

AIR QUALITY
MANAGEMENT DISTRICT**STATEMENT OF BASIS FOR
3rd RENEWAL OF TITLE V FEDERAL OPERATING PERMIT**

Application No.:	<u>TV2012-04-02A</u>
Date:	<u>September 5, 2018</u>
Reviewing Engineer:	<u>Isam Boulad</u>

A. FACILITY INFORMATION

<u>FACILITY NAME:</u>	SFPP, L.P. Bradshaw Terminal
<u>LOCATION:</u>	2901 Bradshaw Road Sacramento, CA 95827
<u>MAILING ADDRESS:</u>	1100 Town and Country Road Orange, CA 92868
<u>RESPONSIBLE OFFICIAL:</u>	D. Scott Manley Director of Operations (707) 438-2100
<u>CONTACT PERSON:</u>	Clay Westlake Area Manager (916) 369-9770

B. PURPOSE OF THIS STATEMENT OF BASIS

The Title V Federal Operating Permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes that make the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose of this Statement of Basis is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This statement of Basis will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this Statement of Basis, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

C. TITLE V PERMIT HISTORY

This Statement of Basis is for the third renewal of the current Title V Federal Operating Permit No. TV2007-04-01 to be issued to the SFPP, L.P. Bradshaw Terminal. This action will also incorporate the Minor Modification (TV2007-04-02) to replace the existing mechanical shoe primary seal with a rim-mounted steel compression plate secondary seal on Tank B-4 (P/O 20175) with a new mechanical shoe primary seal with a rim-mounted steel compression plate secondary seal. The new replacement seals are the same type and design. The maximum capacity of the storage tank will remain the same before and after the seal replacement. In addition, this action will also incorporate the 2nd Minor Modification to the 3rd Renewal Permit (TV2012-04-02) to add a parts washer to the Exempt Source List, under Rule 201, Section 118.3. The parts washer is an enclosed, 40 gallon tub utilizing a solvent with a boiling point above 221 °F. It is therefore exempt under Rule 201-118.3 and Rule 441-202.

Furthermore, five Administrative Amendments have also been received for changes to the Responsible Official and the Plant Site Contact person listed under the Title V permit (TV2007-04-02A, TV2012-04-01A, TV2012-04-01B, TV2012-04-01C, and TV2012-04-02A). These will also be incorporated into this permit renewal.

The following permit actions have occurred since the initial Title V Federal Operating Permit No. TV1996-04-01 was issued:

Permit Action	Date	Permit No.
Initial Title V Federal Operating Permit issued. 1st Minor Modification.	06-18-1998 10-26-1999	TV1996-04-01 TV1996-04-02
1st Permit Renewal. 1st Minor Modification. 2nd Minor Modification.	01-07-2003 07-11-2005 06-11-2007	TV2002-04-01 TV2002-04-02 TV2002-06-03
2nd Permit Renewal 1st Minor Modification. 1st Administrative Amendment.	01-07-2008 07-02-2009 12-13-2010	TV2007-04-01 TV2007-04-02 TV2007-04-02A
3rd Permit Renewal 1st Administrative Amendment. 2nd Administrative Amendment. 3rd Administrative Amendment. 1st Minor Modification. 4th Administrative Amendment. 2nd Minor Modification.	01-07-2012 07-02-2012 11-21-2013 09-21-2015 10-02-2015 05-02-2017 09-20-2017	TV2012-04-01 TV2012-04-01A TV2012-04-01B TV2012-04-01C TV2012-04-02 TV2012-04-02A TV2012-04-03

- This permit action was for a temporary permit that is now cancelled.

D. FACILITY DESCRIPTION

SFPP, L.P. (SFPP), Bradshaw Terminal was constructed and placed into service in 1957. Bradshaw Terminal receives refined fuels via SFPP's 10" pipeline. These fuels are held temporarily in storage tanks and then loaded into tank trucks to resupply surrounding retail gas stations and public/private businesses. Additional product can be transferred by 4" pipeline to the property that was formally Mather Air Force Base but is now a non-military airport. The petroleum products stored and dispensed at Bradshaw Terminal are not owned by SFPP. SFPP only stores and provides tank truck loading equipment for the amount of petroleum products requested by the companies that use its services.

The primary air pollutant emissions from the Bradshaw Terminal are volatile organic compounds (VOCs) from the evaporation of gasoline. The main sources of these emissions, all characterized as fugitive emissions, are the storage tanks, loading racks, thermal oxidizer and pipe connectors and fittings.

The gasoline storage tanks are equipped with either floating roofs with rim seals or fixed roofs with floating pans and rim seals to reduce the evaporation of gasoline and therefore reduce VOC emissions.

During tank truck loading, the displaced gasoline vapors (VOCs) are captured and conveyed through vapor piping to the terminal's vapor processing system where the vapors are finally destroyed in the thermal oxidizer unit.

With the phase out of MTBE as a gasoline additive, the Bradshaw Terminal now receives denatured ethanol with a tank truck ethanol unloading system.

E. INSIGNIFICANT EMISSIONS UNIT INFORMATION

Equipment Description	Basis for Determination of Insignificant Emissions Unit per SMAQMD “List and Criteria”, Part B, Section 5 modified April 2001.
Vehicles	1. Not subject to a preconstruction permit.
Equipment powered by a small IC engine such as lawn mower, weed eater, chainsaw, pump, high pressure washer, foam trailer, etc.	2. Combustion equipment with maximum heat input ≤ 5,000,000 BTU/hour and exclusively fired with natural gas or LPG (propane)
Small combustion equipment fueled by natural gas or liquefied petroleum gas such as propane starter	3. Piston-type internal combustion engine with rating ≤ 50 bhp
Refrigeration Units	4. Any refrigeration unit provided the unit: a. Contains less than 50 pounds of refrigerant; and b. Is not used in conjunction with air pollution control equipment
Storage Containers, Reservoirs, and Tanks - Liquefied Gases	5. Any equipment used exclusively for the storage of liquefied gases in unvented (except for emergency pressure-relief valves) pressure vessels.
Storage Tank No.A-3	6. Any equipment used exclusively for the storage of unheated organic material with: a. An initial boiling point of 150° C [302° F] or greater as determined by ASTM test method 1078-86); or b. A vapor pressure of no more than five millimeters mercury (mmHg) [0.1 pound per square inch (psi) absolute] as determined by ASTM test method D-2879-86.
Storage Tank No.A-5	
Storage Tank No.B-6	
Storage Tank No.B-7	
Storage Tank No.B-12	
Storage Tank No.B-13	
Storage Tank No.B-16	
Storage Tank No.B-17	
Storage Tank No.A-6	
Storage Tank No.A-7	7. Any equipment with a capacity of no more than 250 gallons used exclusively for the storage of unheated organic liquid. 8. Any equipment with a capacity of no more than 6,077 gallons used exclusively for the underground storage of unheated organic liquid with a vapor pressure no more than 75 mm Hg (1.5 psi absolute) as determined by ASTM test method D-2879-86.

E. INSIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

Equipment Description	Basis for Determination of Insignificant Emissions Unit per SMAQMD “List and Criteria”, Part B, Section 5 modified April 2001.
Laboratory Fume Hoods and Vents	9. Any laboratory fume hood or vent, provided such equipment is used exclusively for the purpose of teaching, research, or quality control.
General Repairs and Maintenance	10. Not subject to a source-specific requirement of a State Implementation Plan
Sumps	and
Oil water separators	Emits no more than 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than two tons per year of a regulated pollutant that is not a HAP
Propane tank --- repeated	11. Any equipment used exclusively for the storage of liquefied gases in unvented (except for emergency pressure-relief valves) pressure vessels.

F. SIGNIFICANT EMISSIONS UNIT INFORMATION

1. STORAGE TANKS:

Storage Tank No.	Roof type/seal type	Diameter feet	Height feet	Safe Working Capacity gallons	Contents	Subject to NSPS Subpart Kb	Subject to NESHAP Subpart BBBBBB	SMAQMD Permit No. (C)
B-1	External/mechanical shoe and rim mounted wiper	100	40	1,985,424	Organic liquid OR Gasoline	No (A)	Yes (B)	1387
B-2	External/mechanical shoe and rim mounted wiper	100	40	1,985,298	Organic liquid OR Gasoline	No (A)	Yes (B)	1388
B-3	External/mechanical shoe and rim mounted wiper	100	40	1,978,326	Organic liquid OR Gasoline	No (A)	Yes (B)	1389
B-4	External/mechanical shoe and rim mounted wiper	100	40	1,986,390	Organic liquid OR Gasoline	No (A)	Yes (B)	20715
B-5	External/mechanical shoe and rim mounted wiper	52	40	630,000	Organic liquid OR Gasoline	No (A)	Yes (B)	14110
B-8	External/mechanical shoe and rim mounted wiper	73.3	40	1,079,862	Organic liquid OR Gasoline	No (A)	Yes (B)	11845
B-9	Internal/mechanical shoe and rim mounted wiper	30	40	193,284	Organic liquid OR Gasoline OR transmix	No (A)	Yes (B) (D)	16600
B-10	Internal/mechanical shoe and liquid mounted resilient	76.5	48	1,515,318	Organic liquid OR Gasoline	No (A)	Yes (B)	1394
B-11	Internal/mechanical shoe and rim mounted wiper	68.5	48	1,216,992	Organic liquid OR Gasoline	No (A)	Yes (B)	18608
B-14	Internal/metallic shoe and rim mounted wiper	56	48	809,802	Organic liquid OR Gasoline OR Ethanol	No (A)	Yes (B) (D)	19645
B-15	Internal/metallic shoe and rim mounted wiper	56	48	808,710	Organic liquid OR Gasoline OR Ethanol	No (A)	Yes (B) (D)	18051

(A) The tank was constructed prior to May 18, 1978, and was not modified or reconstructed after the initial installation, therefore, it is not subject to Subpart Ka or Kb. The modification of the tank that occurred in 1998 did not result in an increase in emissions, thus, it is not a modification as defined in 40 CFR Part 60 §60.2.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS General Requirements (continued)
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- (B) NESHAP Subpart BBBB is applicable if the tank contains gasoline.
- (C) For reference purposes only - not federally enforceable.
- (D) U.S. EPA's Federal Register notice of January 24, 2011 (76 FR 4156; pp. 4173-4174) clarified that "denatured ethanol" and "transmix" are not "gasoline" as defined in 40 CFR 63 Subpart BBBB § 63.11100.

2. LOADING RACKS

Loading Rack No. 1

P/O No.: 17654 (for reference purposes only - not federally enforceable)

Loading rack consisting of:

- A. Gasoline loading spots with 4 pumps (2).
- B. Diesel loading spots with 2 pumps (2).
- C. Equipment for blending of other organic liquids with a true vapor pressure not to exceed 11 psia.
- D. Vapor recovery piping vented to APC refrigeration-thermal oxidizer vapor processing system.

Loading Rack No. 2

P/O No.: 17655 (for reference purposes only - not federally enforceable)

Loading rack consisting of:

- A. Gasoline loading spots with 3 pumps (2).
- B. Diesel loading spots with 1 pump (2).
- C. Transmix loading spot with 1 pump.
- D. Equipment for blending of other organic liquids with a true vapor pressure not to exceed 11 psia.
- E. Vapor recovery piping vented to APC refrigeration-thermal oxidizer vapor processing system.

Loading Rack No. 3

P/O No.: 17669 (for reference purposes only - not federally enforceable)

Loading rack consisting of:

- A. Gasoline loading spots with 2 pumps (2).
- B. Diesel loading spots with 2 pumps (2).
- C. Jet A loading spot with 1 pump.
- D. Equipment for blending of other organic liquids with a true vapor pressure not to exceed 11 psia.
- E. Vapor recovery piping vented to APC refrigeration-thermal oxidizer vapor processing system.

3. VAPOR PROCESSING SYSTEM

APC Tank Truck Loading Vapor Collection-Refrigeration-Thermal Oxidizer System

P/O No.: 20420 (for reference purposes only - not federally enforceable)

Consisting of:

- A. Vapor Collection System (used in Normal, Bypass and Direct Modes)
Venting: Tank truck loading at Loading Rack Nos. 1, 2 and 3

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS General Requirements (continued)
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- B. Vapor Holding Tank (used in Normal and Bypass Modes)
Capacity: 40,000 cubic feet of displaced vapor
- C. Vapor Condensing Unit (used in Normal Mode):
Manufacturer: Edwards
Model No.: DEC-3600
Type: Refrigeration
Capacity: 800 cubic feet of displaced vapor/minute
- D. Thermal Oxidizer (used in Normal, Bypass and Direct Modes)
Manufacturer: John Zink
Model No.: S76300
Type: Thermal oxidizer
Capacity: 800 cubic feet of displaced vapor/minute

4. TANK TRUCK UNLOADING SYSTEM

P/O No.: 22882 (for reference purposes only - not federally enforceable)

Consisting of:

- A. Flexible unloading hose, 4 inch diameter (1).
- B. Pump sleeve (1).
- C. Submerged pump to transfer product to storage tank (1).
- D. Vapor return line.

5. ETHANOL HANDLING SYSTEM

The Ethanol Handling System allows ethanol to be received by tank truck, transferred to Storage Tank No. B-14 and then transferred to the loading rack for blending with gasoline. The ethanol is a clean air gasoline additive to be used in place of MTBE because MTBE was phased out by January 1, 2004 for water quality concerns. MTBE was previously blended into gasoline at the refinery and there was no need for an MTBE handling system at the bulk terminal. The ethanol is not blended into gasoline at the refinery therefore the Ethanol Handling System is needed at the bulk terminal. The ethanol is blended with gasoline at the loading rack during the tank truck loading process. The Ethanol Handling System is part of Tank No. B-14 which is described in the Storage Tanks Table above and it consists of:

SMAQMD Permit to Operate No. 19645 (for reference purposes only - not federally enforceable)

- A. Unloading hoses and associated piping (2).
- B. Unloading sleeves (4).

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
General Requirements (continued)

G. ALTERNATE OPERATING SCENARIOS

None requested.

Estimated Actual Emissions (tons per year) (A)							
Equipment	VOC	NOx	PM10	SOx	CO	Single HAP (B)	Total HAPs (B)
Storage Tank No. B-1	1.969	N/A	N/A	N/A	N/A	1.24	1.24
Storage Tank No. B-2	2.101	N/A	N/A	N/A	N/A		
Storage Tank No. B-3	0.042	N/A	N/A	N/A	N/A		
Storage Tank No. B-4	0.048	N/A	N/A	N/A	N/A		
Storage Tank No. B-5	1.588	N/A	N/A	N/A	N/A		
Storage Tank No. B-6 (C)	1.470	N/A	N/A	N/A	N/A		
Storage Tank No. B-7 (C)	1.350	N/A	N/A	N/A	N/A		
Storage Tank No. B-8	2.382	N/A	N/A	N/A	N/A		
Storage Tank No. B-9	3.570	N/A	N/A	N/A	N/A		
Storage Tank No. B-10	1.330	N/A	N/A	N/A	N/A		
Storage Tank No. B-11	1.160	N/A	N/A	N/A	N/A		
Storage Tank No. B-12 (C)	1.360	N/A	N/A	N/A	N/A		
Storage Tank No. B-13 (C)	1.210	N/A	N/A	N/A	N/A		
Storage Tank No. B-14 and Ethanol Unloading	1.086	N/A	N/A	N/A	N/A		
Storage Tank No. B-15	0.066	N/A	N/A	N/A	N/A		
Storage Tank No. B-16 (C)	1.210	N/A	N/A	N/A	N/A		
Storage Tank No. B-17 (C)	1.020	N/A	N/A	N/A	N/A		
Loading Rack No. 1 Loading Rack No. 2 Loading Rack No. 3	9.351	N/A	N/A	N/A	N/A		
APC Vapor Processor	1.369	13.6 (D)	N/A	N/A	60.8 (D)		
Component Fugitive Losses (Tanker + ethanol + offloading)	1.738	N/A	N/A	N/A	N/A		
Tank Truck Unloading System	0.033	N/A	N/A	N/A	N/A		
APC Absorption/Carbon Adsorption Vapor Processing System	N/A	N/A	N/A	N/A	N/A		
Totals	35.5	13.6	-	-	60.8	1.24	1.24

(A) Except as noted, emissions are from SMAQMD 2011 Emission Inventory.

(B) HAP emission estimates from SMAQMD 2008 AB2588 Health Risk Assessment Report. As a worst case

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS General Requirements (continued)
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scenario, the total single HAP emission is equated to the total HAPs emissions.

- (C) VOC emissions are based on the storage of jet fuel (JP5) as a worst case scenario, even though the tanks may actually store diesel fuel. HAP emissions are based on the storage of diesel fuel as a worst case scenario, even though the tanks may actually store jet fuel. Emissions are based on U.S. EPA TANKS 4.09d computer program.
- (D) NOx and CO emissions are based on the maximum allowable emissions of 75 lbs/day and 334 lbs/day, respectively, 365 days/year.

SMAQMD Rule 101 - General Provisions and Definitions

SIP approved: 08-09-2012 (77 FR 47535)
10-27-2011 rule version is SIP approved

Rule Description: This rule provides definitions of terms, specifies authority to arrest and specifies what data is public information.

Compliance Status: The rule does not require the permit holder to take any actions.

SMAQMD Rule 102 - Circumvention

SIP approved: 12-05-1984 (49 FR 47490)
05-15-1973 rule version is SIP approved

Rule Description: This rule prohibits concealment of emissions and specifies how compliance determinations are made for combined and separated emissions.

Compliance Status: The permit holder is expected to comply with the rule requirements.

SMAQMD Rule 105 - Emission Statement

SIP Approved: 06-06-2008 (73 FR 32240)
09-05-1996 rule version is SIP approved

Rule Description: This rule requires the facility to provide annual emission data if the facility's VOC actual annual emissions are greater than 25 tons

Compliance Status: The permit holder has provided annual emission data as required and is in compliance.

SMAQMD Rule 201 - General Permit Requirements

SIP Approved: 07-13-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved
08-24-2006 rule version is the current version and is not SIP approved

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS General Requirements (continued)
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Rule Description: This rule provides an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits.

Compliance Status: The permit holder has active permits for all sources that require permits.

SMAQMD Rule 202 - New Source Review

SIP approved: SIP approval of 11-20-1984 rule version was withdrawn on 08-19-2011. *08-23-2012 rule version is the current version and is not SIP approved. This rule is not federally enforceable, but any permit conditions derived from this rule when it was SIP-approved, will remain federally enforceable.* SMAQMD Rule 214 Federal New Source Review is the new NSR rule applicable to new and modified major stationary sources and it is a SIP-approved rule (*SIP approved 09-29-2013*).

Rule Description: This rule sets the procedures for review of new and modified stationary sources and provides the mechanisms for evaluating the applicability of BACT and offset requirements.

Compliance Status: The permit holder's past and present permit actions have been in compliance with this rule.

SMAQMD Rule 203 – Prevention of Significant Deterioration

SIP Approved: 07-20-2011 (76 FR 43183)
01-27-2011 rule version is SIP approved

Rule Description: This rule sets the procedures for review of the Prevention of Significant Deterioration (PSD) program which is a permitting program for new major facilities and major modifications at existing major facilities located in attainment areas.

Compliance Status: This is a recently adopted and SIP approved rule. The facility's equipment will be reviewed pursuant to this rule, if applicable, for all future permitting actions.

SMAQMD Rule 207 - Title V Federal Operating Permits

SIP Approved: 11-21-2003 (68 FR 65637) (as part of the Title V Federal Operating Permit program approval).
04-26-2001 rule version is SIP approved.

Rule Description: This rule sets forth the procedures for review, issuance and renewal of

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS General Requirements (continued)
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Title V operating permits.

Compliance Status: The permit holder has submitted a timely and complete Title V permit renewal application. The expiration date of the current Title V Operating Permit is therefore extended to the time that the SMAQMD makes a decision regarding approving the renewal of the Title V Operating Permit.

SMAQMD Rule 214 - Federal New Source Review

SIP Approved: 09-29-2013 (78 FR 53271)
08-23-2012 rule version is SIP approved

Rule Description: This rule sets the procedures for review of emissions units at new and modified major stationary sources and provides the mechanisms for evaluating the applicability of BACT and/or offset requirements.

Compliance Status: This is a recently adopted and SIP approved rule. The facility's equipment will be reviewed pursuant to this rule, if applicable, for all future permitting actions.

SMAQMD Rule 301 - Permit Fees (for Title V referenced fees only)

SIP approved: The rule is not SIP approved but the portions of the rule that reference Title V permit fees are applicable because they are part of the SMAQMD Title V Federal Operating Permit program approved by U.S. EPA on 11-21-2003 (68 FR 65637).

Rule Description: This rule requires Title V sources to pay specified fees.

Compliance Status: The permit holder has paid permit fees as required and is in compliance.

SMAQMD Rule 307 - Clean Air Act Fees

SIP approved: 08-26-2003 (68 FR 51184)
09-26-2002 rule version is SIP approved

Rule Description: This rule requires major sources of VOC and NO_x to pay specified fees beginning after the U.S. EPA determines that the SMAQMD has failed to demonstrate attainment of the one hour ozone ambient air quality standard by the attainment year.

Compliance Status: The owner/operator is expected to comply with the fee requirement.

SMAQMD Rule 401 - Ringelmann Chart

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS General Requirements (continued)
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SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: All of the permit holder's equipment is expected to comply with the visible emission requirement.

SMAQMD Rule 403 - Fugitive Dust

SIP Approved: 12-05-1984 (49 FR 47490)
08-03-1977 rule version is SIP approved

Rule Description: The rule regulates equipment and processes that may cause fugitive dust emissions into the atmosphere.

Compliance Status: The facility complies with this rule by taking the necessary precautions to ensure that fugitive dust is not airborne beyond the property line.

SMAQMD Rule 442 - Architectural Coatings

SIP Approved: 10-04-2016 (81 FR 68320)
09-24-2015 rule version is SIP approved

Rule Description: This rule limits the quantity of volatile organic compounds in architectural coatings supplied, sold, offered for sale, applied, solicited for application or manufactured for use within the District.

Compliance Status: The affected coatings used by the permit holder are received and stored in containers that display the required manufacturer's labels and demonstrate compliance with the rule's requirements.

SMAQMD Rule 466 - Solvent Cleaning

SIP approved: 09-29-2011 (76 FR 60376)
10-28-2010 rule version is SIP approved

Rule Description: This rule reduces the emissions of volatile organic compounds from solvent cleaning operations and activities, and from the storage and disposal of new and spent cleaning solvents.

Compliance Status: The affected architectural coating application equipment solvent cleaning materials used by the facility are received and stored in containers that

<p>I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS General Requirements (continued)</p>
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display the required manufacturer's labels and demonstrate compliance with the rule's requirements.

I. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
General Requirements (continued)

The following SMAQMD Rule 701 is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 701 - Emergency Episode Plan

SIP approved: 09-05-2000 (65 FR 53602):
05-27-1999 rule version is SIP approved

Rule Description: This rule shall apply to all stationary sources, or combination of stationary and mobile sources, which emit (based on actual emissions for the previous calendar year) 50 tons or more per year of volatile organic compounds, or 50 tons or more per year of oxides of nitrogen, or 100 tons or more per year of carbon monoxide, or 100 tons or more per year of PM10. This rule requires a plan be prepared for specific actions to be taken when health related levels of ozone, carbon monoxide or PM10 are exceeded.

Compliance Status: This rule is not applicable because the actual emissions from the facility are less than the applicability levels listed in the rule.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR Part 64 Compliance Assurance Monitoring (CAM)

Promulgated: 10-22-1997 (62 FR 54940)

Rule Description: This rule requires Title V sources to provide compliance assurance monitoring of emissions units that rely on a pollution control device to meet certain standards

Compliance Status: 40 CFR 64.2(b)(1) exempts certain emission limitations or standards from the CAM rule. The Loading Racks are exempt from the CAM rule under the following exemption listed in 40 CFR 64.2(b)(1):

- A. They are subject to a post 11/15/1990 NESHAP standard.
- B. The Part 70 permit specifies a continuous compliance determination method.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 1 - Storage Tank Nos. B-1, B-2, B-3, B-4, B-5, B-8, B-9, B-10, B-11, B-14, and B-15

SMAQMD Rule 446 - Storage of Petroleum Products

SIP approved: 09-16-1994 (59 FR 47544)

Rule Description: This rule sets the design specifications for storage tanks to minimize VOC emissions.

Compliance Status: Storage Tank Nos. B-1, B-2, B-3, B-4, B-5, and B-8
Each tank has a capacity in excess of 40,000 gallons. The use of an external floating roof with mechanical shoe seal and rim mounted wiper seal meets the requirements of this rule. Each tank could store gasoline, diesel fuel or jet kerosene fuel, all of which have a true vapor pressure of less than 11 psia under actual storage conditions.

Storage Tank No. B-14 and Ethanol Handling System

The tank has a capacity in excess of 40,000 gallons. The use of a fixed roof with an internal floating cover with a mechanical shoe seal meets the requirements of this rule. The tank could store gasoline, diesel fuel or jet kerosene fuel, all of which have a true vapor pressure of less than 11 psia under actual storage conditions.

Storage Tank Nos. B-9, B-11, and B-15

Each tank has a capacity in excess of 40,000 gallons. The use of a fixed roof with an internal floating cover with a metallic shoe seal meets the requirements of this rule. Each tank could store gasoline, diesel fuel or jet kerosene fuel, all of which have a true vapor pressure of less than 11 psia under actual storage conditions.

Storage Tank No. B-10

The tank has a capacity in excess of 40,000 gallons. The use of a fixed roof with an internal floating cover with a liquid mounted resilient toroid seal meets the requirements of this rule. The tank could store gasoline, diesel fuel or jet kerosene fuel, all of which have a true vapor pressure of less than 11 psia under actual storage conditions.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 1 - Storage Tank Nos. B-1, B-2, B-3, B-4, B-5, B-8, B-9, B-10, B-11, B-14, and B-15 (continued)

40 CFR 60 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 (begin at 40 CFR 60.110b):

Promulgated: 04-08-1987 (52 FR 11429)

Rule Description: This rule sets the design specifications for storage tanks to minimize VOC emissions.

Compliance Status: The tanks were constructed prior to July 23, 1984 and were not modified or reconstructed after the initial installation. Therefore, they are not subject to Subpart Ka or Kb.

40 CFR 63 Subpart BBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities (begin at 63.11080):

Promulgated: 01-10-2008 (73 FR 1933)

Rule Description: This rule sets the design specifications for gasoline bulk terminals to minimize HAP emissions.

Compliance Status: This rule is applicable to any tank when it contains gasoline and it is not applicable when the tank contains transmix, ethanol or any organic material that is not considered gasoline by definition. Transmix and denatured ethanol are not considered gasoline per U.S. EPA's Federal Register notice of January 24, 2011 (76 FR 4156, pp. 4173-4174).

Tanks B-1, B-2, B-3, B-4, B-5, and B-8 are equipped with an external floating roof. The tanks are operated and maintained in a manner consistent with the NESHAP requirements.

Tanks B-9, B-10, B-11, and B-14 are each equipped with an internal floating roof. The tanks are operated and maintained in a manner consistent with the NESHAP requirements.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 1 - Storage Tank Nos. B-1, B-2, B-3, B-4, B-5, B-8, B-9, B-10, B-11, B-14, and B-15 (continued)

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart R (begin at 63.420) National Emission Standards for Hazardous Air Pollutants – Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

Promulgated: 12-14-1994 (59 FR 64318)

Rule Description: This rule sets design and operating standards for bulk gasoline terminals and pipeline breakout stations.

Compliance Status: The permit holder has documented and recorded through emission calculations and through the facility's annual emission inventory reports that the facility is not a major source for HAP as defined in 40 CFR 63.2 – Definitions; therefore, per 40 CFR 63.420(a)(2), the permit holder is not subject to this rule. However, the permit holder will be subject to the provisions of this rule if the facility becomes a major source for HAP.

Permit Conditions - SMAQMD Rule 201 Permit to Operate Nos. 1387, 1388, 1389, 20715, 14110 and 11845

Condition Description: SMAQMD Permit to Operate Nos. 1387, 1388, 1389, 20715, 14110 and 11845 specify equipment requirements for seals and gaskets be maintained, that the tank comply with SMAQMD Rule 446, and require record keeping.

Condition No. 7, under specified circumstances, includes an exception to the requirement that the floating roof shall float on the liquid surface of the tank contents at all times. These circumstances occur when the tank is completely emptied and refilled for primary and secondary seal repair or replacement, or product change. SMAQMD Rule 446 Storage of Petroleum Products is silent on the requirements during these circumstances. The SMAQMD has added this condition to clarify the requirements during these circumstances.

[Condition Nos. 1, 2, 3 and 4 of the SMAQMD permit are not federally enforceable.]

Compliance Status: The storage tanks comply with the requirements of the permit conditions.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS

Equipment Specific Requirements

Section 1 - Storage Tank Nos. B-1, B-2, B-3, B-4, B-5, B-8, B-9, B-10, B-11, B-14, and B-15 (continued)

Permit Conditions - SMAQMD Rule 201 Permit to Operate No. 19645

Condition Description: SMAQMD Permit to Operate No. 19645 specifies equipment requirements for seals and gaskets be maintained, that the tank comply with SMAQMD Rule 446, and require record keeping.

Condition No. 4, under specified circumstances, includes an exception to the requirement that the floating roof shall float on the liquid surface of the tank contents at all times. These circumstances occur when the tank is completely emptied and refilled for primary and secondary seal repair or replacement, or product change. SMAQMD Rule 446 Storage of Petroleum Products is silent on the requirements during these circumstances. The SMAQMD has added this condition to clarify the requirements during these circumstances.

[Condition Nos. 1, 2, 3 and 4 of the SMAQMD permit are not federally enforceable.]

Compliance Status: The storage tank and ethanol unloading system comply with the requirements of the permit conditions.

Permit Conditions - SMAQMD Rule 201 Permit to Operate No. 1394, 16600, 18608 and 18051

Condition Description: SMAQMD Permit to Operate Nos. 1394, 16600, 18608 and 18051 specify equipment requirements for seals and gaskets be maintained, that the tank comply with SMAQMD Rule 446, and require record keeping.

Condition No. 4, under specified circumstances, includes an exception to the requirement that the floating roof shall float on the liquid surface of the tank contents at all times. These circumstances occur when the tank is completely emptied and refilled for primary and secondary seal repair or replacement, or product change. SMAQMD Rule 446 Storage of Petroleum Products is silent on the requirements during these circumstances. The SMAQMD has added this condition to clarify the requirements during these circumstances.

[Condition Nos. 1, 2, 3 and 4 of the SMAQMD permit are not federally enforceable.]

Compliance Status: The storage tanks comply with the requirements of the permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS Equipment Specific Requirements Loading Rack Nos. 1, 2 and 3
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SMAQMD Rule 447 - Organic Liquid Loading:

SIP approved: 11-26-1999 (64 FR 66393)

Rule Description: The purpose of this rule is to limit emissions from the loading of organic liquids. The requirements of this rule include maintaining the system leak free and vapor tight, scheduled maintenance requirements and an emission limitation of 0.08 lb VOC/1,000 gallons of organic liquids loaded.

Compliance Status: The loading of gasoline into tank trucks at the SFPP Bradshaw Terminal complies with the requirements of this rule.

40 CFR 63 Subpart BBBBBB National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

Rule Description: This rule sets the design specifications for gasoline bulk terminals to minimize HAP emissions.

Compliance Status: Emissions from the loading rack are controlled by a closed vent system with a control device designed to reduce emissions of total organic HAP by 95 weight-percent. The loading rack is operated and maintained in a manner consistent with the NESHAP requirements.

40 CFR 60 Subpart XX - Standards of Performance for Bulk Terminals (begin at 40 CFR 60.500):

Promulgated: 08-18-1983 (48 FR 37590)

Rule Description: The purpose of this federal regulation is to limit emissions from the loading of gasoline at bulk gasoline terminals. The requirements of this federal regulation include maintaining the system leak free and vapor tight, recordkeeping and an emission limitation of 35 mg TOC/liter of gasoline loaded.

Compliance Status: The loading of gasoline into tank trucks at the SFPP, L.P. Bradshaw Terminal complies with the requirements of this rule.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Loading Rack Nos. 1, 2 and 3 (continued)

Permit Conditions - SMAQMD Rule 201 Permit to Operate Nos. 17654, 17655, and 17669

Condition Description: SMAQMD Permit to Operate Nos. 17654, 17655, and 17669 for the loading racks limit VOC emissions and throughput, require the equipment be maintained to be leak free and vapor tight, require annual emission testing and require recordkeeping and reporting.

[Condition Nos. 1, 2, 3 and 4 of the SMAQMD permit are not federally enforceable.]

Compliance Status: The loading racks comply with the requirements of the permit conditions.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart R (begin at 63.420) National Emission Standards for Hazardous Air Pollutants – Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

Promulgated: 12-14-1994 (59 FR 64303)

Rule Description: This rule sets design and operating standards for bulk gasoline terminals and pipeline breakout stations.

Compliance Status: The permit holder has documented and recorded through emission calculations and through the facility's annual emission inventory reports that the facility is not a major source for HAP as defined in 40 CFR 63.2 – Definitions; therefore, per § 63.420(a)(2), the permit holder is not subject to this rule. However, the permit holder will be subject to the provisions of this rule if the facility becomes a major source for HAP.

L. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
APC Organic Vapor Processing/Disposal System -Thermal Oxidizer

Permit Conditions - SMAQMD Rule 201 Permit to Operate No. 20420

Condition Description: SMAQMD Permit to Operate No. 20420 for the APC Organic Vapor Processing/Disposal System - Thermal Oxidizer limits mass emissions, specifies operating parameters, and specifies record keeping and reporting.

Condition No. 9 clarifies that the physical removal of the refrigeration unit will not be considered a modification of the Title V permit. SFPP does not typically use the refrigeration system and is able to comply with the VOC emission limit without its use. The removal of the refrigeration unit would not increase ROC emissions and therefore would not be considered an equipment modification.

[Condition Nos. 1, 2, 3, 4 and 5 of the SMAQMD permit are not federally enforceable.]

Compliance Status: The APC Refrigeration-Thermal Oxidizer complies with the requirements of the permit conditions.

M. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Tank Truck Unloading System

Permit Conditions - SMAQMD Rule 201 Permit to Operate No. 22882

Condition Description: SMAQMD Permit to Operate No. 22882 Tank Truck Unloading System limits mass emissions, specifies operating parameters, specifies record keeping and specifies Emission Reduction Credit (ERC) requirements.

[Condition Nos. 1, 2, 3 and 4 of the SMAQMD permit are not federally enforceable.]

Compliance Status: The Tank Truck Unloading System complies with the requirements of the permit conditions.

N. APPLICABLE NON-FEDERALLY ENFORCEABLE REQUIREMENTS

None.

O. PERMIT SHIELD

Tank Maintenance:

The requirements from the TV Permit shall not apply when a tank is being emptied, degased, or during sludge removal if the process is conducted by an independent third party contractor and the contractor obtains all required permits from the SMAQMD and/or CARB prior to the process being conducted.

Floating Roof Tanks:

Section 311 of Rule 446 states that all floating roofs must rest on the surface of the liquid contents. This statement was written to define a floating roof and not intended to imply that the roof must, at all times, rest on the surface of the liquid. Tanks need to be emptied regularly for product changes such as winter/summer gasoline formulations or gasoline grade changes. Each time a floating roof tank is emptied, the roof rests on the liquid surface up until the point where the roof's legs reach the bottom of the tank (approximately 6' feet from the bottom). From that point on, the liquid level continues to drop, creating a vapor space between the liquid and the roof. The following language from Volatile Organic Liquid Storage Vessels NSPS (40 CFR, Part 60, Subpart K) will be added to the permit to clarify Section 311 of Rule 446.

The floating roof of an external floating roof tank or internal roof of an internal floating roof tank 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 without creating a safety hazard. [Rule 446, §311 and Rule 207, §307]

P. TITLE V PERMIT RECOMMENDATION

It is recommended that the SFPP, L.P. Bradshaw Terminal Title V Federal Operating Permit be renewed.

See proposed Title V Federal Operating Permit No. TV2012-04-02A for permit conditions.

Reviewed by: _____ Date: _____

Approved by: _____ **Date:** _____

ATTACHMENT A

SMAQMD RULES THAT ARE
"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"
FOR THE SFPP BRADSHAW TERMINAL

**SMAQMD RULES THAT ARE "APPLICABLE FEDERALLY ENFORCEABLE
 REQUIREMENTS"
 FOR THE SFPP BRADSHAW TERMINAL**

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	101	General Provisions and Definitions 10-27-2011 version	Yes - No related conditions are included in the permit because of general nature of the rule.
●	●	102	Circumvention 11-29-1983 version	Yes - No related conditions are included in the permit because of general nature of the rule.
	●	103	Exceptions	No - Source does not operate the type of equipment described in this rule.
	●	104	General Conformity	No - The rule's purpose is to have the SMAQMD review federal conformity findings.
●	●	105	Emission Statement	No - Actual historical emissions from the source are below the rule's applicability level (25 tons/year of VOC or NOx).
		107	Alternative Compliance	No - It is not a SIP-approved rule.
●		108	Minor Violations	No - It is not a SIP-approved rule.
●	●	201	General Permit Requirements 11-20-1984 version	Yes - No related conditions are included in the permit because of the general nature of the rule.
●	●	202	New Source Review 11-20-1984 version	Yes - New and modified permits issued under this rule prior to 8/19/11 contain related conditions that are included in the Title V permit.
●		202	New Source Review 08-23-2012 version	No - It is not a SIP-approved rule/
●	●	203	Prevention of Significant Deterioration 01-27-2011 version	Yes - Rule became effective 08-19-2011. Projects processed after the effective date shall be evaluated under this rule.
		204	Emission Reduction Credits	No - It is not a SIP-approved rule.

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Rule is Applicable Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
	205	Community Bank and Priority Reserve Bank	No - It is not a SIP-approved rule.
	206	Mobile and Transportation Source Emission Reduction Credits	No - It is not a SIP-approved rule.
● *	207	Title V Federal Operating Permit Program 04-26-2001 version	Yes - Related conditions are included in the permit. (*Although this is not a SIP-approved rule, it is applicable because it is part of the approved SMAQMD Title V Permit Program).
	208	Acid Rain	No - It is not a SIP-approved rule.
	209	Limiting Potential to Emit	No - It is not a SIP-approved rule.
	210	Synthetic Minor Source Status	No - It is not a SIP-approved rule.
	211	MACT at Major Sources of Hazardous Air Pollutants	No - It is not a SIP-approved rule, but the requirements of this rule are also contained in the CAA. As per EPA guidance, the MACT requirements for boilers will become applicable after the rule is finalized.
●	213	Federal Major Modifications	No - It is not a SIP-approved rule but the requirements within it are part of EPA's NSR reform and thus federally applicable.
● ●	214	Federal New Source Review 08-23-2012 version	Yes - Related conditions are included in the permit.
	215	Agricultural Permit Requirements and New Agricultural Permit Review	No - It is not a SIP-approved rule.
● *	301	Stationary Source Permit Fees 10-25-2001 version	Yes - Related conditions are included in the permit. (*Although this is not a SIP-approved rule it is

**SMAQMD RULES THAT ARE "APPLICABLE FEDERALLY ENFORCEABLE
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Rule is Applicable Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
			applicable because it is part of the approved SMAQMD Title V Permit Program).
●	302	Hearing Board Fees	No - It is not a SIP-approved rule.
	303	Agricultural Burning Permit Fees	No - It is not a SIP-approved rule.
●	304	Plan Fees	No - It is not a SIP-approved rule.
●	305	Environmental Document Preparation and Processing Fees	No - It is not a SIP-approved rule.
●	306	Air Toxics Fees	No - It is not a SIP approved rule.
● ●	307	Clean Air Act Fees 09-26-2002 version	Yes - No related conditions are included in the permit because of limited applicability.
	310	Permit Fees - Agricultural Source	No - It is not a SIP-approved rule.
● ●	401	Ringelmann Chart 04-05-1983 version	Yes - Related conditions are included in the permit.
●	402	Nuisance	No - It is not a SIP-approved rule.
● ●	403	Fugitive Dust 08-03-1977 version	Yes - Related conditions are included in the permit.
● ●	404	Particulate Matter 11-20-1984 version	Yes - Related conditions are included in the permit.
●	405	Dust and Condensed Fumes 11-29-1983 version	No - The source does not operate such a process.
● ●	406	Specific Contaminants 11-29-1983 version	Yes - Related conditions are included in the permit.
● ●	407	Open Burning	Yes - No related conditions are included in the permit

**SMAQMD RULES THAT ARE "APPLICABLE FEDERALLY ENFORCEABLE
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Rule is Applicable Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		11-29-1983 version	because the source does not conduct open burning.
●	408	Incinerator Burning 11-29-1983 version	No - The source does not operate an incinerator.
●	409	Orchard Heaters 11-29-1983 version	No - The source does not operate orchard heaters.
●	410	Reduction of Animal Matter 11-29-1983 version	No - The source does not operate equipment for the reduction of animal matter.
●	411	Boiler NOx 08-23-2007 version	No - The source does not operate a boiler subject to this rule.
●	412	Stationary IC Engines at Major Stationary Sources of NOx 06-01-1995 version	No - The source does not operate an IC engine.
●	413	Stationary Gas Turbines 03-24-2005 version	No - The source does not operate a gas turbine.
● ●	414	Natural Gas Fired Water Heaters 08-01-1996 version 03-25-2010 version is not SIP- approved	Yes - No related conditions are included in the permit because it applies only to sellers and installers.
	417	Wood Burning Appliances	No - It is not a SIP-approved rule.
	419	NOx from Miscellaneous Combustion Units	No - It is not a SIP-approved rule.
● ●	420	Sulfur Content of Fuels 11-29-1983 version	Yes - Related conditions are included in the permit.
●	421	Mandatory Episodic Curtailment of Wood and Other Solid Fuel	No - The source does not operate any equipment subject to this rule.

**SMAQMD RULES THAT ARE "APPLICABLE FEDERALLY ENFORCEABLE
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Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
			Burning 09-24-2009 version	
●	●	441	Organic Solvents 11-29-1983 version	Yes - No related conditions are included in the permit because of limited applicability.
●	●	442	Architectural Coatings 09-24-2015 version	Yes - Related conditions are included in the permit.
	●	443	Leaks from Synthetic Organic Chemical and Polymer Manufacturing 09-05-1996 version	No - The source does not operate synthetic organic chemical or polymer manufacturing equipment.
	●	444	Petroleum Solvent Dry Cleaning 08-13-1981 version	No - The source does not operate petroleum solvent dry cleaning equipment.
	●	446	Storage of Petroleum Products 11-16-1993 version	Yes - Related conditions are included in the permit.
	●	447	Organic Liquid Loading 04-02-1998 version	Yes - Related conditions are included in the permit.
	●	448	Gasoline Transfer into Stationary Storage Containers 02-26-2009 version	No - The source does not operate gasoline transfer equipment subject to this rule.
	●	449	Transfer of Gasoline into Vehicle Fuel Tanks 02-26-2009 version	No - the source does not operate gasoline transfer equipment subject to this rule.
	●	450	Graphic Arts Operations 10-23-2008 version	No - the source does not operate a graphic arts process as defined in the rule.
●	●	451	Surface Coating of Miscellaneous Metal Parts and Products 10-28-2010 version	No - the source does not coat metal parts subject to this rule.

**SMAQMD RULES THAT ARE "APPLICABLE FEDERALLY ENFORCEABLE
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Rule is Applicable Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	452	Can Coating 09-25-2008 version	No - the source does not operate a can coating process.
●	453	Cutback and Emulsified Asphalt Paving Materials 11-29-1983 version	No - the source does not manufacture or apply cutback or emulsified asphalt paving materials.
●	454	Degreasing Operations 09-25-2008 version	No - the source does not operate degreasers subject to this rule.
●	455	Pharmaceuticals Manufacturing 11-29-1983 version 09-05-1996 version is not SIP- approved Repealed: 04-08-2016	No - the source does not manufacture pharmaceuticals.
●	456	Aerospace Coating Operations 10-23-2008 version	No - the source does not coat aerospace parts.
	457	Methanol Compatible Tanks 09-10-1991 version	No - it is not a SIP-approved rule.
●	458	Large Commercial Bread Bakeries 09-05-1996 version	No - the source does not produce bread products.
●	459	Automotive, Truck and Heavy Equipment Refinishing Operations 08-25-2011 version	No - the source does not refinish vehicles.
●	460	Adhesives and Sealants 11-30-2000 version	No - it is not a SIP-approved rule.
●	463	Wood Products Coatings 09-25-2008 version	No - it is not a SIP-approved rule.
●	464	Organic Chemical Manufacturing Operations	No - the source does not manufacture organic chemicals.

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 FOR THE SFPP BRADSHAW TERMINAL**

Rule is Applicable Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
		09-25-2008 version	
	465	Polyester Resin Operations 09-25-2008 version	No - it is not a SIP-approved rule.
●	466	Solvent Cleaning 10-28-2010 version	No - the source does not perform solvent cleaning
	485	Municipal Landfill Gas 07-23-1998 version	No - it is not a SIP-approved rule.
	496	Large Confined Animal Facilities 08-24-2006 version	No - it is not a SIP-approved rule.
●	501	Agricultural Burning 12-06-1978 version 04-03-1997 version is not SIP- approved	No - the source does not conduct agricultural burning.
●	601	Procedure before the Hearing Board 02-05-1998 version	No - it is not a SIP-approved rule.
●	602	Breakdown Conditions: Emergency Variance 12-06-1978 version	No - it is not a SIP-approved rule.
● ●	701	Emergency Episode Plan 05-27-1999 version	No - emissions from the source are below the rule's applicability level.
●	801	New Source Performance Standards 05-26-11 version	No - it is not a SIP-approved rule. <i>Note: there are equivalent federal regulations.</i>
●	901	General Requirements 12-06-1978 version	No - it is not a SIP-approved rule. <i>Note: there are equivalent federal regulations.</i>

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Rule is Applicable Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	902	Asbestos 10-01-1998 version	No - it is not a SIP-approved rule. <i>Note: there is an equivalent federal regulation.</i>
●	903	Mercury 12-06-1978 version	No - it is not a SIP-approved rule. <i>Note: there is an equivalent federal regulation.</i>
●	904	Airborne Toxic Control Measures 05-26-11 version	No - it is not a SIP-approved rule. <i>Note: there are equivalent federal regulations for some of the listed ATCMs.</i>
	1002	Fleet Inventory 07-19-1994 version	No - it is not a SIP-approved rule.
	1003	Reduced-Emission Fleet Vehicles/Alternative Fuels 07-19-1994 version	No - it is not a SIP-approved rule.
	1005	Mobile Source Emission Reduction Credits/Banking 07-19-1994 version	No - it is not a SIP-approved rule.
	1006	Transportation Conformity 11-03-1994 version	No - it is not a SIP-approved rule.

ATTACHMENT B

SMAQMD RULE 201 PERMITS TO OPERATE