Bay Area Air Quality Management District

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Permit Evaluation
and
Statement of Basis
for
Minor Revision of the
MAJOR FACILITY REVIEW PERMIT

for

Shore Terminals
Facility #A7034

Facility Address:
2801 Waterfront Road
Martinez, CA 94553

Mailing Address:
2801 Waterfront Road
Martinez, CA 94553

May 2005

Application Engineer: Thu H. Bui
Site Engineer: Thu H. Bui

Application: 10492

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Title V Statement of Basis

A. Background

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the "potential to emit," as defined by BAAQMD Regulation 2-6-218, of more than 100 tons per year of a regulated air pollutant, or 10 tons per year of a hazardous air pollutant, or more than 25 tons per year of a combination of hazardous air pollutants.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility identifier that consists of a letter and a 4-digit number. This identifier is also considered to be the identifier for the permit. The identifier for this facility is A7034.

Current Permit Action

- Shore Terminals applied to modify its Title V permit due to the addition of two new internal floating roof tanks under District's Application # 10493. The District granted the authority to construct on 11/12/04.

- This revision is considered to be a minor revision because the tanks are new tanks, not modified as defined by 40 CFR 60, Subpart A, Section 14(a).

B. NSR Permit Evaluation

See Appendix B

C. Permit Content

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities.

Changes in this action

The following sentence was added to Standard Condition: "If the permit renewal has not been issued by February 28, 2006, but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application". This is the "application shield" pursuant to BAAQMD Regulation 2-6-407.

II. Equipment

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S24).

Changes in this action

- The description of Sources S-79 and S-80, Internal Floating Roof Tanks, and their capacities were added to Table II A- Permitted Sources.
- The words "continuous hydrocarbon monitor" under Operating Parameters were removed from the description of A-41, thermal oxidizer on Table II B-Abatement Devices.

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit.

Changes in this action

- Language has been added to Section III to clarify that this section contains requirements that may apply to temporary sources. This provision allows contractors that have "portable" equipment permits that require them to comply with all applicable requirements to work at the facility on a temporary basis, even if the permit does not specifically list the temporary source. Examples are temporary sandblasting or soil-vapor extraction equipment.
- The following address of EPA Region 9's website was added: http://yosemite.epa.gov/R9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions.
- Table III was updated as follows:

  BAAQMD Regulation 8, Rule 2 - Organic Compounds – Miscellaneous Operations (6/15/94) was added.
  BAAQMD Regulation 8, Rule 4 - Organic compounds – General Solvent and Surface Coating Operations (10/16/02) was added.
  BAAQMD Regulation 8, Rule 15 - Organic compounds – Emulsified and Liquid Asphalts (6/1/94) was added.
  BAAQMD Regulation 8, Rule 18 – Replaced Valves and Connectors at Petroleum Complexes, Chemical Plants, Bulk Plants and Bulk Terminals with Organic compounds – Equipment Leaks (9/15/04).
  SIP Regulation 8, Rule 18 – Replaced Valves and Connectors at Petroleum Complexes, Chemical Plants, Bulk Plants and Bulk Terminals with Organic compounds – Equipment Leaks (11/27/02)

SIP Regulation 8, Rule 25 - Organic compounds – Pumps and Compressors at Petroleum Refineries, Chemical Plants, Bulk Plants and Bulk Terminals (6/1/94) was deleted.
BAAQMD Regulation 8, Rule 40 - Organic compounds – Aeration of Contaminated Soil and Removal of the Underground Storage Tanks (12/15/99), was added.
The date of adoption for the revised BAAQMD Regulation 8, Rule 51 - Organic compounds – Adhesive and Sealant Products was changed from 12/20/95 to 7/17/02.
SIP Regulation 8, Rule 51 - Organic compounds – Adhesive and Sealant Products (2/26/02) was added.
BAAQMD Regulation 9, Rule 1– Inorganic Gases Pollutants – Sulfur Dioxides (3/15/95) was added.
The date of adoption for the revised BAAQMD Regulation 11, Rule 2 was changed from 12/4/91 to 10/7/98.
California Health and Safety Code Section 41750 et seq. for Portable Equipment was added.

IV. Source-Specific Applicable Requirements

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit.

Complex Applicability Determinations

This action did not require any complex applicability determinations

Other changes in this action

- Table IV-L was added to specify the source specific requirements for S-79 and S-80, internal floating roof tanks.
- The total POC emission was changed from 67.146 to 71.426 tons in Condition # 1253, Part IB at all source specific applicable requirements Table IV, to reflect the emission increase due to two additional tanks.
- BAAQMD Condition 1253 IB, facility wide POC emission limitation was added to Table IV-K for sources S-76, S-77 and S-78.
- Applicable requirement Regulation 6-310.1 was corrected to Regulation 6-310 - Particulate Weight Limitation in Table IV-J for sources S-74 and S-75, emergency diesel generators.

V. Schedule of Compliance

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

"409.10 A schedule of compliance containing the following elements:

10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;

10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and

10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted."

Since the District has not determined that the facility is out of compliance with an applicable requirement, the schedule of compliance for this permit contains only sections 2-6-409.10.1 and 2-6-409.10.2.

There have been no changes in compliance status since the last permit application.

VI. Permit Conditions

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

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

All changes to existing permit conditions are clearly shown in "strike-out/underline" format in the proposed permit. When the permit is issued, all 'strike-out" language will be deleted and all "underline" language will be retained, subject to consideration of comments received.

Additional monitoring has been added, where appropriate, to assure compliance with the applicable requirements.

<u>Changes in this action</u>

- Modification of Condition 1253, Part IB and Schedule A to reflect the new POC emission limit (71.426 tpy) due to additional tanks.
- Abatement A-41 was changed to A-1 for consistency in Condition 1253, Part IV.
- Condition 21829 was added for Sources S-79 and S-80, internal floating roof tanks.

VII. Applicable Limits and Compliance Monitoring Requirements

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. The applicable requirements for monitoring are completely contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

Changes in this action

- Table VII-L was added to specify the applicable limits and compliance monitoring requirements for two new internal floating roof tanks, S-79 and S-80.
- The total POC emission was changed from 67.146 to 71.426 tons in Condition # 1253, Part IB at all source specific applicable requirements Table VII, to reflect the emission increase due to two additional tanks.
- The benzene monitoring in Condition 20060, part 4, has been added to Table VII-K since it was omitted in error. This monitoring is already included in Sections IV and VI of the permit.

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section IV of the permit.

IX. Revision History

The Revision History was updated.

X. Glossary

This section contains terms that may be unfamiliar to the general public or EPA.

APPENDIX A

GLOSSARY

ACT
Federal Clean Air Act

APCO
Air Pollution Control Officer

ARB
Air Resources Board

BAAQMD
Bay Area Air Quality Management District

BACT
Best Available Control Technology

Basis
The underlying authority that allows the District to impose requirements.

CAA
The federal Clean Air Act

CAAQS
California Ambient Air Quality Standards

CAPCOA
California Air Pollution Control Officers Association

CEM
Continuous Emission Monitor

CEQA
California Environmental Quality Act

CFR
The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO
Carbon Monoxide

Cumulative Increase
The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Cumulative increase is used to determine whether threshold-based requirements are triggered.

District
The Bay Area Air Quality Management District

dscf
Dry Standard Cubic Feet

EPA
The federal Environmental Protection Agency.

Excluded
Not subject to any District regulations.

FDOC
Final Determination of Compliance (FDOC), prepared pursuant to District Regulation 2, Rule 3, Power Plants.

Federally Enforceable, FE
All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

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

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

HRSG
Heat Recovery Steam Generator

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

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

MOP
The District's Manual of Procedures.

NAAQS
National Ambient Air Quality Standards

NESHAPS
National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Parts 61 and 63.

NMHC
Non-methane Hydrocarbons (Same as NMOC)

NMOC
Non-methane Organic Compounds (Same as NMHC)

NOx
Oxides of nitrogen.

NSPS
Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR Part 60 and District Regulation 10.

NSR
New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement
A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NOx, PM10, and SO2.

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

POC
Precursor Organic Compounds

PM
Particulate Matter

PM10
Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD
Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

PUC
Public Utilities Commission (California)

SIP
State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO2
Sulfur dioxide

THC
Total Hydrocarbons (NMHC + Methane)

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

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

TPH
Total Petroleum Hydrocarbons

TRMP
Toxic Risk Management Plan

TSP
Total Suspended Particulate

VOC
Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
cfm	=	cubic feet per minute
g	=	grams
gal	=	gallon
gpm	=	gallons per minute
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m^2	=	square meter
min	=	minute
mm	=	million
MMbtu	=	million btu
MMcf	=	million cubic feet
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

APPENDIX B

NSR PERMIT EVALUATION

EVALUATION REPORT
SHORE TERMINALS-SELBY
Application #10943 - Plant #7034

2801 Waterfront Road
Martinez, CA 94553

I. BACKGROUND

Shore Terminals - Martinez has applied for an Authority to Construct/Permit to Operate for the following equipment:

S-79 Storage Tank # 20001, internal floating roof tank, 166 ft Dia., 200,000 barrels capacity.
S-80 Storage Tank # 20002, internal floating roof tank, 166 ft Dia., 200,000 barrels capacity.

These tanks will store gasoline and other petroleum products, which will be transferred to and from existing pipelines. These tanks will also be connected to the truck loading rack; however, it will not be used at this time. In fact, the truck loading rack operation is not being used at this time at all because there is no demand for it. In the future, if gasoline from sources S-79 and S-80 are routed to the truck loading rack, Shore Terminals will need to review its truck loading rack operation and apply for any increases from the upstream sources.

Shore Terminals has also applied to modify its Title V permit due to the addition of these two new tanks (Application # 10492). This permit is under review at this time.

II. EMISSION INCREASES

The tanks will have a fixed roof on top, and an internal floating roof design. The floating roof deck will be cable supported with a single, center column and there are no adjustable leg fittings for this deck to minimize the emissions during tank degassing. The emissions from these tanks are calculated by EPA Tank 4.0 program using gasoline with Reid Vapor Pressure of 11 and Sacramento meteorological data. (See attached calculations)

Tank Emissions (EPA Tank 4.0):
Throughput = 8,400,000 gal X 24 times/yr = 201,600,000 gal/yr for each tank

	Annual (lb/yr)	Daily (day/yr)	
Rim loss	860.08	2.36	(365 day/yr)
Working loss	241.19	9.65	(25 time/yr)
Deck fitting loss	3163.13	8.67	(365 day/yr)
Maximum emissions	4264.23	20.68	

Fugitive Component Emissions:
Implementation Guidelines for estimating mass Emissions of Fugitive Hydrocarbon Leaks at Facilities – February 1999". The emissions factors are contained in Table IV-1b, " 1995 EPA Protocol Marketing Terminal Average Emission Factors".

Fugitive sources	Number	Emission Factor kg/hr/source	Annual Emissions lbs/yr
Valves – light liq.	16	4.3 X 10-5	6.03
Flanges–liq.	68	8.0 X 10-6	4.77
Pump seals – liq.	4	5.4 X 10-4	18.92
Total			29.72

Total Emissions = (4,264.23 X 2) + 29.72 = 8,558.18 lb/yr or 4.28 tpy

III. TOXIC SCREENING ANALYSIS

Sources S-79, and S-80 required the health risk screening analysis because benzene emissions from three sources exceeded the toxic trigger level assuming the maximum vapor benzene concentration in the gasoline is at 1.4 % by weight. (See attached letter dated September 9, 2004 for benzene fraction)

The toxic risk was performed based on the cumulative impacts from all related projects permitted within the last two years. The emissions from tanks S-76, S-77 and S-78 were included because they were given Permit to Operate in November 2003 under application # 5850.

Toxic Pollutant	Benzene Emission Rate	Trigger Level
S-79	59.9 lb/yr	6.7 lb/yr
S-80	59.9 lb/yr	6.7 lb/yr
S-76	6.7 lb/yr	6.7 lb/yr
S-77	6.7 lb/yr	6.7 lb/yr
S-78	6.7 lb/yr	6.7 lb/yr

The cancer risk to the maximally exposed industrial receptor is 0.13 in a million. Thus, in accordance with the risk management policy the screen passes since the sources comply with TBACT standards. (See attached toxic report dated 10/5/04)

Note: The results of toxics risk screen analysis dated 10/5/04 were based on the benzene emission rate of 66.32 lb/yr. The above risks were prorated because the actual benzene emission rate of all 5 tanks is 139.9 lb/yr.

IV. BEST AVAILABLE CONTROL TECHNOLOGY

BACT is triggered for this application because VOC emissions from each source S-79, or S-80 are more than 10 lb/day. Sources S-79 and S-80 are equipped with BACT(2) level with the installation of the internal floating roofs. Both tanks are equipped with BAAQMD approved roof with primary seal and zero gap secondary seal, all meeting design criteria of Reg. 8, Rule 5. Also, no ungasketed roof penetrations, no slotted pipe guide pole unless equipped with float and wiper seals, and no adjustable roof legs unless fitted w/ vapor seal boots or equivalent.

V. OFFSETS

Offsets are required for source S-79, and S-80 because the potential to emit from this facility is greater than 50 ton/yr. Shore Terminal – Martinez will provide offsets at a ratio of 1.15:1 for this application.

Offsets: 4.28 tpy X 1.15 = 4.922 tpy for this application
Shore Terminals – Martinez had submitted the company's Banking Certificate of Deposit # 852 to provide offsets for this project.

Banking Certificate of Deposit # 852 currently has 8.468 tpy POC and 11.352 tpy NO_2. Thus, the Banking Certificate will be reissued to Shore Terminal in the amount of 3.546 tpy POC and 11.352 tpy NO_2.

POC = 8.468 tpy – 4.922 tpy = 3.546 tpy

VI. PLANT CUMULATIVE INCREASE SINCE 4/5/1991

	Current Ton/yr	New Ton/yr	New Total Lbs/yr	New Total Tons/yr
POC =	0.00	4.28	0.00	0.00
NO_x =	0.00	0.00	0.00	0.00
SO_2 =	0.00	0.00	0.00	0.00
CO =	0.00	0.00	0.00	0.00
NPOC =	0.00	0.00	0.00	0.00
TSP =	0.00	0.00	0.00	0.00
PM_{10} =	0.00	0.00	0.00	0.00

VII. STATEMENT OF COMPLIANCE

This application is subject to Regulation 8, Rule 5-305.2 and 305.3, 320, 321, 322, and 328, which requires that storage tanks larger than 39 thousand gallons be equipped with either liquid mounted or metallic shoe primary seals and a secondary subject to Regulation 8-5-321 and 322, respectively. Section 8-5-305.3 requires that tanks must be

equipped with at least 3 viewing ports in the fixed roof of the tank. Section 8-5-328 requires that tank-degassing operations be controlled. Sources S-79 and S-80 are expected to comply with the standards of Regulation 8, Rule 5 since the sources will have:

(a) Internal floating roof with either liquid or mechanical primary seal, and rim mounted secondary seal.

(b) Minimum of 3 viewing ports.

(c) Tank degassing with at least 90% control efficiency.

Sources S-79, and S-80 are subject and expected to comply with Regulation 10 - Standard of Performance for New Stationary, 40 CFR 60, Subpart Kb - Volatile Organic Liquid Storage Vessels. The internal floating roof will be equipped with either a liquid or mechanical shoe primary and rim mounted secondary seals.

This application is subject to NESHAP 40 CFR 63, Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals). The sources will comply with Section 63.432, which requires compliance with NSPS subpart Kb (Section 60.112b).

This project is considered to be ministerial under the District's CEQA Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors in accordance with Permit Handbook Chapter 4.1.

This project is over 1,000 ft from the nearest public school and is therefore not subject to the public notification requirements of Regulation 2-1-412.

PSD is not triggered.

VIII. CONDITIONS

Condition for Sources S-79, and S-80, internal floating roof tanks, Application # 10493, Plant # 7034 Shore Terminals-Martinez.

1. The owner/operator of S-79 and S-80 shall not exceed 403,200,000 gallons of material throughput during any consecutive 12 month period. [Basis: Cumulative Increase]

2. Only gasoline, diesel and jet fuel shall be stored in S-79 and S-80. [Basis: Cumulative Increase]

    a. A liquid other than those specified above may be stored in S-79 and S-80, provided that both of the following criteria are met:
    i. POC emissions, based on the maximum throughput Part 1, do not exceed 8,558 pounds per year
    ii. Toxics emissions in pound per year, based on the maximum throughput in Part 1, do not exceed any risk screening trigger level.

3. Sources S-79 and S-80 shall be equipped with a liquid mounted primary seal and a zero-gap secondary seal. There shall be no ungasketed roof fittings. Except for roof legs and guide poles/wells, each roof fitting shall be of the design, which yields the minimum roof fitting losses (per EPA Compilation of Air Pollution Emission Factors, AP-42, Supplement E, Section 12.3.2, Table 12.3-11). The following list indicates the type of control required for a variety of typical roof fittings. Control techniques for roof fittings not included in this list shall be subject to District approval, prior to installing the roof on the tank.

Fitting Type	*Control Technique*
Access hatch	Bolted cover, gasketed
Guide pole / Well	Unslotted guide pole, gasketed sliding cover, or Slotted with controls per API 2517 Addendum (See Note 1)
Gauge float well	Bolted cover, gasketed
Gauge hatch / Sample well	Weighted mechanical actuation, gasketed
Vacuum breaker	Weighted mechanical actuation, gasketed
Roof drain	Roof drain does not drain water into product
Roof leg	Fixed or adjustable with vapor seal boot or gasket between roof leg and leg sleeve
Rim vent	Weighted mechanical actuation, gasketed

Note 1: Slotted Guide Pole Control Configuration, per Addendum to API Publication 2517, May 1994, shall include the following components:

a. Sliding cover.
b. Well gasket.
c. Pole sleeve with pole wiper approximately 6 inches above sliding cover, or District approved equivalent.
d. Float with float wiper approximately 1 inch above the sliding cover, or alternately a float with multiple wipers.
(Basis: BACT)

4. The maximum vapor benzene concentration in all hydrocarbon liquids stored in Storage Tanks S-79, and S-80 shall not exceed 1.4 % by weight. The owner/operator of sources S-79, and S-80 shall analyze gasoline stored in each of these tanks for benzene concentration at least once every 6 months. Each tank shall be sampled within 30 days of

start-up. If the owner/operator can demonstrate that several tanks contain hydrocarbon from a single source (shipment), then a single benzene analysis may be performed for that group of tanks. These records shall be kept on file for at least 5 years after the date of entry and shall be made available to District personnel upon request. All tests shall be performed in accordance with District approved laboratory procedures. . [Basis: Toxics]

5. All new valves and flanges associated with this project shall be subject to the inspection and maintenance criteria of District Regulation 8-18 and any future revisions to this rule. [Basis: Reg. 8-18]

6. No gasoline shall be transferred from S-79 and S-80 to the tank truck loading rack (S-20). [Basis: Cumulative Increase]

7. In order to demonstrate compliance with the above conditions, the owner/operator of tanks S-79, and S-80 shall maintain the following records in a District approved log. These records shall be kept on site and made available for District inspection for a period of at least five years from the date that the record was made. [Basis: Record keeping]
   a. The type and VOC content of all materials stored and the dates that the materials were stored.
   b. The total daily throughput of each material stored, summarized on a monthly and annual basis.

IX. RECOMMENDATION

It is recommended that conditional Authority to Constructs be granted to Shore Terminal - Martinez for the following equipment:

S-79 Storage Tank # 20001, internal floating roof tank, 166 ft Dia., 200,000 barrel capacity.

S-80 Storage Tank # 20002, internal floating roof tank, 166 ft Dia., 200,000 barrel capacity.