	0.00
Compressor Seals	Gas	0.22800	12.06369	0	75	0.00
PRVs	Gas	0.10400	5.50274	0	92	0.00
Connectors	All	0.00183	0.09683	73	93	0.49
Open-ended Lines	All	0.00170	0.08995	0	0	0.00
Sampling Connections	All	0.01500	0.79366	0	100	0.00

Total Fugitive Component VOC Emissions = 1.5 lb/day

§60.482-5a(a) requires a closed-loop capture and purge system, which is assumed 100% control

HON requires use of double valves or caps on all open-ended lines

= 563 lb/year

Crimson Renewable Energy

Permit S-6971-19-0

15.0 K-Gal Post TE Surge Tank w/ TVR (V-360)

Fugitive Emissions Using Average Emission Factors

EPA Protocol for Equipment Leak Emission Estimate

Table 2-1. *SOCMI AVERAGE EMISSION FACTORS*

With Hazardous Organic NESHAP (HON) Leak Detection and Repair Program (LDAR) Control Efficiency from Tables 5-1 and 5-2

Equipment Type	Service	Screening Value (kg/hr/source)	EF - TOC (lb/day/source)	Component Count	HON-LDAR Control Efficiency (%)	VOC emissions (lb/day)
Valves	Gas	0.00597	0.31588	0	92	0.00
	Light Liquid	0.00403	0.21323	18	88	0.46
	Heavy Liquid	0.00023	0.01217	0	88	0.00
Pump Seals	Light Liquid	0.01990	1.05293	2	75	0.53
	Heavy Liquid	0.00862	0.45609	0	75	0.00
Compressor Seals	Gas	0.22800	12.06369	0	75	0.00
PRVs	Gas	0.10400	5.50274	0	92	0.00
Connectors	All	0.00183	0.09683	55	93	0.37
Open-ended Lines	All	0.00170	0.08995	0	0	0.00
Sampling Connections	All	0.01500	0.79366	0	100	0.00

Total Fugitive Component VOC Emissions = 1.4 lb/day

§60.482-5a(a) requires a closed-loop capture and purge system, which is assumed 100% control

HON requires use of double valves or caps on all open-ended lines

= **496 lb/year**

Crimson Renewable Energy

Permit S-6971-20-0

6.0 K-Gal Neutralization Tank w/ TVR (V-460)

Fugitive Emissions Using Average Emission Factors

EPA Protocol for Equipment Leak Emission Estimate

Table 2-1. SOCMI AVERAGE EMISSION FACTORS

With Hazardous Organic NESHAP (HON) Leak Detection and Repair Program (LDAR) Control Efficiency from Tables 5-1 and 5-2

Equipment Type	Service	Screening Value EF - TOC		Component Count	HON-LDAR Control Efficiency (%)	VOC emissions (lb/day)
		(kg/hr/source)	(lb/day/source)			
Valves	Gas	0.00597	0.31588	10	92	0.25
	Light Liquid	0.00403	0.21323	11	88	0.28
	Heavy Liquid	0.00023	0.01217	0	88	0.00
Pump Seals	Light Liquid	0.01990	1.05293	1	75	0.26
	Heavy Liquid	0.00862	0.45609	0	75	0.00
Compressor Seals	Gas	0.22800	12.06369	1	75	3.02
PRVs	Gas	0.10400	5.50274	0	92	0.00
Connectors	All	0.00183	0.09683	41	93	0.28
Open-ended Lines	All	0.00170	0.08995	0	0	0.00
Sampling Connections	All	0.01500	0.79366	0	100	0.00

Total Fugitive Component VOC Emissions = 4.1 lb/day

§60.482-5a(a) requires a closed-loop capture and purge system, which is assumed 100% control

HON requires use of double valves or caps on all open-ended lines

= 1,493 lb/year

Crimson Renewable Energy

Permit S-6971-21-0

6.0 K-Gal Neutralization Tank w/ TVR (V-470)

Fugitive Emissions Using Average Emission Factors

EPA Protocol for Equipment Leak Emission Estimate

Table 2-1. SOCFI AVERAGE EMISSION FACTORS

With Hazardous Organic NESHAP (HON) Leak Detection and Repair Program (LDAR) Control Efficiency from Tables 5-1 and 5-2

Equipment Type	Service	Screening Value EF – TOC		Component Count	HON-LDAR Control Efficiency (%)	VOC emissions (lb/day)
		(kg/hr/source)	(lb/day/source)			
Valves	Gas	0.00597	0.31588	23	92	0.58
	Light Liquid	0.00403	0.21323	0	88	0.00
	Heavy Liquid	0.00023	0.01217	0	88	0.00
Pump Seals	Light Liquid	0.01990	1.05293	2	75	0.53
	Heavy Liquid	0.00862	0.45609	0	75	0.00
Compressor Seals	Gas	0.22800	12.06369	1	75	3.02
PRVs	Gas	0.10400	5.50274	0	92	0.00
Connectors	All	0.00183	0.09683	75	93	0.51
Open-ended Lines	All	0.00170	0.08995	0	0	0.00
Sampling Connections	All	0.01500	0.79366	0	100	0.00

Total Fugitive Component VOC Emissions = 4.6 lb/day

§60.482-5a(a) requires a closed-loop capture and purge system, which is assumed 100% control

HON requires use of double valves or caps on all open-ended lines

= 1,691 lb/year

ATTACHMENT III
Emissions Profiles

Permit #: S-6971-1-4	Last Updated
Facility: CRIMSON RENEWABLE ENERGY, LP	01/15/2014 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	3299.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	9.3
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-6971-11-1	Last Updated
Facility: CRIMSON RENEWABLE ENERGY, LP	02/06/2014 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	16017.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	43.9
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	2042.0
Q2:	0.0	0.0	0.0	0.0	2042.0
Q3:	0.0	0.0	0.0	0.0	2042.0
Q4:	0.0	0.0	0.0	0.0	2043.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					1.5
Quarterly Offset Amounts (lb/Qtr)					
Q1:					3612.0
Q2:					3612.0
Q3:					3612.0
Q4:					3612.0

Permit #: S-6971-16-0	Last Updated
Facility: CRIMSON RENEWABLE ENERGY, LP	02/06/2014 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	339.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.9
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	84.0
Q2:	0.0	0.0	0.0	0.0	85.0
Q3:	0.0	0.0	0.0	0.0	85.0
Q4:	0.0	0.0	0.0	0.0	85.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-6971-17-0	Last Updated
Facility: CRIMSON RENEWABLE ENERGY, LP	02/06/2014 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	441.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	1.2
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	110.0
Q2:	0.0	0.0	0.0	0.0	110.0
Q3:	0.0	0.0	0.0	0.0	110.0
Q4:	0.0	0.0	0.0	0.0	111.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-6971-18-0	Last Updated
Facility: CRIMSON RENEWABLE ENERGY, LP	02/06/2014 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	563.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	1.5
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	140.0
Q2:	0.0	0.0	0.0	0.0	141.0
Q3:	0.0	0.0	0.0	0.0	141.0
Q4:	0.0	0.0	0.0	0.0	141.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-6971-19-0	Last Updated
Facility: CRIMSON RENEWABLE ENERGY, LP	02/06/2014 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	496.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	1.4
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	124.0
Q2:	0.0	0.0	0.0	0.0	124.0
Q3:	0.0	0.0	0.0	0.0	124.0
Q4:	0.0	0.0	0.0	0.0	124.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-6971-20-0	Last Updated
Facility: CRIMSON RENEWABLE ENERGY, LP	02/06/2014 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	1493.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	4.1
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	373.0
Q2:	0.0	0.0	0.0	0.0	373.0
Q3:	0.0	0.0	0.0	0.0	373.0
Q4:	0.0	0.0	0.0	0.0	374.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-6971-21-0	Last Updated
Facility: CRIMSON RENEWABLE ENERGY, LP	02/06/2014 EDGEHILR

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	1691.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	4.6
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	422.0
Q2:	0.0	0.0	0.0	0.0	423.0
Q3:	0.0	0.0	0.0	0.0	423.0
Q4:	0.0	0.0	0.0	0.0	423.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

ATTACHMENT IV
SSPE1 Calculation

Permit	Description	NOx	SOx	PM-10	CO	VOC
S-6971-0-0	Facility-Wide Reqs					
S-6971-1-3	Methanol Unloading & 3400 BBL Tank & TVR	0	0	0	0	3,299
S-6971-5-0	20 K-Gal Sodium Methylate Tank	0	0	0	0	416
S-6971-6-2	7.7 MMBtu/Hr	742	192	155	2,496	364
S-6971-7-2	7.7 MMBtu/Hr	742	192	155	2,496	364
S-6971-8-0	20 K-Gal Sodium Methylate Tank	0	0	0	0	183
S-6971-9-0	10.5 K-Gal Sulfuric Acid Tank w/ Water Trap Filter	0	0	0	0	0
S-6971-10-0	10.5 K-Gal Citric Acid Tank w/ Water Trap Filter	0	0	0	0	0
S-6971-11-0	Biodiesel Production Operation	0	0	0	0	7,843
S-6971-12-1	Water Treatment Process with Carbon Canister	0	0	0	0	2,423
S-6971-13-1	80-hp 1,600 GPM Cooling Tower	0	0	14,027	0	0
S-6971-14-0	80-hp 1,600 GPM Cooling Tower	0	0	14,027	0	0
S-6971-15-0	32.7 MMBtu/Hr Cleaver Brooks W/ SCR	2,292	816	659	10,599	1,547

SSPE1 Summary of All Projects (lb/yr): 3,776 1,201 29,024 15,590 16,439
NOx SOx PM-10 CO VOC

MAJOR SOURCE SSPE1 (lb/yr): 3,776 1,201 29,024 15,590 16,439
NOx SOx PM-10 CO VOC

Major Source Threshold (lb/yr): 20,000 54,750 29,200 200,000 20,000

ATTACHMENT V
BACT Guidelines

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 4.12.1*

Last Update 11/26/2006

Chemical Plants - Valves & Connectors

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	Leak defined as a reading of methane in excess of 100 ppmv above background when measured per EPA Method 21 and Maintenance Program pursuant to District Rule 4455		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source**

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 4.12.2*

Last Update 11/27/2006

Chemical Plants Pump and Compressor Seals

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	Leak defined as a reading of methane in excess of 500 ppmv above background when measure per EPA Method 21 and an Inspection and Maintenance Program pursuant to District Rule 4455		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source**

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 7.3.1*

Last Update 10/1/2002

**Petroleum and Petrochemical Production - Fixed Roof Organic
Liquid Storage or Processing Tank, < 5,000 bbl Tank capacity ****

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	PV-vent set to within 10% of maximum allowable pressure	99% control (Waste gas incinerated in steam generator, heater treater, or other fired equipment and inspection and maintenance program; transfer of noncondensable vapors to gas pipeline; reinjection to formation (if appropriate wells are available); or equal).	

** Converted from Determinations 7.1.11 (10/01/02).

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source**

ATTACHMENT VI BACT Analysis

S-6971-11 Fugitive Emissions – Valves and Connectors

Top-Down Analysis for VOC Emissions

Facility fugitive emissions are included on this permit unit. For the facility fugitive emissions from valves and connectors the applicable BACT requirements guideline is: BACT Clearinghouse Guideline 4.12.1 (Current Version), Chemical Plants – Valves & Connectors

Step 1 - Identify All Possible Control Technologies

Leak defined as a reading of methane, in excess of 100 ppmv above background when measured at a distance of one (1) cm from the potential source and an Inspection and Maintenance Program pursuant to District Rule 4455.

Step 2 - Eliminate Technologically Infeasible Options

There is no technologically infeasible option.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

Leak defined as a reading of methane, in excess of 100 ppmv above background when measured at a distance of one (1) cm from the potential source and an Inspection and Maintenance Program pursuant to District Rule 4455.

Step 4 - Cost Effectiveness Analysis

Since the applicant has chosen the most effective control technology listed in step 3 as a technologically feasible option; a cost effectiveness analysis is not required.

Step 5 - Select BACT

Leak defined as a reading of methane, in excess of 100 ppmv above background when measured at a distance of one (1) cm from the potential source and an Inspection and Maintenance Program pursuant to District Rule 4455.

S-6971-11 Fugitive Emissions – Pump and Compressor Seals

Facility fugitive emissions are included on this permit unit. For the facility fugitive emissions from pumps and compressor seals the applicable BACT requirements guideline is: BACT Clearinghouse (Current Version) Guideline is 4.12.2 Chemical Plants Pump and Compressor Seals

Top-Down Analysis for VOC Emissions

Step 1 - Identify All Possible Control Technologies

Leak defined as a reading of methane, in excess of 500 ppmv above background and an Inspection and Maintenance Program pursuant to District Rule 4455.

Step 2 - Eliminate Technologically Infeasible Options

There is no technologically infeasible option.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

Leak defined as a reading of methane, in excess of 500 ppmv above background when measured at a distance of one (1) cm from the potential source and an Inspection and Maintenance Program pursuant to District Rule 4455.

Step 4 - Cost Effectiveness Analysis

Since the applicant has chosen the most effective control technology listed in step 3 as a technologically feasible option; a cost effectiveness analysis is not required.

Step 5 - Select BACT

Leak defined as a reading of methane, in excess of 500 ppmv above background and an Inspection and Maintenance Program pursuant to District Rule 4455.

S-6971-16, 20, and ‘-21-Process Vessels

Pursuant to the District's BACT policy APR-1305, BACT determinations shall be based on the control technologies and methods for the same or similar stationary source categories listed in the District's BACT Clearinghouse. BACT Guideline 7.3.2 identifies BACT for a fixed-roof organic liquid storage or processing tank, with a rated capacity equal to or greater than 5,000 bbl.

This guideline shall be the basis for a “top-down” BACT analysis per District Policy. The following BACT performance levels for VOC are identified by guideline 7.3.1:

District BACT Guideline 7.3.1 (Current)

	Achieved in Practice BACT	Technologically Feasible BACT	Alternate Basic Equipment**
VOC	PV-vent set to within 10% of maximum allowable pressure.	99% control; thermal or catalytic oxidizer; carbon adsorption; or equal).	None Identified

BACT Analysis for VOC:

VOC emissions are generated from standing and working losses resulting from the handling and storage of methanol.

Step 1 – Identify All Control Technologies

Achieved in Practice:

PV-vent set to within 10% of maximum allowable pressure.

Technologically feasible:

99% control; thermal or catalytic oxidizer; carbon adsorption; or equal).

Step 2 – Eliminate Technologically Infeasible Options

All of the above technologies are technologically feasible.

Step 3 – Rank Remaining Control Technologies by Control Effectiveness

1. 99% control; thermal or catalytic oxidizer; carbon adsorption; or equal.
2. PV-vent set to within 10% of maximum allowable pressure is not technologically infeasible.

Step 4 - Cost Effectiveness Analysis

The highest ranked control identified (99% vapor control) is proposed. A cost effectiveness analysis is not required.

Step 5 - Select BACT

Tanks are served by vapor control system with a control efficiency of 99% .
Therefore BACT has been satisfied.

ATTACHMENT VII
HRA

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Richard Edgehill – Permit Services
 From: Kyle Melching – Technical Services
 Date: January 21, 2014
 Facility Name: Crimson Renewable Energy LP
 Location: 17731 Millux Rd., Bakersfield
 Application #(s): S-6971-1-4, 11-1, & 16-0 thru 21-0
 Project #: S-1134522

A. RMR SUMMARY

RMR Summary			
Categories	Biodiesel Operation w/ Tanks (Unit 11-1, 16-0 thru 21-0)	Project Totals	Facility Totals
Prioritization Score	0.09*	0.09	< 1.0
Acute Hazard Index	N/A	N/A	N/A
Chronic Hazard Index	N/A	N/A	N/A
Maximum Individual Cancer Risk (10 ⁻⁶)	N/A	N/A	N/A
T-BACT Required?	No		
Special Permit Conditions?	No		

*Prioritization for this project was less than 1.0; no further analysis is required.

Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

Units # 11-1, 16-0 thru 21-0

No special conditions are required.

B. RMR REPORT

I. Project Description

Technical Services received a request on January 15, 2014, to perform an Ambient Air Quality Analysis (AAQA) and a Risk Management Review for the proposed installation of six process vessels. The vessels are existing and associated with biodiesel production process S-6971-11. Applicant was requested by District Compliance Division to obtain a separate permit for each tank as they are connected to the existing vapor control system listed on permit S-6971-1. Post-project fugitive emissions (PE2) for S-6971-11 were recalculated in this project and are higher than Pre-project emissions (PE1). With the increase in emissions, the source becomes a new Major Source for VOCs.

II. Analysis

Toxic emissions for these proposed units were calculated using emission rates provided by the project engineer. Emissions were assumed to be methanol as a worst case as per project engineer. In accordance with the District's *Risk Management Policy for Permitting New and Modified Sources* (APR 1905, March 2, 2001), risks from the proposed unit's toxic emissions were prioritized using the procedure in the 1990 CAPCOA Facility Prioritization Guidelines and incorporated in the District's HEARTs database. The prioritization score for this proposed unit was less than 1.0 (see RMR Summary Table). Therefore, no further analysis was necessary.

The following parameters were used for the review:

Analysis Parameters (Units 11-1, 16-0 thru 21-0)			
Type of Closest Receptor	Business	Closest Receptor (m)	15
Methanol Emission Unit 11-1 (Lb/hr)	0.93	Methanol Emission Unit 11-1 (Lb/yr)	8176
Methanol Emission Unit 16-0 (Lb/hr)	0.18	Methanol Emission Unit 16-0 (Lb/yr)	1584
Methanol Emission Unit 17-0 (Lb/hr)	0.054	Methanol Emission Unit 17-0 (Lb/yr)	457
Methanol Emission Unit 18-0 (Lb/hr)	0.067	Methanol Emission Unit 18-0 (Lb/yr)	569
Methanol Emission Unit 19-0 (Lb/hr)	0.058	Methanol Emission Unit 19-0 (Lb/yr)	512
Methanol Emission Unit 20-0 (Lb/hr)	0.183	Methanol Emission Unit 20-0 (Lb/yr)	1611
Methanol Emission Unit 21-0 (Lb/hr)	0.21	Methanol Emission Unit 21-0 (Lb/yr)	1820

An AAQA was not performed since the processing engineer indicated only an increase in VOCs for this project. AAQA's only require modeling for criteria pollutants NOx, CO, SOx, PM₁₀, and PM_{2.5}

III. Conclusion

The prioritization score is less than 1.0. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

IV. Attachments

- A. RMR request from the project engineer
- B. Additional information from the applicant/project engineer
- C. Prioritization score w/ toxic emissions summary
- D. Facility Summary

ATTACHMENT VIII
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-6971-1-4

LEGAL OWNER OR OPERATOR: CRIMSON RENEWABLE ENERGY, LP
MAILING ADDRESS: 950 17TH ST - STE 2650
DENVER, CO 80202

LOCATION: 17731 MILLUX RD
BAKERSFIELD, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF 142,500 GALLON FIXED ROOF METHANOL STORAGE TANK AND ACCOMPANYING UNLOADING OPERATION, SERVED BY A SHARED GAS BLANKETING/VAPOR CONTROL SYSTEM SHARED WITH S-6971-5 AND '8 DISCHARGING TO VAPOR SURGE VESSEL (VRT-110) AND VAPOR INCINERATOR LISTED ON S-1388-12: IDENTIFY PERMITS S-6971-16 THROUGH -21 AS SERVED BY THE VAPOR CONTROL SYSTEM

CONDITIONS

1. Facility will have up to 12 months from the date of ATC issuance to either submit a Title V Application or comply with District Rule 2530 Federally Enforceable Potential to Emit. [District Rules 2520 and 2530]
2. {1407} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. For this Class 1 organic liquid transfer facility, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. [District Rule 4624]
5. All liquids and gases from the transfer operation shall be routed to one of the following systems: a vapor collection and control system; a fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); a floating roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or a closed VOC emission control system. [District Rules 4623 and 4624]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

S-6971-1-4: Jan 22 2014 3:02PM - EDGEHILL : Joint Inspection NOT Required

6. The operator of an organic liquid transfer facility 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 test method prescribed in Section 6.3.8 of Rule 4624. [District Rule 4624]
7. 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 the inspections required under provisions of Sections 5.9.1 and 5.9.2 of Rule 4624 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency shall revert back to quarterly and the operator shall contact the APCO in writing within 14 days. [District Rule 4624]
8. 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 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]
9. Operator shall keep records of the throughputs of materials transferred and the results of any required leak inspections. [District Rules 4455 and 4624]
10. The methanol tank shall be equipped with a gas blanketing/vapor control system consisting of a closed vent system that collects all VOCs from the storage tank, and discharges only to vapor surge vessel (VRT-110) or the vapor incinerator listed on permit S-1388-12. Vapor incinerator listed on S-1388-12 shall be operated to reduce VOC emissions by 95% or greater. The gas blanketing/vapor control system shall not have any gas leaks in excess of 10,000 ppmv above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623. [District Rules 2201 and 4623 and 40 CFR 60.112b(a)(3)(ii)]
11. Upon detection of any leak >10,000 ppmv above background, the operator shall eliminate the leak within 8 hours after detection, or if the leak can not be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices and eliminate the leak within 48 hours after minimization. In no event shall the total time to eliminate the leak exceed 56 hours after detection. [District Rule 2201 and 4623 and 40 CFR 60.112b(a)(3)(i)]
12. If any of the tank or gas blanketing/vapor control system components are found with detectable leaks >100 ppmv and < 10,000 ppmv above background for valves and connectors and >500 ppmv and < 10,000 ppmv above background for pump and compressor seals, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 and 40 CFR 60.112b(a)(3)(i)]
13. Storage tank or gas blanketing/vapor control system components with detectable leaks >100 ppmv and < 10,000 ppmv above background for valves and connectors and >500 ppmv and < 10,000 ppmv above background for pump and compressor seals shall be repaired pursuant to the requirements and schedule established in Rule 4455. [District Rule 2201 and 40 CFR 60.112b(a)(3)(i)]
14. Except for spillage emissions resulting from liquid line disconnections, VOC emission rate from unloading operations and methanol storage tank shall not exceed 9.0 lb/day based on component count and emission factors from EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCOMI Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals, 93% connectors, 0% open ended lines, and 92% pressure relief valves). Permittee shall maintain with the permit an accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using above specified leak rates and control efficiencies. [District Rule 2201]
15. Total VOC emissions from liquid line disconnections during unloading shall not exceed 0.3 lb/day and 14 lb/year. [District Rule 2201]
16. Maximum number of liquid line disconnections shall not exceed 18/day and 823/year. [District Rule 2201]
17. The maximum volume of methanol spilled during each disconnection shall not exceed 10 milliliters. [District Rule 2201]

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CONDITIONS CONTINUE ON NEXT PAGE

18. All piping, fittings, and valves directly affixed to the tank or associated with the tank gas blanketing/vapor control system shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the provisions of this permit. [District Rules 2201, 4623 and 40 CFR 60.112b(a)(3)(i)]
19. If a component type for a given tank is found to leak at a rate >10,000 ppmv above background during an annual inspection, then quarterly inspections of that component type on the tank or system shall be conducted for four consecutive quarters. After four successful quarterly inspections in which the component type is found to leak less than 10,000 ppmv, inspections interval may revert to annual. [District Rule 2201 and 4623 and 40 CFR 60.112b(a)(3)(i)]
20. The operator shall keep a copy of an APCO-approved fugitive component Operator Management Plan (OMP) at the facility. The plan shall conform to the requirements set forth in Rule 4455 and shall be made available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved OMP. [District Rules 2201, 4455 and 4623 and 40 CFR 60.113b(c)(1)(i) and (ii) and 40 CFR 60.115b(c)(1)]
21. In accordance with the approved OMP, the operator shall meet all applicable operating, inspection and re-inspection, maintenance, process pressure relief device (PRD), component identification, recordkeeping and notification requirements of Rule 4455 for all components containing or contacting VOC at the this gas liquids processing facility, except for those components specifically exempted in Sections 4.1 and 4.2. [District Rules 2201 and 4455 and 40 CFR 60.113b(c)(1)(i) and (ii)]
22. Operator shall notify the Administrator of the actual date of initial startup postmarked within 15 days after such date. [40 CFR 60.7 (a)(3)]
23. Operator shall notify the Administrator of the date construction is commenced postmarked no later than 30 days after such date. Notification shall include the Operating Plan. [40 CFR 60.113b(c)(1) and 60.7 (a)(1)]
24. Permittee shall comply with all notification and recordkeeping requirements of 40 CFR Part 60.7. [40 CFR 60.7]
25. Daily and annual records shall be kept of the number of unloading rack disconnects. [District Rule 2201]
26. All records required by this permit shall be retained for a minimum period of 5 years and shall be made available to the APCO, ARB and US EPA upon request. [District Rule 2201 and 4623 and CFR 60.115b(c)(2)]
27. ATC shall be implemented concurrently with ATCs S-6971-11-1 and 16-0 through '-21-0. [District Rule 2201]

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
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PERMIT NO: S-6971-11-1

LEGAL OWNER OR OPERATOR: CRIMSON RENEWABLE ENERGY, LP
MAILING ADDRESS: 950 17TH ST - STE 2650
DENVER, CO 80202

LOCATION: 17731 MILLUX RD
BAKERSFIELD, CA

EQUIPMENT DESCRIPTION:

MODIFICATION OF BIODIESEL PRODUCTION OPERATION INCLUDING HFFA PRETREATMENT, TRANSESTERIFICATION, WASH WATER AND REMOVAL, GLYCERIN RECOVERY, AND METHANOL RECOVERY SKIDS, NITROGEN BLANKET/VAPOR CONTROL SYSTEM VENTED TO S-6971-1 VAPOR CONTROL SYSTEM: REMOVE SIX PROCESS VESSELS FROM EQUIPMENT DESCRIPTION AND PERMIT AS SEPARATE PERMIT UNITS, CORRECT COMPONENTS COUNTS

CONDITIONS

1. Facility will have up to 12 months from the date of ATC issuance to either submit a Title V Application or comply with District Rule 2530 Federally Enforceable Potential to Emit. [District Rules 2520 and 2530]
2. This permit includes the following permit exempt process equipment: loading operations for, and tank storage of biodiesel and glycerol; unloading operations for, and tank storage of vegetable oils and glycerol. [District Rule 2020]
3. VOC emission rate from this unit shall not exceed 43.9 lb/day based on component count and emission factors from EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCFI Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals (100% if seal-less compressors), 93% connectors, 100% open ended lines, 92% pressure relief valves, 100% sampling connectors). [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

S-6971-11-1, Feb 6 2014 10:16AM - EDGHEILR Joint Inspection NOT Required

4. A component shall be considered leaking if one or more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of Rule 4455 exist at the facility. For this permit unit, except for pumps and compressors, a minor gas leak shall be defined for any component listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service as a reading in excess of 100 ppmv above background up to and including a reading of 10,000 ppmv above background. For pumps, compressors and other component types not specifically listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service, a minor gas leak shall be defined as a reading in excess of 500 ppmv above background up to and including a reading of 10,000 ppmv above background. Readings shall be taken as methane using a portable hydrocarbon detection instrument and shall be made in accordance with the methods specified in Section 6.4.1 of Rule 4455. [District NSR Rule and Rule 4455, 5.1.4]
5. The operator shall not use any component that leaks in excess of the allowable leak standards of Rule 4455, or is found to be in violation of the provisions specified in Section 5.1.3. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the rule. [District Rule 4455, 5.1.1]
6. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2]
7. The operator shall be in violation of Rule 4455 if any District inspection demonstrates that one or more of the conditions in Sections 5.1.4 exist at the facility. [District Rule 4455, 5.1.3.1]
8. Except for annual operator inspection described in Section 5.1.3.2.3, any operator inspection that demonstrates that one or more of the conditions in Section 5.1.4 exist at the facility shall not constitute a violation of Rule 4455 if the leaking components are repaired as soon as practicable but not later than the time frame specified in Rule 4455. Such components shall not be counted towards determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.1]
9. Leaking components detected during operator inspection pursuant Section 5.1.3.2.1 that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in Rule 4455 shall be counted toward determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.2]
10. Any operator inspection conducted annually for a component type (including operator annual inspections pursuant to Section 5.2.5, 5.2.6, 5.2.7, or 5.2.8) that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall constitute a violation of Rule 4455 regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in Rule 4455. [District Rule 4455, 5.1.3.2.3]
11. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and Pressure Relief Devices (PRDs) in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be reinspected within 24 hours using a portable analyzer. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3. [District Rule 4455, 5.2.1 & 5.2.2]
12. The operator shall inspect all components at least once every calendar quarter, except for inaccessible components, unsafe-to-monitor components and pipes. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5, 5.2.6, and 5.2.7. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. Components shall be inspected using EPA Method 21. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6 & 5.2.7]
13. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs which shall continue to be inspected on a quarterly basis. [District Rule 4455, 5.2.8]

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14. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of Rule 4455 during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five (5) calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 & 5.2.10]
15. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11]
16. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12]
17. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag that contains the information specified in Section 5.3.3. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected using EPA Method 21; and is found to be in compliance with the requirements of Rule 4455. [District Rule 4455, 5.3.1 5.3.2 and 5.3.3]
18. An operator shall minimize all component leaks immediately to the extent possible, but not later than one (1) hour after detection of leaks in order to stop or reduce leakage to the atmosphere. [District Rule 4455, 5.3.4]
19. If the leak has been minimized but the leak still exceeds the applicable leak standards of Rule 4455, an operator shall repair or replace the leaking component, vent the leaking component to a closed vent system, or remove the leaking component from operation as soon as practicable but not later than the time period specified in Table 3. For each calendar quarter, the operator may be allowed to extend the repair period as specified in Table 3, for a total number of leaking components, not to exceed 0.05 percent of the number of components inspected, by type, rounded upward to the nearest integer where required. [District Rule 4455, 5.3.5]
20. If the leaking component is an essential component or a critical component and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized, but the leak still exceeds any of the applicable leak standards of Rule 4455, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455 5.3.6]
21. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or any combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall comply with at least one of the requirements specified in Sections 5.3.7.1, 5.3.7.2, 5.3.7.3, or 5.3.7.4 by the applicable deadlines specified in Sections 5.3.7.5 and 5.3.7.6. If the original leaking component is replaced with a new like-in-kind component before incurring five repair actions for major leaks within 12-consecutive months, the repair count shall start over for the new component. An entire compressor or pump need not be replaced provided the compressor part(s) or pump part(s) that have incurred five repair actions as described in Section 5.3.7 are brought into compliance with at least one of the requirements of Sections 5.3.7.1 through 5.3.7.6. [District Rule 4455, 5.3.7]
22. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1]
23. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the APCO that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. The operator shall comply with the requirements of Sections 6.1.4 if there is any change in the description of major components or critical components. [District Rule 4455, 5.5.1 & 5.5.2]

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24. The operator shall keep a copy of the operator management plan at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved operator management plan. [District Rule 4455, 6.1.2 & 6.1.4]
25. The operator shall maintain an inspection log containing, at a minimum, 1) total number of components inspected, and total number and percentage of leaking components found by component types, 2) location, type, name or description of each leaking component, and description of any unit where the leaking component is found, 3) date of leak detection and method of leak detection, 4) for gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, 5) date of repair, replacement, or removal from operation of leaking components, 6) identification and location of essential component and critical components found leaking that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 7) methods used to minimize the leak from essential components and critical components that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 8) after the component is repaired or is replaced, the date of reinspection and the leak concentration in ppmv, 9) inspector's name, business mailing address, and business telephone number, and 10) the facility operator responsible for the inspection and repair program shall sign and date the inspection log certifying the accuracy of the information recorded in the log. [District Rule 4455, 6.2.1]
26. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, analyzer reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration. [District Rule 4455, 6.2.3]
27. The operator shall notify the APCO, by telephone or other methods approved by the APCO, of any process PRD release described in Sections 5.4.4 and 5.4.5, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. [District Rule 4455, 6.3.1]
28. The operator shall submit a written report to the APCO within thirty (30) calendar days following a PRD release subject to 6.3.1. The written report shall include 1) process PRD type, size, and location, 2) date, time and duration of the process PRD release, 3) types of VOC released and individual amounts, in pounds, including supporting calculations, 4) cause of the process PRD release, and 5) corrective actions taken to prevent a subsequent process PRD release. [District Rule 4455 6.3.2]
29. Copies of all records shall be retained for a minimum of five (5) years after the date of an entry. Such records shall be made available to the APCO, ARB, or US EPA upon request. [District Rule 4455, 6.2.2, 6.2.3 & 6.2.4]
30. Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4455, 6.4.1]
31. The VOC content shall be determined using American Society of Testing and Materials (ASTM) D 1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304-91 for liquids. [District Rule 4455, 6.4.2]
32. The percent by volume liquid evaporated at 1500C shall be determined using ASTM D 86. [District Rule 4455, 6.4.3]
33. Each owner or operator subject to the provisions of this subpart shall demonstrate compliance with the requirements of 40 CFR 60.482-1a through 60.482-10a or 40 CFR 60.480a(e) for all equipment within 180 days of initial startup. [40 CFR 60.482-1a(a)]
34. Valves in gas/vapor service and in light liquid service shall be monitored for the first time within 30 days after the initial startup date for the process unit as required by 40 CFR 60.482-2a and 40 CFR 60.482-7a. [40 CFR 60.482-2a (a) and 40 CFR 60.482-7 a(a)]

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35. Compliance with 40 CFR 60.482-1a to 60.482-10a will be determined by review of records and reports, review of performance test results, and inspection using the methods and procedures specified in 40 CFR 60.485a. [40 CFR 60.482-1a(b)]
36. An owner or operator may request a determination of equivalence of a means of emission limitation to the requirements of 40 CFR 60.482-2a, 60.482-3a, 60.482-5a, 60.482-6a, 60.482-7a, 60.482-8a, and 60.482-10a as provided in 40 CFR 60.484a. [40 CFR 60.482-1a(c)(1)]
37. If the Administrator makes a determination that a means of emission limitation is at least equivalent to the requirements of 40 CFR 60.482-2a, 60.482-3a, 60.482-5a, 60.482-6a, 60.482-7a, 60.482-8a, or 60.482-10a, an owner or operator shall comply with the requirements of that determination. [40 CFR 60.482-1a(c)(2)]
38. Equipment that is in vacuum service is excluded from the requirements of 40 CFR 60.482-2a to 40 CFR 60.482-10a if it is identified as required in 40 CFR 60.486a(e)(5). [40 CFR 60.482-1a(d)]
39. Each pump in light liquid service (PLLS) shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485a(b), except as provided in 40 CFR 60.482-1a(c) and 40 CFR 60.482-2a(d), (e), and (f). Each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. A leak is detected if an instrument reading of 500 ppmv or greater is measured or if there are indications of liquids dripping from the pump seal. [40 CFR 60.482-2a(a) and (b), and District Rule 2201]
40. When a leak is detected for each PLLS, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9a. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [40 CFR 60.482-2a(c)]
41. Each PLLS equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of 40 CFR 60.482-2a(a) provided the requirements specified in 40 CFR 60.482-2a(d)(1) through (6) are met. [40 CFR 60.482a(d)]
42. Any PLLS that is designated, as described in 40 CFR 60.486a(e)(1) and (2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppmv above background, is exempt from the requirements of 40 CFR 60.482-2a(a), (c), and (d) if the pump meets the requirements specified in 40 CFR 60.482-2a(e)(1), (2), and (3). [40 CFR 60.482-2a(e), and District Rule 2201]
43. If any PLLS is equipped with a closed vent system capable of capturing and transporting leakage from the seal or seals to a control device that complies with the requirements of 40 CFR 60.482-10a, it is exempt from the requirements of 40 CFR 60.482-2a(a) through (e). [40 CFR 60.482-2a(f)]
44. Any pump in PLLS that is designated, as described in 40 CFR 60.486a(f)(1), as an unsafe-to-monitor pump is exempt from the monitoring and inspection requirements of 40 CFR 60.482-2a(a) and 40 CFR 60.482-2a(d)(4) through (6) if:
1) The owner or operator of the pump demonstrates that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 60.482-2a(a); and 2) The owner or operator of the pump has a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment according to the procedures in 40 CFR 60.482-2a(c) if a leak is detected. [40 CFR 60.482-2a(g)]
45. Any pump that is located within the boundary of an unmanned plant site is exempt from the weekly visual inspection requirement of 40 CFR 60.482-2a(a)(2) and (d)(4) and the daily requirements of 40 CFR 60.482-2a(d)(5), provided that each pump is visually inspected as often as practicable and at least monthly. [40 CFR 60.482-2a(h)]
46. Unless exempt under 40 CFR 60.482-3a, each compressor shall be equipped with a seal system that includes a barrier fluid system and that prevents leakage of VOC to the atmosphere, except as provided in 40 CFR 60.482-3a(h) and (i). The barrier fluid system shall be in heavy liquid service or shall not be in VOC service. Each compressor shall be operated and equipped as specified in 40 CFR 60.482-3a(b)(1), (2), or (3). [40 CFR 60.482-3a(a), (b), and (c)]

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47. If a barrier fluid system is used for a compressor, the barrier fluid system shall be equipped with a sensor that will detect failure of the seal system, barrier fluid system or both. Each sensor shall be checked daily or shall be equipped with an audible alarm. The owner or operator shall determine, based on design considerations and operating experience, a criterion that indicates failure of the seal system, the barrier fluid system, or both. If the sensor indicates failure of the seal system, the barrier system, or both based on the established criterion, a leak is detected. [40 CFR 60.482-3a(d), (e), and (f)]
48. If a barrier fluid system is used for a compressor, detected leaks shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9a. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [40 CFR 60.482-3a(g)]
49. Any compressor that is designated, as described in 40 CFR 60.486a(e)(1) and (2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppmv above background, is exempt from the requirements of 40 CFR 60.482-3a(a) through (h) if the compressor meets the requirements specified in 40 CFR 60.482-3a(i)(1) and (2). [40 CFR 60.482-3a(i), and District Rule 2201]
50. Any existing reciprocating compressor in a process unit which becomes an affected facility under the provisions of 40 CFR 60.14 or 40 CFR 60.15 is exempt from 40 CFR 60.482a(a), (b), (c), (d), (e), and (h), provided the owner or operator demonstrates that recasting the distance piece or replacing the compressor are the only options available to bring the compressor into compliance with the provisions of 40 CFR 60.482-3a(a), (b), (c), (d), (e), and (h). [40 CFR 60.482-3a(j)]
51. Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 100 ppm above background, as determined by the methods specified in 40 CFR 60.485a(c). [40 CFR 60.482-4a(a), and District Rule 2201]
52. After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 100 ppm above background, as soon as practicable, but no later than 5 calendar days after the pressure release, except as provided in 40 CFR 60.482-9a. No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 100 ppm above background, by the methods specified in 40 CFR 60.485a(c). [40 CFR 60.482-4a(b), and District Rule 2201]
53. Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device as described in 40 CFR 60.482-10a is exempted from the requirements of 40 CFR 60.482-4a(a) and (b). [40 CFR 60.482-4a(c)]
54. Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the 40 CFR 60.482-4a(a) and (b), provided the owner or operator complies with the requirements in 40 CFR 60.482-4a(d)(2) of this section. After each pressure release, a new rupture disk shall be installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 60.482-9a. [40 CFR 60.482-4a(d)]
55. Except for in-situ sampling systems and sampling systems without purges, each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 60.482-1a(c). Each closed-purge, closed-loop, or closed-vent system shall comply with the requirements specified in 40 CFR 60.482-5a(b)(1), (2), (3), and (4). [40 CFR 60.482-5a(a), (b), and (c)]
56. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 60.482-1a(c). The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with this condition at all other times. [40 CFR 60.482-6a(a) and (c)]
57. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. [40 CFR 60.482-6a(b)]
58. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of 40 CFR 60.482-6a(a), (b) and (c). [40 CFR 60.482-6a(d)]

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59. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in 40 CFR 60.482-6a(a) through (c) are exempt from the requirements of 40 CFR 60.482-6a(a) through (c). [40 CFR 60.482-6a(e)]
60. Each valve in gas/vapor service and in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485a(b) and shall comply with 40 CFR 60.482-7a(b) through (e), except as provided in 40 CFR 60.482-7a(f), (g), and (h), 40 CFR 60.483-1a, 40 CFR 60.483-2a, 40 CFR 60.482-1a(c), and 40 CFR 60.482-1a(f). A leak is detected if an instrument reading of 100 ppmv or greater is measured. [40 CFR 60.482-7a(a) and (b), and District Rule 2201]
61. Any valve in gas/vapor service or in light liquid service for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months. [40 CFR 60.482-7a(c)(1) and (2)]
62. When a leak is detected for any valve in gas/vapor service or in light liquid service, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 60.482-9a. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the best practices specified in 40 CFR 60.482-7a(e)(1), (2), (3), and (4), where practicable. [40 CFR 60.482-7a(d) and (e)]
63. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486a(e)(2), for no detectable emissions, as indicated by an instrument reading of less than 100 ppmv above background, is exempt from the requirements of 40 CFR 60.482-7a(a) if the valve meets the requirements specified in 40 CFR 60.482-7a(f)(1), (2), and (3). [40 CFR 60.482-7a(f), and District Rule 2201]
64. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486a(f)(1), as an unsafe-to-monitor valve is exempt from the requirements of 40 CFR 60.482-7a(a) if: 1) The owner or operator of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 60.482-7a(a); and 2) The owner or operator of the valve adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times. [40 CFR 60.482-7a(g)]
65. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486a(f)(2), as a difficult-to-monitor valve is exempt from the requirements of 40 CFR 60.482-7a(a) if: 1) The owner or operator of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface; 2) The process unit within which the valve is located either becomes an affected facility through 40 CFR 60.14 or 40 CFR 60.15 or the owner or operator designates less than 3.0 percent of the total number of valves as difficult-to-monitor; and 3) The owner or operator of the valve follows a written plan that requires monitoring of the valve at least once per calendar year. [40 CFR 60.482-7a(h)]
66. If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, the owner or operator shall follow either one of the following procedures: 1) The owner or operator shall monitor the equipment within 5 days by the method specified in 40 CFR 60.485a(b) and shall comply with the requirements of 40 CFR 60.482-8a(b) through (d); or 2) The owner or operator shall eliminate the visual, audible, olfactory, or other indication of a potential leak. A leak is detected if an instrument reading of 100 ppmv or greater for valves and connectors and 500 ppmv or greater for pumps and compressor seals, is measured. [40 CFR 60.482-8a(a) and (b); and District Rule 2201]
67. When a leak is detected in pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9a. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the best practices described under 40 CFR 60.482-2a(c)(2) and 40 CFR 60.482-7a(e). [40 CFR 60.482-8a(c) and (d)]
68. For closed vent systems and control devices, vapor recovery systems shall be designed and operated to recover the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent. [40 CFR 60.482-10a(b)]

CONDITIONS CONTINUE ON NEXT PAGE

69. For closed vent systems and control devices, enclosed combustion devices shall be designed and operated to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 degrees C. [40 CFR 60.482-10a(c)]
70. Owners or operators of control devices shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs. [40 CFR 60.482-10a(e)]
71. Except as provided in 40 CFR 60.482-10a(i) through (k), each closed vent system shall be inspected according to the procedures and schedule specified in 40 CFR 60.482-10a(f)(1) and (f)(2). Leaks, as indicated by an instrument reading greater than 100 ppmv for valves and connectors or 500 ppmv for pumps and compressor seals above background or by visual inspections, shall be repaired as soon as practicable except as provided in 40 CFR 60.482-10a(h). A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. Repair shall be completed no later than 15 calendar days after the leak is detected. [40 CFR 60.482-10a(f) and (g), and District Rule 2201]
72. Delay of repair of a closed vent system for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next process unit shutdown. [40 CFR 60.482-10a(h)]
73. If a vapor collection system or closed vent system is operated under a vacuum, it is exempt from the inspection requirements of 40 CFR 60.482-10a(f)(1)(i) and (f)(2). [40 CFR 60.482-10a(i)]
74. Any parts of the closed vent system that are designated, as described in 40 CFR 60.482-10a(l)(1), as unsafe to inspect are exempt from the inspection requirements of 40 CFR 60.482-10a(f)(1)(i) and (f)(2) if they comply with the requirements specified in 40 CFR 60.482-10a (j)(1) and (j)(2). [40 CFR 60.482-10a(j)]
75. Any parts of the closed vent system that are designated, as described in 40 CFR 60.482-10a(l)(2), as difficult to inspect are exempt from the inspection requirements of 40 CFR 60.482-10a(f)(1)(i) and (f)(2) if they comply with the requirements specified in 40 CFR 60.482-10a(k)(1) through (k)(3). [40 CFR 60.482-10a(k)]
76. The owner or operator shall record the following information: 1) Identification of all parts of the closed vent system that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment; 2) Identification of all parts of the closed vent system that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment; 3) For each inspection during which a leak is detected, a record of the information specified in 40 CFR 60.486a(c); 4) For each inspection conducted in accordance with 40 CFR 60.485a(b) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected; and 5) For each visual inspection conducted in accordance with 40 CFR 60.482-10a(f)(1)(ii) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 60.482-10a(l)]
77. Closed vent systems and control devices shall be operated at all times when emissions may be vented to them. [40 CFR 60.482-10a(m)]
78. The owner or operator may elect to comply with the applicable provisions for valves in gas/vapor service and in light liquid service as specified in 40 CFR 60.483-1a and 60.483-2a. [40 CFR 60.483-1a and 60.483-2a]
79. The owner or operator may apply to the Administrator for a determination of equivalency for any means of emission limitation that achieves a reduction in emissions of VOC at least equivalent to the reduction in emissions of VOC achieved by the controls required in Subpart VVa. [40 CFR 60.484a(a)]
80. The owner or operator shall determine compliance with the standards in 40 CFR 60.482a, 60.483a, and 60.484a as follows: Method 21 shall be used to determine the presence of leaking sources. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21. The following calibration gases shall be used: (i) Zero air (less than 10 ppmv of hydrocarbon in air); and (ii) A mixture of methane or n-hexane and air at a concentration of about, but less than, 100 ppmv methane or n-hexane for valves and connectors and 500 ppmv methane or n-hexane for pumps and compressor seals. [40 CFR 60.483a(b), and District Rule 2201]

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CONDITIONS CONTINUE ON NEXT PAGE

81. The owner or operator shall determine compliance with the no detectable emission standards in 40 CFR 60.482-2a(e), 60.482-3a(i), 60.482-4a, 60.482-7a(f), and 60.482-10a(e) as follows: 1) The requirements of 40 CFR 60.485a(b) shall apply. 2) Method 21 shall be used to determine the background level. All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 100 ppmv methane for valves and connectors and 500 ppmv methane for pumps and compressor seals for determining compliance. [40 CFR 60.485a(c); and District Rule 2201]
82. The owner or operator shall test each piece of equipment unless demonstrated that a process unit is not in VOC service, i.e., that the VOC content would never be reasonably expected to exceed 10 percent by weight. For purposes of this demonstration, the following methods and procedures shall be used: 1) Procedures that conform to the general methods in ASTM E260-73, 91, or 96, E168-67, 77, or 92, E169-63, 77, or 93 (incorporated by reference as seen in 40 CFR 60.17) shall be used to determine the percent VOC content in the process fluid that is contained in or contacts a piece of equipment; 2) Organic compounds that are considered by the Administrator to have negligible photochemical reactivity may be excluded from the total quantity of organic compounds in determining the VOC content of the process fluid; and 3) Engineering judgment may be used to estimate the VOC content, if a piece of equipment had not been shown previously to be in service. If the Administrator disagrees with the judgment, the previous two procedures as specified in 40 CFR 60.485a(d)(1) and (2) shall be used to resolve the disagreement. [40 CFR 60.485a(d)]
83. The owner or operator shall demonstrate that an equipment is in light liquid service by showing that all the following conditions apply: 1) The vapor pressure of one or more of the components is greater than 0.3 kPa at 20 °C (1.2 in. H₂O at 68 degrees F). Standard reference texts or ASTM D2879-83, 96, or 97 (incorporated by reference as seen in 40 CFR 60.17) shall be used to determine the vapor pressures; 2) The total concentration of the pure components having a vapor pressure greater than 0.3 kPa at 20 degrees Celsius is equal to or greater than 20 percent by weight; and 3) The fluid is a liquid at operating conditions. [40 CFR 60.485a(e)]
84. An owner or operator of more than one affected facility subject to the provisions Subpart VVa may comply with the recordkeeping requirements for these facilities in one recordkeeping system if the system identifies each record by each facility. [40 CFR 60.486a(a)]
85. When each leak is detected as specified in 40 CFR 60.482-2a, 60.482-3a, 60.482-7a, 60.482-8a, and 60.483-2a, the following requirements apply: 1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment; 2) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in 40 CFR 60.482-7a(c) and no leak has been detected during those 2 months; and 3) The identification on equipment except on a valve, may be removed after it has been repaired. [40 CFR 60.486a(b)]
86. When each leak is detected as specified in 40 CFR 60.482-2a, 60.482-3a, 60.482-7a, 60.482-8a, and 60.483-2a, the following information shall be recorded in a log and shall be kept for 5 years in a readily accessible location: 1) The instrument and operator identification numbers and the equipment identification number; 2) The date the leak was detected and the dates of each attempt to repair the leak; 3) Repair methods applied in each attempt to repair the leak; 4) "Above 100 ppmv for valves and connectors or 500 ppmv for pumps and compressor seals" if the maximum instrument reading measured by the methods specified in 40 CFR 60.485a(a) after each repair attempt is equal to or greater than 100 ppmv for valves and connectors or 500 ppmv for pumps and compressor seals; 5) "Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak; 6) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown; 7) The expected date of successful repair of the leak if a leak is not repaired within 15 days; 8) Dates of process unit shutdown that occur while the equipment is unrepaired; and 9) The date of successful repair of the leak. [40 CFR 60.486a(c); and District Rule 2201]
87. The following information pertaining to the design requirements for closed vent systems and control devices described in 40 CFR 60.482-10a shall be recorded and kept in a readily accessible location: 1) Detailed schematics, design specifications, and piping and instrumentation diagrams; 2) The dates and descriptions of any changes in the design specifications; 3) A description of the parameter or parameters monitored, as required in 40 CFR 60.482-10a(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring; 4) Periods when the closed vent systems and control devices required in 40 CFR 60.482-2a, 60.482-3a, 60.482-4a, and 60.482-5a are not operated as designed, including periods when a flare pilot light does not have a flame; and 5) Dates of startups and shutdowns of the closed vent systems and control devices required in 40 CFR 60.482-2a, 60.482-3a, 60.482-4a, and 60.482-5a. [40 CFR 60.486a(d)]

CONDITIONS CONTINUE ON NEXT PAGE

88. The following information pertaining to all equipment subject to the requirements in 40 CFR 60.482-1a to 60.482-10a shall be recorded in a log that is kept in a readily accessible location: 1) A list of identification numbers for equipment subject to the requirements of Subpart VVa; 2) (i) A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of 40 CFR 60.482-2a(e), 60.482-3a(i) and 60.482-7a(f). (ii) The designation of equipment as subject to the requirements of 40 CFR 60.482-2a(e), 60.482-3a(i) and 60.482-7a(f) shall be signed by the owner or operator; 3) A list of equipment identification numbers for pressure relief devices required to comply with [±] 60.482-4a; 4) (i) The dates of each compliance test as required in 40 CFR 60.482-2a(e), 60.482-3a(i), [±] 60.482-4a, and 60.482-7a(f). (ii) The background level measured during each compliance test. (iii) The maximum instrument reading measured at the equipment during each compliance test; and 5) A list of identification numbers for equipment in vacuum service. [40 CFR 60.486a(e)]
89. The following information pertaining to all valves subject to the requirements of 40 CFR 60.482-7a(g) and (h) and to all pumps subject to the requirements of 40 CFR 60.482-2a(g) shall be recorded in a log that is kept in a readily accessible location: 1) A list of identification numbers for valves and pumps that are designated as unsafe-to-monitor, an explanation for each valve or pump stating why the valve or pump is unsafe-to-monitor, and the plan for monitoring each valve or pump; and 2) A list of identification numbers for valves that are designated as difficult-to-monitor, an explanation for each valve stating why the valve is difficult-to-monitor, and the schedule for monitoring each valve. [40 CFR 60.486a(f)]
90. The following information shall be recorded for valves complying with 40 CFR 60.483-2a: 1) A schedule of monitoring; 2) The percent of valves found leaking during each monitoring period. [40 CFR 60.486a(g)]
91. The following information shall be recorded in a log that is kept in a readily accessible location: 1) Design criterion required in 40 CFR 60.482-2a(d)(5) and 60.482-3a(e)(2) and explanation of the design criterion; and 2) Any changes to this criterion and the reasons for the changes. [40 CFR 60.486a(h)]
92. The following information shall be recorded in a log that is kept in a readily accessible location for use in determining exemptions as provided in 40 CFR 60.480a(d): 1) An analysis demonstrating the design capacity of the affected facility; 2) A statement listing the feed or raw materials and products from the affected facilities and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol; and 3) An analysis demonstrating that equipment is not in VOC service. [40 CFR 60.486a(i)]
93. Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location. [40 CFR 60.486a(j)]
94. The provisions of 40 CFR 60.7 (b) and (d) do not apply to affected facilities subject to Subpart VVa. [40 CFR 60.486a(k)]
95. All semiannual reports to the Administrator shall include the following information, summarized from the information in 40 CFR 60.486a: 1) Process unit identification; 2) For each month during the semiannual reporting period, (i) Number of valves for which leaks were detected as described in 40 CFR 60.482-7a(b) or 40 CFR 60.483-2a, (ii) Number of valves for which leaks were not repaired as required in 40 CFR 60.482-7a(d)(1), (iii) Number of pumps for which leaks were detected as described in 40 CFR 60.482-2a(b) and (d)(6)(i), (iv) Number of pumps for which leaks were not repaired as required in 40 CFR 60.482-2a(c)(1) and (d)(6)(ii), (v) Number of compressors for which leaks were detected as described in 40 CFR 60.482-3a(f), (vi) Number of compressors for which leaks were not repaired as required in 40 CFR 60.482-3a(g)(1), and (vii) The facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible; 3) Dates of process unit shutdowns which occurred within the semiannual reporting period; 4) Revisions to items reported in the semiannual report if changes have occurred since the initial report, as required in 40 CFR 60.487a(a) and (b), or subsequent revisions to the initial report. [40 CFR 60.487a(c)]
96. An owner or operator electing to comply with the provisions of 40 CFR 60.483-1a and 60.483-2a shall notify the Administrator of the alternative standard selected 90 days before implementing either of the provisions. [40 CFR 60.487a(d)]
97. The semiannual reporting requirements of 40 CFR 60.487a(a), (b), and (c) remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such State. In that event, affected sources within the State will be relieved of the obligation to comply with the requirements of 40 CFR 60.487a(a), (b), and (c), provided that they comply with the requirements established by the State. [40 CFR 60.487a(f)]

CONDITIONS CONTINUE ON NEXT PAGE

98. Operator shall notify the Administrator of the actual date of initial startup postmarked within 15 days after such date. [40 CFR 60.7 (a)(3)]
99. Operator shall notify the Administrator of the date construction is commenced postmarked no later than 30 days after such date. Notification shall include the Operating Plan. [40 CFR 60.113b(c)(1) and 60.7 (a)(1)]
100. Permittee shall comply with all notification and recordkeeping requirements of 40 CFR Part 60.7. [40 CFR 60.7]
101. Permittee shall maintain with the permit accurate fugitive component counts and resulting emissions calculated as required by this permit. [District Rule 2201]
102. All records required by Rule 4455 shall be retained for a minimum period of 5 years and shall be made available to the APCO, ARB and US EPA upon request. [District Rule 4455]
103. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 3612 lb, 2nd quarter - 3612 lb, 3rd quarter - 3612 lb, and fourth quarter - 3612 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 4/21/11) for the ERC specified below. [District Rule 2201]
104. ERC Certificate Number S-3711-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]
105. ATC shall be implemented concurrently with ATCs S-6971-1-4 and '-16-0 through '-21-0. [District Rule 2201]

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
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PERMIT NO: S-6971-16-0

LEGAL OWNER OR OPERATOR: CRIMSON RENEWABLE ENERGY, LP
MAILING ADDRESS: 950 17TH ST - STE 2650
DENVER, CO 80202

LOCATION: 17731 MILLUX RD
BAKERSFIELD, CA

EQUIPMENT DESCRIPTION:
142,800 GALLON BIODIESEL SETTLING TANK W/TVR SHARED WITH PERMIT -1 (PF-4)

CONDITIONS

1. Facility will have up to 12 months from the date of ATC issuance to either submit a Title V Application or comply with District Rule 2530 Federally Enforceable Potential to Emit. [District Rules 2520 and 2530]
2. This tank shall be connected to the gas blanket and vapor control system identified on permit S-6971-1. [District Rules 2201 & 4623]
3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623]
4. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623]
6. Fugitive VOC emissions rate from components affixed to the tank and in the vapor line from the tank to the vapor control system trunk line shall be calculated using EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCMIA Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals, 93% connectors, 0% open ended lines, and 92% pressure relief valves). Permittee shall maintain with the permit an accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using above specified leak rates and control efficiencies. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

S-6971-16-0 : Feb 6 2014 10:06AM - EDGENILR : Joint Inspection NOT Required

7. Fugitive VOC emission rate from tank and from all components affixed to the tank in the vapor line from the tank to the vapor control system trunk line shall not exceed 0.9 lb/day. [District Rule 2201]
8. If any of the tank components are found to be leaking above background (>100 ppmv for valves and connectors and 500 ppmv for pump and compressor seals), as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 & 4623]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking by the operator with a reading > 10,000 ppmv, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623]
12. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623]
13. Upon detection of a gas leak, defined as a VOC concentration >100 ppmv for valves and connectors and >500 ppmv for pump and compressor seals as measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623]
14. Leaking components, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, and that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623]
15. If a component type for a given tank is found to leak, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623]
16. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020]
17. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623]
18. Permittee shall comply with all applicable tank degassing and interior cleaning requirements specified in Section 5.7.5 of Rule 4623. [District Rule 4623]

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CONDITIONS CONTINUE ON NEXT PAGE

19. {2490} 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]
20. ATC shall be implemented concurrently with ATCs S-6971-1-4 and '11-1. [District Rule 2201]
21. This permit unit is fully offset for VOC emissions. [District Rule 2201]

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-6971-17-0

LEGAL OWNER OR OPERATOR: CRIMSON RENEWABLE ENERGY, LP
MAILING ADDRESS: 950 17TH ST - STE 2650
DENVER, CO 80202

LOCATION: 17731 MILLUX RD
BAKERSFIELD, CA

EQUIPMENT DESCRIPTION:
4,000 GALLON GLYCERIN SETTLING TANK W/ TVR SHARED WITH PERMIT -1 (V-560)

CONDITIONS

1. Facility will have up to 12 months from the date of ATC issuance to either submit a Title V Application or comply with District Rule 2530 Federally Enforceable Potential to Emit. [District Rules 2520 and 2530]
2. This tank shall be connected to the gas blanket and vapor control system identified on permit S-6971-1. [District Rules 2201 & 4623]
3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623]
4. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623]
6. Fugitive VOC emissions rate from components affixed to the tank and in the vapor line from the tank to the vapor control system trunk line shall be calculated using EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCM1 Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals, 93% connectors, 0% open ended lines, and 92% pressure relief valves). Permittee shall maintain with the permit an accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using above specified leak rates and control efficiencies. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

S-6971-17-0, Feb 9 2014 10:08AM - EDGEHILL : Joint Inspection NOT Required

7. Fugitive VOC emission rate from tank and from all components affixed to the tank in the vapor line from the tank to the vapor control system trunk line shall not exceed 1.2 lb/day. [District Rule 2201]
8. If any of the tank components are found to be leaking above background (>100 ppmv for valves and connectors and 500 ppmv for pump and compressor seals), as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21), operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 & 4623]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking by the operator with a reading > 10,000 ppmv, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623]
12. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623]
13. Upon detection of a gas leak, defined as a VOC concentration >100 ppmv for valves and connectors and >500 ppmv for pump and compressor seals as measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623]
14. Leaking components, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, and that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623]
15. If a component type for a given tank is found to leak, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623]
16. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020]
17. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623]
18. Permittee shall comply with all applicable tank degassing and interior cleaning requirements specified in Section 5.7.5 of Rule 4623. [District Rule 4623]

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CONDITIONS CONTINUE ON NEXT PAGE

19. {2490} 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]
20. ATC shall be implemented concurrently with ATCs S-6971-1-4 and '-11-1. [District Rule 2201]
21. This permit unit is fully offset for VOC emissions. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-6971-18-0

LEGAL OWNER OR OPERATOR: CRIMSON RENEWABLE ENERGY, LP
MAILING ADDRESS: 950 17TH ST - STE 2650
DENVER, CO 80202

LOCATION: 17731 MILLUX RD
BAKERSFIELD, CA

EQUIPMENT DESCRIPTION:
2,500 GALLON OIL SEPARATION TANK W/ TVR SHARED WITH PERMIT -1 (V-401)

CONDITIONS

1. Facility will have up to 12 months from the date of ATC issuance to either submit a Title V Application or comply with District Rule 2530 Federally Enforceable Potential to Emit. [District Rules 2520 and 2530]
2. This tank shall be connected to the gas blanket and vapor control system identified on permit S-6971-1. [District Rules 2201 & 4623]
3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623]
4. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623]
6. Fugitive VOC emissions rate from components affixed to the tank and in the vapor line from the tank to the vapor control system trunk line shall be calculated using EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCOMI Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals, 93% connectors, 0% open ended lines, and 92% pressure relief valves). Permittee shall maintain with the permit an accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using above specified leak rates and control efficiencies. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

S-6971-18-0 : Feb 8 2014 10:06AM - EDGEHILR : Joint Inspection NOT Required

7. Fugitive VOC emission rate from tank and from all components affixed to the tank in the vapor line from the tank to the vapor control system trunk line shall not exceed 1.5 lb/day. [District Rule 2201]
8. If any of the tank components are found to be leaking above background (>100 ppmv for valves and connectors and 500 ppmv for pump and compressor seals), as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21), operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 & 4623]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking by the operator with a reading > 10,000 ppmv, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623]
12. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623]
13. Upon detection of a gas leak, defined as a VOC concentration >100 ppmv for valves and connectors and >500 ppmv for pump and compressor seals as measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623]
14. Leaking components, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, and that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623]
15. If a component type for a given tank is found to leak, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623]
16. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020]
17. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623]
18. Permittee shall comply with all applicable tank degassing and interior cleaning requirements specified in Section 5.7.5 of Rule 4623. [District Rule 4623]

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CONDITIONS CONTINUE ON NEXT PAGE

19. {2490} 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]
20. ATC shall be implemented concurrently with ATCs S-6971-1-4 and '-11-1. [District Rule 2201]
21. This permit unit is fully offset for VOC emissions. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-6971-19-0

LEGAL OWNER OR OPERATOR: CRIMSON RENEWABLE ENERGY, LP
MAILING ADDRESS: 950 17TH ST - STE 2650
DENVER, CO 80202

LOCATION: 17731 MILLUX RD
BAKERSFIELD, CA

EQUIPMENT DESCRIPTION:
15,000 GALLON POST TE SURGE TANK W/ TVR SHARED WITH PERMIT -1 (V-360)

CONDITIONS

1. Facility will have up to 12 months from the date of ATC issuance to either submit a Title V Application or comply with District Rule 2530 Federally Enforceable Potential to Emit. [District Rules 2520 and 2530]
2. This tank shall be connected to the gas blanket and vapor control system identified on permit S-6971-1. [District Rules 2201 & 4623]
3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623]
4. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623]
6. Fugitive VOC emissions rate from components affixed to the tank and in the vapor line from the tank to the vapor control system trunk line shall be calculated using EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCOMI Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals, 93% connectors, 0% open ended lines, and 92% pressure relief valves). Permittee shall maintain with the permit an accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using above specified leak rates and control efficiencies. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

S-6971-19-0 : Feb 6 2014 10:06AM - EDGEHILL : Joint Inspection NOT Required

7. Fugitive VOC emission rate from tank and from all components affixed to the tank in the vapor line from the tank to the vapor control system trunk line shall not exceed 1.4 lb/day. [District Rule 2201]
8. If any of the tank components are found to be leaking above background (>100 ppmv for valves and connectors and 500 ppmv for pump and compressor seals), as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 & 4623]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking by the operator with a reading > 10,000 ppmv, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623]
12. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623]
13. Upon detection of a gas leak, defined as a VOC concentration >100 ppmv for valves and connectors and >500 ppmv for pump and compressor seals as measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623]
14. Leaking components, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, and that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623]
15. If a component type for a given tank is found to leak, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623]
16. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020]
17. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623]
18. Permittee shall comply with all applicable tank degassing and interior cleaning requirements specified in Section 5.7.5 of Rule 4623. [District Rule 4623]

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CONDITIONS CONTINUE ON NEXT PAGE

19. {2490} 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]
20. ATC shall be implemented concurrently with ATCs S-6971-1-4 and '-11-1. [District Rule 2201]
21. This permit unit is fully offset for VOC emissions. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-6971-20-0

LEGAL OWNER OR OPERATOR: CRIMSON RENEWABLE ENERGY, LP
MAILING ADDRESS: 950 17TH ST - STE 2650
DENVER, CO 80202

LOCATION: 17731 MILLUX RD
BAKERSFIELD, CA

EQUIPMENT DESCRIPTION:
6,000 GALLON NEUTRALIZATION TANK W/ TVR SHARED WITH PERMIT -1 (V-460)

CONDITIONS

1. Facility will have up to 12 months from the date of ATC issuance to either submit a Title V Application or comply with District Rule 2530 Federally Enforceable Potential to Emit. [District Rules 2520 and 2530]
2. This tank shall be connected to the gas blanket and vapor control system identified on permit S-6971-1. [District Rules 2201 & 4623]
3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623]
4. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623]
6. Fugitive VOC emissions rate from components affixed to the tank and in the vapor line from the tank to the vapor control system trunk line shall be calculated using EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCOMI Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals, 93% connectors, 0% open ended lines, and 92% pressure relief valves). Permittee shall maintain with the permit an accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using above specified leak rates and control efficiencies. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

S-6971-20-0 : Feb 6 2014 10:06AM - EDGEHILR : Joint Inspection NOT Required

7. Fugitive VOC emission rate from tank and from all components affixed to the tank in the vapor line from the tank to the vapor control system trunk line shall not exceed 4.1 lb/day. [District Rule 2201]
8. If any of the tank components are found to be leaking above background (>100 ppmv for valves and connectors and 500 ppmv for pump and compressor seals), as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 & 4623]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking by the operator with a reading > 10,000 ppmv, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623]
12. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623]
13. Upon detection of a gas leak, defined as a VOC concentration >100 ppmv for valves and connectors and >500 ppmv for pump and compressor seals as measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623]
14. Leaking components, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, and that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623]
15. If a component type for a given tank is found to leak, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623]
16. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020]
17. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623]
18. Permittee shall comply with all applicable tank degassing and interior cleaning requirements specified in Section 5.7.5 of Rule 4623. [District Rule 4623]

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CONDITIONS CONTINUE ON NEXT PAGE

19. {2490} 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]
20. ATC shall be implemented concurrently with ATCs S-6971-1-4 and '-11-1. [District Rule 2201]
21. This permit unit is fully offset for VOC emissions. [District Rule 2201]

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

DRAFT

PERMIT NO: S-6971-21-0

LEGAL OWNER OR OPERATOR: CRIMSON RENEWABLE ENERGY, LP
MAILING ADDRESS: 950 17TH ST - STE 2650
DENVER, CO 80202

LOCATION: 17731 MILLUX RD
BAKERSFIELD, CA

EQUIPMENT DESCRIPTION:
6,000 GALLON NEUTRALIZATION TANK W/ TVR SHARED WITH PERMIT -1 (V-470)

CONDITIONS

1. Facility will have up to 12 months from the date of ATC issuance to either submit a Title V Application or comply with District Rule 2530 Federally Enforceable Potential to Emit. [District Rules 2520 and 2530]
2. This tank shall be connected to the gas blanket and vapor control system identified on permit S-6971-1. [District Rules 2201 & 4623]
3. All piping, valves, and fittings shall be constructed and maintained in a leak-free condition. [District Rule 4623]
4. A leak-free condition is defined as a condition without a gas leak. A gas leak is defined as a reading in excess of 10,000 ppmv, above background, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21. A reading in excess of 10,000 ppmv above background is a violation of this permit and Rule 4623 and shall be reported as a deviation. [District Rule 4623]
5. Any tank gauging or sampling device on a tank vented to the vapor recovery system shall be equipped with a leak-free cover which shall be closed at all times except during gauging or sampling. [District Rule 4623]
6. Fugitive VOC emissions rate from components affixed to the tank and in the vapor line from the tank to the vapor control system trunk line shall be calculated using EPA document Protocol for Equipment Leak Emission Rates, Table 2-1, SOCOMI Average Emissions Factors with LDAR control efficiencies provided in Table 5-2 of EPA-453/R-95-017 for HON (88% light liquid valves, 75% light liquid pump and compressor seals, 93% connectors, 0% open ended lines, and 92% pressure relief valves). Permittee shall maintain with the permit an accurate fugitive component counts of vapor and condensate handling equipment and resulting emissions calculated using above specified leak rates and control efficiencies. [District Rule 2201]

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YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

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DAVID WARNER, Director of Permit Services

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7. Fugitive VOC emission rate from tank and from all components affixed to the tank in the vapor line from the tank to the vapor control system trunk line shall not exceed 4.6 lb/day. [District Rule 2201]
8. If any of the tank components are found to be leaking above background (>100 ppmv for valves and connectors and 500 ppmv for pump and compressor seals), as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, operator shall immediately affix a tag and maintain records of gas leak detection readings, date/time leak was discovered, and date/time the component was repaired to a leak-free condition. [District Rules 2201 & 4623]
9. All piping, fittings, and valves on this tank shall be inspected annually by the facility operator in accordance with EPA Method 21, with the instrument calibrated with methane, to ensure compliance with the leaking provisions of this permit. [District Rules 2201 and 4623]
10. Any component found to be leaking by the operator with a reading > 10,000 ppmv, as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, on two consecutive annual inspections is in violation of District Rule 4623, even if it is under the voluntary inspection and maintenance program. [District Rules 2201 and 4623]
11. Operator shall visually inspect tank shell, hatches, seals, seams, cable seals, valves, flanges, connectors, and any other piping components directly affixed to the tank and within five feet of the tank at least once per year for liquid leaks, and with a portable hydrocarbon detection instrument conducted in accordance with EPA Method 21 for gas leaks. Operator shall also visually or ultrasonically inspect as appropriate, the external shells and roofs of uninsulated tanks for structural integrity annually. [District Rule 2201 and 4623]
12. Upon detection of a liquid leak, defined as a leak rate of greater than or equal to 30 drops per minute, operator shall repair the leak within 8 hours. For leaks with a liquid leak rate of between 3 and 30 drops per minute, the leaking component shall be repaired within 24 hours after detection. [District Rules 2201 and 4623]
13. Upon detection of a gas leak, defined as a VOC concentration >100 ppmv for valves and connectors and >500 ppmv for pump and compressor seals as measured in accordance with EPA Method 21, operator shall take one of the following actions: 1) eliminate the leak within 8 hours after detection; or 2) if the leak cannot be eliminated, then minimize the leak to the lowest possible level within 8 hours after detection by using best maintenance practices, and eliminate the leak within 48 hours after minimization. In no event shall the total time to minimize and eliminate a leak exceed 56 hours after detection. [District Rules 2201 and 4623]
14. Leaking components, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, and that have been discovered by the operator that have been immediately tagged and repaired within the timeframes specified in District Rule 4623, Table 3 shall not constitute a violation of this rule. Leaking components as defined by District Rule 4623 discovered by District staff that were not previously identified and/or tagged by the operator, and/or any leaks that were not repaired within the timeframes specified in District Rule 4623, Table 3 shall constitute a violation of this rule. [District Rules 2201 and 4623]
15. If a component type for a given tank is found to leak, with a reading > 10,000 ppmv as measured by a portable hydrocarbon detection instrument in accordance with the procedures specified in EPA Test Method 21, during an annual inspection, operator shall conduct quarterly inspections of that component type on the tank or tank system for four consecutive quarters. If no components are found to leak after four consecutive quarters, the operator may revert to annual inspections. [District Rules 2201 and 4623]
16. This permit authorizes tank cleaning that is not the result of breakdowns or poor maintenance as a routine maintenance activity. [District Rule 2020]
17. Permittee shall keep in their facility at all times a copy of the letter sent to the APCO requesting participation in the Rule 4623 Fixed Roof Tank Preventive Inspection and Maintenance Program, and Tank Interior Cleaning Program, and maintain the records of annual tank inspections, maintenance, and cleaning to document the participation in the program. [District Rule 4623]
18. Permittee shall comply with all applicable tank degassing and interior cleaning requirements specified in Section 5.7.5 of Rule 4623. [District Rule 4623]

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19. {2490} 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]
20. ATC shall be implemented concurrently with ATCs S-6971-1-4 and '11-1. [District Rule 2201]
21. This permit unit is fully offset for VOC emissions. [District Rule 2201]

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