

**STATEMENT OF BASIS
Title V Permit Renewal**

Facility Name: SFPP, LP

Title V App. Number: APCD2021-APP-006689

Title V Permit Number: APCD2011-TVP-00031

Facility ID: APCD1979-SITE-00623

Equipment Address: 9950 San Diego Mission Road
San Diego, CA 92108

Facility Contact: Duncan Sinclair or Pete Almaraz or John Pannel
Facility Contact: Frank Luera
Contact Phone: 619-281-4052
TIV Responsible Party: Philip Vasquez
Contact Phone: 909-873-5123

Application Contact: Corbin Hennick
Title: Specialist – Permitting Compliance SR I
Contact Phone: (D) 713-420-6785, (C)281-827-7830
Email: corbin_hennick@kindermorgan.com

Application Contact: Nathaniel Grace
Title: Sr. EHS Compliance & Permitting Specialist
Contact Phone: (713) 420-2350
Email: Nathaniel_GraceJR@kindermorgan.com

Application Contact: Nina R. McAfee, CSP, REM
Title: EHS Manager Environmental Compliance
Products Pipelines
Contact Phone: (714) 560-4886 / 713-420-5610
Email: nina_mcafee@kindermorgan.com

Permit Engineer: Karen Yimnei Chan

Date: 04/16/2026

Senior Engineer Approval:

 Recoverable Signature

X Nicholas Horres

Nicholas Horres
Senior Engineer

Signed by: e933f2c8-9225-4b84-9a71-81071ff0330b

Contents

1.0 Type of Action and Summary of Changes..... 3

2.0 History of Title V Applications and Modifications/Applications since previous Renewal..... 3

3.0 Facility Description..... 7

4.0 Compliance History 9

5.0 Title V Applicability & Acid Rain..... 10

6.0 Potential to Emit and Actual Emissions..... 11

7.0 CFR Part 64 CAM (Compliance Assurance Monitoring)..... 11

8.0 Applicable Requirements..... 12

9.0 Updates to the Title V Permit Incorporated into this Action 21

10.0 Multiple Applicable Requirements Streamlining 25

11.0 Permit Process-Public Notification and Notice to EPA and Affected States 25

12.0 Recommendations..... 27

13.0 Attachments 27

1.0 Type of Action and Summary of Changes

This statement of basis reviews the application for a renewal of a Title V permit to operate for the SFPP, LP. The facility is subject to Title V of the Federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulation (CFR) and San Diego Regulation XIV permitting, because it is a major source of VOC emissions and NO_x emissions as defined by Rule 1401.

As part of the Title V renewal process, the District has also made a preliminary decision to take the following actions, which are further discussed below:

- Incorporate several recently approved District permits for new emission units into the Title V permit with changes necessary to address Title V requirements (applied for as a minor modification)
- Incorporate several recently approved District permits for modified existing emission units into the Title V permit with changes as necessary to address Title V requirements (applied for as a minor modification)
- Add new applicable requirements to permits where necessary,
- At the applicant's request, revise the permit conditions for several loading rack permits to align the leak detection requirements under their District permits.
- Process multiple operational flexibility applications according to Rule 1410 (l), 502(b)(10), modifications related to replacements of storage tank rim seals.
- Remove retired permits from the Title V permit, and
- Enhance monitoring, reporting, and recordkeeping requirements, clarify permit conditions and their basis, correct and update emission unit descriptions and correct typographical errors.

2.0 History of Title V Applications and Modifications/Applications since previous Renewal

This facility was first issued a Title V permit for VOC emissions in 2010. This application is for its second renewal since it was originally issued. Additionally, the EPA reclassified the District for ozone attainment from serious to severe, which decreased the Title V thresholds for NO_x and VOC thereby making this facility a federal major source of NO_x as well.

The District received the application for permit renewal on March 24, 2021, which is compliant with the requirement for a timely application submittal, at least 12 months but not more than 18 months, before the expiration of the existing Title V permit (APCD2011-TVP-00031) on June 26, 2022. The application was deemed complete on December 22, 2021; hence, an application shield pursuant to Rule 1410(a) is in effect for the facility until the District takes action on the renewal application.

The following Table 1 summarizes all previous applications at this facility affecting the Title V permit, APCD2011-TVP-00031, prior to this renewal.

Table 1 Summary of all previous applications at this facility affecting the Title V permit from initial Title V application up to the current Title V renewal.

Title V Application History Since Initial Title V Permit			
Application Number	Application Description	Equipment	Outcome
APCD2010-APP-001313	Initial TVP application	NA	Approved
APCD2012-APP-002345	Admin Amendment – responsible official change	NA	Approved
APCD2014-APP-003406	502(b)(10) – revise equipment commodity description and rim seal replacement	Storage Tank	Approved
APCD2014-APP-003524	502(b)(10) – rim seal replacement and equipment commodity description revision	Storage Tank	Approved
APCD2014-APP-003547	Minor Modification –revise equipment description and make physical changes to vapor bladder holder	Vapor Combustion Unit	Approved
APCD2015-APP-004151	502(b)(10) – rim seal replacement	Storage Tank	Approved
APCD2015-APP-004291	Renewal Application	NA	Approved
APCD2016-APP-004421	Admin Amendment – permit description correction	Storage Tank	Cancelled
APCD2016-APP-004669	502(b)(10) – rim seal replacement	Storage Tank	Approved
APCD2017-APP-004814	502(b)(10) – rim seal replacement	Storage Tank	Approved
APCD2017-APP-004935	502(b)(10) – rim seal replacement	Storage Tank	Approved
APCD2018-APP-005423	502(b)(10) – rim seal replacement	Storage Tank	Approved
APCD2018-APP-005535	502(b)(10) – rim seal replacement	Storage Tank	Approved
APCD2019-APP-005961	Admin Amendment – responsible official change and removing retired permit from TVP	NA	Approved
APCD2020-APP-006474	502(b)(10) – rim seal replacement	Storage Tank	Approved
APCD2020-APP-006542	502(b)(10) – rim seal replacement	Storage Tank	Included in this action

APCD2021-APP-006689	Renewal Application	NA	Current TV renewal application
APCD2021-APP-006741	502(b)(10) Rim Seal Replacement	Storage Tank	Included in this action
APCD2021-APP-006742	502(b)(10) Rim Seal Replacement	Storage Tank	Included in this action
APCD2022-APP-007237	502(b)(10) Rim Seal Replacement	Storage Tank	Included in this action
APCD2023-APP-007650	502(b)(10) Rim Seal Replacement	Storage Tank	Included in this action
APCD2023-APP-007786	502(b)(10) Rim Seal Replacement	Storage Tank	Included in this action
APCD2023-APP-007787	502(b)(10) Rim Seal Replacement	Storage Tank	Included in this action
APCD2023-APP-007880	502(b)(10) Rim Seal Replacement	Storage Tank	Open
APCD2025-APP-008825	502(b)(10) (Rim Seal Replacement)	Storage Tank	Open
APCD2026-APP-009072	502(b)(10) (Rim Seal Replacement)	Storage Tank	Open
APCD2026-APP-009088	502(b)(10) (Rim Seal Replacement)	Storage Tank	Open

Since the previous renewal, the District has received applications from this facility as shown in the following Table 2. These applications were submitted under the District’s local permitting program and typically associated with a corresponding Title V application to implement the same change to the Title V permit once the modified local permit is issued (see appendix A of the permit).

Table 2 Permit applications since the latest renewal.

Application Number	Affected Permit to Operate(s)	Description/Emission Unit	Related TV Application Number	Outcome
APCD2016-APP-004671	APCD2004-PTO-030271	Modification – rim seal replacement	APCD2016-APP-004669	Approved
APCD2017-APP-004813	APCD2004-PTO-004509	Modification – rim seal replacement	APCD2017-APP-004814	Approved
APCD2017-APP-004936	APCD2007-PTO-002775	Modification – rim seal replacement	APCD2017-APP-004935	Approved
APCD2018-APP-005424	APCD2004-PTO-002773	Modification – rim seal replacement	APCD2018-APP-005423	Approved
APCD2018-APP-005534	APCD2006-PTO-002776	Modification – rim seal replacement	APCD2018-APP-005535	Approved
APCD2019-APP-005943	APCD2006-PTO-002777	Modification – rim seal replacement	NA	Approved

APCD2019-APP-005957	APCD2006-PTO-002783	Modification – rim seal replacement	NA	Approved
APCD2020-APP-006541	APCD2006-PTO-008103	Modification – rim seal replacement	APCD2020-APP-006542	Approved
APCD2021-APP-006743	APCD2006-PTO-002772	Modification – rim seal replacement	APCD2021-APP-006741	Approved
APCD2021-APP-006744	APCD2006-PTO-976948	Modification – rim seal replacement	APCD2021-APP-006742	Approved
APCD2022-APP-007238	APCD2006-PTO-002781	Modification – rim seal replacement	APCD2022-APP-007237	Approved
APCD2023-APP-007651	APCD2007-PTO-004074	Modification – rim seal replacement	APCD2023-APP-007650	Approved
APCD2023-APP-007788	APCD2006-PTO-002782	Modification – rim seal replacement	APCD2023-APP-007786	Approved
APCD2023-APP-007789	APCD2007-PTO-002775	Modification – rim seal replacement	APCD2023-APP-007787	Approved
APCD2023-APP-007881	APCD2007-PTO-005504	Modification – rim seal replacement	APCD2023-APP-007880	Open
APCD2024-APP-008120	APCD2004-PTO-005135, APCD2004-PTO-005136, APCD2004-PTO-005137, APCD2003-PTO-005138, APCD2009-PTO-870364, APCD2006-PTO-005139, APCD2006-PTO-005140	Modification – Change of permit conditions for loading racks	NA	Approved
APCD2024-APP-008411	APCD2004-PTO-005135	Modification – add non-gasoline loading arm	NA	Approved
APCD2025-APP-008546	APCD2011-PTO-000883	New permit for a OWS Water treatment system	APCD2025-APP-008825	Open
APCD2025-APP-008826	APCD2006-PTO-002783	Modification – rim seal replacement	NA	Open
APCD2026-APP-009050	APCD2007-PTO-002779	Modification – rim seal replacement	NA	Open
Additionally, the following permits/emission units have been retired/ceased operation since the previous Title V permit was issued and will no longer be contained in Appendix A of the permit.				
NA	APCD2006-PTO-008103	Engine permit removal	APCD2019-APP-005961	NA
NA	APCD2008-PTO-974060	Soil vapor extraction and treatment equipment permit removal	NA	NA

3.0 Facility Description

SFPP is a bulk terminal used for petroleum products storage and distributes products in large volumes into mobile transport tanks for delivery to other facilities. SFPP stationary source consists of liquid storage tanks, transfer equipment, and vapor capture and control equipment. Emissions of the volatile organic compounds (VOC) are released from venting due to both normal breathing losses and working losses, the latter of which occur when transfers are being performed.

The facility currently holds 43 active PTO permits issued by the SDAPCD, as shown in the Permit/ Description

Table 3 and Appendix A. Generally, the permits at this facility fit into the following categories:

1. Underground storage tank for wastewater, oil and water separator
2. Emergency overflow tank
3. Ethanol unloading station
4. Loading rack
5. Storage tank
6. Vapor combustion unit for emissions control.

Table 3 Active PTOs held by the facility and their permit descriptions.

Permit Number	Equipment Description
APCD2011-PTO-000884	One 10,000 gallon underground storage tank for wastewater from rain runoff and loading rack wash down, not for storage of VOC, except for catastrophic spill of gasoline or ethanol
APCD2011-PTO-000883	One 4000 gallon oil/water separator tank & one 4000 gallon emergency overflow tank
APCD2011-PTO-000752	Ethanol unloading station – Rack #6
APCD2011-PTO-000753	Ethanol unloading station – Rack #7
APCD2012-PTO-001130	Ethanol unloading station – Rack #9
APCD2011-PTO-000751	Off specification (off-spec) unloading station
APCD2004-PTO-005135	Loading Rack #1; 16 bottom loading arms; 4 premium unleaded, 4 regular unleaded, 2 blended unleaded, 1 transmix and 5 non-gasoline products; shares vapor processor of permit # 860515
APCD2004-PTO-005136	Loading Rack #2; 12 bottom loading heads: 2 premium, 4 midgrade & 6 unleaded shares vapor processor of permit #860515.
APCD2004-PTO-005137	Loading Rack #3; 8 bottom load arms; 4 premium, 4 unleaded, rack #3 shares vapor processor-permit #860515
APCD2003-PTO-005138	LoadingRack#4; 8 bottom load arms: 4 premium/regular, 4 no-lead, no non-gasoline product; shares vapor processor of permit #860515
APCD2009-PTO-870364	Loading Rack #4 – 4 loading heads at Rack #4; shares vapor control connector with loading arms of PTO-005138 and vapor processor-permit#860515

APCD2006-PTO-005139	Loading Rack #5; 8 loading arms, which can dispense gasoline and/or ethanol and 4 loading arms for diesel; shares vapor processor of permit #860515
APCD2006-PTO-005140	Loading Rack #8; 4 vapor control connectors, 12 loading arms for gasoline and 4 loading arms for diesel; shares vapor processor of permit #860515
APCD2005-PTO-860515	John Zink Vapor Combustion Unit; shares by 7 loading racks
APCD2011-PTO-000885	4000-gallon Transmix storage tank, shares vapor processor of permit #860515
APCD2006-PTO-002772	Tank MV-01; an external pan floating roof equipped with double seals; a primary mechanical shoe seal and rim mounted rubber wiper with compression springs secondary seal and new support structure gasketing
APCD2004-PTO-002773	Tank MV-02; external floating roof; roof rim seals, primary - mech. Shoe seal
APCD2007-PTO-002779	Tank MV-03; gasoline, 86.5 feet in diameter and 48 feet high, 2,100,000 gallons internal floating roof with double seals; mechanical shoe primary seal and a rim mounted spring loaded wiper secondary seal, manufactured by matrix
APCD2007-PTO-005504	Tank MV-04; internal floating roof pan with primary and secondary rim seals: primary rim seals: metallic shoe; secondary rim seals: rim mounted rubber wiper seals
APCD2006-PTO-002777	Tank MV-05; external floating roof with double rim seal: primary-vapor mounted shoe secondary-rim mounted wiper
APCD2007-PTO-002778	Tank MV-06; external floating roof with double seals; mechanical shoe primary seal and rim mounted spring loaded wiper secondary seal, manufactured by matrix
APCD2008-PTO-002774	Tank MV-07; external floating roof with mechanical shoe as the primary seal & a steel compression plate with a rubber wiper as the secondary seal.
APCD2008-PTO-002784	Tank MV-08; an external floating roof equipped with double seals; a mechanical shoe primary seal and a rim mounted spring loaded secondary wiper seal, manufactured by matrix service, inc.
APCD2006-PTO-030271	Tank MV-09; an internal pan floating roof equipped with double seals; a mechanical shoe primary seal and a compression plate with wiper secondary seal, manufactured by Matrix Service, Inc.
APCD2006-PTO-890939	Tank MV-10; an internal pan floating roof equipped with double seals; a mechanical shoe primary seal and a compression plate with wiper secondary seal
APCD2007-PTO-002775	Tank MV-12; external floating roof with spring type mechanical primary shoe seal and a rubber wiper equipped with steel compression plates as the secondary seal
APCD2006-PTO-002776	Tank MV-13; external floating roof with vapor mounted shoe primary seal and rubber wiper spring type secondary seal
APCD2006-PTO-002783	Tank MV-14; an internal pan floating roof equipped with double seals, a mechanical shoe primary seal and a compression plate with wiper secondary seal, manufactured by Matrix Service, Inc

APCD2004-PTO-002780	Tank MV-15; internal floating cover. Primary seal: spring type. Secondary seal: rubber wiper
APCD2006-PTO-002781	Tank MV-16; internal floating roof with double seals; mechanical shoe primary seal and a compression plate with wiper secondary seal, manufactured by Matrix
APCD2006-PTO-002782	Tank MV-18; an external pontoon floating roof equipped with double seals; a mechanical shoe primary seal and a compression plate with wiper secondary seal, manufactured by Matrix Service, inc.
APCD2006-PTO-972647	Tank MV-19; internal floating roof equipped with a steel floating pan with a primary metal shoe seal and a rim mounted secondary seal with steel compression plates tipped with rubber wipers
APCD2006-PTO-976948	Tank MV-21; internal floating roof pan with primary and secondary rim seals: primary rim seals: metallic shoe; secondary rim seals: rim mounted rubber wiper seals.
APCD2006-PTO-002785	Tank MV-22; internal floating pan. Metallic shoe seal-primary seal. Steel backed rubber wiper type secondary.
APCD2006-PTO-008103	Tank MV-23; internal floating roof pan with primary and secondary rim seals: primary rim seals: metallic shoe; secondary rim seals: rim mounted rubber wiper seals; gasket seals
APCD2007-PTO-977156	Tank MV-25; internal floating roof pan with primary and secondary rim seals: primary rim seals: metallic shoe; secondary rim seals: rim mounted rubber wiper seals
APCD2007-PTO-004076	Tank MV-26; internal floating roof; internal floating roof pan with primary and secondary rim seals: primary rim seals: metallic shoe; secondary rim seals: rim mounted rubber wiper seals
APCD2007-PTO-004075	Tank MV-27; internal floating roof pan with primary and secondary rim seals: primary rim seals: metallic shoe; secondary rim seals: rim mounted rubber wiper seals
APCD2007-PTO-004074	Tank MV-28; internal floating roof pan with primary and secondary rim seals: primary rim seals: metallic shoe; secondary rim seals: rim mounted rubber wiper seals
APCD2009-PTO-004851	Tank MV-29; tank internal floating cover/cone-roof
APCD2007-PTO-977195	Tank MV-30; internal floating roof pan primary rim seals: metallic shoe; secondary rim seals: rim mounted rubber wiper seals
APCD2008-PTO-004508	Tank MV-31; internal floating roof equipped with double seals; a mechanical shoe primary seal and a rim mounted spring loaded secondary wiper seal, manufactured by matrix service, inc.
APCD2004-PTO-004509	Tank MV-32; internal floating roof. Shoe seal and rim seal

4.0 Compliance History

Since the most recent Title V application, the facility has demonstrated continuous compliance with applicable requirements. However, the facility has been subject to compliance actions on 20 occasions. All violations have been addressed to resolve minor fugitive vapor leaks during loading operations at loading racks, record keeping, monitoring, inspection scheduling

inconsistencies, failure to submit document including inspection notices in a timely manner, and open VOC containers.

Considering the number of permits, length of time and complexity of the facility, the facility has been able to maintain a high compliance rate and all the violations have been resolved. The facility is currently in active compliance with all the permit conditions and there is no current non-compliance at the facility.

There was one Emergency Variance granted applicable to a tank repairment in 2016. However, the variance did not relieve the federal enforcement and requirements of the storage tank. Currently, the facility is in compliance of applicable rules and requirements and is not currently operating under a variance.

5.0 Title V Applicability & Acid Rain

Title V regulation applies to any stationary source that is a major stationary source as defined in District Rule 1401(c)(26) or is subject to the acid rain provisions of Title IV of the federal Clean Air Act (CAA). SFPP, LP is a major source of VOC and federal major source of NOx. The facility is subject to Title V provisions, as discussed below.

SFPP purchased the adjacent Shell terminal in 2010. With the completion of this merger, aggregate emissions of VOC from the contiguous properties exceeded the Title V major source threshold of 100 tons/year at the time of the merger. SFPP submitted its initial Title V permit application after the merger with the initial TV permit to operate being issued in 2012.

502 (b)(10) Like Kind Replacement of rim seals

Since the last Title V permit renewal was issued in 2017, SFPP filed applications to replace rim seals from the storage tanks at the Site (refer to Table 2 for a list of 502(b)(10) applications). Rim seals are components of the storage tanks which are directly involved in minimizing emissions from the storage tanks. These components require routine replacements due to normal wear and tears. However, unlike normal identical or like-kind equipment replacement, applications are required for these changes to ensure that the design of the seals continues to meet Best Available Control Technology (BACT) standards. Each of the applications for rim seal replacements proposed designs that met BACT requirements and did not expect to increase emissions or require changes to permit conditions. These changes are not “modifications” under Title I of the clean air act, and do not cause any violation of an applicable requirement, do not contravene any federally enforceable requirements for monitoring, recordkeeping, reporting or compliance certifications, and do not result in an exceedance of emissions allowed under the permit. Therefore, these modifications meet the requirements to be considered 502(b)(10) changes. A representative engineering evaluation and related documents explaining how these projects were reviewed in detail is attached to this document.

Additional Modifications Lacking Title V Applications

The facility applied for numerous like-kind-replacements that lacked associated applications for either minor modifications or 502(b)(10) changes. These included applications APCD2019-APP-005943, APCD2019-APP-005957 and the more recent approved applications, APCD2024-APP-008120 and APCD2024-APP-008411. Presumably the lack of application was an oversight for the applications. These applications would not have triggered federal new source review, do not

affect monitoring requirements, do not trigger any requirements under CAA section 112(g) and do not cause any violations of applicable requirements. For these reasons, the changes to the related permits will be incorporated into this permit action and are contained in Appendix A.

6.0 Potential to Emit and Actual Emissions

The following table shows the actual and potential emissions for the facility that are used to establish the major source status for Title V. For all pollutants, emissions are below major source thresholds.

Table 4 Facility-wide Potential to Emit (PTE) and actual emissions from the facility.

Title V Major Source Determination (Tons per Year)				
Pollutant	Thresholds	Facility Actual Emissions*	Facility Potential to Emit**	Major Source
Highest Federal HAP	10	0.58	3.72	No
Sum of Federal HAPs	25	3.22	10.94	No
NOx	25	4.16	31.51****	Yes***
VOC	25	60.74	283	Yes
PM10	100	9.31E-03	<1	No
SOx	100	7.33E-04	<1	No
CO	100	2.45	5.59	No

*The actual emissions are from the District’s 2017 to 2021 emission inventory.

**Reported by the facility – comparable PTE emissions from initial TVP application (001313)

*** Based on the ‘severe’ ozone nonattainment designation for the San Diego Air Basin (40 CFR 81.305), the District has submitted a rule amendment for inclusion in the SIP to lower the threshold of applicability for Title V permitting to 25 tpy for NOx and VOC. Upon approval of this revision, this facility has also become a major source of NOx.

**** Refer to the attached Emission Calculations for the facility PTE. PTE of NOx is based on the maximum allowable gallon of product per year times the maximum allowable concentration of NOx in pounds per gallon according to the permit conditions.

7.0 CFR Part 64 CAM (Compliance Assurance Monitoring)

SFPP is subject to 40 CFR Part 64 and submitted a CAM plan in 2011 when applicability was established. It was identified that the incinerator exhaust temperature must be maintained within a specified range to ensure effective destruction of VOCs. Conditions existed and were incorporated into the vapor control unit’s permit that ensured sufficient combustion of VOCs is achieved and is consistent with § 64.3 requirements.

CAM operational temperature limits:

- The incinerator exhaust temperature shall be maintained at a minimum of 1,000 degrees °F, at steady-state conditions after startup, as measure at the lower thermocouple, except during flame-outs. (40 CFR Part 64-CAM & 40 CFR Part 63 MACT BBBB § 63.11092 PTO#860515 Condition 19)

CAM Emission limits:

- 0.0835 lbs VOC/1,000 gallons of product loaded (PTO# 860515 Condition 23)
- 0.0334 lbs NO_x/1,000 gallons of product loaded (PTO# 860515 Condition 29)

Throughput limits:

The total volume of all products loaded through all loading racks at this stationary source shall not exceed the following:

- 5,170,000 gallons in any day, while operating in the by-pass mode when the full size bladder installed; and
- 167,000 gallons per hour, while operating in direct mode when the full size bladder installed. (PTO# 860515 Condition 14).

Where, by-pass is the normal mode and displaced vapors are collected and routed to vapor holding tank. When the bladder pressure reaches a level, vapors are routed from the holding tank to the vapor combustion unit. In direct mode (polish mode), displaced gasoline vapors are collected and routed directly to the vapor combustion unit.

In addition, Section 2.0 of this report summarizes all the changes associated with the 5-year period leading up to this Title V permit renewal. None of these actions affected monitoring requirements, and the originally established CAM conditions remain in effect for the incinerator permit (APCD2011-PTO-860515). Refer to Table 2 for a list of Title V Op-flex seal replacement. Documentation from the original CAM review and CAM Plan are attached.

8.0 Applicable Requirements

This section summarizes the major types of requirements for this facility. These types of requirements include facility-wide and permit specific applicable requirements. Additionally for each emission unit type, the rule that results in the primary emission limitation is listed.

Table 5 General Facility-wide Applicable Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. II	10(a) 10(b)	Permits Required – (a) Authority to Construct Permits Required – (b) Permit to Operate
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	20	Standards for Granting Permits
SDCAPCD Reg. II	20.1	New Source Review (NSR)
SDCAPCD Reg. II	20.3	New Source Review (NSR)
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. II	24	Temporary Permit to Operate
SDCAPCD Reg. II	25	Appeals
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. V	98*	Breakdown Conditions: Emergency Variance

SDCAPCD Reg. VI	101	Burning Control
SDCAPCD Reg. VIII	131	Stationary Source Curtailment Plan
SDCAPCD Reg. VIII	132	Traffic Abatement Plan
SDCAPCD Reg. VIII	134	Source Inspection

**Breakdowns/variances are not recognized by EPA and cannot grant relief from federal enforcement of requirements.*

Table 6 Facility-wide Prohibitory Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	61.0	Definitions Pertaining to the Storage and Handling of Organic Compounds
SDCAPCD Reg. IV	61.1	Receiving & Storing of Volatile Organic Compounds at Bulk Plants & Bulk Terminals
SDCAPCD Reg. IV	61.2	Transfer of Organic Compounds into Mobile Transport Tanks
SDCAPCD Reg. IV	61.5	Visible Emissions Standards for Vapor Control Systems
SDCAPCD Reg. IV	61.6	NSPS Requirements for Storage of VOC
SDCAPCD Reg. IV	61.7	Spillage and Leakage of VOC
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	67.01	Architectural Coatings
SDCAPCD Reg. IV	67.17	Storage of Materials Containing VOC
SDCAPCD Reg. IV	67.3	Metal Parts and Products Coating
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. X	Subpart A*	NSPS - General Provisions
SDCAPCD Reg. XI	Subpart A*	NESHAP - General Provisions
40 CFR Part 60	Subpart A	NSPS – General Provisions
40 CFR Part 60	Subpart Kb	NSPS – Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for tank which Construction, Reconstruction, or Modification Commenced after July 23, 1984.
40 CFR Part 60	Subpart XX	Standards of Performance for Bulk Gasoline Terminals
40 CFR Part 61	Subpart A	NESHAP - General Provisions
40 CFR Part 63	Subpart A	NESHAP (MACT Standards) – General Provisions
40 CFR Part 63	Subpart BBBB	NESHAP: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
40 CFR Part 82	Subpart A	Production and Consumption Controls
40 CFR Part 82	Subpart B	Servicing of Motor Vehicle Air Conditioners
40 CFR Part 82	Subpart F	Recycling and Emissions Reduction
SDCAPCD Reg. XII	1200**	Toxic Air Contaminants – New Source Review
SDCAPCD Reg. XII	1206***	Asbestos Removal, Renovation, and Demolition

*The District has adopted these rules by reference; however, any changes made to these regulations at the federal level are not immediately adopted. In the event this creates a conflict between the District adopted and federal rules, the more stringent requirements will apply.

** Not Federally Enforceable

***The District issued its own Asbestos Rule 1206 intended to be as stringent as Subpart M. SFPP is subject to the most stringent requirements of either rule, which at the time of this report is ensured by compliance with Rule 1206.

Permit Specific Applicable Requirements:

The following Tables 7 and 8 presented the Permit Specific Applicable Requirements according to different types of permitted equipment, including Storage Tanks, loading racks and thermal oxidizer.

Table 7 Permit Specific Applicable Requirements for Storage Tank Permits

SDAPCD Permit No.	Permit Description	Applicable Rules
APCD2011-PTO-000884	10,000 gallon UST for wastewater	SDCAPCD Reg. IV, Rule 19, 21, 51, 61.7
APCD2011-PTO-000883	One (1) 4000 gallon oil/water separator tank & one (1) 4000 gallon emergency overflow tank	SDCAPCD Reg. IV, Rule 19, 20.3, 21, 51, 61.7, 67.17 40 CFR Part 63, Subpart BBBB
APCD2011-PTO-000885	4000 gallon transmix UST (connected to exiting VCU)	SDCAPCD Reg. IV, Rule 19, 20.3, 21, 51, 61.1, 61.7, 61.8 40 CFR Part 63, Subpart BBBB
APCD2006-PTO-002772	Tank MV-01; an external pan floating roof; 840,000 gallons	SDCAPCD Reg. IV, Rule 19, 20.3, 21, 51, 61.1, 61.7 40 CFR Part 60, Subpart Kb 40 CFR Part 63, Subpart BBBB
APCD2004-PTO-002773	Tank MV-02; external pan floating roof; 584,000 gallons	
APCD2007-PTO-002779	Tank MV-03; internal floating roof; 2,100,000 gallons	
APCD2007-PTO-005504	Tank MV-4; internal floating roof; 1,260,000 gallons	
APCD2006-PTO-002777	Tank MV-5; external floating roof; 1,150,000 gallons	
APCD2007-PTO-002778	Tank MV-6; external floating roof; 1,155,000 gallons	
APCD2008-PTO-002774	Tank MV-07; external floating roof; 840,000 gallons	

APCD2008-PTO-002784	Tank MV-08; external floating roof; 845,000 gallons
APCD2006-PTO-030271	Tank MV-9; an internal pan floating roof; 846,000 gallons
APCD2006-PTO-890939	Tank MV-10; an internal pan floating roof; 846,000 gallons
APCD2007-PTO-002775	Tank MV-12; external floating roof; 1,903,400 gallons
APCD2006-PTO-002776	Tank MV-13; external floating roof; 1,504,000 gallons
APCD2006-PTO-002783	Tank MV-14; an internal pan floating roof; 846,000 gallons
APCD2004-PTO-002780	Tank MV-15, internal floating roof; 840,000
APCD2006-PTO-002781	Tank MV-16; internal floating roof; 840,000 gallons
APCD2006-PTO-002782	Tank MV-18; an external floating roof; 3,415,104 gallons
APCD2006-PTO-972647	Tank MV-19; internal floating roof; 4,200,000 gallons
APCD2006-PTO-976948	Tank MV-21; internal floating roof; 558,000 gallons
APCD2006-PTO-002785	Tank MV-22; internal floating roof; 475,000 gallons
APCD2007-PTO-977156	Tank MV-25; internal floating roof; 2,163,000 gallons
APCD2007-PTO-004076	Tank MV-26; internal floating roof; 1,381,800 gallons
APCD2007-PTO-004075	Tank MV-27; internal floating roof; 1,015,000 gallons
APCD2007-PTO-004074	Tank MV-28; internal floating roof; 1,015,000 million gallons

APCD2009-PTO-004851	Tank MV-29; tank internal floating cover/cone-roof; 630,000 gallons	
APCD2007-PTO-977195	Tank MV-30; internal floating roof; 451,080 gallons	
APCD2008-PTO-004508	Tank MV-31; internal floating roof; 126,000 gallons	
APCD2004-PTO-004509	Tank MV-32 internal floating roof; 126,000 gallons	
APCD2006-PTO-008103	Tank MV-23; internal floating roof; 2,100,000 gallons (The tank was constructed in 1979 and therefore this tank is subjected to 40 CFR Part 60 – Subpart Ka)	

All 27 Product Storage Tanks at the facility follow 40 CFR Part 60 Subpart Kb, except for MV-23 associated with APCD2006-PTO-008103 following 40 CFR Part 60 Subpart Ka for construction, reconstruction or modification commencing before July 23, 1984.

Table 8 Loading Racks and Associated Equipment Permits

SDAPCD Permit No.	Permit Description	Applicable Rules
APCD2012-PTO-001130	Ethanol unloading rack	SDCAPCD Reg. IV, Rule 19, 20.3, 21, 51, 61.2, 61.7 SDCAPCD Reg. XII, Rule 1200
APCD2011-PTO-000753	Ethanol unloading system	
APCD2011-PTO-000752	Ethanol unloading system	
APCD2011-PTO-000751	Off-spec unloading station	SDCAPCD Reg. IV, Rule 19, 20.3, 21, 51, 61.2, 61.7 SDCAPCD Reg. XII, Rule 1200 40 CFR Part 63, Subpart BBBB
APCD2004-PTO-005135	Loading rack #1: Sixteen (16) bottom loading arms; shares vapor processor of permit # 860515.	SDCAPCD Reg. IV, Rule 19, 20.3, 21, 51, 61.2, 61.7, 61.8 40 CFR Part 60, Subpart XX 40 CFR Part 63, Subpart BBBB
APCD2004-PTO-005136	Loading rack #2: Twelve (12) bottom loading heads; shares vapor processor of permit #860515.	
APCD2004-PTO-005137	Loading rack #3:	

	Eight (8) bottom load arms; shares vapor processor of permit #860515	
APCD2003-PTO-005138	Loading rack #4: Eight (8) bottom load arms; shares vapor processor of permit #860515	
APCD2006-PTO-005140	Loading rack # 8 at MVS: Twelve (12) loading arms for gasoline and four (4) loading arms for diesel; shares vapor processor of permit #860515	
APCD2009-PTO-870364	Loading rack # 4: Shares four (4) vapor control connectors with eight (8) other loading arms of permit #5138; shares vapor processor of permit #860515	
APCD2006-PTO-005139	Loading rack #5: eight (8) loading arms; shares vapor processor of permit #860515	
APCD2005-PTO-860515	John Zink vapor combustion unit	SDCAPCD Reg. IV, Rule 19, 20.3, 21, 51, 61.2, 61.5, 61.7, 61.8 40 CFR Part 60, Subpart XX 40 CFR Part 63, Subpart BBBB 40 CFR Part 64, CAM

Table 9 Primary Limiting Regulations for Storage Tanks

Storage Tanks	
Pollutant	Primary Limiting Regulations
NOx	Rule 20.3
SO2	Rule 20.3
VOC	Rule 20.3; Rule 61.1; Rule 61.2; Rule 61.7; Rule 61.8; Rule 67.17 40 CFR Part 60, Subpart Ka or Kb
CO	Rule 20.3
PM10	Rule 20.3; Rule 51
Toxic Pollutants	Rule 1200
Federal HAPs	40 CFR Part 63 Subpart BBBB

Table 10 Primary Limiting Regulations for Loading Racks & Vapor Combustion Unit

Loading Racks	
Pollutant	Primary Limiting Regulations
NOx	Rule 20.3
SO2	Rule 20.3
VOC	Rule 20.3; Rule 61.2; Rule 61.7; Rule 61.8 40 CFR Part 60, Subpart XX 40 CFR Part 64, CAM
CO	Rule 20.3
PM10	Rule 20.3; Rule 51
Toxic Pollutants	Rule 1200
Federal HAPs	40 CFR Part 63, Subpart BBBBBB

Basis of Permit Conditions

This section is intended to summarize the applicable requirements for each rule that form the basis for permit conditions in each category of emission unit.

Rule 10(a)/10(b) – These rules require that the facility operator obtain an Authority Construct and/or modified Permit to Operate prior to installing, modifying or operating equipment which emits air contaminants.

Rule 19 – Specifies that facilities must provide proper access to District personnel to verify requirements and conduct any required testing.

Rule 19.3 – This rule pertains to emission inventory information and specifies what data facilities are required to maintain or provide for the District in order to conduct state and federally required emission inventory analyses. Some of the required information is also required by emission-unit specific permit conditions, but only if necessary to determine compliance with accurate requirements.

Rule 20.3 – This rule applies to any new or modified major stationary source, to any new or modified emission unit and to any relocated emission unit being moved from a stationary source if, after completion of the project, the stationary source will be a major stationary source or a Prevention of Significant Deterioration (PSD) Stationary Source. The rule requires the facility to demonstrate the Best Available Control Technology (BACT) or Lowest Achievable Emission Rate (LAER) requirements are satisfied. BACT requirements can be achieved by setting the most stringent emission limitation, or the use of the most effective emission control device or control technique, or combination thereof. The facility is equipped with a thermal oxidizer for the VOC emission control, which is considered a BACT for the bulk terminal facility.

Rule 21 (and 1421) – This rule allows the District to impose permit conditions to ensure enforceability of requirements. Rule 1421 mirrors rule 21 but applies specifically to Title V facilities and contains additional requirements related to ensuring continuous compliance with requirements and forms the basis of some conditions added to the operating permits as part of the Title V initial application.

Rule 24 – This rule defines the District’s ability to grant temporary authority to operate under the NSR program. A separate rule (1410) covers temporary operating authority under the Title V program.

Rule 25 – Outlines the requirements and process for appeals to the issuance of authorities to construct, permits to operate and modified permits to operate under the District’s NSR permitting program. Decisions on permit appeals are made by the District’s Hearing Board.

Rule 51 – The requirement of this rule is to prohibit the discharge of air contaminants or other materials in amounts that may cause harm or nuisance to people, property, or the public. This applies to all sources of emissions and is intended to protect public health, comfort, safety, and business interests. Compliance is typically ensured through proper operation and maintenance of equipment, emission controls, and process limits that prevent emissions from reaching levels that could result in nuisance or adverse impacts.

Rule 52 – The only requirement of this rule is setting a maximum particulate emission standard that applies to all equipment. Except for some equipment which is subject to Rule 53 (combustion particulate emission standards) and a few minor exceptions, all sources of particulate matter from permitted operations are subject to Rule 52. Compliance with all sources is typically ensured by operational limits or control requirements (e.g. filters) which have been evaluated to ensure that the emission concentration cannot be exceeded and are specified in permit conditions as necessary.

Rule 60 – Circumvention. This rule clarifies that circumvention of applicable requirements is not permissible – such as through piecemealing of projects or similar practices.

Rule 61.1 – This rule is applicable to the receiving and storage of any volatile organic compound (VOC) in a bulk plant or bulk terminal stationary tank which is used primarily to fill mobile transport tanks. This rule specifies standards for tank controls, rim seals and replacements, gaps between closure devices and structures, vents, openings, leaks, and associated inspection, recordkeeping and maintenance requirements which are specified in the permits.

Rule 61.2 – This rule is applicable to the transfer of any volatile organic compound (VOC) into a mobile transport tank with a capacity of greater than 120 gallons (454 liters), It is also applicable to the transfer of any liquid compound, regardless of its vapor pressure, into any mobile transport tank with a capacity of greater than 120 gallons (454 liters) where the transfer involves the displacement or results in the generation of VOC vapors. The requirements include VOC emission standards, installing state-certified control equipment, and associated monitoring, recordkeeping and test methods which are specified in the permits.

Rule 61.7 – This rule is applicable to the facility to prohibit spillage during disconnection of transfer fittings used for transfer, unless the spillage, which would normally occur with equipment handled with minimize spillage. Equipment used should be free of defect and no fugitive liquid leaks along the liquid transfer path and storage tanks should be allowed.

Rule 61.8 – This rule requires vapor control equipment to be certified by California Air Resources Board, which is currently enforced. The current system has been certified by CARB.

Rule 98 – Defines emergency breakdown requirements which can grant temporary relief from applicable requirements during breakdowns. However, this rule is not federally enforceable and does not grant relief from any applicable requirement of the Title V permit.

Rule 1200 – This rule is the District’s toxics new source review program, which requires that projects which increase emissions of toxic air contaminants (including HAPs), do not cause excessive health risks to the surrounding community, as determined by a health risk assessment – including imposing applicable emission limits, monitoring and recordkeeping requirements. While Rule 1200 itself is not federally enforceable, in many cases these limits also result in ensuring that federally applicable requirements are complied with/don’t apply (e.g. ensuring a facility is not a major source of HAP by limiting emissions, or a condition preventing spray applying metal TACs in a coating booth that also serves to limit NESHAP HHHHHH applicability). Additionally, these conditions are typically imposed through an Authority to Construct and/or Permit to Operate issued pursuant to Rule 10, which is federally enforceable – and for this reason, some requirements originally imposed through Rule 1200 are also federally enforceable.

Rule 1206/40 CFR 61 Subpart M – Specifies requirements for remediation of asbestos containing materials during projects such as demolition. Rule 1206 contains applicable requirements which apply to the facility. This rule is implemented as a Compliance program and requires filing of notifications prior to any demolition involving asbestos, appropriate sampling methodologies, and control requirements when asbestos is identified.

40 CFR Part 60 Subpart Ka – This regulation applies to each storage vessel with a storage capacity greater than 151,416 liters (40,000 gallons) that is used to store petroleum liquids for which construction is commenced after May 18, 1978 with requirements including roof closure device or vapor recovery specifications, inspection procedures, and associated monitoring, and recordkeeping. These requirements are all specified in permit conditions.

40 CFR Part 60 Subpart Kb – This regulation applies to 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 commenced after July 23, 1984, and on or before October 4, 2023 with requirements including roof closure device or control device specifications, inspection procedures, and associated monitoring, and recordkeeping. These requirements are all specified in permit conditions.

40 CFR Part 60 Subpart XX – This regulation sets emission standards for VOC emissions from loading racks that requires the operation of vapor collection equipment for bulk gasoline terminal. It applies to bulk gasoline terminals with a gasoline throughput equal to or more than 75,700 Liters per day. Subpart XX set limit to each affected facility equipped with an existing vapor processing system, the emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 80 milligrams of total organic compounds per liter of gasoline loaded. Vapor pressure limits for the loading racks and mobile transport tank vapor space, vapor emission control requirement, test methods and procedures, reporting and recordkeeping are all specified in permit conditions.

40 CFR Part 63 Subpart BBBBBB – This regulation is for bulk terminal area sources, which specifically addresses to reduce emissions of hazardous air pollution (HAPs) from gasoline

storage and transfer. It requires facilities to minimize spills and leaks with submerged filling and vapor recovery units to be installed. In addition, inspection and recordkeeping are part of the requirements that have been included in the permit conditions.

40 CFR Part 64 CAM – This regulation is for pollutant-specific emission units at a major source that are required to obtain a part 70 or 71 permit because the unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. CAM applies to the vapor destruction unit at this facility which controls the VOC emissions from the loading racks for transfers to storage tanks/mobile transport trucks. Emissions from this process, without the VRU, exceed the federal major source threshold of 25 TPY VOC, therefore, the VRU is subject to CAM. Permit conditions have been included in the VRU permit to operate for the operation temperature, monitoring and recordkeeping requirements of their existing CAM plan.

9.0 Updates to the Title V Permit Incorporated into this Action

The following changes are being made to the emission unit specific permits as indicated below.

9.1 Emergency Engine Retired

APCD2011-PTO-000868 was requested removed as part of TVP Admin Amendment APCD2019-APP-005961 because the engine is no longer at the facility. Removal from TVP was granted under APP-005961 and those changes to Appendix A will be carried over into this renewal.

9.2 Soil Vapor Extraction Retired

APCD2008-PTO-974060 was retired in 2020 and will be removed from the TVP Appendix A as part of this renewal.

9.3 Rule 61.2 updates

In response to CARB's development of more stringent requirements for vapor recovery system, Rule 61.2 was updated in 2021 for facilities to maintain compliance with federal emission control requirements. Rule 61.2 updates include:

- a) a reduction in the minimum size of mobile transport tank from 550 to 120 gallons;
- b) increased vapor control efficiency from 90 % to 95%;
- c) lower the emission limit from 0.29 to 0.08 pounds of non-methane organic compounds (NMOC) per 1000 gallons of VOC loaded for facilities with an annual VOC throughput that exceeds 5,000,000 gallons per year;
- d) and removal of a military exemption.

Amended Rule 61.2 (c) standards required a CARB certified vapor recovery system:

- a) to be properly connected and used; and,
- b) limited the emissions to no more than 0.08 pounds of NMOC per 1000 gallons of VOC loaded;
- c) tank pressure to be less than or equal to 18 inches of water gauge; and,
- d) the vacuum does not exceed six (6) inches of water gauge in the mobile transport tank vapor space.

Prior to the Rule 61.2 updates, the District has already implemented PTO conditions that are more stringent than the state and federal requirements. Therefore, SFPP is in compliance with the updated Rule 61.2 requirements.

9.4 Removed District Rule 61.2 requirement from APCD2011-PTO-000884

According to District Rule 61.2 (b)(6)(i), this rule is exempt for “Emergency work that the Air Pollution Control Officer determines is necessary to protect persons or property from imminent exposure to danger or damage.” The storage tank would only be used to store VOC during a catastrophic spill or gasoline or ethanol. As a result, this storage tank is exempt from Rule 61.2.

9.5 Loading rack equipment description updated

Updated Permit APCD2004-PTO-005135

A minor permit modification of adding a Biodiesel loading arm at loading rack #1 was submitted to the District to change the number of loading arms for transmix from 2 to 1 and to increase the number of loading arm for non-gasoline products from 4 to 5.

9.6 APCD2005-PTO-860515 Rule 61.2 update

An existing condition has been in place to restrict the emissions. As per permit, APCD2005-PTO-860515, Condition 23, requires the volatile organic compounds (VOC) emissions from the incineration unit exhaust shall not exceed 0.0835 lb VOC per 1000 gallons production loaded. The current limit on the permit is more stringent than the revision of Rule 61.2 and the state requirements. Consequently, Rule 61.2 update will not affect the existing conditions of the Title V permit.

9.7 Corrected typo for the following permit conditions:

APCD2006-PTO-002772, APCD2004-PTO-002773, APCD2007-PTO-002779, APCD2007-PTO-005504, APCD2006-PTO-002777, APCD2007-PTO-002778, APCD2008-PTO-002784, APCD2006-PTO-030271, APCD2006-PTO-890939, APCD2007-PTO-002775, APCD2006-PTO-002776, APCD2006-PTO-002783, APCD2006-PTO-002781, APCD2006-PTO-002782, APCD2006-PTO-972647, APCD2006-PTO-976948, APCD2007-PTO-977156, APCD2007-PTO-004076, APCD2007-PTO-004075, APCD2009-PTO-004851, APCD2007-PTO-977195, APCD2008-PTO-004508, APCD2004-PTO-004509

Current condition 24: “Permittee shall report to the District any malfunction found during the annual inspection required by this permit. This report shall be submitted within 30 days of the inspection and shall identify the storage vessel, the nature of and date the repair was made and the reason and description of the malfunction **identified** during the annual inspection. (40 CFR Part 63 MACT BBBBBB § 63.11094)”

Updated condition 24: “Permittee shall report to the District any malfunction found during the annual inspection required by this permit. This report shall be submitted within 30 days of the inspection and shall identify the storage vessel, the nature of and date the repair was made and the reason and description of the malfunction **identified** during the annual inspection. (40 CFR Part 63 MACT BBBBBB § 63.11094)”

9.8 Added missing condition: Permit number: PTO-972647

Missing Condition CHW001: Access, facilities, utilities and any necessary safety equipment for source testing and inspection shall be provided upon request of the Air Pollution Control District.

9.9 Correct Tank size in Equipment Description: Permit number: PTO-002779

Current equipment description “Volume: 2,100,00 gallons”

Updated equipment description “Volume: 2,100,000 gallons”

9.10 Added record keeping requirements to all permits:

All records required by this permit, including emission and usage records, shall be maintained on site for at least five (5) years and made readily available to the District upon request. (40 CFR Part 63 NESHAPS BBBB)B

9.11 Changes to Loading Rack Permit Conditions for seven permits:

APCD2004-PTO-005135, APCD2004-PTO-005136, APCD2004-PTO-005137, APCD2003-PTO-005138, APCD2009-PTO-870364, APCD2006-PTO-005139, APCD2006-PTO-005140

- Modified conditions 11 and 30 as requested by the facility in the application, APCD2024-APP-008120, to align with federal regulatory requirements:
Condition 11: Updated from requiring a pressure measurement device permanently installed on the vapor collection system for each loading arm to requiring the device to be calibrated and installed on the terminal’s vapor collection system.
Condition 30: Updated from requiring repair of any leak identified during the monthly inspection to **when a leak is detected** to align with the language in Subpart BBBB)B § 63.11089.
- Updated references in Condition 1 and 5 from “40 CFR Part 63 MACT BBBB)B” to Subpart BBBB)B” to align with the citation of Subpart BBBB)B.
- Condition 10: Added pascal pressure unit for vapor return system backpressure.
- Condition 11 and 13: Updated condition references, removed the reference of MACT from “40 CFR Part 63 BBBB)B § 63.11088” and to include “40 CFR Part 60 Subpart XX § 60.503” to address the test methods for pressure measurements.
- Condition 12: Removed NESHAP reference from the condition to clarify the basis of the condition was Rule 21 for the annual calibration requirement of the pressure measurement devices.
- Condition 23, 24, 25, 26, 29, 30: Updated references from MACT BBBB)B to Subpart BBBB)B, and specified the 40 CFR Part 60 Subpart XX §60.502.
- Condition 31: Updated references to include NSPS XX 60.505.
- Condition 32: Updated CEDRI reporting requirements according to Subpart BBBB)B rule and updated effective date of the new requirements.

9.12: Changes in permit conditions in twenty eight storage tank permits.

- Proposed to add a new Condition 7 to all the internal floating roof and external floating roof storage tanks permits, requiring notification to the District prior to inspections, and allow the facility to comply with 40 CFR Part 63 Subpart WW to meet the 40 CFR Part 60 Subpart Kb requirements.

- For the seventeen Internal Floating Roof Storage Tanks with the following permit numbers:
APCD2004-PTO-004509, APCD2006-PTO-002781, APCD2006-PTO-002783, APCD2006-PTO-030271, APCD2006-PTO-890939, APCD2006-PTO-972647, APCD2006-PTO-976948, APCD2007-PTO-002779, APCD2007-PTO-004074, APCD2007-PTO-004075, APCD2007-PTO-004076, APCD2007-PTO-005504, APCD2007-PTO-977156, APCD2007-PTO-977195, APCD2008-PTO-004508, APCD2009-PTO-004851, APCD2006-PTO-008103

Condition references for Condition 2, 5, 9,10 and 12 have been updated from MACT BBBB to Subpart BBBB, and NSPS XX references have been included for the basis of the conditions.

Proposed to add a new Condition 24 to all the internal floating roof storage tanks to require maintaining the vapor concentration above the floating roof to be or below 25 percent of the lower explosive limit (LEL) and the LEL monitoring requirements according to 40 CFR Part 63 Subpart BBBB §63.11092(f) beginning May 8, 2027, or as otherwise adopted by the EPA through future regulation revisions.

Proposed to add a new Condition 25 to require record keeping of each LEL monitoring event. [Rule 21, 40 CFR Part 63 BBBB §63.11094]

Proposed to add a new Condition 26 to require repair of any equipment failures within 45 days. [40 CFR Part 60 Subpart Kb §60.113b, 40 CFR Part 63 Subpart BBBB §63.11092(f)]

- For two Internal Floating Roof permits, APCD2004-PTO-002780 and APCD2006-PTO-002785, the following new permit conditions have been proposed:

Condition 25 Proposed to add the same LEL requirement as the above internal floating roof permits.

Proposed the same condition 7 for the notification requirement to the District prior to inspection.

Proposed the same condition 27 for CEDRI reporting requirement as per the same condition as the internal floating roof tanks.

- For the nine external floating roof storage tanks:
APCD2004-PTO-002773, APCD2006-PTO-002772, APCD2006-PTO-002776, APCD2006-PTO-002777, APCD2006-PTO-002782, APCD2007-PTO-002775, APCD2007-PTO-002778, APCD2008-PTO-002784, APCD2008-PTO-002774

Condition 13 has been added to the permits to add existing NESHAP accumulated area of gaps between the tank wall and the primary mechanical shoe 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. Measurements of gaps between the tank wall and

primary seal shall be conducted at least once every five (5) years.(40 CFR Part 60 Subpart Kb §60.113b)

Condition 28 has been updated according to the NESHAP latest revision for the semiannual excess emissions and compliance reports to the EPA and the district and the CEDRI reporting requirements with the effective date of May 8, 2027.

9.13: Changes in conditions for the one combustion unit permit – APCD2005-PTO-860515:

Updated regulation references and removed “MACT” from the citation of 40 CFR Part 63 BBBB, to align with the official regulatory wording. (Condition 1,4,5,6,7,12,13,18,19,20, 23,33,34, and 35)

Proposed to add a new condition 22, for the requirements to install, operate and maintain a Continuous Parameter Monitoring System (CPMS) in accordance with the revision of the 40 CFR Part 63 Subpart BBBB, and included a 3-hour rolling average combustion temperature requirement during gasoline loading, and added an effective date of the requirements.

A new Condition 29 for the vapor return system has been updated to include pascal unit to add clarity of the vapor space pressure requirements.

Condition 39 has been revised to reflect the latest NESHAP CEDRI reporting requirement for electronic submittal of the semiannual excess emissions and compliance reports to the EPA.

10.0 Multiple Applicable Requirements Streamlining

No streamlining of conditions is included in the permit.

11.0 Permit Shields

Rule 1410(p) reads: *“Any source seeking a permit pursuant to this regulation may request that a permit shield be provided, to preclude enforcement of specific enumerated requirements where the Air Pollution Control Officer has determined in writing that such requirements are not applicable to the source and summarized the determination in the permit, or to limit enforcement to permit conditions for specified applicable requirements where the Air Pollution Control Officer has determined that compliance with such conditions may be deemed compliance with the underlying specified applicable requirements and the requirements are specifically identified as such in the permit...”*

Rule 1401 defines *permit shield* as the protection from enforcement of certain applicable requirements in the manner and to the extent provided in Rule 1410(p).

The previously issued permit included permit shields, and the applicant requested the same permit shields. The District reviewed these requests and made determinations as follows:

Table 4 Permit Shields and Changes since the issuance of previous Title V permit

Regulation	Description
40 CFR Part 63-Subpart R	The District has evaluated and determined this facility is not a major source of HAPs. This rule only applies to major sources, and therefore a permit shield is granted because this facility is not subject to this rule and permit conditions ensure that the facility does not conduct any operations which would be subject to the rule.
40 CFR Part 63-Subpart EEEE	The District has evaluated and determined this facility is not a major source of HAPs. This rule only applies to major sources, and therefore a permit shield is granted because this facility is not subject to this rule and permit conditions ensure that the facility does not conduct any operations which would be subject to the rule.
40 CFR Part 63-Subpart GGGG	The District has evaluated and determined this facility is not a major source of HAPs. This rule only applies to major sources, and therefore a permit shield is granted because this facility is not subject to this rule and permit conditions ensure that the facility does not conduct any operations which would be subject to the rule.
40 CFR Part 60-Subpart K	This rule applies only to equipment for which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. All equipment at this facility has applicability dates after May 19, 1978, so this rule does not apply to any operations at this facility (instead the facility is subject to Subpart Kb)
40 CFR Part 60-Subpart Ka	This rule applies only to equipment for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. All equipment at this facility has applicability dates after May 19, 1978, so this rule does not apply to any operations at this facility (instead the facility is subject to Subpart Kb)

12.0 Monitoring, Recordkeeping and Reporting

Permit enforceability is dependent largely on sufficient monitoring, record-keeping, and reporting (MRR), all of which must be effectively tied to the emissions limits and other requirements under applicable regulations. The District permits that are incorporated into the Title V permit at Appendix A contain substantial monitoring, record-keeping, and reporting requirements. The body of the Title V permit contains additional MRR pursuant to District Regulation XIV (Title V) to further strengthen the permit.

All permitted units had minor changes made, specifically rule references added/updated to clarify the basis of the applicable requirement, but all MRR requirements remain unchanged from the previous renewal.

13.0 Permit Process-Public Notification and Notice to EPA and Affected States

Before issuing the final permit, the District will provide the opportunity for review by EPA and affected states and a public notice period. Notice will be provided to the EPA electronically through the EPS and will be sent electronically to affected states and tribes. The public notice and associated documents will be provided on our website, and the public notice will be published in a newspaper.

The public notice contains information on how to petition EPA for review of a proposed action.

If no comments or objections are received, the District intends to promptly issue the Title V permit after conclusion of the review period. If comments are received the District will review and respond to the comments as necessary. If comments identify issues which require modification to the permit, revisions will be made and the permit either issued if the changes do not require re-review by EPA or the public, or will be re-noticed if changes are made which do require review.

14.0 Recommendations

The facility is expected to comply with all applicable requirements including those cited in the current District permit as well as those under District Rule 1401 and 40 CFR Part 70. Therefore, the recommendation of this report is for the subject renewal Title V permit to be issued following public notice, EPA review, and response to any comments.

15.0 Attachments

The following are attached:

- Application Package
- Draft Permit
- Public Notice
- Engineering Evaluations
 - Ethanol unloading rack - APCD2007-APP-985777
 - Loading Rack - APCD2007-APP-985777
 - Seal rim ring replacement - APCD2021-APP-006743
 - UST for wastewater - APCD2010-APP-001065
 - Vapor Control Thermal Oxidizer - APCD2001-APP-976206
- Appendix A - Permits to Operate
- Appendix B - Rule Reference Table
- Appendix C - Abbreviations