



**CHEMTRADE**

TV Tracking #: 666

January 30, 2023

1.  RECEIVED IN ENFORCEMENT: 01/31/2023

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

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

**Title V Semiannual Report – Q3/Q4 2022**

To Whom It May Concern:

Please find enclosed the semiannual monitoring report for Chemtrade West US LLC – Richmond for the reporting period of July 01, 2022 – December 31, 2022.

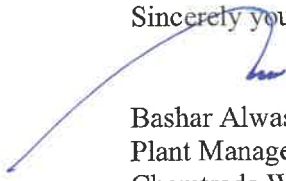
There were two instances of possible permit deviation during this time period:

1. On November 9, 2022, site personnel noticed a sulfur dioxide (SO<sub>2</sub>) odor around the plant. Over the next several days, handheld SO<sub>2</sub> monitors were used to determine the source of the odor. Concentrations of SO<sub>2</sub> were measured up to approximately 1.5 parts per million (ppm) at ground level within the facility. On November 16, 2022, it was determined that the most likely source of this SO<sub>2</sub> was from the start-up preheater stack. Site personnel, using a handheld device, found elevated SO<sub>2</sub> readings at the preheater stack (S-15) that exceeded the 20 ppm span max of the portable analyzer. S-15 was taken offline at 8:30 AM on November 17, 2022, out of an abundance of caution. A breakdown notification was submitted to the BAAQMD on November 18, 2022. A 10-Day Deviation Report was submitted to the BAAQMD on November 28, 2022. No offsite odor complaints were received during this incident.
2. During a morning maintenance field inspection on December 30, 2022, site personnel discovered the start-up preheater appeared to be pressurized despite not operating, indicating the possibility of an SO<sub>2</sub> leak. A field evaluation was conducted immediately in the preheater area from 8:30-8:40am, and the supervisor and Plant Manager were notified. A handheld monitor was used to record SO<sub>2</sub> concentrations, and readings ranged between 1.2-2.4 ppm in the preheater area. After further inspection, it was determined the Damper valve was partially open and the maintenance personnel were not able to fully close it. As a result, the plant was shut down at 9:41 AM. No measured exceedances of the sulfuric acid plant SO<sub>2</sub> limit of 300 ppm at 12% O<sub>2</sub> in BAAQMD Regulation 9-1-309 occurred as a result of this event. However, out of an abundance of caution, Chemtrade reported this event to BAAQMD as a breakdown, and submitted a 10-day Deviation report citing BAAQMD Regulation 9-1-309.

Attached are semi-annual throughputs for this reporting period.

If you should have any questions, please contact Cris Parson, EH&S Regional Manager, at (409) 363-9294.

Sincerely yours,



Bashar Alwash  
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.

Bashar Alwash  
Name of Responsible Official

  
Signature

Certification Period: July 1, 2022 through December 31, 2022.

01/31/2023  
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: 07/01/22 - 12/31/22**

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 <sub>2</sub>	SIP 9-1-308.2	Gaseous emissions from any source at an H <sub>2</sub> SO <sub>4</sub> plant shall not exceed 300 ppmv @ 12% O <sub>2</sub>	SIP 9-1-502	C	CEM	6/30/2022 - 12/31/2022 Submitted monthly via CEM reports.
	SO <sub>2</sub>	BAAQMD Regulation 9-1-309	Gaseous emissions from any source at an H <sub>2</sub> SO <sub>4</sub> plant shall not exceed 300 ppmv @ 12% O <sub>2</sub>	SIP 9-1-502	C	CEM	6/30/2022 - 12/31/2022 Submitted monthly via CEM reports.
	Acid Mist	BAAQMD Regulation 12-6-301	Gaseous emissions from any source at an H <sub>2</sub> SO <sub>4</sub> 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 12/19/2022 and results were submitted to BAAQMD.
S-9 Process Air Heater	NO <sub>x</sub> , 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 2,678 mscf
							Aug 2,668 mscf
							Sep 2,681 mscf
							Oct 2,503 mscf
							Nov 2,440 mscf
Dec 3,121 mscf							
S-9 Process Air Heater	NO <sub>x</sub> , CO	BAAQMD Regulation 9-7- 307.3	Gaseous emissions shall not exceed NO <sub>x</sub> 15 ppmv (dry @3% O <sub>2</sub> ) and CO 400 ppmv (dry @3% O <sub>2</sub> )	BAAQMD Regulation 9-7- 506	P	Annual Source Test	Source test completed 12/19/22. The final report
S-15 Startup Air Heater	NO <sub>x</sub> , 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 46,934 scf
							Aug 0,000 scf
							Sep 35,399 scf
							Oct 288,652 scf
							Nov 245,892 scf
Dec 171,617 scf							
S-15 Process Air Heater	NO <sub>x</sub> , CO	BAAQMD Regulation 9-7- 307.3	Gaseous emissions shall not exceed NO <sub>x</sub> 15 ppmv (dry @3% O <sub>2</sub> ) and CO 400 ppmv (dry @3% O <sub>2</sub> )	BAAQMD Regulation 9-7- 506	P	Annual Source Test	Source test completed 12/28/22. Results were submitted to air district and were below all applicable limits.

**Chemtrade West US LLC**  
**Richmond Works- Facility #A0023**  
**Title V - Semi Annual Monitoring Report**  
**Period: 07/01/22 - 12/31/22**

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 <sub>2</sub>	SIP 9-1-308.2	Gaseous emissions from any source at an H <sub>2</sub> SO <sub>4</sub> plant shall not exceed 300 ppmv @ 12% O <sub>2</sub>	SIP 9-1-502	C	CEM	6/30/2022 - 12/31/2022 Submitted monthly via CEM reports.
	SO <sub>2</sub>	BAAQMD Regulation 9-1-309	Gaseous emissions from any source at an H <sub>2</sub> SO <sub>4</sub> plant shall not exceed 300 ppmv @ 12% O <sub>2</sub>	SIP 9-1-502	C	CEM	6/30/2022 - 12/31/2022 Submitted monthly via CEM reports.
		BAAQMD Condition# 13507 Part 1	Production shall not exceed 15,000 ton / 12 month period	BAAQMD Condition# 13507 Part 3	P/M	Monthly Records	Jul 0 tons Aug 0 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
S-36 Natural-Gas Fired IC Engine	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 test last conducted on June 25, 2021. Results were submitted to air district and were below all applicable 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 differential pressure instruments installed and data continuously recorded on DCS. Due to a maintenance issue that Chemtrade is working to resolve, during parts of November and December, the differential pressure monitor was recording incorrect data. However, at this time there are no indications that the catalyst pressure drop has changed by more than 2 inches of water from the initial performance test.