

South Coast Air Quality Management District

Statement of Basis

Proposed Renewal of Title V Permit

Issue Date: October 31, 2014

Facility Name: Phillips 66 Pipeline LLC
Facility ID: 171326
SIC Code: 5171
Equipment Location: 13500 Broadway Avenue,
Los Angeles, CA 90061

Application #(s): 555640
Application Submittal Date(s): August 21, 2013

Permit Revision #: renewal
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 federal 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 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. CO, NO₂, SO₂, and lead are in attainment with federal standards. The status for PM-10 is attainment at the Federal level and nonattainment at the state level. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of Phillips 66 Pipeline LLC, located at 13500 S. Broadway Avenue, Los Angeles, California. This facility is subject to Title V requirements because it is a major source and is subject to certain NSPS (New Source Performance Standards). There are no permit units subject to Rule 462 CAM (Compliance Assurance Monitoring) requirements.

2. Facility Description

Phillips 66 Pipeline LLC is a Title V facility which operates a bulk gasoline terminal. This facility is operating storage tanks, bulk loading/unloading racks, soil vapor extraction and treatment systems, and vapor recovery systems.

3. Construction and Permitting History

The initial Title V permit for this facility was issued by US EPA – Region IX to Phillips 66 Pipeline LLC, on March 16, 2009. The Title V facility permit was revised on May 26, 2011, to make minor changes to two storage tanks, and then revised on July 10, 2013 because of a change of ownership from Conoco Phillips Co., LA Terminal to Phillips 66 Pipeline LLC. A revision occurred on December 19, 2014, to revise the periodic monitoring conditions of the VRUs.

4. Regulatory Applicability Determinations

The legal requirements applicable to the operations at this facility 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 40CFR60 Subpart Kb (Storage Tank, Greater than 19,815 Gallon Capacity) and 40CFR60 Subpart XX (Bulk Gasoline Terminals), and NESHAP requirements of 40 CFR Part 63 Subpart R (Minor Sources), and 40 CFR Part 63 Subpart BBBBBB (Bulk Gasoline Terminals), apply to this facility.

5. Monitoring and Operational Requirements

The monitoring and operational requirements which are applicable to the equipment operated at this facility are identified in the Title V permit (for example, Section D, F, and Appendix B of

the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations.

6. Permit Features

Permit Shield

This facility has not applied for a 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, additional applications need to be submitted for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c).

Streamlining Requirements

This facility has not applied for any streamlined conditions. Some emission units may be subject to multiple requirements which are closely related or redundant. These 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.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2013

Pollutant	Emissions (tons/year)
CO	0.004
NO _x	0.178
ROG	25.272
SO _x	0.006

Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2013

The Following TACs Were Reported	Emissions (lbs/yr)
Benzene	161.017
Ammonia	49.359
1,3-Butadiene	0.001
Formaldehyde	1.985
Naphthalene	9.693
PAHs, total	0.002

Health Risk from Toxic Air Contaminants

The facility is determined to be subject to the Air Toxics Information and Assessment Act (AB2588). AQMD is Tracking Status of Facility under AB2588.

8. Compliance History

As noted, the facility has been in constant operation since 1980. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed, no Notice to Comply issued, and no Notice of Violation issued in the last two calendar years.

9. Compliance Certification

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

10. Comments

None.