CHEMTRADE

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BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

January 17, 2020

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 2019

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, 2019 – December 31, 2019.

There was one instance of permit deviation during this time period. The site had 8 days without a proper daily calibration for the Oxygen CEMS as reported on 10/3/19.

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, 2019 through December 31, 2019

01/17/2020
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: 07/01/19 - 12/31/19

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	07/01/19 - 12/31/19 Submitted monthly via CEM reports.
	SO_2	BAAQMD 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	07/01/19 - 12/31/19 Submitted monthly via CEM reports.
	Acid Mist	BAAQMD 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	BAAQMD Condition # 14980	P	Source Test	Source test performed on August 27, 2019. Results were submitted to Source Test and Enforcement Division and are within limits.
	O2	BAAQMD Regulation 1-1-522.5	Daily CEMS Calibration	BAAQMD Regulation 1-1-522.5	P	CEM	Site had 8 days of missed O2 monitor calibrations as reported on 10/3/19
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 3.604 mscf Aug 3.268 mscf Sep 1.4 mscf Oct 3.254 mscf Nov 3.515 mscf Dec 3.477 mscf

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Source	Pollutant	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Results
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 16,515 scf Aug 25,617 scf Sep 91,455 scf Oct 35,006 scf Nov 56,415 scf Dec 18,211 scf
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 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	07/01/19 - 12/31/19 Submitted monthly via CEM reports.
	SO_2	BAAQMD 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	07/01/19 - 12/31/19 Submitted monthly via CEM reports.

Chemtrade West US LLC
Richmond Works- Facility #A0023
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Source	Pollutant	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Monitoring Results
		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 24 tons Aug 534 tons Sep 150 tons Oct 473 tons Nov 595 tons Dec 404 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 0 tons Aug 0 tons Sep 0 tons Oct 0 tons Nov 0 tons Dec 0 tons
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 test conducted 6/23/19 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