ORIGINAL

PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

PETITIONER: EQUILON ENTERPRISES, LLC SHELL OIL PROD. US____ CASE NO:_4982-134_____

_____ FACILITY ID:____800369_____

FACILITY ADDRESS:8100 Haskell Ave_____
[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: Van Nuys, CA, 91406

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

☐ INTERIM ☒ SHORT ☐ REGULAR ☐ EMERGENCY ☐ *EX PARTE* EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Brian J. Faulkner, Legal Counsel - Environmental
Shell Oil Company
150 N. Dairy Ashford
Houston, TX *Zip 77079*
☎ (832) 762-2951 *Ext.*
Fax (____) _____
E-mail brian.faulkner@shell.com

Christopher Sherman, Environmental Advisor
Equilon Enterprises LLC dba Shell Oil Products US
20945 S Wilmington St.
Carson, CA *Zip 90744*
☎ (310) 816-6025 *Ext.*
Fax (____) _____
E-mail christopher.sherman@shell.com

3. RECLAIM Permit ☐ Yes ☒ No Title V Permit ☒ Yes ☐ No

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

N/A

5. Briefly describe the type of business and processes at your facility.

Shell Van Nuys is a terminal that receives, ships, stores and distributes various refined petroleum products. Products are primarily received by pipeline and placed in storage tanks for further distribution. Also, various fuel components are offloaded by trucks

A vapor holder (bladder tank) (G15482, A/N 505267) is used to regulate flow of VOC emissions during the loading of petroleum products into tanker trucks. Once loading starts, all tanker truck vapors that are displaced as a compartment is filled with gasoline go through the vapor collection system and into the bladder tank. When the bladder reaches a certain height/volume, a blower starts which routes the vapors to the carbon adsorption vapor recovery unit (VRU). The VRU has two carbon canisters in parallel – the vapors go through one canister where VOCs are adsorbed, while the second canister is being regenerated with a vacuum process that pulls the vapors from the carbon and condenses them and returns the liquid to storage. The VRU switches between canisters every 15 minutes, so one canister is adsorbing vapors while the other is being regenerated. This process continues until the bladder is empty and starts again when the bladder is full.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Vapor Recovery System	Permit No. G15482 A/N 505267	N/A	N/A
Gasoline Bulk Loading Rack No. 1	Permit No. G8246 A/N 393491	N/A	N/A
Gasoline Bulk Loading Rack No. 2	Permit No. G8247 A/N 393492	N/A	N/A

*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

A vapor holder (bladder tank) is used to regulate flow of VOC emissions during the loading of petroleum products into tanker trucks. Once loading starts, all tanker truck vapors that are displaced as a compartment is filled with gasoline go through the vapor collection system and into the bladder tank. When the bladder reaches a certain height/volume, a blower starts which routes the vapors to the carbon adsorption vapor recovery unit (VRU). The Facility's Title V permit allows the VRU to operate without the bladder tank (bypass mode) at a very reduced throughput rate. Operating at this reduced rate for more than a few hours will significantly limit supply to the retail gasoline market, increase costs and risks of supply to the retail gasoline market, and create excessive diesel emissions associated from approximately 22 incremental daily gasoline tank truck loads sourced from the South Bay into the Van Nuys market.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes ☒ No ☐

If yes, how often: Daily; Once/Month; Quarterly

Date of last maintenance and/or inspection API 653 and bladder inspection was on 12/15/2005

Describe the maintenance and/or inspection that was performed.

The bladder is inspected and maintained per industry and Shell requirements. A sight, sound, and smell inspection are completed daily by facility operators. The bladder is inspected monthly via pressure trending by the facility operators. Quarterly TVA inspections (VOC leak inspections with a portable instrument) by an outside contractor are completed. Replacement of the bladder is a scheduled maintenance requirement.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
A/N 505267 Condition 1	Condition requires operation "in accordance with all data and specifications submitted with the application under which this permit is issued". Portable bladder was not part of application.
A/N 393491 Conditions 1, 5	Condition 1 requires operation "in accordance with all data and specifications submitted with the application under which this permit is issued". Portable bladder was not part of application. Condition 5 requires load rack to vent to control equipment that has been issued a PTO by the District. The control device PTO does not allow for use of a portable bladder.
A/N 393492 Condition 1, 5	Condition 1 requires operation "in accordance with all data and specifications submitted with the application under which this permit is issued". Portable bladder was not part of application. Condition 5 requires load rack to vent to control equipment that has been issued a PTO by the District. The control device PTO does not allow for use of a portable bladder.

10. Are the equipment or activities subject to this request currently under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes ☐ No ☒

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes ☐ No ☒

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes ☐ No ☒

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

The bladder in the bladder tank is nearing end-of-life. Approximately 1.5 years ago, Shell has submitted an application to modify the Title V permit to bring in a portable bladder unit to use while the bladder in the bladder tank is being replaced. The Title V application review process is taking a very long time and it is unknown when the permit to construct will be issued. The Title V permit allows the VRU to operate without the bladder tank (bypass mode) at a very reduced throughput rate. Operating at this reduced rate for more than a few hours will significantly limit supply to the retail gasoline market, increase costs and risks of supply to the retail gasoline market, and create excessive diesel emissions associated from approximately 22 incremental daily gasoline tank truck loads sourced from the South Bay into the Van Nuys market.

Another option under Shell's Title V Permit allows the use of a portable thermal oxidizer to control truck rack emissions during the bladder tank option. This option would allow Shell to maintain current throughput and have no impact to the gasoline retail market. This option would create incremental greenhouse gases and combustion pollutants such as NOx and particulate matter. Shell would prefer the use of a portable bladder as this would not create combustion emissions and greenhouse gases and have no incremental emissions over current operations.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

A permit application to use a portable bladder tank in place of the fixed bladder tank was submitted on 2/25/2022. It was expected that a permit to construct would be issued within a year but more than a year has passed and a date that the permit to construct will be issued is unknown. At this point the permit is still under review by the District and must also be reviewed by the EPA after the District review is complete. The bladder is nearing end-of-life and Shell wishes to replace the bladder soon so not to impact gasoline retail market and not create any incremental emissions. The date of receiving the permit to use the portable bladder is unknown, and Shell has decided to apply for a variance.

16. List date(s) and action(s) you have taken since that time to achieve compliance.

The permit application was submitted on February 25, 2022. There have been multiple inquires to the agency regarding the status of the Title V application, and it is not known when the PTC will be issued.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: $ 600,000

Number of employees laid off (if any): N/A

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

Replacement of the Bladder will take approximately 6-8 weeks The incremental cost of a portable thermal oxidizer in place of the portable bladder unit is approximately $600,000. More importantly, the portable thermal oxidizer would create incremental greenhouse gases and combustion pollutants while the portable bladder unit has no incremental emissions impact over the current operation.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

The title V permit allows the VRU to operate without the bladder tank (bypass mode) at a very reduced throughput rate. Operating at this reduced rate for more than a few hours will significantly limit supply to the retail gasoline market, increase costs and risks of supply to the retail gasoline market, and create excessive diesel emissions associated from approximately 22 incremental gasoline tank truck loads sourced from the South Bay into the Van Nuys market.

Another option under Shell's Title V Permit allows the use of a portable thermal oxidizer to control truck rack emissions during the bladder tank option. This option would allow Shell to maintain current throughput and have no impact to the gasoline retail market. This option would create incremental greenhouse gases and combustion pollutants. Shell would prefer the use of a portable bladder as this would not create any pollutants or greenhouse gases and have no incremental emissions over current operations

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A) Total Estimated Excess Emissions (lbs/day)	(B) Reduction Due to Mitigation (lbs/day)	(C)* Net Emissions After Mitigation (lbs/day)
	N/A	N/A	N/A

* Column A minus Column B = Column C

Excess Opacity:_____%

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

There will be no excess emissions during the period of the variance because the portable vapor bladder will operate as it's permitted counterpart and all other equipment at the facility will continue to operate normally and in compliance with all applicable rules and permit conditions.

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

N/A. There will be no excess emissions.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

Emissions will be monitored in the same way as under current operations – a continuous emission monitoring system measures VOC concentration in the VRU exhaust.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

Operations will essentially be normal, with the only difference being the use of a portable bladder tank in place of the fixed bladder tank.

24. State the date you are requesting the variance to begin: 7/17/2023; and the date by which you expect to achieve final compliance: 10/14/2023

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

Khang Nguyen (909) 396-3210 Ext.

Ext.

If the petition was completed by someone other than the petitioner, please provide their name and title below.

Name Company Title

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on 5/23/2023, at Carson, California

Signature

Christopher Sherman
Print Name

Title: Environmental Advisor

FACILITY PERMIT TO OPERATE
EQUILON ENTER. LLC, SHELL OIL PROD. U.S.

PERMIT TO OPERATE

Permit No. G15482
A/N 505267

Equipment Description:

VAPOR RECOVERY SYSTEM, JOHN ZINK, MODEL NO. AA609-4-1313, CAPACITY 180 CFM, OPERATING AS A HIGH EFFICIENCY ADSORPTION/ABSORPTION (HEAA) SYSTEM, CONSISTING OF:

1. TWO CARBON ADSORBERS, EACH 5'-0" DIA. X 13'-0" H.
2. GASOLINE ABSORBER TOWER, 2'-6" DIA. X 12'-0" H.
3. SEAL FLUID SEPARATOR, 4'-0" DIA. X 10'-0" L.
4. VACUUM PUMP, WITH 75 HP MOTOR, WITH A BACKUP
5. VACUUM BOOSTER, WITH A 50 HP MOTOR
6. GASOLINE SUPPLY PUMP, CENTRIFUGAL
7. GASOLINE RETURN PUMP, CENTRIFUGAL
8. SEAL FLUID CIRCULATION PUMP, CENTRIFUGAL
9. SEAL FLUID EXCHANGER
10. BLOWER, CENTRIFUGAL, WITH A BACKUP
11. VAPOR HOLDER, 30,000 CUBIC FEET CAPACITY, 38'-0" DIA. X 24'-0" H., SERVING TWO GASOLINE LOADING RACKS AND TWO WASTEWATER STORAGE TANKS.
12. VAPOR HOLDER BYPASS

Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[RULE 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[RULE 204]

3. The operator shall limit the flow rate of the vent gas to the carbon adsorber to no more than 180 standard cubic feet per minute (1-hour average). The total volume of vapors venting to the carbon adsorbers shall not exceed 152,588 cubic feet per day. To comply with this condition, the operator shall install, maintain, and operate a flow meter to monitor and record the flow rate of the gases sent to the carbon adsorber at least once every minute. In addition, a daily total of vapors vented to the adsorbers should also be kept.

[RULE 1303 (b)(2)-OFFSETS, 1313(g)-EMISSION LIMITATION]

4. The facility shall install and maintain a Continuous Monitoring System (CMS) in compliance with a South Coast AQMD approved Rule 462 Compliance Plan.
[RULE 462]

5. A continuous hydrocarbon monitoring system shall be in full use at all times and shall alert the operator both audibly and visually to stop venting to the air pollution control system when the hydrocarbon concentration in the air pollution control exhaust is in excess of permitted limit(s).
[RULE 462]

6. The Non-Methane Hydrocarbon (NMHC) concentration at the exhaust of the air pollution control system shall not exceed 1.9%, measured as propane on an instantaneous basis, or 0.66%, measured as propane based on a rolling 15 minute average. Upon measurement of the NMHC concentration exceeding any one of these limits, venting of vapors to the carbon adsorbers shall cease for at least a period equal to one complete cleaning cycle of both carbon adsorbers (30 minutes on a 15 minute cycle time). Venting to the carbon adsorbers shall not resume until the NMHC concentration at the exhaust is below both limits.
[RULE 462]

7. Throughput records and CMS data, including, but not limited to, calibration log, troubleshooting log, etc. shall be maintained for a period of five years and made available upon request by South Coast AQMD personnel.
[RULE 462]

8. The vapor holder may be bypassed during periods of maintenance, repair, breakdown, or other times determined appropriate by the permittee. VOC emissions shall not exceed 0.08 pounds per 1000 gallons of organic liquid loaded while the bladder tank is bypassed. The operator shall keep records of the dates and durations when the bladder is inoperable and the vapor recovery system is in bypass mode.
[RULE 1303(a)(1)-BACT, RULE 1303(b)(2)-OFFSET]

Periodic Monitoring:

9. The operator shall conduct source test(s), when the system is in normal mode, in accordance with the following specifications:

The test shall be conducted at least once every 60 calendar months.
The test shall be conducted to determine the bulk loading rate in gallons per hour during the source test.

The test shall be conducted to determine the total VOC emission rate in pounds per 1000 gallons of organic liquid loaded and in milligrams per liter of gasoline loaded.
[RULE 1303(a)(1)-BACT, RULE 3004(a)(4)-PERIODIC MONITORING]

Emissions and Requirements:

10. VOC: 0.08 Lbs/1000 Gal, Rule 462
TOC/VOC: 35 mg/l, 40 CFR 60 Subpart XX

PERMIT TO OPERATE

Permit No. G8246
A/N 393491

Equipment Description:

GASOLINE BULK LOADING RACK NO. 1 CONSISTING OF:

1. SIX BOTTOM LOADING ASSEMBLIES WITH DRY-BREAK CONNECTION.
2. SIX PRODUCT METERS.
3. TWO VAPOR RECOVERY ARMS.
4. FOUR LOADING PUMPS (TWO STANDBY), 40-HP EACH.
5. TWO LOADING PUMPS (ONE STANDBY), 75-HP EACH.
6. ONE ETHANOL METERING SKID CONSISTING OF SIX (6) 1.5" TURBINE METERS, AND SIX (6) 2" CONTROL VALVES AND STRAINERS.
7. TWO ETHANOL LOADING PUMPS, CENTRIFUGAL, 30-HP, EACH WITH DOUBLE MECHANICAL SEALS, COMMON TO LOADING RACK NO. 2.
8. TWO ETHANOL UNLOADING PUMPS, CENTRIFUGAL, 25 HP, EACH WITH DOUBLE MECHANICAL SEALS, COMMON TO LOADING RACK NO. 2.

Conditions:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[RULE 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[RULE 204]

3. The operator shall limit the loading rate of gasoline, (gasoline as defined in South Coast AQMD Rule 462) to no more than 1,138,000 gallons per day in direct mode and no more than 432,520 gallons per day in bypass mode. Bypass mode is defined as the operation of the carbon adsorber where the vapor flow "bypasses" the vapor holder/bladder tank. The limit(s) shall apply to the total combined loading rate for Loading Racks Nos. 1 and 2.
[RULE 1303(b)(2) – OFFSETS, 1313(g)-EMISSION LIMITATION, 462]

4. The following BACT requirements shall apply to new VOC service fugitive components associated with all the devices that are covered by this Permit to Construct. All valves shall be bellow-seal valves except in the following applications: valves in heavy liquid service, control valves, instrument piping/tubing valves, valves requiring torsional stem motion, situations where valve failure could pose safety hazard (e.g., drain valves with stems in the horizontal position), retrofit/special application valves with space limitation, and valves not commercially available. The South Coast AQMD shall approve all exceptions to this requirement. All valves and new major components shall be physically identified in the field with special markings that distinguish the components from non-BACT components. Additionally, all new components shall be identified as BACT components in the record.

   All fugitive components in VOC service, except those specifically exempted in rule 1173, shall be inspected monthly using EPA Reference Method 21

   All components in VOC service, with a leak greater than 500 ppm but less than 1,000 ppm measured as methane above background using EPA Reference Method 21, shall be repaired within 14 days of detection, a leak of 1,000 ppm or greater shall be repaired according to Rule 1173.

   The operator may revert to a quarterly inspection upon South Coast AQMD approval, after two consecutive months of inspections in which only two percent or less of the fugitive components are detected to leak over 500 ppmv above background.

   The records of the monthly inspection, subsequent repairs and reinspections, if any, shall be maintained for two years in a format approved by the South Coast AQMD, and shall be made available to South Coast AQMD personnel upon request.
   [RULE 1303(a)(1) – BACT, 1303(b)(2)-OFFSETS, 1313(g)-EMISSION LIMITATION]

5. The operator shall not operate this equipment unless it is vented to air pollution control equipment which is in full use and which has been issued a Permit to Operate by the South Coast AQMD.
   [RULE 462, 1303(a)(1) - BACT, 1303(b)(2) – OFFSETS, 40CFR60 SUBPART XX]

6. In addition to the records required in Rule 462, the loading throughput record shall be maintained for five years in a format approved by the South Coast AQMD, and shall be made available to South Coast AQMD personnel upon request.
   [RULE 462]

Periodic Monitoring: None

Emissions and Requirements:

7. This equipment is subject to the applicable requirements of the following rules and regulations:

TOC/VOC:	35 mg/l, 40 CFR 60 Subpart XX
VOC:	0.08 Lbs/1000 Gal, Rule 462

PERMIT TO OPERATE

Permit No. G8247
A/N 393492

Equipment Description:

GASOLINE BULK LOADING RACK NO. 2 CONSISTING OF:

1. SIX BOTTOM LOADING ASSEMBLIES WITH DRY-BREAK CONNECTION.
2. SIX PRODUCT METERS.
3. TWO VAPOR RECOVERY ARMS.
4. FOUR LOADING PUMPS (TWO STANDBY), 40-HP EACH.
5. TWO LOADING PUMPS (ONE STANDBY), 75-HP EACH.
6. ONE ETHANOL METERING SKID CONSISTING OF SIX (6) 1.5" TURBINE METERS, AND SIX (6) 2" CONTROL VALVES AND STRAINERS.
7. TWO ETHANOL LOADING PUMPS, CENTRIFUGAL, 30 HP, EACH WITH DOUBLE MECHANICAL SEALS, COMMON TO LOADING RACK NO. 1.
8. TWO ETHANOL UNLOADING PUMPS, CENTRIFUGAL, 25 HP, EACH WITH DOUBLE MECHANICAL SEALS, COMMON TO LOADING RACK NO. 1.

Conditions:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[RULE 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[RULE 204]

3. The operator shall limit the loading rate of gasoline, (gasoline as defined in South Coast AQMD Rule 462) to no more than 1,138,000 gallons per day in normal mode and no more than 432,520 gallons per day in bypass mode. Bypass mode is defined as the operation of the carbon adsorber where the vapor flow "bypasses" the vapor holder/bladder tank. The limit(s) shall apply to the total combined loading rate for Loading Racks Nos. 1 and 2.
[RULE 1303(b)(2) – OFFSETS, 1313(g)-EMISSION LIMITATION, 462]

4. The following BACT requirements shall apply to new VOC service fugitive components associated with all the devices that are covered by this Permit to Construct. All valves shall be bellow-seal valves except in the following applications: valves in heavy liquid service, control valves, instrument piping/tubing valves, valves requiring torsional stem motion, situations where valve failure could pose safety hazard (e.g., drain valves with stems in the horizontal position), retrofit/special application valves with space limitation, and valves not commercially available. The South Coast AQMD shall approve all exceptions to this requirement. All valves and new major components shall be physically identified in the field with special markings that distinguish the components from non-BACT components. Additionally, all new components shall be identified as BACT components in the record.

   All fugitive components in VOC service, except those specifically exempted in Rule 1173, shall be inspected monthly using EPA Reference Method 21.

   All components in VOC service, with a leak greater than 500 ppm but less than 1,000 ppm measured as methane above background using EPA Reference Method 21, shall be repaired within 14 days of detection, a leak of 1,000 ppm or greater shall be repaired according to Rule 1173.

   The operator may revert to a quarterly inspection upon South Coast AQMD approval, after two consecutive months of inspections in which only two percent or less of the fugitive components are detected to leak over 500 ppmv above background.

   The records of the monthly inspection, subsequent repairs and reinspections, if any, shall be maintained for two years in a format approved by the South Coast AQMD, and shall be made available to South Coast AQMD personnel upon request.
   [RULE 1303(a)(1) – BACT, 1303(b)(2)-OFFSETS, 1313(g)-EMISSION LIMITATION]

5. The operator shall not operate this equipment unless it is vented to air pollution control equipment which is in full use and which has been issued a Permit to Operate by the South Coast AQMD.
   [RULE 462, 1303(a)(1) - BACT, 1303(b)(2) – OFFSETS, 40CFR60 SUBPART XX]

6. In addition to the records required in Rule 462, the loading throughput record shall be maintained for five years in a format approved by the South Coast AQMD, and shall be made available to South Coast AQMD personnel upon request.
   [RULE 462]

Periodic Monitoring: NONE

Emissions and Requirements:

7. This equipment is subject to the applicable requirements of the following rules and regulations:

TOC/VOC:	35 mg/l, 40 CFR 60 Subpart XX
VOC:	0.08 Lbs/1000 Gal, Rule 462