Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Permit Evaluation
and
Statement of Basis
for
Minor Revision of

MAJOR FACILITY REVIEW PERMIT

for

ConocoPhillips – San Francisco Refinery
Facility #A0016

Facility Address:
1380 San Pablo Avenue
Rodeo, CA 94572

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1380 San Pablo Avenue
Rodeo, CA 94572

October 2010

Application Engineer: Kathleen Truesdell
Site Engineer: Brenda Cabral

Applications 22024 and 22568

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Title V Statement of Basis

A. Background

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the "potential to emit," as defined by BAAQMD Regulation 2-6-218, of more than 100 tons per year of a regulated air pollutant.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility identifier that consists of a letter and a 4-digit number. This identifier is also considered to be the identifier for the permit. The identifier for this facility is A0016.

This facility received its initial Title V permit on December 1, 2003. The permit was reopened and re-issued on December 16, 2004, April 12, 2005, and November 20, 2006. Minor revisions were issued on April 12, 2005, January 5, 2006, March 2, 2006, and October 15, 2007. Significant revisions were issued on January 5, 2006, January 18, 2007, October 31, 2008, June 18, 2009. Section X of the permit, Revision History, has a list of these revisions in chronological order.

This application is for a minor revision to the renewal Title V permit. This statement of basis will include all proposed changes to the permit in strikeout/underline format. This statement of basis addresses only the proposed changes to the permit. The statement of basis for the renewal permit issued on December 1, 2003 contains the basis for most of the rest of the permit. Additional issues were addressed in the documents for the revisions listed above.

The purpose of this revision is to include an Alternate Operating Scenario for S448 Internal Floating Roof Tank (Tank 1007) and to remove BAAQMD Condition 23843 for S506.

The alternative operating scenario for S448 will allow the tank to be exempt from BAAQMD Regulation 8, Rule 5, Storage of Organic Liquids, and NSPS 40 CFR 60, Subpart Kb, Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which

Construction, Reconstruction, or Modification Commenced After July 23, 1984, when the tank stores liquids with a vapor pressure less than 0.5 psia. Each time that the tank resumes operation as a tank that is subject to the standards, the owner/operator will perform all required inspections. Also, the owner/operator must record the status of the tank in a contemporaneous log when switching service.

BAAQMD Condition 23843 limits the vapor pressure of the liquid in S506. Since the tank has a natural gas blanket, pressure monitoring system, and is abated by A7, Vapor Recovery System, the limit is not necessary. The condition will be deleted to allow the owner/operator to store liquids with higher vapor pressures in the tank.

The details of the changes are in the engineering evaluations for NSR Application 22023 and NSR Application 22567, respectively, which are in Appendix B and which hereby are incorporated into this statement of basis.

B. Facility Description

This facility is an oil refinery. For a complete description, see the Statement of Basis for Application 9296.

C. Permit Content

The legal and factual basis for the permit revision follows. The permit sections are described in the order presented in the permit.

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities.

Changes to permit

There are no changes to Section I in this action.

II. Equipment

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S24).

Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Rule 2-1-302.

Significant sources are those sources that have a potential to emit of more than 2 tons of a "regulated air pollutant," as defined in BAAQMD Rule 2-6-222, per year or 400 pounds of a "hazardous air pollutant," as defined in BAAQMD Rule 2-6-210, per year.

All abatement (control) devices that control permitted or significant sources are listed. Each abatement device whose primary function is to reduce emissions is identified by an A and a number (e.g., A24). .

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Each of the permitted sources has previously been issued an authority to construct or a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These authorities to construct and permits are issued in accordance with state law and the District's regulations. The capacities in the permitted sources table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

The sources below are the subject of this application.

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
448	Tank 1007 (Blendstock Receiving)	internal floating roof	gasoline, diesel, others	243 thousand bbl
506	Tank 257	fixed roof	heavy uni-crackate	80 thousand bbl

Table II B – Abatement Devices

A#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency

Table II B – Abatement Devices

A#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
7	Vapor Recovery System (4 electrically driven compressors)	Tanks S135, S137. S139, S140, S168, S173, S174, S175, S182, S388, S433, S445, S446, S447, S506 (Sources S168, S173, S174~~, and S506~~ to be controlled by A7 in future)	BAAQMD 7-301, 7-302, 7-303	none	nuisance odors

Table II B – Abatement Devices

A#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
7	Vapor Recovery System (4 electrically driven compressors)	S135, S137, S139, S140, S168, S173, S174, S175, S182, S360, S449, S506 (Sources S168, S173, S174~~, and S506~~ to be controlled by A7 in future)	BAAQMD 8-5-306	None	95% overall control of emissions
7	Vapor Recovery System (4 electrically driven compressors)	S449	BAAQMD Condition 11219	None	vent emissions to the refinery fuel gas system
7	Vapor Recovery System (4 electrically driven compressors)	S433	BAAQMD Condition 7353	None	vent emissions to the refinery fuel gas system
7	Vapor Recovery System (4 electrically driven compressors)	S445	BAAQMD Condition 12130	None	vent emissions to the refinery fuel gas system
7	Vapor Recovery System (4 electrically driven compressors)	S446	BAAQMD Condition 12131	None	vent emissions to the refinery fuel gas system
7	Vapor Recovery System (4 electrically driven compressors)	S447	BAAQMD Condition 12132	None	vent emissions to the refinery fuel gas system
7	Vapor Recovery System (4 electrically driven compressors)	S182	BAAQMD Condition 13184	None	vent emissions to the refinery fuel gas system

Table II B – Abatement Devices

A#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
7	Vapor Recovery System (4 electrically driven compressors)	S135, S137, S139, S140, S148, S168, S173, S174, S175, S182, S360, S445, S449, S506, Tank 235, Tank 236 (Sources S168, S173, S174~~, and S506~~ to be controlled by A7 in future)	BAAQMD Condition 23724	Pressure	Various pressure settings between 1.5 and 2.2 inches of water

Changes to permit:

- Table II-A Description of S448 was changed to specify diesel is also stored in S448.

The basis for the above changes is set out in the engineering evaluation for Application 22023, which is attached in Appendix B.

- Table II-B S506 was removed from the "future" sources abated by A7 since S506 is operational and abated by A7.

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in

Sections IV and VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound) are placed in this section.

Unpermitted sources are exempt from normal District permits pursuant to an exemption in BAAQMD Regulation 2, Rule 1. They may, however, be specifically described in a Title V permit if they are considered significant sources pursuant to the definition in BAAQMD Rule 2-6-239.

Changes to permit
There are no changes to Section III in this action.

IV. Source-Specific Applicable Requirements

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules
- SIP Rules (if any) are listed following the corresponding District rules. SIP rules are District rules that have been approved by EPA for inclusion in the California State Implementation Plan. SIP rules are "federally enforceable" and a "Y" (yes) indication will appear in the "Federally Enforceable" column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the "Federally Enforceable" column will have a "Y" for "yes". If the SIP rule is not the current District rule, the SIP rule or the necessary portion of the SIP rule is cited separately after the District rule. The SIP portion will be federally enforceable; the non-SIP version will not be federally enforceable, unless EPA has approved it through another program.
- Other District requirements, such as the Manual of Procedures, as appropriate.
- Federal requirements (other than SIP provisions)
- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
- Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit.

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV. Section VII is a cross-reference between the limits and monitoring requirements. A discussion of monitoring is included in Section C.VII of this permit evaluation/statement of basis.

Changes to permit:

- Table IV-BB.9 was changed to Table IV-BB.9A to apply to S448 when storing materials subject to NSPS Kb and BAAQMD 8-5.

- BAAQMD Regulation 8-5-305.6 was added to Table IV-BB.9A since it was previously omitted.
- Table IV-BB.9B was added to apply to S448 when storing materials exempt from NSPS Kb and BAAAMD 8-5.
- Table IV-BB.11 was updated by removing references to future effective dates that have passed and deleting Condition 23843, which was removed in Application NSR 22567.
- Table IV-BB.11 BAAQMD 8-5-328.1.2 was corrected to 8-5-328.1 since 8-5-328.1.2 does not exist in BAAQMD 8-5 as amended on 10/18/2006.

Table IV – BB.9A
Source-Specific Applicable Requirements
NSPS Kb Zero-Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
S448 will be subject to the requirements of Table IV-BB.9A when storing materials subject to NSPS Kb and BAAQMD 8, Rule 5. S448 will be subject to the requirements of Table IV-BB.9B when storing materials exempt from NSPS Kb and BAAAMD 8, Rule 5.			
BAAQMD Regulation 8, Rule 5	**Organic Compounds, Storage of Organic Liquids (10/18/06) REQUIREMENTS FOR INTERNAL FLOATING ROOF TANKS**		
8-5-111	Limited Exemption, Tank Removal From and Return to Service	N	
8-5-111.1	Limited Exemption, Tank Removal From and Return to Service, Notification	N	
8-5-111.2	Limited Exemption, Tank Removal From and Return to Service; Tank in compliance at time of notification	N	
8-5-111.3	Limited Exemption, Tank Removal From and Return to Service; Filling, emptying, refilling floating roof tanks	N	
8-5-111.5	Limited Exemption, Tank Removal From and Return to Service; Minimize emissions and, if required, degas per 8-5-328	N	
8-5-111.6	Limited Exemption, Tank Removal From and Return to Service; Self report if out of compliance during exemption period	N	
8-5-112	Limited Exemption, Preventative Maintenance and Inspection of Tanks in Operation	N	
8-5-112.1	Limited Exemption, Preventative Maintenance and Inspection of Tanks in Operation; Notification	N	
8-5-112.2	Limited Exemption, Preventative Maintenance and Inspection of Tanks in Operation; Tank in compliance at time of notification	N	
8-5-112.3	Limited Exemption, Preventative Maintenance and Inspection of Tanks in Operation; No product movement, Minimize emissions	N	
8-5-112.4	Limited Exemption, Preventative Maintenance and Inspection of Tanks in Operation; Not to exceed 7 days	N	
8-5-112.5	Limited Exemption, Preventative Maintenance and Inspection of Tanks in Operation; Self report if out of compliance during exemption period	N	
8-5-112.6	Limited Exemption, Preventative Maintenance and Inspection of Tanks in Operation; Keep records for each exemption	N	
8-5-119	Limited Exemption, Repair Period for Enhanced Monitoring Program	N	
8-5-301	Storage Tank Control Requirements	N	
8-5-305	Requirements for Internal Floating Roof Tanks	N	
8-5-305.2	Requirements for Internal Floating roof tanks; Seals installed after 2/1/1993	Y	
8-5-305.3	Requirements for Internal Floating roof tanks; Viewports in fixed roof tank; not required if dome roof has translucent panels	Y	
8-5-305.4	Requirements for Internal Floating roof tanks; Tank fitting requirements	Y	
8-5-305.5	Requirements for Internal Floating roof tanks; Floating roof requirements	N	

Table IV – BB.9A
Source-Specific Applicable Requirements
NSPS Kb Zero-Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
8-5-305.6	Requirements for Internal Floating roof tanks; Tank shell in good operating condition	N	
8-5-320	Floating Roof Tank Fitting Requirements	N	
8-5-320.2	Floating Roof Tank Fitting Requirements; Projection below liquid surface	N	
8-5-320.3	Floating Roof Tank Fitting Requirements; Gasketed covers, seals, lids	N	
8-5-320.3.1	Floating Roof Tank Fitting Requirements; Gasketed covers, seals, lids - Gap requirements	Y	
8-5-320.3.2	Floatinf Roof Tank Fitting Requirements; Gasketed covers, seals, lids – Inaccessible openings on internal floating roof tanks	Y	
8-5-320.4	Floating Roof Tank Fitting Requirements; Solid sampling or gauging wells--	N	
8-5-320.4.1	Floating Roof Tank Fitting Requirements; Solid sampling or gauging wells--projection below liquid surface	Y	
8-5-320.4.2	Floating Roof Tank Fitting Requirements; Solid sampling or gauging wells--cover, seal, or lid	Y	
8-5-320.4.3	Floating Roof Tank Fitting Requirements; Solid sampling or gauging wells-- total secondary seal gap must include well gap	Y	
8-5-320.6	Floating Roof Tank Fitting Requirements; emergency roof drains must be 90% covered	N	
8-5-321	Primary seal requirements	N	
8-5-321.1	Primary seal requirements; No holes, tears, or other openings	Y	
8-5-321.2	Primary seal requirements; The seal shall be metallic shoe or liquid mounted except as provided in 8-5-305.1.3	Y	
8-5-321.3	Primary seal requirements; Metallic-shoe-type seal requirements	N	
8-5-321.3.1	Primary seal requirements; Metallic-shoe-type seal requirements - geometry of shoe	N	
8-5-321.3.2	Primary seal requirements; Metallic-shoe-type seal requirements - welded tanks gap requirements	N	
8-5-322	Secondary seal requirements	N	
8-5-322.1	Secondary seal requirements; No holes, tears, or other openings	N	
8-5-322.2	Secondary seal requirements; Insertion of probes	N	
8-5-322.5	Secondary seal requirements; Gap requirements for welded external floating roof tanks with seal installed after September 4, 1985	N	
8-5-322.6	Secondary seal requirements; extent of seal	N	
8-5-328	Tank degassing requirements	N	
8-5-328.1	Tank degassing requirements; Tanks > 75 cubic meters	N	
8-5-328.2	Tank degassing requirements; Ozone Excess Day Prohibition	N	
8-5-328.3	Tank degassing requirements; BAAQMD notification required	N	
8-5-402	Inspection Requirements for Internal Floating Roof Tanks	N	
8-5-402.1	Inspection Requirements for Internal Floating Roof Tanks; Primary and Secondary Seal Inspections	Y	
8-5-402.2	Inspection Requirements for Internal Floating Roof Tanks; Visual Inspection of Outer Most Seal	N	

Table IV – BB.9A
Source-Specific Applicable Requirements
NSPS Kb Zero-Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
8-5-402.3	Inspection Requirements for Internal Floating Roof Tanks; Tank Fitting Inspection	N	
8-5-404	Inspection, Abatement Efficiency Determination, and Source Test Reports	N	
8-5-411	Enhanced Monitoring Program (Optional)	N	
8-5-411.1	Enhanced Monitoring Program (Optional); Notify BAAQMD of tanks selected for enhanced monitoring program	N	
8-5-411.2	Enhanced Monitoring Program (Optional); Criteria for operating enhanced monitoring program	N	
8-5-411.3	Enhanced Monitoring Program (Optional); Performance requirements	N	
8-5-501	Records	N	
8-5-501.1	Records; Type and amount of liquid, type of blanket gas, TVP- Retain 24 months	N	
8-5-501.2	Records; Internal and External Floating Roof Tanks, Seal Replacement Records- Retain 10 years	N	
8-5-501.3	Records; Retention	N	
8-5-602	Analysis of Samples, True Vapor Pressure	Y	
8-5-604	Determination of Applicability Based on True Vapor Pressure	Y	
8-5-605	Measurement of Leak Concentration and Residual Concentrations	N	
8-5-605.1	Measurement of Leak Concentration and Residual Concentrations; EPA method 21 Instruments	N	
8-5-605.2	Measurement of Leak Concentration and Residual Concentrations; Method 21 and tank degassing residual organic concentration measurement method	N	
SIP Regulation 8, Rule 5	**Storage of Organic Liquids (06/05/2003)**		
8-5-111	Limited Exemption, Tank Removal From and Return to Service	Y	
8-5-111.1	Limited Exemption, Tank Removal From and Return to Service; Notice to the APCO	Y	
8-5-111.1.1	Limited Exemption, Tank Removal From and Return to Service; Notice to the APCO; 3 day prior notification	Y	
8-5-111.1.2	Limited Exemption, Tank Removal From and Return to Service; Notice to the APCO; Telephone notification	Y	
8-5-111.2	Limited Exemption, Tank Removal From and Return to Service; Compliance before notification	Y	
8-5-111.3	Limited Exemption, Tank Removal From and Return to Service; Floating roof tanks - continuous and quick filling, emptying and refilling	Y	
8-5-111.5	Limited Exemption, Tank Removal From and Return to Service; Minimization of emissions	Y	
8-5-111.6	Limited Exemption, Tank Removal From and Return to Service; Written notice of completion not required	Y	
8-5-111.7	Limited Exemption, Tank Removal From and Return to Service; Compliance with Section 8-5-328	Y	
8-5-112	Limited Exemption, Tanks in Operation	Y	

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NSPS Kb Zero-Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
8-5-112.1	Limited Exemption, Tanks in Operation; Notice to the APCO	Y	
8-5-112.1.1	Limited Exemption, Tanks in Operation; Notice to the APCO; 3 day prior notification	Y	
8-5-112.1.2	Limited Exemption, Tanks in Operation; Notice to the APCO; Telephone notification	Y	
8-5-112.2	Limited Exemption, Tanks in Operation; Compliance and certification before commencement of work per 8-5-404	Y	
8-5-112.3	Limited Exemption, Tanks in Operation; No product movement; minimization of emissions	Y	
8-5-112.4	Limited Exemption, Tanks in Operation; Exemption does not exceed 7 days	Y	
8-5-301	Storage Tank Control Requirements (internal floating roof, external floating roof, or approved emission control system)	Y	
8-5-305	Requirements for Internal Floating roofs	Y	
8-5-305.5	Requirements for Internal Floating roofs; Floating roof requirements	Y	
8-5-320	Tank fitting requirements; Floating roof tanks	Y	
8-5-320.2	Tank fitting requirements; Floating roof tanks; Projection below liquid surface	Y	
8-5-320.3	Tank fitting requirements; Floating roof tanks; Gasketed covers, seals, lids	Y	
8-5-320.4	Tank fitting requirements; Floating roof tanks; Solid sampling or gauging wells	Y	
8-5-320.6	Tank Fitting Requirements; Emergency roof drain	Y	
8-5-321	Primary seal requirements	Y	
8-5-321.3	Primary seal requirements; Metallic shoe type seals requirements	Y	
8-5-321.3.1	Primary seal requirements; Metallic shoe type seals requirements; Geometry of shoe	Y	
8-5-321.3.2	Primary seal requirements; Metallic shoe type seals requirements; Gaps for welded tanks	Y	
8-5-322	Secondary seal requirements	Y	
8-5-322.1	Secondary seal requirements; No holes, tears, or other openings	Y	
8-5-322.2	Secondary seal requirements; Insertion of probes	Y	
8-5-322.5	Secondary seal requirements; Gaps for welded tanks with seals installed after 2/1/93	Y	
8-5-322.6	Secondary seal requirements; Extent of seal	Y	
8-5-328	Tank degassing requirements	Y	
8-5-328.1	Tank degassing requirements; tanks > 75 cubic meters	Y	
8-5-328.1.2	Tank degassing requirements; tanks > 75 cubic meters; Concentration of <10,000 ppm as methane after degassing	Y	
8-5-328.2	Tank degassing requirements; Ozone excess day prohibition	Y	
8-5-402	Inspection Requirements for Internal Floating Roof Tanks	Y	
8-5-402.2	Inspection Requirements for Internal Floating Roof Tanks; Visual Inspection of Outer Most Seal	Y	
8-5-402.3	Inspection Requirements for Internal Floating Roof Tanks; Tank Fitting Inspection	Y	

Table IV – BB.9A
Source-Specific Applicable Requirements
NSPS Kb Zero-Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
8-5-404	Certification	Y	
8-5-405	Information required	Y	
8-5-501	Records	Y	
8-5-501.1	Records; Type and amounts of liquid; true vapor pressure; Retain 24 months	Y	
8-5-501.2	Records; Internal and External Floating Roof Tanks; Seal Replacement Records – Retain 10 years	Y	
8-5-503	Portable hydrocarbon detector	Y	
40 CFR 60, Subpart Kb	**Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (10/15/03)** **REQUIREMENTS FOR INTERNAL FLOATING ROOF TANKS**		
60.110b(a)	Applicability and Designation of Affected Facility; Volatile organic liquid storage vessels > or = to 40 cu m, after 7/23/1984	Y	
60.112b(a)	Standard for Volatile Organic Compounds (VOC); Requirement for tanks- > 151 cu m with maximum TVP >=5.2 kPa and <76.6; or >= 75 cu m and < 151 cu m with maximum TVP >= 27.6 kPa and < 76.6 kPa	Y	
60.112b(a)(1)	Standard for Volatile Organic Compounds (VOC); Fixed roof with internal floating roof option	Y	
60.112b(a)(1)(i)	Standard for Volatile Organic Compounds (VOC); Internal floating roof requirements	Y	
60.112b(a)(1)(ii)	Standard for Volatile Organic Compounds (VOC); Internal floating roof seal requirements	Y	
60.112b(a)(1)(ii)(B)	Standard for Volatile Organic Compounds (VOC); Internal floating roof double seal option	Y	
60.112b(a)(1)(iii)	Standard for Volatile Organic Compounds (VOC); Internal floating roof openings-projections below roof surface	Y	
60.112b(a)(1)(iv)	Standard for Volatile Organic Compounds (VOC); Internal floating roof openings covers	Y	
60.112b(a)(1)(v)	Standard for Volatile Organic Compounds (VOC); Internal floating roof automatic bleeder vents	Y	
60.112b(a)(1)(vi)	Standard for Volatile Organic Compounds (VOC); Internal floating roof rim space vents	Y	
60.112b(a)(1)(vii)	Standard for Volatile Organic Compounds (VOC); Internal floating roof sampling penetrations	Y	
60.112b(a)(1)(viii)	Standard for Volatile Organic Compounds (VOC); Internal floating roof support column penetrations	Y	
60.112b(a)(1)(ix)	Standard for Volatile Organic Compounds (VOC); Internal floating roof ladder penetrations	Y	
60.113b(a)(1)	Testing and Procedures; Internal floating roof visual inspection before filling. Repair any defects found during inspection before filling.	Y	

Table IV – BB.9A
Source-Specific Applicable Requirements
NSPS Kb Zero-Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
60.113b(a)(2)	Testing and Procedures; Internal floating roof tanks with liquid mounted or mechanical shoe primary seal, annual visual inspection through manholes and hatches (if complying with 40 CFR 60.113b(a)(3)(ii))	Y	
60.113b(a)(3)	Testing and Procedures; Internal floating roof with double seal system, inspection requirements	Y	
60.113b(a)(3)(ii)	Testing and Procedures; Internal floating roof with double seal system, inspection requirements - visually inspect per 40 CFR 60.113b(a)(2) annually and per 40 CFR 60.113b(a)(4) every 10 years.	Y	
60.113b(a)(4)	Testing and Procedures; Internal floating roof inspection requirements each time tank is emptied and degassed (10 year intervals if complying with 40 CFR 60.113b(a)(3)(ii))	Y	
60.113b(a)(5)	Testing and Procedures; Internal floating roof, 30 day notification for filling after inspection	Y	
60.115b	Reporting and Recordkeeping Requirements; 60.112b(a) tanks; Record retention	Y	
60.115b(a)	Reporting and Recordkeeping Requirements; 60.112b(a) internal floating roof tanks	Y	
60.115b(a)(1)	Reporting and Recordkeeping Requirements; 60.112b(a) internal floating roof control equipment description and certification	Y	
60.115b(a)(2)	Reporting and Recordkeeping Requirements; 60.112b(a) internal floating roof inspection records	Y	
60.115b(a)(3)	Reporting and Recordkeeping Requirements; 60.112b(a) internal floating roof annual inspection defects report	Y	
60.115b(a)(4)	Reporting and Recordkeeping Requirements; 60.112b(a) internal floating roof double seal system inspection defects report	Y	
60.116b(a)	Monitoring of Operations; Record retention	Y	
60.116b(b)	Monitoring of Operations; Permanent record requirements	Y	
60.116b(c)	Monitoring of Operations; VOL storage record requirements	Y	
60.116b(e)	Monitoring of Operations; Determine TVP	Y	
60.116b(e)(2)	Monitoring of Operations; Determine TVP-crude oil and refined petroleum	Y	
40 CFR 63, Subpart CC	**National Emission Standards for Hazardous Air Pollutants for Petroleum Refining (6/23/03) REQUIREMENTS FOR INTERNAL FLOATING ROOF TANKS ALSO SUBJECT TO NSPS, Subpart Kb**		
63.640(c)(2)	Applicability and Designation of Storage Vessels	Y	
63.640(n)(1)	Applicability and Designation of Affected Source Overlap for Storage Vessels-Existing Group 1 or Group 2 also subject to Kb only subject to Kb and 63.640(n)(8).	Y	
63.640(n)(8)	Applicability and Designation of Affected Source Overlap for Storage Vessels-Additional requirements for Kb storage vessels	Y	
63.640(n)(8)(ii)	Applicability and Designation of Affected Source Overlap for Storage Vessels-Additional requirements for Kb storage vessels	Y	
63.640(n)(8)(iii)	Applicability and Designation of Affected Source Overlap for Storage Vessels-Additional requirements for Kb storage vessels	Y	

Table IV – BB.9A
Source-Specific Applicable Requirements
NSPS Kb Zero-Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
63.640(n)(8)(iv)	Applicability and Designation of Affected Source Overlap for Storage Vessels-Additional requirements for Kb storage vessels	Y	
63.640(n)(8)(v)	Applicability and Designation of Affected Source Overlap for Storage Vessels-Additional requirements for Kb storage vessels	Y	
BAAQMD Condition 12133			
Part 1	Annual throughput limit [Basis: Cumulative Increase]	Y	
Part 2	Requirements for tank openings [Basis: Cumulative Increase]	Y	
Part 3	Monthly throughput records [Basis: Cumulative Increase]	Y	
Part 4	Alternate Operating Scenario	Y	
Part 4a	Log of the stored material [Basis: 40 CFR 70.6(a)(9), BAAQMD Regulation 2-6-409.7]	Y	
Part 4b	Notification requirement for refilling with Reg. 8-5- or NSPS Subpart Kb – regulated material	Y	
Part 4c	Inspection requirement prior to refilling with Reg. 8-5- or NSPS Subpart Kb – regulated material	Y	

Table IV – BB.9B
Source-Specific Applicable Requirements
NSPS Kb Zero-Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
S448 will be subject to the requirements of Table IV-BB.9A when storing materials subject to NSPS Kb and BAAQMD 8, Rule 5. S448 will be subject to the requirements of Table IV-BB.9B when storing materials exempt from NSPS Kb and BAAAMD 8, Rule 5.			
BAAQMD Regulation 8, Rule 5	**Organic Compounds, Storage of Organic Liquids (10/18/06) EXEMPT**		
8-5-117	Limited Exemption, Low Vapor Pressure	N	
SIP Regulation 8, Rule 5	**Organic Compounds, Storage of Organic Liquids (6/5/03) EXEMPT**		
8-5-117	Exemption, Low Vapor Pressure	Y	
40 CFR 60, Subpart Kb	**Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (10/15/2003)**		
60.110b(a)	Applicability and Designation of Affected Facility; Volatile organic liquid storage vessels > or = to 40 cu m, after 7/23/1984	Y	

Table IV – BB.9B
Source-Specific Applicable Requirements
NSPS Kb Zero-Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
60.110b(b)	Applicability and Designation of Affected Facility – Exemption for low vapor pressure; NSPS Kb does not apply to vessels with capacity > 151 cu m and TVP < 3.5 kPa or to vessels with capacity >= 75 cu m and <= 151 cu m and TVP < 15.0 kPa	Y	
40 CFR 63, Subpart CC	**National Emission Standards for Hazardous Air Pollutants for Petroleum Refining (6/23/2003) REQUIREMENTS FOR GROUP 2 RECORDKEEPING ONLY**		
63.640(c)(2)	Applicability and Designation of Storage Vessels	Y	
63.646(b)(1)	Storage Vessel Provisions-Determine stored liquid % OHAP for group determination	Y	
63.646(b)(2)	Storage Vessel Provisions-Determine stored liquid % OHAP-method 18 to resolve disputes	Y	
63.655(h)(6)	Reporting and Recordkeeping Requirements-Other reports-Determination of Applicability	Y	
63.655(h)(6)(ii)	Reporting and Recordkeeping Requirements-Other reports-Determination of Applicability	Y	
63.655(i)(1)	Reporting and Recordkeeping Requirements-Recordkeeping for storage vessels – Keep records specified in 40 CFR 63.123	Y	
63.655(i)(1)(iv)	Reporting and Recordkeeping Requirements-Recordkeeping for storage vessels – Data and assumptions used to determine Group 2 classification	Y	
63.655(i)(5)	Reporting and Recordkeeping Requirements-Recordkeeping--Record retention – 5 years	Y	
BAAQMD Condition 12133			
Part 1	Annual throughput limit [Basis: Cumulative Increase]	Y	
Part 2	Requirements for tank openings [Basis: Cumulative Increase]	Y	
Part 3	Monthly throughput records [Basis: Cumulative Increase]	Y	
Part 4	Alternate Operating Scenario	Y	
Part 4a	Log of the stored material [Basis: 40 CFR 70.6(a)(9), BAAQMD Regulation 2-6-409.7]	Y	
Part 4b	Notification requirement for refilling with Reg. 8-5- or NSPS Subpart Kb – regulated material	Y	
Part 4c	Inspection requirement prior to refilling with Reg. 8-5- or NSPS Subpart Kb – regulated material	Y	
BAAQMD Condition 20773			
Part 1	Requirement to verify exempt status of tank based on true vapor pressure of contents [Basis: Regulation 8-5-117, 2-6-409.2]	Y	
Part 2	Record retention requirement [Basis: Regulation 2-6-409.2]	Y	

Table IV – BB.11
Source-Specific Applicable Requirements
NSPS Kb Fixed Roof Tanks with Vapor Recovery to Fuel Gas
S135 (Tank 200), S360 (Tank 223), S445 (Tank 271), S449 (Tank 285)
S506 (Tank 257)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
~~Tank S506 will be subject to the requirements in Table IV-BB.11 upon startup.~~			
BAAQMD Regulation 1	**General Provisions and Definitions (7/9/08)**		
1-523	Parametric Monitoring and Recordkeeping Procedures	N	~~1/5/08 for S360, S445, S449~~ ~~7/5/09 for S135~~ ~~Upon comple-tion of construc-tion for S506~~
1-523.1	Parametric monitor periods of inoperation	Y	~~1/5/08 for S360, S445, S449~~ ~~7/5/09 for S135~~ ~~Upon comple-tion of construc-tion for S506~~
1-523.2	Limits on periods of inoperation	Y	~~1/5/08 for S360, S445, S449~~ ~~7/5/09 for S135~~ ~~Upon comple-tion of construc-tion for S506~~

Table IV – BB.11
Source-Specific Applicable Requirements
NSPS Kb Fixed Roof Tanks with Vapor Recovery to Fuel Gas
S135 (Tank 200), S360 (Tank 223), S445 (Tank 271), S449 (Tank 285)
S506 (Tank 257)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
1-523.3	Reports of Violations	N	~~1/5/08 for S360, S445, S449~~ ~~7/5/09 for S135~~ ~~Upon comple-tion of construc-tion for S506~~
1-523.4	Records	Y	~~1/5/08 for S360, S445, S449~~ ~~7/5/09 for S135~~ ~~Upon comple-tion of construc-tion for S506~~
1-523.5	Maintenance and calibration	N	~~1/5/08 for S360, S445, S449~~ ~~7/5/09 for S135~~ ~~Upon comple-tion of construc-tion for S506~~
SIP Regulation 1	**General Provisions and Definitions (6/28/99)**		
1-523	Parametric Monitoring and Recordkeeping Procedures	Y[1]	~~1/5/08 for S360, S445,~~

Table IV – BB.11
Source-Specific Applicable Requirements
NSPS Kb Fixed Roof Tanks with Vapor Recovery to Fuel Gas
S135 (Tank 200), S360 (Tank 223), S445 (Tank 271), S449 (Tank 285)
S506 (Tank 257)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
			~~S449~~ ~~7/5/09 for S135~~ ~~Upon comple-tion of construc-tion for S506~~
1-523.3	Reports of Violations	Y[1]	~~1/5/08 for S360, S445, S449~~ ~~7/5/09 for S135~~ ~~Upon comple-tion of construc-tion for S506~~
BAAQMD Regulation 8, Rule 5	**Organic Compounds, Storage of Organic Liquids (10/18/06) REQUIREMENTS FOR FIXED ROOF TANKS**		
8-5-111	Limited Exemption, Tank Removal From and Return to Service	N	
8-5-111.1	Limited Exemption, Tank Removal From and Return to Service; Notice to the APCO	N	
8-5-111.1.1	Limited Exemption, Tank Removal From and Return to Service; Notice to the APCO; 3 day prior notification	N	
8-5-111.1.2	Limited Exemption, Tank Removal From and Return to Service; Notice to the APCO; Telephone notification	Y	
8-5-111.2	Limited Exemption, Tank Removal From and Return to Service; Compliance before notification	N	
8-5-111.4	Limited Exemption, Tank Removal From and Return to Service; Use of vapor recovery	Y	
8-5-111.5	Limited Exemption, Tank Removal From and Return to Service; Minimization of emissions	N	
8-5-112	Limited Exemption, Preventative Maintenance and Inspection of Tanks in Operation	N	
8-5-112.1	Limited Exemption, Tanks in Operation; Notice to the APCO	N	
8-5-112.1.1	Limited Exemption, Tanks in Operation; Notice to the APCO; 3 day prior notification	N	

Table IV – BB.11
Source-Specific Applicable Requirements
NSPS Kb Fixed Roof Tanks with Vapor Recovery to Fuel Gas
S135 (Tank 200), S360 (Tank 223), S445 (Tank 271), S449 (Tank 285)
S506 (Tank 257)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
8-5-112.1.2	Limited Exemption, Tanks in Operation; Notice to the APCO; Telephone notification	N	
8-5-112.2	Limited Exemption, Tanks in Operation; Compliance and certification before commencement of work	N	
8-5-112.3	Limited Exemption, Tanks in Operation; No product movement; minimization of emissions	Y	
8-5-112.4	Limited Exemption, Tanks in Operation; Exemption does not exceed 7 days	N	
8-5-112.6	Tank Records	N	
8-5-301	Storage Tank Control Requirements (internal floating roof, external floating roof, or approved emission control system)	N	
8-5-303	Requirements for Pressure Vacuum Valves	N	
8-5-303.1	Requirements for Pressure Vacuum Valves; Set pressure	N	
8-5-303.2	Requirements for Pressure Vacuum Valves; Installation, maintenance, operation	N	
8-5-306	Requirements for Approved Emission Control Systems	N	
8-5-307	Requirements for Fixed Roof Tanks, Pressure Tanks, and Blanketed Tanks	N	
8-5-307.1	Shell in good condition with no leakage	N	
8-5-328	Tank Degassing Requirements	N	
8-5-328.1	Tank Degassing Requirements; Tanks > 75 cubic meters	N	
8-5-328.1~~.2~~	Tank Degassing Requirements; Tanks > 75 cubic meters; Concentration of <10,000 ppm as methane after degassing	N	
8-5-328.2	Tank degassing requirements; Ozone excess day prohibition	N	
8-5-328.3	Notification of degassing	N	
8-5-331	Tank Cleaning Requirements	N	
8-5-332	Sludge Handling Requirements	N	
8-5-403	Inspection Requirements for Pressure Relief Devices	N	
8-5-404	Inspection, Abatement Efficiency Determination and Source Test Reports	N	
8-5-501	Records	N	
8-5-501.1	Records; Type and amounts of liquid; true vapor pressure; Retain 24 months	N	
8-5-501.3	Records retained for 24 months	N	
8-5-501.4	Engineering data sheets showing setpoints for pressure vacuum valves installed after 6/1/07	N	
8-5-602	Analysis of Samples, True Vapor Pressure	N	
8-5-603	Determination of emissions	N	
8-5-603.1	Determination of Emissions; Organic compounds specified in 8-5-306	N	
8-5-604	Determination of Applicability	N	
8-5-605	Pressure Vacuum Valve Gas Tight Determination	N	
SIP Regulation 8 Rule 5	Organic Compounds, Storage of Organic Liquids (6/5/03)		
8-5-111.1	Limited Exemption, Tank Removal From and Return to Service,	Y	

Table IV – BB.11
Source-Specific Applicable Requirements
NSPS Kb Fixed Roof Tanks with Vapor Recovery to Fuel Gas
S135 (Tank 200), S360 (Tank 223), S445 (Tank 271), S449 (Tank 285)
S506 (Tank 257)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
	Notification		
8-5-111.2	Limited Exemption, Tank Removal From and Return to Service, Tank in compliance prior to notification	Y	
8-5-111.5	Limited Exemption, Tank Removal From and Return to Service, Minimize emissions	Y	
8-5-111.6	Limited Exemption, Tank Removal From and Return to Service, Notice of completion not required	Y	
8-5-111.7	Limited Exemption, Tank Removal From and Return to Service, Satisfy requirements of 8-5-328	Y	
8-5-112	Limited Exemption, Preventative Maintenance and Inspection of Tanks in Operation	Y	
8-5-112.1	Limited Exemption, Tanks in Operation, Notification	Y	
8-5-112.1.1	Limited Exemption, Tanks in Operation, Notification, 3 day prior notification	Y	
8-5-112.1.2	Limited Exemption, Tanks in Operation, Notification, Telephone notification	Y	
8-5-112.2	Limited Exemption, Tanks in Operation, Tank in compliance prior to start of work. Certified per 8-5-404	Y	
8-5-301	Storage Tank Control Requirements (internal floating roof, external floating roof, or approved emission control system)	Y	
8-5-303	Requirements for Pressure Vacuum Valves (applies only to S107 (Tank 150), S110 (Tank 155), S115 (Tank 160), S123 (Tank 168), S128 (Tank 174), S129 (Tank 180), S178 (Tank 288))	Y	
8-5-306	Requirements for Approved Emission Control Systems	Y	
8-5-328	Tank Degassing Requirements	Y	
8-5-328.1	Tank Degassing Requirements; Tanks > 75 cubic meters	Y	
8-5-328.1.2	Tank Degassing Requirements; Tanks > 75 cubic meters; Concentration of <10,000 ppm as methane after degassing	Y	
8-5-328.2	Tank degassing requirements; Ozone excess day prohibition	Y	
8-5-328.3	Notification of degassing	N	
8-5-331	Tank Cleaning Requirements	N	
8-5-332	Sludge Handling Requirements	N	
8-5-403	Inspection Requirements for Pressure Vacuum Valves	Y	
8-5-404	Certification	Y	
8-5-503	Portable hydrocarbon detector	Y	
8-5-603	Determination of emissions	Y	
8-5-603.1	Determination of Emissions; Organic compounds specified in 8-5-306	Y	
8-5-604	Determination of Applicability	Y	
8-5-605	Pressure Vacuum Valve Gas Tight Determination	Y	
40 CFR 60, Subpart Kb	**Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 (10/15/2003) REQUIREMENTS FOR FIXED ROOF TANKS**		
60.110b(a)	Applicability and Designation of Affected Facility; Volatile organic	Y	

Table IV – BB.11
Source-Specific Applicable Requirements
NSPS Kb Fixed Roof Tanks with Vapor Recovery to Fuel Gas
S135 (Tank 200), S360 (Tank 223), S445 (Tank 271), S449 (Tank 285)
S506 (Tank 257)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
	liquid storage vessels > or = to 40 cu m, after 7/23/1984		
60.112b(a)(3)	Standard for Volatile Organic Compounds (VOC); Closed vent system and control device	Y	
60.112b(a)(3)(i)	Standard for Volatile Organic Compounds (VOC); Closed vent system and control device no detectable emissions per 60.485(b) (Subpart VV)	Y	
60.112b(a)(3)(ii)	Standard for Volatile Organic Compounds (VOC); Closed vent system and control device >= 95% inlet VOC emission reduction	Y	
60.113b(c)	Testing and Procedures; Closed vent system and control device (not flare)	Y	
60.113b(c)(1)	Testing and Procedures; Closed vent system and control device (not flare) operating plan submission	Y	
60.113b(c)(1)(i)	Testing and Procedures; Closed vent system and control device (not flare) operating plan--efficiency demonstration	Y	
60.113b(c)(1)(ii)	Testing and Procedures; Closed vent system and control device (not flare) operating plan--monitoring parameters	Y	
60.113b(c)(2)	Testing and Procedures; Closed vent system and control device (not flare) operate in accordance with operating plan	Y	
60.115b	Reporting and Recordkeeping Requirements; 60.112b(a) tanks; Record retention	Y	
60.115b(c)	Reporting and Recordkeeping Requirements; Closed vent system and control device (not flare)	Y	
60.115b(c)(1)	Reporting and Recordkeeping Requirements; Closed vent system and control device (not flare) operating plan copy – Retain for life of control device	Y	
60.115b(c)(2)	Reporting and Recordkeeping Requirements; Closed vent system and control device (not flare) operating records – Retain for at least 2 years	Y	
60.116b(a)	Monitoring of Operations; Record retention	Y	
60.116b(b)	Monitoring of Operations; Permanent record requirements	Y	
60.116b(e)	Monitoring of Operations; Determine TVP	Y	
60.116b(e)(2)	Monitoring of Operations; Determine TVP-crude oil or refined petroleum products	Y	
60.116b(g)	Monitoring of Operations; Exemption from 60.116b(c) and 60.116b(d) for tanks with closed vent system and control device	Y	
40 CFR 63, Subpart CC	**National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries (06/23/2003) EXEMPTION FOR TANKS VENTED TO FUEL GAS SYSTEM**		
63.640(c)(2)	Applicability and Designation of Storage Vessels	Y	
63.640(d)(5)	Exemption for emission points routed to fuel gas system	Y	
BAAQMD Condition 11219	**APPLICABLE TO S449**		
Part 1	Requirement to vent emissions to fuel gas system [Basis: Cumulative Increase]	Y	
BAAQMD Condition 12130	**APPLICABLE TO S445**		
Part 1	Requirement to vent emissions to fuel gas system [Basis: Cumulative Increase]	Y	

Table IV – BB.11
Source-Specific Applicable Requirements
NSPS Kb Fixed Roof Tanks with Vapor Recovery to Fuel Gas
S135 (Tank 200), S360 (Tank 223), S445 (Tank 271), S449 (Tank 285)
S506 (Tank 257)

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforce-able (Y/N)	Future Effective Date
BAAQMD Condition 20989, Part A	Throughput limit for source S360 [Basis: 2-1-234.3]	Y	
BAAQMD Condition 22518	**APPLICABLE TO S135**		
Part 1	Vapor pressure limit [Cumulative increase]	Y	
Part 3	Throughput limit [Cumulative increase]	Y	
Part 4	Control requirement [Cumulative increase]	Y	
Part 5	Prohibition on tank cleaning when switching products [Cumulative increase]	Y	
BAAQMD Condition 23724			
Part 1a	Requirement for abatement by A7, Odor Abatement System [2-1-403]	Y	~~Upon startup for S506~~
Part 2	Requirement for utility-grade natural gas blanket [2-1-403]	Y	
Part 3	Requirement for pressure monitoring device for S135 by 7/5/09. [2-1-403]	Y	~~7/5/09~~
Part 4	After pressure monitoring devices are installed, requirement to operate below tank set pressure [2-1-403]	Y	
Part 4a	Tank pressures for tanks subject to Regulation 8, Rule 5 [Regulation 8, Rule 5]	Y	
Part 5	Pressure relief valve setting at or above nominal set pressure	Y	
Part 6	Corrective Plan	Y	
Part 7	Pressure monitoring records [2-1-403]	Y	
Part 8	Initial date for reporting pressures in excess of nominal set pressure (7/5/09)	Y	~~7/5/09~~
Part 9	Compliance with nuisance and odor regulations [1-301, 7-301, 7-302]	Y	
~~**BAAQMD Condition 23843**~~	~~**Applies to S506**~~		
~~Part 1~~	~~Vapor pressure < 1.5 psia~~	~~Y~~	~~Upon startup~~
~~Part 2~~	~~Requirement to dismantle S158~~	~~Y~~	~~Upon startup~~

VI. Permit Conditions

The Major Facility Review permit contains conditions that are derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). Permit conditions may also be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 et seq., an order of abatement pursuant to H&SC § 42450 et seq., or as an administrative revision initiated by District staff. After issuance of the Title V permit, permit conditions will be revised using the procedures in Regulation 2, Rule 6, Major Facility Review.

When necessary to meet Title V requirements, additional monitoring, recordkeeping, or reporting has been added to the permit.

Each permit condition is identified with a unique numerical identifier, up to five digits.

All changes to existing permit conditions that are proposed in this action are clearly shown in "strike-out/underline" format in the proposed permit. When the permit is issued, all 'strike-out" language will be deleted and all "underline" language will be retained, subject to consideration of comments received.

Changes to permit:
The changes to the permit condition will be presented in number order.

- BAAQMD Condition 12133 was modified to cover Alternate Operating Scenarios of storing either material subject to Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb or storing material exempt from Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb (TVP less than 0.5 psi). Part 4 of the condition was added.

Condition 12133
APPLICATION 12412; SAN FRANCISCO REFINERY; PLANT 16
AMENDED BY APPLICATION 22023 (SEPT. 2010)
CONDITIONS FOR S-448 (T-1007)

1. The following total throughput shall not be exceeded in any rolling continuous 12 month period:
a. 2,190 thousand barrels.
[Cumulative Increase]

2. S-448 shall operate with closed, gasketed covers on all tank openings except pressure relief valves and vacuum breaker valves. [BACT]

3. Monthly records of the throughput of each material processed at this tank shall be kept in a District-approved log for at least 5 years and shall be made available to the District upon request. [Cumulative Increase]

Alternate Operating Scenario

4. S-448 is under an Alternate Operating Scenario in accordance with BAAQMD Regulation 2-6-409.7 and 40 CFR 70 and either stores material subject to Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb or stores material exempt from Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb.
a. The owner/operator shall keep a record in a contemporaneous log of the stored material.
b. The owner/operator shall notify the District in accordance with section 40 CFR 60.113(a)(5) prior to storing materials in S-448 that are subject to Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb.
c. The owner/operator shall perform inspections required by Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb prior to storing materials in S-448 that are subject to those regulations. [40 CFR 70.6(a)(9), BAAQMD Regulation 2-6-409.7]

- BAAQMD Condition 20773 will now apply to S448 when storing material exempt from Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb. There is no change to the condition language.

CONDITION 20773, TANKS EXEMPT FROM REGULATION 8, RULE 5

This condition applies to tanks that are exempt from Regulation 8, Rule 5, Storage of Organic Liquids, due to the exemption in Regulation 8-5-117 for storage of organic liquids with a true vapor pressure of less than or equal to 25.8 mm Hg (0.5 psia).

1. Whenever the type of organic liquid in the tank is changed, the owner/operator shall verify that the true vapor pressure at the storage temperature is less than or equal to 25.8 mm Hg (0.5 psia). The owner/operator shall use Lab Method 28 from Volume III of the District's Manual of Procedures, Determination of the Vapor Pressure of Organic Liquids from Storage Tanks. For materials listed in Table 1 of Regulation 8, Rule 5, the owner/operator may use Table 1 to determine vapor pressure, rather than Lab Method 28. If the results are above 25.8 mm Hg (0.5 psia), the owner/operator shall report non-compliance in accordance with Standard Condition I.F and shall submit an application to the District for a new permit to operate for the tank as quickly as possible. [Basis: 8-5-117 and 2-6-409.2]

2. The results of the testing shall be maintained in a District-approved log for at least five years from the date of the record, and shall be made available to District staff upon request. [Basis: 2-6-409.2]

- Condition 23843 was deleted in Application NSR 22567/TV 22568

VII. Applicable Limits and Compliance Monitoring Requirements

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

In the case of a conflict between Section VII and the other sections of the permit, the other sections govern.

Changes to permit:

- Table VII-BB.9 was changed to Table VII-BB.9A to apply to S448 when storing materials subject to NSPS Kb and BAAQMD 8-5.
- Table VII-BB.9A Monitoring Requirement Citation was updated to include Condition 12133 and "prior to refilling tank with VOL" was added to Monitoring Frequency to clarify inspections are required prior to switching from materials exempt from NSPS Kb and BAAQMD 8-5 to materials subject to NSPS Kb and BAAQMD 8-5.
- Table VII-BB.9B was added to apply to S448 when storing materials exempt from NSPS Kb and BAAAMD 8-5.
- Table VII-BB.11 was updated by removing references to future effective dates that have passed and deleting Condition 23843, which was removed in Application NSR 22567.

Table VII – BB.9A
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Zero Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	S448 will be subject to the requirements of Table IV-BB.9A when storing materials subject to NSPS Kb and BAAQMD 8-5. S448 will be subject to the requirements of Table IV-BB.9B when storing materials exempt from NSPS Kb and BAAAMD 8-5.						
	BAAQMD Regulation 8, Rule 5, Organic Compounds - STORAGE OF ORGANIC LIQUIDS LIMITS AND MONITORING FOR INTERNAL FLOATING-ROOF TANKS						
VOC	BAAQMD 8-5-301	Y		Record of liquids stored and true vapor pressure	BAAQMD & SIP 8-5-501.1 & Condition 12133, Part 4a	periodic initially and upon change of service	Records
VOC	BAAQMD & SIP 8-5-320	Y		Floating roof fitting closure standards; includes gasketed covers	BAAQMD & SIP 8-5-402.3	P/SA	Measurement and visual inspection

Table VII – BB.9A
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Zero Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD & SIP 8-5-321	Y		Primary rim-seal standards; includes gap criteria	BAAQMD & SIP 8-5-402.1 & Condition 12133, Part 4c	periodic 10 year intervals and every time a seal is replaced & prior to refilling tank with VOL	Seal inspection
VOC	BAAQMD & SIP 8-5-322	Y		Secondary rim-seal standards; includes gap criteria	BAAQMD & SIP 8-5-402.1 & Condition 12133, Part 4c	periodic 10 year intervals and every time a seal is replaced & prior to refilling tank with VOL	Seal inspection
VOC	BAAQMD 8-5-305, 8-5-321.1, 8-5-322.1	Y		Visual inspection of outer most seal	BAAQMD & SIP 8-5-402.2	P/SA	Visual inspection
VOC	BAAQMD 8-5-320 8-5-321 8-5-321.1 8-5-322.1	N		Floating roof fittings, visual inspection of outer most seal	BAAQMD 8-5-402.2 8-5-402.3 8-5-411.3 (optional)	P/Q (optional)	Fitting inspection; Visual inspection
VOC	BAAQMD 8-5-328.1	N		Residual organic concentration of < 10,000 ppm as methane after degassing	BAAQMD 8-5-328.1	P/each time emptied & degassed; 4 consecutive measurements at 15 minute intervals	Method 21 portable hydrocarbon detector
VOC	SIP 8-5-328.1.2	Y		Concentration of < 10,000 ppm as methane after degassing	SIP 8-5-503	periodic each time emptied & degassed	Portable hydrocarbon detector

Table VII – BB.9A
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Zero Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC		Y		Records of tank seal replacement	BAAQMD 8-5-501.2	periodic after each tank seal replacement	Records
	40 CFR 60 Subpart Kb – NSPS for VOL Storage Vessels **40 CFR 63 Subpart CC – NESHAPS for Petroleum Refineries** **LIMITS AND MONITORING FOR INTERNAL FLOATING ROOF TANKS**						
VOC	40 CFR 63.640 (n)(1), 60.112b (a)(1)	Y		Deck fitting closure standards; includes gasketed covers	40 CFR 63.640(n)(8), 60.113b (a)(3) & (4)	periodic initially & each time emptied & degassed, at least every 10 yr	visual inspection
VOC	40 CFR 63.640 (n)(1), 60.113b (a)(1) & (4)	Y		Primary rim-seal standards; no holes or tears	40 CFR 63.640(n)(8), 60.113b (a)(3) & (4) & Condition 12133, Part 4c	periodic initially & each time emptied & degassed & prior to refilling tank with VOL, at least every 10 yr	visual inspection
VOC	40 CFR 63.640 (n)(1), 60.113b (a)(1) & (4)	Y		Secondary rim-seal standards; no holes or tears	40 CFR 63.640(n)(8), 60.113b (a)(3) & (4) & Condition 12133, Part 4c	periodic initially & each time emptied & degassed & prior to refilling tank with VOL, at least every 10 yr	visual inspection
VOC	40 CFR 63.640 (n)(1), 60.113b (a)(2)	Y		Internal visual inspection from viewports of fixed roof	40 CFR 63.640(n)(8), 60.113b (a)(2) & (3)	periodic initially & annually	visual inspection

Table VII – BB.9A
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Zero Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	40 CFR 63.640 (n)(1), 60.116b (c)	Y		Record of liquid stored and true vapor pressure	40 CFR 63.640(n)(8), 60.116b (c) & (e) & Condition 12133, Part 4a	periodic upon change of service	records
VOC		Y		Record of each initial, annual, and 10-year tank inspection	40 CFR 63.640(n)(8), 60.115b(a)(2)	periodic for each tank inspection	records
VOC		Y		Report of non-compliant annual inspection for tanks with secondary seals	40 CFR 63.640(n)(8), 60.115b(a)(4)	periodic within 30 days of tank inspection	report
	BAAQMD PERMIT CONDITIONS						
throughput	BAAQMD Condition 12133, Part 1	Y		2,190,000 bbl/yr	BAAQMD Condition 12133, Part 3	P/M	records

Table VII – BB.9B
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Zero-Gap Internal Floating Roof Tank
but with NSPS Kb and BAAQMD 8-5 Flexibility
S448 (Tank 1007)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	S448 will be subject to the requirements of Table IV-BB.9A when storing materials subject to NSPS Kb and BAAQMD 8-5. S448 will be subject to the requirements of Table IV-BB.9B when storing materials exempt from NSPS Kb and BAAAMD 8-5.						
	BAAQMD Regulation 8, Rule 5 - Organic Compounds - STORAGE OF ORGANIC LIQUIDS **Exempt per 8-5-117. Low vapor pressure**						
POC	BAAQMD 8-5-117 & Condition 20773, Part 1	Y		Exemption from Regulation 8-5 when true vapor pressure is less than 25.8 mm Hg (0.5 psia).	BAAQMD 2-6-409.2 & Condition 20773, Part 2 & Condition 12133, Part 4a	P/E	Vapor pressure determination upon material change & Records
	40 CFR 63, Subpart CC – National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries **RECORDKEEPING ONLY**						
HAP	40 CFR 63.641	Y		Retain weight percent total organic HAP in stored liquid for Group 2 determination.	40 CFR 63.655(i)(1)(iv)	periodic initially and upon change in service	Records
	BAAQMD Permit Conditions						
throughput	BAAQMD Condition 12133, Part 1	Y		2,190,000 bbl/yr	BAAQMD Condition 12133, Part 3	P/M	records

Table VII – BB.11
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Fixed Roof Tanks with Vapor Recovery to Fuel Gas
S135 (Tank 200), S360 (Tank 223), S445 (Tank 271), S449 (Tank 285), S506 (Tank 257)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
~~Tank S506 will be subject to the requirements in Table VII-BB.11 upon startup.~~							
	BAAQMD Regulation 8, Rule 5, Organic Compounds - STORAGE OF ORGANIC LIQUIDS **LIMITS AND MONITORING FOR CVS & CONTROL DEVICES**						

Table VII – BB.11
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Fixed Roof Tanks with Vapor Recovery to Fuel Gas
S135 (Tank 200), S360 (Tank 223), S445 (Tank 271), S449 (Tank 285), S506 (Tank 257)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-5-301	Y		Record of liquids stored and true vapor pressure	BAAQMD 8-5-501.1	periodic initially and upon change of service	records
VOC	BAAQMD 8-5-303.1	Y		Pressure vacuum valve set pressure within 10% of maximum allowable working pressure of the tank, or at least 0.5 psig	BAAQMD 8-5-403	P/SA	visual inspection
VOC	BAAQMD 8-5-303.2	Y		Pressure vacuum valve must be gas-tight: < 500 ppm (as methane) above background	BAAQMD 8-5-403 8-5-503 8-5-605	P/SA	Method 21 portable hydrocarbon detector
VOC	BAAQMD 8-5-306	Y		Control device standards; includes 95% efficiency requirement	BAAQMD 8-5-603.1	not specified	MOP Volume IV ST-4
VOC	BAAQMD 8-5-328.1.2	Y		Organic concentration in tank <10,000 ppm as methane after cleaning	BAAQMD 8-5-503	periodic each time emptied & degassed	portable hydrocarbon detector
VOC		Y		Determination of applicability	BAAQMD 8-5-604	P/E	look-up table or sample analysis
NONE	**40 CFR 63 Subpart CC – NESHAPS for Petroleum Refineries** **Exempt per 63.640(d)(5). Emission point routed to fuel gas system.**						
	40 CFR 60 Subpart Kb – NSPS for VOL Storage Vessels **LIMITS AND MONITORING FOR CVS & CONTROL DEVICES (NOT A FLARE)**						
VOC	40 CFR 60.112b (a)(3)(i)	Y		Closed vent system leak tightness standards (< 500 ppmw)	40 CFR 60.112b (a)(3)(i)	as required in 60.485(b) [Subpart VV]	Method 21
VOC	40 CFR 60.112b (a)(3)(ii)	Y		Control device standards; includes 95% efficiency requirement	40 CFR 60.113b (c)(2)	as approved	specified parameter
	BAAQMD PERMIT CONDITIONS						
The following applies to S135 only							
VOC	BAAQMD Condition 22518, Part 1	Y		Vapor pressure < 11 psia	BAAQMD 8-5-501.1	periodic initially and upon change of service	records

Table VII – BB.11
Applicable Limits and Compliance Monitoring Requirements
NSPS Kb Fixed Roof Tanks with Vapor Recovery to Fuel Gas
S135 (Tank 200), S360 (Tank 223), S445 (Tank 271), S449 (Tank 285), S506 (Tank 257)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	BAAQMD Condition 22518, Part 3	Y		10 E 6 bbl/yr	BAAQMD 8-5-501.1	P/E	Records
The following applies to S445 only.							
VOC	BAAQMD Condition 12130, Part 1	Y		Requirement to vent working emissions to fuel gas system	None	N	None
The following applies to S449 only.							
VOC	BAAQMD Condition 11219, Part 1	Y		Requirement to vent working emissions to fuel gas system	None	N	None
The following applies to S360 only.							
throughput	BAAQMD Condition 20989, Part A	Y		2.78 E 6 bbl/yr	BAAQMD Condition 20989, Part A	P/M	records
The following applies to S135, S360, S445, and S449.							
	Condition #23724, part 4a	Y	~~7/5/09~~	Applies to S135 TBD	Condition #23724, part 3	C	Pressure monitoring
	Condition #23724, part 4a	Y	~~7/5/09~~	Applies to S360 1.9 inches of water	Condition #23724, part 3	C	Pressure monitoring
	Condition #23724, part 4a	Y	~~7/5/09~~	Applies to S445 1.9 inches of water	Condition #23724, part 3	C	Pressure monitoring
	Condition #23724, part 4a	Y	~~7/5/09~~	Applies to S449 1.5 inches of water	Condition #23724, part 3	C	Pressure monitoring
The following applies to S506 only							
VOC	Condition #23724, part 4a	Y	~~Upon startup~~	Applies to S506 2.2 inches of water	Condition #23724, part 3	C	Pressure monitoring
	~~BAAQMD Condition 23843, Part 1~~	~~Y~~	~~Upon startup~~	~~Vapor pressure < 1.5 psia~~	~~BAAQMD 8-5-501.1~~	~~periodic initially and upon change of service~~	~~records~~

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section IV of the permit.

Changes to permit
There are no changes to Section VIII in this action.

IX. Permit Shield:

Changes to permit:
This action proposes no changes to permit shields.

X. Revision History

Changes to permit:

Minor Revision (Application 22024):	[enter approval date]
Minor Revision (Application 22568):	[enter approval date]

XI. Glossary

Changes to permit:
There are no changes to Section XI in this action.

D. Alternate Operating Scenarios:

Conoco has requested an alternate operating scenario for S448, Internal Floating Roof Tank, in this action.

S448 will store either materials exempt from or subject to Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb.

When S448 stores materials exempt from Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb, Conoco is exempt from requirements in Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb. Prior to refilling S448 with materials subject to Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb, Conoco must notify the District and conduct inspections required by these regulations. These requirements are included in proposed BAAQMD Condition 12133, parts 4b and 4c.

The Title V regulations in 40 CFR Part 70.6(a)(9) require that facility must keep a record in a contemporaneous log when the facility changes any aspect of its operations from one permitted scenario to another and that each alternate operating scenario must meet all applicable requirements. This requirement is included in proposed BAAQMD Condition 12133, part 4a.

Condition 12133, part 4, is proposed to implement the alternate operating scenario:
Alternate Operating Scenario
4. S-448 is under an Alternate Operating Scenario in accordance with BAAQMD Regulation 2-6-409.7 and 40 CFR 70 and either stores material subject to Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb or stores material exempt from Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb.
a. The owner/operator shall keep a record in a contemporaneous log of the stored material.
b. The owner/operator shall notify the District in accordance with section 40 CFR 60.113(a)(5) prior to storing materials in S-448 that are subject to Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb.
c. The owner/operator shall perform inspections required by Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb prior to storing materials in S-448 that are subject to those regulations. [40 CFR 70.6(a)(9), BAAQMD Regulation 2-6-409.7]

E. Compliance Status:

See Section C.V above.

APPENDIX A

GLOSSARY

ARB
Air Resources Board

BAAQMD
Bay Area Air Quality Management District

BACT
Best Available Control Technology

Basis
The underlying authority that allows the District to impose requirements.

CAA
The federal Clean Air Act

CAAQS
California Ambient Air Quality Standards

CEM
Continuous Emission Monitor

CEQA
California Environmental Quality Act

CFEP
Clean Fuel Expansion Project

CFR
The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO
Carbon Monoxide

Cumulative Increase
The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Cumulative increase is used to determine whether threshold-based requirements are triggered.

District
The Bay Area Air Quality Management District

dscf
Dry Standard Cubic Feet

EPA
The federal Environmental Protection Agency.

EFRT
External Floating Roof Tank

Federally Enforceable, FE
All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPAapproved program that has been incorporated into the SIP.

FP

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

MOP
The District's Manual of Procedures.

NAAQS
National Ambient Air Quality Standards

NESHAPS
National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Parts 61 and 63.

NH3
Ammonia

NOx
Oxides of nitrogen.

NSPS
Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR Part 60 and District Regulation 10.

NSR
New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement
A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NOx, PM10, and SO2.

POC
Precursor Organic Compounds

PM
Particulate Matter

PM10
Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD
Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SCR
Selective Catalytic Reduction

SIP
State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO2
Sulfur dioxide

Title V
Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

TRMP
Toxic Risk Management Plan

VOC
Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
cfm	=	cubic feet per minute
g	=	grams
gal	=	gallon
gpm	=	gallons per minute
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m^2	=	square meter
min	=	minute
mm	=	million
MMbtu	=	million btu
MMcf	=	million cubic feet
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

APPENDIX B

NSR Applications 22023 and 22567

ENGINEERING EVALUATION
ConocoPhillips, San Francisco Refinery
Application #22023- Plant #16

I. BACKGROUND

ConocoPhillips has applied for a change of conditions for the following equipment:

S-448 Internal Floating Roof Tank, 10,206K gallon capacity (Tank 1007)

S-448 is permitted to store various petroleum products subject to Regulation 8, Rule 5, 40 CFR 60 Subpart Kb, and 40 CFR 63 Subpart CC. The facility has applied for a change of conditions to exempt S-448 tank from Regulation 8-5 and NSPS Subpart Kb requirements while storing low vapor pressure (TVP less than 0.5 psi) materials, such as diesel. The facility requests to maintain the ability to return the tank to regulated service of storing higher vapor pressure materials for flexibility and will retain the current throughput limit in Condition # 12133. There will be no emissions increase since this will allow the facility to store lower vapor pressure materials and there is no increase in throughput.

The facility is required to conduct inspections required by Regulation 8, Rule 5, 40 CFR 60 Subpart Kb, and 40 CFR 63 Subpart CC prior to storing materials with vapor pressure greater than 0.5 psi after storing low vapor pressure materials. 40 CFR 60.113b(a)(5) requires the facility to notify the District 30 days prior to refilling the tank. A condition will be added to require inspections prescribed in Regulation 8-5 be conducted prior to returning the tank to regulated service and that the District be notified in accordance with 40 CFR 60.113b(a)(5).

II. EMISSION CALCULATIONS

There is no increase in emissions as a result of this application.

III. PLANT CUMULATIVE INCREASE SINCE 4/5/1991

There will be no increase in the Plant Cumulative Increase as a result of this application.

IV. OFFSETS

There is no increase in emissions so offsets are not required per Regulation 2-2-302.

V. TOXIC SCREENING ANALYSIS

A Toxic Risk Screening Analysis is not required for this project because there is no increase in emissions.

VI. BEST AVAILABLE CONTROL TECHNOLOGY

BACT does not apply per Regulation 2-1-301 because there is no increase in emissions.

VIII. STATEMENT OF COMPLIANCE

While storing low vapor pressure materials, S-448 is exempt from Regulation 8-5 per 8-5-117 when storing low vapor pressure materials:
8-5-117 Limited Exemption, Low Vapor Pressure: The provisions of this rule, except for Section 8-5-307.3, shall not apply to tanks storing organic liquids with a true vapor pressure of less than or equal to 25.8 mm Hg (0.5 psia) as determined by Sections 8-5-602 or 604.
(Adopted 1/20/93; Amended 11/27/02; 10/18/06)

The owner/operator shall continue to comply with all other requirements in Regulation 8-5, 40 CFR 60 Subpart Kb, and 40 CFR 63 Subpart CC as listed in the Title V tables below.

The project is considered to be ministerial under the District's CEQA regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emissions factors and therefore is not discretionary as defined by CEQA. (Permit Handbook Chapter 4)

This facility is subject to Regulation 2, Rule 6 and requires a minor revision to the Title V permit in accordance with section 2-6-404.4 and submitted Application 22024 for this purpose. The changes proposed in this application are not significant as defined by section 2-6-226 since the changes are not considered a major modification under 40 CFR Parts 51 or 52 (PSD) nor a modification under 40 CFR Parts 60 (NSPS), 63 (NESHAPs), and the change will not result in any emissions increase. The change will not be a significant change or relaxation of monitoring, reporting, or recordkeeping nor will it allow the facility to avoid an applicable requirement since the new parts of BAAQMD condition 12133 will require recordkeeping and monitoring. The change is not a case-by-case determination of any emission limit or standard or facility-specific determination or incorporation of any requirement promulgated by EPA. In accordance with section 2-6-215, this change is a minor permit revision.

This project is not located within 1,000 ft from the nearest public school and is therefore not subject to the public notification requirements of Regulation 2-1-412.

IX. CONDITIONS

Condition 12133
APPLICATION 12412; SAN FRANCISCO REFINERY; PLANT 16
AMENDED BY APPLICATION 22023 (SEPT. 2010)
CONDITIONS FOR S-448 (T-1007)

1. The following total throughput shall not be exceeded in any rolling continuous 12 month period:
a. 2,190 thousand barrels.
[Cumulative Increase]

2. S-448 shall operate with closed, gasketed covers on all tank openings except pressure relief valves and vacuum breaker valves.
[BACT]

3. Monthly records of the throughput of each material processed at this tank shall be kept in a District-approved log for at least 5 years and shall be made available to the District upon request.
[Cumulative Increase]

Alternate Operating Scenario

4. S-448 is under an Alternate Operating Scenario in accordance with BAAQMD Regulation 2-6-409.7 and 40 CFR 70 and either stores material subject to Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb or stores material exempt from Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb.
   a. The owner/operator shall keep a record in a contemporaneous log of the stored material.
   b. The owner/operator shall notify the District in accordance with section 40 CFR 60.113(a)(5) prior to storing materials in S-448 that are subject to Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb.
   c. The owner/operator shall perform inspections required by Regulation 8, Rule 5 and 40 CFR Part 60 Subpart Kb prior to storing materials in S-448 that are subject to those regulations.

[40 CFR 70.6(a)(9), BAAQMD Regulation 2-6-409.7]

Add Condition #20773 to S-448

CONDITION 20773, TANKS EXEMPT FROM REGULATION 8, RULE 5

This condition applies to tanks that are exempt from Regulation 8, Rule 5, Storage of Organic Liquids, due to the exemption in Regulation 8-5-117 for storage of organic liquids with a true vapor pressure of less than or equal to 25.8 mm Hg (0.5 psia).

1. Whenever the type of organic liquid in the tank is changed, the owner/operator shall verify that the true vapor pressure at the storage temperature is less than or equal to 25.8 mm Hg (0.5 psia). The owner/operator shall use Lab Method 28 from Volume III of the District's Manual of Procedures, Determination of the Vapor Pressure of Organic Liquids from Storage Tanks. For materials listed in Table 1 of Regulation 8, Rule 5, the owner/operator may use Table 1 to determine vapor pressure, rather than Lab Method 28. If the results are above 25.8 mm Hg (0.5 psia), the owner/operator shall report non-compliance in accordance with Standard Condition I.F and shall submit an application to the District for a new permit to operate for the tank as quickly as possible. [Basis: 8-5-117 and 2-6-409.2]

2. The results of the testing shall be maintained in a District-approved log for at least five years from the date of the record, and shall be made available to District staff upon request. [Basis: 2-6-409.2]

X. RECOMMENDATION

Issue a Change of Conditions for the following equipment:

S-448 Internal Floating Roof Tank, 10,206K gallon capacity (Tank 1007)

Modify the Title V permit with the following changes (TV Application # 22024)

Kathleen Truesdell
Air Quality Engineer II

ENGINEERING EVALUATION
ConocoPhillips, San Francisco Refinery
Application #22567- Plant #16

I. BACKGROUND

ConocoPhillips has applied for a change of conditions for the following equipment:

S506 Tank #257, Fixed Roof, 80K barrels abated by A7 Vapor Recovery System

The facility has requested Condition 23843 be removed from the permit. Condition 23843 applies only to source S506 and has two parts:

1. The owner/operator shall ensure that S506 stores only petroleum products with a true vapor pressure less than or equal to 1.5 psia. [Basis: Cumulative Increase]

2. The owner/operator shall ensure that S158 (Tank #258) is taken out of service and dismantled once S506 becomes operational. [Basis: Regulation 2-1-403]

The condition was imposed in NSR Application 16940 when S506 (Tank 257) was permitted. Part 1 limiting TVP of the stored materials was imposed based on the average TVP of the material expected to be stored (heavy unicrackate). The facility would like to have the flexibility to store other materials, which may have higher vapor pressures. S506 has a natural gas blanket, pressure monitoring system, and is abated by A7 Vapor Recovery System. Gases are routed via the vapor recovery system to the fuel gas system where the gases are compressed and desulfurized prior to combustion as needed in heaters. Pressure in the tank will not increase per the letter from Brent Eastep dated September 28, 2010 since there is a pressure control system that maintains pressure in the tanks abated by A7 to around 0.2 inches of water by adjusting the flowrate of natural gas into the tank and the flowrate of gases from the tank to the vapor recovery system. Emissions will not increase since A7 is part of the fuel gas system.

Condition 23843 Part 2 is no longer needed since S158 (Tank 258) has been demolished per the cover letter for this application from Kevin Schmitt dated September 13, 2010.

S506 is also subject to Condition 23724.

II. EMISSION CALCULATIONS

There is no increase in emissions as a result of this application.

III. PLANT CUMULATIVE INCREASE SINCE 4/5/1991

There will be no increase in the Plant Cumulative Increase as a result of this application.

IV. OFFSETS

There is no increase in emissions so offsets are not required per Regulation 2-2-302.

V. TOXIC SCREENING ANALYSIS

A Toxic Risk Screening Analysis is not required for this project because there is no increase in emissions.

VI. BEST AVAILABLE CONTROL TECHNOLOGY

BACT does not apply per Regulation 2-1-301 because there is no increase in emissions.

VIII. STATEMENT OF COMPLIANCE

The owner/operator shall continue to comply with requirements in Regulation 8-5, 40 CFR 60 Subpart Kb, and 40 CFR 63 Subpart CC as listed in the Title V tables below.

The project is considered to be ministerial under the District's CEQA regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emissions factors and therefore is not discretionary as defined by CEQA. (Permit Handbook Chapter 4)

This facility is subject to Regulation 2, Rule 6 and requires a minor revision to the Title V permit in accordance with section 2-6-404.4 and submitted Application 22568 for this purpose. The changes proposed in this application are not significant as defined by section 2-6-226 since the changes are not considered a major modification under 40 CFR Parts 51 or 52 (PSD) nor a modification under 40 CFR Parts 60 (NSPS), 63 (NESHAPs), and the change will not result in any emissions increase. The change will not be a significant change or relaxation of monitoring, reporting, or recordkeeping nor will it allow the facility to avoid an applicable requirement. The change is not a case-by-case determination of any emission limit or standard or facility-specific determination or incorporation of any requirement promulgated by EPA. In accordance with section 2-6-215, this change is a minor permit revision.

This project is not located within 1,000 ft from the nearest public school and is therefore not subject to the public notification requirements of Regulation 2-1-412.

CONDITIONS

Condition 23724

For Sources S135 (Tank 200), S137 (Tank 202), S139 (Tank 204), S140 (Tank 205), S168 (Tank 269), S173 (Tank 280), S174 (Tank 281), S175 (Tank 284), S182 (Tank 294), S360 (Tank 223), S445 (Tank 271), S449 (Tank 285), S506 (Tank 257), Tank 235, and Tank 236.

This condition was imposed by Application 13424 and amended by Application 16940 in January 2008, Application 13427 in 2009, and Application 21706 in 2010.

1a. The owner/operator shall ensure that all sources subject to this permit condition are abated by A7, Vapor Recovery System at all times of operation except for the following sources, which shall be controlled according to the schedule below:

1. S168
2. S173
3. S174
4. S506

S168 shall be abated by A7 and subject to the terms of this condition prior to the startup of S434. S173 and S174 shall be abated when blanketing is required to preserve product or feed.

S506 shall be abated by A7 and subject to the terms of this condition upon the date of startup. [Basis: Regulation 2-1-403]

1b. The owner/operator shall ensure that a fourth compressor is added to A7, Odor Abatement System, before more than two of the following sources are controlled by A7: S168, S173, S174, S175, S506. [Basis: Regulation 2-1-301, 2-1- 305, 2-1-403, CEQA]

1c. The new odor abatement compressor, or a dedicated compressor, shall be designed and installed to supplement G-503, Flare Gas Recovery Compressor. [CEQA]

2.The owner/operator shall ensure that all tanks subject to this permit condition are blanketed by utility-grade natural gas. [Basis: Regulation 2-1-403]

3.By July 5, 2009, the owner/operator shall equip all tanks subject to this permit condition except S506 with District-approved pressure monitoring devices. Upon startup, the owner/operator shall equip S506 with a District- approved pressure-monitoring device. [Basis: Regulation 2-1-403]

4.After the pressure monitoring devices are installed, the owner/operator shall ensure that tanks listed below operate at all times below their respective minimum set pressures, as shown in 4a and 4b of this condition. Any recorded pressure in excess of the minimum pressure shall be reported to the District's Enforcement and Engineering Divisions within 10 days of the pressure excess. The owner/operator must conduct an investigation of the incident to determine if the pressure excess resulted in the pressure/vacuum (PV) valve lifting to atmosphere and if so, why there was a pressure excess that resulted in the PV valve lifting to atmosphere. Results of the investigation must be reported to the District's Enforcement and Engineering Division within 30 days of the initial report. Any recorded pressure in excess of the minimum set pressure shall be considered an indication of a valve lift to atmosphere unless a District approved tell-tale indicator on the PV valve shows that the valve did not lift, or the owner/operator demonstrates to the satisfaction of the APCO that the recorded pressure excess was the result of a monitoring, recording or other malfunction.

The minimum set pressure for each storage tank, except S139, S140, S182, S360, S445, S449, must be submitted in a report to the District's Enforcement and Engineering Divisions within 21 months of issuance of the Authority to Construct.

a. Source Number — Minimum Set Pressure (inches H2O)

Source Number	Minimum Set Pressure (inches H2O)
135	1.7
137	0.8
139	1.9
140	1.9
168	1.8
182	1.5
360	1.9
445	1.9
449	1.5
506	2.2

The owner/operator shall submit an accelerated permit application to include any change to any of the pressures above. Any amendment to the Title V permit to include the pressures above shall be submitted as a minor revision to the Title V permit. [Basis: Regulation 8, Rule 5]

b. Source Number — Minimum Set Pressure (inches H2O)

173	1.8
174	1.8
175	1.3
Tank 235	2.2
Tank 236	0.9

The owner/operator shall submit an accelerated permit application to include any change to any of the pressures above. Any amendment to the Title V permit to include the pressures above shall be submitted as a minor revision to the Title V permit. [Basis: Regulation 2-1-403]

5. The owner/operator shall ensure that each pressure relief valve for each tank must be set at or above its nominal set pressure listed in Part 4 of this permit condition. [Basis: Regulation 2-1-403]

6. Corrective Plan

The corrective plan is a means for ConocoPhillips to correct occasional exceedances, to stay within the working pressure limits and thus to remain in compliance with District Regulations. If a PV valve has been determined to have lifted three times in a 12 month period, ConocoPhillips shall implement abatement measures to prevent the recurrence of the type of incident which caused the valve to lift. This plan is intended to provide a mechanism for bringing ConocoPhillips back into compliance should a Temporary exceedance occur. This plan does not constitute an alternative means of compliance. [Basis: Regulation 2-1-403]

a. If, during any consecutive 12-month period, more than three instances of a PV valve release to atmosphere attributed to a storage tank subject to this permit condition are reported, ConocoPhillips shall propose a method to correct the exceedance and to ensure compliance with District regulations and permit conditions. The proposed method is subject to approval by the Air Pollution Control Officer. Potential methods include but are not limited to increasing the nominal set pressure of the pressure/vacuum valve, bladder tank(s) for additional short-term vapor storage capacity, dedicated vapor recovery flare, pilot control on pressure relief valves, flow meters on vapor recovery tanks to monitor blanket gas flows, replacement of tanks, and naphtha degassers. [Basis: Regulation 2-1-403]

7. To determine compliance with the above conditions, the owner/operator shall maintain the following records and provide all of the data necessary to evaluate compliance with the above parts, including, but not necessarily limited to the following information:

a. Pressure measurements from tanks listed in part 4 of this condition. Pressure shall be recorded at least for one-minute interval for each tank, except as allowed in BAAQMD Regulation 1-523 for parametric monitors. The owner/operator shall maintain a reasonable stock of spare parts for the components of the monitoring system to ensure that repairs are completed as quickly as possible.

All records shall be retained on site for five years, from the date of entry and made available for inspection by the District staff upon request. These recordkeeping requirements shall not replace the recordkeeping requirements contained in any applicable District regulation. [Basis: Regulation 2-1-403]

8. The requirement to report pressures in excess of the minimum pressure as described in part 4 of this permit condition, shall start on July 5, 2009 for all tanks in this condition except S139, S140, S182, S360, S445, S449. The requirement to report pressures in excess of the minimum pressure as described in part 4 of this permit condition, shall start on January 5, 2008 for the following tanks: S139, S140, S182, S360, S445, S449. [Basis: 2-1- 403]

9. The permit to operate is contingent upon compliance with Regulation 1-301, Standard for Public Nuisance, and Regulation 7, Odorous Substances. Upon receipt of a violation for either of these

regulations, the Air Pollution Control Officer may require the owner/operator to install additional emission control measures as stated in Part 6 of this permit condition. [Basis: Regulations 1-301, 7-301, 7-302]

~~COND# 23843~~

~~Permit Condition for S506 (Tank #257)~~

~~1. The owner/operator shall ensure that S506 stores only petroleum products with a true vapor pressure less than or equal to 1.5 psia. [Basis: Cumulative Increase]~~

~~2. The owner/operator shall ensure that S158 (Tank #258) is taken out of service and dismantled once S506 becomes operational. [Basis: Regulation 2-1-403]~~

X. RECOMMENDATION

Issue a Change of Conditions for the following equipment:

S506 Tank #257, Fixed Roof, 80K barrels abated by A7 Vapor Recovery System

Modify the Title V permit with the following changes (TV Application # 22568)

Kathleen Truesdell
Air Quality Engineer II