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OWNER/OPERATOR:

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ORANGE, CA 92868

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(714) 560-4886

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427 9TH STREET
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PRINCIPAL
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EQUIPMENT LOCATION:

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BLOOMINGTON, CA 92316

CONTACT: BILL TOEPFER
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EQUIPMENT DESCRIPTION

<i>Application No.</i>	<i>Equipment</i>	<i>Action</i>
449689	TV Renewal	TV Renewal
449690	CAM Plan	Approve CAM Plan

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INTRODUCTION/BACKGROUND:

This is an existing facility applying for a Title V permit renewal. Initial TV was issued 4/16/01 under A/N 332609 with subsequent revisions. Application for renewal (A/N 449689) was submitted 10/18/05.

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. A soil vapor extraction system for remediation of contaminated soil was recently issued a permit, but system is currently not yet in operation (system started up June 23, 2011, operated for three days and shut down).

Along with this TV renewal application, there is also an application for a CAM Plan (A/N 449690).

APPLICABLE NSPS/NESHAP RULES:

40 CFR 60 Subpart Ka

40 CFR 60 Subpart Kb

40 CFR 63 Subpart R (Minor Source)

40 CFR 63 Subpart BBBBBB (applicable since initial TV issued)

40 CFR 64 (CAM)

RECOMMENDATION:

Issue a TV renewal after 30-day public comment period and 45 day EPA review period. Include CAM Plan with this renewal.

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A/N 449690 CAM Plan

INTRODUCTION:

Application no. 449690 was submitted on October 14, 2005 to comply with the requirements of 40 CFR 64, Continuous Assurance Monitoring (CAM).

The CAM rule contains specific federal monitoring requirements for process equipment which is vented by air pollution control systems where the facilities are major sources, as defined in Title V (Reg 30).

A 5 MMBtu per hour VRS thermal oxidizer identified under A/N 461447:G8424 is the air pollution control equipment venting VOC emissions from the operation of storage tanks, waste water separators and station sumps. A source test conducted on the thermal oxidizer on December 13, 2004 showed a VOC control efficiency of 99.9%.

Additionally, a 250 scfm (400,000 btu/hr) soil vapor extraction (SVE) system (with thermal and catalytic oxidizer) is subject to CAM requirements (A/N 512090:G12871).

A permit condition (as shown on the "Recommendation" section below will be imposed on both the VRS thermal oxidizer and the SVE unit to comply with the requirements of 40 CFR 64, Continuous Assurance Monitoring, (CAM).

CAM REQUIREMENTS:

A CAM plan must:

- a. Describe the indicators to be monitored;
- b. Describe the ranges or the process to set indicator ranges;
- c. Describe the performance criteria for the monitoring, including
 - specifications for obtaining representative data
 - verification procedures to confirm the monitoring's operational status
 - quality assurance and control procedures
 - monitoring frequency
 - 4 times per hour (minimum) if post control emissions are equal to or exceed the major source threshold
 - 1 time per day (minimum) if post control emissions are less than the major source threshold
 - data averaging period;
- d. Provide a justification for the use of parameters, ranges, and monitoring

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- approach;
- e. Provide emissions test data; and, if necessary,
 - f. Provide an implementation plan for installing, testing, and operating the monitoring.

Permits are required to have the following items:

- a. The approved monitoring approach, including the indicators - or the means to measure the indicators - to be monitored;
- b. A definition of exceedances or excursions;
- c. The duty to conduct monitoring;
- d. Minimum data availability and averaging period requirements; and
- e. Milestones for testing, installation, or final verification.

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MAJOR SOURCE THRESHOLDS:

The applicable Major Source Threshold (MST) in this case is VOC with the following controlled and uncontrolled emissions. Controlled emissions are based on permit conditions limiting VOC emissions. The emission levels (maximum annual PTE) attributed to the subject sources, and the corresponding minimum monitoring intervals are indicated in the following table:

Evaluation of Monitoring Requirements

Device	A/N and/or P/O	VOC, R1, tons/year (max PTE)	VOC, R2, tons/year (max PTE)	MST tons/year	Proposed Monitoring Requirement
VRS Thermal Oxidizer	461447 (G8424)	255.5	12.8 (@95% DRE)	10	Continuous monitoring of combustion chamber temperature
SVE	512090 (G12871)	223.6	2.2 (@99% DRE)	10	Continuous monitoring of combustion chamber temperature

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“Applicable” Regulations, Emission Limits, and Monitoring Requirements

PSEU and CONTROL DEVICE	RULES	CONTAMINANT	CONTROLLED EMISSIONS LIMIT
VRS Thermal Oxidizer (venting storage tanks)	1303(b)(2)-Offsets	VOC	70 lb/day

“Applicable” Regulations, Emission Limits, and Monitoring Requirements

PSEU and CONTROL DEVICE	RULES	CONTAMINANT	CONTROLLED EMISSIONS LIMIT
Soil Vapor Extraction (extraction wells and blower venting to thermal/catalytic oxidizer)	1303(b)(2) (offsets)	VOC	12.3 lb/day

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MONITORING APPROACH

The key elements of the monitoring approach are presented below:

A. Indicators

Minimum combustion chamber temperature of 1400 degrees Fahrenheit in the VRS thermal oxidizer.

Minimum combustion chamber temperature of 1400 degrees Fahrenheit in the SVE thermal oxidizer.

Minimum combustion chamber temperature of 600 degrees Fahrenheit in the SVE catalytic oxidizer.

B. Measurement Approach

Temperature measuring and recording system to continuously measure and record the combustion chamber temperature with an accuracy of within 1% of the temperature being monitored

C. Indicator Range

The operator shall review the records of the combustion chamber temperature on a daily basis to determine if deviation occurs or install an alarm system to alert the operator when a deviation occurs. Whenever a deviation occurs, the operator shall inspect the equipment to identify the cause of such a deviation, take immediate corrective action to maintain the combustion temperature at or above 1400 (or 600) degrees Fahrenheit and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

D. QIP Threshold

The semi-annual monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period. The operator shall submit an application with a Quality Improvement Plan (QIP) if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period. The required QIP shall be submitted to the AQM D within 90 calendar days after the due date for the semi-annual monitoring report.

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E. Performance Criteria

Data Representativeness:	The temperature measuring and recording system to continuously measure and record the combustion chamber temperature of the equipment.
Verification of Operational Status:	The temperature measuring and recording system shall have an accuracy of within 1% of the temperature being monitored and shall be inspected, maintained and calibrated on an annual basis.
QA/QC Practice and Criteria:	The temperature measuring and recording system shall be inspected, maintained and calibrated on an annual basis.
Monitoring Frequency and Data Collection Procedure:	The temperature measuring and recording system continuously measures and records the combustion chamber temperature of the equipment.

RECOMMENDATION

Approve CAM Plan under A/N 449690, include 40 CFR 64 in Section I, and add/update with the following condition(s) to A/N 461447 and A/N 512090.

Condition (A/N 461447) VRS

The operator shall operate and maintain this equipment according to the following requirements:

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The combustion chamber temperature shall be maintained at a minimum of 1,400 degrees Fahrenheit whenever the equipment it serves is in operation.

The operator shall operate and maintain a temperature measuring and recording system to continuously measure and record the combustion chamber temperature pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such a system shall have an accuracy of within 1% of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications using an applicable AQMD or EPA approved method.

For the purpose of this condition, a deviation shall be defined as when a combustion chamber temperature of less than 1,400 degrees Fahrenheit occurs during normal operation of the equipment it serves. The operator shall review the records of the combustion chamber temperature on a daily basis to determine if a deviation occurs or shall install an alarm system to alert the operator when a deviation occurs.

Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective action to maintain the combustion chamber temperature at or above 1,400 degrees Fahrenheit, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

All deviations shall be reported to the AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit. The semi-annual monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of this permit.

The operator shall submit an application with a Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

The operator shall keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[RULE 463, 1303(b)(2)-Offsets,3004(a)(4)-Periodic Monitoring, 40CFR Part 64]

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Condition (A/N 512090) SVE

The operator shall operate and maintain this equipment according to the following requirements:

Whenever the thermal oxidizer is in operation, the temperature at the outlet of the combustion chamber shall not be less than 1400 degrees Fahrenheit.

Whenever the catalytic mode is in operation, the temperature at the inlet of the catalytic module shall not be less than 600 degrees Fahrenheit.

The operator shall operate and maintain a temperature measuring and recording system to continuously measure and record the temperature at the outlet of the thermal oxidizer combustion chamber and the temperature at the inlet and outlet of the catalyst bed pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such a system shall have an accuracy of within 1% of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications using an applicable AQMD or EPA approved method. The recorder shall record the instantaneous temperature at least once every 15 minutes or record 15-minute or more frequent block averages. In addition, the recording device shall record hourly average and daily average combustion chamber temperatures.

For the purpose of this condition, a deviation shall be defined as when a combustion chamber temperature of less than 1,400 degrees Fahrenheit occurs during normal thermal mode operation, or a temperature of less than 600 degrees Fahrenheit occurs during normal catalytic mode operation, of the equipment it serves. The operator shall review the records of the combustion chamber temperature on a daily basis to determine if a deviation occurs or shall install an alarm system to alert the operator when a deviation occurs.

Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective action to maintain the combustion chamber temperature at or above 1,400 (thermal mode) or 600 (catalytic mode) degrees Fahrenheit, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

All deviations shall be reported to the AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit. The semi-annual monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of this permit.

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The operator shall submit an application with a Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

The operator shall keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[RULE 1303(b)(2)-OFFSETS, 1401; RULE 3004(a)(4)-Periodic Monitoring, 40CFR Part 64]