CHEMTRADE

TV Tracking #1283 (Semi-Annual)

1. ☐ RECEIVED IN ENFORCEMENT: 01/26/2026

January 23, 2026

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

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

Title V Semiannual Report – Q3/Q4 2025

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, 2025 – December 31, 2025.

There were no instances of permit deviations during this time period.

Attached are semi-annual throughputs for this reporting period.

If you should have any questions, please contact Bashar Alwash, Plant Manager, at (510) 447-0453.

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, 2025 through December 31, 2025.

01/23/2026
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: 07/01/25 - 12/31/25

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_2SO_4 plant shall not exceed 300 ppmv @ 12% O_2	SIP 9-1-502	C	CEM	7/01/2025 - 12/31/2025 Submitted monthly via CEM reports.
	SO_2	Air District Regulation 9-1-309	Gaseous emissions from any source at an H_2SO_4 plant shall not exceed 300 ppmv @ 12% O_2	SIP 9-1-502	C	CEM	7/01/2025 - 12/31/2025 Submitted monthly via CEM reports.
	Acid Mist	Air District Regulation 12-6-301	Gaseous emissions from any source at an H_2SO_4 plant shall not exceed 0.15 g/kg (0.3 lb/ton) of acid produced	Air District Condition # 14980	P/A	Source Test	Source test completed on 2/21/2025. The report has been submitted by Best Environmental.
S-9 Process Air Heater	NOx, CO, VOC, PM10	Air District Condition# 7934 Part 2	Fuel consumption shall not exceed 61.3 million cubic feet / 12 month period	Air District Condition# 7934 Part 3	P/M	Monthly Records	Jul 3,448 mscf Aug 3,750 mscf Sep 3,546 mscf Oct 3,591 mscf Nov 2,845 mscf Dec 3,660 mscf
S-9 Process Air Heater	NOx, CO	Air District Regulation 9-7-307.3	Gaseous emissions shall not exceed NOX 15 ppmv (dry @3% O2) and CO 400 ppmv (dry @3% O2)	Air District Regulation 9-7-506	P	Annual Source Test	Source test completed 12/16/25. The report will be submitted by Best Environmental.
S-15 Startup Air Heater	NOx, CO, VOC, PM10	Air District Condition# 7606 Part 2	Fuel consumption shall not exceed 5,000,000 standard cubic feet / 12 month period	Air District Condition# 7606 Part 2	P/M	Monthly Records	Jul 20 scf Aug 395,280 scf Sep 284,615 scf Oct 165,650 scf Nov 432,868 scf Dec 227,394 scf
S-15 Startup Air Heater	NOx, CO	Air District Regulation 9-7-307.3	Gaseous emissions shall not exceed NOX 15 ppmv (dry @3% O2) and CO 400 ppmv (dry @3% O2)	Air District Regulation 9-7-506	P	Annual Source Test	Source test completed 12/16/25. The report will be submitted by Best Environmental.

Chemtrade West US LLC
Richmond Works- Facility #A0023
Title V - Semi Annual Monitoring Report
Period: 07/01/25 - 12/31/25

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	Air District Condition# 13215 Part 1	Throughput shall not exceed 146,000 ton / 12 month period	Air District 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	SIP 9-1-308.2	Gaseous emissions from any source at an H_2SO_4 plant shall not exceed 300 ppmv @ 12% O_2	SIP 9-1-502	C	CEM	7/01/2025 - 12/31/2025 Submitted monthly via CEM reports.
	SO_2	Air District Regulation 9-1-309	Gaseous emissions from any source at an H_2SO_4 plant shall not exceed 300 ppmv @ 12% O_2	SIP 9-1-502	C	CEM	7/01/2025 - 12/31/2025 Submitted monthly via CEM reports.
		Air District Condition# 13507 Part 1	Production shall not exceed 15,000 ton / 12 month period	Air District 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	Air District Condition# 13889 Part 2	Throughput shall not exceed 219,000 ton / 12 month period	Air District 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	Air District 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	Air District 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. Unit is not in operation as of early February 2023. S-36 fuel source has been blinded and the unit has been locked-out prior to the source test. As a result, no additional source test(s) have been completed. Application to permanently remove the source from the process has been sent to the district. The source has been removed from the Air District Permit to Operate and is pending removal from the Title V permit.
S-36 Natural-Gas Fired IC Engine	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	See above