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BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

July 26, 2019

Almira Van
Air Quality Inspector II
BAAQMD
375 Beale St #600
San Francisco, CA 94105

1. ☐ RECEIVED IN
ENFORCEMENT: 7/29/19
855/LD

**Subject: Equilon Enterprises LLC dba Shell Oil Products US
Martinez Terminal (Plant # B1956)
Title V Semi-Annual Monitoring Report**

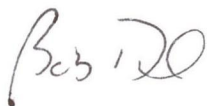
Dear Ms. Van:

Pursuant to Section F of the Standard Conditions found in the Major Facility Review Permit issued February 4, 2015, there were no instances of non-compliance during the period beginning on January 1, 2019 through June 30, 2019 for the Martinez Terminal (plant #B1956).

Questions regarding this report should be directed to:

Theresa Geijer
Environmental Advisor
Shell Oil Products US
2555 13th Ave SW.
Seattle, WA 98134
(206) 618-9061
theresa.geijer@shell.com

Sincerely,



Bob Dicks
Facilities Manager, Shell Oil Products US

**Equilon Enterprises, LLC, dba Shell Oil Products US Martinez Terminal
Facility: B1956**

Title V Semi-Annual Monitoring Verification Report

The frequency of monitoring is defined as follows: (C) Continuous or (P) Periodic. Periodic monitoring is furthered defined as follows: (A) Annual, (Q) Quarterly, (M) Monthly, (W) Weekly, (D) Daily, or (E) per Event. Limits identified in the permit as "N" (no monitoring required are not included.

Site #: B1956 Period: 1/1/2019 To: 6/30/2019
Address: 1801 Marina Vista Drive Site Name: Equilon Enterprises, LLC. dba Shell Oil Products US Martinez Terminal
City: Martinez State: CA Zip Code: 94553

**Table VII – A
Facility B1956**

Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
Ambient H2S	BAAQMD 9-2-301	Y		Ground level concentrations of 0.06 ppm for 3 min or 0.03 ppm for 60 min	BAAQMD 9-2-501 9-2-601	C	Area Monitoring	Continuous
POC	40 CFR 61.345(a)(1)(i)	Y		Container openings leak < 500 ppm	40 CFR 61.345(a)(1)(i)	P/A	Method 21 Inspection	Continuous
POC	40 CFR 61.345(b)	Y		Containers closed & properly gasketed	40 CFR 61.345(b)	P/Q	Visual Inspection	Continuous

**Equilon Enterprises, LLC, dba Shell Oil Products US Martinez Terminal
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Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
POC	40 CFR 61.345(c)	Y		Container broken seals & gaskets repaired within 15 days	40 CFR 61.356(g)	P/Q	Reports	Continuous
POC	BAAQMD 8-16-111	Y		No Limit	BAAQMD 8-16-501.3	M	Records	Continuous
VOC	BAAQMD 8-40-306.4	Y		Within 45 days of excavation or 90 days of < 500 ppmw, cover with ≥ 6" uncontaminated soil or remove all contaminated soil from site or initiate treatment	BAAQMD 8-40-601.3 (≤ 250 cubic yds) 8-40-601.4 (> 250 cubic yds)	P/E	Sample every 50 cubic yds excavated (≤ 250 cubic yds) Sample every 100 cubic yds excavated (> 250 cubic yds)	Continuous

**Equilon Enterprises, LLC, dba Shell Oil Products US Martinez Terminal
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**Table VII – B
S1, S2, S3 and S5- Truck Loading Racks**

Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
Liquid Leaks	BAAQMD 8-33-205 8-33-309.6	N		3 drops/minute; or 10 mL/ disconnect, avg. over three consecutive disconnects (gasoline bulk terminal liquid fill & vapor return connectors)	BAAQMD 8-33-309.8	P/D	P/V valves, liquid fill hose & vapor hose connector seal physical inspection	Continuous
NMOC	BAAQMD Condition 24846 Part 4	Y		0.04 lb/1000 gal organic liquid loaded	BAAQMD Condition 24846 Part 7	C	NMOC monitoring	Continuous
NMOC	BAAQMD Condition 24846 Part 5	Y		0.04 lb/1000 gal organic liquid loaded in bladder bypass mode	BAAQMD Condition 24846 Part 7	C	NMOC monitoring	Continuous
NMOC	BAAQMD Condition 24846 Part 6b	Y		Backpressure not to exceed 18 inches of water when in bladder bypass mode	BAAQMD 8-33-309.10 BAAQMD Condition 25008, Part 3	C	Backpressure monitoring	Continuous
NMOC	BAAQMD Condition 24846 Part 6c	Y		Maximum of two fueling arms with two vapor recovery arms when in bladder bypass mode	BAAQMD Condition 24846 Part 7	P/H	Records	Continuous

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Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
POC	BAAQMD Condition 16991 Part 3b	Y		0.05 lb/1000 gal gasoline loaded	BAAQMD 8-33-309.13	C	POC parametric monitoring	Continuous
POC	BAAQMD 8-33-301.2 BAAQMD Condition 24846 Part 4	Y		0.04 lb/1000 gal organic liquid loaded	BAAQMD 8-33-309.13	C	POC parametric monitoring	Continuous
POC	BAAQMD Condition 25116 Part 3	Y		0.02 lb/1000 gal organic liquid loaded when abated by A-3 Portable Thermal Oxidizer	BAAQMD Condition 25116 Part 8	C	Temperature monitor	Continuous
POC	BAAQMD 8-33-216 8-33-309.5	N		3,000 ppm as C1; or 6% of LEL (gasoline bulk terminal)	BAAQMD 8-33-309.8	P/W	Hydrocarbon analyzer	Continuous
Pressure	BAAQMD 8-33-309.2	N		18.0 inches of H2O during product loading	BAAQMD 8-33-309.10 BAAQMD Condition 25008, Part 3	C	Backpressure monitor	Continuous
Pressure	BAAQMD 8-33-309.2	N		18.0 inches of H2O during product loading	BAAQMD 8-33-309.10 BAAQMD Condition 25008, Part 3	P/A	Backpressure monitor correlation test	Continuous

**Equilon Enterprises, LLC, dba Shell Oil Products US Martinez Terminal
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Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
Pressure	40 CFR 63.650(a) 63.422(a) 60.502(h)	Y		Maximum cargo tank pressure during loading: 450 mm H2O	40 CFR 63.650(a) 63.422(a) 60.503(d)	P/E	Record maximum pressure each loading event	Continuous
Temperature	BAAQMD Condition 25116 Part 8	Y		A-3 Temp > 900F when abating S1, S2, S3 and S5	BAAQMD Condition 25116 Part 8	C	Temperature Monitor	Continuous
Throughput (S-5)	BAAQMD Condition 16991, Part 2	Y		200,000 gallons gasoline loaded at S-5 in any single day	BAAQMD Condition 16991, Part 5	P/D	Records	Continuous
Throughput	BAAQMD Condition 24846, Part 1	Y		Combined gasoline loaded < 112,800 gallons/hr and < 1,967,262 gallons/day	BAAQMD Condition 24846 Part 7	P/H and D	Records	Continuous
Throughput	BAAQMD Condition 24846, Part 6a	Y		146,291 gallons total liquid loaded in any 6-hr period in bladder bypass mode	BAAQMD Condition 24846 Part 7	P/H and D	Records	Continuous
Throughput (A-3)	BAAQMD Condition 25116 Part 5	Y		A-3 natural gas fuel < 151,200 therms (14,823,529 cu ft) in any consecutive 12-month period	BAAQMD Condition 25116 Part 7	C	Totalizing Meter	Continuous
Throughput (A-3)	BAAQMD Condition 25116 Part 6	Y		A-3 propane fuel < 5,883,288 cu ft in any consecutive 12-month period	BAAQMD Condition 25116 Part 7	C	Totalizing Meter	Continuous

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Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
TOC	BAAQMD 8-33-308.1 BAAQMD Condition 24846, Part 3	N		3,000 ppm as C1; or 6% of LEL (above vapor storage tank diaphragm)	BAAQMD 8-33-308.2 BAAQMD Condition 24846, Part 3 and 7	P/W	Hydrocarbon analyzer	Continuous
Vapor Tight Cargo Trucks	40 CFR 63.650(a) 63.422(a) 60.502(e)(1) – (e)(4)	Y		Procedures for loading gasoline cargo trucks	40 CFR 63.650(a) 63.422(a) 60.502(e)(1) – (e)(4)	P/E	Records	Continuous
Vapor Tight Cargo Trucks	40 CFR 63.650(a) 63.422(a) 60.502(e)(5) 63.422(c)(2)	Y		Have a procedure in place to ensure that non-vapor tight trucks are not reloaded until new vapor tight documentation is received	40 CFR 63.650(a) 63.422(a) 60.502(e)(5) 63.422(c)(2)	P/E	Records	Continuous

**Equilon Enterprises, LLC, dba Shell Oil Products US Martinez Terminal
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**Table VII – C.1
S4 – Slop Oil Tank**

Slop tank was removed 12/6/2017.

**Equilon Enterprises, LLC, dba Shell Oil Products US Martinez Terminal
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**Table VII – C.2
S6, S7, S8 and S9 – Transportable Containers**

Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
Capacity	BAAQMD Condition 24738, Part 1	Y		2,000 total gallons	BAAQMD Condition 24738, Part 5	P/M	Records	Continuous
POC	BAAQMD Condition 24738, Part 4a	Y		148 pounds in any consecutive 12-month period	BAAQMD Condition 24738, Part 5	P/M	Records	Continuous
Throughput	BAAQMD Condition 24738, Part 2	Y		144,000 gallons in any consecutive 12-month period	BAAQMD Condition 24738, Part 5	P/M	Records	Continuous
TVP	BAAQMD Condition 24738, Part 3	Y		0.5 psia	BAAQMD Condition 24738, Part 5	P/M	Records	Continuous
TVP	BAAQMD 8-5-117 8-5-301 SIP 8-5-117 8-5-301	Y		True vapor pressure	BAAQMD 8-5-501.1	P/E initially and upon change of service	Look up table or sample analysis; Records	Continuous
VOC	BAAQMD 8-5-307.3	N		Pressure relief valve gas tight (< 500 ppm)	BAAQMD 8-5-403 8-5-403.2 8-5-605	P/SA	Method 21 portable hydrocarbon detector	Continuous

**Equilon Enterprises, LLC, dba Shell Oil Products US Martinez Terminal
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S10 – Slop Tank; Abated by A-10 Carbon Canister (Application No. 28303, Condition No. 26450)

BAAQMD issued a Permit to Operate for Source S-10, a 3,000 gallon capacity fixed roof slop tank abated by two 180 lb. carbon canisters in series (A-10), on October 17, 2017. The source has not yet been incorporated into the Title V permit, last revised on September 7, 2017. The device began operation on November 2, 2017. For the period 1/1/2019 to 6/30/2019, Shell was in continuous compliance with all parts of Permit Condition No. 26450.

**Table VII – D.1
Equipment Leak Components**

Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
VOC	BAAQMD 8-8-312	N		Controlled VWV collection system components; vapor tight	BAAQMD 8-8-402.4 8-8-504 8-8-603	P/SA	Method 21 portable hydrocarbon detector	Continuous
VOC	BAAQMD 8-8-313.2	N		Uncontrolled VWV collection system components; vapor tight	BAAQMD 8-8-313.2 8-8-402.3 8-8-504 8-8-603	P/SA	Method 21 portable hydrocarbon detector	Continuous
VOC	BAAQMD 8-8-313.2	N		Uncontrolled VWV collection system components; not vapor tight on regular semi-annual inspection	BAAQMD 8-8-313.2 8-8-402.3 8-8-504 8-8-603	P/ Reinspect within 30 days of discovery and every 30 days until controlled or returned to semi-annual inspection schedule	Method 21 portable hydrocarbon detector	Continuous
VOC	BAAQMD 8-8-312 8-8-313.2 8-8-402.1	N		Wastewater Inspection and Maintenance Plan Records	BAAQMD 8-8-505	P/E Each inspection and repair	Records	Continuous

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Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
TOC	BAAQMD 8-18-300	Y		Valves < 100 ppm, Pumps < 500 ppm, Compressors < 500 ppm, Connectors < 100 ppm, PRDs < 500 ppm General Equipment < 100 ppm	BAAQMD 8-18-401.5	P/E (24 hrs after repair and/or minimization)	Method 21 Inspection	Continuous
TOC	BAAQMD. 8-18-301	Y		General equipment leak < 100 ppm	None	P/E	Method 21 Inspection	Continuous
TOC	BAAQMD. 8-18-302.1 8-18-302.2	N		Valve leak < 100 ppm	BAAQMD. 8-18-401.2	P/Q	Method 21 Inspection	Continuous
TOC	BAAQMD 8-18-302.1 8-18-302.2	N		Inaccessible Valve leak < 100 ppm or minimize in 24 hours, repair in 7 days	BAAQMD 8-18-401.3	P/A	Method 21 Inspection	Continuous
TOC	BAAQMD 8-18-302.3 8-18-306.2 8-18-306.3 8-18-306.4	N		Non-repairable valves	BAAQMD 8-18-401.9	P/Q	Method 21 inspection	Continuous
TOC	BAAQMD 8-18-302.3 8-18-306.4	N		Mass emission rate ≤ 15 lb/day for valve with major leak (≥ 10,000 ppm)	BAAQMD 8-18-306.4 8-18-604	P/E within 45 days of leak discovery	Mass Emission Sampling	Continuous
TOC	BAAQMD 8-18-302.3 8-18-306.4	N		Mass emission rate ≤ 15 lb/day for non-repairable valve with major leak (≥ 10,000 ppm)	BAAQMD 8-18-401.10 8-18-604	P/A	Mass Emission Sampling	Continuous

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Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
TOC	BAAQMD. 8-18-303.1 8-18-303.2	N		Pump and compressor leak < 500 ppm	BAAQMD. 8-18-401.2	P/Q	Method 21 Inspection	Continuous
TOC	BAAQMD 8-18-304.1 8-18-304.2	N		Connection leak < 100 ppm	BAAQMD 8-18-401.6	P/E (Annually or APCO and EPA-approved connection inspection program)	Method 21 Inspection	Continuous
TOC	BAAQMD. 8-18-304	N		Connection opened during turnaround leak < 100 ppm	BAAQMD. 8-18-401.1	P/E (90 days after turnaround startup)	Method 21 Inspection	Continuous
TOC	BAAQMD 8-18-304.3 8-18-306.2 8-18-306.3	N		Non-repairable connection	BAAQMD 8-18-401.6	P/E (Annually or APCO and EPA-approved connection inspection program)	Method 21 inspection	Continuous
TOC	BAAQMD. 8-18-305	Y		Pressure relief valve leak < 500 ppm	BAAQMD. 8-18-401.2 8-18-401.7	P/Q	Method 21 Inspection	Continuous
TOC	BAAQMD 8-18-305	Y		Inaccessible pressure relief valve leak < 500 ppm	BAAQMD 8-18-401.3	P/A	Method 21 Inspection	Continuous
TOC	BAAQMD 8-18-305	Y		Pressure relief valve leak < 500 ppm	BAAQMD 8-18-401.8	P/E (5 working days after release)	Method 21 Inspection	Continuous

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Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"										
TOC	BAAQMD. 8-18-306.1	N		Valve, connector, pressure relief, pump or compressor must be repaired within 5 years or at the next scheduled turnaround	BAAQMD 8-18-502.4 8-18-503.1	P/Q	Report	Continuous										
TOC	BAAQMD 8-18-302.3 8-18-303.3 8-18-304.3 8-18-306.2 8-18-306.3 8-18-306.4	N		Maximum percentage awaiting repair <table><tr><th>Components</th><th>%</th></tr><tr><td>Valves (including w/major leaks) and connectors per 8-18-306.3</td><td>0.30</td></tr><tr><td>Valves w/major leaks per 8-18-306.4</td><td>0.025</td></tr><tr><td>Pressure Reliefs</td><td>1.0</td></tr><tr><td>Pumps and Compressors</td><td>1.0</td></tr></table>	Components	%	Valves (including w/major leaks) and connectors per 8-18-306.3	0.30	Valves w/major leaks per 8-18-306.4	0.025	Pressure Reliefs	1.0	Pumps and Compressors	1.0	BAAQMD 8-18-502.4 BAAQMD 8-18-306.1	P/Q P/E	Report Repair/ replace within 5 years or at next scheduled turnaround, whichever is first	Continuous
Components	%																	
Valves (including w/major leaks) and connectors per 8-18-306.3	0.30																	
Valves w/major leaks per 8-18-306.4	0.025																	
Pressure Reliefs	1.0																	
Pumps and Compressors	1.0																	
TOC	BAAQMD 8-18-307	Y		Liquid Leak more than 3 drops/min, unless minimized with 24 hrs & repaired within 7 days	None	P/E	Records	Continuous										
TOC	BAAQMD 8-18-403	Y		No evidence of leak in Pumps and Compressors	BAAQMD 8-18-403	P/D	Visual Inspection	Continuous										
TOC	BAAQMD 8-18-403	Y		Pumps and Compressors with Evidence of Leak on visual inspection	BAAQMD 8-18-403	P/E	Method 21 Inspection	Continuous										

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TOC	SIP 8-18-302	Y		Valve leak < 100 ppm or minimize in 24 hours, repair in 7 days	SIP 8-18-401.2	P/Q	Method 21 Inspection	Continuous
TOC	SIP 8-18-302	Y		Inaccessible Valve leak < 100 ppm or minimize in 24 hours, repair in 7 days	SIP 8-18-401.3	P/A	Method 21 Inspection	Continuous
TOC	SIP 8-18-303	Y		Pump and compressor leak < 500 ppm or minimize in 24 hours, repair in 7 days	SIP 8-18-401.2	P/Q	Method 21 Inspection	Continuous
TOC	SIP 8-18-304.2	Y		Connection leak < 100 ppm or minimize in 24 hours, repair in 7 days	SIP 8-18-401.6	P/E (Annually or EPA-approved connection inspection program)	Method 21 Inspection	Continuous
TOC	SIP 8-18-304.2	Y		Connection leak < 100 ppm or minimize in 24 hours, repair in 7 days	SIP 8-18-401.1	P/E (90 days after turnaround startup)	Method 21 Inspection	Continuous
TOC	SIP 8-18-306.1	Y		Valve, pressure relief, pump or compressor must be repaired within 5 years or at the next scheduled turnaround	SIP 8-18-502.4	P/Q	Report	Continuous

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Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
TOC	SIP 8-18-306.2	Y		Awaiting repair Valves < 0.5% Pressure Relief < 1% Pumps and Compressors < 1%	SIP 8-18-502.4	P/Q	Report	Continuous
TOC	BAAQMD Condition # 25008, Part 1	Y		Valves < 100 ppm, Connectors < 100 ppm	BAAQMD Condition # 25008, Part 1	P/Q	Method 21 Inspection	Continuous
TOC	BAAQMD Condition # 25008, Part 1 & 2	Y		Fugitive leak > 100 ppm found, Repair and reinspect all project components in 60 days	BAAQMD Condition # 25008, Part 2	P/E	Method 21 Inspection	Continuous

**Equilon Enterprises, LLC, dba Shell Oil Products US Martinez Terminal
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**Table VII – D.1
Equipment Leak Components**
40 CFR 60; Subpart VV – equipment leaks subject to 40 CFR 60 Subpart GGG and to 40 CFR 63 Subpart CC
BAAQMD 10-52; 10-59

Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
VOC	40 CFR 60.482-2(b)(1)	Y		Light liquid (LL) pump leak < 10,000 ppm	40 CFR 60.482-2(a)(1)	P/M	Method 21 Inspection	Continuous
VOC	40 CFR 60.482-2(a)(2) 60.482-2(d)(4)(i)	Y		LL Pump, no leak indicated by dripping liquid	40 CFR 60.482-2(a)(2)	P/W	Visual Inspection	Continuous
VOC	40 CFR 60.482-2(b)(2) 60.482-2(d)(4)(ii) 60.482-2(d)(4)(iii)(A)	Y		LL pump leak < 10,000 ppm after discovery of dripping liquid in weekly visual inspection	40 CFR 60.482-2(b)(2)(i) 60.482(d)(4)(ii)(A)	P/E (within 5 days of discovery of liquid leak)	Method 21 Inspection	Continuous
VOC	40 CFR 60.482-2(b)(2)	Y		No limit - liquid discovered dripping from LL pump in weekly inspection	40 CFR 60.482-2(b)(2)(ii)	P/E (within 15 days of detection)	Designate event as leak. Repair and remove evidence of leak	Continuous

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VOC	40 CFR 60.482-2(b)(2) 60.482-2(d)(4)(ii)	Y		No limit - liquid discovered dripping from LL pump equipped with dual mechanical seal and barrier fluid system in weekly inspection	40 CFR 60.482-2(d)(4)(ii)(B)	P/E	Designate event as leak	Continuous
VOC	40 CFR 60.482-2(d)(5)(ii) 60.482-2(d)(5)(iii)	Y		Pump sensor shall detect failure of seal system, barrier fluid system, or both based on user-determined criterion	40 CFR 60.482-2(d)(5)(i)	C or P/D	Sensor with audible alarm or checked daily	Continuous
VOC	40 CFR 60.482-2(e)	Y		Pump designated for "No detectable emissions" < 500 ppm	40 CFR 60.482-2(e)(3)	P/A	Method 21 Inspection	Continuous
VOC	40 CFR 60.482-3(d) 60.482-3(e)(2) 60.482-3(f)	Y		Compressor sensor shall detect failure of seal system, barrier fluid system, or both based on user-determined criterion	40 CFR 60.482-3(e)(1),	C or P/D	Sensor with audible alarm or checked daily.	Continuous
VOC	40 CFR 60.482-3(i)	Y		Compressor designated for "No detectable emissions" leak < 500 ppm	40 CFR 60.482-3(i)(2)	P/A	Method 21 Inspection	Continuous
VOC	40 CFR 60.482-4(a) 60.482-4(b)(1)	Y		Gas/vapor PRD leak <500 ppm	40 CFR 60.482-4(b)(2)	P/E within 5 days after release	Method 21 Inspection	Continuous

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VOC	40 CFR 60.482-7(b)	Y		Valve leak ≤ 10,000 ppm	40 CFR 60.482-7(a)(1) 60.482-7(c)	P/M or Q	Method 21 Inspection	Continuous
VOC	40 CFR 60.482-7(f)	Y		Valve designated "No detectable emissions" (< 500 ppm)	40 CFR 60.482-7(f)(3)	P/A	Measure for leaks	Continuous
VOC	40 CFR 60.482-7(h)	Y		Valve designated "Difficult to monitor" (up to 3% of total valves)" leak < 500 ppm	40 CFR 60.482-7(h)(3)	P/A	Method 21 Inspection	Continuous
VOC	40 CFR 60.482-8(a) 60.482-8(b)	Y		Pumps and valves in heavy liquid service, Pressure Relief devices (light or heavy liquid), Flanges, Connectors ≤ 10,000 ppm	40 CFR 60.482-8(a)(1) 60.486-8(c)	P/E Within 5 calendar days of evidence of AVO leak	Method 21 Inspection	Continuous
VOC	40 CFR 60.482-10(g)	Y		Hard piped closed vent systems <500 ppmv	40 CFR 60.482-10(f)(1)(i)	P/I	Method 21 Inspection	Continuous
VOC	40 CFR 60.482-10(g)	Y		Hard piped closed vent systems – no AVO leaks	40 CFR 60.482-10(f)(1)(ii)	P/A	Visual inspection	Continuous
VOC	40 CFR 60.482-10(k)	Y		Closed vent system portions designated as "Difficult to inspect" (up to 3% of total closed vent system equipment)	40 CFR 60.482-10(k)(3)	P/ every 5 years	Visual inspection	Continuous

**Equilon Enterprises, LLC, dba Shell Oil Products US Martinez Terminal
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Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
VOC	40 CFR 60.483-2 BAAQMD 8-18-404.1	Y		Individual valve that measures <100 ppm for 5 consecutive quarters may be monitored annually, if in a process unit with 5 consecutive quarters <2% valves leaking >10,000 ppm.	40 CFR 60.483-2 BAAQMD 8-18-404.1	P/Q P/A	Method 21 Inspection	Continuous

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**Table VII – D.1
Equipment Leak Components
40 CFR 61; Subpart FF**

Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
POC	40 CFR 61.343(a)(1)(i)(A)	Y		Tanks fittings leak ≤ 500 ppm	40 CFR 61.343(a)(1)(i)(A)	P/A	Method 21 Inspection	Continuous
POC	40 CFR 63.345(a)(1)(i)	Y		Container fittings leak ≤ 500 ppm	40 CFR 63.345(a)(1)(i)	P/A	Method 21 Inspection	Continuous
POC	40 CFR 61.347(a)(1)(i)(A)	Y		O/W Separator fittings leak ≤ 500 ppm	40 CFR 61.347(a)(1)(i)(A)	P/A	Method 21 Inspection	Continuous
POC	40 CFR 61.349 (a)(1)(i)	Y		Closed-vent system fittings <500 ppm above background	40 CFR 61.349 (a)(1)(i)	P/A	Method 21 Inspection	Continuous

**Equilon Enterprises, LLC, dba Shell Oil Products US Martinez Terminal
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**Table VII – D.2
ATMOSPHERIC PRESSURE RELIEF DEVICES SUBJECT TO BAAQMD 8-28**

Type of Limit	Citation of Limit	Federally Enforceable (Y/N)	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status During Period: "Continuous", "Intermittent", or "Non-Compliant"
POC	None	N		No limit	BAAQMD 8-28-402.1	P/D	Visual inspection	Continuous
POC	None	N		No limit	BAAQMD 8-28-402.2	P/ Within 5 days of a release	Visual inspection	Continuous
POC	None	Y		No limit	SIP 8-28-402	P/ Within 5 days of a release	Visual inspection	Continuous
POC	None	N		No limit	BAAQMD 8-28-503	P/E	Monitoring System	Continuous

Report of Deviations from Permit Requirements

None.