

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b>  <b>PERMIT APPLICATION EVALUATION AND CALCULATIONS</b>	PAGES 5	PAGE 1
	APPL NO 529366-7	DATE 7-23-12
	PROCESSED BY LLD	CHECKED BY

**OWNER/OPERATOR:**

COID: 800022  
CALNEV PIPE LINE, LLC  
1100 TOWN AND COUNTRY ROAD  
ORANGE, CA 92868

CONTACT PERSON            YIJIN WANG  
(714) 560-4886

CONSULTANTS:            YORKE ENGINEERING  
CONTACT: PAUL LIAO  
ENVIRONMENTAL ENGINEER  
(949) 573-1859

**EQUIPMENT LOCATION:**

CALNEV PIPELINE, LLC  
2051 E. SLOVER AVENUE  
BLOOMINGTON, CA 92316

FACILITY CONTACT:    GENE CONGIARDO  
AREA MANAGER  
(909) 873-5153

**EQUIPMENT DESCRIPTION**

<i>Application No.</i>	<i>Equipment</i>	<i>Action</i>
529366	TV Revision	De Minimus Significant Revision
529367	Storage Tank CN-132	Add thruput and vapor pressure, add guidepole, remove sampling hatch, add list of allowable commodities

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**INTRODUCTION/BACKGROUND:**

This is an existing facility applying for a Title V revision. Initial TV was issued 4/16/01 under A/N 332609 with subsequent revisions.

Calnev Pipe Line, LLC operates a tank farm and a pipeline terminal in Bloomington, CA. The facility is called a pipeline breakout station that receives petroleum products, such as gasoline, diesel, and jet / turbine fuel, via pipelines from the KinderMorgan Carson facility, then transfers the products to pipelines serving the Southern California Mojave Desert region and Southern Nevada. This facility is operating fixed roof storage tanks, internal floating roof storage tanks, external floating roof storage tanks, underground storage tanks, domed external floating roof tanks, and a thermal oxidizer to control emissions from the operation of the storage tanks.

This application was submitted 11-15-11 as Class I for a modification to an existing storage tank permitted under A/N 407884 (F75585) by adding a guidepole and removing a sampling hatch. Current permit has no thruput or vapor pressure condition (although permit wording states “gasoline and diesel”), so thruput and vapor pressure will also be added at this time as well as a list of commodities.

**HISTORY/PROJECT DESCRIPTION:**

Storage tank is a domed, external floating roof tank for gasoline and diesel storage.

Hours of operation are 24 hr/day, 7 days/week, 12 months/yr

There have been no complaints or Notices to Comply within the past three years. There is a Notice of Violation on 8/12/11 for exceedance of VOC above 30% LEL in tank 131. Facility is currently in compliance.

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**CALCULATIONS:**

**TANK CN-132**

Appl. No. Tank ID	Prev. A/Ns	PreMod	PostMod
529367  Tank CN-132	407884 (R1178 doming Mar 2005)  254617  01314E	Domed External Float Roof Cat A mech shoe primary Cat A Wiper sec seal  Gasoline, diesel in description Form 400-E-18: Max RVP = 13.5 psia Max rating = 15,000 bbl/hr (or 365 turn/yr assumed)	Domed External Float Roof Cat A mech shoe primary Cat A Rim mounted sec seal <u>(different fittings)</u>  RVP = 13.5 psia (add petroleum distillates, diesel, biodiesel blend stock, biodiesel) Thruput = 295 turn/yr = 245,833.3 bbl/mo
Emission from Tank Program		136.7 lb/mo(Aug)  0.19 lb/hr 4.62 lb/day (30-day) 1525.14 lb/yr	151.2 lb/mo(Aug)  0.21 lb/hr 5.03 lb/day (30-day) 1662.7 lb/yr
Increase			<b>+ 0.41 lb/day</b>

PreMod emissions are based on max rated capacity (assumed to be 365 turn/yr) due to R1178 doming in 2005 as per R1306(f).

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Toxics Emissions

Toxic air contaminants are quantified by multiplying the VOC emissions calculated above by the representative weight fractions of toxics present in gasoline. The representative weight fractions are from Table 11.3-2 of Volume 3 of the USEPA's Emissions Inventory Improvement Program Document Series (January 2001) and are as follows:

Annual VOC emissions are conservatively estimated at 1663 lb/yr

TAC Emissions

TAC	Wt.% in Vapor	Emissions, lbs/yr	Emissions, lb/hr
Benzene	0.9	15.0	0.00171
Ethyl benzene	0.10	1.66	0.00019
n-Hexane	1.6	26.6	0.00304
Toluene	1.3	21.62	0.0025
Xylenes	0.50	8.32	0.00095
Naphthalene	0.05	0.832	0.00009

In accordance with the procedures prescribed in the District's Risk Assessment Procedures for Rules 1401 and 212, a Tier 2 Screening Modeling analysis was performed (see Excel Spreadsheet Tier 2 Screening Risk Assessment).

Assume: Point Source  
Urban Option  
Residential/school = 305 m = 1000 ft (From CalNev Map)  
Commercial = 244 m = 800 ft (from CalNev Map)  
H = 40 ft.

The results indicate that the MICR for the residential receptor is 2.29E-08 and for the worker is 8.63E-09. Thus, the MICR is less one in one million and each chronic and acute index is also well below the threshold limit of 1.0.

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**RULES and EVALUATION:**

Rules:

- 212: Public notice is not required.
- 401: Visible emissions are not expected.
- 402: Nuisance is not expected with proper operational procedures and mitigation measures.
- 463: This tank has Cat A primary and secondary seals and meets all other applicable requirements of this rule. Compliance with this rule is expected.

1178: This EFR Tank was domed in 2005. Compliance expected.

Reg 13: BACT – Not applicable since emission increase is less one pound per day.

Offsets: - Not applicable since emission increase is less than 0.5 lb/day.

1401: Based on Tier 2, the risk (residential and commercial) is less than the one in a million. Hazard Indices (based on Tier 3) are less than one.

40 CFR 60 Subpart Kb: This tank is not subject to Kb, since the tank was constructed prior to 1984, subsequent modifications (doming) resulted in no emission increase, and reconstruction capital costs of roof fittings do not exceed cost thresholds.

40 CFR 63 Subpart R: This facility has been determined to be a minor source of HAP. Thus, it is required to only record and report as stated in Section J of this facility's Title V permit.

40 CFR 63 Subpart BBBBBB: This facility is subject to this subpart as stated in Section D – Facility Wide Conditions and in Section J of this facility's Title V permit. This tank is expected to comply with all applicable requirements.

Title V: This is a De Minimus Significant revision to the facility's existing TV permit and will be subject to 45-day EPA review period.

**CONCLUSION:**

This project will meet all District Rules and Regulations. It is recommended that a Permit to Construct/Operate be granted subject to the attached conditions after completion of the 45 day EPA Notice.