



May 12, 2025

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale St, Suite 600
San Francisco, CA 94105
Attn: Title V Reports

TV Tracking #1122 (Semi-Annual) - amended

1. RECEIVED IN
ENFORCEMENT: 06/18/2025

Electronic submittal

Subject: SFPP, L. P.'s Brisbane Terminal, Plant ID #4021
Title V Semi-Annual Monitoring Report for the Period 11/01/24 through 04/30/25
950 Tunnel Ave, Brisbane, California 94005

Attn: Title V Reports:

SFPP, L.P. ("SFPP") submits the enclosed Semi-Annual Monitoring Report in accordance with Section I, and F. of the Final Major Facility Review Permit issued to Facility #A4021, SFPP Brisbane Terminal. The Semi-Annual Monitoring Report covers the period from November 1, 2024 through April 30, 2025.

If you have any questions, please contact me at (415) 307-1374 or Donny_Homer@kindermorgan.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Donny Homer', is written over a light blue horizontal line.

Donny Homer
Senior EHS Specialist
for SFPP, L.P.

Enclosure

Bay Area Air Quality Management District

375 Beale St, Suite 600, San Francisco, CA. 94105

Telephone: (415) 771-6000

**Report of Required Monitoring
TITLE V Operating Permit**

Facility Name: SFPP, L.P. Brisbane Terminal

Address: 950 Tunnel Avenue, Brisbane, California 94005

Title V Permit Number: A4021

Reporting Period: November 1, 2024 through April 30, 2025

I hereby certify that I am a Responsible Official for the above named facility as defined in 40 Code of Federal Regulations, Part 70.2. I further certify that, based on information and belief formed after reasonable inquiry, the statements and information in this certification are true, accurate, and complete.

Daniel Wittenberg

Signature of Responsible Official

5/2/2025

Date

Daniel Wittenberg

Name of Responsible Official (please print)

Director of Operations

Title of Responsible Official (please print)

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

**Table VII - A
 Applicable Limits and Compliance Monitoring Requirements
 S21, S22, S23, S24, S25 – LOADING RACKS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-33-301.1	N		9.6 g/1000 liters (0.08 lb/1000 gallons)	CARB Certification	P/ 9-15 months	Source test, Recordkeeping	Continuous	
POC	BAAQMD 8-33-301.2	N	01/10/2011	0.04 lb/1000 gallons	BAAQMD 8-33-309-4; 8-33-309.13; CARB Certification	C: P/9-15 months	Parametric; Source test; Recordkeeping; Notification	Continuous	
	BAAQMD 8-33-308	N	01/10/2011	< 3,000 ppm as methane or 6% of the LEL	BAAQMD 8-33-308.2; BAAQMD Condition #4275, part 1e, and part 15	C; P/weekly	Infrared HC Analyzer; Recordkeeping	Continuous	
POC	BAAQMD 8-33-309.2	N	01/10/2011	18 in. of water column	BAAQMD 8-33-309.11, and BAAQMD Condition #4275, part 1b	P/during product loading	Pressure gauge; Recordkeeping	Continuous	
POC	SIP 8-33-301.	Y		9.6 g/1000 liters (0.08 lb/1000 gallons)	CARB Certification	P/ E; throughput limit revision	Source test, Recordkeeping	Continuous	
	SIP 8-33-308	Y		3,000 ppm as methane and 6.8 kg (15 pounds) per day	BAAQMD Condition #4275, part 1e, and part 2	C	Infrared HC Analyzer	Continuous	
	SIP 8-33-309	Y		46 cm (18 in.) of water column	BAAQMD 8-33-309, and BAAQMD Condition #4275, part 1b	P/during product loading	Pressure gauge	Continuous	
	40 CFR 60.502(b)	Y		35 g/1000 liters	40 CFR 60.503(c)	None	N	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

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POC	40 CFR 60.502(e)	Y		Vapor-tight gasoline tank trucks	40 CFR 60.505(b)	P/during product loading, and within 2 weeks	Vapor tightness documents	Continuous	
POC	40 CFR 60.502(j)	Y		Liquid or vapor leaks	40 CFR 60.502(j) and 60.505(c)	P/M	Inspection; Records	Continuous	
POC	40 CFR 60.505(e)(ii)	Y		Vapor-tight gasoline tank trucks electronic recordkeeping	40 CFR 60.505(b)	P/during product loading, and within 2 weeks	Vapor tightness documents	Continuous	
	40 CFR 63.11088(a)	Y	1/10/2011	80 mg/liters	40 CFR 63.11092(a)	P/6 months	Source test	Continuous	
	40 CFR 63.11088(a)	Y	1/10/2011	Vapor-tight gasoline tank trucks	40 CFR 63.11092(f)(1)	P/annual	Certification test documents	Continuous	
	BAAQMD Condition #4275, part 5	Y		120 ppm as propane	BAAQMD Condition #4275, part 1c	C	Infrared HC Analyzer	Continuous	
Temperature	BAAQMD Condition #4275, part 11	Y		Operating temperature 500 degrees Fahrenheit	BAAQMD Condition #4275, part 15	C	BAAQMD Condition #4275, part 11	Continuous	
Total material through-put limit	BAAQMD Condition #4275, part 6	Y		250,000 gal/hr 2,400,000 gal/day 876,000,000 gal/yr 100,000 gal/yr direct mode	BAAQMD Condition #4275, part 9	P/D	Recordkeeping	Continuous	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD Condition #4275, part 11	Y		Operating temperature 500 degree Fahrenheit	BAAQMD Condition #4275, part 15	C	Record Keeping	Continuous	
POC	BAAQMD 8-18-305	Y		All equipment associated with delivery and loading operations shall be maintained to be leak free, vapor tight and in good working order.			Inspection	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S1, S2, S4, S5, S6, S7, S8, S9, S10, S11, S12, S13, S15, S16, S18, S20 - INTERNAL FLOATING ROOF TANKS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-5-303.1	N		PVV set within 10% of max pressure or 25.8 mmHg (0.5 psia)	BAAQMD 8-5-403 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-320.3.1	N		Gasket cover \leq 0.32 cm (1/8 in) gap	BAAQMD 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-320.3.2	N		Inaccessible opening no visible gap	BAAQMD 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-320.4.2	N		Solid sampling or gauging wells in closed position with cover, seal or lid \leq 0.32 cm (1/8 in)	BAAQMD 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-320.4.3	N		Solid sampling or gauging wells: Gap between well and roof shall be added to gaps measured \leq 1.3 cm (1/2 in)	BAAQMD 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-320.5.2	N		Slotted sampling or gauging wells in closed position with cover, seal or lid \leq 1.3 cm (1/2 in)	BAAQMD 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

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POC	BAAQMD 8-5-320.5.3	N		Slotted sampling or gauging wells: Gap between well and roof shall be added to gaps measured ≤ 1.3 cm (1/2 in)	BAAQMD 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-320.6	N		Emergency roof drain with slotted membrane fabric cover $\geq 90\%$ opening area	BAAQMD 8-5-402 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-321.1	N		No holes, tears or other openings in the primary seal fabric	BAAQMD 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-321.2	N		Primary seal metallic shoe or liquid mounted type	BAAQMD 8-5-402.1 & 8-5-404	P/10 yr P/10 yr	Inspection Certification	Continuous	
POC	BAAQMD 8-5-321.3	N		Primary seal metallic shoe extends minimum 61 cm (24 in) for external floating and 46 cm (18 in) for internal floating roof tank above liquid surface	BAAQMD 8-5-401, & 8-5-404	P/10 yr P/10 yr	Inspection Certification	Continuous	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-5-321.3.1	N		Gap between shoe and tank shell is no greater than 46 cm (18 in)	BAAQMD 8-5-401, 8-5-404	P/10 yr P/10 yr	Inspection Certification	Continuous	
POC	BAAQMD 8-5-321.3.2	N		For welded tanks, gap between tank shell and the primary seal < 3.8 cm (1 1/2 in). No continuous gap > 0.32 cm ((1/8 in) shall exceed 10% of circumference. The cumulative length of all seal gaps exceeding 1.3 cm (1/2 in) < 10% of circumference and the cumulative length of all seal gaps exceeding 0.32 cm (1/8 in) < 40% of circumference	BAAQMD 8-5-401, 8-5-404	P/10 yr P/10 yr	Inspection Certification	Continuous	
POC	BAAQMD 8-5-322.1	N		No holes, tears, or other openings	BAAQMD 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-322.2	N		Secondary seal shall allow insertion up to 3.8 cm (1 1/2 in) in width	BAAQMD 8-5-402, & 8-5-404	P/10 yr P/10 yr	Inspection Certification	Continuous	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-5-322.3	N		Gap between tank shell and the secondary seal shall not exceed 1.3 cm (1/2 in)	BAAQMD 8-5-402, & 8-5-404	P/10 yr P/10 yr	Inspection Certification	Continuous	
POC	BAAQMD 8-5-328.1.1	N		Tank $\geq 75 \text{ m}^3$, Tank cleaning 90% control, POC concentration < 10,000 ppm	BAAQMD 8-5-502	P/A	Source Test	Continuous	
POC	SIP 8-5-303.1	Y		PVV set within 10% of max pressure or 25.8 mmHg (0.5 psia)	SIP 8-5-403 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-320.3.1	Y		Gasket cover $\leq 0.32 \text{ cm}$ (1/8 in) gap	SIP 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-320.3.2	Y		Inaccessible opening no visible gap	SIP 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-320.4.2	Y		Solid sampling or gauging wells in closed position with cover, seal or lid $\leq 0.32 \text{ cm}$ (1/8 in)	SIP 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-5-320.4.3	Y		Solid sampling or gauging wells: Gap between well and roof shall be added to gaps measured ≤ 1.3 cm (1/2 in)	SIP 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-320.5.2	Y		Slotted sampling or gauging wells in closed position with cover, seal or lid ≤ 1.3 cm (1/2 in)	SIP 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-320.5.3	Y		Slotted sampling or gauging wells: Gap between well and roof shall be added to gaps measured ≤ 1.3 cm (1/2 in)	SIP 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-320.6	Y		Emergency roof drain with slotted membrane fabric cover $\geq 90\%$ opening area	SIP 8-5-402 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-321.1	Y		No holes, tears or other openings in the primary seal fabric	SIP 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

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 S1, S2, S4, S5, S6, S7, S8, S9, S10, S11, S12, S13, S15, S16, S18, S20 - INTERNAL FLOATING ROOF TANKS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-5-321.2	Y		Primary seal metallic shoe or liquid mounted type	SIP 8-5-402.1 8-5-404	P/10 yr	Inspection Certification	Continuous	
POC	SIP 8-5-321.3	Y		Primary seal metallic shoe extends minimum 61 cm (24 in) for external floating and 18 in for internal Floating Roof tank above liquid surface	SIP 8-5-402, 8-5-404	P/10 yr	Inspection Certification	Continuous	
POC	SIP 8-5-321.3.1	Y		Gap between shoe and tank shell is no greater than 46 cm (18 in)	SIP 8-5-401, 8-5-404	P/10 yr	Inspection Certification	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-5-321.3.2	Y		For welded tanks, gap between tank shell and the primary seal < 3.8 cm (1 1/2 in). No continuous gap > 0.32 cm ((1/8 in) shall exceed 10% of circumference. The cumulative length of all seal gaps exceeding 1.3 cm (1/2 in) < 10% of circumference and the cumulative length of all seal gaps exceeding 0.32 cm (1/8 in) < 40% of circumference	SIP 8-5-401, 8-5- 404	P/10 yr	Inspection Certification	Continuous	
POC	SIP 8-5-322.1	Y		No holes, tears, or other openings	SIP 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-322.2	Y		Secondary seal shall allow insertion up to 3.8 cm (1 ½ in) in width	SIP 8-5-402, & 8-5-404	P/10 yr	Inspection Certification	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

**Table VII - B
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 S1, S2, S4, S5, S6, S7, S8, S9, S10, S11, S12, S13, S15, S16, S18, S20 - INTERNAL FLOATING ROOF TANKS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-5-322.3	Y		Gap between tank shell and the secondary seal shall not exceed 1.3 cm (1/2 in)	SIP 8-5-402, & 8-5-404	P/10 yr	Inspection Certification	Continuous	
POC	SIP 8-5-328.1.1	Y		Tank ≥ 75 m ³ , tank cleaning shall have liquid balancing with ≤ 0.5 psia	None	N	None	Continuous	
POC	SIP 8-5-328.1.2	Y		Tank ≥ 75 m ³ , Tank cleaning 90% control, POC concentration < 10,000 ppm	SIP 8-5-502	P/A	Source Test	Continuous	
Certification	BAAQMD 8-5-404			Submit report within 60 days of inspection or source test	BAAQMD 8-5-404		Submittal	Continuous	
POC	BAAQMD Condition #17285, part 1	Y		52.56 MM gal/yr	BAAQMD Condition #17285, part 2	P/D	Recordkeeping	Continuous	
	BAAQMD Regulation 8, Rule 5 (amended on 10/18/06)	Y						Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

**Table VII - C
 Applicable Limits and Compliance Monitoring Requirements
 S29, S30, S31, S32 – UNDERGROUND TANKS/SUMPS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	40 CFR 63.11087 (a)	Y	1/10/2011		40 CFR 63.11092(e)(1)	P/E 1 or 5 or 10 yrs	Visual Inspection, Recordkeeping	Continuous	
	BAAQMD Condition #16325, part 1	Y		214,150 gal gasoline/yr 92,350 gal jet kerosene/yr	BAAQMD Condition #16325, part 2	P/D	Record keeping	Continuous	
POC	SIP 8-18-301	Y		General equipment leak \leq 100 ppm	BAAQMD 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

**Table VII - D
 Applicable Limits and Compliance Monitoring Requirements
 S28 – OIL/WATER SEPARATOR**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-8-301.1	N		Roof seals, other openings Gap <0.125 inch	BAAQMD 8-8-301.1	P/Initially and 6 months	Visual inspection	Continuous	
POC	SIP BAAQMD 8-8-301.1	Y		Roof seals, other openings Gap <0.125 inch	SIP BAAQMD 8-8-301.1	P/Initially and 6 months	Visual inspection	Continuous	
POC	BAAQMD Condition #11349, part 2	Y		Change-out with unspent carbon upon the detection of 10 ppm and 10% of inlet concentration	BAAQMD Condition #11349, part 5	P/Weekly	Portable hydrocarbon detector, recordkeeping	Continuous	
POC	BAAQMD Condition #11349, part 3	Y		6 ppm	BAAQMD Condition #11349, part 5	P/Weekly	Portable hydrocarbon detector, recordkeeping	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

**Table VII – E
 Applicable Limits and Compliance Monitoring Requirements
 S35 – ETHANOL UNLOADING RACK**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-6-304	Y		21 gm/m ³ (0.17 lb/1000 gallons)		N	N	Continuous	
Ethanol throughput limit	BAAQMD Condition #23531, part 1	Y		52.56 MM gallon/yr	BAAQMD Condition #23531, part 3	P/M	Recordkeeping	Continuous	

**Table VII – F
 Applicable Limits and Compliance Monitoring Requirements
 S36 – OFF-SPECIFICATION FUEL UNLOADING RACK**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-2-301	N		Not more than 15 lb/day & 300 ppm		N	N	Continuous	
POC	SIP BAAQMD 8-2-301	Y		Not more than 15 lb/day & 300 ppm		N	N	Continuous	
Unloading event limit	BAAQMD Condition #23549, part 1	Y		10,950/yr	BAAQMD Condition #23549, part 3	P/M	Recordkeeping	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

**Table VII – G
 Applicable Limits and Compliance Monitoring Requirements
 FUGITIVE COMPONENTS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-18-301	N		General equipment leak ≤ 100 ppm	BAAQMD 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	BAAQMD 8-18-302	N		Valve leak ≤ 100 ppm	BAAQMD 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	BAAQMD 8-18-303	N		Pump and compressor leak ≤ 500 ppm	BAAQMD 8-18-401.2, 401.5, and 403	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	BAAQMD 8-18-304	N		Connection leak ≤ 100 ppm	BAAQMD 8-18- 401.5, 401.6	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	BAAQMD 8-18-305	N		Pressure relief valve leak ≤ 500 ppm	BAAQMD 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	BAAQMD 8-18-306.1	N		Essential equipment 8-18-503.1.2 leak must be <10,000 ppm and mass emissions must be determined within 30 days and APCO must be notified no less than 96 hours prior to mass emission measurements	BAAQMD 8-18-503.1.2	P/Q	Report	Continuous	

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**Table VII – G
 Applicable Limits and Compliance Monitoring Requirements
 FUGITIVE COMPONENTS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-18-306.2	N		Awaiting repair Valves $\leq 0.15\%$ Pressure Relief $\leq 0.5\%$ Pump and Connector $\leq 0.5\%$	BAAQMD 8-18-503	P/24 hours	Inspection	Continuous	
POC	BAAQMD 8-18-306.3.2	N		Mass emissions & non-repairable equipment allowed Valve ≤ 0.1 lb/day & $\leq 1.0\%$ Pressure Relief ≤ 0.2 lb/day & $\leq 5\%$ Pump and Connector ≤ 0.2 lb/day & $\leq 5\%$	BAAQMD 8-18-401.3	P/D	Inspection	Continuous	
POC	BAAQMD 8-18-306.3.4	N		Essential equipment is repaired or replaced within five years or at the next scheduled turnaround, whichever date comes first	BAAQMD 8-18-401.10, and 502.4	N	Mass emission sampling, records	Continuous	
POC	SIP 8-18-301	Y		General equipment leak ≤ 100 ppm	SIP 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

Table VII – G
Applicable Limits and Compliance Monitoring Requirements
FUGITIVE COMPONENTS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-18-302	Y		Valve leak \leq 100 ppm	SIP 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	SIP 8-18-303	Y		Pump and compressor leak \leq 500 ppm	SIP 8-18-401.2, 401.5 and 403	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	SIP 8-18-304	Y		Connection leak \leq 100 ppm	SIP 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	SIP 8-18-305	Y		Pressure relief valve leak \leq 500 ppm	SIP 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	SIP 8-18-306.1	Y		Valve, pressure relief, pump or compressor must be repaired within 5 years or at the next scheduled turnaround	SIP 8-18-502.4	P/Q	Report	Continuous	
POC	SIP 8-18-306.2	Y		Awaiting repair Valves \leq 0.5% Pressure Relief \leq 1% Pump and Connector \leq 1%	SIP 8-18-502.4	P/Q	Inspection	Continuous	

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**Table VII – G
 Applicable Limits and Compliance Monitoring Requirements
 FUGITIVE COMPONENTS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-18-306.3.2	Y		Mass emissions & non-repairable equipment allowed Valve \leq 0.1 lb/day & \leq 1.0% Pressure Relief \leq 0.2 lb/day & \leq 5% Pump and Connector \leq 0.2 lb/day & \leq 5%	SIP 8-18-502.4	P/D	Report	Continuous	
POC	SIP 8-18-306.3.3	Y		Total valve, pressure relief, pump or compressor leaks \geq 15 lb/day, they must be repaired within 7 days	SIP 8-18-502.4	P/D	Report	Continuous	
POC	40 CFR 63.11089	Y		Liquid or vapor leak	40 CFR 63.11089(a)	P/M	Inspection; recordkeeping	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

**Table VII - H
 Applicable Limits and Compliance Monitoring Requirements
 S33- EMERGENCY DIESEL GENERATOR**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
Opacity	BAAQMD 6-1-303.1	N		Ringelmann 2.0 for no more than 3 minutes in any hour	None	N		Continuous	
PM	BAAQMD 6-1-305	N		Visible Particles	None	N		Continuous	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	None	N		Continuous	
Opacity	SIP 6-303.1	Y		Ringelmann 2.0 for no more than 3 minutes in any hour	None	N		Continuous	
PM	SIP 6-305	Y		Visible Particles	None	N		Continuous	
FP	SIP 6-1-310	Y		0.15 gr/dscf		N		Continuous	
SO ₂	BAAQMD 9-1-301	Y		Property Line Ground Level Limits: < 0.5 ppm for 3 minutes and < 0.25 ppm for 60 min. and <0.05 ppm for 24 hours	None	N	N/A	Continuous	
	BAAQMD 9-1-304	Y		0.05% wt sulfur in liquid fuel		P/E	Fuel certification recordkeeping	Continuous	
Hours of Operation	BAAQMD 9-8-330.1	N		Unlimited hours for emergencies	BAAQMD 9-8-530.2	P/monthly	Record Keeping	Continuous	
	BAAQMD 9-8-330.3	N		50 hours per year for reliability-related activities	BAAQMD 9-8-530	P/monthly	Record Keeping	Continuous	
	CCR, Title 17,	N		20 hours/yr for maintenance	CCR, Title 17,	C	Non-resettable	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2024 through April 30, 2025

**Table VII - H
 Applicable Limits and Compliance Monitoring Requirements
 S33- EMERGENCY DIESEL GENERATOR**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
	Section 93115.6(b)(3)(A) (1)(a)			and testing	Section 93115.10(d)(1) and 10(f)(1)(B)	P/M	hour meter; records		
	40CFR 63.6640(f)(1)	Y		Unlimited hours for emergencies	40 CFR 63.6625(f) and 63.6655(f)(2)	C	Non-resettable hour meter; records	Continuous	
	40CFR 63.6640(f)(2)	Y		100 hours/yr maintenance checks, readiness testing; emergency demand response, and periods where there is a deviation of voltage or frequency of 5% or greater below standards	40 CFR 63.6625(f) and 63.6655(f)(2)	C	Non-resettable hour meter; records	Continuous	
	40CFR 63.6640(f)(3)			50 hours per year for non-emergency	40 CFR 63.6625(f) and 63.6655(f)(2)	C	Non-resettable hour meter; records	Continuous	
	BAAQMD Condition #22820, part1	N		20 hours/yr for maintenance and testing	BAAQMD Condition #22820, part 3 and 4	C P/M	Non-resettable hour meter; records	Continuous	
	BAAQMD Cond.# 22820, part2	Y		Unlimited hours for emergencies	BAAQMD Condition #22820, part 3 and 4	C P/M	Non-resettable hour meter; records	Continuous	