

PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

33 North Stone Avenue Suite 700 Tucson, AZ 85701 Phone: (520) 724-7400

AIR QUALITY PERMIT

(As required by Title 17.12, Article II, Pima County Code)

ISSUED TO

**SFPP, L.P.
TUCSON TERMINAL
3841 EAST REFINERY WAY
TUCSON, AZ 85713**

This air quality permit does not relieve applicant of responsibility for meeting all air pollution regulations

**All terms and Conditions of this permit are Federally Enforceable by the
Administrator of the United States Environmental Protection Agency
(U.S.EPA) under the Clean Air Act, except as otherwise noted.**

THIS PERMIT IS ISSUED SUBJECT TO THE FOLLOWING Conditions contained in Parts A & B
and Attachments 1, 2, 3 & 4

PDEQ PERMIT NUMBER 1674

PERMIT CLASS I

PERMIT ISSUED June 18, 2015

EXPIRES June 17, 2020

PERMIT REVISED: May 24, 2019



SIGNATURE

Rupesh Patel, Air Program Manager, PDEQ

TITLE

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PERMIT SUMMARY

SFPP, L.P. Tucson Terminal (SFPP) is a bulk fuel products distribution terminal with storage tanks, loading racks and other associated equipment (including air pollution control equipment). The facility constitutes an existing **Class I, Major Categorical Source** of VOC, a synthetic minor source of hazardous air pollutants (HAP), and a true minor source of all other criteria pollutants and operates in an area that is classified as attainment for all criteria pollutants. The facility operates under the following industrial classification: SIC Code 4226 (NAICS: 424710): Special Warehousing and Storage, NEC - Petroleum Bulk Terminals for hire).

The terminal receives petroleum fuel products via pipeline or truck, and blends products with additives and oxygenates prior to distribution. The final fuel is loaded into truck cargo tanks Petroleum products are received directly via an interstate pipeline originating in Texas. Ethanol (an oxygenating additive) may be received by railcar or truck while other additives are typically received by truck. The terminal does not process any incoming materials and is thus not classified as a refinery.

SFPP may add customer or supplier specific additives at the time that products are dispensed at the loading racks. Materials and products handled at the terminal are various grades of gasoline, diesel, transmix, aviation fuels, ethanol (an oxygenating additive), and other customer-specific proprietary and generic fuel additives. The terminal operates continuously in all phases described therefore loading racks are available for customer trucks on a 24/7 basis.

On June 4, 2018 by PDEQ approved a minor permit revision application to transfer of the assets and operations formerly owned and operated by HEP Refining, L.L.C. (Class II Air Quality Permit #5014). The former HEP facility is contiguous to the SFPP, L.P. terminal and includes: 5 multiproduct (gasoline) storage tanks (T-47 – T-51), 1 diesel storage tank (T-46), an Ethanol storage tank (T-52), 4 additive tanks (TA-581, TA-630, TA-640, and TA-314), one loading rack (LR-6) and a NAO thermal oxidizer to control vapors from the loading rack. This is the second acquisition by SFPP, L.P. since issuance of the Title V permit. The HEP Class II air quality permit limited throughput of all storage vessels to 240 million gallons of combined gasoline and ethanol in any 12 consecutive month period. The incorporation of the former HEP assets under this permit does not involve a physical change or change in the method of operation at either facility. With this revision, SFPP, L.P. shall be held to the same synthetic throughput limit that existed in the permit for the former HEP facility.

The current renewed permit also includes a previous revision to incorporate the existing assets formerly owned and operated by Chevron (Former Class II Air Quality Permit #1767).

Air pollution sources at the facility include point and fugitive emissions sources as a result of the storage, handling, and transfer of fuel and additives into cargo tank trucks, the processing fuel vapors collected by the loading racks, and from the landing and refilling of 5 “drain-dry” storage tanks at the facility. The facility contains 45 active above ground fuel storage tanks, six truck loading racks, two thermal oxidizers, a vapor recovery system, rail car and truck off-loading equipment for denatured alcohol, loading rack offloading pumps and equipment for off-spec products, a pipe flow meter “prover” system with associated sump, and facility oil/water separator systems.

The following emission rates are for reference purposes only and are used to establish a baseline of emissions for the source. They are not intended to be enforceable emission limits unless specified in Part B of this Permit. The estimates are a result of information submitted in the renewal application submitted March 07, 2011 (updated November 22) and the minor permit revisions submitted August 30 & November 13, 2018.

Facility-Wide Regulated Pollutant Emissions (tons/yr)*							
PM₁₀	PM_{2.5}	NO_x	SO₂	CO	VOC	HAP Total	HAP Single
0.72	0.72	21.41	0.73	51.26	289.63	15.30	4.74

* Source: Based on EPA AP-42 Emission Factors, including off-spec product offloading as fugitive emissions.

PART A

(References to A.R.S. are references to the Arizona Revised Statutes, references to A.A.C. are references to the Arizona Administrative Code, and references to PCC are references to Title 17 of the Pima County Code)

1. PERMIT EXPIRATION AND RENEWAL

[PCC 17.11.090.A and PCC 17.12.010.D.1]

- a. This permit is valid for a period of five years from the date of issuance of the permit.
- b. The Permittee shall submit an application for renewal of this permit at least 6 months, but not greater than 18 months prior to the date of permit expiration.

2. COMPLIANCE WITH PERMIT CONDITIONS

[PCC 17.12.040.A.8.a & b]

- a. The Permittee shall comply with all Conditions of this permit including all applicable requirements of Arizona air quality statutes A.R.S. Title 49, Chapter 3, and Pima County air quality rules. Any permit noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.
- b. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the Conditions of this permit.

3. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE

[PCC 17.12.040.A.8.c & PCC 17.12.130]

- a. The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit Condition.
- b. The permit shall be reopened and revised under any of the following circumstances:
 - i. Additional applicable requirements under the Clean Air Act become applicable to a major source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and Conditions has been extended pursuant to PCC 17.12.140.B. Any permit reopening required in accordance with this paragraph shall comply with provisions in PCC 17.12.140 for permit renewal and shall reset the five-year permit term.
 - ii. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Control Officer, excess emissions offset plans shall be deemed to be incorporated into the Class I permit.
 - iii. The Control Officer or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or Conditions of the permit.
 - iv. The Control Officer or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.

- c. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopenings shall, except for reopenings under Condition 3.b.i above, affect only those parts of the permit for which cause to reopen exist. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in Condition 3.b.i above shall not result in the resetting of the five-year permit term.

4. **POSTING OF PERMIT**

[PCC 17.11.060, SIP Rule 222, ARS 49-485]

The Permittee who has been granted an individual permit by PDEQ shall maintain a complete copy of the permit onsite. If it is not feasible to maintain a copy of the permit onsite, the Permittee may request, in writing, to maintain a copy of the permit at an alternate location. Upon written approval by the Control Officer, the Permittee must maintain a complete copy of the permit at the approved alternative location. In addition the machine(s), equipment, device(s), or other article(s) for which the permit has been issued shall be affixed with a unique and clearly visible and accessible identification (ID).

5. **FEE PAYMENT**

[PCC 17.12.040.A.9 & PCC 17.12.220, SIP Reg 24]

The Permittee shall pay fees to the Control Officer pursuant to PCC 17.12.220.

6. **ANNUAL EMISSIONS INVENTORY QUESTIONNAIRE**

[PCC 17.12.160, SIP Rule 623]

- a. When requested by the Control Officer, the Permittee shall complete and submit an annual emissions inventory questionnaire. The questionnaire is due by March 31 or ninety days after the Control Officer makes the inventory form available, whichever occurs later, and shall include emission information for the previous calendar year. These requirements apply whether or not a permit has been issued and whether or not a permit application has been filed.
- b. The questionnaire shall be on a form provided by or approved by the Control Officer and shall include the information required by PCC 17.12.160.

7. **COMPLIANCE CERTIFICATION**

[PCC 17.12.040.A.5 & PCC 17.12.080.A.2]

The Permittee shall submit to the Control Officer a compliance certification that describes the compliance status of the source with respect to each permit Condition. Certifications shall be submitted on the dates and frequency specified in Condition 62.c.

- a. The compliance certification shall include the following:
 - i. Identification of each term or Condition contained in the permit including emission limitations, standards, work practice, or management practices that are the basis of the certification;
 - ii. Identification of the method(s) or other means used by the Permittee for determining the compliance status of the source with each term and Condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under PCC 17.12.040 (A)(3), (monitoring including the related recordkeeping and reporting requirements that verify compliance with the monitoring). If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with § 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information;

- iii. The status of compliance with the terms and Conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means in Condition 7.a.ii above. The certification shall identify each deviation and take it into account in the compliance certification.
 - iv. For emission units subject to 40 CFR 64, the certification shall also identify as possible exceptions to compliance any period during which compliance is required and in which an excursion or exceedance defined under 40 CFR 64 occurred.
 - v. All instances of deviations from permit requirements reported in accordance with Condition 11.b as well as progress reports on all outstanding compliance schedules submitted pursuant to PCC 17.12.080; and
 - vi. Other facts the Control Officer may require to determine the compliance status of the facility.
- b. A copy of all compliance certifications for Class I permits shall also be submitted to the EPA Administrator. The address for the EPA Administrator is:

EPA Region 9 Enforcement Office, 75 Hawthorne St (Air-5), San Francisco, CA 94105

8. ***CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS*** [PCC 17.12.080.A.3]

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required by this permit shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

9. ***INSPECTION AND ENTRY*** [PCC 17.12.080.A.4]

The Permittee shall allow the Control Officer or the authorized representative of the Control Officer upon presentation of proper credentials to:

- a. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the Conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that are required to be kept under the Conditions of the permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and
- e. Record any inspection by use of written, electronic, magnetic and photographic media.

10. ***PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD*** [PCC 17.12.010.D.3]

If this source becomes subject to a standard promulgated by the Administrator pursuant to § 112(d) of the Clean Air Act (Hazardous Air Pollutants), then the Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

11. **EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING** [PCC 17.12.170]a. *Excess Emissions Reporting* [PCC 17.12.170]

i. Excess emissions shall be reported as follows:

(a) The Permittee shall report to the Control Officer any emissions in excess of the limits established by this permit. The report shall be in 2 parts as specified:

(i) Notification by telephone or facsimile within 24 hours of the time the Permittee first learned of the occurrence of excess emissions that includes all available information in Condition 11.a.i.(b) below. The number to call to report excess emissions is **520-724-7400**. The facsimile number to report excess emissions is **520-838-7432**. The e-mail address to report excess emissions is **Air.Permits@pima.gov**.

(ii) Detailed written notification by submission of an excess emissions report within 72 hours of the notification in Condition 11.a.i.(a)(i) above. Notifications should be sent to:

PDEQ Air Program 33 N. Stone Avenue, Suite 700, Tucson, Arizona 85701.
Air.Permits@pima.gov.

(b) The report shall contain the following information:

(i) The identity of each stack or other emission point where the excess emission occurred;

(ii) The magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;

(iii) The time and duration or expected duration of the excess emissions;

(iv) The identity of the equipment from which the excess emissions emanated;

(v) The nature and cause of the emissions;

(vi) If the excess emissions were the result of a malfunction, the steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunctions; and

(vii) The steps that were or are being taken to limit the excess emissions; If the source's permit contains procedures governing source operation during periods of startup or malfunction and the excess emissions resulted from startup or malfunction, a list of the steps taken to comply with the permit procedures.

ii. In the case of continuous or recurring excess emissions, the notification requirements shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in the notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period or changes in the nature of the emissions as originally reported shall require additional notification as provided in Condition 11.a.i above.

b. *Permit Deviations Reporting*

[PCC 17.12.170.A.5.b]

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Prompt reporting shall mean that the report was submitted to the Control Officer by certified mail, facsimile, e-mail (Air.Permits@pima.gov) or hand delivery within two working days of the time when emission limitations were exceeded due to an emergency or within two working days of the time when the Permittee first learned of the occurrence of a deviation from a permit requirement.

c. *Emergency Provision*

[PCC 17.12.170.E]

- i. A "Emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emission attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.
- ii. An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if Condition 11.c.iii below is met.
- iii. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (a) An emergency occurred and that the Permittee can identify the cause or causes of the emergency;
 - (b) At the time of the emergency, the permitted facility was being properly operated;
 - (c) During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and
 - (d) The Permittee submitted notice of the emergency to the Control Officer by certified mail, hand delivery, e-mail (Air.Permits@pima.gov) or facsimile transmission within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.
- iv. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- v. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

d. *Compliance Schedule*

[ARS § 49-480.F.3 & 5]

For any excess emission or permit deviation that cannot be corrected within 72 hours, the Permittee is required to submit a compliance schedule to the Control Officer within 21 days of such occurrence. The compliance schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the permit terms or Conditions that have been violated.

e. *Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown.*

[PCC 17.12.180]

i. *Applicability*

This rule establishes affirmative defenses for certain emissions in excess of an emission standard or limitation and applies to all emission standards or limitations except for standards or limitations:

- (a) Promulgated pursuant to §§ 111 or 112 of the Clean Air Act,
- (b) Promulgated pursuant to Titles IV or VI of the Clean Air Act,
- (c) Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. E.P.A., or
- (d) Included in a permit to meet the requirements of PCC 17.16.590.A.5.

ii. *Affirmative Defense for Malfunctions*

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. The Permittee of a source with emissions in excess of an applicable emission limitation due to malfunction has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner or operator of the source has complied with the reporting requirements in Condition 11.a above and has demonstrated all of the following:

- (a) The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the operator;
- (b) The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
- (c) If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the owner or operator satisfactorily demonstrated that the measures were impracticable;
- (d) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
- (e) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
- (f) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;
- (g) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;
- (h) The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;
- (i) All emissions monitoring systems were kept in operation if at all practicable; and

- (j) The Permittee's actions in response to the excess emissions were documented by contemporaneous records.

iii. *Affirmative Defense for Startup and Shutdown*

- (a) Except as provided in Condition 11.e.iii.(b) below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. The Permittee of a source with emissions in excess of an applicable emission limitation due to startup and shutdown has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner or operator of the source has complied with the reporting requirements of Condition 11.a above and has demonstrated all of the following:
 - (i) The excess emissions could not have been prevented through careful and prudent planning and design;
 - (ii) If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;
 - (iii) The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
 - (iv) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
 - (v) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;
 - (vi) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;
 - (vii) All emissions monitoring systems were kept in operation if at all practicable; and
 - (viii) The Permittee's actions in response to the excess emissions were documented by contemporaneous records.
- (b) If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to Condition 11.e.ii above.

iv. *Affirmative Defense for Malfunctions during Scheduled Maintenance*

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to 11.e.ii above.

v. *Demonstration of Reasonable and Practicable Measures*

For an affirmative defense under Conditions 11.e.ii or iii, the Permittee of the source shall demonstrate, through submission of the data and information required by Conditions 11.e.i through v and Condition 11.a above, that all reasonable and practicable measures within the owner or operator's control were implemented to prevent the occurrence of the excess emissions.

12. RECORDKEEPING REQUIREMENTS

[PCC 17.12.040.A.4]

- a. The Permittee shall keep records of all required monitoring information including recordkeeping requirements established pursuant to PCC 17.12.080, where applicable, for the following:
 - i. The date, place as defined in the permit, and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The name of the company or entity that performed the analyses;
 - iv. A description of the analytical techniques or methods used;
 - v. The results of such analyses; and
 - vi. The operating conditions as existing at the time of sampling or measurement.
- b. The Permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings or other data recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.
- c. All required records shall be maintained using a normal business electronic recordkeeping format or printed records including handwritten forms or logbooks utilizing indelible ink.

13. REPORTING REQUIREMENTS

[PCC 17.12.040.A.5]

The Permittee shall comply with all of the reporting requirements of this permit. These include all of the following:

- a. Compliance certifications in accordance with Condition 7 above.
- b. Excess emissions; permit deviations, and emergency reports in accordance with Condition 11 above.
- c. Performance test results in accordance with Condition 17 below.
- d. Other reports required by any of the Conditions in Part B of this permit.

14. DUTY TO PROVIDE INFORMATION

[PCC 17.12.040.A.8.e, PCC 17.12.010.G, & PCC 17.12.010.H, SIP Rule 621]

- a. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee, for Class I sources, shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.
- b. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, an applicant shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a proposed permit.

15. **PERMIT AMENDMENT OR REVISION**

[PCC 17.12.100, PCC 17.12.110 & PCC 17.12.120]

The Permittee shall apply for a permit amendment or revision for changes to the facilities which do not qualify for a facility change without revision under Condition 16, as follows:

- a. Administrative Permit Amendment (PCC 17.12.100);
- b. Minor Permit Revision (PCC 17.12.110);
- c. Significant Permit Revision (PCC 17.12.120).

The applicability and requirements for such action are defined in the referenced regulations.

16. **FACILITY CHANGES ALLOWED WITHOUT PERMIT REVISIONS**

[PCC 17.12.090]

- a. A facility with a Class I permit may make changes without a permit revision if all of the following apply:
 - i. The changes are not modifications under any provision of Title I of the Clean Air Act (Air Pollution Prevention and Control) or under modifications as defined in A.R.S. 49-401.01;
 - ii. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions;
 - iii. The changes do not violate any applicable requirements or trigger any additional applicable requirements;
 - iv. The changes satisfy all requirements for a minor permit revision under PCC 17.12.110; and
 - v. The changes do not contravene federally enforceable permit terms and Conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements.
- b. The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if the substitution meets all of the requirements of Conditions 16.a, d, and e.
- c. Except for sources with authority to operate under general permits, permitted sources may trade increases and decreases in emissions within the permitted facility, as established in the permit under PCC 17.12.040.A.12 if an applicable implementation plan provides for the emissions trades, without applying for a permit revision and based on the seven working days' notice prescribed in Condition 16.d below. This provision is available if the permit does not provide for the emissions trading as a minor permit revision.
- d. For each change under Conditions 16.a through c above, a written notice, by certified mail or hand delivery, shall be received by the Control Officer and the Administrator a minimum of seven (7) working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided less than 7 working days in advance of the change but must be provided as far in advance of the change, or if advance notification is not practicable as soon after the change as possible.

- e. *Each notification shall include:*
 - i. When the proposed change will occur;
 - ii. A description of the change;
 - iii. Any change in emissions of regulated air pollutants;
 - iv. The pollutants emitted subject to the emissions trade, if any;
 - v. The provisions in the implementation plan that provide for the emissions trade with which the source will comply and any other information as may be required by the provisions in the implementation plan authorizing the trade;
 - vi. If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply; and
 - vii. Any permit term or Condition that is no longer applicable as a result of the change.
- f. The permit shield described in Condition 20 below shall not apply to any change made under this Condition. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the implementation plan authorizing the emissions trade.
- g. Except as otherwise provided for in the permit, making a change from one alternative operating scenario to another as provided under PCC 17.12.040.A11 shall not require any prior notice.
- h. Notwithstanding any other part of this Condition, the Control Officer may require a permit to be revised for any change that when considered together with any other changes submitted by the same source under these provisions over the term of the permit, do not satisfy the requirements in Condition 16.a.

17. **TESTING REQUIREMENTS**

[PCC 17.11.210, SIP Reg 50, SIP Rule 212]

- a. New sources required to conduct performance testing shall do so within 60 days after the source has achieved the capability to operate at its maximum production rate on a sustained basis but no later than 180 days after initial startup of such sources. The Permittee shall conduct performance testing as specified in Part B of this permit and at such other times as may be required by the Control Officer. The Permittee shall furnish the control officer a written report or the results of the tests.
- b. *Operational Conditions*

Performance tests shall be conducted while the unit is operating at full load under representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Control Officer, testing may be performed at a lower rate. Operations during start-up, shutdown, and malfunction (as defined in PCC 17.04.340.A) shall not constitute representative operational conditions unless otherwise specified in the applicable requirement.
- c. Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual, 40 CFR 52; Appendices D and E, 40 CFR 60; Appendices A through F; and 40 CFR 61, Appendices B and C unless modified by the Control Officer pursuant to PCC 17.11.210.B.

d. *Test Plan*

At least 14 calendar days prior to performing a test, the Permittee shall submit a test plan to the Control Officer, in accordance with PCC 17.11.210.D and the Arizona Testing Manual. This test plan must include the test duration, test location(s), test methods, and source operation and other parameters that may affect the test results.

e. *Stack Sampling Facilities*

The Permittee shall provide or cause to be provided, performance testing facilities as follows:

- i. Sampling ports adequate for test methods applicable to the facility;
- ii. Safe sampling platform(s);
- iii. Safe access to sampling platform(s); and,
- iv. Utilities for sampling and testing equipment.

f. *Interpretation of Final Results (Please see Part B of this permit for Specific Conditions applicable to SFPP).*

Unless otherwise identified in Part B of this permit, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the Control Officer's approval, be determined using the arithmetic mean of the results of the other two runs. If the Control Officer or the Control Officer's designee is present, tests may only be stopped with the Control Officer's or such designee's approval. If the Control Officer or the Control Officer's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation, which demonstrates good cause, must be submitted.

g. *Report of Final Test Results*

A written report of the results of all performance tests shall be submitted to the Control Officer within 30 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual and PCC 17.11.210.A. If additional time is needed to submit the results, the Permittee shall send a written request for an extension describing the circumstances and specifying the time needed to submit the report for approval by the Control Officer.

[AZ Testing Manual Page 8 (4 Weeks ~ 30 days)]

18. **PROPERTY RIGHTS**

[PCC 17.12.040.A.8.d]

This permit does not convey any property rights of any sort, or any exclusive privilege to the Permittee.

19. **SEVERABILITY CLAUSE**

[PCC 17.12.040.A.7]

The provisions of this permit are severable. In the event of a challenge to any portion of this permit that results in any provision of this permit being held invalid, the remainder of this permit shall not be affected thereby.

20. **PERMIT SHIELD**

[PCC 17.11.080]

Compliance with the Conditions of this permit shall be deemed compliance with the applicable requirements identified in the permit. The permit shield shall not apply to any change made in accordance with Conditions 15.b and 16 above.

21. **ACCIDENT PREVENTION REQUIREMENTS UNDER THE CLEAN AIR ACT (CAA § 112(r))**

Should this stationary source, as defined in 40 CFR Part 68.3, become subject to the accidental release prevention regulations in Part 68, then the Permittee shall submit a risk management plan (RMP) by the date specified in § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70 and Part B of this permit.

22. **ASBESTOS REQUIREMENTS (Demolition/ Renovation)**

[40 CFR 61, Subpart M]

Should this stationary source, pursuant to 40 CFR 61, Subpart M become subject to the National Emission Standards for asbestos regulations when conducting any renovation or demolition at this premises, then the Permittee shall submit proper notification as described in 40 CFR 61, Subpart M and shall comply with all other applicable requirements of Subpart M. The Permittee shall keep a record of all relevant paperwork on file.

23. **STRATOSPHERIC OZONE DEPLETING SUBSTANCES**

[40 CFR 82 and PCC 17.16.710]

The Permittee shall not use, sell, or offer for sale any fluid as a substitute material for use in any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator or freezer unit, or other cooling or heating device designed to use a chlorofluorocarbon (CFC) or hydrochlorofluorocarbon (HCFC) compound as a working fluid, unless such fluid has been approved for sale and such use by the Administrator. The Permittee shall keep a record of all paperwork relevant to the applicable requirements of 40 CFR 82, Subpart F onsite.

PART B**SPECIFIC CONDITIONS****§ 1 – AUTHORITY, CLASSIFICATION, AND PERMIT ORGANIZATION**

[PCC 17.11.010]

24. *Statutory Authority*

[PCC 17.11.010, 17.11.020, PCC 17.11.090.A, 17.12.010, and ARS § 49-480, SIP Rules 103, 111, 301]

Emissions from the facility, specifically the emissions from the equipment and operations described in the permit application, which fall under SIC Code (4226), are subject to enforceable limitations in the Specific Conditions in this Part B. This permit is issued pursuant to ARS § 49-480 and authorizes the construction and/or operation of the equipment and operations listed in the equipment list in Attachment 3 of this permit. This authorization is based on the regulations in effect on the date of issuance of this permit, and a finding that the allowable emissions from the facility, specifically the emissions from the equipment and operations more fully described in the permit application constitute a “major source” within the meaning of PCC 17.04.340.A.128. Compliance with the Conditions of this permit shall be deemed to be compliant with any applicable requirement and regulation identified in this permit as of the date of issuance. Notwithstanding the above findings, this permit shall not relieve the Permittee nor its subcontractors from compliance with all local or county codes, state statutes and federal laws or from obtaining permits for other operations or activities when required.

25. *Permit Classification*

Class I; Major Source; Categorical – Petroleum storage and transfer facilities > 300,000 barrels; Stationary: The permitted facility sources constitute a major source of VOC, a synthetic minor source of Hazardous Air Pollutants (HAPs), and a true minor source of all other criteria pollutants based on 8760 hours of operation per year and the limitations in this permit and from other sources at the facility aggregated under the same SIC Code (4226).

26. *Permit Sections*

The Specific Conditions in this Part B have been organized into the following permit sections (§§):

§ 1 – Authority, Classification, and Permit Organization (This Section)

§ 2 – Applicability

§ 3 – Emission Limitations and Management Practices

§ 4 – Monitoring Requirements

§ 5 – Recordkeeping Requirements

§ 6 – Reporting Requirements

§ 7 – Testing Requirements

27. *Permit Organization*

The Specific Conditions in this Part B have been organized under the source categories, affected facilities, emission sources, and operations in Conditions 28 through 34 (***Bold Italics***) as they apply to the facility and equipment listed in Attachment 3

28. Sources subject to GD GACT**[Federally Enforceable Conditions]**

40 CFR Part 63, Subpart BBBB – NESHAP for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities: [PCC 17.16.530.B.105]

- a. The affected source is each area source bulk gasoline terminal, pipeline breakout station, pipeline pumping station, and bulk gasoline plant identified in Conditions 28.a through d. The Permittee is subject to the requirements if the Permittee owns or operates one or more of the following affected area sources: [40 CFR 63.11081(a)]
 - i. A bulk gasoline terminal that is not subject to the control requirements of 40 CFR Part 63, Subpart R (40 CFR 63.422, 40 CFR 63.423, and 40 CFR 63.424) or 40 CFR Part 63, Subpart CC (40 CFR 63.646, 40 CFR 63.648, 40 CFR 63.649, and 40 CFR 63.650).
 - ii. A pipeline breakout station that is not subject to the control requirements of 40 CFR Part 63, Subpart R (40 CFR 63.423 and 40 CFR 63.424).
 - iii. A pipeline pumping station.
 - iv. A bulk gasoline plant.
- b. Storage tanks that are used to load gasoline into a cargo tank for the on-site redistribution of gasoline to another storage tank are subject to Condition 28. [40 CFR 63.11081(h)]
- c. For any affected source subject to Condition 28 and another Federal rule, the Permittee may elect to comply only with the more stringent provisions. The Permittee must consider all provisions of the rules, including monitoring, recordkeeping, and reporting. The Permittee must identify the affected source and provisions with which the Permittee will comply in the Permittee’s Notification of Compliance Status required in Condition 56.a. The Permittee must demonstrate in the Notification of Compliance Status that each provision with which the Permittee will comply is at least as stringent as the otherwise applicable requirements. The Permittee is responsible for making accurate determinations concerning the more stringent provisions; noncompliance with Condition 28 above is not excused if it is later determined that the Permittee’s determination was in error, and, as a result, the Permittee is violating Condition 28 above. Compliance with Condition 28 is the Permittee’s responsibility, and the Notification of Compliance Status does not alter or affect that responsibility. [40 CFR 63.11081(i)]
- d. The emission sources to which Condition 28 applies are gasoline storage tanks, gasoline loading racks, vapor collection-equipped gasoline cargo tanks, and equipment and components in vapor or liquid gasoline service that meet the applicable criteria in Condition 35. [40 CFR 63.11082(a)]
 - i. An affected source is a new affected source if the Permittee commenced construction on the affected source after November 9, 2006, and the Permittee meets the applicability criteria in Condition 28 at the time the Permittee commenced operation. [40 CFR 63.11082(b)]
 - ii. An affected source is reconstructed if the Permittee meets the criteria for reconstruction as defined in 40 CFR 63.2. [40 CFR 63.11082(c)]
 - iii. An affected source is an existing affected source if it is not new or reconstructed. [40 CFR 63.11082(d)]
 - iv. For the purpose of Condition 28.d, emission sources owned and operated by the Permittee that are in “Transmix” service or serve to store or handle multiple products that includes gasoline shall be considered an emission source to which Condition 28 applies. [PCC 17.11.190.B]

[Voluntary Accepted Limitation]

- e. If the Permittee has a new or reconstructed affected source, the Permittee must comply with Condition 28 according to the following: [40 CFR 63.11083(a)]
 - i. If the Permittee starts up the affected source before January 10, 2008, the Permittee must comply with the standards in Condition 28 no later than January 10, 2008. [40 CFR 63.11083(a)(1)]
 - ii. If the Permittee starts up the affected source after January 10, 2008, the Permittee must comply with the standards in Condition 28 upon startup of the Permittee's affected source. [40 CFR 63.11083(a)(2)]
- f. If the Permittee has an existing affected source, the Permittee must comply with the standards in Condition 28 no later than January 10, 2011. [40 CFR 63.11083(b)]

29. *NSPS Storage Vessels subject to 40 CFR 60 Subpart K* [Federally Enforceable Conditions]

40 CFR 60, Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978: [PCC 17.16.490.A.17]

- a. Except as provided in Condition 29.b the affected facility to which this subpart applies is each storage vessel for petroleum liquids which has a storage capacity greater than 151,412 liters (40,000 gallons). [40 CFR 60.110(a)]
- b. Condition 29.a does not apply to storage vessels for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer. [40 CFR 60.110(b)]
- c. Subject to the requirements of Condition 29 is any facility under Condition 29.a which: [40 CFR 60.110(c)]
 - i. Has a capacity greater than 151,416 liters (40,000 gallons), but not exceeding 246,052 liters (65,000 gallons), and commences construction or modification after March 8, 1974, and prior to May 19, 1978.
 - ii. Has a capacity greater than 246,052 liters (65,000 gallons) and commences construction or modification after June 11, 1973, and prior to May 19, 1978.
- d. VOC Standard and Cutoff for Controls
 - i. For each storage vessel subject to Condition 29.a, if the true vapor pressure of the petroleum liquid, as stored, is equal to or greater than 78 mm Hg (1.5 psia) but not greater than 570 mm Hg (11.1 psia), the storage vessel shall be equipped with a floating roof, a vapor recovery system, or their equivalents.
 - ii. For each storage vessel subject to Condition 29.a, if the true vapor pressure of the petroleum liquid, as stored, is greater than 570 mm Hg (11.1 psia), the storage vessel shall be equipped with a vapor recovery system or its equivalents.
- e. The following are exempt from monitoring in accordance with Condition 29.a (Cutoff for Monitoring)
 - i. Storage vessels which store petroleum liquids with a Reid vapor pressure of less than 6.9 kPa (1.0 psia) provided the maximum true vapor pressure does not exceed 6.9 kPa (1.0) psia.
 - ii. Storage vessels equipped with a vapor recovery and return or disposal system in accordance with the requirements of Condition 29.d above.

30. *NSPS Storage Vessels subject to 40 CFR 60 Subpart Kb***[Federally Enforceable Conditions]**

40 CFR 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 60.110b(a) & PCC 17.16.490.A.17]

- a. Except as provided in Condition 30.c, the affected facility to which Condition 30 applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m³) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.
[40 CFR 60.110b (a)]
- b. *Cutoff for Controls*
- i. For each storage vessel with a design capacity greater than 151 m³ (39,890 gallons, 950 barrels) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa; or;
- ii. For each storage vessel with a design capacity greater than or equal to 75 m³ (19,813 gallons, 472 barrels) but less than 151 m³ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa;
- (a) The Permittee shall equip each storage vessel as specified in Condition 30.b.i or ii with one of the control technologies specified in Condition 37, or alternate equivalent in accordance with 40 CFR 60.114b.
[40 CFR 60.112b(a)]
- iii. For each storage vessel with a design capacity greater than or equal to 75 m³ which contains a VOL that, as stored, has a maximum true vapor pressure greater than or equal to 76.6 kPa;
- (a) The Permittee shall equip the storage vessel with a closed vent system and control device as specified in Condition 37.c or an alternate equivalent in accordance with 40 CFR 60.114b.
[40 CFR 60.112b(b)]
- c. *Cutoff for Monitoring.*

Condition 30 does not apply to the following:

[40 CFR 60.110b(b), 40 CFR 60.110b(d)(4)]

- i. Storage vessels with a capacity greater than 151 m³ and storing a liquid with a maximum true vapor pressure less than 3.5 kPa; or
- ii. Storage vessels with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15 kPa; or
[40 CFR 60.110b(b)]
- iii. Vessels with a design capacity less than or equal to 1,589.874 m³ used for petroleum or condensate stored, processed, or treated prior to custody transfer.
[40 CFR 60.110b(d)(4)]

31. *Non-NSPS Storage Vessels and Equipment***[Federally & Locally Enforceable Conditions]**

Standards of Performance for Storage Vessels for Petroleum Liquids applies to the following:

[SIP Rule 314 & PCC 17.16.230]

- a. Each petroleum liquid storage tank
[PCC 17.16.230.A and B]
- b. All facilities for dock loading of petroleum products, having a vapor pressure of 1.5 pounds per square inch or greater at loading pressure.
[PCC 17.16.230.C]
- c. All pumps and compressors which handle volatile organic compounds.
[PCC 17.16.230.D]

32. *NSPS Loading Racks***[Federally Enforceable Conditions]**

40 CFR 60, Subpart XX – Standards of Performance for Bulk Gasoline Terminals:

[40 CFR 60.500 & PCC 17.16.490.A.55]

- a. The affected facility is the total of all the loading racks at a bulk gasoline terminal which deliver liquid product into gasoline tank trucks. [40 CFR 60.500(a)]
- b. Each facility under Condition 32.a, the construction or modification of which is commenced after December 17, 1980. [40 CFR 60.500(b)]
- c. Any replacement of components of an existing facility, described in Condition 32.a, that commenced before August 18, 1983 in order to comply with any emission standard adopted by a State or political subdivision thereof will not be considered a reconstruction under the provisions of 40 CFR 60.15. [40 CFR 60.500(c)]

33. *Air Pollution Control Equipment***[Federally Enforceable & Material Permit Conditions]**

40 CFR 64 - Compliance Assurance Monitoring:

[40 CFR Part 64 & PCC 17.12.040.A.3.b]

- a. Compliance assurance monitoring is intended to provide a reasonable assurance of compliance with applicable requirements for large emission units that rely on air pollution control equipment to achieve compliance with an emissions limit or standard. The requirements of 40 CFR Part 64 - Compliance Assurance Monitoring (CAM) applies to pollutant specific emission units (PSEU's) at a major source that satisfy all of the following criteria:
 - i. The PSEU is located at a major source for which a Title V permit is required;
 - ii. The PSEU is subject to an emissions limitation or standard for a regulated pollutant
 - iii. The PSEU uses a control device to achieve compliance
 - iv. The PSEU has potential pre-control emissions of the regulated air pollutant that are 100% of the major source level.
 - v. The PSEU is not otherwise exempt from CAM.
- b. The following air pollution control devices at the facility have been identified as PSEU's subject to Condition 33 and are required to be monitored in accordance with the approved CAM plans under Attachment 2. Should the Permittee be required to submit the information required in 40 CFR 64.4 after the deadline set forth in 40 CFR 64.5(a)(1), the Permittee shall submit the monitoring information required (i.e. proposed CAM Plan) as part of the application for renewal of this permit. Prior to the approval of a CAM Plan, the Permittee shall be subject to the monitoring and related recordkeeping and reporting requirements in Conditions 42.a, 46, 49.d, 53, 55.a, 56, and 62, as applicable. [40 CFR 64.4 through 40 CFR 64.6]
 - i. Applicable to the John Zink Thermal Oxidizer (TO) that controls the emission of VOC from loading racks LR-1, LR-2 LR-3, LR-4, LR-6 and the refilling of drain dry tanks T-6, T-7, T-8, T-14, and T-25.
 - ii. Applicable to the John Zink Vapor Recovery (carbon adsorption) System (VRS) that controls the emission of VOC from loading rack LR-5.
 - iii. Applicable to the NAO Thermal Oxidizer (TO) that controls the emission of VOC from loading rack LR-6 when used as an alternate control device as provided in Condition 40.c.

34. **Facility-Wide Operations**

[PCC 17.11.190.B & PCC 17.16.010 through 100]

[Federally and Locally Enforceable Conditions]

Applicable to the facility, and facility-wide operations including facility-wide (synthetic) operational limitations, general provisions, odor limiting standard, opacity limit, visibility limiting standard, and fugitive dust standards.

§ 3 – EMISSION LIMITATIONS AND MANAGEMENT PRACTICES

[PCC 17.12.040.A.2]

35. **Sources Subject to GD GACT****[Federally Enforceable Conditions]**

The following provisions are applicable to the affected emission sources in Condition 28.d and equipment identified in Attachment 3, Tables 1- 5 of this permit. [40 CFR 63.11085 & PCC 17.16.530.B.105]

a. *General Duty to Minimize Emissions*

The Permittee must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Control Officer, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.11085(a)]

b. *Gasoline Storage Tank Requirements*

The Permittee must meet each emission limit and management practice that applies to the Permittee's gasoline storage tanks as follows: [40 CFR 63.11087(a)]

i. For each gasoline storage tank with a capacity less than 75 cubic meters (19,813 gallons, 472 bbl); or for each gasoline storage tank with a capacity of less than 151 cubic meters (39,890 gallons, 950 bbl) and a throughput of 480 gallons per day or less the Permittee must:

(a) Equip each gasoline storage tank with a fixed roof that is mounted to the storage tank in a stationary manner, and maintain all openings in a closed position at all times when not in use. [40 CFR 63.11087(a), Table 1, (1)]

ii. For each gasoline storage tank with a capacity greater than or equal to 75 cubic meters (19, 813 gallons, or 472 bbl) the Permittee must do the following: [40 CFR 63.11087(a), Table 1(2a-d)]

(a) Reduce emissions of total organic HAP or total organic compounds (TOC) by 95 weight-percent with a closed vent system and control device, as specified in Condition 37.c; or

(b) Equip each internal floating roof gasoline storage tank according to the requirements in Condition 37.a, except for the secondary seal requirements in Condition 37.a.ii.(b) and the requirements in Conditions 37.a.iv through ix; and;

(c) Equip each external floating roof gasoline storage tank according to the requirements in Condition 37.b, except that the requirements of Condition 37.b.ii shall only be required if such storage tank does not currently meet the requirements in Condition 37.b; or

(d) Alternately equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in 40 CFR 63.1063 as specified in item (d) in Table 1 of Subpart BBBB of 40 CFR Part 63.

- iii. The Permittee must comply with the requirements by the applicable dates specified in Condition 28.e and f. Except that storage vessels equipped with floating roofs and not meeting the requirements of Condition 35.b.ii must be in compliance at the first degassing and cleaning activity after January 10, 2011 or by January 10, 2018 whichever is first. [40 CFR 63.11087(b)]
- iv. The Permittee must comply with the applicable testing and monitoring requirements specified in Condition 42.b. [40 CFR 63.11087(c)]
- v. The Permittee must submit the applicable notifications as required in Condition 56.a. [40 CFR 63.11087(d)]
- vi. The Permittee must keep records and submit reports as specified in Conditions 49 and 56. [40 CFR 63.11087(e)]
- vii. If the Permittee's gasoline storage tank(s) is subject to, and complying with, the control requirements of Condition 37, the storage tank will be deemed in compliance with Condition 35.b. The Permittee must report this determination in the Notification of Compliance Status Report required under Condition 56.a.ii. [40 CFR 63.11087(f)]
[See Notification of Compliance Status Report dated January 10, 2011]

c. *Gasoline Loading Racks Requirements*

- i. For each bulk gasoline terminal loading rack(s) with a gasoline throughput (total of racks) of 250,000 gallons per day, or greater, the Permittee must meet the following emission limits and management practices: [40 CFR 63.11088(a), Table 2, Item 1]
 - (a) Equip the loading racks with a vapor collection system designed to collect the TOC vapors displaced from cargo tanks during product loading; and [40 CFR 63.11088(a), Table 2(1a)]
 - (b) Reduce emissions of TOC to less than or equal to 35 mg/l of gasoline loaded into gasoline cargo tanks at the loading rack; and [40 CFR 63.11088(a), Table 2(1b)]
 - (c) Design and operate the vapor collection system to prevent any TOC vapors collected at one loading rack or lane from passing through another loading rack or lane to the atmosphere; and [40 CFR 63.11088(a), Table 2(1c)]
 - (d) Limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in Conditions 39.d through h and 46. The term "tank truck" as used in Conditions 39.d through h and 46 means "cargo tank". *Gasoline cargo tank* means a delivery tank truck or railcar which is loading gasoline or which has loaded gasoline on the immediately previous load. [40 CFR 63.11088(a), Table 2(1d), 40 CFR 63.11100]
- ii. The Permittee must comply with the requirements by the applicable dates specified in Conditions 28.e and f [40 CFR 63.11088(c)]
- iii. The Permittee must comply with the testing and monitoring requirements in Conditions 63 and 42. [40 CFR 63.11088(d)]
- iv. The Permittee must submit the notifications as required in Condition 56.a. [40 CFR 63.11088(e)]
- v. The Permittee must keep records and submit reports as specified in Conditions 49 and 56. [40 CFR 63.11088(f)]

d. *Equipment Leak Inspection Requirements*

- i. The Permittee shall perform a monthly leak inspection of all equipment in gasoline service, (*equipment used to transfer gasoline or gasoline vapors*). For this inspection, detection methods incorporating sight, sound, and smell are acceptable. [40 CFR 63.11089(a)]
- ii. The Permittee shall use and sign a log book at the completion of each inspection. A section of the log book shall contain a list, summary description, or diagram(s) showing the location of all equipment in gasoline service at the facility. [40 CFR 63.11089(b)]
- iii. The Permittee shall record each detection of a liquid or vapor leak in the log book. When a leak is detected, an initial attempt at repair shall be made as soon as practicable, but no later than 5 calendar days after the leak is detected. Repair or replacement of leaking equipment shall be completed within 15 calendar days after detection of each leak, except as provided in Condition 35.d.iv. [40 CFR 63.11089(c)]
- iv. Delay of repair of leaking equipment will be allowed if the repair is not feasible within 15 days. The Permittee shall provide in the semiannual report specified in Condition 56.b the reason(s) why the repair was not feasible and the date each repair was completed. [40 CFR 63.11089(d)]
- v. The Permittee must comply with the requirements by the applicable dates specified in Conditions 28.e and f. [40 CFR 63.11089(e)]
- vi. The Permittee must submit the applicable notifications as required in Condition 56.a. [40 CFR 63.11089(f)]
- vii. The Permittee must keep records and submit reports as specified in Conditions 49 and 56. [40 CFR 63.11089(f)]

36. *NSPS Storage Vessels Subject to 40 CFR 60 Subpart K***[Federally Enforceable Conditions]**

The following provisions are applicable to affected facilities in Condition 29 and equipment identified in Attachment 3, Table 2. If the storage vessel is a gasoline storage tank subject to Condition 35.b.ii, the more stringent standard or emission limit shall apply. [PCC 17.16.010 & PCC 17.16.490.A.15 &16]

- a. The Permittee shall equip the tank with a fixed roof with a floating roof, a vapor recovery system, or their equivalents. [40 CFR 60.112(a)(1)]

[Material Permit Condition]37. *NSPS Storage Vessels Subject to 40 CFR 60 Subpart Kb***[Federally Enforceable Conditions]**

The following provisions are applicable to affected facilities in Condition 30 and equipment listed in Attachment 3, Table 3. If the storage vessel is a gasoline storage tank subject to Condition 35b.ii, the more stringent emission standard or emission limit shall apply. [PCC 17.16.010 & PCC 17.16.490.A.16]

The Permittee shall equip each storage vessel with one of the following:

- a. *An internal floating roof (IFR)*: A fixed roof in combination with an internal floating roof meeting the following specifications: [40 CFR 60.112b(a)(1)]
 - i. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [40 CFR 60.112b(a)(1)(i)]

- ii. Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof: [40 CFR 60.112b(a)(1)(ii)]
- (a) A foam or liquid-filled seal mounted in contact with the liquid (liquid-mounted-seal). A liquid mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank. [40 CFR 60.112b(a)(1)(ii)(A)]
 - (b) Two seals mounted one the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. [40 CFR 60.112b(a)(1)(ii)(B)]
 - (c) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. [40 CFR 60.112b(a)(1)(ii)(C)]
- iii. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [40 CFR 60.112b(a)(1)(iii)]
- iv. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR 60.112b(a)(1)(iv)]
- v. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [40 CFR 60.112b(a)(1)(v)]
- vi. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [40 CFR 60.112b(a)(1)(vi)]
- vii. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR 60.112b(a)(1)(vii)]
- viii. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR 60.112b(a)(1)(viii)]
- ix. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)]
- b. *An external floating roof (EFR):* An external floating roof means a pontoon-type or double-deck type cover that rests on the liquid surface in a vessel with no fixed roof. Each external floating roof must meet the following specifications: [40 CFR 60.112b(a)(2) & PCC 17.11.120.A.3.d]
- [Material Permit Conditions]**
- i. Each external floating roof shall be equipped with a closure device between the wall of the storage vessel and the roof edge. The closure device is to consist of two seals, one above the other. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal. [40 CFR 60.112b(a)(2)(i)]
 - (a) The primary seal shall be either a mechanical shoe seal or a liquid-mounted seal. Except as provided in Condition 44.b.iv.(a), the seal shall completely cover the annular space between the edge of the floating roof and tank wall. [40 CFR 60.112b(a)(2)(i)(A)]

- (b) The secondary seal shall completely cover the annular space between the external floating roof and the wall of the storage vessel in a continuous fashion except as allowed in Condition 44.b.iv.(b). [40 CFR 60.112b(a)(2)(i)(B)]
- ii. Except for automatic bleeder vents and rim space vents, each opening in a noncontact external floating roof shall provide a projection below the liquid surface. Except for automatic bleeder vents, rim space vents, roof drains, and leg sleeves, each opening in the roof is to be equipped with a gasketed cover, seal, or lid that is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. Rim vents are to be set to open when the roof is being floated off the roof legs supports or at the manufacturer's recommended setting. Automatic bleeder vents and rim space vents are to be gasketed. Each emergency roof drain is to be provided with a slotted membrane fabric cover that covers at least 90 percent of the area of the opening. [40 CFR 60.112b(a)(2)(ii)]
- iii. The roof shall be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. [40 CFR 60.112b(a)(2)(iii)]
- c. *A closed vent system:* A closed vent system and control device meeting the following specifications: [40 CFR 60.112b(a)(3) & PCC 17.11.120.A.3.d]
[Material Permit Conditions]
- i. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm background and visual inspections, as determined in 40 CFR, Part 60, Subpart VV, 60.485(b). [40 CFR 60.112b(a)(3)(i)]
- ii. The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. [40 CFR 60.112b(a)(3)(ii)]
- d. For each storage vessel with a design capacity greater than or equal to 75 m³ which contains a VOL that, as stored, has a maximum true vapor pressure greater than 76.6 kPa (11.1 psi), the Permittee shall equip each storage vessel as specified in Condition 37.c above or with an equivalent system as provided in 40 CFR 60.114b. [40 CFR 60.112b(b) & PCC 17.11.120.A.3.d]
[Material Permit Condition]

38. *Non-NSPS Storage Vessels and Equipment*

[Locally Enforceable Conditions]

The following provisions are applicable to the affected facilities in Condition 31 and equipment identified in Attachment 3, Table 1, excluding sources subject to Conditions 29 or 30. If the storage vessel or equipment is subject to Condition 28, the more stringent standard or emission limit shall apply.

[PCC 17.16.010, PCC 17.16.130.A & PCC 17.16.230]

- a. The Permittee shall not place, store, or hold in any reservoir, stationary tank or other container having a capacity of forty thousand gallons (one hundred fifty-one thousand four hundred liters) or more any petroleum liquid having a vapor pressure of 1.5 pounds per square inch absolute or greater under actual storage conditions, unless such tank, reservoir, or other container is a pressure tank maintaining working pressure sufficient at all times to prevent hydrocarbon vapor or gas loss to the atmosphere or is equipped with one of the following vapor loss control devices, properly installed, in operation, and in good working order:

[PCC 17.16.230.A & PCC 17.11.120.A.3.d]

[Material Permit Conditions]

- i. A floating roof consisting of a pontoon type double-deck type roof resting on the surface of the liquid contents and equipped with a closure seal to close the space between the roof eave and tank wall and a vapor balloon or vapor dome, designed in accordance with accepted standards of the petroleum industry. The control equipment shall not be used if the petroleum liquid has a vapor pressure of twelve pounds per square inch absolute or greater under actual conditions. [PCC 17.16.230.A.1]
 - (a) All tank gauging and sampling devices shall be gas tight except when gauging or sampling is taking place.
 - (b) Automatic bleeder vents shall be closed at all times, except when the roof is floated off or landed on the roof leg supports.
 - (c) Rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports, or at the manufacturer's recommended setting.
- ii. Other equipment proven to be of equal efficiency for preventing discharge of hydrocarbon gases and vapors to the atmosphere. [PCC 17.16.230.A.2]
- b. Emissions of hydrocarbons from a stationary tank, reservoir, or other container having a capacity greater than 40,000 gallons which is used for storing gasoline or other petroleum liquids must be minimized by applying and maintaining the following controls: [SIP Rule 314.A.2 & PCC 17.11.120.A.3.d]
 - [Federally Enforceable & Material Permit Conditions]**
 - i. An adequately maintained floating roof, refrigeration-type vapor recovery system or equivalently effective control system, if the container is used for storage of a petroleum liquid which has a vapor pressure of at least 1.5 pounds but less than 11 pounds per square inch absolute under actual storage conditions; or
 - ii. A refrigeration-type vapor recovery system or equivalent if the container is used for storage of a petroleum liquid which has a vapor pressure of greater than or equal to 11 pounds per square inch absolute under actual storage conditions.
 - c. If a refrigeration-type vapor recovery system or equivalent is employed, it must be capable of collecting at least 90 percent of the hydrocarbon vapors by weight which would otherwise be vented to the atmosphere during filling of the tank. The system must also be equipped with either an on-site or remotely located vapor-disposal system which processes the vapors so that their escape to the atmosphere is prevented. [SIP Rule 314.B & PCC 17.11.120.A.3.d]
 - [Federally Enforceable & Material Permit Condition]**
 - d. Any other petroleum liquid storage vessel shall be equipped with a submerged filling device, or acceptable equivalent, for the control of hydrocarbon emissions. [PCC 17.16.230.B, PCC 17.16.520, SIP Rule 314.A.1 & PCC 17.11.120.A.3.d]
 - [Federally Enforceable & Material Permit Condition]**
 - e. All pumps and compressors which handle volatile organic compounds shall be equipped with mechanical seals or other equipment of equal efficiency to prevent the release of organic contaminants into the atmosphere. [PCC 17.16.230.D & PCC 17.11.120.A.3.d]
 - [Material Permit Condition]**
 - f. All facilities for dock loading of petroleum products having a vapor pressure of 1.5 pounds per square inch at loading pressure shall provide for submerged filling or acceptable equivalent for control of hydrocarbon emissions. [PCC 17.16.230.C & PCC 17.11.120.A.3.d]
 - [Material Permit Condition]**

- g. The Permittee shall exclusively store the allowable products listed in Tables I through III of Attachment 3. Should the Permittee desire to store other products with greater emissions, the appropriate revision shall be submitted pursuant to PCC 17.12.090, PCC 17.12.110, or PCC 17.12.120. Switching between allowable products (products with lower vapor pressures than those products specified) shall not require notification; however, the Permittee shall update records required by Conditions 49, 50, 51, and 52.

[PCC 17.11.190.B & PCC 17.11.120.A.3.d]

[Federally Enforceable & Material Permit Condition]

39. ***NSPS Loading Racks***

[PCC 17.16.010 & PCC 17.16.490.A.40 & PCC 17.11.120.A.3.d]

[Federally Enforceable & Material Permit Conditions]

The following provisions are applicable to the affected facilities in Condition 32 and equipment identified in Attachment 3, Table 4. If the loading rack(s) is a gasoline loading rack subject to Condition 35.c.i, the more stringent emission standard or emission limit shall apply.

- a. The Permittee shall equip each affected loading rack with a vapor collection system designed to collect the total organic compounds (TOC) vapors displaced from tank trucks during product loading. [40 CFR 60.502(a)]
- b. The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks shall not exceed 35 milligrams of TOC per liter of gasoline loaded. [40 CFR 60.502(b)]
- c. Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. [40 CFR 60.502(d)]
- d. Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks. [40 CFR 60.502(e)]
- e. The Permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [40 CFR 60.502(f)]
- f. The Permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. [40 CFR 60.502(g)]
- g. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in Condition 62.d. [40 CFR 60.502(h)]
- h. No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [40 CFR 60.502(i)]

40. ***Air Pollution Control Equipment***

[Federally Enforceable & Material Permit Conditions]

[PCC 17.11.120.A.3.d]

The following provisions are applicable to the affected facilities in Condition 33 and the air pollution control equipment identified in Attachment 3, Table 5.

- a. *John Zink Thermal Oxidizer*. The Permittee shall capture and route all TOC vapors from the loading racks LR-1, LR-2, LR-3, LR-4, and LR-6 and from the refloating of the roofs for the terminal drain dry tanks T-6, T-7, T-8, T-14 and T-25 to the John Zink Thermal Oxidizer to control VOC and HAP emissions to the atmosphere. [40 CFR 60.502(a) & PCC 17.11.190.B]

- b. *John Zink Vapor Recovery System.* The Permittee shall capture and route all TOC vapors from the loading rack LR-5 to the John Zink Vapor Recovery System to control VOC and HAP emissions to the atmosphere. [40 CFR 60.502(a) & PCC 17.11.190.B]
- c. *NAO Thermal Oxidizer.* As an alternate operating scenario, the Permittee shall capture and route all TOC vapors from LR-6 to the NAO Thermal Oxidizer to control VOC and HAP emissions. The Permittee shall document the dates LR-6 is following the alternate operating scenario with written entries in a log book or other permanent form of record. [40 CFR 60.502(a) & PCC 17.11.190.B]
- d. The Permittee shall operate and maintain the air pollution controls according to the manufacturer's recommendations. Emissions from the applicable units shall not bypass the air pollution controls. If the manufacturer's recommendations are not available, the Permittee shall develop and propose an Operations and Maintenance Plan for the air pollution controls for approval by the Control Officer.

[See Manufacturer's recommendations for the John Zink Thermal Oxidizer submitted May 9, 2008]
 [See O & M Plan for the John Zink Carbon Adsorption Unit submitted September 15, 2015]

41. **Facility-Wide Operations**

The following provisions are applicable to facility-wide operations as provided in Condition 34.

- a. *Operational Limitations* **[Federally Enforceable and Material Permit Conditions]**
 [PCC 17.11.120.A.3]
- i. The Permittee shall limit the combined throughput of all products through all loading racks not to exceed 1.36 billion gallons in any 12-month rolling period. [PCC 17.11.190.B]
- ii. The Permittee shall limit the combined throughput of gasoline through loading rack LR-5 not to exceed 120 million gallons (including oxygenate and additives) in any 12-month rolling period. [PCC 17.11.190.B]
- iii. The Permittee shall limit the combined throughput of gasoline through loading rack LR-6 not to exceed 240 million gallons (including oxygenate and additives) in any 12-month rolling period. [PCC 17.11.190.B]
- iv. The Permittee shall not use or handle reformulated or oxygenated gasoline containing MTBE. Should the Permittee desire to use reformulated or oxygenated gasoline containing MTBE, the appropriate revision shall be submitted pursuant to PCC 17.12.090, PCC 17.12.110, or PCC 17.12.120. [PCC 17.11.190.B]
- v. The Permittee shall limit the total number of turnovers for each of the terminal drain dry tanks not to exceed 150 turnovers in any 12-month rolling period. [PCC 17.11.190.B]
- vi. The Permittee shall limit the operating hours of the onsite portable thermal oxidizer not to exceed 293 annual operating hours. [PCC 17.11.190.B]

b. *VOC Handling*

The Permittee shall not transport or store VOCs without taking necessary and feasible measures to control evaporation, leakage, or other discharge into the atmosphere. [PCC 17.16.400.A]

[Locally Enforceable Condition]

c. *Noncompliance with applicable standards*

- i. The Permittee shall not cause or permit the planning, construction, installation, erection, modification, use, or operation of an emission source which will cause or contribute to a violation of a performance standard in this permit. [SIP Rule 302 & PCC 17.16.020.A]

[Federally Enforceable Condition]

- ii. Where a stack, vent or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor or any combination thereof constituting air pollution are discharged to adjoining property, the Control Officer may require the installation of abatement equipment or the alteration of such stack, vent or other outlet by the owner or operator thereof to a degree that will adequately reduce or eliminate the discharge of air pollution to adjoining property. [PCC 17.16.020.B]

[Locally Enforceable Condition]

d. *Odor Limiting Standard*

The Permittee shall not emit gaseous or odorous materials from equipment, operations, or premises under the Permittee's control in such quantities or concentrations as to cause air pollution.

[SIP 344, PCC 17.16.030 & PCC 17.16.430]

[Federally Enforceable Condition]

e. *Opacity Limit*

[SIP Rule 321, PCC 17.16.040, PCC 17.16.050.B, & PCC 17.16.130.B.1]

Except as otherwise specified in this permit, the opacity of all plumes and effluents from all point, non-point, or fugitive emissions sources shall not exceed 20% as determined by EPA Reference Method 9, Appendix A 40 CFR 60. **[Federally Enforceable Condition]**

[This Condition is only federally enforceable when opacity is greater than 40%]

f. *Visibility Limiting Standard*

- i. The Permittee shall not cause, suffer, allow or permit operations or activities likely to result in excessive amounts of airborne dust without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. [PCC 17.16.050.A]

[Locally Enforceable Condition]

- ii. The Permittee shall not cause, suffer, allow, or permit diffusion of visible emissions, including fugitive dust, beyond the property boundary line within which the emissions become airborne, without taking reasonably necessary and feasible precautions to control generation of airborne particulate matter. Sources may be required to cease temporarily the activity or operation which is causing or contributing to the emissions until reasonably necessary and feasible precautions are taken.

[SIP Rule 343 & PCC 17.16.050.D]

[Federally Enforceable Condition]

- (a) Condition 41.f.ii shall not apply when wind speeds exceed twenty-five (25) miles per hour (using the Beaufort Scale of Wind-Speed Equivalents, or as recorded by the National Weather Service). This exception does not apply if control measures have not been taken or were not commensurate with the size or scope of the emission source. [SIP Rule 343 & PCC 17.16.050.D]

[Federally Enforceable Condition]

- (b) Condition 41.f.ii shall not apply to the generation of airborne particulate matter from undisturbed land. [PCC 17.16.050.D]

[Locally Enforceable Condition]

g. *Authorization for Fugitive Dust Activity*

- i. The Permittee is responsible for controlling windblown dust, dust from haul roads, and dust emitted from land clearing, earthmoving, demolition, trenching, blasting, road construction, mining, racing event, and other activities to ensure compliance with Condition 41.e and f.

[SIP Rule 224, PCC 17.16.060 & PCC 17.14.040.F]

[Federally Enforceable Condition]

- (a) Until the area becomes permanently stabilized by paving, landscaping or otherwise, dust emissions shall be controlled by applying adequate amounts of water, chemical stabilizer, or other effective dust suppressant.
 - (b) The Permittee shall not leave land in such a state that fugitive dust emissions (including windblown dust or dust caused by vehicular traffic on the area) would violate Conditions 41.e or f.
- ii. Condition 41.g shall not relieve the Permittee, nor its subcontractors, from compliance with all local or county codes, state statutes, and federal laws, or from obtaining permits for other operations or activities when required. [PCC 17.11.010]

[Locally Enforceable Condition]

h. *Fugitive Dust Emissions*

[PCC 17.16.070 through PCC 17.16.110]

i. *Motor Vehicle Operations*

[Locally Enforceable Condition]

The Permittee shall not cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, trucks, cars, cycles, bikes, or buggies, or by animals such as horses, without taking reasonable precautions to limit excessive amounts of particulates from becoming airborne. Dust shall be kept to a minimum by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means. [SIP Rule 318.C & PCC 17.16.070]

ii. *Vacant Lots and Open Spaces*

[Federally Enforceable Conditions]

(a) The Permittee shall not cause, suffer, allow, or permit a building or its appurtenances, or a building or subdivision site, or a driveway, or a parking area, or a vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, without taking reasonable precautions to limit excessive amounts of particulate matter from becoming airborne. Dust and other types of air contaminants shall be kept to a minimum by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means. [SIP Rule 318.A. & PCC 17.16.080.A]

(b) The Permittee shall not use or leave a vacant lot, housing plot, building site, parking area, sales lot, playground, livestock feedlot, or other open area other than those used solely for soil-cultivation or vegetative crop-producing and harvesting agricultural purposes in such a state, after construction, alteration, clearing, leveling, or excavation that naturally induced wind blowing over the area causes a violation of Conditions 41.e or f. Dust emissions must be permanently suppressed by landscaping, covering with gravel or vegetation, paving, or applying equivalently effective controls. [SIP Rule 318.B & PCC 17.16.080.B]

(c) The Permittee shall not allow a vacant lot, parking area, sales lot, or other open urban area to be used by motor vehicles in such a manner that visible dust emissions induced by vehicular traffic on the area cause a violation of Conditions 41.e or f. [SIP Rule 318.C & PCC 17.16.080.C]

iii. *Roads and Streets*

[PCC 17.16.090, SIP Rule 315 & 316]

[Federally Enforceable Conditions]

(a) The Permittee shall not construct a new unpaved service road or unpaved haul road unless dust will be suppressed after construction by intermittently watering, limiting access, or applying chemical dust suppressants to the road, in such a way that visible dust emissions caused by vehicular traffic on the road do not violate Conditions 41.e or f. [SIP Rule 315.D & PCC 17.16.090.D]

- (b) The Permittee shall not cause, suffer, allow or permit transportation of materials likely to give rise to airborne dust without taking reasonable precautions, such as wetting, applying dust suppressants, or covering the load, to prevent particulate matter from becoming airborne. Earth or other material that is deposited by trucking or earth moving equipment shall be removed from paved streets by the person responsible for such deposits. [PCC 17.16.090.G, SIP Rules 316.C & 315.D]

iv. *Particulate Materials*

[PCC 17.16.100, SIP Rule 316]

[Federally Enforceable Conditions]

- (a) The Permittee shall not cause, suffer, allow or permit crushing, screening, handling, transporting or conveying of materials or other operations likely to result in significant amounts of airborne dust without taking reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods to prevent excessive amounts of particulate matter from becoming airborne. [SIP Rule 316 A & D]
- (b) Dust emission from the transportation of materials shall be effectively controlled by covering stock loads in open-bodied trucks, limiting vehicular speeds, or other equivalently effective controls. [SIP Rule 316.C]
- (c) Emissions from a sandblasting or other abrasive blasting operation shall be effectively controlled by applying water to suppress visible emissions (wet blasting), enclosing the operation, or use of other equivalently effective controls. [SIP Rule 316.E]

v. *Storage Piles*

[PCC 17.16.110]

[Locally Enforceable Conditions]

- (a) The Permittee shall not cause, suffer, allow, or permit organic or inorganic dust producing material to be stacked, piled or otherwise stored without taking reasonable precautions such as chemical stabilization, wetting, or covering to prevent excessive amounts of particulate matter from becoming airborne.
- (b) Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such manner, or with the use of spray bars and wetting agents, as to minimize and control to ensure compliance with Conditions 41.e and f.

§ 4 – MONITORING REQUIREMENTS

[PCC 17.12.040.A.3]

42. *Sources Subject to GD GACT*

[Federally Enforceable Conditions]

The following provisions are applicable to the affected emissions sources in Conditions 28.d and 33.b and equipment listed in Attachment 3, Tables 1-5. [PCC 17.16.530.B.105]

a. *Gasoline Loading Racks*

The Permittee must comply with the following requirements:

[40 CFR 63.11092(a)]

- i. Permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous monitoring system (CMS), while gasoline vapors are displaced to the vapor processor systems described in Condition 33.b, and as specified in Condition 42.a.i.(a) through (c) as stated below. For each facility conducting a performance test under Condition 63.a and for each facility utilizing the provisions of Condition 63.b, the Permittee must install the CMS by January 10, 2011. [40 CFR 11092(b)]

- (a) For each performance test conducted under Condition 63.a, the Permittee shall determine a monitored operating parameter value for the vapor processing systems using the following procedures. During the performance test, continuously record the operating parameter as follows: [40 CFR 63.11092(b)(1)]
- (i) For the carbon adsorption system in Condition 33.b.ii, the Permittee shall monitor the operation of the system by installing a continuous emissions monitoring system (CEMS) capable of measuring organic compound concentration in the exhaust air stream. [40 CFR 63.11092(b)(1)(i)(A)]
- (ii) For the thermal oxidation system in Condition 33.b.i, the Permittee shall monitor the operation of the system by installing a continuous parameter monitoring system (CPMS) capable of measuring temperature in the firebox or in the ductwork immediately downstream from the firebox in a position before any substantial heat exchange occurs. [40 CFR 63.11092(b)(1)(iii)(A)]
- (iii) For the thermal oxidation system in Condition 33.b.iii, the Permittee shall monitor the presence of a thermal oxidation system pilot flame using a heat sensing device, such as an ultraviolet beam sensor or a thermocouple, installed in the proximity of the pilot light, to indicate the presence of a flame. The heat sensing device shall send a positive parameter value to indicate that the pilot flame is on, or a negative parameter value to indicate that the pilot flame is off. [40 CFR 63.11092(b)(1)iii(B)(1)]
- (A) Develop and submit to the Control Officer a monitoring and inspection plan for the thermal oxidation system in Condition 33.b.iii that describes the Permittee's approach for meeting the following: [40 CFR 63.11092(b)(1)(iii)(B)]
- (1) The thermal oxidation system must be equipped to automatically prevent gasoline loading operations from beginning at any time that the pilot flame is absent.
 - (2) The Permittee shall verify, during each day of operation of the loading rack, the proper operation of the assist-air blower and the vapor line valve. Verification shall be through visual observation, or through an automated alarm or shutdown system that monitors system operation. A manual or electronic record of the start and end of a shutdown event may be used.
 - (3) The Permittee shall perform semi-annual preventive maintenance inspections of the thermal oxidation system, including the automated alarm or shutdown system for those units so equipped, according to the recommendations of the manufacturer of the system.
 - (4) The monitoring plan developed under Condition 42.a.i.(a)(iii)(A) shall specify conditions that would be considered malfunctions of the thermal oxidation system during the inspections or automated monitoring performed under Condition 42.a.i.(iii)(A)(2) and (3), describe specific corrective actions that will be taken to correct any malfunction, and define what the owner or operator would consider to be a timely repair for each potential malfunction.
 - (5) The owner or operator shall document any system malfunction, as defined in the monitoring and inspection plan, and any activation of the automated alarm or shutdown system with a written entry into a log book or other permanent form of record. Such record shall also include a description of the corrective action taken and whether such corrective actions were taken in a timely manner, as defined in the monitoring and inspection plan, as well as an estimate of the amount of gasoline loaded during the period of the malfunction.

(b) Determine an operating parameter value based on the parameter data monitored during the performance test, supplemented by engineering assessments and the manufacturer's recommendations. [40 CFR 63.11092(b)(3)]

(c) Provide for the Control Officer's approval the rationale for the selected operating parameter value, monitoring frequency, and averaging time, including data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the emission standard in Condition 35.c.i.(b). [40 CFR 63.11092(b)(4)]

[See Notification of Compliance Status Report dated January 10, 2011]

ii. For performance tests performed after the initial test required under Condition 58.a, the Permittee shall document the reasons for any change in the operating parameter value since the previous performance test. [40 CFR 63.11092(c)]

iii. The Permittee shall comply with the following requirements: [40 CFR 63.11092(d)]

(a) Operate the vapor processing system(s) in a manner not to exceed or not to go below, as appropriate, the operating parameter value identified Attachment 3, Table 5 for the parameters described in Condition 42.a.i. [40 CFR 63.11092(d)(1)]

(b) Operation of the vapor processing system(s) in a manner exceeding or going below the operating parameter value, as appropriate, shall constitute a violation of the emission standards in Condition 35.c.i.(b) and 39.b. [40 CFR 63.11092(d)(3)]

b. *Gasoline Storage Tanks*

The Permittee shall comply with the following requirements: [40 CFR 63.11092(e)]

i. For all gasoline storage tanks equipped with an internal floating roof, the Permittee must perform inspections of the floating roof system according to the requirements in Condition 44.a or according to the requirements of 40 CFR 63.1063(c)(1) if the Permittee is complying with the option in Condition 35.b.ii.(d). [40 CFR 63.11092(e)(1)]

ii. For all gasoline storage tanks equipped with an external floating roof, the Permittee must perform inspections of the floating roof system according to the requirements of Condition 44.b or according to the requirements of 40 CFR 63.1063(c)(2) if the Permittee is complying with the option in Condition 35.b.ii.(d). [40 CFR 63.11092(e)(2)]

iii. For all gasoline storage tanks equipped with a closed vent system and control device, the Permittee must conduct a performance test and determine a monitored operating parameter value in accordance with the requirements in Condition 42.a.i through iii, except that the applicable level of control specified in Condition 63.b, shall be a 95-percent reduction in the inlet total organic compounds (TOC) levels rather than 35 mg/l of gasoline loaded. [40 CFR 63.11092(e)(3)]

c. *Gasoline Cargo Tank Testing*

The Permittee may elect, after notification to the Control Officer, to comply with the cargo tank certification test requirements in Condition 63.c in lieu of the NSPS Subpart XX requirement in Condition 53.b. [40 CFR 63.11092(f)]

43. *NSPS Storage Vessels Subject to 40 CFR 60 Subpart K* [Federally Enforceable Conditions]

None. Refer to recordkeeping requirements in Condition 50.

44. *NSPS Storage Vessels Subject to 40 CFR 60 Subpart Kb* [Federally Enforceable Conditions]

The following provisions are applicable to the affected emissions sources in Conditions 28.d and 30, as applicable, and equipment listed in Attachment 3, Tables 1 through 3. Depending on the control equipment installed, as required by Conditions 37 and 42.b, the Permittee shall meet the following requirements:

[40 CFR 60.113b]

a. *Internal Floating Roof (IFR) Storage Vessels*

After installing the control equipment, the Permittee shall:

[40 CFR 60 113b(a)]

i. Prior to filling the storage vessel with VOL:

[40 CFR 113b(a)(1)]

Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service). If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.

ii. For storage vessels equipped with a liquid mounted or mechanical shoe primary seal, at least once every 12 months after initial fill:

[40 CFR 60.113b(a)(2)]

Visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof. If the internal floating roof is not resting on the surface of the Volatile Organic Liquid (VOL) inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Control Officer in the inspection report required in Condition 51.a.iii. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.

iii. For storage vessels with a double-seal system as specified in Condition 37.a.ii.(b):

Visually inspect the storage vessel as specified in Condition 44.a.iv at least every 5 years or as specified in Condition 44.a.ii.

[40 CFR 60.113b(a)(3)]

iv. Each time the storage vessel is emptied or degassed:

Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any). If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years.

[40 CFR 60.113b(a)(4)]

- v. Notify the Control Officer in writing (by e-mail is also acceptable) at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by Conditions 44.a.i and 44.a.iv to afford the Control Officer the opportunity to have an observer present. If the inspection required by Condition 44.a.iv is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Control Officer at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent express mail (by email is also acceptable) so that it is received by the at least 7 days prior to the refilling. [40 CFR 60.113b(a)(5)]

b. *External Floating Roof (EFR) Storage Vessels*

After installing the control equipment the Permittee shall visually inspect each external floating roof storage vessel according to the following requirements: [40 CFR 60.113b(b)]

- i. Determine the gap areas and maximum gap widths, between the primary seal and the wall of the storage vessel and between the secondary seal and the wall of the storage vessel according to the following frequency: [40 CFR 60.113b(b)(1)]
- (a) Measurements of gaps between the tank wall and the primary seal (seal gaps) shall be performed during the hydrostatic testing of the vessel or within 60 days of the initial fill with VOL and at least once every 5 years thereafter. [40 CFR 60.113b(b)(1)(i)]
- (b) Measurements of gaps between the tank wall and the secondary seal shall be performed within 60 days of the initial fill with VOL and at least once per year thereafter. [40 CFR 60.113b(b)(1)(ii)]
- (c) If any source ceases to store VOL for a period of 1 year or more, subsequent introduction of VOL into the vessel shall be considered an initial fill for the purposes of Condition 44.b.i.(a) and (b). [40 CFR 60.113b(b)(1)(iii)]
- ii. Determine gap widths and areas in the primary and secondary seals individually by the following procedures: [40 CFR 60.113b(b)(2)]
- (a) Measure seal gaps, if any, at one or more floating roof levels when the roof is floating off the roof leg supports. [40 CFR 60.113b(b)(2)(i)]
- (b) Measure seal gaps around the entire circumference of the tank in each place where a 0.32-cm diameter uniform probe passes freely (without forcing or binding against seal) between the seal and the wall of the storage vessel and measure the circumferential distance of each such location. [40 CFR 60.113b(b)(2)(ii)]
- (c) The total surface area of each gap described in Condition 44.b.ii.(b) shall be determined by using probes of various widths to measure accurately the actual distance from the tank wall to the seal and multiplying each such width by its respective circumferential distance. [40 CFR 60.113b(b)(2)(iii)]
- iii. Add the gap surface area of each gap location for the primary seal and the secondary seal individually and divide the sum for each seal by the nominal diameter of the tank and compare each ratio to the respective standards in Condition 44.b.iv. [40 CFR 60.113b(b)(3)]

- iv. Make necessary repairs or empty the storage vessel within 45 days of identification in any inspection for seals not meeting the following requirements: [40 CFR 60.113b(b)(4)]
- (a). The accumulated area of gaps between the tank wall and the mechanical shoe or liquid-mounted primary seal shall not exceed 212 cm² per meter of tank diameter, and the width of any portion of any gap shall not exceed 3.81 cm. [40 CFR 60.113b(b)(4)(i)]
- (i) One end of the mechanical shoe is to extend into the stored liquid, and the other end is to extend a minimum vertical distance of 61 cm the stored liquid surface. [40 CFR 60.113b(b)(4)(i)(A)]
- (i) There are to be no holes, tears, or other openings in the shoe, seal fabric, or seal envelope. [40 CFR 60.113b(b)(4)(i)(A)]
- (b) The secondary seal is to meet the following requirements: [40 CFR 60.113b(b)(4)(ii)]
- (i) The secondary seal is to be installed so the primary seal so that it completely covers the space between the roof edge and the tank wall except as provided in Condition 44.b.ii.c. [40 CFR 60.113b(b)(4)(ii)(A)]
- (ii) The accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 cm² per meter of tank diameter, and the width of any portion of any gap shall not exceed 1.27 cm. [40 CFR 60.113b(b)(4)(ii)(B)]
- (iii). There are to be no holes, tears, or other openings in the seal or seal fabric. [40 CFR 60.113b(b)(4)(ii)(C)]
- (c) If a failure that is detected during inspections required in Condition 44.b.i cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Control Officer in the inspection report required in Condition 51.b.iv. Such extension request must include a demonstration of unavailability of alternate storage capacity and a specification of a schedule that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 60.113b(b)(4)(iii)]
- v. Notify the Control Officer 30 days in advance of any gap measurements required by Condition 44.b.i to afford the Control Officer the opportunity to have an observer present. [40 CFR 60.113b(b)(5)]
- vi. Visually inspect the external floating roof, the primary seal, secondary seal, and fittings each time the vessel is emptied and degassed. [40 CFR 60.113b(b)(6)]
- (a) If the external floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before filling or refilling the storage vessel with VOL. [40 CFR 60.113b(b)(6)(i)]
- (b) For all the inspections required by Condition 44.b.vi, the owner or operator shall notify the Control Officer in writing (by e-mail is acceptable) at least 30 days prior to the filling or refilling of each storage vessel to afford the Control Officer the opportunity to inspect the storage vessel prior to refilling. If the inspection required Condition 44.b.vi is not planned and Permittee could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Control Officer at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation (by email is acceptable) demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail (by e-mail is acceptable) so that it is received by the Control Officer at least 7 days prior to the refilling. [40 CFR 60.113b(b)(6)(ii)]

c. *Closed Vent Storage Vessels*

- i. The Permittee of each source that is equipped with a closed vent system and control device as required in Conditions 37.c or d (other than a flare) is exempt from 40 CFR 60.8 of the General Provisions (Performance Testing) and shall submit for approval by the Control Officer as an attachment to the notification required by 40 CFR 60.7(a)(1) or, if the facility is exempt from 40 CFR 60.7(a)(1), as an attachment to the notification required by 40 CFR 60.7(a)(1), an operating plan containing the following information: [40 CFR 60.113b(c) & (c)(1)]
- (a). Documentation demonstrating that the control device will achieve the required control efficiency during maximum loading conditions. This documentation is to include a description of the gas stream which enters the control device, including flow and VOC content under varying liquid level conditions (dynamic and static) and manufacturer's design specifications for the control device. If the control device or the closed vent capture system receives vapors, gases, or liquids other than fuels from sources that are not designated sources under Condition 30, the efficiency demonstration is to include consideration of all vapors, gases, and liquids received by the closed vent capture system and control device. [40 CFR 60.113b(c)(1)(i)]
- (b). A description of the parameter or parameters to be monitored to ensure that the control device will be operated in conformance with its design and an explanation of the criteria used for selection of that parameter (or parameters). [40 CFR 60.113b(c)(1)(ii)]
- ii. Operate the closed vent system and control device and monitor the parameters of the closed vent system and control device in accordance with the operating plan submitted to the Control Officer in accordance with Condition 44.c.i, unless the plan was modified by the Control Officer during the review process. In this case, the modified plan applies. [40 CFR 60.113b(c)(2)]

[Note: For the purpose of Condition 44.c.i, the Permittee has demonstrated the required control efficiency of the John Zink Thermal Oxidizer (TO) during maximum loading conditions through periodic performance testing and operation and maintenance of the TO in accordance with Conditions 40 and 47]

45. *Non-NSPS Storage Vessels and Equipment***[Locally Enforceable Condition]**

On an annual basis, the Permittee shall monitor for the following and ensure that there shall be no visible holes, tears, or other openings in the seal, or in any seal fabric. Where applicable, all openings except drains shall be equipped with a cover seal or lid. The cover seal or lid shall be in a closed position at all times, except when the device is in actual use. [PCC 17.16.230.A.1.b]

46. *NSPS Loading Racks***[Federally Enforceable & Material Permit Condition]**

Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. [40 CFR 60.502(j)]

47. *Air Pollution Control Equipment***[Federally Enforceable & Material Permit Conditions]**

[PCC 17.11.120.A]

In accordance with the approved CAM Plans in Attachment 2 and as provided in Condition 33, the Permittee shall conduct monitoring of the air pollution control equipment and indicators subject to the following provisions:

[40 CFR 64.7(a)]

a. *Proper Maintenance*

At all times the Permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

[40 CFR 64.7(b)]

b. *Continuous Operation*

Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the Permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this Condition, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c)]

c. *Response to Excursions or Exceedances*

i. Upon detecting an excursion or exceedance, the Permittee shall restore operation of the PSEU (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or the applicable emission limitation or standard, as applicable.

[40 CFR 64.7(d)(1)]

ii. Determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. In accordance with 40 CFR 64.8 the Control Officer may require the Permittee to develop and implement a Quality Improvement Plan (QIP) if the cumulative duration of exceedances or excursions exceeds 5% of a PSEU's operating time for a reporting period. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.

[40 CFR 64.7(d)(2) & 40 CFR 64.8(a)]

d. *Documentation of Need for Improved Monitoring*

If the Permittee identifies a failure to achieve compliance with an emission limitation or standard in Conditions 35.c, 39, or 40 for which the approved monitoring in Attachment 2 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the Permittee shall promptly notify the Control Officer and, if necessary, submit a permit revision in accordance with Condition 15 of this permit to address the necessary monitoring changes. Such a revision may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.6(c)(2) & 40 CFR 64.7(e)]

48. *Facility-Wide Operations*

[Locally Enforceable Conditions]

The following provisions are applicable to facility-wide operations.

a. *Operational Monitoring Requirements* **[Federally Enforceable and Material Permit Conditions]**
[PCC 17.11.120.A]

- i. The Permittee shall monitor rolling totals of throughput through the loading racks by complying with the recordkeeping requirements in Condition 55.b.i through iii.
- ii. The Permittee shall monitor rolling totals of the turnovers for each of the terminal drain dry tanks by complying with the recordkeeping requirements in Condition 55.b.iv.
- iii. The Permittee shall monitor the annual operating hours of the onsite portable thermal oxidizer by complying with the recordkeeping requirements in Condition 55.b.v.

b. *Odor Limiting Standard*

Monitoring for odors at the facility to determine compliance with the standard is not normally necessary as the use of good modern practices prevents the emission of odors beyond the property boundary. The Control Officer may ask the Permittee to test for odor emissions if the Control Officer has reasonable cause to believe a violation of a standard has been committed.

c. *VOC Handling*

On a semi-annual basis, the Permittee shall conduct inspections of the entire facility. The results, date, and initials of the inspecting personnel shall be recorded within 5 days of completing each inspection specifically taking note of the following:

- i. Check for leaks on piping, valves, joints, seals and any other ancillary equipment that may affect emissions.
- ii. Tighten or replace loose, missing damaged nuts, bolts, or screws as identified by visual inspection.

d. *Visible Emissions (VE)*

- i. The Permittee shall not be required to conduct periodic VE checks to demonstrate compliance with Condition 41.e and f unless the Control Officer has reason to believe that a violation of a standard has occurred or that reasonably necessary and feasible precautions to control the generation of airborne particulate matter are not being taken. At the request of the Control Officer, the Permittee shall conduct and record periodic VE checks, while the facility is in operation, from all point and nonpoint sources.

- ii. If the Permittee sees any emissions that, on an instantaneous basis, appears to exceed 20% opacity, or diffuse beyond the property boundary line, the Permittee shall investigate the source of the emissions and, if required, take corrective action. If the plume persists or the activity or operation which is causing or contributing to the emissions cannot be corrected or halted, the Permittee shall, when practicable, make a visual determination of the opacity in accordance with EPA reference Method 9 using a certified visible emissions evaluator (VEE). If the VE determination exceeds the applicable opacity limit, or the emissions diffuse beyond the property boundary line, the Permittee shall report this as an excess emission in accordance with Condition 11 of this permit. [PCC 17.16.040]

§ 5 – RECORDKEEPING REQUIREMENTS

[PCC 17.12.040.A.4]

49. Sources Subject to GD GACT

[Federally Enforceable Conditions]

The following provisions are applicable to the affected facilities in Condition 28.d and equipment listed in Attachment 3, Tables 1-5. [PCC 17.16.530.B.105]

a. Gasoline Storage Tanks

The Permittee shall keep records as specified in Conditions 51.a through c if the Permittee is complying with options in Conditions 35.b.ii.(a),(b), or (c), except records shall be kept for at least 5 years. If the Permittee is complying with the requirements of the option in Condition 35.b.ii.(d), the Permittee shall keep records as specified in 40 CFR 63.1065. [40 CFR 63.11094(a)]

b. Cargo Tanks

- i The Permittee shall keep records of the test results for each gasoline cargo tank loading at the facility as specified follows: [40 CFR 63.11094(b)]

- (a) Annual certification testing performed under Condition 63.c.i.
- (b) The documentation file shall be kept up-to-date for each gasoline cargo tank loading at the facility. The documentation for each test shall include, as a minimum, the following information:
- (i) Name of test: Annual Certification Test-Method 27.
 - (ii) Cargo tank owner's name and address.
 - (iii) Cargo tank identification number.
 - (iv) Test location and date.
 - (v) Tester name and signature.
 - (vi) Witnessing inspector, if any: Name, signature, and affiliation.
 - (vii) Vapor tightness repair: Nature of repair work and when performed in relation to vapor tightness testing.
 - (viii) Test results: Test pressure; pressure or vacuum change, mm of water; time period of test; number of leaks found with instrument; and leak definition.

- ii As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required in Condition 49.b, the Permittee may comply with either of the following requirements:
 - (a) An electronic copy of each record is instantly available at the terminal.
 - (i) The copy of each record in Condition 49.b.i is an exact duplicate image of the original paper record with certifying signatures.
 - (ii) The Control Officer is notified in writing that each terminal using this alternative is in compliance with Condition 49.b.i.
 - (b) For facilities that use a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by the Administrator's delegated representatives during the course of a site visit, or within a mutually agreeable time frame.
 - (i) The copy of each record in Condition 49.b.ii is an exact duplicate image of the original paper record with certifying signatures.
 - (ii) The Control Officer is notified in writing that each terminal using this alternative is in compliance with Condition 49.b.ii.

c. *Equipment Leak Inspections*

- i. The Permittee shall prepare and maintain a record describing the types, identification numbers, and locations of all equipment in gasoline service. For facilities electing to implement an instrument program under Condition 35.d, the record shall contain a full description of the program.
- ii. The Permittee shall record in the log book for each leak that is detected the following information:
 - (a) The equipment type and identification number.
 - (b) The nature of the leak (i.e., vapor or liquid) and the method of detection (i.e., sight, sound, or smell).
 - (c) The date the leak was detected and the date of each attempt to repair the leak.
 - (d) Repair methods applied in each attempt to repair the leak.
 - (e) "Repair delayed" and the reason for the delay if the leak is not repaired within 15 calendar days after discovery of the leak.
 - (f) The expected date of successful repair of the leak if the leak is not repaired within 15 days.
 - (g) The date of successful repair of the leak.

d. *Loading Racks*

- i. The Permittee shall keep an up-to-date, readily accessible record of the continuous monitoring data required under Condition 42.a. This record shall indicate the time intervals during which loadings of gasoline cargo tanks have occurred or, alternatively, shall record the operating parameter data only during such loadings. The date and time of day shall also be indicated at reasonable intervals on this record.

- ii. The Permittee shall record and report simultaneously with the Notification of Compliance Status required under Condition 56.a all data and calculations, engineering assessments, and manufacturer's recommendations used in determining the operating parameter value under Condition 42.a.
- iii. If the Permittee requests approval to use a vapor processing system or monitor an operating parameter other than those specified in Condition 42.a, the owner or operator shall submit a description of planned reporting and recordkeeping procedures.
- iv. The Permittee shall keep the following records:
 - (a) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment.
 - (b) Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 42.a, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

50. *NSPS Storage Vessels Subject to 40 CFR 60 Subpart K*

The following provisions are applicable to the affected facilities in Conditions 28.d and 29 as applicable and equipment listed in Attachment 3, Table 2.

- a. The Permittee shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period. [40 CFR 60.113(a)]
[Federally Enforceable Condition]
- b. Available data on the typical Reid vapor pressure and the maximum expected storage temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517, unless the Administrator/Control Officer specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.113 (b)]
[Federally Enforceable Condition]
- c. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa (2.0 psia) or whose physical properties preclude determination by the recommended method is to be determined from available data and recorded if the estimated true vapor pressure is greater than 6.9 kPa (1.0 psia). [40 CFR 60.113 (c)]
- d. The storage temperature used to calculate the maximum true vapor pressure in Condition 50.b shall be calculated based upon the maximum local monthly ambient temperature as reported by the National Weather Service. [PCC 17.12.040.A.4]
[Locally Enforceable Condition]

51. *NSPS Storage Vessels Subject to 40 CFR 60 Subpart Kb***[Federally Enforceable Conditions]**

The following provisions are applicable to the affected facilities in Conditions 28 and 30 and equipment listed in Attachment 3, Tables 1 through 3 as applicable. The Permittee of each affected storage vessel shall keep records and furnish reports as required by Conditions 51.a through c depending upon the control equipment installed to meet the requirements in Condition 37. The Permittee shall keep copies of all reports and records required by Conditions 51.a through c, for at least 2 years. The record required by Condition 51.a.i will be kept for the life of the control equipment. [40 CFR 60.115b]

a. *Internal Floating Roof (IFR) Tanks*

- i. After installing control equipment in accordance with Condition 37.a, the Permittee shall furnish the Control Officer with a report that describes the control equipment and certifies that the control equipment meets the specifications of Conditions 37.a and 44.a.i. This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3). [40 CFR 60.115b(a)(1)]
- ii. The Permittee shall keep a record of each inspection performed as required by Condition 44.a.i through iv. Each record shall identify: [40 CFR 60.115b(a)(2)]
 - (a) The storage vessel on which the inspection was performed;
 - (b) The date the vessel was inspected; and
 - (c) The observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
- iii. If any conditions described in Condition 44.a.ii are detected during the annual visual inspection, report to the Control Officer within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a)(3)]
- iv. After each inspection required by Condition 44.a.iii that finds holes or tears in the seal fabric, or defects in the internal floating roof, or other listed control equipment defects, a report shall be provided to the Control Officer within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specification of 37.a or 44.a.iii. [40 CFR 60.115b(a)(4)]

b. *External Floating Roof (EFR) Tanks*

- i. After installing control equipment in accordance with Condition 37.b (external floating roof), the Permittee shall furnish the Control Officer with a report that describes the control equipment and certifies the control equipment meets the specifications of Conditions 37.b and 44.b.i through iv. This report shall be an attachment to the notification required by 40 CFR 60.7(a)(3). [40CFR 60.115b(b)(1)]
- ii. Within 60 days of performing the seal gap measurements required by Condition 44.b.i, furnish the Control Officer with a report that contains: [40 CFR 60.115b(b)(2)]
 - (a) The date of measurement.
 - (b) The raw data obtained in the measurement.
 - (c) The calculations described in Conditions 44.b.ii and iii.

iii. Keep a record of each gap measurement performed as required by Condition 44.b. Each record shall identify the storage vessel in which the measurement was performed and shall contain:

[40 CFR 60.115b(b)(3)]

- (a) The date of measurement.
- (b) The raw data obtained in the measurement.
- (c) The calculations described in Conditions 44.b.ii and iii.

iv. After each seal gap measurement that detects gaps exceeding the limitations specified by Condition 44.b.iv, submit a report to the Control Officer within 30 days of the inspection. The report will identify the vessel and contain the information specified in Condition 51.b.ii and the date the vessel was emptied or the repairs made and date of repair.

[40 CFR 60.115b(b)(4)]

c. *Closed Vent Tanks*

[40 CFR 60.115b(c)]

After installing control equipment in accordance with Condition 37.c (closed vent system and control device other than a flare), the Permittee shall keep the following records:

- i. A copy of the operating plan. [40 CFR 60.115b(c)(1)]
 - ii. A record of the measured values of the parameters monitored in accordance with Condition 37.c. [40 CFR 60.115b(c)(2)]
- d. The Permittee shall keep copies of all reports and records required by Condition 51.f through j (below) for at least 2 years, except for the record required by Condition 51.e will be kept for the life of the source. [40 CFR 60.116b(a)]
- e. The Permittee shall keep readily accessible records showing the dimension of each applicable storage vessel and an analysis showing its capacity. [40 CFR 60.116b(b)]
- f. Except as provided in Conditions 30 , 51.i and 51.j, the Permittee shall for each affected storage vessel maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.116b(c)]
- g. Except as provided in Condition 51.j, the Permittee of each storage vessel storing a liquid with a maximum true vapor pressure that is normally less than the respective cutoff for controls specified in Condition 30, the Permittee shall notify the Control Officer within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range. [40 CFR 60.116b(d)]
- h. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below: [40 CFR 60.116b(e)]
- i. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. [40 CFR 60.116b(e)(1)]
 - ii. For crude oil or refined petroleum products the vapor pressure may be obtained by the following: [40 CFR 60.116b(e)(2)]

- (a) Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference - See 40 CFR 60.17), unless the Control Officer specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.116b(e)(2)(i)]
- (b) The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa. [40 CFR 60.116b(e)(2)(ii)]
- iii. For other liquids, the vapor pressure may be: [40 CFR 60.116b(e)(3)(i-iv)]
 - (a) Obtained from standard reference texts;
 - (b) Determined by ASTM D2879-83, 96, or 97 (incorporated by reference-see 40 CFR 60.17);
 - (c) Measured by an appropriate method approved by the Control Officer; or
 - (d) Calculated by an appropriate method approved by the Control Officer.
- i. The owner or operator of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements. [40 CFR 60.116b(f)]
 - i. Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in Condition 51.h.
 - ii. For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in Condition 30.b, an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods:
 - (a) ASTM D2879-83, 96, or 97 (incorporated by reference - see 40 CFR 60.17); or
 - (b) ASTM D323-82 or 94 (incorporated by reference - see 40 CFR 60.17); or
 - (c) As measured by an appropriate method as approved by the Administrator.
 - j. The Permittee of each vessel equipped with a closed vent system and control device meeting the specification of Condition 37 is exempt from the requirements of Conditions 51.f and g. [40 CFR 60.116b(f)]

52. *Non-NSPS Storage Vessels and Equipment*

[Locally Enforceable Conditions]

The following provisions are applicable to the affected facilities in Condition 31 and applicable equipment identified in Attachment 3, Table 1.

- a. The Permittee shall maintain a file for each storage vessel including each type of liquid stored, the typical Reid vapor pressure of each type of liquid stored, and the dates of storage. Dates on which a storage vessel is empty shall be shown. [PCC 17.16.230.E]

- b. The monitoring of operations required by Condition 52 is as follows:
- i. The owner or operator of any petroleum liquid storage vessel to which Condition 52 applies shall for each such storage vessel maintain a file of each type of petroleum liquid stored, of the typical Reid vapor pressure of each type of petroleum liquid stored, and of dates of storage. Dates on which the storage vessel is empty shall be shown.
 - ii. The owner or operator of any petroleum liquid storage vessel to which Condition 52 applies shall for such storage vessel determine and record the average monthly storage temperature and true vapor pressure of the petroleum liquid stored at such temperature if either:
 - (a) The petroleum liquid has a true vapor pressure, as stored, greater than twenty-six mm Hg (0.5 psia) but less than seventy-eight mm Hg (1.5 psia) and is stored in a storage vessel other than one equipped with a floating roof, a vapor recovery system or their equivalents; or
 - (b) The petroleum liquid has a true vapor pressure, as stored, greater than 470 mm Hg (9.1 psia) and is stored in a storage vessel other than one equipped with a vapor recovery system or its equivalent.
 - iii. The average monthly storage temperature shall be an arithmetic average calculated for each calendar month, or portion thereof if storage is for less than a month, from bulk liquid storage temperatures determined at least once every seven days.
 - iv. The true vapor pressure shall be determined by the procedures in American Petroleum Institute Bulletin 2517, amended as of February, 1980 (and no future editions), which is incorporated herein by reference and on file with the Office of the Secretary of State. The procedure is dependent upon determination of the storage temperature and the Reid vapor pressure, which requires sampling of the petroleum liquids in the storage vessels. Unless the Control Officer requires in specific cases that the stored petroleum liquid be sampled, the true vapor pressure may be determined by using the average monthly storage temperature and the typical Reid vapor pressure. For those liquids for which certified specifications limiting the Reid vapor pressure exist, the Reid vapor pressure may be used. For other liquids, supporting analytical data must be made available upon request to the Control Officer when typical Reid vapor pressure is used.

53. *NSPS Loading Racks*

[Federally Enforceable & Material Permit Conditions]

[PCC 17.11.120.A]

The following provisions are applicable to the affected facilities in Condition 32 and equipment identified in Attachment 3, Table 4.

a. *Leak Inspections*

A record of each monthly leak inspection required under Condition 46 shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum the following information:

[40 CFR 60.505(c)]

- i. Date of inspection.
- ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).
- iii. Leak determination method.
- iv. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).
- v. Inspector name and signature.

b. *Tank Trucks*

The Permittee shall maintain the following records to demonstrate that liquid product was loaded into vapor-tight gasoline tank trucks by using the following procedures:

[Note: A vapor-tight gasoline tank truck means a gasoline tank truck which has demonstrated within the 12 preceding months that its product delivery tank will sustain a pressure change of not more than 750 pascals (75 mm of water) within 5 minutes after it is pressurized to 4,500 pascals (450 mm of water). This capability is to be demonstrated using the pressure test procedure specified in Method 27]. [40 CFR 60.501]

- i. The Permittee shall obtain the vapor tightness documentation for each gasoline tank truck which is to be loaded at the affected facility. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:

[40 CFR 60.502(e)(1) & 40 CFR 60.505(a) & (b)]

- (a) Test title: Gasoline Delivery Tank Pressure Test—EPA Reference Method 27.
 - (b) Tank owner and address.
 - (c) Tank identification number.
 - (d) Testing location.
 - (e) Date of test.
 - (f) Tester name and signature.
 - (g) Witnessing inspector, if any: Name, signature, and affiliation.
 - (h) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs). The tank truck vapor tightness documentation shall be kept on file at the terminal in a permanent form available for inspection.
- ii. The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility. [40 CFR 60.502(e)(2)]
- iii. The Permittee shall cross-check each tank identification number obtained in Condition 53.b.ii with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained: [40 CFR 60.502(e)(3)(i)]
- (a) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or
 - (b) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.
- iv. If either the quarterly or semiannual cross-check provided in Condition 53.b.iii.(a) through (b) reveals that these conditions were not maintained, the Permittee shall return to biweekly monitoring until such time as these conditions are again met. [40 CFR 60.502(e)(3)(ii)]
- v. The Permittee shall notify the owner or operator of each non-vapor-tight gasoline tank loaded at the facility within 1 week of the documentation cross-check described in Condition 53.b.iii.

[40 CFR 60.502(e)(4)]

- vi. The Permittee shall take steps assuring that the non-vapor-tight tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained. [40 CFR 60.502(e)(5)]
- vii. Alternate procedures to those described Conditions 53.b.i through vi for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Administrator. [40 CFR 60.502(e)(6)]
- viii. The Permittee shall keep documentation of all notifications required in Condition 53.b.v. [40 CFR 60.505(d)]
- ix. As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required by Conditions 53.b.i, ii, and iv, the Permittee may comply with the requirements in either Conditions 53.b.ix.(a) or (b): [40 CFR 60.505(e)]
- (a) An electronic copy of each record is instantly available at the terminal.
- (i) The copy of each record is an exact duplicate image of the original paper record with certifying signatures.
- (ii) The Control Officer is notified in writing that each terminal using this alternative is in compliance with this alternative.
- (ii) For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by the Control Officer's representatives during the course of a site visit, or within a mutually agreeable time frame.
- (A) The copy of each record is an exact duplicate image of the original paper record with certifying signatures.
- (B) The Control Officer is notified in writing that each terminal using this alternative is in compliance with this alternative.
- (b) For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by permitting authority representatives during the course of a site visit, or within a mutually agreeable time frame.
- (i) The copy of each record in Condition 53.b.i is an exact duplicate image of the original paper record with certifying signatures.
- (ii) The permitting authority is notified in writing that each terminal using this alternative is in compliance with Condition 53.b.i.
- x. The Permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years. [40 CFR 60.505(f)]

54. *Air Pollution Controls***[Federally Enforceable & Material Permit Conditions]**

[PCC 17.11.120.A]

The following provisions are applicable to the affected facilities in Condition 33.b and equipment listed in Attachment 3 Table 5. The Permittee shall maintain records of the monitoring of the air pollution control equipment and indicators in accordance with the approved Cam Plans in Attachment 2 and according to the following:

[40 CFR 64.9(b)]

- a. The Permittee shall comply with the recordkeeping requirements specified in Condition 55.a. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required in Condition 47.c.ii, and any activities undertaken to implement a quality improvement plan (if required), and other supporting information required to be maintained in accordance with Conditions 33 and 47, and the approved monitoring plans in Attachment 2 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). [40 CFR 64.9(b)(1)]
- b. Instead of paper records, the Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [40 CFR 64.9(b)(2)]

55. *Facility-Wide Operations*

The following provisions are applicable to facility-wide operations.

a. *General Recordkeeping Requirements***[Federally Enforceable Condition]**

The Permittee shall maintain records of required monitoring in accordance with Condition 12.

[PCC 17.12.040.4.a]

b. *Voluntary Limitations***[Federally Enforceable Conditions]**

Within 30 days of the end of each month, the Permittee shall record the following in a log kept on-site:

[PCC 17.11.190.B]

- i. The combined throughput of all products through all loading racks in the previous month and the calculated combined throughput in the previous 12-month rolling period; and
- ii. The combined throughput of gasoline (including oxygenate and additives) through loading rack LR-5 in the previous month and the calculated combined throughput in the previous 12-month rolling period; and
- iii. The combined throughput of gasoline (including oxygenate and additives) through loading rack LR-6 in the previous month and the calculated combined throughput in the previous 12-month rolling period; and
- iv. The tank identification, product type, and total number of turnovers for each of the terminal drain dry tanks in the previous month and the calculated annual number of turnovers in the previous 12-month rolling period; and
- v. The total operating hours of the onsite portable thermal oxidizer in the previous month and the calculated annual operating hours in the previous 12-month rolling period; and
- vi. The initials of the recording personnel and date recorded.

c. *VOC Handling* **[Locally Enforceable Condition]**

The Permittee shall maintain records of the semiannual inspections required in Condition 48.c.

[PCC 17.12.040.4.a]

d. *Record Retention* **[Locally Enforceable Condition]**

The Permittee shall retain records of all required monitoring data and support information for at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

[PCC 17.12.040.4.b]

e. *Recordkeeping for Compliance Determinations* **[Locally Enforceable Condition]**

The Permittee shall retain a copy of the permit onsite including all required monitoring records and support information. In addition, all equipment identified in the permit equipment list shall be marked with a unique, clearly visible, and accessible ID to identify the piece of equipment. The Permittee shall be considered in compliance by demonstrating that sufficient information on the equipment and facility operations is periodically collected, recorded, and maintained to assure that the compliance status of any Specific Condition of this permit can be readily ascertained at any time.

[PCC 17.11.060 & PCC 17.24.020.A]

§ 6 – REPORTING REQUIREMENTS

[PCC 17.12.040.A.5 & PCC 17.12.210, SIP Rule 403]

56. *Sources Subject to GD GACT* **[Federally Enforceable Conditions]**

a. *Notifications*

i. The Permittee must submit an Initial Notification as specified in 40 CFR 63.9(b). If the Permittee's facility is in compliance with the requirements of Condition 28 at the time the Initial Notification is due, the Notification of Compliance Status required under Condition 56.a.ii may be submitted in lieu of the Initial Notification.

[40 CFR 63.11093(a)]

ii. The Permittee must submit a Notification of Compliance Status as specified in 40 CFR 63.9(h). The Notification of Compliance Status must specify which of the compliance options in Condition 35.b is used to comply.

[40 CFR 63.11093(a)]

[See Notification of Compliance Status Report dated January 10, 2011]

iii. The Permittee must submit a Notification of Performance Test, as specified in 40 CFR 63.9(e), prior to initiating testing required by Condition 63.a or b.

[40 CFR 63.11093(c)]

iv. The Permittee must submit additional notifications specified in 40 CFR 63.9, as applicable.

[40 CFR 63.11093(d)]

b. *Semiannual Summary Reports of Required Monitoring* [PCC 17.12.040.A.5.a]

The Permittee shall include in the semiannual compliance report to the Control Officer required in Condition 62.b the following information, as applicable:

[40 CFR 63.11095(a)]

i. *Gasoline Storage Tanks*

(a) For storage vessels, the information specified in Conditions 51.a through c, depending on the control equipment installed, or if the Permittee is complying with the option in Condition 35.b.ii.(d), the information specified in 40 CFR 63.1066.

[40 CFR 63.11095(a)(1)]

- (b) For storage vessels complying with Condition 35.b.iii after January 10, 2011, the storage vessel's Notice of Compliance Status Information can be included in the next semi-annual compliance report in lieu of filing a separate Notification of Compliance Status report in Condition 56.a.ii. [40 CFR 63.11095(a)(4)]

ii. *Loading Racks*

For loading racks, each loading of a gasoline cargo tank for which vapor tightness documentation had not been previously obtained by the facility. [40 CFR 63.11095(a)(2)]

iii. *Equipment Leak Inspections*

For equipment leak inspections the number of equipment leaks not repaired within 15 days after detection. [40 CFR 63.11095(a)(3)]

c. *Excess Emissions Report*

The Permittee shall submit an excess emissions report to the Control Officer at the time the semiannual compliance report is submitted in Condition 62.b. Excess emissions events, and the information to be included in the excess emissions report, are specified below: [40 CFR 63.11095(b)]

- i. Each instance of a non-vapor-tight gasoline cargo tank loading at the facility in which the Permittee failed to take steps to assure that such cargo tank would not be reloaded at the facility before vapor tightness documentation for that cargo tank was obtained. [40 CFR 63.11095(b)(1)]
- ii. Each reloading of a non-vapor-tight gasoline cargo tank at the facility before vapor tightness documentation for that cargo tank is obtained by the facility in accordance with Condition 49.b.i. [40 CFR 63.11095(b)(2)]
- iii. Each exceedance or failure to maintain, as appropriate, the monitored operating parameter value determined under Condition 42.a. The report shall include the monitoring data for the days on which exceedances or failures to maintain have occurred, and a description and timing of the steps taken to repair or perform maintenance on the vapor collection and processing systems or the CMS. [40 CFR 63.11095(b)(3)]
- iv. Each instance in which malfunctions discovered during the monitoring and inspections required under Condition 42.a.i.(a).(iii).(A) were not resolved according to the necessary corrective actions described in the monitoring and inspection plan. The report shall include a description of the malfunction and the timing of the steps taken to correct the malfunction. [40 CFR 63.11095(b)(4)]
- v. For each occurrence of an equipment leak for which no repair attempt was made within 5 days or for which repair was not completed within 15 days after detection: [40 CFR 63.11095(b)(5)]
 - (a) The date on which the leak was detected;
 - (b) The date of each attempt to repair the leak;
 - (c) The reasons for the delay of repair; and
 - (d) The date of successful repair.

d. *Malfunction Report*

The Permittee shall submit a semiannual report including the number, duration, and a brief description of each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with Condition 35.a, including actions taken to correct a malfunction. The report may be submitted as a part of the semiannual compliance report in Condition 62.b. Owners or operators of affected bulk plants and pipeline pumping stations are not required to submit malfunction reports for periods during which no malfunctions occurred. [40 CFR 63.11095(d)]

57. *NSPS Storage Vessels Subject to 40 CFR 60 Subpart K* [Federally Enforceable Conditions]

There are no specific reporting requirements other than those listed in Condition 62.

58. *NSPS Storage Vessels Subject to 40 CFR 60 Subpart Kb* [Federally Enforceable Conditions]

There are no specific reporting requirements other than those listed Condition 62.

59. *Non-NSPS Storage Vessels and Equipment*

There are no specific reporting requirements other than those listed in Condition 62.

60. *NSPS Loading Racks* [Federally Enforceable & Material Permit Conditions]

There are no specific reporting requirements other than those listed in Conditions 53.b.v and 62.

61. *Air Pollution Controls* [Federally Enforceable & Material Permit Conditions]
[PCC 17.11.120.A]a. *John Zink Thermal Oxidizer* [PCC 17.24.050]

The Permittee shall submit manufacturer's recommendations or an Operations and Maintenance Plan for the John Zink Thermal Oxidizer in Condition 33.b within 90 days of issuance or renewal of the permit for existing equipment and within 90 days of installation for new equipment. Failure to submit the required documents will constitute a violation of the permit. Failure to submit the required documents shall also constitute an excursion for purposes of Compliance Assurance Monitoring as provided in Condition 47.c.ii. [See Manufacturer's Recommendations for the John Zink Thermal Oxidizer submitted May 9, 2008]

b. *John Zink Vapor Recovery System* [PCC 17.24.050]

The Permittee shall submit manufacturer's recommendations or an Operations and Maintenance Plan for the John Zink Vapor Recovery System identified in Condition 33.b within 90 days of issuance or renewal of the permit for existing equipment and within 90 days of installation for new equipment. Failure to submit the required documents will constitute a violation of the permit. Failure to submit the required documents shall also constitute an excursion for purposes of Compliance Assurance Monitoring as provided in Condition 47.c.ii.

c. *NAO Thermal Oxidizer*

The Permittee shall submit manufacturer's recommendations or an Operations and Maintenance Plan for the NAO Thermal Oxidizer identified in Condition 33.b within 90 days of issuance or renewal of the permit for existing equipment and within 90 days of installation for new equipment. Failure to submit the required documents will constitute a violation of the permit. Failure to submit the required documents shall also constitute an excursion for purposes of Compliance Assurance Monitoring as provided in Condition 47.c.ii.

d. The Permittee shall include at a minimum a report of summary information for the PSEU's identified in Condition 33 in the Semiannual Summary Report of Required Monitoring as required by Condition 62.b. The summary report shall include the following information as applicable: [40 CFR 64.9(a)(2)]

- a. The number, duration, cause (including unknown cause, if applicable) of excursions or exceedances as applicable, and the corrective action taken [40 CFR 64.9(a)(2)(i)]
- b. The number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). [40 CFR 64.9(a)(2)(ii)]
- c. A description of the actions taken to implement a QIP during the reporting period if the cumulative duration of exceedances or excursions exceeds 5% of a PSEU's operating time for a semiannual reporting period as provided in Condition 47.c.ii.

62. *Facility-Wide Operations***[Locally Enforceable Conditions]**a. *Special Reporting for the Affected Source or Process* [PCC 17.12.040.A.5.b]

The Permittee shall promptly submit written reports to the Control Officer of any instances of deviation from permit requirements in accordance with Condition 11.b.

b. *Semiannual Summary Reports of Required Monitoring* [PCC 17.12.040.A.5.a]

The Permittee shall submit a semiannual summary report of all permit deviations and exceedances that have occurred during the reporting period. The report shall also include at a minimum the information as required by Conditions 56.b through d, any excursions as required by Condition 61.d and the associated CAM Plans in Attachment 2, and a summary of the information required in Condition 55.b. Semiannual reports shall be due on April 30th and October 31st of each year and shall cover the period October 1st through March 31st and April 1st through September 30th, respectively. The first semiannual report may not cover a six-month period.

c. *Compliance Certification Reporting* [PCC 17.12.080]

The Permittee shall submit a compliance certification to the Control Officer pursuant to Condition 7 of this permit. Annual compliance certification reports shall be due on April 30th of each year and shall cover the period April 1st through March 31st. The first annual report may not cover a 12-month period.

d. *Emissions Inventory Reporting* [PCC 17.12.160]

Every source subject to a permit requirement shall complete and submit to the Control Officer, when requested, an annual emissions inventory questionnaire pursuant to Condition 6 of this permit.

For purposes of demonstrating compliance, these test methods shall be used, provided that for the purpose of establishing whether or not the facility has violated or is in violation of any provision of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable federal requirements if the appropriate performance or compliance procedures or methods had been performed.

The Permittee shall use the following EPA approved reference test methods and performance specifications when required. Except as otherwise specified the referenced test methods and performance specifications are from 40 CFR 60, Appendix A and B.

63. Sources Subject to GD GACT

[Federally Enforceable Condition]

Vapor Processing and Collection System: The Permittee must comply with the following requirements:

- a. The Permittee shall conduct a performance test on the vapor processing and collection systems according to either Condition 63.a.i or Condition 63.a.ii.
 - i. Use the test methods and procedures in Condition 67, except a reading of 500 parts per million shall be used to determine the level of leaks to be repaired under Condition 67.b. [40 CFR 63.11092(a)(1)(i)]
 - ii. Use alternative test methods and procedures in accordance with the alternative test method requirements in 40 CFR 63.7(f). [40 CFR 63.11092(a)(1)(ii)]
- b. If the Permittee is operating gasoline loading rack(s) in compliance with an enforceable State, local, or tribal rule or permit that requires the loading rack to meet an emission limit of 80 milligrams (mg), or less, per liter of gasoline loaded (mg/l), you may submit a statement by a responsible official of your facility certifying the compliance status of your loading rack in lieu of the test required under Condition 63.a.

[40 CFR 63.11092(a)(3)]

[See Notification of Compliance Status Report dated January 10, 2011]

c. Annual Certification Test for Gasoline Cargo Tanks

The annual certification test for gasoline cargo tanks shall consist of the following test methods. Affected facilities that are subject as described in Condition 32 may elect, after notification to the Control Officer, to comply with the following in lieu of the certification test requirements in Condition 53.b:

[40 CFR 63.11092(f)]

- i. EPA method 27 shall be used to test gasoline cargo tanks subject to the following:

Conduct the test using a time period (t) for the pressure and vacuum tests of 5 minutes. The initial pressure (Pi) for the pressure test shall be 460 millimeters (mm) of water (18 inches of water), gauge. The initial vacuum (Vi) for the vacuum test shall be 150 mm of water (6 inches of water), gauge. The maximum allowable pressure and vacuum changes (Δp , Δv) for all affected gasoline cargo tanks is 3 inches of water, or less, in 5 minutes.

[40 CFR 63.11092(f)(1)]

- d. Performance tests conducted for sources subject to Condition 28 shall be conducted under such conditions as the Control Officer specifies to the Permittee, based on representative performance (i.e., performance based on normal operating conditions) of the affected source. Upon request, the Permittee shall make available to the Control Officer such records as may be necessary to determine the conditions of performance tests.

[40 CFR 63.11092(g)]

64. *NSPS Storage Vessels Subject to 40 CFR 60 Subpart K* [Federally Enforceable Conditions]

None.

65. *NSPS Storage Vessels Subject to 40 CFR 60 Subpart Kb* [Federally Enforceable Conditions]

None. See Condition 44 for requirements.

66. *Non-NSPS Storage Vessels and Equipment*

None. See Condition 45 for requirements.

67. *NSPS Loading Racks* [Federally Enforceable & Material Permit Conditions]

[PCC 17.11.120.A]

The following provisions are applicable to the affected facilities in Condition 32 and equipment identified in Attachment 3, Table 4.

- a. In conducting the performance tests required in 40 CFR 60.8, the Permittee shall use as reference methods and procedures the test methods in Appendix A of 40 CFR 60, except as provided in 40 CFR 60.8(b). The three-run requirement of 40 CFR 60.8(f) does not apply. [40 CFR 60.503(a)]
- b. Immediately before the performance test required to determine compliance with Conditions 39.b & 39.g, the Permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. Except as provided in Condition 63.a.i, the Permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test. [40 CFR 60.503(b)]
- c. Except as provided in Condition 67.c.viii, at least once during the permit term, the Permittee shall determine compliance with the standards in Condition 39.b as follows: [40 CFR 60.503(c)]
 - i. The performance test shall be 6 hours long during which at least 300,000 liters of gasoline is loaded. If this is not possible, the test may be continued the same day until 300,000 liters of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000-liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.
 - ii. If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.
 - iii. The emission rate (E) of total organic compounds shall be computed using the following equation:

$$E = K \sum_{i=1}^n (V_{esi} C_{ei}) (L10^6) \quad \text{where:}$$

E=emission rate of total organic compounds, mg/liter of gasoline loaded.

V_{esi}=volume of air-vapor mixture exhausted at each interval "i", scm.

C_{ei}=concentration of total organic compounds at each interval "i", ppm.

L=total volume of gasoline loaded, liters.

n=number of testing intervals.

i=emission testing interval of 5 minutes.

K=density of calibration gas, 1.83×10⁶ for propane and 2.41×10⁶ for butane, mg/scm.

- iv. The performance test shall be conducted in intervals of 5 minutes. For each interval “i”, readings from each measurement shall be recorded, and the volume exhausted (V_{esi}) and the corresponding average total organic compounds concentration (C_{ei}) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.
- v. The following methods shall be used to determine the volume (V_{esi}) air-vapor mixture exhausted at each interval:
 - (a) Method 2B shall be used for combustion vapor processing systems.
 - (b) Method 2A shall be used for all other vapor processing systems.
- vi. Method 25A or 25B shall be used for determining the total organic compounds concentration (C_{ei}) at each interval. The calibration gas shall be either propane or butane. The Permittee may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the Control Officer.
- vii. To determine the volume (L) of gasoline dispensed during the performance test period at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used.
- viii. If more than 5 years has elapsed since the previous performance test of the NAO Thermal Oxidizer, the Permittee shall be required to conduct a performance test of the unit within 180 days of cumulative operation under the alternate operating scenario as provided in Condition 40.c.

[PCC 17.12.040.A.3 & 17.11.210.A]

- d. The Permittee shall determine compliance with Condition 39.g as follows: [40 CFR 60.503(d)]
 - i. A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ± 2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.
 - ii. During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.

68. *Air Pollution Controls* [Federally Enforceable & Material Permit Conditions]

The Permittee shall measure and monitor the indicators and data collection systems for the air pollution controls and PSEU's identified in Condition 33.b during the performance test and promptly notify the Control Officer if there is a need to revise the approved CAM plans in accordance with Condition 47.d. [40 CFR 64.7(e)]

69. *Facility-Wide Operations* [Locally Enforceable Conditions]

Should the Permittee be required by the Control Officer to test to determine compliance with any applicable standard, the Control Officer shall send a written request with the appropriate test methods.

[PCC 17.20.010, SIP Reg 50]

ATTACHMENT 1:
APPLICABLE REGULATIONS

APPLICABLE REGULATIONS

Code of Federal Regulations:

40 CFR, Part 60 Standards of Performance for New Stationary Sources

- Subpart A General Provisions
- Subpart K Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978
- 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
- Subpart XX Standards of Performance for Bulk Gasoline Terminals
- Appendix A Test Methods
- Appendix B Performance Specifications

40, CFR, Part 63 National Emission Standards for Hazardous Air Pollutants for Source Categories

- Subpart A General Provisions
- Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminal, Bulk Plants, and Pipeline Facilities

40, CFR, Part 64 Compliance Assurance Monitoring

Pima County Code, Title 17, Chapter 17.11 – General Provisions

Article I – Scope and Authority

- 17.11.010 Statutory Authority.
- 17.11.020 Planning, Constructing, or Operating Without a Permit.

Article II – General Provisions for Stationary Sources

- 17.11.060 Permit display or posting.
- 17.11.080 Permit shield.
- 17.11.120 Material permit condition.
- 17.11.160 Test methods and procedures.
- 17.11.190 Permits Containing synthetic emission limitations and standards.
- 17.11.210 Performance tests.

Pima County Code, Title 17, Chapter 17.12 – Individual Permits and Permit Revisions for Class I Permits

Article I – Application Processing and Procedures

- 17.12.010 Permit application processing procedures for Class I Permits.
- 17.12.040 Permit Contents for Class I permits.

Article II – Permit Revisions, Renewal, and Transfers for Class I Permits.

- 17.12.080 Compliance plan.
- 17.12.090 Facility changes allowed without permit revisions.
- 17.12.100 Administrative permit amendments.
- 17.12.110 Minor permit Amendments.
- 17.12.120 Significant permit revision.
- 17.12.130 Permit reopenings – revocation and reissuance – termination.
- 17.12.140 Permit renewal and expiration.

Article III – Emissions for Class I Permits

- 17.12.160 Annual emissions inventory questionnaire.
- 17.12.170 Excess emissions reporting requirements.
- 17.12.180 Affirmative defenses for excess emissions due to malfunctions, startup, and shutdown.

Article V – Fees for Class I Permits

- 17.12.220 Fees related to Class I permits.

Pima County Code, Title 17, Chapter 17.14 – Activity Permits

- 17.14.040 Fugitive dust activity permits.

Pima County State Implementation Plan (SIP):

- SIP Regulations: 10, 11, 20, 21, 22, 23, 24, 33, 34, 50, 51, 61, 62, 63, 70, 72
- SIP Rules: 101-113, 201-215, 222, 224, 233, 241, 261, 301, 302, 314, 315, 316, 318, 321, 341-44, 403, 501-506, 611, 612, 621-624, 631, 711-714, 721, 722

Pima County Code, Title 17, Chapter 17.16 – Emission Limiting Standards

Article I – General Provisions

- 17.16.010 Local rules and standards – Applicability of more than one standard.
- 17.16.020 Noncompliance with applicable standards.
- 17.16.030 Odor limiting standards.

Article II – Visible Emission Standards

- 17.16.040 Standards and applicability (includes NESHAP).
- 17.16.050 Visibility limiting standard.

Article III – Emissions from Existing and New Nonpoint Sources

- 17.16.060 Fugitive dust producing activities.
- 17.16.070 Fugitive dust emissions standards for motor vehicle operation.
- 17.16.080 Vacant lots and open spaces.
- 17.16.090 Roads and streets.
- 17.16.100 Particulate materials.
- 17.16.110 Storage piles.

Article IV – New and Existing Stationary Source Performance Standards

- 17.16.130 Applicability.
- 17.16.230 Standards of performance for storage vessels for petroleum liquids.
- 17.16.400 Organic solvents and other organic materials.
- 17.16.430 Standards of performance for unclassified sources.

Pima County Code Title 17, Chapter 17.20 – Emissions Source Testing and Monitoring

- 17.20.010 Source sampling, monitoring and testing.
- 17.20.040 Concealment of emissions.

Pima County Code Title 17, Chapter 17.24 – Emissions Source Recordkeeping and Reporting

- 17.24.020 Recordkeeping for compliance determination.
- 17.24.030 Recordkeeping for emission inventories
- 17.24.040 Reporting for compliance evaluations
- 17.24.050 Reporting as a permit requirement
- 17.24.060 Reporting for emission inventories

Article IV – Penalty for noncompliance

Pima County Code Title 17, Chapter 17.28 – Violations and Conditional Orders

- Article I – Violations** (inclusive)
- Article II – Conditional Orders** (inclusive)
- Article III – Circumvention** (inclusive)

ATTACHMENT 2:
APPROVED CAM PLANS

APPROVED CAM PLAN FOR VOC FOR LOADING RACKS
LR-1, LR-2, LR-3, LR-4, and LR-6
AND THE REFILLING OF DRAIN DRY TANKS
T-6, T-7, T-8, T-14, AND T-25
USING THE JOHN ZINK THERMAL OXIDIZER AS CONTROL DEVICE

[40 CFR 64.6(c)(1)]

[All provisions in this plan are Federally Enforceable & Material Permit Conditions]

§ 1 – BACKGROUND

1. Pollutant Specific Emissions Unit

a. *Description, Identification, and Facility:*

The vapor collection and processing system identified as the John Zink Thermal Oxidizer and associated equipment in Attachment 3, Table 5 for petroleum loading rack(s) LR-1, LR-2, LR-3, LR-4, & LR-6 to control and abate displaced volatile organic compounds (VOC) vapors from the filling of petroleum product delivery trucks located at the SFPP, L.P Tucson Terminal.

2. Applicable Regulation, Emission Limit, and Monitoring

a. *Regulations:*

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

40 CFR, Part 63, Subpart BBBBBB – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminal, Bulk Plants, and Pipeline Facilities

b. *Emission limits*

i. The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks shall not exceed 35 milligrams of total organic compounds (TOC) per liter of gasoline loaded. [40 CFR 60.502(b)]

ii. The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater. [40 CFR 60.112b(a)(3)(ii)] [40 CFR 63.11087(a), Table 1(2a)]

c. *Monitoring Requirements*

The Permittee shall conduct continuous combustion temperature monitoring when the thermal oxidizer is operating and conduct periodic source performance tests and operation and maintenance inspections.

3. Control Technology

Thermal Oxidizer manufactured by the John Zink Company

§ 2 – MONITORING APPROACH

[40 CFR 64.3(a)(1)]

The key elements of the monitoring approach are presented below:

4. Indicator:**a. Combustion Temperature**

Combustion temperature will be used as an indicator. The thermal oxidizer is operated in a cyclic manner. When sufficient vapor volume accumulates in the vapor storage tank, level controls on that tank open a valve, which allows vapor to be routed to the oxidizer and triggers the ignition sequence. Combustion at a temperature sufficient to oxidize the hydrocarbon vapors ensures destruction of VOC's.

b. Operation and Maintenance

To verify proper operation and efficiency of the thermal oxidizer the Permittee shall conduct periodic source performance testing and operation and maintenance inspections.

5. Measurement Approach**a. Combustion Temperature**

The combustion chamber temperature will be continuously monitored using a sensor consisting of a thermocouple mounted through the wall of the oxidizer chamber 11 feet above the unit base. The thermocouple is protected within a cast iron housing, shielded from direct contact with the flame. Temperature data will be continuously collected while the thermal oxidizer is operating using a data acquisition and handling system (DAHS).

b. Operation and Maintenance

i. The pilot train (natural gas) and ignition sequence, burner nozzles (3), temperature controller, detonation arrestor, secondary air/purge blower, and other functional aspects of the thermal oxidizer shall be inspected and maintained as recommended by the manufacturer or the Operations and Maintenance Plan. Failure to follow the manufacturer's recommended practices or the Operations and Maintenance Plan as described in Condition 40.d of this permit shall constitute an excursion.

ii. Periodic Source Performance Test

A source performance test of the thermal oxidizer and loading racks is conducted periodically to verify the VOC emissions are below the emission standard.

c. Indicator Range

[40 CFR 64.3(a)(2)]

Minimum Combustion Temperature

A minimum combustion temperature of 250°F shall be maintained in the thermal oxidizer during the period exhaust vapors from the vapor collection system are combusted in the thermal oxidizer. The monitoring system will be equipped with an alarm system to indicate a combustion temperature below 250°F. Any period following the ignition sequence when the combustion temperature falls below 250°F, while exhaust vapors are being routed to the thermal oxidizer, shall constitute an excursion. Failure to take corrective action as soon as practicable shall also constitute an excursion for the purposes of responding to and reporting excursions as provided in Conditions 47.c and 61.d of Part B of this permit. Each excursion as described in this paragraph, while providing valid monitoring data, shall constitute an exceedance and be reported as an excess emission in accordance with Condition 11 of this permit.

[Minimum Combustion temperature established from March 4, 2008 step test]

d. ***Quality Improvement Plan (QIP) Threshold***

[40 CFR 64.8(a)]

The QIP threshold is reached when the cumulative duration of excursions or exceedances exceeds 5% of the operating time for the thermal oxidizer for a reporting period as provided in Conditions 47.c and 62.b of this permit.

e. ***Performance Criteria***

[40 CFR 64.3(b) & 40 CFR 64.9(b)]

i. ***Data Representativeness***

[40 CFR 64.3(b)(1)]

(a) ***Combustion Temperature***

The combustion temperature shall be continuously monitored with data reduced and recorded as 1-minute average intervals in degrees Fahrenheit at all times when the thermal oxidizer is operating.

(b) ***Operation and Maintenance***(i) ***Annual Inspection***

Annual inspections records of the pilot train (natural gas) and ignition sequence, burner nozzles (3), temperature controller, detonation arrestor, secondary air/purge blower, and other functional aspects of the thermal oxidizer shall be maintained including any records of corrective actions or maintenance conducted.

(ii) ***Periodic Source Performance Test***

The most recent source performance test report with the combustion temperature shall be maintained.

ii. ***Quality Assurance/ Quality Control (QA/QC) Practices***

[40 CFR 64.3(b)(3) & 40 CFR 64.3(b)(4)]

- (a) The minimum acceptable accuracy of the thermocouple sensor shall be $\pm 20^{\circ}\text{F}$ or ± 1.0 percent of full scale, whichever is greater.
- (b) The minimum acceptable data availability requirement is 95% of the total operating time for a reporting period as provided Conditions 47.c and 62.b of this permit. Not complying with or maintaining the minimum acceptable data availability requirement shall constitute an excursion.
- (c) The temperature sensor/controller instrumentation shall be calibrated, maintained, and operated using procedures that take into account the manufacturer's specifications, to consist, in part, of instrument accuracy checks on an annual basis.

f. ***Monitoring Frequency and Data Collection Frequency***

[40 CFR 64.3(b)(4)]

i. ***Combustion Temperature***

The Permittee shall install and maintain a continuous monitoring device to record combustion temperature on a 1-minute rolling average period basis and any alarm condition when the combustion temperature drops below 250°F . The DAHS shall collect at least 2 samples for every 1 minute average interval. The data shall be continuously averaged, reduced, and recorded to 1- minute and 1-hour rolling averages. The data shall be recorded continuously on a strip chart or by a DAHS.

ii. *Operation and Maintenance*

- (a) The Permittee shall conduct an annual inspection of the thermal oxidizer before the anniversary date of the issuance of the permit, following the manufacturer's recommended practices or the Operations and Maintenance Plan.

- (b) *Periodic Source Performance test*

A source performance test of the thermal oxidizer and loading racks shall be conducted on the loading racks and thermal oxidizer once during the permit term to verify that the VOC emissions are below the standard and establish any changes to the minimum combustion temperature.

APPROVED CAM PLAN FOR VOC FOR LOADING RACK LR-5 USING THE JOHN ZINK VAPOR RECOVERY SYSTEM AS CONTROL DEVICE

[40 CFR 64.6(c)(1)]

[All standards are Federally Enforceable & Material Permit Conditions]

§ 1 – BACKGROUND

1. Pollutant Specific Emissions Unit

a. Description, Identification, and Facility:

The vapor collection and processing system identified as the John Zink Vapor Recovery System (VRS) and associated equipment in Attachment 3, Table 5 for petroleum loading rack LR-5 to control and abate displaced VOC vapors from the filling of petroleum product delivery trucks located at the SFPP, L.P Tucson Terminal.

2. Applicable Regulation, Emission Limit, and Monitoring

[Federally Enforceable & Material Permit Conditions]

a. Regulations:

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

40 CFR, Part 63, Subpart BBBBBB – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminal, Bulk Plants, and Pipeline Facilities

b. Emission limits:

i. The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks shall not exceed 35 milligrams of TOC (as a VOC surrogate) per liter of gasoline loaded (or 0.29 lbs/1000 gallons of gasoline loaded). [40 CFR 60.502(b)]

ii. Monitoring Requirements:

The Permittee shall conduct continuous monitoring of the hydrocarbon emissions when the VRS is operating, periodic QA checks, and periodic operation and maintenance inspections.

3. Control Technology

The control device is a VRS manufactured by the John Zink Company. The system consists of a carbon adsorption unit (CAU) made up of two granular activated carbon (GAC) beds, GAC bed vessels, control valves, exhaust outlets, and associated equipment. The VRS also incorporates GAC vessel regeneration and gasoline absorption circuits and associated equipment.

§ 2 – MONITORING APPROACH

[40 CFR 64.3(a)(1)]

The key elements of the monitoring approach are presented below:

4. Indicator**a. VOC Concentration**

The TOC concentration of the CAU exhaust vapors will be used as an indicator. The VRS is operated in a cyclic manner. On a controlled cycle period (typically 15 minutes) the two adsorber vessels alternate from adsorbing to regenerating mode. One adsorber is continuously available for vapor collection, while the second is being regenerated off-line in the regeneration and gasoline absorption circuit. The CAU vapor exhaust outlets are equipped with a VOC continuous emission monitoring system (CEMS) and data acquisition and handling system (DAHS). The CEMS is used to continuously measure the hydrocarbon concentration of the vapors exhausted from the CAU by drawing a sample from the outlet of the active adsorber vessel while the VRS is in operation. Operation of the VRS below the determined average concentration ensures compliance with the VOC emission limit.

b. Operation and Maintenance

- i. To verify proper operation and efficiency of the VRS the Permittee shall conduct periodic source performance testing and operation and maintenance inspections.
- ii. To verify proper operation and accuracy of the CEMS the Permittee shall conduct periodic quality assurance checks on the CEMS.

4. Measurement Approach**a. VOC Concentration**

The VOC concentration will be continuously monitored using an installed CEMS housed in a conditioned shelter, a set of calibration gases (zero and span for the inlet and outlet ranges), and a DAHS. VOC concentrations shall be continuously collected and measured from the exhaust vapors of the active adsorber vessel, while the VRS is operating.

b. Operation and Maintenance

- i. The condenser tank, carbon bed vessels and GAC, flow control valves, turbine meter, gasoline flow pump, regeneration vacuum pump, and functional aspects of the VRS shall be inspected and maintained as recommended by the manufacturer or the Operations and Maintenance Plan. Failure to follow the manufacturer's recommended practices or the Operations and Maintenance Plan as described in Condition 40.d of this permit shall constitute an excursion.
- ii. *Periodic Source Performance Test.*

A source performance test of the carbon adsorption unit (CAU) and loading rack shall be conducted to verify the VOC emissions are below the standard and the indicator does not require any changes.

6. **Indicator Range**

[40 CFR 64.3(a)(2)]

a. VOC Concentration

The 1-hour rolling average VOC concentration shall not go above 11,316 parts per million by volume (ppmv) measured as propane. The DAHS system will be equipped with an alarm system to indicate when the 1-hour rolling average VOC concentration goes above 11,316 ppmv (as propane). A 1-hour rolling average VOC concentration above this value, in itself, does not constitute an exceedance or violation of the VOC standard, but shall constitute an excursion. If the **1-hour rolling average** VOC concentration goes above 11,316 ppmv (as propane), the Permittee shall initiate an investigation of the control equipment within 25 hours for possible corrective action. If corrective action is required, the plant will proceed to implement such corrective action as soon as practicable. Failure to take corrective action as soon as practicable shall also constitute an excursion for the purposes of responding to and reporting excursions as provided in Conditions 47.c and 61.d of this permit.

b. Maximum VOC Concentration

A 6-hour rolling average VOC concentration above 11,316 ppmv (as propane) shall constitute an exceedance and violation of the VOC standard and be reported in accordance with Condition 11 of this Permit.

7. **Quality Improvement Plan (QIP) Threshold**

[40 CFR 64.8(a)]

The QIP threshold is reached when the cumulative duration of excursions or exceedances exceeds 5% of the operating time for the Vapor Recovery System for a reporting period as provided in Conditions 47.c and 61.d of this permit.

8. **Performance Criteria**

[40 CFR 64.3(b) & 40 CFR 64.9(b)]

a. *Data Representativeness*

[40 CFR 64.3(b)(1)]

i. *VOC Concentration*

The VOC concentration shall be continuously monitored with data sampled, reduced, and recorded at least once per minute in ppmv (as propane) at all times that the Vapor Recovery System is operating.

ii. *Operation and Maintenance*(a) *Annual VRS Inspection*

Annual inspections records of the condenser tank, carbon bed vessels and GAC, flow control valves, turbine meter, gasoline flow pump, regeneration vacuum pump, and functional aspects of the VRS shall be maintained including any records of corrective actions or maintenance conducted.

(b) *Periodic Source Performance Test*

The most recent source performance test report with data and engineering calculations to verify adequacy of the existing indicator ranges or designated conditions shall be maintained on site.

b. *Quality Assurance/ Quality Control (QA/QC) Practices*

[40 CFR 64.3(b)(3) & 40 CFR 64.3(b)(4)]

- i. The minimum acceptable sensitivity of the CEMS is based on the manufacturer's specification. The calibration of the CEMS shall be checked daily using a zero and span gas. The calibration drift is not to exceed the limit indicated in Quality Assurance Procedures, Appendix F to Part 60 and Performance Specification 8 or 8A, Appendix B to Part 60. Calibration drift in excess of the applicable limit shall constitute an excursion. [40 CFR 60 Appendix F, 5.1 & Appendix B, 8 or 8A]
- ii. A Cylinder Gas Audit (CGA) of the CEMS shall be conducted at least once each calendar quarter. Successive quarterly audits shall occur no closer than 2 months, per Appendix F to Part 60. A CGA is not required on the calendar quarter a RATA is performed. A CGA in excess of the applicable limit shall constitute an excursion. [40 CFR 60 Appendix F, 5.1]
- iii. A Relative Accuracy Test Audit (RATA) shall be conducted at least once every four calendar quarters per Quality Assurance Procedures, Appendix F to Part 60 and Performance Specification 8 or 8A to Appendix B to Part 60. A RATA in excess of the applicable limit shall constitute an excursion. [40 CFR 60 Appendix F, 5.1 & Appendix B, 8 or 8A]
- iv. The minimum acceptable data availability requirement for the CEMS is 95% of the total operating time for a reporting period as provided in Condition 47.c of this permit. Not complying with or maintaining the minimum acceptable data availability requirement shall constitute an excursion.
- v. The CEMS shall be manually calibrated, maintained and operated using procedures that take into account the manufacturer's specifications at least monthly.

9. *Monitoring Frequency and Data Collection Frequency*

[40 CFR 64.3(b)(4)]

a. *VOC concentration*

The Permittee shall install and maintain a CEMS and DAHS to measure and record VOC concentration of the CAU exhaust vapors on a 1-minute rolling average period basis, and any alarm condition, when the 1-hour rolling average concentration goes above 11,316 ppmv (as propane). The sample to be analyzed must pass through the measurement section of the analyzer without interruption. The analyzer shall measure the sample concentration at least once every 15 seconds. At least 1 sample concentration must be recorded for every 1 minute average interval. The data shall be continuously averaged, reduced, and recorded to 1-minute, and 1-hour rolling averages. The data shall be recorded continuously on the DAHS and/or plant DCS system.

b. *Operation and Maintenance*i. *Annual VRS Inspection*

The Permittee shall conduct an annual inspection of the VRS before the anniversary date of the issuance of the permit, following the manufacturer's recommended practices or the Operations and Maintenance Plan.

ii. *Periodic Source Performance Test*

A source performance test of the VRS and loading rack shall be conducted at least once during the term of the permit to verify the VOC emissions are below the standard and the indicator does not require any changes.

§ 2A – MONITORING APPROACH

[40 CFR 64.3(a)(1)]

10. Alternative Monitoring Approach per 40 CFR 63.11092(b)(1)(i)(B)(1)

[40 CFR 64.3(a)(1)]

The Permittee may use the following alternative monitoring approach during periods when the CEMS is out of control, inoperable, or otherwise off-line. The Permittee must still comply with the minimum data availability requirements and QIP thresholds for the CEMS as provided in Condition 7 and Condition 8.b.iv of this plan.

a. Daily Vacuum Levels during Carbon Regeneration Cycle

- i. The alternative monitoring indicator of the VRS performance is the vacuum level of each carbon bed during one complete regeneration cycle. A pressure transmitter in the vacuum pump suction line will be used to monitor the maximum vacuum level on each day of operation of the loading rack. This will be indicative of the proper operation of the carbon absorber unit and its efficiency of capturing vapors released from the loading rack's operation in a manner necessary to comply with the VOC emission standards. [40 CFR 64.3(a)(1) & 40 CFR 63.11092(b)(1)(i)(B)(1)(i)]
- ii. A vacuum level of 21 to 26 inches Hg during the carbon regeneration will be used as the indicator. A vacuum level of less than 21 inches Hg during the carbon regeneration cycle shall initiate a system shutdown and an investigation of the system for possible corrective action. [40 CFR 64.3(a)(3)]
- iii. To ensure quality-assured data is obtained, the vacuum sensor will be calibrated, maintained, and operated on a semiannual basis following the manufacturer's recommended practices. [40 CFR 64.3(b)(3)]

b. Measurement of VOC Emissions using Hand-Held Monitor

The VOC concentration from the VRS exhaust will be monitored using a hand-held monitor during the last 5 minutes of an adsorption cycle of each carbon bed and recording the highest measured concentration. The exhaust concentration will be monitored monthly with a portable analyzer to verify compliance with the VOC emission standard. This monitoring shall only be done during a loading operation. Non-methane hydrocarbon concentrations measured in parts per million will be converted to pounds of VOC/1000 gallons of gasoline loaded by using a conversion factor developed from the most recent source performance test. [40 CFR 64.3(a)(3) & 40 CFR 63.11092(b)(1)(i)(B)(1)(iii)]

c. Annual Inspections and Testing

An annual inspection of the equipment, including but not limited to, the carbon adsorbers and carbon, flow control valves, meters, pumps and other components will be conducted following the manufacturer's recommended practices. In addition, annual testing of each carbon bed in accordance with ASTM Method D-5228-92 will be performed. [40 CFR 64.3(b)(3) & 40 CFR 63.11092(b)(1)(i)(B)(1)(ii)]

ATTACHMENT 3:
EQUIPMENT LIST

EQUIPMENT LIST

Table 1 – Non-NSPS Storage Vessels and Equipment (Includes GD GACT affected facilities)

Tank ID	Product*	Roof	Closure Device Used Vapor Pressure - VP (psi)	Capacity (Gal)	Comment	Date
T-1	Multi (Gasoline)	External Floating	Double Deck; Primary Seal: Mechanical Shoe; Secondary Seal: Rim Mounted Compression Plate; VP > 1.5 psia	840,000	GD GACT	1955
T-2	Multi (Gasoline)	External Floating	Double Deck; Primary Seal: Mechanical Shoe; Secondary Seal: Rim Mounted Compression Plate; VP > 1.5 psia	701,904	GD GACT	1955
T-3	Multi (Gasoline)	External Floating	Double Deck; Primary Seal: Mechanical Shoe w/apron/wiper; Secondary Seal: Rim Mounted Compression Plate; VP > 1.5 psia	714,000	GD GACT	1955
T-4	Multi (Gasoline)	External Floating	Double Deck; Primary Seal: Mechanical Shoe /w Apron; Secondary Seal: Rim Mounted Compression Plate; VP > 1.5 psia	714,000	GD GACT	1955
T-5	Multi (Gasoline)	External Floating	Double Deck; Primary Seal: Mechanical Shoe Secondary Seal: Rim Mounted Compression Plate /w wiper; VP > 1.5 psia	714,000	GD GACT	1956
T-6	Multi (Gasoline)	External Floating	Pontoon; Primary Seal: Mechanical Shoe Secondary Seal: Rim Mounted Compression Plate; VP > 1.5 psia	2,100,000	GD GACT / (Drain-Dry Tank)	1957
T-7	Multi (Gasoline)	External Floating	Pontoon; Primary Seal: Mechanical Shoe; Secondary Seal: Rim Mounted Compression Plate w/ wiper; VP > 1.5 psia	2,100,000	GD GACT / (Drain-Dry Tank)	1957
T-8	Multi (Gasoline)	External Floating	Pontoon; Primary Seal: Mechanical Shoe; Secondary Seal: Rim Mounted Compression Plate w/ wiper; VP > 1.5 psia	2,100,000	GD GACT / (Drain-Dry Tank)	1958
T-9	Diesel	Fixed	Cone Roof; VP < 1.5 psia	651,000	-	1961
T-10	Diesel	Fixed	Cone Roof; VP < 1.5 psia	420,000	-	1956
T-11	Multi (Gasoline)	External Floating	Pontoon; Primary Seal: Mechanical Shoe; Secondary Seal: Rim Mounted Compression Plate; VP > 1.5 psia	420,000	GD GACT	1956
T-12	Diesel	Fixed	Cone Roof; VP < 1.5 psia	337,092	-	1953
T-13	Multi (Gasoline)	External Floating	Pontoon; Primary Seal: Mechanical Shoe; Secondary Seal: Wedge type double wiper; VP > 1.5 psia	420,000	GD GACT	1956
T-14	Multi (Gasoline)	External Floating	Double Deck; Primary Seal: Mechanical Shoe; Secondary Seal: Rim Mounted Compression Plate; VP > 1.5 psia	845,040	GD GACT / (Drain-Dry Tank)	1958
T-15	Diesel/Jet (JP-8)	Internal Floating	Floating Pan; Primary Seal: Mechanical Shoe Secondary Seal: Apron; VP < 1.5 psia	845,040	-	1960
T-16	Diesel	Internal Floating	Floating Pan; Primary Seal: Mechanical Shoe Secondary Seal: None; VP < 1.5 psia	2,520,000	-	1970
T-17	Multi (Gasoline)	External Floating	Pontoon; Primary Seal: Mechanical Shoe; Secondary Seal: Rim mounted Compression Plate; VP > 1.5 psia	1,680,000	GD GACT	1959
T-18	Ethanol (Gasoline)	Internal Floating	Aluminum floating pan; Primary Seal: Mechanical Shoe; Secondary Seal: Rim Mounted Compression Plate; VP 1.5 psia	268,800	-	1965
T-19	Multi (Gasoline)	External Floating	Pontoon; Primary Seal: Mechanical Shoe; Secondary Seal: Rim mounted Compression Plate; VP > 1.5 psia	1,260,000	GD GACT	1959
TC-21	Multi (Transmix)	Internal Floating	Aluminum floating Pan; Primary Seal: Foam wiper; Secondary Seal: None; VP > 1.5 psia	126,000	Out of Service	1955
TC-22	Additives	Fixed	Cone Roof; VP < 1.5	-	Out of Service	Pre-970
T-27	Diesel	Fixed	Cone Roof; VP < 1.5	615,594	-	1955
T-28	Multi (Gasoline)	Internal Floating – (Geod. Dome)	Pontoon; Primary Seal: Mechanical Shoe; Secondary Seal: Rim mounted Compression Plate w/ wiper; VP > 1.5 psia	1,008,000	GD GACT	1955

Tank ID	Product*	Roof	Closure Device Used Vapor Pressure - VP (psi)	Capacity (Gal)	Comment	Date
T-29	Multi (Gasoline)	Internal Floating	Floating Pan; Primary Seal: Wedge type/Double wiper; Secondary Seal: Wedge type/Double Wiper; VP > 1.5 psia	619,584	GD GACT	1967
T-30	Multi (Gasoline)	Internal Floating	Floating Pan; Primary Seal: Wedge type double wiper; Secondary Seal: Wedge type/Double Wiper; VP > 1.5 psia	603,414	GD GACT	1967
T-33	Multi (Gasoline)	Internal Floating – (Geodesic Dome)	Pontoon; Primary Seal: Mechanical Shoe; Secondary Seal: Rim mounted compression plate /w wiper; VP > 1.5 psia	1,390,200	GD GACT	1955
T-35	Multi (Gasoline)	External Floating	Double Deck; Primary Seal: Mechanical shoe; Secondary Seal: Rim mounted compression plate; VP > 1.5 psia	677, 502	GD GACT	1955
T-36	Multi (Gasoline)	Internal Floating	Primary Seal: Mechanical Shoe; Secondary Seal: Rim mounted compression plate; VP > 1.5 psia	381,780	GD GACT	1955
T-37	Diesel/Jet (Jet A)	Fixed	Cone Roof; VP < 1.5 psia	279,486	-	1955
T-38	Diesel/Jet (Jet A)	Fixed	Cone Roof; VP < 1.5 psia	204,372	-	1955
T-39	Diesel/Jet (Jet A)	Fixed	Cone Roof; VP < 1.5 psia	112,644	-	1955
T-40	Diesel/Jet (Jet A)	Fixed	Cone Roof; VP < 1.5 psia	446,964	-	1959
T-41	Multi (Gasoline)	External Floating	Pontoon; Primary Seal: Mechanical Shoe; Secondary Seal; Rim mounted compression plate; VP > 1.5 psia	445,872	GD GACT	1959
T-46 (Prev. 3001)	Diesel	Fixed	Cone Roof; VP < 1.5 psia	1,218,000	-	1957
T-49 (Prev. 1801)	Multi (Gasoline)	Internal Floating	Bolted Deck; Primary Seal: Mechanical Shoe; VP > 1.5 psia	756,000	GD GACT	1957
T-51 (Prev. 1601)	Multi (Gasoline)	Internal Floating	Welded Deck; Primary Seal: Mechanical Shoe; Secondary Seal: Rim Mounted; VP > 1.5 psia	672,000	GD GACT	1957
* Multi-Product (Multi) Tanks can contain any one of the following: Gasoline, Diesel, Jet Fuel, Ethanol; listed product in parentheses is the highest volatility product stored for purposes of calculating emission inventory. All Tanks that store Gasoline may also be used to store Transmix.						
Other Equipment	ID	Description	Capacity	Comment	Date	
Valves and Pumps in VOC service	N/A	Valves and Pumps	-	GD GACT as applicable	-	
Oil Water Separator Systems	OWS-1	Oil Water Separator System	Unknown	-	Unknown	
	OWS-2	Oil Water Separator System	Unknown	-	Unknown	
	OWS-3	Oil Water Separator System	Unknown	-	Unknown	
	OWS-4	Oil Water Separator System	Unknown	-	Unknown	
Pipeline Flow Meter- Prover	N/A	Prover Drainage Sump (subsurface)	-	-	-	
Ethanol Offloading Pump Sleeves	N/A	Truck offloading pump sleeves at LR-2, 3 & 4; Railcar offloading pump sleeves at LR5	-	-	-	
Off-spec products offloading pumps and equipment	N/A	Pumps at Loading Racks	-	-	-	
Onsite portable thermal oxidizer	N/A	Portable thermal oxidizer for use in degassing storage tanks	50 MM Btu/hr	-	Unknown	

Table 2 - Storage Vessels Subject to 40 CFR 60 Subpart K (Includes sources subject to GD GACT)

Tank ID	Product*	Roof	Closure Device Used Vapor Pressure - VP, (psi)	Capacity (Gal)	Comment	Date
T-47 (Prev. 3002)	Multi (Gasoline)	Internal Floating	Bolted Deck; Primary Seal: Mechanical Shoe; Secondary Seal: Rim-Mounted Compression Plate; VP > 1.5 psia	1,302,000	GD GACT; K	1977
T-48 (Prev. 3003)	Multi (Gasoline)	Internal Floating	Bolted Deck; Primary Seal: Mechanical Shoe; Secondary Seal: rim-mounted compression plate; VP > 1.5	1,302,000	GD GACT; K	1977
T-52 (Prev. 2001)	Ethanol	Internal Floating	Welded Deck; Primary Seal: Mechanical Shoe; Secondary Seal: Rim Mounted; VP > 1.5 psia	714,000	K	1977

* Multi-Product (Multi) Tanks can contain any one of the following: Gasoline, Diesel, Jet Fuel, or Ethanol; listed product in parentheses is the highest volatility product stored for purposes of calculating emission inventory. All Tanks that store Gasoline may also be used to store Transmix.

Table 3 - Storage Vessels Subject to 40 CFR 60 Subpart Kb (Includes sources subject to GD GACT)

Tank ID	Product*	Roof	Closure Device Used Vapor Pressure - VP (psi)	Capacity (Gal)	Comment	Date
T-20	Multi (Gasoline)	Internal Floating	Aluminum Floating Pan; Primary Seal: Continuous, Single tip wiper; Secondary Seal: None; VP: > 0.75 psia	1,260,000	GD GACT;	1959 Modified: 1979 & 1990
T-23	Multi (Gasoline)	Internal Floating	Floating Pan; Primary Seal: Mechanical Shoe; Secondary Seal: Compression Plate; VP > 0.75 psia	840,000	GD GACT	1992
T-25	Multi (Gasoline)	Internal Floating	Floating Pan /w Bulkheads; Primary Seal: Mechanical Shoe; Secondary Seal: Compression Plate; VP > 0.75 psia	2,100,000	GD GACT (Drain Dry Tank)	1997
T-26	Multi (Gasoline)	Internal Floating	Floating Pan; Primary Seal: Mechanical Shoe Secondary Seal: Compression Plate w/ wiper VP > 0.75 psia	2,832,690	GD GACT	1999
T-34	Multi (Gasoline)	Internal Floating	Floating Pan; Primary Seal: Mechanical Shoe Secondary Seal: Wiper w/ apron; VP > 0.75 psia	2,814,000	GD GACT	2000
T-42	Multi (Gasoline)	Internal Floating (Geodesic Dome)	Pontoon; Primary Seal: Mechanical Shoe; Secondary Seal: Rim Mounted Compression Plate; VP > 0.75 psia	969, 528	GD GACT	1963 / (Mod. 1998)
T-43	Multi (Gasoline)	Internal Floating	Primary Seal: Mechanical Shoe; Secondary Seal: Rim Mounted Compression Plate VP > 0.75 psia	686,910	GD GACT	1969 (Mod. 2001)
T-50 (Prev. 3004)	Multi (Gasoline)	Internal Floating	Bolted Deck; Primary Seal: Vapor Mounted; Secondary Seal: Rim Mounted; VP > 0.75 psia	1,218,000	GD GACT	1985

* Multi-Product Tanks (Multi) can contain any one of the following: Gasoline, Diesel, Jet Fuel, Ethanol; listed product in parentheses is the highest volatility product stored for purposes of calculating emission inventory. All Tanks that store Gasoline may also be used to store Transmix.

Table 4. Loading Racks Subject to 40 CFR 60 Subpart XX (Includes sources subject to GD GACT)

Rack ID	Description	Control Device	Comment	Date
LR-1	2 bays, 9 bottom-loading arms	John Zink Thermal Oxidizer	GD GACT	< 1980
LR-2	2 bays, 6 bottom-loading arms	John Zink Thermal Oxidizer	GD GACT	1989
LR-3	1 bay, 4 bottom-loading arms	John Zink Thermal Oxidizer	GD GACT	1999
LR-4	2 bays, 10 bottom-loading arms	John Zink Thermal Oxidizer	GD GACT	1984
LR-5	2-bays, 9 bottom-loading arms	John Zink Vapor Recovery System	GD GACT	Post 1980
LR-6	2 bays	John Zinc Thermal Oxidizer; or NAO Thermal Oxidizer as alternate device	GD GACT	1988
ID	Associated Equipment	Description		
Various	Vapor collection system equipment	Gasoline vapor collection piping, vapor bladder storage tank(s), pressure vacuum valves, saturator tanks, and other process vessels.	GD GACT	< 11/2006

Table 5. Air Pollution Control Equipment (Includes GD GACT affected facilities and PSEU's)

Description	Model Number	Serial/ ID Number	Date Installed	GD GACT Operating Parameters	PSEU Indicator Range
John Zink Thermal Oxidizer (For LR1-4 and LR-6)	ZCS-3-10-50-X- 2/8-2/8	VC- 9058337	February 2008	Combustion Temperature > 250°F	Combustion Temperature > 250°F
John Zink Vapor Recovery System (For LR5)	TBD	TBD	Post 1980	Concentration < 11,316 ppmv as propane (measured as a 6-hour rolling average)	Concentration < 11,316 ppmv as propane (measured as a 1-hour rolling average)
NAO Thermal Oxidizer (Alternate for LR6)	TBD	TBD	1988	Pilot Flame Indicator (Positive/Negative value to indicate if flame is on/off)	TBD At next permit renewal per 40 CFR 64 and Condition 33.b
Associated Equipment		Serial/ ID Number	Date Installed		
John Zink Vapor Recovery System CEMS & DAHS		TBD	Unknown		
John Zink Thermal Oxidizer Thermocouple & DAHS		TBD	Unknown		
NAO Thermal Oxidizer Pilot Flame Indicator & Recording System		TBD	Unknown		

ATTACHMENT 4:
INSIGNIFICANT ACTIVITIES

INSIGNIFICANT ACTIVITIES

1. Fuel additive tanks that store low vapor pressure fuel additives, including the following tanks: AIA-1, AIA-2, TA-3, TA-4, TA-20595, A-1, A-2, A-3, TA-600, T-135, T-136, TA-581, TA-630, TA-640, TA-314 and Red Dye Totes.
2. Railcar ethanol unloading station and other fuel additives at offloading stations, with the exception of ethanol emissions from pump sleeves at those stations, which are treated as point source emissions.
3. The following contact water storage tanks: OWS T-44, OWS T-45, Tank East, and Tank West that temporarily store processed water.
4. Water collection sumps and sump operations
5. Maintenance activities including replace loading arms and loading rack calibration.
6. Hand-held or manually operated equipment used for buffing polishing, carving, cutting, drilling, machining, routing, sanding, sawing, and surface grinding.
7. Preparation for a source test (installing flow meter)
8. Sampling of tanks and sample shelter activities.
9. Laboratory activities.
10. Routine minor repair or painting of facility equipment that does not constitute application of architectural coatings.
11. Landscaping, building maintenance, or janitorial activities.
12. Normal operation of customer trucks or facility-owned vehicles on paved roadways.
13. Stormwater pond/pit
14. Internal combustion (IC) engine-driven compressors, IC engine-driven electrical generator sets, and IC engine driven water pumps, used only for emergency replacement, facility maintenance, or standby service.
15. Trivial activities as defined in PCC 17.04.340.A.237 a through xx.
16. Any other activity which the Control Officer may determine need not, because of its emissions based on size or production rate, be included in an application in order to determine all applicable requirements and to calculate any fees under Title 17 of the Pima County Code.