



CHEMTRADE

January 28, 2022

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 #: 379

1. RECEIVED IN ENFORCEMENT: 01/28/2022

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

Title V Semiannual Report – Q3/Q4 2021

To Whom It May Concern:

Please find enclosed the semiannual monitoring report for Chemtrade West US LLC – Richmond for the reporting period of July 1, 2021 – December 31, 2021.

There was one instance of possible permit deviation during this time period:

- During a power failure to the plant distributed control system (DCS), process control to a boiler and other process equipment was temporarily lost. While shutting the boiler down manually due to safety the ECS (A-6) pH temporarily dropped below 8.5 and thus outlet gas SO₂ ppm may have temporarily exceeded permit limits from Condition #20580 part 2. Once the operator became aware of the situation the operation of the ECS was corrected.

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,

Michael Shepherd

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

Michael Shepherd
Signature

Certification Period: July 1, 2021 through December 31, 2021

01/28/2022
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: 07/01/21 - 12/31/21

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	07/01/21 - 12/31/21 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	07/01/21 - 12/31/21 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 23rd and 24th, 2021 and results were 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	July 3,129 mscf Aug 2,987 mscf Sept 2,948 mscf Oct 68 mscf Nov 2,109 mscf Dec 2,804 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	July 0 scf Aug 16,414 scf Sept 30,281 scf Oct 4,274 scf Nov 237,399 scf Dec 9,169 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	July 1,312 tons
							Aug 1,202 tons
							Sept 1,069 tons
							Oct 185 tons
							Nov 0 tons
							Dec 1,009 tons
S-24 Elec. Grade 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	07/01/21 - 12/31/21 Submitted monthly via CEM reports.
							BAAQMD Regulation 9-1-309
		BAAQMD Condition# 13507 Part 1	Production shall not exceed 15,000 ton / 12 month period	BAAQMD Condition# 13507 Part 3	P/M	Monthly Records	July 0 tons Aug 0 tons Sept 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	July 1,312 tons
							Aug 1,202 tons
							Sept 1,069 tons
							Oct 185 tons
							Nov 0 tons
							Dec 1,009 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 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 began operation in June 13, 2019 and was tested at start-up. Results were submitted to Air District and were below all applicable limits. 2021 source test 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 pressure gauges installed prior to start-up