South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Issue Date: 08/19/2011

Facility Name:	ConocoPhillips/ Colton Terminal West
Facility ID:	800364
SIC Code:	5171
Equipment Location:	2301 S Riverside Avenue Bloomington, CA 92316
Application #(s):	449725
Application Submittal Date(s):	1/18/2005
Permit Revision #:	5
Revision Date:	TBD
Permit Section(s) Affected:	All
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all the rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO_2, SO_2, CO and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of ConocoPhillips/Colton Terminal West located at 2301 S. Riverside Avenue, Bloomington CA 92316. This facility is subject to Title V requirements because it is a major source and is subject to certain NSPS (New Source Performance Standards) and NESHAP (National Emission Standards for Hazardous Air Pollutants) requirements that specifically require obtaining a Title V permit.

2. Facility Description

This is an existing facility that is applying for a Title V permit renewal. This is a bulk terminal and fuel distribution facility. Products such as gasoline and diesel are stored in a series of storage tanks. The facility also operates gasoline and diesel racks, wastewater/storm water treatment systems and a vapor recovery system.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit since 2001. Numerous permits to construct and permits to operate have been issued to the facility. An initial Title V permit was issued to the facility on April 6, 2001 and subsequent revisions were issued on October 10, 2002, January 28, 2004, December 22, 2006, and November 28, 2007.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. NSPS requirements of 40 CFR Part 60 apply to certain units at the facility and the permit terms and conditions may be found in Section D of the Title V permit. NESHAP requirements of 40 CFR Part 63 apply to certain units at the facility and the permit terms and conditions may be found in Sections D and J of the Title V permit.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable

Grain Loading Standards in the SIP (July 2001). Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply to any of the permitted emission sources at this facility.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2010

Pollutant	Emissions (tons/year)
NOx	0
CO	0
VOC	5.6
PM	0
SOx	0

Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2010

The Following TACs Were Reported	Emissions (lbs/yr)
Benzene	40.8
Napthalene	6.8

Health Risk from Toxic Air Contaminants

The facility is not subject to review by the Air Toxics Information and Assessment Act (AB2588).

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 2001. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed, no Notices to Comply issued, and no Notices of Violation issued in the last two calendar years. The facility is currently operating in compliance with all applicable rules and regulations.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.

10. Comments

Since the issuance of the initial Title V permit, the facility is now subject to 40 CFR Part 63 Subpart BBBBBB (Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities). In addition, it has been determined that the requirements of 40CFR79, 40CFR80 and Title 13 of the California Code of Regulations do not apply to this facility and have been removed. The proposed permit incorporates these changes in Sections D and K.