

**Bay Area Air Quality Management District**

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San Francisco, CA 94109  
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**Permit Evaluation  
and  
Statement of Basis  
for  
INITIAL**

**MAJOR FACILITY REVIEW PERMIT**

for  
**SFPP, L.P.**  
**Facility # A4021**

**Facility Address:**  
950 Tunnel Avenue  
Brisbane, CA 94005

**Mailing Address:**  
1100 Town & Country Road  
Orange, CA 92868

January 2013

Application Engineer: Xuna Cai  
Site Engineer: Xuna Cai

Application: 17167

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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. The facility estimated the facility-wide potential to emit VOC to be approximately 114 tons per year, including fugitive emissions. 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 A4021.

This application is for an initial Title V permit.

### **B. Facility Description**

SFPP, L.P. is a bulk terminal where refined petroleum products are stored in storage tanks and dispensed by loading racks into tanker trucks for distribution. The facility operates 24 hours a day, 7 days per week, and 52 weeks per year. Emissions from the facility are primarily volatile organic compounds, the main pollutant of concern.

Permitted sources at this bulk terminal include 16 internal floating roof tanks, 4 underground sumps, 5 truck loading racks, 1 ethanol unloading system, 1 off-specification unloading system, 1 oil-water separator, and 1 emergency diesel generator. The five truck loading racks are abated by one vapor recovery system consisting of a vapor recovery unit (A-1) and a vapor burner (A-2). The oil-water separator is abated by two carbon adsorbers (A-3 and A-4) arranged in series.

Normally, the facility operates the five truck loading racks under bypass mode. Under this operational mode, captured hydrocarbon vapors from the racks are allowed to accumulate in a

vapor holding tank, which has a sealed, expandable inner bladder. The volume of the bladder expands as hydrocarbon vapors enter, until a pre-set level limit is reached. Then hydrocarbon vapors are fed to the thermal oxidizer, and the vapors are combusted to oxidation at high temperature. When the vapor holding tank system malfunctions, the facility operates the racks under direct mode, which means that captured vapors from the racks are directly fed to the thermal oxidizer for control prior to emitting to the atmosphere.

## **C. Permit Content**

The legal and factual basis for the permit 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. If the Title IV (Acid Rain) requirements for certain fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. Many of these conditions derive from 40 CFR § 70.6, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District's General Provisions and Permitting rules.

### **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., A-24). If a source is also an abatement device, such as when an engine controls VOC emissions, it will be listed in the abatement device table but will have an "S" number. An abatement device may also be a source (such as a thermal oxidizer that burns fuel) of secondary

emissions. If the primary function of a device is to control emissions, it is considered an abatement (or “A”) device. If the primary function of a device is a non-control function, the device is considered to be a source (or “S”).

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 a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with state law and the District’s regulations.

### **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.

### **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.

### **Complex Applicability Determinations**

#### **112(j) of Clean Air Act:**

As shown by the calculations below, the facility-wide emissions for a single hazardous air pollutant (HAP) are less than 10 TPY and the total HAP are less than 25 TPY. Therefore, the facility is not subject to 112(j) of the Clean Air Act because it is not a major source of hazardous air pollutants.

#### Assumptions:

- The highest emitting scenario at this facility is from storage and loading of gasoline.
- Facility-wide PTE of VOC = 114 TPY
- HAP concentrations by weight in VOC are taken from Table 11.3-2 of EPA's Emission Inventory Improvement Program Volume III, Chapter 11, Gasoline Marketing (Stage I and Stage II), revised January 2001.

Benzene = (0.9%) (114 TPY) = 1.026 TPY  
Ethyl Benzene = (0.1%) (114 TPY) = 0.114 TPY  
n-hexane = (1.6%) (114 TPY) = 1.824 TPY  
Naphthalene = (0.05%) (114 TPY) = 0.057 TPY  
Toluene = (1.3%) (114 TPY) = 1.482 TY  
2,2,4-Trimethylpentane = (0.8%) (114 TPY) = 0.912 TPY  
Xylene = (0.5%) (114 TPY) = 0.57 TPY

Total HAP Emissions = 5.985 TPY

#### **CAM:**

The VOC emissions from the gasoline truck racks (S-21 through 25), prior to abatement, exceed 100 tons per year, so the requirements of 40 CFR 64 Compliance Assurance Monitoring (CAM) apply. However, as shown by the calculations below, the abated VOC emissions from S-21 through 25 are less than 100 tons per year, so the facility is required to submit the CAM plan as part of application for a renewal of the Title V permit per §65.5(b).

Basis:

- The facility-wide permitted throughput is 876,000,000 gallons of organic liquid/year per Permit Condition Number 4275.
- The applicable emission standard is 0.04 lb/1,000 gallons of organic liquid loaded per BAAQMD Regulation 8-33-301.2.

$$\begin{aligned}\text{Annual VOC Emissions (after abatement)} &= (876,000,000 \text{ gal/yr}) (0.04 \text{ lb/1,000 gal}) \\ &= 35,040 \text{ lb/yr} = 17.52 \text{ TPY}\end{aligned}$$

#### **NESHAPS:**

The facility is not subject to the requirements of 40 CFR 63, Subpart R – National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). Per §63.420(a)(1), the facility is exempt from the requirements of Subpart R because  $E_T$ , emissions screening factor (= 0.21) is <1.0. The detailed calculation for  $E_T$  as submitted by the facility is in Appendix C.

However, the facility is subject to the requirements of 40 CFR 63, Subpart BBBBBB – National Emission Standards for Hazardous Air Pollutants for Source category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities as per §63.11081(a)(1).

#### **V. Schedule of Compliance**

A schedule of compliance is required in all Major Facility Review permits pursuant to BAAQMD Regulation 2-6-409.10 which provides that a major facility review permit shall contain the following information and provisions:

“409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.”

The BAAQMD Compliance and Enforcement Division have conducted a review of compliance over the past few years and found no on-going non-compliance issues at this facility during the past few years. The compliance report is contained in Appendix A of this statement of basis.

## **VI. Permit Conditions**

The permit conditions 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.

During the Title V permit development, the District has reviewed the existing permit conditions, deleted the obsolete conditions, and, as appropriate, revised the conditions for clarity and enforceability. 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.

The regulatory basis is listed following each condition. The regulatory basis may be a rule or regulation. The District is also using the following terms for regulatory basis:

- **BACT:** This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- **Cumulative Increase:** This term is used for a condition imposed by the APCO which limits a source's operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- **Offsets:** This term is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- **PSD:** This term is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit issued pursuant to Regulation 2, Rule 2.

## **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.

The District has reviewed all monitoring and has determined the existing monitoring is adequate.

The tables below contain only the limits for which there is no monitoring or inadequate monitoring in the applicable requirements. The District has examined the monitoring for other limits and has determined that monitoring is adequate to provide a reasonable assurance of compliance. Calculations for potential to emit will be provided in the discussion when no monitoring is proposed due to the size of a source.

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) whether there is some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.

These factors are the same as those historically applied by the District in developing monitoring for applicable requirements. It follows that, although Title V calls for a re-examination of all monitoring, there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. It is possible that, where a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still be appropriate in the Title V permit if, for instance, there is little likelihood of a violation. Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring only when it can support a conclusion that existing monitoring is inadequate.

POC Sources

<b>S# &amp; Description</b>	<b>Citation of Limit</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-35, Ethanol Unloading Rack	BAAQMD 8-6-304	0.17 lb/1000 gallons loaded	None
S-36, Off-specification Fuel Unloading Rack	BAAQMD 8-2-301	Total Carbon not more than 15 lb/day & 300 ppm	None

POC Discussion:

S-35, Ethanol Unloading Rack, is used to unload ethanol from trucks to above ground storage tanks. Regulation 8-6-304 limits VOC emissions to 0.17 pounds per 1000 gallons of ethanol loaded. POC emissions are controlled by a vapor balance system with a control efficiency of 95%. The violation of the control efficiency and the emission limit are unlikely. Therefore, no monitoring is necessary for this source for this emission limit.

S-36, Offspecification Fuel Unloading Rack, is used to unload product (gasoline), which does not meet the specifications (e.g. ethanol concentration), from trucks to above ground storage tanks. Regulation 8-2-301 specifies that total carbon emissions cannot exceed 15 pounds per day and 300 ppm. POC emissions are controlled by a vapor balance system with a control efficiency of 95%. The violation of the control efficiency and the emission limit are unlikely. Therefore, no monitoring is necessary for this source for this emission limit.

**PM Sources**

<b># &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-33, EMERGENCY DIESEL GENERATOR	BAAQMD 6-303.1 and SIP 6-303.1	Ringelmann 2.0 for 3 min. or less/hr	None
S-33, EMERGENCY DIESEL GENERATOR	BAAQMD 6-305 and SIP 6-305	Visible Particles	None
S-33, EMERGENCY DIESEL GENERATOR	BAAQMD 6-310 and SIP 6-310	0.15 gr/dscf	None

**PM Discussion:**

In accordance with the June 24, 1999 “Periodic Monitoring Recommendations for Generally Applicable Requirements” prepared by the CAPCOA/CARB/EPA Region IX periodic monitoring workgroup, no opacity monitoring is required for diesel standby and emergency reciprocating engines. In accordance with the July 2001 “CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources,” a facility is not required to monitor the engine exhaust from non-utility distillate-oil-fueled emergency piston-type IC engines, but the facility must maintain records of all engine usage. S-33 is a diesel standby engine, so no monitoring is required for these PM limits. However, the facility is required to keep records of the engine usage.

**SO<sub>2</sub> Sources**

<b># &amp; Description</b>	<b>Emission Limit Citation</b>	<b>Federally Enforceable Emission Limit</b>	<b>Monitoring</b>
S-33, EMERGENCY DIESEL GENERATOR	BAAQMD 9-1-301	Ground level concentrations of SO <sub>2</sub> shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours	None
S-33, EMERGENCY DIESEL GENERATOR	BAAQMD 9-1-304	Liquid fuel < 0.5% wt. sulfur	Fuel Certification

**SO<sub>2</sub> Discussion:**

Area monitoring to demonstrate compliance with the ground level SO<sub>2</sub> concentration requirements of Regulation 9-1-301 is at the discretion of the APCO (per BAAQMD Regulation 9-1-501). This facility does not have equipment that emits large amounts of SO<sub>2</sub>. Therefore, the APCO has not required the facility to have ground level monitoring.

The limit for sources that burn liquid fuel is 0.5% of sulfur by weight in fuel according to BAAQMD Regulation 9-1-304. The standard monitoring for this limit is fuel certification. S-33

will burn California Diesel, which has a maximum sulfur content of 0.0015% by weigh. Therefore, compliance with this standard is expected.

### **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.

### **IX. Permit Shield**

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a major facility review permit explaining that specific federally enforceable regulations and standards do not apply to a source or group of sources, or (2) A provision in a major facility review permit explaining that specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting are subsumed because other applicable requirements for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits.

The second type of permit shield is allowed by EPA's White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program. The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

This facility has no permit shields.

### **D. Alternate Operating Scenarios**

No alternate operating scenario has been requested for this facility.

### **E. Compliance Status**

The attached office memorandum from the Director of Compliance and Enforcement to the Director of Engineering dated November 14, 2013, presents a review of the compliance record of SFPP, L.P. (Site # A4021). The Compliance and Enforcement Division staff has reviewed the District compliance records for SFPP, L.P. for the period beginning December 7, 2007 through November 14, 2013. This review was initiated as part of the District evaluation of the application

for an initial Title V permit that was submitted by SFPP, L.P. During the period subject to review, activities known to the District include:

- The District issued six Notices of Violation during this review period, and all of them have been either cleared or canceled.
- The District received one air pollution complaint alleging SFPP, L.P. as the source.
- The facility is not operating under a Variance or an Order of Abatement from the District Board.
- There were ten monitor excesses or equipment breakdowns reported to or documented by District staff. One of the equipment breakdowns resulted in a Notice of Violation which has been subsequently cleared.

The responsible official for SFPP, L.P. certified that all equipment was operating in compliance on January 8, 2014 by submitted a completed and signed certification statement form. No ongoing non-compliance issues have been identified to date.

**APPENDIX A**  
**BAAQMD COMPLIANCE REPORT**

**COMPLIANCE & ENFORCEMENT DIVISION**

**Inter-Office Memorandum**

**November 14, 2013**

TO: JIM KARAS – DIRECTOR OF ENGINEERING   
FROM: WAYNE KINO – DIRECTOR OF COMPLIANCE & ENFORCEMENT   
SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

**A4021 - SFPP, LP**

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**Background**

This review was initiated as part of the District evaluation of an application by SFPP, LP, for a Title V Permit. It is standard practice of the Compliance and Enforcement Division to undertake a compliance record review in advance of issuing a Title V Permit. The purpose of this review is to assure that any non-compliance problems identified during the prior six-year period have been adequately addressed, or, if non-compliance persists, that a schedule of compliance is properly incorporated into the Title V permit compliance schedule. In addition, the review checks for patterns of recurring violation that may be addressed by additional permit terms. Finally, the review is intended to recommend, if necessary, any additional permit conditions and limitations to improve compliance.

**Compliance Review**

Compliance records were reviewed for the time period from December 7, 2007 (the date of initial Title V application) through November 14, 2013. The results of this review are summarized as follows.

**1. Violation History**

Staff reviewed SFPP, LP, Annual Compliance Certifications and found no ongoing non-compliance and no recurring pattern of violations.

Staff also reviewed the District compliance records for the review period. During this period SFPP, LP, activities known to the District include:

REVIEW OF COMPLIANCE RECORD OF:

**SFPP, LP - A4021**

Date: November 14, 2013

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District-issued 6 Notice of Violation(s):

NOV#	Regulation	Date Occur	# of Days	Comments	Disposition
A50202	8-5-305.3	4/1/1994	1	Inadequate view ports BT-13	Cleared
A50648	8-5-328	5/10/2011	1	NOV issued in error	Canceled
A52279	8-5-320.3	3/29/2012	1	Gaps in seals BT-9	Cleared
A52291	2-6-426.2	12/28/2008	5	Five annual compliance certs not submitted	Cleared
A52296	8-5-328	5/10/2011	3	Three non-compliant tank degas events	Cleared
A52297	8-33-301	3/21/2013	1	Failed source test, direct mode	Cleared - not operating in direct mode

## 2. Complaint History

The District received 1 air pollution complaints alleging SFPP, LP, as the source during the period reviewed.

## 3. Reportable Compliance Activity

Reportable Compliance Activity (RCA), also known as "Episode" reporting, is the reporting of compliance activities involving a facility as outlined in District Regulations and State Law. Reporting covers breakdown requests, indicated monitor excesses, pressure relief device releases, inoperative monitor reports and flare monitoring.

Within the review period, the District received 10 notifications for RCA's. One NOV was issued as a result of these RCA's.

RCA	Date Occur	# of Days	Comments	Disposition
05G46	6/23/2008	10	Puddle on roof BT-10	Breakdown relief granted
05H43	8/20/2008	1	Ladder seal stuck BT-4	Breakdown relief granted
05K55	1/10/2009	1	Backpressure exceedence	Breakdown relief granted
05K56	1/10/2009	1	Backpressure exceedence	Breakdown relief granted
05K85	1/23/2009	1	Pump seal leaking	No action
05L67	4/7/2009	1	Gasoline leak	No action
05T12	4/19/2010	1	Inoperative monitor	No action
05Y79	2/28/2011	1	Excess emission	No action/no excess occurred
06E53	3/29/2012	1	Gap in ladder seal	NOV #A52279
06H88	11/28/2012	1	Inoperative monitor	No action

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SFPP, LP - A4021  
Date: November 14, 2013  
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#### **4. Enforcement Agreements, Variances, or Abatement Orders**

There were no enforcement agreements, variances, or abatement orders for SFPP, LP, over review period.

#### **Conclusion**

Following its review of all available facility and District compliance records from December 7, 2007 (the date of initial Title V application) through November 14, 2013, the District's Compliance and Enforcement Division has determined that SFPP, LP was in intermittent compliance from the date of the initial application date through the present. SFPP, LP, has demonstrated no evidence of ongoing noncompliance and no recurring pattern of violations that would warrant consideration of a Title V permit compliance schedule for this facility.

Based on this review and analysis of all the violations for the review period, the District has concluded that no schedule of compliance or change in permit terms is necessary.

## APPENDIX B

### GLOSSARY

**ACT**

Federal Clean Air Act

**APCO**

Air Pollution Control Officer

**ARB**

Air Resources Board

**BAAQMD**

Bay Area Air Quality Management District

**BACT**

Best Available Control Technology

**Basis**

The underlying authority which allows the District to impose requirements.

**CAA**

The federal Clean Air Act

**CAAQS**

California Ambient Air Quality Standards

**CAPCOA**

California Air Pollution Control Officers Association

**CEQA**

California Environmental Quality Act

**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.

**Excluded**

Not subject to any District regulations.

**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 EPA-approved program that has been incorporated into the SIP.

**FP**

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

**HAP**

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by 40 CFR Part 63.

**Major Facility**

A facility with potential emissions of: (1) at least 100 tons per year of regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants as determined by the EPA administrator.

**MFR**

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Federal Clean Air Act and implemented by District Regulation 2, Rule 6.

**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.

**NMHC**

Non-methane Hydrocarbons (Same as NMOC)

**NMOC**

Non-methane Organic Compounds (Same as NMHC)

**NO<sub>x</sub>**

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.

**Phase II Acid Rain Facility**

A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

**POC**

Precursor Organic Compounds (same as THC)

**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.

**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

**THC**

Total Hydrocarbons (NMHC + Methane) (same as POC)

**Title V**

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

**TOC**

Total Organic Compounds (NMOC + Methane, Same as THC)

**TPH**

Total Petroleum Hydrocarbons

**TSP**

Total Suspended Particulate

**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 <sup>2</sup>	=	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 C

### 40 CFR Subpart R Emissions Screening Factor Calculation