

 <b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING &amp; COMPLIANCE DIVISION</b> APPLICATION PROCESSING AND CALCULATIONS	PAGES 11	PAGE 1
	APPL. NO. <b>519868, 519869</b>	DATE 05/05/2011
	PROCESSED BY Jon Uhl	CHECKED BY

**PERMIT TO OPERATE**

**COMPANY NAME, LOCATION ADDRESS:**

DeMenno/Kerdoon, Inc., SCAQMD ID # 800037  
 2000 North Alameda Street  
 Compton, CA 90222

**EQUIPMENT DESCRIPTION:**

Permit to Operate :

**Section D of DeMenno/Kerdoon Facility Permit, ID# 800037**

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
<b>Process 7 : LOADING AND UNLOADING RACKS</b>					
<b>System 10 : USED GLYCOL LOADING (new)</b>					S1.13, S15.8
LOADING ARM, BOTTOM, TANK TRUCK, USED GLYCOL A/N: <b>519868</b>	D552				B22.5, E336.2, K67.4
PUMP, USED GLYCOL SHIPPING, AP-XXX, AIR-POWERED A/N: <b>519868</b>	D553				
<b>Process 9 : AIR POLLUTION CONTROL</b>					
<b>System 11 : VAPOR RECOVERY SYSTEM – ASPHALT FLUX LOADING RACK NO. 7 (modified)</b>					S15.2 S18.3
VAPOR RETURN LINE A/N: <del>493609</del> <b>519869</b>	C18	D318			
KNOCK OUT POT, KO-400, HEIGHT: 12 FT; DIAMETER: 3 FT A/N: <del>493609</del> <b>519869</b>	D318	C18			
KNOCK OUT POT, KO-401, HEIGHT: 10 FT; DIAMETER: 3 FT A/N: <del>493609</del> <b>519869</b>	D317				
POT, SEAL, SP-400, HEIGHT: 6 FT; DIAMETER: 2 FT A/N: <del>493609</del> <b>519869</b>	D316				
BLOWER, VACUUM, BL-707, 10 HP A/N: <del>493609</del> <b>519869</b>	D288	C142 C281			D90.6 K67.11

Device C142 = Process 9: System 7 -- Afterburner

Device C281 = Process 9: System 13 -- Afterburner

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F16.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Records of the monthly (and quarterly where applicable) inspections, and subsequent repair and reinspection of VOC fugitive components subject to District 1173.

**RULE 1173, 5-13-1994; RULE 1173, 2-6-2009**

S1.13 (new) The operator shall limit the loading rate to no more than 25,000 gallon(s) in any one calendar month.

The operator shall monitor the throughput of materials loaded, in gallons, by using certified truck scale records to determine the pounds of material loaded, and a measurement of the specific gravity or API gravity of the material loaded.

**RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997;**  
**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002**  
 [Systems subject to this condition: Process 7, System 10]

S15.2 The vent gases from all affected devices of this process/system shall be vented as follows:

All vent gases from this system shall be vented to the Afterburners (Process 9, Systems 7, 13).

This process/system shall not be operated unless at least one of the two afterburners is in full use and has a valid permit to receive gases from this system.

**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002;**  
**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002**  
 [Systems subject to this condition: Process 9, System 1, 2, 5, 8, 9, 11, 12]

S15.8 The vent gases from all affected devices of this process/system shall be vented as follows:

All vent gases under normal operating conditions shall be vented to the Vapor Recovery System– Asphalt Loading Rack No. 7 (Process 9, System 11).

This process/system shall not be operated unless the above vapor recovery system is in full use and has a valid permit to receive gases from this system.

**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002;**  
**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002**  
 [Systems subject to this condition: Process 7, System 8, 10]

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S18.3 All affected devices listed under this process/system shall be used only to receive, recover and/or dispose of vent gases routed from the system(s) or process(es) listed below, in addition to specific devices identified in the “connected to” column:

Asphalt Flux Loading – Rack No. 7 (Process: 7, System: 8)

(new) Used Glycol Loading (Process: 7, System: 10)

**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002;**  
**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002**  
 [Systems subject to this condition: Process 9, System 11]

B22.5 The operator shall only use this equipment with materials having a(n) Reid vapor pressure of 1.00 psia or less under actual operating conditions.

The operator shall sample the used glycol, from any of the devices subject to this condition, at least twice each calendar month, and test each sample for Reid vapor pressure (RVP) using SCAQMD-approved methods.

For compliance with this condition, the average of the RVP measurements for each calendar month shall be not greater than 1.00 psia.

**RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997;**  
**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002**  
 [Devices subject to this condition: D107, D108, D109, D110, D111, D112, D113, D336, D552]

D90.6 The operator shall periodically monitor the operation of the vacuum blower according to the following specifications:

The operator shall monitor once every day.

**RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997;**  
**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002;**  
 [Devices subject to this condition: D140, D195, D196, D197, D198, D284, D287, D288, D289]

E336.2 The operator shall vent the vent gases from this equipment as follows:

All vent gases shall be vented to the Vapor Return Line (Device C18).

This equipment shall not be operated unless the above vapor return line is in full use and has a valid permit to receive gases from this equipment.

**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002;**  
**RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]**  
 [Devices subject to this condition: D552]

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K67.4 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

- Materials loaded, unloaded, or stored.
- Throughput of materials loaded, unloaded, or stored.
- True vapor pressure measurements (if required).
- Reid vapor pressure measurements (if required).
- Temperature measurements (if required).
- Material Safety Data Sheets (if required).

**RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997;**  
**RULE 1303(b)(2)-Offset, 5-10-1996;** RULE 1303(b)(2)-Offset, 12-6-2002  
 [Devices subject to this condition: D552]

K67.11 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

- Monitoring, maintenance and repair of the vacuum blower.
- Records shall be kept and maintained for at least five years, and shall be made available to the Executive Officer or his authorized representative upon request.

**RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997;**  
**RULE 1303(a)(1)-BACT, 5-10-1996;** RULE 1303(a)(1)-BACT, 12-6-2002;  
 [Devices subject to this condition: D140, D195, D196, D197, D198, D284, D287, D288, D289]

**BACKGROUND:**

DeMenno/Kerdoon, Inc. (D/K, Facility ID #800037) operates a Title V, NOx-RECLAIM facility in the city of Compton. The initial Title V permit (A/N 334197) was issued on 7/1/2011.

This facility receives RCRA fuel, used oil, used glycol (antifreeze) and oily wastewater. These materials are delivered by truck and unloaded into fixed roof storage tanks. RCRA fuel is stored and consolidated into larger shipments for resale. Oil and antifreeze are processed into recycled products. Oily water is processed in an industrial wastewater treatment system, and discharged to Los Angeles County Sanitation Districts (LACSD). Recycled products are loaded into tanker trucks or drums for shipment. D/K operations are also subject to a permit issued by the California Department of Toxic Substance Control (DTSC).

At times, D/K may receive more used glycol than they can process for recycling, and therefore will load used glycol onto trucks for shipment to off-site storage. Application 519868 was submitted on March 15, 2011, for a new used glycol loading rack. Application 519869 was submitted on March 15, 2011, to modify the existing vapor recovery system (VRS – Asphalt Flux Loading Rack No. 7, Process 9, System 11, permitted under A/N 493609) to accept vapors displaced from tanker trucks during used glycol loading operations.

For the new used glycol loading rack, the applicant proposes the permit conditions:

1. A throughput limit of 25,000 gallons per calendar month.
2. Reid vapor pressure limit of 1.00 psia. Equal to the vapor pressure limit for used glycol unloading and storage at this facility.
3. Vent to an existing vapor recovery system and the facility afterburners.

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4. The same sampling and recordkeeping conditions as other loading racks at this facility. The Used Glycol Loading Rack is located near the A-series tanks storing used glycol at the east end of the D/K facility. This loading rack is more than 1000 feet from the outer boundary of the Jefferson Elementary School (located to the west of the D/K facility).

**PROCESS DESCRIPTION:**

The Used Glycol Loading Rack loads used glycol from the used glycol storage tanks into tanker trucks via one bottom loading arm using an air-powered diaphragm pump. All vapors from loading operations are routed to the afterburners (C142 & C281) via the vapor return line (C18) and Vapor Recovery System – Asphalt Flux Loading Rack No. 7 [P9:S11].

Used glycol loading throughput is limited to 25,000 gallons per calendar month and the Reid vapor pressure is limited to 1.00 psia. Ongoing sampling is required to demonstrate compliance with the vapor pressure limit. Throughput is monitored by using certified truck scale records and a measurement of the specific gravity or API gravity of the material loaded. Periodic monitoring and recordkeeping conditions are added for Title V permit compliance.

**FEE EVALUTION**

The fees paid for the application is:

**Table 1 – Application Fees Paid**

A/N	Equipment	BCAT/CCAT	Type	Status	Fee Schedule	Fees Required, \$	Fees Paid, \$
519868	Used Glycol Loading Rack, P7:S10	343102	10	20	B	2,094.60	2,094.60
519869	VRS – Asphalt Flux Loading Rack No. 7, P9:S11	04	50	20	B	2,094.60	2,094.60
522476	RECLAIM/Title V deMinimis Significant Revision	555009	86	21	--	1,723.07	1,723.07

**EMISSIONS CALCULATIONS:**

VOC emissions from bulk loading operations are calculated using eqn. 1 from EPA AP-42, Section 5.2.2.1.1 – Loading Losses.

$$L_L = (12.46) \times S \times P \times M / T$$

where:  $L_L$  = loading loss, in pounds per 1000 gallons of liquid loaded

$S$  = a saturation factor, from Table 5.2-1, AP-42

$P$  = true vapor pressure of the liquid loaded, in psia

$M$  = molecular weight of the vapors, in lb/lbmol

$T$  = temperature of the liquid loaded, in °R (°F + 460)

D/K utilizes submerged loading;  $S = 0.6$

The Reid vapor pressure limit is  $P = 1.00$  psia @ 100 °F

$M = 80$  lb/lbmol

The loading temperature is 100 °F;  $T = 560$  °R

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$$L_L = (12.46) \times (0.6) \times (1.00) \times (80) / (560) = 1.07 \text{ lb/1000 gal (uncontrolled)}$$

Total used glycol throughput is 25,000 gallons per calendar month. Overall control efficiency of the vapor recovery system and afterburners is 98%.

$$R1 = (1.07) \times (25.) = 26.70 \text{ lb/month} \quad R2 = R1(1 - 0.98) = 0.534 \text{ lb/month}$$

$$/30 = 0.89 \text{ lb/day} \quad /30 = 0.018 \text{ lb/day}$$

$$/24 = 0.037 \text{ lb/hr} \quad /24 = 0.00074 \text{ lb/hr}$$

Yorke Engineering supplied an estimate of the fugitive emissions from the loading rack components. Based on the SCAQMD default emission factors for fugitive components, one heavy liquid pump with double mechanical seals (80 lb/year) and two connectors (2 x 1.5 lb/year = 3 lb/year), fugitive emissions from the proposed loading system are 83 lb/year VOC (0.227 lb/day). The total VOC potential-to-emit is the sum of the loading losses and the fugitive emissions.

**Table 2 – VOC Potential-to-Emit from the Used Glycol Loading Rack**

	Uncontrolled Emissions	Controlled Emissions
Used glycol loading rack	235.4 lb/year	89.41 lb/year
Maximum RVP = 1.00 psia	0.645 lb/day	0.245 lb/day
Maximum throughput = 25,000 gal/month	0.027 lb/hr	0.010 lb/hr

**REVIEW OF COMPLIANCE DATABASE:**

On 5/5/2011, the AQMD Compliance Database shows five (5) outstanding Notices of Violation since July 1, 2005 (see Attachment #1). The NOV's do not apply to this new loading rack.

**RULES EVALUATION:**

**PART 1 STATE REGULATIONS**

<b>California Environmental Quality Act (CEQA)</b>	
	DeMenno/Kerdoon has submitted Form 400-CEQA, which indicated that this is not a significant project.

**PART 2 SCAQMD REGULATIONS**

<b>Rule 212</b>	<b>Standards for Approving Permits</b>	<b>November 14, 1997</b>
	This loading rack meets all the criteria in Rule 212 for permit approval. <b>Rule 212 public notice is not required.</b>	
212(a)	The loading rack was designed to operate without emitting air contaminants in violation of Division 26 of the State Health and Safety Code or in violation of AQMD's rules and regulations.	

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212(b)	Does not apply; there is no Permit to Construct.
212(c)(1)	The loading rack is not located within 1000 feet of a school. Rule 212 public notice is not required.
212(c)(2)	There is no VOC emission increase exceeding 30 lb/day.
212(c)(3)	This loading rack does not have an increased cancer risk greater than, or equal to, one in a million ( $1 \times 10^{-6}$ ) during a lifetime of 70 years or pose a risk of nuisance.

<b>Rule 401</b>	<b>Visible Emissions</b>	<b>November 9, 2001</b>
	Visible emissions are not expected under normal operation.	

<b>Rule 402</b>	<b>Nuisance</b>	<b>May 7, 1976</b>
	Nuisance complaints are not expected under normal operating conditions.	

<b>Rule 407</b>	<b>Liquid and Gaseous Air Contaminants</b>	<b>April 2, 1982</b>
407(a)(1)	Does not apply. CO emissions are not expected.	
407(a)(2)	Discharge of sulfur compounds in excess of 500 ppmv, calculated as sulfur dioxide, is not expected.	

<b>Rule 462</b>	<b>Organic Liquid Loading</b>	<b>May 14, 1999</b>
	This rule applies to loading organic liquids with a vapor pressure of 1.5 psia or greater under actual loading conditions into any tank truck, trailer, or railroad tank car.	
	Rule 462 does not apply to this loading rack; used glycol has a vapor pressure less than 1.00 psia under actual loading conditions.	

<b>Rule 1173</b>	<b>Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants</b>	<b>February 6, 2009</b>
1173(b)	<p><u>Applicability:</u> Rule applies; this facility is a lubricating oil and grease re-refiner.</p> <p>On Form 400A, D/K gives their primary NAICS code as 32191 – Petroleum Lubricating Oil and Grease Manufacturing. Per the NAICS Association website (<a href="http://www.naics.com">www.naics.com</a>), this is equivalent to a 1987 SIC code 2992 – Lubricating Oils and Greases. This facility is included in the definition of a “lubricating oil and grease re-refiner” given in Rule 1173(c)(15), which includes SIC code 2992.</p> <p>This loading rack is expected to comply with Rule 1173 given proper recordkeeping and inspections. Compliance with Rule 1173 requirements per condition F16.1.</p>	

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<b>REG XIII</b>	<b>New Source Review (NSR)</b>	<b>December 6, 2002</b>										
		<b>Application Deemed Complete: April 5, 2011</b>										
	<u>Emissions Summary – Criteria Pollutants</u>											
	<table border="1"> <thead> <tr> <th><b>Pollutant</b></th> <th><b>R1 (lb/hr)</b></th> <th><b>R1 (lb/day)</b></th> <th><b>R2 (lb/hr)</b></th> <th><b>R2 (lb/day)</b></th> </tr> </thead> <tbody> <tr> <td>ROG</td> <td>0.027</td> <td>0.645</td> <td>0.010</td> <td>0.245</td> </tr> </tbody> </table>		<b>Pollutant</b>	<b>R1 (lb/hr)</b>	<b>R1 (lb/day)</b>	<b>R2 (lb/hr)</b>	<b>R2 (lb/day)</b>	ROG	0.027	0.645	0.010	0.245
<b>Pollutant</b>	<b>R1 (lb/hr)</b>	<b>R1 (lb/day)</b>	<b>R2 (lb/hr)</b>	<b>R2 (lb/day)</b>								
ROG	0.027	0.645	0.010	0.245								
<b>1303(a)</b>	<p>BACT: This is a Class A tank truck bulk loading rack (&gt; 20,000 gal/day). BACT is controlled VOC emission less than (0.08 lb/1000 gallons loaded). Controlled VOC emissions from this loading rack are estimated to be (1.07 lb/1000 gallon loaded)(1 - 0.98) = (0.021 lb/1000 gal loaded). BACT for fugitive emission sources in heavy liquid (the boiling point of ethylene glycol is 197 °C) service is compliance with the AQMD Rule 1173. D/K has an ongoing Rule 1173 inspection &amp; maintenance program, and this loading rack is part of that program.</p>											
<b>1303(b)(1)</b>	<p>Modeling: Modeling for VOC is not required (Rule 1303, Appendix A); no further modeling analysis is required.</p>											
<b>1303(b)(2)</b>	<p>Offsets: No offsets are required; controlled VOC emission increase is less than 0.4 lb/day.</p>											
<b>1303(b)(3)</b>	<p>Sensitive Zone Requirements. ERC's are not required.</p>											
<b>1303(b)(4)</b>	<p>Facility Compliance. This facility complies with all applicable District rules and regulations.</p>											
<b>1303(b)(5)</b>	<p>Major Polluting Facilities. This is not a new major polluting facility or major modification at an existing major polluting facility. Therefore, the provisions of this paragraph do not apply to this equipment.</p>											

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<b>Rule 1401</b>	<b>New Source Review of Toxic Air Contaminants</b>	<b>September 10, 2010</b> <b>Application Deemed Complete: April 5, 2011</b>								
	<p>Total ROG emissions are estimated to be 89.41 lb/year. D/K supplied TAC emission factors, lbs TAC per lb ROG, for used glycol.</p> <table border="1"> <thead> <tr> <th>TAC Name</th> <th>Emission Factor (lbs/lb)</th> <th>Estimated emissions (lbs/year)</th> <th>Estimated emissions (lbs/hr)</th> </tr> </thead> <tbody> <tr> <td>Ethylene glycol</td> <td>1.00</td> <td>89.41</td> <td>1.02E-02</td> </tr> </tbody> </table> <p>The loading rack passes the Tier 1 Screening Risk Assessment at 25 meters (included in Attachment #2).</p> <p>Federal NSR for toxics does not apply since this loading rack is not located at a plant site that is a major source as defined in 40CFR63, Subpart A, §63.2. This facility emits less than 10 tons per year of any HAP and 25 tons per year of all hazardous air pollutants (HAPs).</p>		TAC Name	Emission Factor (lbs/lb)	Estimated emissions (lbs/year)	Estimated emissions (lbs/hr)	Ethylene glycol	1.00	89.41	1.02E-02
TAC Name	Emission Factor (lbs/lb)	Estimated emissions (lbs/year)	Estimated emissions (lbs/hr)							
Ethylene glycol	1.00	89.41	1.02E-02							

<b>Rule 1401.1</b>	<b>Requirements for New and Relocated Facilities Near Schools</b>	<b>November 4, 2005</b>
1401.1(b)	This is an existing facility.	

<b>REG XX</b>	<b>RECLAIM</b>	<b>May 6, 2005</b>
	D/K has been designated as a NO <sub>x</sub> RECLAIM facility. This loading rack does not emit NO <sub>x</sub> ; therefore, RECLAIM requirements do not apply.	

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REG XXX	Title V	November 5, 2011																														
	<p>D/K was issued a Title V permit effective on July 1, 2011. This is a <b>de minimis significant permit revision</b> as defined in Rule 3000(b)(7), where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAP) from all de minimis significant permit revisions during the term of the Title V permit are not greater than the threshold levels given in this rule.</p> <table border="1"> <thead> <tr> <th>Air Contaminant</th> <th>Prior revisions</th> <th>This revision</th> <th>Total</th> <th>Threshold level</th> </tr> </thead> <tbody> <tr> <td>HAP</td> <td>0.</td> <td>0.</td> <td>0.</td> <td>30. lb/day</td> </tr> <tr> <td>VOC</td> <td>0.</td> <td>0.25</td> <td>0.25</td> <td>30. lb/day</td> </tr> <tr> <td>PM10</td> <td>0.</td> <td>0.</td> <td>0.</td> <td>30. lb/day</td> </tr> <tr> <td>CO</td> <td>0.</td> <td>0.</td> <td>0.</td> <td>220. lb/day</td> </tr> <tr> <td>SOx</td> <td>0.</td> <td>0.</td> <td>0.</td> <td>60. lb/day</td> </tr> </tbody> </table>		Air Contaminant	Prior revisions	This revision	Total	Threshold level	HAP	0.	0.	0.	30. lb/day	VOC	0.	0.25	0.25	30. lb/day	PM10	0.	0.	0.	30. lb/day	CO	0.	0.	0.	220. lb/day	SOx	0.	0.	0.	60. lb/day
Air Contaminant	Prior revisions	This revision	Total	Threshold level																												
HAP	0.	0.	0.	30. lb/day																												
VOC	0.	0.25	0.25	30. lb/day																												
PM10	0.	0.	0.	30. lb/day																												
CO	0.	0.	0.	220. lb/day																												
SOx	0.	0.	0.	60. lb/day																												
	Rule 3000 (b)(15)(A)(i)	This revision does not require or change a case-by-case evaluation of: reasonably available control technology (RACT) pursuant to Title I of the federal Clean Air Act; or maximum achievable control technology (MACT) pursuant to 40 CFR Part 63, Subpart B.																														
	(b)(15)(A)(ii)	This revision does not violate a regulatory requirement.																														
	(b)(15)(A)(iii)	This revision does not require any significant change in monitoring terms or conditions in the permit.																														
	(b)(15)(A)(iv)	This revision does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit.																														
	(b)(15)(A)(vii)	This revision does not result in an increase in GHG emissions of >75,000 tpy CO <sub>2</sub> e.																														
	(b)(15)(A)(viii)	This revision does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement.																														
	(b)(15)(A)(ix)	This revision is not an installation of a new permit unit subject to a New Source Performance Standard (NSPS) pursuant to 40 CFR Part 60, or a National Emission Standard for Hazardous Air Pollutants (NESHAP) pursuant to 40 CFR Part 61 or 40 CFR Part 63.																														
	(b)(15)(A)(x)	This revision is not a modification or reconstruction of an existing permit unit, resulting in new or additional NSPS requirements pursuant to 40 CFR Part 60, or new or additional NESHAP requirements pursuant to 40 CFR Part 61 or 40 CFR Part 63.																														
	A de minimis significant permit revision is subject to a <b>45-day EPA review</b> , Rule 3003(j) and not subject to public participation requirements, Rule 3006(b).																															

 <b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING &amp; COMPLIANCE DIVISION</b> APPLICATION PROCESSING AND CALCULATIONS	PAGES 11	PAGE 11
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	PROCESSED BY Jon Uhl	CHECKED BY

**PART 3 FEDERAL REGULATIONS**

<b>40CFR Part 61</b>	<b>Subpart FF - National Emission Standard for Benzene Waste Operations</b>
§61.340	<u>Applicability</u> (a) This facility is not a chemical manufacturing plant, coke by-product recovery plant or petroleum refinery as defined in §61.341. (b) This facility does not treat, store or dispose of hazardous waste generated by any facility listed in paragraph (a). 40 CFR 61 Subpart FF does not apply to this facility.
<b>40CFR Part 63</b>	<b>Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries</b>
	<b>Subpart DD - National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations</b>
	<b>Subpart EEEE—National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline)</b>
	<u>Applicability</u> - This facility is not a major source as defined in section 112(a) of the Clean Air Act or 40CFR §63.2. This facility emits less than 25 tons per year of all hazardous air pollutants (HAPs) listed in table 1 of this subpart, and less than 10 tons per year of any one HAP; therefore, this facility is not subject to the provisions of these regulations.

**CONCLUSION**

Based on the above evaluation, it is recommended that the following be issued:

A/N	Recommendation
519868	Issue Permit to Operate (PO) with conditions listed in the Conditions Section; include modification in the de minimis significant revision to the Title V/RECLAIM facility permit (A/N 522476)
519869	Issue Permit to Operate (PO) with conditions listed in the Conditions Section; include modification in the de minimis significant revision to the Title V/RECLAIM facility permit (A/N 522476)

**List of Attachments**

1. AQMD Compliance Database (5/5/2011)
2. Rule 1401 Tier 1 Screening Risk Assessment
3. BACT Guideline for Liquid Transfer and Handling
4. BACT Guideline for Fugitive Emission Sources at Organic Liquid Bulk Loading Facilities