



CHEMTRADE

January 29, 2021

Director of Compliance and Enforcement
Attention: Title V Reports
Bay Area Air Quality Management District
375 Beale Street #600
San Francisco, CA 94105

TV Tracking #: 143

1. RECEIVED IN 01/29/2021
ENFORCEMENT: _____

Re: Chemtrade West US LLC – Richmond, Facility #A0023

Title V Semiannual Report – Q3/Q4 2020

To Whom It May Concern:

Please find enclosed the corrected semiannual monitoring report for Chemtrade West US LLC – Richmond for the reporting period of July 1, 2020 – December 31, 2020.

There were two instances of permit non-compliance during this time period. On November 5, 2020 the site unloaded a rail car without properly venting the system to the sites A-4/A-5 abatement unit as required by permit condition 12051. On December 3rd the site experienced a visible emissions stack event for 7 minutes. The site was issued NOV Numbers A59546 and A59905 for these issues.

Attached are semi-annual throughputs for this reporting period.

If you should have any questions, please contact Andrew Hornbeck, EH&S Supervisor, at (510) 232-7193 x224.

Sincerely yours,

Mike Shepherd
Plant Manager
Chemtrade West US LLC – Richmond

cc: Director of the Air Division
USEPA, Region IX
Attention: Air - 3
75 Hawthorne Street
San Francisco, CA 94105

Compliance Certification

Based on information and belief formed after reasonable inquiry, the statements and information in the attached Data Update form are true, accurate, and complete.

Mike Shepherd
Name of Responsible Official


Signature

Certification Period: July 1, 2020 through December 31, 2020

01/29/2021
Date

Facility A0023
Chemtrade West, US LLC
525 Castro Street
Richmond, CA 94801

Chemtrade West US LLC
Richmond Works- Facility #A0023
Title V - Semi Annual Monitoring Report
Period: 07/01/20 - 12/31/20

Source	Pollutant	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Results		
S-1 Sulfuric Acid Mfg.	SO ₂	SIP 9-1-308.2	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 300 ppmv @ 12% O ₂	SIP 9-1-502	C	CEM	07/01/20 - 12/31/20 Submitted monthly via CEM reports.		
	SO ₂	BAAQMD Regulation 9-1-309	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 300 ppmv @ 12% O ₂	SIP 9-1-502	C	CEM	07/01/20 - 12/31/20 Submitted monthly via CEM reports.		
	Acid Mist	BAAQMD Regulation 12-6-301	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 0.15 g/kg (0.3 lb/ton) of acid produced	BAAQMD Condition # 14980	P/A	Source Test	Source test performed on September 18, 2020 and results submitted to BAAQMD.		
S-9 Process Air Heater	NOx, CO, VOC, PM10	BAAQMD Condition# 7934 Part 2	Fuel consumption shall not exceed 61.3 million cubic feet / 12 month period	BAAQMD Condition# 7934 Part 3	P/M	Monthly Records	Jul	3,138	mscf
							Aug	2,816	mscf
							Sep	2,725	mscf
							Oct	0,768	mscf
							Nov	0,000	mscf
							Dec	2,308	mscf
S-15 Startup Air Heater	NOx, CO, VOC, PM10	BAAQMD Condition# 7606 Part 2	Fuel consumption shall not exceed 5,000,000 cubic feet / 12 month period	BAAQMD Condition# 7606 Part 2	P/M	Monthly Records	Jul	-	scf
							Aug	18,121	scf
							Sep	28,691	scf
							Oct	-	scf
							Nov	-	scf
							Dec	80,110	scf

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Source	Pollutant	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Results	
S-16 Alkylation Storage Tank # 13	VOC, PM10	BAAQMD Condition# 13215 Part 1	Throughput shall not exceed 146,000 ton / 12 month period	BAAQMD Condition# 13215 Part 1	P/M	Monthly Records	Jul 0 tons	
							Aug 0 tons	
							Sep 0 tons	
							Oct 0 tons	
							Nov 0 tons	
							Dec 0 tons	
S-24 Elec. Grade Sulfuric Acid Mfg.	SO ₂	BAAQMD Regulation 9-1-309	Gaseous emissions from any source at an H ₂ SO ₄ plant shall not exceed 300 ppmv @ 12% O ₂	SIP 9-1-502	C	CEM	07/01/20 - 12/31/20 Submitted monthly via CEM reports.	
							Jul 56 tons	
							Aug 16 tons	
							Sep 0 tons	
							Oct 0 tons	
							Nov 0 tons	
							Dec 0 tons	
S-32 Alkylation Storage Tank # 14	VOC, PM10	BAAQMD Condition# 13889 Part 2	Throughput shall not exceed 219,000 ton / 12 month period	BAAQMD Condition # 13889 Part 3	P/M	Monthly Records	Jul 0 tons	
							Aug 0 tons	
							Sep 0 tons	
							Oct 0 tons	
							Nov 0 tons	
							Dec 0 tons	

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Source	Pollutant	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Results
S-36 Process Air Heater	NOx, CO, POC	BAAQMD Condition# 20509 Part 3, 40 CFR 63 , Subpart ZZZZ	Gaseous emissions shall not exceed NOX 0.15 g/bhp-hr, CO 0.6 g/bhp-hr, POC 0.15 g/bhp-hr , 47 ppmv CO	BAAQMD Condition# 20509 Part 4, 40 CFR 63 , Subpart ZZZZ	P	Bi-annual Source Test	Source began operation in June 13, 2019. Source test conducted and submitted to air district. All results within allowable limits
S-36 Process Air Heater	Temperature and Pressure	N/A	Maintain Temperature between 450F and 1350F, Maintain catalyst so pressure drop does not change by more than 2 inches of water	40 CFR 63 Subpart ZZZZ	C	Continuous	Temperature and pressure gauges installed prior to start-up

