

**Engineering Evaluation Report
New Source Review (NSR) Application #31964
Synthetic Minor Operating Permit Revision Application #710879
Kinder Morgan Liquids Terminal – Richmond Products Terminal
1306 Canal Street, Richmond CA 94804
Site #23438 (Formerly #13637)**

Background

This NSR Application (#31964) was submitted as a result of Notice of Violation #A61737 at S-1 and S-26 for exceeding the condition limit of 624,000 gallons/year of Transmix in the past 3 years. Corresponding alterations to Kinder Morgan Liquids Terminal - Richmond Products Terminal's (KMLT's) Synthetic Minor Operating Permit (SMOP) will be submitted to the United States EPA and CARB as part of SMOP Revision Application #710879. Both of these applications will be evaluated using this evaluation report and final actions will be taken on them together.

KMLT has applied for an alteration permit to operate (PTO) and change of conditions to their SMOP for the following equipment:

- S-1** Multi-liquid Truck Loading Rack for Gasoline & Diesel Fuel; 16 total arms (6 permitted gasoline, 1 permitted transmix, 1 permitted ethanol, 1 permitted gasoline additive, 4 exempt diesel/biodiesel, 2 exempt renewable diesel/biodiesel, and 1 exempt biodiesel)
Abated by: A-1
- A-1** Vapor Adsorption System; Make: John Zink, Model: Series 2000, Filter Material: Activated Carbon/Charcoal
- S-26** External Floating Roof Tank, 311K gal, White, Gasoline, unleaded (TANK NO. 26)

KMLT is submitting this application package to request the following changes to the facility PTO and SMOP:

1. Increase the permitted throughput in Condition 19942 Part 4 for Tank 26 (S-26), an external floating roof storage tank storing Transmix, from 624,000 to 3,000,000 gallons per year (increase of 2,376,000 gallons/year); and decrease the permitted gasoline at other tanks (S-4, S-6, S-10, S-13, S-14, S-11, S-27 to S-30 & S-51) from 1,785,355,721 to 1,782,979,721 gallons per year to offset the increase; and
2. Increase the permitted Transmix throughput in Condition 19942 Part 4 of the Loading Rack (S-1) from 624,000 gallons to 3,000,000 gallons per year; and decrease the permitted gasoline at the S-1 loading rack from 247,000,000 to 244,624,000 gallons per year to prevent an increase in permitted emissions.

Transmix is the industry term for the interface mixture of fuel products during the transportation of different fuel products through a common pipeline. The resulting mixture of gasoline, diesel fuel, or jet fuel no longer conforms to the required specifications for any single fuel product. Terminals store the resulting Transmix separately before sending back to refineries for re-processing into the original fuel products. For emissions calculation purposes, Transmix is based on the original permitted RVP10 (equivalent to gasoline) to represent the highest-emission scenario. Fuels are transported to the Richmond Products Terminal via railcar, pipeline, truck, and marine vessel.

Additionally, the facility has elected to balance the potential emissions due to the increase in Transmix throughput through S-26 and their loading rack (S-1) via a corresponding decrease in gasoline throughput. As detailed below, the requested permit changes contained in these applications meet the definition of a permit alteration per Regulation 2-1-233:

To make any physical change, change in the method of operation, or other similar change at an existing source that may affect air pollutant emissions and that does not qualify as a modification under the criteria set forth in Section 2-1-234.

Per Regulation 2-1-234, a modification is any physical change, change in method of operation, change in throughput or production, or other similar change at an existing source, that results in an increase in potential to emit or a significant increase over actual emissions baseline (a “major modification”). The change in transferring and storing materials with lower true vapor pressure (TVP) at sources S-1 and S-26 will not increase either source’s daily or annual PTE. Therefore, they are altered sources under Application #31964.

Further, KMLT is in compliance with the necessary requirements in Regulation 2, Rule 6 to obtain a modified synthetic minor permit. The facility has voluntarily accepted enforceable permit conditions including emission limits that will keep its annual emissions within 95 tons per year of any regulated air pollutant, 9 tons of any hazardous air pollutant, and 23 tons of any combination of hazardous air pollutants.

This revision to the synthetic minor conditions will allow the facility to continue to operate under a SMOP. This synthetic minor operating permit covers all sources existing at this facility as of permit issuance. The facility has submitted Application #710879 to update the SMOP conditions in conjunction with Application #31964.

Emissions Calculations

The facility has been operating under a Synthetic Minor Operating Permit since October 22, 2002. The facility has practically enforceable emission limits (Condition 19942, Parts 1 and 2) that keep the potential to emit below 95 tons per year of any regulated air pollutant, below 9 tons per year of any single HAP, and below 23 tons per year of any combination of HAPs.

For the emissions calculations, both sources S-1 and S-26 are capable of operation for 24 hours a day, 365 days a year, resulting in 8,760 total hours of operation per year. This project will not result in the modification or addition or replacement of any fugitive components, and therefore fugitive emission calculations do not apply to these applications.

Tank 26 (S-26)

The emissions from S-26 due to the storage of Transmix have historically been modeled as RVP10 gasoline (True Vapor Pressure (TVP) of 5.4573 psia) as a worst-case scenario. To avoid an increase in emissions due to the increase in throughput from 624,000 to 3,000,000 gallons per consecutive 12-month period, KMLT has agreed to reduce the maximum TVP of the materials stored from 5.457 psia (RVP10) to 5.397 psia (RVP 9.9).

Basis:

- Emission calculation is based EPA AP-42 equations, Chapter 7.2 (June 2020) - TankESP program
- Maximum annual throughput = 3,000,000 gallons/year
- Baseline annual throughput = 624,000 gallons/year
- Maximum Historical daily throughput = 115,878 gallons/day (per KMLT daily records; 3/11/2020)
 - o Daily limits were never established in previous permitting efforts; historical max was utilized

Annual PTE Based on Transmix RVP

Tank S-26 Contents	True Vapor Pressure (psia)	Standing Losses ⁽¹⁾ (Rim Seal + Roof Fitting), lbs/yr	Working Losses, lbs/yr (624,000 Gals)	Working Losses, lbs/yr (3 MM Gals)	Total Losses, TPY (624,000 Gals)	Total Losses, TPY (3 MM Gals)
Transmix (RVP-9)	4.856	2,119.4	3.21	15.42	1.061	1.067
Transmix (RVP-9.5)	5.156	2,281.6	3.21	15.42	1.142	1.148
Transmix (RVP-9.9)	5.397	2,415.5	3.21	15.42	1.209	1.215 (2,430 lb/yr)
Transmix (RVP-10) (Baseline)	5.457	2,449.6	3.21	15.42	1.226 (2,452 lb/yr)	1.233

1. Standing losses for S-26 are independent of throughput and equivalent but are dependent upon vapor pressure as shown above.

Daily PTE Based on Historical Transmix Throughput

Tank S-26 Contents	True Vapor Pressure (psia)	Standing Losses (Rim Seal + Roof Fitting), lbs/day	Working Losses, lbs/day (115,878 Gals)	Total Losses, lbs/day (115,878 Gals)
Transmix (RVP-10) (permitted)	5.457	2,449.6/365= 6.71	217.35/365= 0.60	2,666.98/365= 7.31

Note: Daily estimates provided by scaling daily throughput to 42,295,470 gals/yr (daily max 115,878 gal/day X 365 days), then dividing the corresponding TankESP results by 365 days.

The facility has agreed to reduce their permitted gasoline throughput at Sources S-4, S-6, S-10, S-13, S-14, S-11, S-27 to S-30 & S-51 by the same amount corresponding to the increase in Transmix throughput at S-26. As both of these materials are modeled as gasoline and are transported by the same means, this is not expected to result in an increase in potential railcar or truck traffic; unloading capacity is unchanged by this project.

Daily and annual emission limits will be added to the existing permit conditions (Condition 19942; Parts 70-75) to document the emissions calculations above and limit the emission potential from S-26 going forward.

Loading Rack (S-1)

Loading rack emissions were calculated based on the permit limit (0.02 lbs of VOC per thousand gallons of product transferred; Part 15 of Condition #19942; BACT) multiplied by the total throughput of each material. The facility has agreed to reduce its permitted gasoline throughput in S-1 by an amount corresponding to the increase in Transmix throughput. As the emissions for both Transmix and Gasoline materials are calculated using the same emission factor, this will create a “no-net-increase” in the permitted emissions as shown in Tables 2a and 2b. Therefore, this permit action is an alteration since there will be no increase in the permitted emissions (daily/annual).

There will be no increase in permitted fugitive emissions associated with S-1. S-1 will retain the same total amount of permitted annual and daily throughput and emissions as permitted in the previous application (AN32039). Maximum daily/annual throughput/emissions limits are imposed in Permit Condition #19942 Parts 4, 17a, and b.

Table 2a: Summary of S-1 VOC Emissions (Annual)

Product	VOC Emission Factor (lbs/1000 gals)¹	Pre-Application Emissions			Post-Application Emissions		
		(gal/yr)	(lbs/yr)	(ton/yr)	(gal/yr)	(lbs/yr)	(ton/yr)
Transmix	0.02	624,000	12.48	0.006	3,000,000	60.00	0.030
Gasoline, Gasoline Additives	0.02	247,000,000	4940.00	2.470	244,624,000	4892.48	2.446
Ethanol	0.02	34,944,000	698.88	0.349	34,944,000	698.88	0.349
Diesel, Biodiesel, Renewable Diesel, and Jet A	0.0004	90,000,000	36.00	0.018	90,000,000	36.00	0.018
Total:	---	372,568,000	5,687	2.844	372,568,000	5,687	2.844

1. Based on AP-42 Chapter 5.2 equation for loading losses (July 2008) and assuming control efficiency of 99.11% and collection efficiency of 99.20% documented in AN1925. Permit Condition 19942 Part 15 addresses ongoing compliance demonstration with the emission factors above.

Table 2b: Summary of S-1 Maximum VOC Emissions (Daily/Hourly)

Product	Daily Throughput ² (gal/day)	VOC Emission Factor (lbs/1000 gals) ¹	Daily Emissions	
			(lbs/day)	(lbs/hr)
Transmix	7,808	0.02	0.16	0.01
Gasoline	874,831	0.02	17.50	0.73
Gasoline Additive	280	0.02	0.01	0.00
Ethanol	97,275	0.02	1.95	0.08
Diesel, Biodiesel, Renewable Diesel, and Jet A	29,120	0.0004	0.01	0.00
Total:	1,009,313	---	19.62	0.82

1. Based on AP-42 Chapter 5.2 equation for loading losses (July 2008) and assuming control efficiency of 99.11% and collection efficiency of 99.20% documented in AN1925. Permit Condition 19942 Part 15 addresses ongoing compliance demonstration with the emission factors above.
2. Note: Maximum daily throughputs based on historically high actual daily throughout achieved on 3/31/2022

Cumulative Increase

Table 3. Cumulative Emissions Increase, Post 4/5/91

Pollutant	Existing Emissions Post 4/5/91 (tons/year)	S-26 Increase (tons/year)	S-1 Increase (tons/year)	Cumulative Emissions (tons/year)
NO _x	17.891	0	0	17.891
POC	0.076	0	0	0.076
CO	0	0	0	0
PM10	0.01	0	0	0.01
PM2.5	0	0	0	0
SO ₂	0.002	0	0	0.002

Health Risk Assessment

This NSR permit application does not allow any increase in permitted hourly and/or annual toxic emissions; therefore, an HRA is not required per Regulation 2-5.

Best Available Control Technology

This proposed NSR application is for an alteration of the sources above and does not require BACT per Reg. 2-2.

Offsets

This proposed NSR application is for an alteration of the sources above and does not require Offsets per Reg. 2-2.

Statement of Compliance

This facility is in compliance with the SMOP Revision requirements found in Regulation 2, Rule 6-423.6 as the revisions comply with subsection 2-6-423.2 (below) and are in accordance with the requirements of Regulation 2, Rules 1 and 2 as discussed throughout this Engineering Evaluation. The facility has voluntarily accepted enforceable permit conditions including emission limits that will keep its annual emissions within 95 tons per year of any regulated air pollutant, 9 tons of any hazardous air pollutant, and 23 tons of any combination of hazardous air pollutants.

Per Regulation 2-6-423.2, the SMOP contains quantifiable and practically enforceable permit conditions limiting the facility's potential to emit to no greater than 95 tons per year of any regulated air pollutant, 9 tons per year of any single hazardous air pollutant, and 23 tons per year of any combination of hazardous air pollutants, and permit conditions requiring monitoring, recordkeeping, and reporting sufficient to determine compliance with such emission limits.

S-1: Loading Rack

Air District Rules and Regulations

S-1 is exempt from Regulation 8, Rule 6 per Regulation 8-6-115 (Exemption, Bulk Gasoline Distribution Facilities): Gasoline bulk terminals and bulk plants are not subject to the requirements of this rule. Such facilities are subject to the provisions of Regulation 8, Rules 33 or 39.

S-1 is subject to Regulation 8-33 (Gasoline Bulk Terminals and Gasoline Delivery Vehicles) and is expected to continue to comply with the operating requirements of Regulation 8-33, including:

- 8-33-301 (Gasoline Bulk Terminal Emission Limitations) – S-1 complies with the 0.04 pound (lb) per 1,000 gallons of organic liquid loaded limit via permit limit (0.02 lbs of VOC per thousand gallons of product transferred; Part 15 of Condition #19942; BACT).
- 8-33-303 (Bottom Fill Requirement) – S-1 is equipped with bottom fill equipment.
- 8-33-305 (Gasoline Bulk Terminal Maintenance and Repair) – S-1 equipment shall be maintained in good working order.
- 8-33-306 (Operating Practices) – S-1 shall not drain or spill liquid gasoline, discard it in sewers, store it in open containers, or handle it in any other manner that would result in its evaporation to the atmosphere.
- 8-33-307 (Loading Practices) – S-1 shall use compatible connectors during loading operations.
- 8-33-309 (Gasoline Bulk Terminal Vapor Recovery System Requirements) – S-1 is abated by A-1 (John Zink Vapor Recovery System)
- 8-33-403 (Bulk Terminal Monitoring, Inspection, Notification and Reporting Requirements) – S-1 is included in KMLT's monitoring, inspection, notification and reporting plan.

S-1 complies with the annual source testing requirements of 8-33-503 and general recordkeeping requirements of Regulation 8-33.

S-1 is not subject to Regulation 8 Rule 39 as KMLT is a Bulk Terminal (loading capacity greater than 600,000 gallons of gasoline on a facility-wide basis), not a Bulk Plant. S-1 is subject to Regulation 8-33, which covers bulk terminals.

New Source Performance Standards (NSPS)

Gasoline bulk terminals and bulk plants are subject to NSPS Subpart XX—Standards of Performance for Bulk Gasoline Terminals. S-1 is expected to continue to comply with the Standards of Subpart XX (§60.502) through the use of A-1 and Permit Condition #19942 Part 15 (0.02 lbs of VOC per thousand gallons of product transferred).

S-26: Storage Tank (External Floating Roof Tank)

Air District Rules and Regulations

Storage tanks are subject to the requirements of Regulation 8-5 (Storage of Organic Liquids):

- 8-5-301 (Storage Tanks Control Requirements) – S-26 complies with the external floating roof requirements for tanks larger than or equal to 39,626 gallons containing organic contents with a TVP between 1.5 and 11 psia.
- 8-5-304 (Requirements for External Floating Roof Tanks) – S-26 complies with the requirements for External Floating Roof Tanks including fittings, primary and secondary seals.
- 8-5-320 (Floating Roof Tank Fitting Requirements) – S-26 complies with all requirements including gasket covers, slotted sampling and gauging wells, and organic vapor reduction.

- 8-5-321 (Primary Seal Requirements) – S-26 complies with the metallic shoe requirements and continued compliance will be verified by C&E.
- 8-5-322 (Secondary Seal Requirements) – S-26 complies with the seal gap requirements and continued compliance will be verified by C&E.
- 8-5-328 (Tank Degassing Requirements) – S-26 complies with at least 90% control efficiency by weight during tank degassing.
- 8-5-331 (Tank Cleaning Requirements) – S-26 complies with at least 90% control efficiency by weight during tank degassing.
- 8-5-401 (Inspection Requirements for External Floating Roof Tanks) – S-26 complies with the twice per year inspection requirements.
- 8-5-403 (Inspection Requirements for Pressure Relief Devices) – S-26 complies with the twice per year inspection requirements.
- 8-5-501 (Records) – S-26 complies with the record keeping requirements per Part 75 of the SMOP condition.

As this is an alteration application, S-26 is expected to continue to comply with these requirements.

New Source Performance Standards (NSPS)

S-26 is not subject to the NSPS Subpart Kb (Volatile Organic Liquid Storage Vessels Including Petroleum Storage Vessels) as it was installed in 1973 with no modifications after July 23, 1984.

California Environmental Quality Act (CEQA)

These permit decisions are not subject to CEQA because the Air District's evaluation is a ministerial action (Public Resources Code § 21080(b)(1) and CEQA Guidelines § 15268(a)) conducted using the fixed standards and objective measurements outlined in standard air permitting/engineering reference materials including, but not limited to: permitting handbooks, permitting manuals, permitting guidance documents, source test/lab sampling results, and emissions factor clearinghouses. In addition, because S-1 and S-26 are altered and not new or modified, neither a Best Available Control Technology (BACT) determination nor a BACT for toxics (TBACT) determination is required. The Air District was legally compelled to approve these applications given the relevant requirements were objectively met based on the information available to the Air District. Thus, the Air District's approval is ministerial and not subject to CEQA.

The Air District will file a Notice of Exemption with the County Clerk and the State CEQA Clearinghouse.

Prevention of Significant Deterioration (PSD)

PSD does not apply to this NSR application.

School and OBC Notifications (Regulation 2-1-412)

S-1 and S-26 are not located within 1,000 feet of the outer boundary of a K-12 school site. S-1 and S-26 are located within an OBC, but this NSR application does not trigger a Health Risk Assessment. Therefore, S-1 and S-26 are not subject to the public notification requirements of Regulation 2-1-412.

Permit Conditions

Synthetic Minor Condition #19942, Plant #23438 (Formerly #13637), Application #1925, Amended by Application #7082, Amended by Application #9714, Amended by Application #14472, Amended by Application #32039, Amended by Application #31964:

Asterisks denote permit conditions that are part of this permit but do not contribute to establishing the synthetic minor limits. The facility must comply with all conditions, regardless of asterisks. The following conditions do not negate the applicability of any Air District, state or federal requirements.

1. Annual emissions of volatile organic compounds (VOCs) from all sources combined (including any truck loading, storage tanks, oil/water separator and marine loading/offloading operations) shall be no greater than 95 tons per any consecutive twelve-month period. (Basis: Synthetic Minor)
2. Annual emissions of any single hazardous air pollutant (HAP) from all sources combined (including any truck loading, storage tanks, oil/water separator and marine loading/offloading operations) shall be no greater than 9 tons per any consecutive twelve-month period. (Basis: Synthetic Minor)
3. Annual emissions of any combination of HAPs from all sources combined (including any truck loading, storage tank, Oil/Water Separator and Marine loading/Offloading operations) shall be no greater than 23 tons per year. (Basis: Synthetic Minor)
4. The total throughput at each source listed below shall not exceed the gallons indicated in any rolling 12 consecutive month period, as indicated: (Basis: Synthetic Minor)

[Source Number]: [Processing Throughput Limit (gallons/rolling 12-month consecutive period)] – [Permitted Material]

- S-1: ~~247,000,000~~244,624,000 - Gasoline, Gasoline Additives; 34,944,000 - Ethanol; 90,000,000 - Diesel, Biodiesel, Renewable Diesel, and Jet A; ~~624,000~~3,000,000 - Transmix
 - S-24: 2,520,000 - Renewable Diesel, Biodiesel
 - S-25: 2,520,000 - Renewable Diesel, Biodiesel
 - S-4, S-11 to S-16, S-22, S-23, S-31, S-34, S-36, S-37, S-64, and S-73 to S-76: 619,960,000 - Diesel and Jet A
 - S-4, 6, S-10, S-13, S-14, S-21, S-27 to S-30, and S-51: ~~1,785,355,721~~1,782,979,721 - Gasoline
 - S-18, S-33, S-41, S-42, S-45 to S-49, S-74, S-76: 243,000 - Additive & Lube Oil
 - S-26: ~~624,000~~3,000,000 - Transmix
 - S-53, S-54: 27,375,000 Oily water and Slop oil
 - S-58: 34,944,000 – Ethanol; 34,944,000 - Jet A
 - S-59: 30,000,000 - Wastewater
 - S-77: 306,600,000 - Loading of Diesel and Jet A
 - Truck Refueling Stations (diesel): 219,000 - Diesel
 - Underground Tank (pumpback-Gasoline): 1,684,000 - Gasoline
5. Air District approved logs shall be maintained for all sources. The logs shall be retained for at least five years and be available for review during normal business hours by the Air District's representatives, and shall include the following information: (Basis: Recordkeeping, Synthetic Minor)
 - a. daily records of the quantity of each material processed at S-1;
 - b. monthly records of the quantity of each material processed at each source or group of sources other than S-1;
 - c. the emission factors and the weight percents of VOC and individual HAPs in each material or other Air District approved recording methods that provide sufficient information to calculate VOC and HAP emissions;
 6. A monthly summary of VOC, individual HAP and combined HAP usages and emission calculations shall be prepared within twenty business days after the end of each calendar month. The owner/operator shall use AP-42 methods, EPA's tank program, and emission factors specified by Air District's regulations. (Basis: Synthetic Minor)
 7. The year-to-date total emissions of VOC, each individual HAP and combined HAPs shall be derived every month by summing the totals for the previous twelve months. The summaries shall be complete within thirty business days after the end of each month. (Basis: Synthetic Minor)

8. The owner/operator shall prepare and submit an annual report to the Air District's Enforcement Division. The report shall be prepared for the year ending on July 31st of each year and shall be submitted by September 30 of each year. The annual report for the first year following the date this permit is issued shall be compiled from records documenting VOC usage as required by permit conditions existing prior to the synthetic minor permit, as well as records documenting VOC and HAP usage as required by this synthetic minor operating permit. This report shall contain: (Basis: Synthetic Minor)
 - a. the usage of each material for each source or group of sources for the previous twelve months;
 - b. the emission factors and weight percents of VOC and each HAP in each material processed, or equivalent information sufficient to determine emissions from usage data; and
 - c. the annual emissions of VOCs, individual HAPs and total HAPs as calculated for each of the previous twelve months based on actual usage.
9. The owner/operator shall notify the Air District in writing within ten calendar days of any determination that the facility has exceeded any of the above limits. The notification shall be addressed to the Director of Enforcement and Compliance. (Basis: Synthetic Minor)
10. The owner/operator shall not load any gasoline or non-exempt organic liquids into a marine vessel unless the marine loading operation received a permit to operate from the Air District. (Basis: Regulation 2-1-302)
11. The owner/operator shall conduct annual testing or provide equivalent documentation to determine the weight percentage of HAPs in gasoline stored at the facility. These concentrations and records shall be made available to Air District personnel upon request and shall be kept for a minimum of five years. (Basis: Synthetic Minor)
12. The tank degassing operations shall be vented at all times to properly maintained and properly operated abatement device with a minimum control efficiency of 90 wt %. The owner/operator shall maintain the following records for each day of operation:
 - a. Identification of tanks degassed, dates and hours of degassing
 - b. The monthly POC and HAP emissions from tank degassing operation shall be included in the total monthly summary of VOC, individual HAP and combined HAP usages and emission calculations

These records shall be made available to Air District personnel upon request and shall be kept for a minimum of five years. (Basis: Synthetic Minor)

FOR S-1, TRUCK LOADING RACK abated by A-1, JOHN ZINK ADSORPTION SYSTEM

13. Deleted, CARB Certification requirement, 7/6/04.
14. The owner/operator of A-1 shall install an Air District approved exhaust flow measurement and continuous hydrocarbon emission monitor at each exhaust outlet of the vapor recovery system. This monitor shall continuously measure hydrocarbon concentration in parts per million as C3. (Basis: Cumulative Increase)
- 15a. The owner/operator of S-1 and A-1 shall ~~meet not exceed~~ 0.02 pounds organic per 1000 gallons of gasoline, gasoline additives, ethanol, and/or Transmix loaded criteria of Air District's Best Available Control Technology (BACT) Guideline. (Basis: BACT, Offsets/Cumulative increase)

To determine compliance with the above requirement, the following calculation should be used using reading obtained from the field (based on six hour average and/or per loading event duration).

- a. Total volume (in ft³) gone through the carbon beds in the last hour (reading from the turbometer).
- b. Concentration of non-methane organic compound (NMOC) in ppm (from strip chart or data logger)
- c. Materials throughput in gallons (gal)

$$(\text{NMOC, lb}) = \frac{(\text{concentration, ppm})(\text{volume, ft}^3)(44)}{(1,000,000)(386.9)}$$

$$\text{Emission factor, lb/1000 gal} = \frac{(\text{NMOC, lb})}{\text{Throughput, gal}} \times (1000)$$

Note: 44 is the molecular weight for C3
One pound mole of gas occupied 386.9 ft³ at 70°F

- 15b. The owner/operator of S-1 and A-1 shall not exceed 0.0004 pounds organic compound emissions per 1000 gallons of diesel, Jet A, biodiesel, and/or renewable diesel loaded. (Basis: Offsets/Cumulative increase)
- 15c. To determine compliance with Part 15b, the owner/operator of S-1 and A-1 shall demonstrate compliance using the calculation method specified in Part 15a. (Basis: Offsets/Cumulative increase)
- 15d. In the event that the monitoring in Parts 15a and/or 15c indicates an exceedance of the respective emission factors in Parts 15a and/or 15b, or if the monitoring is determined to be malfunctioning, then the owner/operator of S-1 and A-1 shall conduct an Air District approved source test with 60 days in order to demonstrate compliance with Parts 15a and/or 15b. (Basis: Offsets/Cumulative increase)
16. Deleted, Source test requirement, 7/6/04.
- 17a. The owner/operator of S-1 Truck Loading Rack shall not exceed:
- ~~247,000,000~~244,624,000 gallons of gasoline and gasoline additives combined; 34,944,000 gallons of ethanol; 90,000,000 gallons of Diesel, Biodiesel, Renewable Diesel, and Jet A combined; and ~~624,000~~3,000,000 gallons of Transmix, per consecutive 12-month rolling period.
 - 980,193 gallons of gasoline, gasoline additives, ethanol, and Transmix combined; and 29,120 gallons of Diesel, Biodiesel, Renewable Diesel, and Jet A combined, per calendar day; or 980,775 gallons of gasoline, gasoline additives, ethanol, Transmix, Diesel, Biodiesel, Renewable Diesel, and Jet A, combined, per calendar day.
 - The CARB certified terminal gasoline throughput limits (as of 8/91, the CARB certified hourly throughput limits is 66,000 gal/hr, and as of 8/2003, the CARB certified daily throughput limit is 875,000 gal/day).
- (Basis: Cumulative Increase, offsets, BACT)
- 17b. The Owner/Operator of S-1 and A-1 may load alternate materials other than the materials specified in Part 17a and/or usages in excess of those specified in Part 17a, provided that the Owner/Operator can demonstrate that all of the following are satisfied:
- Total POC and NPOC emissions, combined, from S-1 and A-1 do not exceed 2.844 tons in any consecutive twelve-month period;
 - Total POC and NPOC emissions, combined, from S-1 and A-1 do not exceed 19.62 pounds in any calendar day;
 - The use of these alternate materials does not increase toxic air contaminant (TAC) emissions equal to or above any acute and/or chronic TAC trigger level in Table 2-5-1 of Regulation 2, Rule 5. The owner/operator shall maintain records of any TAC component contents of each alternate material used and supporting mass emission calculations demonstrating TAC emissions do not equal or exceed the acute and/or chronic TAC trigger levels in Table 2-5-1 of Regulation 2, Rule 5 by calculating TAC emissions on a pound per hour and pound per year basis, respectively.
- (Basis: Cumulative Increase; Offsets; BACT; Toxics)
18. The owner/operator of A-1 shall perform twice monthly inspection of the Vapor Holding Tank to determine organic concentrations in the airspace above the diaphragm. (Basis: Cumulative Increase)
19. Deleted, 7/4/04 Start up requirement.

20. The owner/operator of A-1 shall maintain Air District approved records of all data necessary to determine compliance with the above permit conditions and with the requirements of Regulation 8, Rule 33. These records shall be kept at the facility for a minimum of 5 years and shall be made available to Air District personnel upon request. (Basis: Record Keeping)

For S-18, FIXED ROOF STORAGE TANKS:

21. Source S-18 shall only store materials with a true vapor pressure of 0.1 psia or less. [Basis: Cumulative Increase or Regulation 2-1-234]

For S-5, S-7, S-8 AND S-9, OUT OF SERVICE STORAGE TANKS:

22. The owner/operator of S-5, S-7, S-8 and S-9 must notify the Air District in writing three days before any tanks return to service. All tank seal inspections and compliance verification must be done according to Regulation 8, Rule 5 prior to operation. [Basis: Regulation 8, Rule 5]

For S-10, STORAGE TANK:

23. The secondary wiper seal on Tank 9 (S-10) shall comply with the zero-gap criteria of Air District Regulation 8, Rule 5. [Basis: Regulation 8, Rule 5]

For S-6, S-10, S-11, S-29, S-30 AND S-51, STORAGE TANKS:

24. The primary and secondary seals on Tanks 10 (S-11), S-6, S-10, S-29, S-30, and S-51 shall meet the gap criteria as defined in Air District Regulation 8-5-321.3.2 & 8-5-322.3, respectively. [Basis: Regulation 8, Rule 5]

For S-27 AND S-28, STORAGE TANKS:

25. The owner/operator of S-27 and S-28 Internal Floating Roof Tanks shall contact the Air District at least 3 days before returning these tanks to service to allow for a complete inspection of the new floating roofs. [Basis: Regulation 8, Rule 5]
26. S-27 (Tank #27) shall be abated by an internal floating roof with a liquid mounted resilient foam log primary seal and a rim mounted secondary wiper seal. [Basis: Regulation 8, Rule 5]
- *27. The annual average benzene concentration for all gasoline products stored in S-27 shall not exceed 4.0% (vol.). [Basis: Toxics Risk Assessment requirement adopted by the Air District Board on May 21, 1986]
- *28. The owner/operator of S-27 shall maintain records of the benzene concentration (vol.) and total throughput for all gasoline products stored in S-27. If the benzene concentration is unavailable for a given gasoline shipment, the records shall indicate the reason for this unavailability. Unavailable concentration data shall not exceed 10% of the total volumetric throughput for S-27. These concentration and throughput records shall be made available to Air District personnel upon request and shall be kept for a minimum of five years. [Basis: Toxics Risk Assessment requirement adopted by the Air District Board on May 21, 1986]

For S-51, STORAGE TANK:

29. The total cumulative throughput of gasoline for storage tank S-51 shall not exceed 773,000 bbl per any consecutive 12-month period. The daily throughput of gasoline shall be recorded in an Air District approved logbook and shall be retained for at least five years from date of entry. These records shall be made available to the Air District staff for inspection upon request. [Basis: Regulation 2-1-301]

For S-58, STORAGE TANK:

30. Total Jet Fuel "A" throughput at S-58 shall not exceed 34,944,000 gallons in any consecutive 12-month period. (Basis: Cumulative Increase)
31. Total Ethanol throughput at S-58 shall not exceed 34,944,000 gallons in any consecutive 12-month period. (Basis: Cumulative Increase)
32. The S-58 Internal Floating Roof Storage Tank shall store only Jet Fuel "A" and/or Ethanol. (Basis: Cumulative Increase)
33. The S-58 Internal Floating Roof Storage Tank shall be equipped with primary and secondary seals that are in compliance with requirements of Regulation 8, Rule 5, and 40 CFR 60, Subpart Kb for Storage of Organic Liquids. (Basis: Regulation 8, Rule 5, NSPS)
34. Monthly records of all precursor organic throughputs at S-58 shall be kept in an Air District approved log and retained for at least five years from the date of entry. This log shall be kept on site and made available to Air District Staff upon request. (Basis: Cumulative Increase)

For S - 59, OIL/WATER SEPARATOR:

35. Source S-59, Oil/Water Separator shall be equipped with a solid, gasketed, fixed cover totally enclosing the separator according to Regulation 8, Rule 8. (Basis: Regulation 8, Rule 8)

For S - 80, EMERGENCY STANDBY ENGINE:

36. Operating for reliability-related activities is limited to 50 hours per year per engine.

[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e)(2)(A)(3) or (e)(2)(B)(3)]

37. The owner or operator shall operate each emergency standby engine only for the following purposes: to mitigate emergency conditions, for emission testing to demonstrate compliance with an Air District, state or Federal emission limit, or for reliability-related activities (maintenance and other testing, but excluding emission testing). Operating hours while mitigating emergency conditions or while emission testing to show compliance with Air District, state or Federal emission limits is not limited.

[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e)(2)(A)(3) or (e)(2)(B)(3)]

38. The owner/operator shall operate each emergency standby engine only when a non-resettable totalizing meter (with a minimum display capability of 9,999 hours) that measures the hours of operation for the engine is installed, operated and properly maintained.

[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e)(4)(G)(1)]

39. Records: The owner/operator shall maintain the following monthly records in an Air District-approved log for at least 36 months from the date of entry (60 months if the facility has been issued a Title V Major Facility Review Permit or a Synthetic Minor Operating Permit). Log entries shall be retained on-site, either at a central location or at the engine's location, and made immediately available to the Air District staff upon request.
 - a. Hours of operation for reliability-related activities (maintenance and testing).
 - b. Hours of operation for emission testing to show compliance with emission limits.
 - c. Hours of operation (emergency).

- d. For each emergency, the nature of the emergency condition.
- e. Fuel usage for each engine(s).

[Basis: "Stationary Diesel Engine ATCM" section 93115, title 17, CA Code of Regulations, subsection (e)(4)(I), (or Regulation 2-6-501)]

For S – 13, AND S-14 STORAGE TANKS:

- 40. The owner/operator shall not load more than 98,754,987 gallons of gasoline into S-13 and S-14 in any consecutive 12-month period. [Basis: Cumulative Increase]
- *41. The owner/operator shall ensure the average benzene concentration in all hydrocarbon liquids stored in Storage Tanks S-13 and S-14 is less than or equal to 1.608 % by weight. The owner/operator of sources S-13 and S-14 shall analyze all materials stored in each of these tanks for benzene concentration at least once every 6 months. Each tank shall be sampled within 30 days of start-up. If the owner/operator can demonstrate that several tanks contain hydrocarbon from a single source (shipment), then a single benzene analysis may be performed for that group of tanks. These records shall be kept on file for at least 5 years after the date of entry and shall be made available to Air District personnel upon request. All tests shall be performed in accordance with Air District approved laboratory procedures. [Basis: Cumulative Increase]
- 42. The owner/operator shall inspect all new valves and flanges associated with this project according to the criteria of Air District Regulation 8-18 and any future revisions to this rule. [Basis: Reg. 8-18]
- 43. The owner/operator shall ensure that sources S-13 and S-14 meet all applicable requirements of Air District Regulation 8-5, and Best Available Control Technology (BACT). [Basis: Reg. 8-5, BACT]
- 44. The POC emission from S-13 and S-14 combined shall not exceed 5.40 tons during any consecutive 12-month period. [Basis: Cumulative Increase]
- 45. In order to demonstrate compliance with the above conditions, the owner/operator of tanks S-13 and S-14 shall maintain the following records in an Air District approved log. These records shall be kept on site and made available for Air District inspection for a minimum period of five years from the date that the record was made. [Basis: Record keeping]
 - a. The type and VOC content of all materials stored and the dates that the materials were stored
 - b. The total daily throughput of each material stored, summarized on a monthly and annual basis

For S-4 STORAGE TANK:

- 46. The owner/operator shall not load more than 3,100,734 gallons of gasoline/organic liquids into S-4 in any consecutive 12-month period. [Basis: Cumulative Increase]
- 47. The owner/operator shall ensure that the average benzene concentration in all hydrocarbon liquids stored in Storage Tank S-4 is less than or equal to 1.608 % by weight. The owner/operator of source S-4 shall analyze all materials stored in this tank for benzene concentration at least once every 6 months. The tank shall be sampled within 30 days of start-up. If the owner/operator can demonstrate that several tanks contain hydrocarbon from a single source (shipment), then a single benzene analysis may be performed for that group of tanks. These records shall be kept on file for at least 5 years after the date of entry and shall be made available to Air District personnel upon request. All tests shall be performed in accordance with Air District approved laboratory procedures. [Basis: Cumulative Increase, Toxics]
- 48. The owner/operator shall inspect all new valves and flanges associated with this project according to the criteria of Air District Regulation 8-18 and any future revisions to this rule. [Basis: Reg. 8-18]
- 49. The owner/operator shall ensure that source S-4 meets all applicable requirements of Air District Regulation 8, Rule 5, and Best Available Control Technology (BACT) such as a liquid mounted primary

seal and a zero gap secondary seal, all meeting the design criteria of Reg. 8, Rule 5. Also, all roof penetrations must be gasketed, slotted guide poles must be equipped with float and wiper seals, and adjustable roof legs must be fitted w/ vapor seal boots or equivalent. [Basis: Reg. 8-5, BACT]

50. The POC emissions from S-4 shall not exceed 2.86 tons during any consecutive 12-month period. [Basis: Cumulative Increase]
51. In order to demonstrate compliance with the above conditions, the owner/operator of tank S-4 shall maintain the following records in an Air District approved log. These records shall be kept on site and made available for Air District inspection for a minimum period of five years from the date that the record was made. [Basis: Cumulative Increase]
 - a. The type and VOC content of all materials stored and the dates that the materials were stored
 - b. The total daily throughput of each material stored, summarized on a monthly and annual basis

For S-82 CHEMICAL TOTES (2) & INJECTION SYSTEM:

52. The owner/operator of S-82 shall not have combined tote and fugitive emissions of more than 68.45 pounds of POC in any consecutive 12-month period. (Basis: Cumulative Increase)
53. The owner/operator of S-82, Chemical Tote & Injection System, shall not store any chemical additive material with a true vapor pressure that exceeds 1.5 psia. (Basis: Cumulative Increase)
54. The owner/operator of S-82, Chemical Tote & Injection System, shall equip the chemical tote with a submerged fill pipe that complies with the requirement of Regulation 8-5-301 for Storage of Organic Liquids. (Basis: Regulation 8-5)
55. The owner/operator of S-82 shall keep monthly throughput records of all chemical additive materials at S-82 in an Air District approved log. The records shall be retained for a period of at least five years from the date of entry. This log shall be kept on site and made available to Air District Staff upon request. (Basis: Recordkeeping)

Conditions for Fugitive Components installed as part of AN32039 (Biodiesel/Renewable Diesel Project):

- S-1 (Loading Rack)
 - S-24 (Tank 24 – Fixed Roof)
 - S-25 (Tank 25 – Fixed Roof)
 - S-75 (Tank 57 – Internal Floating Roof)
56. The owner/operator of S-1, S-24, S-25, and/or S-75 shall install only the following types of valves: (1) bellows sealed, (2) diaphragm Valves, (3) live loaded, (4) graphitic packed, (5) quarter-turn (e.g., ball valves or plug valves), and/or (6) equivalent (or other low emission valves) as determined by the APCO. (Basis: Regulation 2-2-208 Cumulative Increase, Typical Control Technology in BACT Handbook)
 57. The owner/operator of S-1, S-24, S-25, and/or S-75 shall comply with a leak standard of 100 ppm of Total Organic Compounds (TOC) measured as C1 at any valve installed unless the owner/operator complies with the applicable leak minimization and repair provisions contained in Regulation 8-18. All valves shall be subject to the Part 67 inspection frequency. (Basis: Typical Control Technology in BACT Handbook)
 58. The owner/operator of S-1, S-24, S-25, and/or S-75 shall install graphitic-based gaskets on all flanges or connectors (gasketed) or equivalent as determined by the APCO. (Basis: Typical Control Technology in BACT Handbook)
 59. The owner/operator of S-1, S-24, S-25, and/or S-75 shall comply with a leak standard of 100 ppm of TOC (measured as C1) at any flanges/connectors unless the owner/operator complies with the applicable leak minimization and repair provisions contained in Regulation 8-18. All flanges/connectors shall be subject to the Part 67 inspection frequency. (Basis: Typical Control Technology in BACT Handbook)

60. The owner/operator of S-24 and/or S-25 shall install double mechanical seals w/ barrier fluid; magnetically coupled pumps; canned pumps; magnetic fluid sealing technology; seal system with leakage vented to thermal oxidizer; or other BAAQMD approved equivalent control device; or Air District approved control technology as determined by the APCO on all new/replaced pumps. All pumps shall be subject to the Part 67 inspection frequency. (Basis: Typical Control Technology in BACT Handbook)
61. The owner/operator of S-24 and/or S-25 shall comply with a leak standard of 100 ppm of TOC (measured as C1) at any pump unless the owner/operator complies with the applicable leak minimization and repair provisions contained in Regulation 8-18. (Basis: Typical Control Technology in BACT Handbook)
62. The owner/operator of S-1, S-24, S-25, and/or S-75 shall identify all new/replaced valves, connectors, pressure relief devices, compressors, and pumps with a unique permanent identification code and shall include all new/replaced fugitive equipment in the fugitive equipment monitoring and repair program. The owner/operator shall monitor all repaired equipment within 24 hours of the repair. The unique permanent identification code does not apply to quarter-inch or less tubing and connectors associated with analytical sampling systems. (Basis: Regulation 8-18-402 Identification)
63. The owner/operator of S-1, S-24, S-25, and/or S-75 has been permitted to install new and/or replace the following number of TOC service fugitive components for AN32039:
 - 81 valves
 - 114 flanges
 - 222 connectors
 - 6 PSV's/PRV's
 - 32 other components
 - 2 pumps(Basis: Regulation 2-2-208 Cumulative Increase)
64. The owner/operator of S-1, S-24, S-25, and/or S-75 shall not exceed 0.36 tons per consecutive 12 month period of TOC emissions (measured as C1) from all fugitive component counts installed in Part 63. Compliance with this provision shall be verified quarterly using methods described in Part 66. The results shall be submitted to the Air District within 30 days of the close of each calendar quarter after commencing with start-up of the system. The owner/operator shall keep records of fugitive component counts (including the unique permanent identification codes) and corresponding TOC emissions for at least five years from date of entry. For the purposes of these conditions POC/NMOC emissions shall be considered equal to the TOC emissions as determined by the Regulations 2-2 and 8-18 LDAR program. (Basis: Regulation 2-2-208 Cumulative Increase, Regulation 8-18)
65. Within 30 days of the completion of the installation of all fugitive components for each subpart in Part 63, the owner/operator of S-1, S-24, S-25, and/or S-75 shall submit a final component counts for each source, final component counts for the Biodiesel/Renewable Diesel Project (AN32039), and TOC emissions estimate using the approved methods within these conditions to the Air District. Any new and/or replaced components shall be included as installed. If any of the fugitive component counts exceed or is less than a count stated above, the plant's cumulative increase emissions and TAC emissions estimate shall be adjusted as needed, subject to APCO approval, to reflect only the difference between emissions based on predicted component counts versus actual component counts. The amount of refund or additional offsets and if an HRA is needed shall be addressed or provided before issuance of the permit to operate. (Basis: Regulation 2-2-208 Cumulative Increase, Regulation 8-18)
66. The owner/operator of S-1, S-24, S-25, and/or S-75 shall calculate fugitive emissions utilizing only Air District approved methods. For all components, the owner/operator shall use the California Air Pollutant Control Officers Association (CAPCOA) correlation equations, midpoint method, default zero factors, 10,000 ppm pegged factors and/or other method approved by the Air District. The owner/operator shall include emissions estimates from all fugitive components associated with this application in order to

demonstrate compliance with Parts 64 and 68 through 71. The quarterly fugitive emissions calculations shall start upon installation of any new/replaced components identified in Part 63 with the results being submitted to the Air District within 30 days of the close of each quarter. (Basis: Regulation 2-2-208 Cumulative Increase, Typical Control Technology in BACT Handbook, Regulation 8-18)

67. The owner/operator of S-1, S-24, S-25, and/or S-75 shall conduct inspections of fugitive components of these conditions in accordance with the frequency below:

Valves:	Quarterly
Connectors:	Biannual (twice a year)
Flanges:	Biannual (twice a year)
Pressure Relief Valves:	Quarterly
Compressors:	Quarterly
Pumps:	Quarterly
Process Drains:	Quarterly

(Basis: Regulation 8-18, BACT)

68. The owner/operator of S-1 (Loading Rack) has been permitted for the following total number of TOC service fugitive components:

- 310 valves
- 951 connectors
- 221 others
- 523 flanges

Source S-1 may exceed the component counts specified above provided that both the emissions from all fugitive components added and/or replaced qualify for the exemption under Regulation 2-1-128.21. The owner/operator of S-1 shall submit an application to update the fugitive counts above, to update the mass emission limits both above (Part 64) and the paragraph below, to confirm that BACT has been satisfied, and to provide offsets for the new/replaced components. The potential to emit of the added and/or replaced fugitive components shall be calculated according to Regulation 8-18 requirement and shall be used to determine the offsets due and if an HRA is required. The application shall be submitted to the Air District by the end of January for the previous calendar year's component counts added and/or replaced. Any new and/or replaced components shall be included and reported as required by Parts 63 and/or 64.

The owner/operator of S-1 shall not exceed 28.70 lbs per day and/or 1.577 tons per consecutive 12 month period of TOC emissions (measured as C1) from all fugitive components included in the above counts. Compliance with this provision shall be verified quarterly using methods described in Part 66. The results shall be submitted to the Air District within 30 days of the close of each calendar quarter after commencing with start-up of any equipment included as part of Application 32039. The owner/operator shall keep records of fugitive component counts, unique identification numbers, and corresponding TOC emissions for at least five years from date of entry. For the purposes of these conditions POC/NMOC emissions shall be considered equal to the TOC emissions are determined by the Regulations 2-2 and 8-18 LDAR program. (Basis: Regulation 2-2-208 Cumulative Increase, Regulation 8-18)

69. The owner/operator of S-75 has been permitted for the following total number of TOC service fugitive components:

- 30 valves
- 93 connectors
- 3 PSV's/PRV's
- 6 others
- 1 pumps
- 36 Flanges

Source S-75 may exceed the component counts specified above provided that both the emissions from all fugitive components added and/or replaced qualify for the exemption under Regulation 2-1-128.21. The

owner/operator of S-75 shall submit an application to update the fugitive counts above, to update the mass emission limits both above (Part 64) and the paragraph below, to confirm that BACT has been satisfied, and to provide offsets for the new/replaced components. The potential to emit of the added and/or replaced fugitive components shall be calculated according to Regulation 8-18 requirement and shall be used to determine the offsets due and if an HRA is required. The application shall be submitted to the Air District by the end of January for the previous calendar year's component counts added and/or replaced. Any new and/or replaced components shall be included and reported as required by Parts 63 and/or 64.

The owner/operator of S-75 shall not exceed 14.75 lbs per day and/or 0.126 tons per consecutive 12 month period of TOC emissions (measured as C1) from all fugitive components included in the above counts. Compliance with this provision shall be verified quarterly using methods described in Part 66. The results shall be submitted to the Air District within 30 days of the close of each calendar quarter after commencing with start-up of any equipment covered by Application 32039. The owner/operator shall keep records of fugitive component counts, unique identification numbers, and corresponding TOC emissions for at least five years from date of entry. For the purposes of these conditions POC/NMOC emissions shall be considered equal to the TOC emissions as determined by the Regulations 2-2 and 8-18 LDAR program. (Basis: Regulation 2-2-208 Cumulative Increase, Regulation 8-18)

For S-26 Transmix Storage Tank

70. The owner/operator of S-26 shall only store Transmix. The owner/operator of S-26 shall not exceed a maximum True Vapor Pressure (TVP) of greater than 5.397 psia. (Basis: Cumulative Increase)
71. The owner/operator of S-26 shall not exceed 3,000,000 gallons of Transmix during any consecutive twelve-month period. (Basis: Cumulative Increase)
72. The owner/operator of S-26 shall not exceed 115,878 gallons of Transmix during any calendar day. (Basis: Cumulative Increase)
73. The owner/operator of S-26 shall demonstrate compliance with the limits specified in Part 70 via either SDS or sampling of the Transmix prior to loading into S-26 using the approved BAAQMD Method 13. (Basis: Cumulative Increase)
74. The owner/operator of S-26 shall perform sampling analysis on a monthly basis using the approved BAAQMD Method 13 to determine the True Vapor Pressure of the Transmix material per Part 70. (Basis: Cumulative Increase)
75. The owner/operator of S-26 shall not exceed the following:
 - a. Total POC and/or NPOC emissions combined from S-26 do not exceed 2,453 pounds in any consecutive twelve-month period;
 - b. Total POC and/or NPOC emissions combined from S-26 do not exceed 7.31 pounds in any calendar day;(Basis: Cumulative Increase)
76. To determine compliance with the above parts, the owner/operator shall maintain the following records and provide all of the data necessary to evaluate compliance with the above parts, including the following information:
 - a. Quantities and Safety Data Sheets and/or TVP analytical data of Transmix stored at this source on a daily and monthly basis.
 - b. Daily and monthly throughput and/or emission calculations shall be totaled for each consecutive twelve-month period.
 - c. Records of all monthly TVP analyses per part 74.All records shall be retained on-site for five years, from the date of entry, and made available for inspection by Air District staff upon request. These recordkeeping requirements shall not replace the

recordkeeping requirements contained in any applicable Air District Regulations. (Basis: Cumulative Increase: Toxics)

END OF CONDITION

Recommendation

Issue an alteration permit to operate (Application #31964) and change of conditions to the Synthetic Minor Permit to Operate (Application #710879) for the following sources to Kinder Morgan Liquids Terminal – Richmond Products Terminal:

- S-1** Multi-liquid Truck Loading Rack for Gasoline & Diesel Fuel; 16 total arms (6 permitted gasoline, 1 permitted transmix, 1 permitted ethanol, 1 permitted gasoline additive, 4 exempt diesel/biodiesel, 2 exempt renewable diesel/biodiesel, and 1 exempt biodiesel)
Abated by: A-1
- A-1** Vapor Adsorption System; Make: John Zink, Model: Series 2000, Filter Material: Activated Carbon/Charcoal
- S-26** External Floating Roof Tank, 311K gal, White, Gasoline, unleaded (TANK NO. 26)

11/18/2024

Date



Eric Grulke
Senior Air Quality Engineer