



ZENITH ENERGY WEST COAST TERMINALS LLC

18000 Studebaker Rd., Suite 960  
Cerritos, CA 90703

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February 6, 2024

Sent via email to Josh Ewell

SCAQMD  
21865 Copley Drive  
Diamond Bar, CA 91765

**Subject: PAR 463 Comments**

Zenith Energy West Coast Terminals is pleased to submit the following comments to be considered while amending Rule 463.

New Definitions in section (b):

CLEANING is the process of washing or rinsing a stationary tank, reservoir, pipelines, or other container or removing vapor, sludge, or rinsing liquid from a stationary tank, reservoir, or other container.

REASON: This definition is verbatim from Rule 1149. It clarifies “cleaning”.

PRODUCT CHANGE is the process of changing the tank contents from one product to another product that has distinctive different characteristics i.e. vapor pressure, viscosity, etc

REASON: Clarification.

(d)(2) The roof of any internal or external floating roof tank shall float on the organic liquid at all times (i.e., free of the roof leg supports) except when the tank is being completely emptied for cleaning, ~~or repair~~, or a product change. The process of emptying or refilling, when the roof is resting on leg supports, shall be continuous.

REASON: Clarification.

(e)(3)(B) The primary and secondary seals shall be inspected by a certified person each time a floating roof tank is emptied and degassed. Gap measurements shall be performed on an external floating roof tank when the liquid surface is still but not more than 24 hours after the tank roof ~~is refloated~~ refloating operation has ceased.

REASON: For our operations, it may take longer than 24 hours to complete the refill event. For instance, a vessel may unload its contents into one of our larger tanks which may take upto 48 hours. Currently, we stop the vessel from unloading, wait until roof is still, perform the seal inspection, and then the vessel can resume unloading operations to fill the tank. Therefore, the vessel is stagnant in the port for a minimum of an extra 4 hours emitting auxiliary emissions.



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(e)(3)(C) The Executive Officer shall be notified in writing or electronically at least 2 days ~~2-weeks~~ prior to the start of any tank-emptying or roof-refloating operation for planned maintenance of a tank.

REASON: Clarification and 2 days is more in line with other rule notifications (i.e. 1149). Electronic notification reduces paper and is more environmentally friendly.

(f)(1)(C) If a tank is determined to be in violation of the requirements of this rule, a written report shall be submitted electronically to the Executive Officer within 120 hours of the determination of non-compliance, indicating corrective actions taken to achieve compliance.

REASON: Clarification. Electronic notification reduces paper and is more environmentally friendly.

(f)(2)(A) An owner or operator shall provide emissions information, to the Executive Officer upon request, based on the parameters listed in Attachment C using AQMD's Annual Emissions Reporting Program, AP-42, or U.S. EPA's most recent version of TANKS 4.0 Program. The requirement shall apply to all organic liquid storage tanks without regard to exemptions specified in subdivision (g).

REASON: Clarification - AER reporting allows for AP-42 calculations.

QUESTION: Is USEPA TANKS still valid since it is not supported by USEPA?

Thank you for considering these comments.

If you have any questions, please contact me at (562) 233-5370.

Thank you for your assistance.

Sincerely,

CM Cunningham, PE  
HSER Manager