PIMA COUNTY DEPARTMENT OF ENVIRONMENTAL QUALITY

150 West Congress Street •Tucson, AZ 85701 •Phone: (520) 740-3340

AIR QUALITY OPERATING PERMIT

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

ISSUED TO

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

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

THIS PERMIT IS ISSUED SUBJECT TO THE FOLLOWING **Conditions contained in Parts A & B and Attachments C, D, E & F**

PDEQ PERMIT NUMBER **1674** PERMIT CLASS **I** EXPIRATION DATE **MAY 28, 2012**

PERMIT ISSUED THIS **TWENTYNINTH** DAY OF **MAY, TWO THOUSAND AND SEVEN**

SIGNATURE

Tina Gingras, Air Program Manager, PDEQ
TITLE

SFPP, L.P.
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SUMMARY

This operating permit is the first 5-year air quality permit issued to SFPP, L.P., Tucson Terminal, the Permittee. This facility is a *Categorical Major Source of VOC, Synthetic Minor Source of HAPs,* and a *True Minor Source of all other criteria pollutants.* This facility is a stationary source as defined by Title 17 of the Pima County Code, Title 18 of the Arizona Revised Statutes, and the Clean Air Act. The source consists of one bulk gasoline terminal with loading racks and other associated equipment (including emission control devices). In addition, the source is composed of two formerly independently owned and operated facilities. In October 2003, SFPP, L.P. acquired the Shell terminal that previously held Air Quality Permit #1692. The facility also serves as a breakout station.

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

The following emission rates are for reference purposes only and are not intended to be enforced by direct measurement unless otherwise noted in Part B of this permit.

Pollutant	Tons per Year
Nitrogen Oxides (NOx)	26
Carbon Monoxide (CO)	63
Volatile Organic Compounds (VOC)	336
Particulate Matter (as PM_{10})	1.00
Sulfur Oxides (SOx)	1.06
Lead	Negligible
Hazardous Air Pollutants (HAPs)	17.6
Greatest Component: Hexane	5.4

Emissions after the completion of construction authorized in the Alternate Operating Scenario will be as follows:

Pollutant	Tons per Year
Nitrogen Oxides (NOx)	22.51
Carbon Monoxide (CO)	53.67
Volatile Organic Compounds (VOC)	349.56
Particulate Matter (as PM_{10})	0.74
Sulfur Oxides (SOx)	1.12
Lead	Negligible
Hazardous Air Pollutants (HAPs)	18.36
Greatest Component: Hexane	5.62

PART A: GENERAL PROVISIONS

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

I. PERMIT EXPIRATION AND RENEWAL [PCC 17.12.160.D.2 & PCC 17.12.180.A.1]

A. This permit is valid for a period of five years from the date of issuance of the permit.

B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not greater than 18 months prior to the date of permit expiration.

II. COMPLIANCE WITH PERMIT CONDITIONS [PCC 17.12.180.A.8.a & b]

A. The Permittee shall comply with all conditions of this permit including all applicable requirements of Arizona air quality statutes and the air quality rules. Any permit noncompliance constitutes a violation of the Arizona Revised Statutes and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.

B. Need to halt or reduce activity not a defense. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

III. PERMIT REVISION, REOPENING, REVOCATION, AND REISSUANCE, OR TERMINATION FOR CAUSE [PCC 17.12.180.A.8.c & PCC 17.12.270]

A. The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, or termination; or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

B. The permit shall be reopened and revised under any of the following circumstances:

1. Additional applicable requirements under the Act become applicable to a major source. Such reopening shall only occur if there are three or more years remaining in the permit term. The reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to PCC 17.12.280. Any permit reopening required pursuant to this paragraph shall comply with provisions in PCC 17.12.280 for permit renewal and shall reset the five-year permit term.

2. Additional requirements, including excess emissions requirements, become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the Class I permit.

3. The control officer or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

4. The control officer or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.

C. Proceedings to reopen and issue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance. Such reopenings shall be made as expeditiously as practicable. Permit reopenings for reasons other than those stated in paragraph III.B.1 of this Part shall not result in the resetting of the five-year permit term.

IV. POSTING OF PERMIT [PCC 17.12.080]

The Permittee who has been granted an individual permit by PDEQ or a general permit by ADEQ shall maintain a complete copy of the permit onsite. If it is not feasible to maintain a copy of the permit onsite, the permittee may request, in writing, to maintain a copy of the permit at an alternate location. Upon written approval by the Control Officer, the permittee must maintain a complete copy of the permit at the approved alternative location.

V. FEE PAYMENT [PCC 17.12.180.A.9 & PCC 17.12.510]

Permittee shall pay fees to the control officer pursuant to PCC 17.12.510.

VI. ANNUAL EMISSIONS INVENTORY QUESTIONNAIRE [PCC 17.12.320]

A. When requested by the control officer, the Permittee shall complete and submit an annual emissions inventory questionnaire. The questionnaire is due by March 31 or ninety days after the control officer makes the request and provides the inventory form each year, whichever occurs later, and shall include emission information for the previous calendar year.

B. The questionnaire shall be on a form provided by or approved by the control officer and shall include the information required by PCC 17.12.320.

VII. COMPLIANCE CERTIFICATION [PCC 17.12.180.A.5 & PCC 17.12.220.A.2]

Permittee shall submit to the control officer a compliance certification that describes the compliance status of the source with respect to each permit condition. Certifications shall be submitted as specified in Part "B" of this permit.

A. The compliance certification shall include the following:

1. Identification of each term or condition contained in the permit including emission limitations, standards, or work practices that are the basis of the certification;

2. Identification of method(s) or other means used by the owner or operator for determining the compliance status of the source with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under the monitoring, related recordkeeping and reporting sections of this permit;

3. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification; and

4. A progress report on all outstanding compliance schedules submitted pursuant to PCC 17.12.220.

B. A copy of all compliance certifications for Class I permits shall also be submitted to the EPA Administrator. The address for the EPA administrator is:

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

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS [PCC 17.12.220.A.3]

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

IX. INSPECTION AND ENTRY [PCC 17.12.220.A.4]

The Permittee shall allow the control officer or the authorized representative of the control officer upon presentation of proper credentials to:

A. Enter upon the Permittee's premises where a source is located or emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;

B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and

E. Record any inspection by use of written, electronic, magnetic and photographic media.

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD [PCC 17.12.160.C.4]

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

XI EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING [PCC 17.12.040]

A. Excess Emissions Reporting [PCC 17.12.040]

1. Excess emissions shall be reported as follows:

   a. The permittee shall report to the control officer any emissions in excess of the limits established by this permit. The report shall be in 2 parts as specified below:

      i. Notification by telephone or facsimile within 24 hours of the time the permittee first learned of the occurrence of excess emission that includes all available information from 17.12.040.B. The number to call to report excess emissions is **520-740-3340.** The fax number is **520-882-7709.**

      ii. Detailed written notification by submission of an excess emissions report within 72 hours of the notification under subsection 2 above. **Send to PDEQ 150 W. Congress St., Tucson, Arizona 85701.**

   b. The excess emission report shall contain the following information:

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

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

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

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

      v. The nature and cause of the emissions;

      vi. The steps taken, if the excess emissions were the result of a malfunction, to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunctions;

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

2. In the case of continuous or recurring excess emissions, the notification requirements of this Section shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in the notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period or changes in the nature of the emissions as originally reported shall require additional notification pursuant to subsections A.1 above.

B. Permit Deviations Reporting [PCC 17.12.180.A.5.b]

Prompt reporting of deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Notice in accordance with PCC 17.12.180.E.3.d shall be considered prompt for purposes of this paragraph.

C. Emergency Provision [PCC 17.12.180.E]

1. An "Emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, that requires immediate corrective action to restore normal operation and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emission attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with the technology-based emission limitations if the conditions of PCC 17.12.180.E.3 are met.

3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

   a. An emergency occurred and that the permittee can identify the cause or causes of the emergency;

   b. At the time of the emergency, the permitted facility was being properly operated;

   c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and

   d. The permittee submitted notice of the emergency to the control officer by certified mail or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken

4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

D. Compliance Schedule [ARS § 49-426.I.5]

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

E. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown. [PCC 17.12.035]

1. Applicability

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

a. Promulgated pursuant to Sections 111 or 112 of the Act,

b. Promulgated pursuant to Titles IV or VI of the Clean Air Act,

c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. E.P.A., or

d. Included in a permit to meet the requirements of PCC 17.16.590.A.5.

2. Affirmative Defense for Malfunctions

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

a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the operator;

b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the owner or operator satisfactorily demonstrated that the measures were impracticable;

d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;

h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;

i. All emissions monitoring systems were kept in operation if at all practicable; and

j. The owner or operator's actions in response to the excess emissions were documented by contemporaneous records.

3. Affirmative Defense for Startup and Shutdown

a. Except as provided in XI.C.2 of this Part, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. The owner or operator of a source with emissions in excess of an applicable emission limitation due to startup and shutdown has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the owner or operator of the source has complied with the reporting requirements of XIII.B of this Part and has demonstrated all of the following:

i. The excess emissions could not have been prevented through careful and prudent planning and design;

ii. If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;

iii. The source's air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

iv. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

v. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

vi. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in PCC Chapter 17.08 that could be attributed to the emitting source;

vii. All emissions monitoring systems were kept in operation if at all practicable; and

viii. The Permittee's actions in response to the excess emissions were documented by contemporaneous records.

b. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to XI.B of this Part.

4. Affirmative Defense for Malfunctions During Scheduled Maintenance

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to XI.B of this Part.

5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under XI.B or C of this Part, the owner or operator of the source shall demonstrate, through submission of the data and information required by XI.E.5 and XII.B of this Part, that all reasonable and practicable measures within the owner or operator's control were implemented to prevent the occurrence of the excess emissions.

XII. RECORDKEEPING REQUIREMENTS [PCC 17.12.180.A.4]

A. Permittee shall keep records of all required monitoring information including, where applicable, the following:

1. The date, place as defined in the permit, and time of sampling or measurements;

2. The date(s) analyses were performed;

3. The name of the company or entity that performed the analyses;

4. A description of the analytical techniques or methods used;

5. The results of such analyses; and

6. The operating conditions as existing at the time of sampling or measurement.

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

C. All required records shall be maintained either in an unchangeable electronic format or in a handwritten logbook utilizing indelible ink.

XIII. REPORTING REQUIREMENTS [PCC 17.12.180.A.5.a]

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

A. Compliance certifications pursuant to VII of this Part.

B. Excess emission; permit deviation, and emergency reports in accordance with XI of this Part.

C. Performance test results in accordance with XVII.F of this Part.

D. Reporting requirements listed in Part B of this permit.

XIV. DUTY TO PROVIDE INFORMATION [PCC 17.12.160.G & PCC 17.12.180.A.8.e]

A. The Permittee shall furnish to the control officer, within a reasonable time, any information that the control officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the control officer copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee, for Class I sources, shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.

B. If the Permittee has failed to submit any relevant facts or if the Permittee has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

XV. PERMIT AMENDMENT OR REVISION [PCC 17.12.245, PCC 17.12.255 & PCC 17.12.260]

Permittee shall apply for a permit amendment or revision for changes to the facility which do not qualify for a facility change without revision under XVI of this Part, as follows:

A. Administrative Permit Amendment (PCC 17.12.245);

B. Minor Permit Revision (PCC 17.12.255);

C. Significant Permit Revision (PCC 17.12.260).

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

XVI. FACILITY CHANGES WITHOUT PERMIT REVISION [PCC 17.12.230]

A A facility with a Class I permit may make changes without a permit revision if all of the following apply:

1. The changes are not modifications under any provision of Title I of the ACT (Air Pollution Prevention and Control) or under A.R.S. 49-401.01(17);

2. The changes do not exceed the emissions allowable under the permit whether expressed therein as a rate of emissions or in terms of total emissions;

3. The changes do not violate any applicable requirements or trigger any additional applicable requirements;

4. The changes satisfy all requirements for a minor permit revision under PCC 17.12.255; and

5. The changes do not contravene federally enforceable permit terms and conditions that are monitoring (including test methods), record keeping, reporting, or compliance certification requirements.

B. The substitution of an item of process or pollution control equipment for an identical or substantially similar item of process or pollution control equipment shall qualify as a change that does not require a permit revision, if the substitution meets all of the requirements of XVI.A, D and E of this Part.

C. Except for sources with authority to operate under general permits, permitted sources may trade increases and decreases in emissions within the permitted facility, as established in the permit under 17.12.180.A.12 if an applicable implementation plan provides for the emissions trades, without applying for a permit revision and based on the seven working days notice prescribed in XVI.D of this Part. This provision is available if the permit does not provide for the emissions trading as a minor permit revision.

D. For each change under XVI.A through C of this Part, a written notice, by certified mail or hand delivery, shall be received by the control officer and the Administrator a minimum of seven (7) working days in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided less than 7 working days in advance of the change but must be provided as far in advance of the change, or if advance notification is not practicable as soon after the change as possible.

E. Each notification shall include:

1. When the proposed change will occur;

2. A description of the change;

3. Any change in emissions of regulated air pollutants;

4. The pollutants emitted subject to the emissions trade, if any;

5. The provisions in the implementation plan that provide for the emissions trade with which the source will comply and any other information as may be required by the provisions in the implementation plan authorizing the trade;

6. If the emissions trading provisions of the implementation plan are invoked, then the permit requirements with which the source will comply; and

7. Any permit term or condition that is no longer applicable as a result of the change.

F. The permit shield described in PCC 17.12.310 shall not apply to any change made under XVI.A through C of this Part. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the implementation plan authorizing the emissions trade.

G. Except as otherwise provided for in the permit, making a change from one alternative operating scenario to another as provided under PCC 17.12.180.A.11 shall not require any prior notice under XVI this Part.

H. Notwithstanding any other part of this Section, the control officer may require a permit to be revised for any change that when considered together with any other changes submitted by the same source under this section over the term of the permit, do not satisfy XVI.A of this Part.

XVII. TESTING REQUIREMENTS [PCC 17.12.050]

A. Operational Conditions During Testing

Tests shall be conducted while the unit is operating at full load under representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the control officer, testing may be performed at a lower rate. Operations during start-up, shutdown, and malfunction (as defined in PCC 17.04.340.A.) shall not constitute representative operational conditions unless otherwise specified in the applicable requirement.

B. Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual unless modified by the Control Officer pursuant to PCC 17.12.050.B.

C. Test Plan

At least 14 calendar days prior to performing a test, the Permittee shall submit a test plan to the control officer, in accordance with PCC 17.12.050.B. and the Arizona Testing Manual.

D. Stack Sampling Facilities

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

1. Sampling ports adequate for test methods applicable to the facility;

2. Safe sampling platforms;

3. Safe access to sampling platforms; and

4. Utilities for sampling and testing equipment.

E. Interpretation of Final Results

Each performance test shall be conducted using the applicable test method for the time and under the conditions specified in the applicable standard. If the Control Officer or the Control Officer's designee is present, tests may only be stopped with the Control Officer's or such designee's approval. If the Control Officer or the Control Officer's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test without good cause after the test is commenced shall constitute a failure of the test.

F. Report of Final Test Results

Unless otherwise specified in Part B, a written report of the results of all performance tests shall be submitted to the control officer within 60 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual.

XVIII. PROPERTY RIGHTS [PCC 17.12.180.A.8.d]

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

XIX. SEVERABILITY CLAUSE [PCC 17.12.180.A.7]

The provisions of this permit are severable. If any provision of this permit is held invalid, the remainder of this permit shall not be affected thereby.

XX. PERMIT SHIELD [PCC 17.12.310]

Compliance with the conditions of this permit shall be deemed compliance with the applicable requirements identified in Part "C" of this permit. The permit shield shall not apply to any change made pursuant to Section XV.B of this Part and Section XVI of this Part.

XXI. ACCIDENT PREVENTION REQUIREMENTS UNDER THE CLEAN AIR ACT (CAA Section 112(r))

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

PART B: SPECIFIC CONDITIONS
[All standards are enforceable as noted]
[References are to Title 17 of the Pima County Code unless otherwise noted]

I. APPLICABILITY

The source covered by this permit constitutes a Categorical, major source of VOC, synthetic minor source of HAPs, and a true minor source of all other criteria pollutants based on 8760 hours per year of operation and considering emissions from other emission units of the same SIC Code at this facility. Equipment specifically addressed by the permit is listed in Attachment D and falls under the following Categories:

A. NSPS Storage Vessels (Subject to 40 CFR 60 Subpart Ka);

B. NSPS Storage Vessels (Subject to 40 CFR 60 Subpart Kb);

C. Non-NSPS Storage Vessels; and

D. Loading Racks (Subject to 40 CFR 60 Subpart XX).

II. EMISSION LIMITS AND STANDARDS [PCC 17.12.180.A.2]

A. NSPS Storage Vessels (Subject to 40 CFR 60 Subpart Ka) **[Federally Enforceable Conditions]**

The provisions of this section are applicable to the NSPS affected vessel identified in Table I of Attachment D.

1. The Permittee shall equip the tank specifically identified as subject to 40 CFR 60 Subpart Ka in Attachment D with a fixed roof with an internal floating roof that meets the following specifications:

An internal floating type cover equipped with a continuous closure device between the tank wall and the cover edge. The cover is to be floating at all times, (i.e., off the leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the cover is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible. Each opening in the cover except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface. Each opening in the cover except for automatic bleeder vents, rim space vents, stub drains and leg sleeves is to be equipped with a cover, seal, or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. Automatic bleeder vents are to be closed at all times when the cover is floating except when the cover is being floated off or is being landed on the leg supports. Rim vents are to be set to open only when the cover is being floated off the leg supports or at the manufacturer's recommended setting. [40 CFR 60.112a(a)(2)]

[Material Permit Condition]

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

The provisions of this section are applicable to the NSPS affected vessels identified in Table II-A of Attachment D.

The Permittee shall equip each tank specifically identified as subject to 40 CFR 60 Subpart Kb in Attachment D with a fixed roof in combination with an internal floating roof that meets the following specifications: [40 CFR 60.112b(a)(1)]

[Material Permit Conditions]

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

2. Each internal floating roof shall be equipped with a mechanical shoe seal closure device between the wall of the storage vessel and the edge of the internal floating roof. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof. [40 CFR 60.112b(a)(1)(ii) & 40 CFR 60.112b(a)(1)(ii)(C)]

3. Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface. [40 CFR 60.112b(a)(1)(iii]

4. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR 60.112b(a)(1)(iv)]

5. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [40 CFR 60.112b(a)(1)(v)]

6. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [40 CFR 60.112b(a)(1)(vi)]

7. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR 60.112b(a)(1)(vii)]

8. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR 60.112b(a)(1)(viii)]

9. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix]

C. Non-NSPS Storage Vessels

The provisions of this section are applicable to the Non-NSPS affected storage vessels identified in Table III of Attachment D.

1. The Permittee shall not place, store, or hold in applicable storage vessels any petroleum liquid having a vapor pressure of 1.5 pounds per square inch absolute or greater under actual storage conditions, unless such tank, reservoir, or other container is a pressure tank maintaining working pressure sufficient at all times to prevent hydrocarbon vapor or gas loss to the atmosphere or is equipped with one of the following vapor loss control devices, properly installed, in operation, and in good working order: [PCC 17.16.230.A]

[Locally Enforceable & Material Permit Conditions]

   a. A floating roof consisting of a pontoon type double-deck type roof resting on the surface of the liquid contents and equipped with a closure seal to close the space between the roof eave and tank wall and a vapor balloon or vapor dome, designed in accordance with accepted standards of the petroleum industry. The control equipment shall not be used if the petroleum liquid has a vapor pressure of twelve pounds per square inch absolute or greater under actual conditions.

      i. All tank gauging and sampling devices shall be gas tight except when gauging or sampling is taking place.

      ii. Automatic bleeder vents shall be closed at all times, except when the roof is floated off or landed on the roof leg supports.

      iii. Rim vents, if provided, shall be set to open when the roof is being floated off the roof leg supports, or at the manufacturer's recommended setting.

   b. Other equipment proven to be of equal efficiency for preventing discharge of hydrocarbon gases and vapors to the atmosphere.

2. Emissions of hydrocarbons from a stationary tank, reservoir, or other container having a capacity greater than 40,000 gallons which is used for storing gasoline or other petroleum liquids must be minimized by applying and maintaining the following controls: [SIP Rule 314.A.2]

[Federally Enforceable & Material Permit Condition]

   a. An adequately maintained floating roof, refrigeration-type vapor recovery system or equivalently effective control system, if the container is used for storage of a petroleum liquid which has a vapor pressure of at least 1.5 pounds but less than 11 pounds per square inch absolute under actual storage conditions; or

   b. A refrigeration-type vapor recovery system or equivalent if the container is used for storage of a petroleum liquid which has a vapor pressure of greater than or equal to 11 pounds per square inch absolute under actual storage conditions.

3. If a refrigeration-type vapor recovery system or equivalent is employed, it must be capable of collecting at least 90 percent of the hydrocarbon vapors by weight which would otherwise be vented to the atmosphere during filling of the tank. The system must also be equipped with either an on-site or remotely located vapor-disposal system which processes the vapors so that their escape to the atmosphere is prevented. [SIP Rule 314.B]

[Federally Enforceable & Material Permit Condition]

4. Any other petroleum liquid storage vessel shall be equipped with a submerged filling device, or acceptable equivalent, for the control of hydrocarbon emissions. [PCC 17.16.230.B & SIP 314.A.3]

[Federally Enforceable & Material Permit Condition]

5. All pumps and compressors which handle volatile organic compounds shall be equipped with mechanical seals or other equipment of equal efficiency to prevent the release of organic contaminants into the atmosphere. [PCC 17.16.230.D]

[Locally Enforceable & Material Permit Condition]

6. Pursuant to the application, the Permittee shall exclusively store the allowable products listed in Attachment D of this permit. Should the Permittee desire to store other products with greater emissions, the appropriate revision shall be submitted pursuant to 17.12.230, 17.12.255, or 17.12.260. Switching between allowable products (products with lower vapor pressures than those products specified by Attachment D) shall not require notification; however, the Permittee shall update records required by V.A, V.B and V.C of Part B. [PCC 17.12.190.B]

[Federally Enforceable & Material Permit Condition]

7. Should the Permittee desire to restore tanks T-31 and T-32 to use, the Permittee shall submit the appropriate revision pursuant to PCC 17.12.230, 17.12.255, or 17.12.260.

D. Loading Racks

1. Throughput Limitation **[Federally Enforceable & Material Permit Conditions]**

The provisions of this section are applicable to the NSPS affected facilities identified in Table IV of Attachment D.

a. The combined throughput of all products through all loading racks shall not exceed 1 billion gallons in any 12-consecutive month period. [PCC 17.12.190.B]

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

The provisions of this section are applicable to the following NSPS affected facilities identified in Table IV of Attachment D.

a. The Permittee shall equip each affected loading rack with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading. [40 CFR 60.502(a)]

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

c. Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. [40 CFR 60.502(d)]

d. Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks. [40 CFR 60.502(e)]

e. The Permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. [40 CFR 60.502(f)]

f. The Permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. [40 CFR 60.502(g)]

g. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in VII.A.4. [40 CFR 60.502(h)]

h. No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). [40 CFR 60.502(i)]

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

The provisions of this section are applicable to all non-NSPS facilities identified in Tables III, V & VIII of Attachment D.

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

2. The Permittee shall not emit gaseous or odorous materials from equipment, operations or premises under his control in such quantities or concentrations as to cause air pollution. [PCC 17.16.030 & 17.16.430.D]

III. AIR POLLUTION CONTROLS

A. Thermal Oxidizer **[Federally Enforceable & Material Permit Conditions]**

1. The Permittee shall capture and route all hydrocarbon emissions from the loading racks LR-1, LR-2, and LR-3W and from the refloating of internal roofs for the breakout tanks T-6, T-7, T-8, T-14, and T-25 to the thermal oxidizer for destruction. [40 CFR 60.502(a)] [PCC 17.12.190.B]

2. The Permittee shall operate and maintain the thermal oxidizer according to the manufacturer's recommendations. Emissions from the applicable units shall not bypass the thermal oxidizer. If the manufacturer's recommendations are not available, the Permittee shall develop and propose an Operations and Maintenance Plan for the thermal oxidizer for approval by the Control Officer. [PCC 17.12.190.B]

B. Carbon Adsorption Unit. **[Federally Enforceable & Material Permit Conditions]**

1. Hydrocarbon emissions from loading rack LR-4 shall be captured and routed to the carbon adsorption unit for capture. [40 CFR 60.502(a)] [PCC 17.12.190.B]

2. The carbon adsorption unit shall be operated, recharged, and maintained according to the manufacturer's recommendations. Emissions from LR-4 shall not bypass the carbon adsorption unit. If the manufacturer's recommendations are not available, the Permittee shall develop and propose an Operations and Maintenance Plan for the carbon adsorption unit for approval by the Control Officer within 90 days of issuance of the permit. [40 CFR 60.502(a)] [PCC 17.12.190.B]

IV. MONITORING REQUIREMENTS [PCC 17.12.180.A.3]

A. NSPS Storage Vessels (Storage Vessels Subject to 40 CFR 60 Subpart Ka)

[Federally Enforceable Conditions]

The provisions of this section are applicable to the NSPS affected facilities identified in Table I of Attachment D.

None. Refer to Recordkeeping requirements.

B. NSPS Storage Vessels (Storage Vessels Subject to 40 CFR 60 Subpart Kb)

[Federally Enforceable Conditions]

The provisions of this section are applicable to the NSPS affected facilities identified in Table II-A of Attachment D.

1. Once every 12 months after initial fill, the Permittee shall inspect each storage vessel equipped with a mechanical shoe primary seal. The Permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof. If the internal floating roof is not resting on the surface of the Volatile Organic Liquid (VOL) inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the Permittee shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Control Officer in the inspection report required in VI.B.1 of Part B. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 60.113b(a)(2)]

2. The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the Permittee shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years. [40 CFR 60.113b(a)(4)]

C. Compliance Assurance Monitoring Plans for Loading Racks VOC Emissions

[Federally Enforceable Conditions]

1. Loading Rack LR-1, LR-2, and LR-3W using NAO Thermal Oxidizer as Control Device

   a. Indicator, Measurement Approach, and Data Representativeness

      i. Combustion Temperature

The Permittee shall maintain and continuously operate a temperature measurement device to measure combustion temperature in the thermal oxidizer, which is indicative of destruction efficiency of captured vapors released from the operation of loading racks LR-1, LR-2, or LR-3W in a manner necessary to comply with the VOC emission standards. [40 CFR 64.6(c)(1) & 40 CFR 60.502(b)]

[Material Permit Condition]

ii. Thermal Oxidizer Condition

To verify proper operation and efficiency of the thermal oxidizer, the Permittee shall conduct an annual inspection of the burner unit before the anniversary date of the issuance of the permit, following the manufacturer's recommended practices or the Operations and Maintenance Plan. [40 CFR 64.6(c)(1)]

[Material Permit Condition]

b. Indicator Range

i. Combustion Temperature

(A) The Permittee shall conduct a series of stack tests at various combustion temperatures to establish the minimum operating temperature needed for compliance with emissions limit. The stack testing shall be completed within 90 days after the issuance of the permit. [40 CFR 64.4(e)]

(1) A minimum combustion temperature of X°F (to be determined no later than 90 days after permit issuance) shall be maintained in the thermal oxidizer during the period exhaust vapors from the loading racks are combusted in the thermal oxidizer. [40 CFR 64.3(a)(2)]

(B) A minimum combustion temperature below X°F shall constitute an excursion. The Permittee shall initiate an investigation of the control equipment within 24 hours for possible corrective action. If corrective action is required, the Permittee shall proceed to implement such corrective action as soon as practicable. A combustion temperature below X°F in itself does not constitute a violation of the VOC standard. Failure to take corrective action as soon as practicable shall also constitute an excursion for the purposes of responding to and reporting excursions under 40 CFR 64.7. [40 CFR 64.6(c)(2)]

ii. Thermal Oxidizer Condition

Failure to follow the manufacturer's recommended practices or the Operations and Maintenance Plan as described in III.A.2 of Part B shall constitute an excursion.

c. Quality Assurance/ Quality Control (QA/QC) Practices [40 CFR 64.6(c)(1)]

i. Combustion Temperature

The Permittee shall calibrate, maintain, and operate the temperature sensor/controller instrumentation using procedures that take into account the manufacturer's recommendations, to consist, in part, of instrument accuracy checks on a semiannual annual basis. The thermocouple sensor shall meet a minimum

accuracy of ± 20 degrees Fahrenheit (°F) or ± 1.0 percent of full scale, whichever is greater.

ii. Thermal Oxidizer Condition

The Permittee shall ensure that the manufacturer's recommended practices or the Operations and Maintenance Plan is followed.

d. Data Collection Procedure & Monitoring Frequency

i. Combustion Temperature

(A) The Permittee shall conduct continuous temperature monitoring with data recorded as 1-minute average intervals at all times that the thermal oxidizer is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. [40 CFR 64.7(c)]

(B) Averaging Period

The Permittee shall install and maintain a continuous monitoring device to record combustion temperature on a 1-minute rolling average period basis. The monitoring system shall be equipped with an alarm system to indicate a combustion temperature below X°F. [40 CFR 64.6(c)(1)]

ii. Thermal Oxidizer Condition

The Permittee shall monitor the thermal oxidizer as required by the manufacturer's recommendations or Operations and Maintenance Plan. The Permittee shall keep all results of the monitoring onsite. All inspection and maintenance activity records of the thermal oxidizer shall also be kept onsite.

e. Prior to making any changes to the alarm set point described in IV.C.1.d.i.(B) of Part B, the Permittee shall submit written notification to the Control Officer. Such notification shall include the proposed new alarm set point and the reason for the proposed change. The proposed change cannot be made without the prior approval of the Control Officer. [40 CFR 64.6(c)(2)]

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

follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [40 CFR 64.7(d)(1)]

g. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [40 CFR 64.7(d)(2)]

h. In addition to the general reporting requirements of this permit, all reports of excursions shall follow the format outlined in 40 CFR 64.9(a)(2) and submitted with the report required in VI.E of Part B. For the purposes of defining "prompt" for excursions, reporting of excursions in this report shall be considered prompt reporting. [40 CFR 64.9(a)]

i. In addition to the general recordkeeping requirements of this permit, all recordkeeping shall follow the format outlined in 40 CFR 64.9(b). [40 CFR 64.9(b)]

2. Loading Rack LR-4 using John Zink Carbon Adsorber Unit as the Control Device

a. Indicator, Measurement Approach, and Data Representativeness

i. Vacuum Level during Carbon Regeneration Cycle

The Permittee shall maintain and continuously operate a vacuum level measurement device to measure maximum vacuum level during the carbon regeneration cycle, which is indicative of proper operation of the carbon adsorber unit's (CAU) efficiency of capturing vapors released from the operation of loading rack LR-4 in a manner necessary to comply with the VOC emission standards. [40 CFR 64.6(c)(1) & 40 CFR 60.502(b)]

[Material Permit Condition]

ii. Measurement of VOC Emissions Using Hand-Held Monitor

The Permittee shall monitor the concentration of VOCs in the exhaust gases from the CAU using a hand-held monitor once every quarter to verify compliance with the VOC emission standards. This monitoring shall only be done during a loading operation. Non-methane hydrocarbon concentrations measured in parts per million will be converted to milligrams of VOC/1000 liters of gasoline by using a conversion factor developed using performance test data from the year 2006.

b. Indicator range

i. Vacuum Level during Carbon Regeneration Cycle

(A) Within 90 days of permit issuance, the Permittee shall supply data verifying that a vacuum level PI-501 of 24 to 25 inches of Hg during the carbon regeneration demonstrates compliance with the VOC limit. [40 CFR 64.4(e)]

(1) Vacuum level PI-501 of 24 to 25 inches of mercury (Hg) during the carbon regeneration will be used as the indicator. [40 CFR 64.3(a)(2)]

(B) A vacuum level PI-501 is less than 24 to 25 inch Hg during the carbon regeneration cycle shall constitute an excursion. The Permittee shall initiate

an investigation of the CAU within 24 hours for possible corrective action. If corrective action is required, the Permittee shall proceed to implement such corrective action as soon as practicable. A vacuum level less than 24 to 25 inch Hg in itself does not constitute a violation of the VOC standard. Failure to take corrective action as soon as practicable shall constitute an excursion for the purposes of responding to and reporting excursions under 40 CFR 64.7. [40 CFR 64.6(c)(2)]

ii. Measurement of VOC Emissions Using Hand-Held Monitor

If the VOC concentration measured in the exhaust gases using any hand-held monitor that exhibits concentrations higher than the VOC standard, that exceedance shall constitute a violation of the standard.

c. Quality Assurance/ Quality Control (QA/QC) Practices [40 CFR 64.6(c)(1)]

i. Vacuum Level during Carbon Regeneration Cycle

The Permittee shall calibrate, maintain, and operate the vacuum sensor using procedures that take into account the manufacturer's specifications, to consist, in part, of instrument accuracy checks on a semiannual basis. The vacuum sensor shall have a minimum accuracy of ± 1.0 percent of the full scale.

ii. Measurement of VOC Emissions Using Hand-Held Monitor

The Permittee shall use a handheld device that has been calibrated for zero and full span measurements based on expected concentration of VOCs in the exhaust gases. The Permittee shall use a handheld device that has been calibrated within 6 months before VOC concentration measurement.

d. Data Collection Procedure & Monitoring Frequency

i. Vacuum Level during Carbon Regeneration Cycle

(A) The Permittee shall daily log the maximum vacuum generated during one representative regeneration cycle. Vacuum data shall be recorded manually on a log sheet. [40 CFR 64.7(c)]

(B) Averaging Period

The Permittee shall daily measure the maximum vacuum achieved during a 15-minute carbon regeneration cycle. [40 CFR 64.6(c)(1)]

ii. Measurement of VOC Emissions Using Hand-Held Monitor

(A) The VOC emissions concentration shall be monitored in the exhaust gases from the CAU every calendar quarter using a hand-held monitor. Records of the VOC concentration measurements and records of the date of calibration of hand-held equipment shall be kept in a log on site.

(B) Averaging Period

The maximum concentration measured using a hand-held monitor shall be recorded in the log once every calendar quarter during the operation of the CAU.

e. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown, or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [40 CFR 64.7(d)(1)]

f. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [40 CFR 64.7(d)(2)]

g. In addition to the general reporting requirements of this permit, all reports of excursions shall follow the format outlined in 40 CFR 64.9(a)(2) and submitted with the report required in VI.E of Part B. For the purposes of defining "prompt" for excursions, reporting of excursions in this report shall be considered prompt reporting. [40 CFR 64.9(a)]

h. In addition to the general recordkeeping requirements of this permit, all recordkeeping shall follow the format outlined in 40 CFR 64.9(b). [40 CFR 64.9(b)]

3. Loading Rack LR-1, LR-2, and LR-3W using new John Zink Thermal Oxidizer as Control Device

a. Indicator, Measurement Approach, and Data Representativeness

i. Combustion Temperature

The Permittee shall maintain and continuously operate a temperature measurement device to measure combustion temperature in the thermal oxidizer, which is indicative of destruction efficiency of captured vapors released from the operation loading racks LR-1, LR-2, or LR-3W in a manner necessary to comply with the VOC emission standards. [40 CFR 64.6(c)(1) & 40 CFR 60.502(b)]

[Material Permit Condition]

ii. Thermal Oxidizer condition

To verify proper operation and efficiency of the thermal oxidizer, the Permittee shall conduct an annual inspection of the burner unit before the anniversary date of the issuance of the permit, following manufacturer-recommended practices.

[Material Permit Condition]

b. Indicator Range

i. Combustion Temperature

(A) The Permittee shall conduct a series of stack tests at various combustion temperatures to establish the minimum operating temperature needed for compliance with the emission limit. The stack testing shall be completed no later than 90 days after initial startup. [40 CFR 64.4(e)]

(1) A minimum combustion temperature of 600°F (to be verified no later than 90 days after initial startup) shall be maintained in the thermal oxidizer during the period exhaust vapors from the loading racks are combusted in the thermal oxidizer. [40 CFR 64.3(a)(2)]

(B) A minimum combustion temperature below 600°F shall constitute an excursion. The Permittee shall initiate an investigation of the control equipment within 24 hours for possible corrective action. If corrective action is required, the plant will proceed to implement such corrective action as soon as practicable. A temperature below 600°F in itself does not constitute a violation of the VOC standard. Failure to take corrective action as soon as practicable shall also constitute an excursion for the purposes of responding to and reporting excursions under 40 CFR 64.7. [40 CFR 64.6(c)(2)]

ii. Thermal Oxidizer Condition

Failure to follow the manufacturer's recommended practices or the Operations and Maintenance Plan as described in III.A.2 of Part B shall constitute an excursion.

c. Quality Assurance/ Quality Control (QA/QC) Practices [40 CFR 64.6(c)(1)]

i. Combustion Temperature

The Permittee shall calibrate, maintain, and operate the temperature sensor/controller instrumentation using procedures that take into account manufacturer's specifications, to consist, in part, of instrument accuracy checks on a semiannual basis. The thermocouple sensor will meet a minimum accuracy of ± 20°F or ± 1.0 percent of full scale, whichever is greater.

ii. Thermal Oxidizer Condition

The Permittee shall ensure that manufacturer recommended practices or the Operations and Maintenance Plan is followed.

d. Data Collection Procedure and Monitoring Frequency

i. Combustion Temperature

(A) The Permittee shall conduct continuous temperature monitoring with data recorded as 1-minute average intervals at all times that the thermal oxidizer is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used, including data averages and

calculations, or fulfilling a minimum data availability requirement, if applicable. [40 CFR 64.7(c)]

(B) Averaging Period

The Permittee shall install and maintain a continuous monitoring device to record combustion temperature on a 1-minute rolling average period basis. The monitoring system will be equipped with an alarm system to indicate a combustion temperature below 600°F. [40 CFR 64.6(c)(1)]

ii. Thermal Oxidizer Condition

The Permittee shall monitor the thermal oxidizer as required by the manufacturer's recommendations or Operations and Maintenance Plan. The Permittee shall keep all results of the monitoring onsite. All inspection and maintenance activity records of the thermal oxidizer shall also be kept onsite.

e. Prior to making any changes to the alarm set point described in IV.C.3.d.i.(B) of Part B, the Permittee shall submit written notification to the Control Officer. Such notification shall include the proposed new alarm set point and the reason for the proposed change. The proposed change cannot be made without the prior approval of the Control Officer. [40 CFR 64.6(c)(2)]

f. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown, or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [40 CFR 64.7(d)(1)]

g. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [40 CFR 64.7(d)(2)]

h. In addition to the general reporting requirements of this permit, all reports of excursions shall follow the format outlined in 40 CFR 64.9(a)(2) and submitted with the report required in VI.E of Part B. For the purposes of defining "prompt" for excursions, reporting of excursions in this report shall be considered prompt reporting. [40 CFR 64.9(a)]

i. In addition to the general recordkeeping requirements of this permit, all recordkeeping shall follow the format outlined in 40 CFR 64.9(b). [40 CFR 64.9(b)]

D. Non-NSPS Storage Vessels **[Locally Enforceable Conditions]**

The provisions of this section are applicable to the non-NSPS affected facilities identified in Table III of Attachment D.

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

E. Loading Racks [PCC 17.12.190.B]
[Federally Enforceable Conditions]

1. All Loading Racks

The provisions of this section are applicable to the affected facilities identified in Table IV of Attachment D.

The Permittee shall monitor rolling totals of throughput by complying with the recordkeeping requirements in V.D.1 of Part B.

2. NSPS Loading Racks

The provisions of this section are applicable to the NSPS affected facilities identified in Table IV of Attachment D.

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

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

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

1. Check for leaks on piping, valves, joints, seals and any other ancillary equipment that may affect emissions.

2. Tighten or replace loose, missing damaged nuts, bolts, or screws as identified by visual inspection;

V. RECORDKEEPING REQUIREMENTS [PCC 17.12.180.A.4]

A. NSPS Storage Vessels (Storage Vessels Subject to 40 CFR 60 Subpart Ka)

The provisions of this section are applicable to the NSPS affected facilities identified in Table I of Attachment D.

1. The Permittee shall maintain a record of the petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period. [40 CFR 60.115a (a)]
[Federally Enforceable Condition]

2. Available data on the typical Reid vapor pressure and the maximum expected storage temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517, unless the Administrator/Control Officer specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s). [40 CFR 60.115a (b)
[Federally Enforceable Condition]

3. The storage temperature used to calculate the maximum true vapor pressure in V.A.2 of the Specific Conditions above shall be calculated based upon the maximum local monthly ambient temperature as reported by the National Weather Service. [PCC 17.12.180.A.4]
[Locally Enforceable Conditions]

B. NSPS Storage Vessels (Storage Vessels Subject to 40 CFR 60 Subpart Kb)
[Federally Enforceable Conditions]

The provisions of this section are applicable to the NSPS affected facilities identified in Table II-A of Attachment D.

1. The Permittee shall keep copies of all records required by IV.B and V.B of Part B for at least 2 years except that the record required by V.B.4 shall be kept for the life of the source. [40 CFR 60.116b(a)]

2. The Permittee shall keep a record of each inspection performed as required by IV.B.1 and IV.B.2 of Part B. Each record shall identify: [40 CFR 60.115b(a)(2)]

   a. The storage vessel on which the inspection was performed;

   b. The date the vessel was inspected; and

   c. The observed condition of each component of the control equipment (seals, internal floating roof, and fittings).

3. For each affected tank the Permittee shall maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period. [40 CFR 60.116b(c)]

4. Available data on the storage temperature may be used to determine the maximum true vapor pressure as determined below. [40 CFR 60.116b(e)]

   a. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

b. For crude oil or refined petroleum products the vapor pressure may be obtained by the following:

i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference—see §60.17), unless the control officer specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).

ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

c. For other liquids, the vapor pressure may be:

i. Obtained from standard reference texts;

ii. Determined by ASTM D2879–83, 96, or 97 (incorporated by reference—see §60.17);

iii. Measured by an appropriate method approved by the control officer; or

iv. Calculated by an appropriate method approved by the control officer.

5. The Permittee shall keep readily accessible records showing the dimension of each applicable storage vessel and an analysis showing its capacity. [40 CFR 60.116b(b)]

C. Non-NSPS Storage Vessels **[Locally Enforceable Conditions]**

The provisions of this section are applicable to the non-NSPS affected facilities identified in Table III of Attachment D.

1. The Permittee shall record the results of IV.D.1 of Part B in a log kept on-site. The log shall include as a minimum, the results of the monitoring, the date of the monitoring, the person performing the monitoring and their initials.

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

3. Within 30 days of the end of each month the Permittee shall record the following information with respect to the breakout tanks:

a. Tank identification;

b. Product type; and

c. Total number of turnovers in the previous month.

D. Loading Racks **[Federally Enforceable Conditions]**

1. All Loading Racks

The provisions of this section are applicable to the NSPS affected facilities identified in Table IV of Attachment D.

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

a. The combined throughput of all products through all loading racks in the previous month;

b. The calculated combined throughput of all products through all loading racks in the previous 12-consecutive month period;

c. The throughput of gasoline through all loading racks in the previous month;

d. The calculated throughput of gasoline through all loading racks in the previous 12-consecutive month period; and

e. The initials of the recording personnel and date recorded.

2. NSPS Loading Racks

The provisions of this section are applicable to the NSPS affected facilities identified in Table IV of Attachment D.

a. A record of each monthly leak inspection required under IV.E.2 of Part B shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum the following information: [40 CFR 60.505(c)]

i. Date of inspection.

ii. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).

iii. Leak determination method.

iv. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).

v. Inspector name and signature.

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

i. The Permittee shall obtain the vapor tightness documentation for each gasoline tank truck which is to be loaded at the affected facility. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information: [40 CFR 60.502(e)(1) & 40 CFR 60.505(a) & (b)]

(A) Test title: Gasoline Delivery Tank Pressure Test—EPA Reference Method 27.

(B) Tank owner and address.

(C) Tank identification number.

(D) Testing location.

(E) Date of test.

(F) Tester name and signature.

(G) Witnessing inspector, if any: Name, signature, and affiliation.

(H) Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs). The tank truck vapor tightness documentation shall be kept on file at the terminal in a permanent form available for inspection.

ii. The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility. [40 CFR 60.502(e)(2)]

iii. The Permittee shall cross-check each tank identification number obtained in (V.D.2.b.ii of Part B) with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained: [40 CFR 60.502(e)(3)(i)]

(A) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or

(B) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semiannually.

iv. If either the quarterly or semiannual cross-check provided in the above paragraphs (V.D.2.b.iii.(A) & (B) of Part B) reveals that these conditions were not maintained, the Permittee shall return to biweekly monitoring until such time as these conditions are again met. [40 CFR 60.502(e)(3)(ii)]

v. The Permittee shall notify the owner or operator of each non-vapor-tight gasoline tank loaded at the facility within 1 week of the documentation cross-check described in (V.D.2.b.iii of Part B). [40 CFR 60.502(e)(4)]

vi. The Permittee shall take steps assuring that the non-vapor-tight tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained. [40 CFR 60.502(e)(5)]

vii. Alternate procedures to those described above (V.D.2.b.i through iv of Part B) for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Administrator. [40 CFR 60.502(e)(6)]

c. The Permittee shall keep documentation of all notifications required under V.D.2.b.v of Part B. [40 CFR 60.505(d)]

d. As an alternative to keeping records at the terminal of each gasoline cargo tank test result as required above (V.D.2.b of Part B), the Permittee may comply with either paragraph below (V.D.2.d.i or ii of Part B): [40 CFR 60.505(e)]

i. An electronic copy of each record is instantly available at the terminal.

(A) The copy of each record is an exact duplicate image of the original paper record with certifying signatures.

(B) The Control Officer is notified in writing that each terminal using this alternative is in compliance with this alternative.

ii. For facilities that utilize a terminal automation system to prevent gasoline cargo tanks that do not have valid cargo tank vapor tightness documentation from loading (e.g., via a card lock-out system), a copy of the documentation is made available (e.g., via facsimile) for inspection by the control officer's representatives during the course of a site visit, or within a mutually agreeable time frame.

(A) The copy of each record is an exact duplicate image of the original paper record with certifying signatures.

(B) The Control Officer is notified in writing that each terminal using this alternative is in compliance with this alternative.

E. Facility-Wide Operations

1. The Permittee shall keep records of all replacements or additions of components performed on an existing vapor processing system for at least 3 years. [40 CFR 60.505(f)] **[Federally Enforceable Condition]**

2. All records required by this permit (including records of monitoring) shall be maintained on-site for at least five years. [PCC 17.12.180.A.4.b] **[Locally Enforceable Condition]**

VI. REPORTING REQUIREMENTS [PCC 17.12.180.A.5 & 17.12.210]

A. NSPS Storage Vessels (Storage Vessels Subject to 40 CFR 60 Subpart Ka)

The provisions of this section are applicable to the NSPS affected facilities identified in Table I of Attachment D.

There are no specific NSPS reporting requirements other than those listed in Part A of this permit

B. NSPS Storage Vessels (Storage Vessels Subject to 40 CFR 60 Subpart Kb)

[Federally Enforceable Conditions]

The provisions of this section are applicable to the NSPS affected facilities identified in Table II-A of Attachment D.

1. The Permittee shall notify the control officer in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by IV.B.1 & 2 of Part B to afford the control officer the opportunity to have an observer present. If the inspection required by IV.B.1 & 2 of Part B is not planned and the Permittee could not have known about the inspection 30 days in advance of refilling the tank, the Permittee shall notify the control officer at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the control officer at least 7 days prior to the refilling. [40 CFR 60.113b(a)(5)]

2. If any of the conditions described in IV.B.1 of this Part are detected during the annual visual inspection required by that standard, a report shall be furnished to the Control Officer within 30 days of the inspection. Each report shall identify: [40 CFR 60.115b(a)(3)]

   a. the storage vessel;

   b. the nature of the defects; and

   c. the date the storage vessel was emptied or the nature of and date the repair was made.

C. Thermal Oxidizer and Carbon Adsorption Unit [PCC 17.24.050]

The Permittee shall submit manufacturer's recommendations or an Operations and Maintenance Plan for the Thermal Oxidizer(s) and Carbon Adsorption Unit within 90 days of issuance of the operating permit for existing equipment and within 90 days of installation for new equipment. Failure to submit the required documents will constitute a violation of the permit. Failure to submit the required documents shall also constitute an excursion for purposes of Compliance Assurance Monitoring.

D. Special Reporting for the Affected Source or Process [PCC 17.12.180.A.5.b]

The Permittee shall promptly submit written reports to the Control Officer of any instances of deviation from permit requirements. (Refer to XIII of Part A of this permit).

E. Semiannual Summary Reports of Required Monitoring [PCC 17.12.180.A.5.a]

The Permittee shall submit a semiannual summary report of all permit deviations (including excursions defined in IV.C (CAM) of Part B and exceedances that have occurred during the reporting period. Semiannual reports shall be due on April 30th and October 31st of each year and shall cover the period October 1st through March 31st and April 1st through September 30th, respectively. The first semiannual report may not cover a six-month period. If there are no deviations or exceedances in a reporting period, no report shall be required.

F. Compliance Certification Reporting [PCC 17.12.220]

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

G. Emissions Inventory Reporting: [PCC 17.12.320]

Every source subject to a permit requirement shall complete and submit to the control officer, when requested, an annual emissions inventory questionnaire pursuant to 17.12.320 of the Pima County Code. (See VI of Part A of this permit).

VII TESTING REQUIREMENTS [PCC 17.12.180.A.3.a & 17.20.010]

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

The Permittee shall use the following EPA approved reference test methods to conduct performance tests for the specified pollutants when required:

A. Loading Racks **[Federally Enforceable Conditions]**

The provisions of this section are applicable to the NSPS affected facilities identified in Table IV of Attachment D.

1. In conducting the performance tests required in §60.8, the Permittee shall use as reference methods and procedures the test methods in Appendix A of 40 CFR 60, except as provided in §60.8(b). The three-run requirement of §60.8(f) does not apply. [40 CFR 60.503(a)]

2. Immediately before the performance test required to determine compliance with II.D.2.b & II.D.2.g of Part B, the Permittee shall use Method 21 to monitor for leakage of vapor all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. The Permittee shall repair all leaks with readings of 10,000 ppm (as methane) or greater before conducting the performance test. [40 CFR 60.503(b)]

3. At least once during the permit term the Permittee shall determine compliance with the standards in II.D.2.b of Part B as follows: [40 CFR 60.503(c)]

   a. The performance test shall be 6 hours long during which at least 300,000 liters of gasoline is loaded. If this is not possible, the test may be continued the same day until 300,000 liters of gasoline is loaded or the test may be resumed the next day with another complete 6-hour period. In the latter case, the 300,000-liter criterion need not be met. However, as much as possible, testing should be conducted during the 6-hour period in which the highest throughput normally occurs.

   b. If the vapor processing system is intermittent in operation, the performance test shall begin at a reference vapor holder level and shall end at the same reference point. The test

shall include at least two startups and shutdowns of the vapor processor. If this does not occur under automatically controlled operations, the system shall be manually controlled.

c. The emission rate (E) of total organic compounds shall be computed using the following equation:

$$E = K\sum_{i=1}^{n}\left(V_{esi}C_{ei}\right) / \left(L\,10^{6}\right)$$ where:

E=emission rate of total organic compounds, mg/liter of gasoline loaded.
V_{esi}=volume of air-vapor mixture exhausted at each interval "i", scm.
C_{ei}=concentration of total organic compounds at each interval "i", ppm.
L=total volume of gasoline loaded, liters.
n=number of testing intervals.
i=emission testing interval of 5 minutes.
K=density of calibration gas, 1.83×106 for propane and 2.41×106 for butane, mg/scm.

d. The performance test shall be conducted in intervals of 5 minutes. For each interval "i", readings from each measurement shall be recorded, and the volume exhausted (V_{esi}) and the corresponding average total organic compounds concentration (C_{ei}) shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.

e. The following methods shall be used to determine the volume (V_{esi}) air-vapor mixture exhausted at each interval:

i. Method 2B shall be used for combustion vapor processing systems.

ii. Method 2A shall be used for all other vapor processing systems.

f. Method 25A or 25B shall be used for determining the total organic compounds concentration (C_{ei}) at each interval. The calibration gas shall be either propane or butane. The Permittee may exclude the methane and ethane content in the exhaust vent by any method (e.g., Method 18) approved by the control officer.

g. To determine the volume (L) of gasoline dispensed during the performance test period at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or readings from gasoline dispensing meters at each loading rack shall be used.

4. The Permittee shall determine compliance with II.D.2.g as follows: [40 CFR 60.503(d)]

a. A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with ±2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.

b. During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test.

B. Facility-Wide Operations

Should the Permittee be required by the Control Officer to test to determine compliance with any applicable standard, the Control Officer shall make a written request with the appropriate test methods. [PCC 17.20.010]

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ATTACHMENT C: APPLICABLE REGULATIONS

Requirements Specifically Identified as Applicable:

Code of Federal Regulations Title 40, Chapter 60 (40 CFR 60)

Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984.
Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.
Subpart XX	Standards of Performance for Bulk Gasoline Terminals.
Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

Code of Federal Regulations Title 40, Chapter 64 (40 CFR 64) – Compliance Assurance Monitoring

Pima County State Implementation Plan (SIP):

SIP 314	Petroleum Liquids.

Pima County Code (PCC) Title 17, Chapter 17.16:

17.16.020	Noncompliance with Applicable Standards.
17.16.030	Odor Limiting Standards.
17.16.230	Standards of Performance for Storage Vessels for Petroleum Liquids.
17.16.400	Organic Solvents and Other Organic Materials.
17.16.430	Standards of Performance for Unclassified Sources.
17.16.520	Standards of Performance for Storage Vessels for Petroleum Liquids

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ATTACHMENT D: EQUIPMENT LIST

Table I. Storage Vessels Subject to 40 CFR 60 Subpart Ka

Tank ID	Product*	Roof	Closure Device Used	Capacity (Gal)	Comment	Date
T-20	**Gasoline, Diesel, Jet Fuel, Ethanol**	Internal Floating	Primary Seal – Mechanical Shoe	**1,260,000**		1959 **Mod: 1979**

* All Tanks that store Gasoline may also be used to store Transmix.

Table II-A Storage Vessels Subject to 40 CFR 60 Subpart Kb

Tank ID	Product*	Roof	Closure Device Used	Capacity (Gal)	Comment	Date
T-23	**Gasoline, Diesel, Jet Fuel**, Ethanol	Internal Floating	Primary Seal – Mechanical Shoe Secondary Seal – Compression Plate w/ wiper	**840,000**		**1992**
T-25	**Gasoline, Diesel, Jet Fuel**, Ethanol	Internal Floating	Primary Seal – Mechanical Shoe Secondary Seal – Compression Plate w/ wiper	**2,100,000**	Breakout Tank	**1997**
T-26	**Gasoline, Diesel, Jet Fuel**, Ethanol	Internal Floating	Primary Seal – Mechanical Shoe Secondary Seal – Compression Plate w/ wiper	**2,832,690**		**1999**
T-34	**Gasoline, Diesel, Jet Fuel**, Ethanol	Internal Floating	Primary Seal – Mechanical Shoe Secondary Seal –Wiper w/ Apron	**2,814,000**		**2000**

* All Tanks that store Gasoline may also be used to store Transmix.

Table II-B Alternate Operating Scenario Storage Vessels Subject to 40 CFR 60 Subpart Kb

Tank ID	Product*	Roof	Closure Device Used	Capacity (Gal)	Comment	Date
T-35	**Gasoline, Diesel Jet Fuel,** Ethanol	Internal Floating	Primary Seal – Mechanical Shoe Secondary Seal – Rim Mounted	**2,520,000**	Breakout Tank	To be Supplied upon installation

T-36	**Gasoline, Diesel Jet Fuel,** Ethanol	Internal Floating	Primary Seal – Mechanical Shoe Secondary Seal – Rim Mounted	**2,520,000**	Breakout Tank	To be Supplied upon installation
T-37	**Gasoline, Diesel Jet Fuel,** Ethanol	Internal Floating	Primary Seal – Mechanical Shoe Secondary Seal – Rim Mounted	**2,520,000**	Breakout Tank	To be Supplied upon installation

* All Tanks that store Gasoline may also be used to store Transmix.

Table III. Storage Vessels Not Subject to 40 CFR 60 Subpart Ka or Kb

Tank ID	Product*	Roof	Vapor Pressure (psi)	Capacity (Gal)	Comment	Date
T-1	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	840,000		1955
T-2	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	701,904		1955
T-3	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	714,000		1955
T-4	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	714,000		1955
T-5	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	714,000		1956
T-6	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	2,100,000	Breakout Tank	1957
T-7	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	2,100,000	Breakout Tank	1957
T-8	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	2,100,000	Breakout Tank	1958
T-9	Jet Fuel, Diesel	Fixed – Cone	<1.5	651,000		1961
T-10	Jet Fuel, Diesel	Fixed – Cone	<1.5	420,000		1956
T-11	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	420,000		1956
T-12	Jet Fuel, Diesel	Fixed - cone	<1.5	337,092		1953
T-13	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	420,000		1956
T-14	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	845,040	Breakout Tank	1958
T-15	Gasoline, Diesel, Jet Fuel, Ethanol	Internal Floating	>1.5	845,040		1960
T-16	Gasoline, Diesel, Jet Fuel, Ethanol	Internal Floating	>1.5	2,520,000		1970

Tank ID	Product*	Roof	Vapor Pressure (psi)	Capacity (Gal)	Comment	Date
T-17	Gasoline, Diesel, Jet Fuel, Ethanol	External Floating	>1.5	1,680,000		1959
T-18	Gasoline, Diesel, Jet Fuel Ethanol	Internal Floating	>1.5	268,800		1965
T-19	Gasoline, Diesel, Jet Fuel	External Floating	>1.5	1,260,000		1959
T-21	Gasoline, Diesel, Jet Fuel, Ethanol	Internal Floating	>1.5	126,000		1955
T-22	Additives	Fixed – Cone	<1.5		Out of Service	<1970
T-27	Jet Fuel, Diesel	Fixed -Cone	<1.5	615,594		1955
T-28	Gasoline, Diesel, Jet Fuel, Ethanol	Internal Floating – Geodesic Dome	>1.5	1,008,000		1955
T-29	Gasoline, Diesel, Jet Fuel, Ethanol	Internal Floating	>1.5	619,584		1967
T-30	Gasoline, Diesel, Jet Fuel, Ethanol	Internal Floating	>1.5	603,414		1967
T-31	Jet Fuel, Non-regulated liquids	Horizontal		50,000	Out of Service	1993
T-32	Jet Fuel, Non-regulated liquids	Horizontal		50,000	Out of Service	1993
T-33	Gasoline, Diesel, Jet Fuel, Ethanol	Internal Floating – Geodesic Dome	>1.5	1,390,200		1955

* All Tanks that store Gasoline may also be used to store Transmix.

Table IV. Loading Racks Subject to 40 CFR 60 Subpart XX

Rack ID	Description	Control Device	Date
LR-1	2 bays, 9 bottom-loading arms.	NAO Thermal Oxidizer	**<1980**
LR-2	2 bays, 6 bottom-loading arms.	NAO Thermal Oxidizer	**1989**
LR-3W	1 bay, 4 bottom-loading arms.	NAO Thermal Oxidizer	**1999**
LR-4	2 bays, 10 bottom-loading arms.	John Zink Carbon Adsorption Unit	**1984**

Table V. Existing Pollution Control Equipment

Description	Model Number	Serial/ ID Number	Date Installed
NAO Thermal Oxidizer	AA-609-7-5	60C36NVCV	Dec 1988
John Zink Adsorption/ Absorption Vapor Recovery System	AAT-609-7-8	S67103	March 1989

Table VI. Pollution Control Equipment to be installed during Alternate Operating Scenario

Description	Model Number	Serial/ ID Number	Date Installed
John Zink Thermal Oxidizer	To be Supplied Upon Installation	To be Supplied Upon Installation	To be Supplied Upon Installation

Table VIII. Other Equipment

Description
Oil Water Separator OWS-1
Oil Water Separator OWS-2
Oil Water Separator OWS-3
Prover Drainage Sump
Ethanol offloading Pump Sleeve at LR-2 and LR-4 loading rack

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ATTACHMENT E: INSIGNIFICANT ACTIVITIES

I. Fuel additive tanks that store vapor pressure fuel additives: TA-510, TA-530, TA-540, TA-550, TA-560, TA-580, TA-670, AIA-1 & AIA-2.

II Diesel Lubricity Additive Storage Tank capacity 4000 gallons: TA-590

III. Contact water storage tanks: TS-OWS, TC-OWS, TU-OWS.

IV. Water collection sumps.

V. Laboratory activities.

VI. Routine minor repair of painting of facility equipment that does not constitute application of architectural coatings.

VII. Earth-moving activities that are of sufficiently small extent as not to require an activity permit.

VIII. Internal combustion engine-driven compressors, generator sets, water pumps, for emergency replacement, facility maintenance, or standby service.

IX. Sample Shelter activities

X. Sump operation

XI. Maintenance activities including replace loading arms

XII. Sampling of tanks

XIII. Preparation for a source test (installing flow meter)

XIV. Loading rack calibration

XV. Off-road utility vehicles

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ATTACHMENT F: ALTERNATE OPERATING SCENARIO

I. APPLICABILITY – 40 CFR 60 Subpart Kb and IIII

This alternate operating scenario (AOS) shall only apply to the facility equipment changes at the Tucson Terminal that will be part of expanding the capacity of SFPP, L.P.'s (SFPP) El Paso to Phoenix pipeline, also referred to as the EPX project. The Permittee shall notify the Control Officer within 10 calendar days of beginning construction for the AOS and within 10 calendar days of completing the AOS construction activities.

II. GENERAL PROVISIONS

The following requirements apply to the operation, maintenance, recordkeeping, testing of the breakout tanks, fire pump and associated monitoring systems in accordance with 40 CFR Part 60, Subpart A – General Provisions. These requirements are in addition to any applicable requirements in the General Provisions in Part A of this permit, unless Attachment F is more stringent.

A. Mailing Address

All requests, reports, applications, submittals, and other communications to the Administrator and Control Officer pursuant to 40 CFR Part 60 shall be submitted in duplicate to the Administrator and Control Officer at the following addresses: [40 CFR §60.4(a)]

Director, Air Division	Director
U.S. Environmental Protection Agency	Pima County Department of Environmental Quality
75 Hawthorne Street	150 W. Congress Street.
San Francisco, CA 94105	Tucson, AZ 85701

B. Notification and Recordkeeping **[Federally Enforceable Conditions]**

1. The Permittee shall, for the breakout tanks and its associated monitoring systems, furnish the Control Officer written notification as follows: [40 CFR 60.7(a)]

   a. A notification of the date construction is commenced postmarked no later than 30 days after such date (date of construction). [40 CFR 60.7(a)(1)]

   b. A notification of the actual date of initial startup postmarked within 15 days after such date (date of initial startup). [40 CFR 60.7(a)(3)]

   c. A notification of any physical or operational change which may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart or in 40 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Control Officer may request additional relevant information subsequent to this notice. [40 CFR 60.7(a)(4)]

2. The Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. [40 CFR 60.7(b)]

3. The Permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports, and records, except as follows: [40 CFR 60.7(f)]

   The Administrator or Control Officer, upon notification to the source, may require the Permittee to maintain all measurements as required by II.B.5 of Attachment G, if the Administrator or Control Officer determines these records are required to more accurately assess the compliance status of the affected source. [40 CFR 60.7(f)(3)]

C. Performance Tests

Within 60 days after achieving the maximum production rate at which the breakout tanks and associated monitoring systems will be operated, but not later than 180 days after initial startup of the breakout tanks, and at such other times as may be required by the Control Officer under section 114 of the Act, the Permittee shall conduct emissions performance test(s) on the exhaust stack of the John Zink thermal oxidizer to demonstrate compliance with emission limits specified in Condition II.D.2.b of Part B of this permit and furnish the Control Officer a written report of the results of such performance test(s). [40 CFR 60.8(a)]

D. Compliance with Standards and Maintenance Requirements (Breakout tanks and Fire pump engine)

1. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the equipment including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Control Officer which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [40 CFR 60.11(d)]

2. For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any standard in 40 CFR Part 60, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 60.11(g)]

E. Circumvention (NSPS Breakout tanks and Fire pump engine)

The Permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission, which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with opacity standard or with a standard, which is based on the concentration of a pollutant in the gases discharged to the atmosphere. [40 CFR 60.12]

F. General Notification and Reporting Requirements (NSPS Breakout tanks and Fire pump engine)

The Permittee shall comply with the "General Notification and Reporting Requirements" found in 40 CFR 60.19. [40 CFR 60.19]

III SPECIFIC CONDITIONS

A. Emission Limitations/Standards [PCC 17.12.180.A.2]

[Federally Enforceable & Material Permit Conditions]

1. NSPS Fire Pump Engine

a. The Permittee must comply with the emission standards below for the fire pump engine with a displacement of less than 30 liters per cylinder listed in Table VI of Attachment D: [40 CFR 60.4205(c)]

Pollutant	NHMC + NOx	CO	PM
Emission Limit (gm/hp-hr)	7.8	2.6	0.40

b. Beginning model year 2009, the manufacturer of the fire pump engine must certify that the engine meets the emission standards in permit condition II.A.1.a for each pollutant. [40 CFR 60.4202(d)]

2. NSPS Storage Vessels (subject to 40 CFR 60 Subpart Kb)

For the equipment listed in Table II-B of Attachment D, the Permittee shall meet all the 40 CFR 60 Subpart Kb emission limits/ standards if any that are identified in Part B of this permit.

B. Operational Limitations (NSPS fire pump engine) [PCC 17.12.180.A.2]

[Federally Enforceable & Material Permit Conditions]

1. The Permittee must operate and maintain the fire pump engine according to the manufacturer's written instructions or procedures developed by the Permittee that are approved by the engine manufacturer over the entire life of the engine. [40 CFR 60.4206]

2. The Permittee must meet the following fuel requirements for the fire-water Pump Engine:

i. Beginning October 1, 2007, the Permittee must use diesel fuel that meets the requirements of 40 CFR 80.510(a). [40 CFR 60.4207(a)]

ii. Beginning October 1, 2010, the Permittee must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. [40 CFR 60.4207(b)]

3. The Permittee may operate the fire pump engine for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. There is no time limit on the use of the emergency fire pump engine in emergency situations. The Permittee may petition the Administrator for approval of additional hours to be used for

maintenance checks and readiness testing. Any operation other than emergency operation, and maintenance and testing as permitted in this permit, is prohibited. [40 CFR 60.4211(e)]

C. Air Pollution Controls (NSPS breakout tanks)

[Federally Enforceable & Material Permit Condition]

Thermal Oxidizer

The Permittee shall capture and route all hydrocarbon emissions from the refloating of the internal roofs for the breakout tanks in Table II-B of Attachment D to the thermal oxidizer for destruction. [PCC 17.12.190.B]

D. Monitoring Requirements [PCC 17.12.180.A.3]

[Federally Enforceable & Material Permit Conditions]

1. NSPS Fire Pump Engine

The Permittee must install a non-resettable hour meter on the engine prior to startup of the fire pump engine. [40 CFR 60.4209(a)]

[Material Permit Condition]

2. NSPS Storage Vessels (subject to 40 CFR 60 Subpart Kb)

For the equipment listed in Table II-B of Attachment D, the Permittee shall meet all the 40 CFR 60 Subpart Kb monitoring requirements if any that are identified in Part B of this permit.

E. Recordkeeping Requirements [PCC 17.12.180.A.4]

1. NSPS Fire Pump Engine

a. The Permittee shall keep onsite a record of the manufacturer's written instructions or procedures developed by the Permittee that are approved by the engine manufacturer.

[Federally Enforceable & Material Permit Condition]

b. All records required by this permit (including records of monitoring) shall be maintained on-site for at least five years. [PCC 17.12.180.A.4.b]

[Locally Enforceable Condition]

2. NSPS Storage Vessels (subject to 40 CFR 60 Subpart Kb)

[Federally Enforceable & Material Permit Conditions]

a. For the equipment listed in Table II-B of Attachment D, the Permittee shall meet all the 40 CFR 60 Subpart Kb recordkeeping requirements, if any, that are identified in Part B of this permit.

b. The Permittee shall keep copies of all records required by III.F.2.a.i of Attachment F for at least 2 years. [40 CFR 60.115b]

F. Reporting Requirements [PCC 17.12.180.A.5]

[Federally Enforceable & Material Permit Conditions]

1. NSPS Fire Pump Engine

   a. The Permittee is not required to submit any initial notifications. [40 CFR 60.4214(b)]

   b. The Permittee shall follow the notification requirements in VI.C, D and E of Part B and any applicable notification requirements in Part A of this permit.

2. NSPS Storage Vessels (subject to 40 CFR 60 Subpart Kb)

   a. For the equipment listed in Table II-B of Attachment D, in addition to the requirement identified below, the Permittee shall meet all the 40 CFR 60 Subpart Kb reporting requirements, if any, that are identified in Part B of this permit.

   b. After installing control equipment in accordance with II.B.1 of Part B (fixed roof and internal floating roof), the Permittee shall furnish the Control Officer with a report that describes the control equipment and certifies that the control equipment meets the specifications of II.B.1 of Part B and III.G.2.a.i.(A) of Attachment F. This report shall be an attachment to the notification required by II.B.1.b of Attachment F. [40 CFR 60.115b(a)(1)]

G. Testing Requirements for NSPS Storage Vessels (subject to 40 CFR 60 Subpart Kb) [PCC 17.12.180.A.3]

[Federally Enforceable & Material Permit Conditions]

1. For the equipment listed in Table II-B of Attachment D, in addition to the requirements identified below, the Permittee shall meet all the 40 CFR 60 Subpart Kb testing requirements if any that are identified in Part B of this permit.

   a. After installing control equipment in accordance with II.B.1 of Part B (fixed roof and internal floating roof), the Permittee shall: [40 CFR 60.113b(a)]

      i. Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel. [40 CFR 60.113b(a)(1)]

      ii For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Control Officer in the inspection report required in VI.A.2 of Part B. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible. [40 CFR 60.113b(a)(2)]