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**RECLAIM/TITLE V ANALYSIS**

**COMPANY NAME**

SFPP, L.P.

**AEIS NUMBERS:**

800129

**PERMITEE/OPERATOR**

SAME AS FORM 400A

**EQUIPMENT LOCATION**

SAME AS FORM 400A

**Applications(s):**

See Below

**EQUIPMENT DESCRIPTION**

See proposed permit for description and conditions.

**BACKGROUND**

This facility is a bulk loading terminal located in Bloomington, California (SCAQMD facility ID No. 800129). The initial Title V permit was issued on February 10, 2009. Total facility annual Nox emissions have consistently exceeded 4 tons. SFPP, L.P, filed application No. 530640 on January 4, 2012, to request inclusion in the SCAQMD Nox RECLAIM program, because the SCAQMD pursuant to Rule 2001(f) requires the facility to file an application to enter the NOx RECLAIM program.

**PROCESS DESCRIPTION**

This bulk loading terminal receives gasoline and diesel fuel through a pipeline from refineries located in Southern California, and operates bulk loading stations to transfer product into tanker trucks. The VOC emission from the loading racks are vented to a vapor control system equipped with a thermal oxidizer. The thermal oxidizer combusts organic liquid vapors and a small amount of propane (pilot fuel) which results in Nox Emissions. The thermal oxidizer is identified as a NOx Major Source (Device C76).

In addition, transmix which is a blend of gasoline and diesel, is processed at the facility. The gasoline is separated from the diesel using a flash distillation process. Off gas from the process is mixed with natural gas and burned in a process heater as fuel, which results in NOx emissions. The transmix heater is identified as a NOx Large Source (Device D69).

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**EMISSIONS**

There is no change in emissions from the proposed permit revision, since there are no equipment modifications or changes to permit conditions limiting fuel usage or throughput of bulk organic liquids transferred through this facility.

**EVALUATION**

**Rule 212**

This facility is not located within 1000 feet of a school, and there is no increase in the emissions of criteria pollutants. Therefore, no public notice is required by this rule.

**Rules 1303/1401 - BACT, Offsets, Modeling and Risk Assessment**

Since the proposed revision is only to incorporate the facility into the NOX RECLAIM program, there is no increase in the emissions of VOC, Sox, PM 2.5, PM10, or Toxic Air Contaminants emissions. Therefore, there is no offset, BACT analysis, or Modeling required under Regulation XIII or Risk assessment under Rule 1401.

**Regulation XX**

The final Nox Allocation will be determined based on the most recent two year Annual Emission Reports and Rule 2002 emission factors in Table 1

This facility will follow the monitoring, Record Keeping, and Reporting Requirements of Rules 2004, and 2012. CEMS, and other monitoring equipment will be installed and certified no later than 12 months after entry in to RECLAIM.

**Regulation XXX**

Since there is no increase in emissions, and the proposed monitoring, record keeping, and reporting conditions are more stringent or equivalent to the existing permit, the proposed permit revision is classified as "Minor" and subject to a 45 day review period.

**RECOMMENDATION**

Issue a minor Title V facility permit revision subject to a 45 day EPA review period.