**OWNER/OPERATOR:**

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**APPLICATIONS IN THIS BATCH**

A/N 558802: OIL WATER SEPARATOR
A/N 558809: RECLAIM (NOx)/TV REVISION (MINOR)
A/N 561284: SUMP TANK
(see draft permit(s))

**INTRODUCTION:**

This facility is a NOx RECLAIM/TV facility.

SFPP Colton functions as bulk loading/unloading and pipeline transfer station. It delivers petroleum products via loading racks and pipelines to customers in the southeast California region. The company receives petroleum products from three in-bound pipelines from its Watson station that is part of the pipeline distribution network from Los Angeles refineries.

These applications were submitted as follows:

| A/N | Previous A/N : P/O | Equipment | Reason for application |
|---|---|---|---|
| 558802 | 197136: D38517<br>(C/O 1989)<br>(Devices D53 and D54)<br><br>164569 (P/C 1988)<br>"Fixed Roof" Calc sheet:<br>3000 gal/yr avg<br>10 gal/day actual<br>1000 gal/day max<br>ROG = 1 lb/day (NSR) | Oil-Water Separator | Add 2 filters, 2 surge tanks, 2 carbon vessels and a pump on water side/effluent side of OWS.<br><br>Add throughput limitation<br><br>Add recordkeeping<br><br>Remove requirement for turbity meter/hydrocarbon sensor |
| 558802 | | RECLAIM/TV Facility Permit | TV Revision (De Minimus Significant) |
| 561284 | 334958: F10890<br>(C/O)<br>(Device D55)<br>NSR ROG = 0 lb/day<br><br>314181:N03778<br>NSR ROG = 0 lb/day<br>= 245 lb/yr<br>(based on AQMD AER underground tank EF) | Sump/Spill Tank | Add submergible pump to pump water directly from sump to OWS (instead of utilizing vacuum truck).<br><br>Remove vapor pressure record keeping (this is a typo since it was not required under original P/O) |

There have been 2 NOV's and 1 NC issued within the last two years for this facility. Facility is currently in compliance.

There are no schools within 1000 feet of this facility.

# A/N 558802
# Oil Water Separator

## HISTORY/BACKGROUND:

This application (A/N 558802) was submitted 12/10/13 as a modification to A/N 197136 to add filters, surge tanks, pump and liquid phase carbon to the effluent of the OWS prior to discharge in order to remove hydrocarbons and improve water quality.

## CALCULATIONS:

Oil Water Separator : From "AP-42, Section 5.1 Table 5.1-2 Fugitive Emissions Factors for Petroleum Refineries (1/95)- EF = 0.2 lb VOC/1000 gal wastewater (oil/water separators – covered/controlled emissions). Assume 1000 gal/day (max) throughput as per A/N 164569 Fixed Roof Tank Calc sheet (or 365000 gal/yr) for PreMod throughout and 5819 gal/day (177,000 gal/mo = 2,124,000 gal/yr for PostMod (so that OWS emissions are below one pound per day threshold):

PreMod VOC R1=R2 = 0.2 lb/1000 gal wastewater * 365000 gal/yr
= 73 lb/yr
*1/12 = 6.08 lb/mo
*1/360 = 0.203 lb/day (30-day avg)
*1/365 = 0.2 lb/day
*1/24 = 0.0083 lb/hr

PostMod VOC R1=R2 = 0.2 lb/1000 gal wastewater * 2,124,000 gal/yr
= 424.8 lb/yr
*1/360 = 1.18 lb/day (30-day avg)
*1/365 = 1.16 lb/day
*1/24 = 0.048 lb/hr

Change in Emissions : Delta = Post – Pre
= 1.16 – 0.20 lb/day
= 0.96 lb/day increase

## HEALTH RISK ASSESSMENT:

Assume annual ROG emissions increase is 400 lb/yr (conservative). Assume a conservative gasoline TAC profile, the speciated emissions are:

TAC Emissions

| TAC | Wt.% in Vapor | Emissions, lbs/yr | Emissions, lb/hr |
|---|---|---|---|
| Benzene | 2.80 | 11.2 | 0.001279 |
| Ethyl benzene | 0.10 | 0.4 | 0.000046 |
| n-Hexane | 4.13 | 16.52 | 0.00189 |
| Toluene | 1.46 | 5.84 | 0.000667 |
| Xylenes | 0.51 | 2.04 | 0.000233 |
| Naphthalene | 0.0014 | 0.0056 | 6.39E-7 |
| Methanol | 1.60 | 6.4 | 0.000731 |
| Hydrogen fluoride | 1.00 | 4.0 | 0.000457 |
| Hydrogen sulfide | 1.00 | 4.0 | 0.000457 |
| Styrene | 0.16 | 0.64 | 0.000073 |
| Butadiene | 0.11 | 0.44 | 0.0000502 |
| Cresol | 0.0013 | 0.0052 | 5.94E-7 |
| Phenol | 0.0015 | 0.006 | 6.85E-7 |

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

Assume: Volume Source
Residential = 1000 m
Commercial = 100 m
Dimensions: Area =184 ft2 (estimated "footprint" of O-W separator)

The results indicate that the MICR for the residential receptor is 2.94E-08 and for the worker is 3.44E-07. 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.

**RULES EVALUATION:**

401: Visible emissions are not expected
402: Nuisance is not expected

464: This system collects and treats oily waters from tank cleaning, spills, bottom draining, etc. The sump and o-w separator are covered. Compliance.

Reg 13:BACT: Increase of ROG from this modification is less than one pound per day. BACT is not triggered

Modeling: Modeling for ROG is not required.

Offsets: NSR will be updated with corrected emissions based on throughput info in historical application files. New throughput limitation will be placed in conditions. Project emission increase will be offset by ERCs.

1303(b)(4) Facility compliance: There have been 2 NOVs and 1 NC during the last two years. Per 6/5/14 email from C. Aviles of Compliance, facility is currently in compliance.

1303(b)(5)(B) Statewide Compliance: Per KMLT letter, facilities in California are in compliance (see KMLT letter December 15, 2014)

1303(b)(5)(A&D) Compliance Thru CEQA: This project is exempt per the responses on the 400 CEQA form

1401: The risk associated with this throughput increase is less than one in a million and HIA and HIC are less than one.

Reg XX: This is a NOX RECLAIM facility.

Title V: This permit will be issued as a revision (Minor Revision under A/N 558809) to the existing Title V Permit after a 45-day EPA review period.

RECOMMENDATION:
A Permit to Operate is recommended with the attached conditions after a 45 day EPA comment period.

# A/N 561284
## SUMP – SPILL TANK

## HISTORY:

This application was submitted 3/12/14 as a Class I to add a submersible pump to an existing sump/spill tank currently permitted under A/N 334958:P/O F10890 (Device D55).

## PROCESS DESCRIPTION:

Currently, SFPP utilizes vacuum trucks to transfer liquid from the sump/spill tank into the oil-water separator system. The proposed pump will help speed up removal of liquid flowing into the sump/spill tank, especially during the wet season.

## EMISSIONS:

Emissions increase will be due to fugitives from the new pump and components. See Excel Spreadsheet. Fugitives emissions is 0.17.lb/day (62.05 lb/yr).

Previous emissions were determined in another previous application (A/N 314181) as follows:

PreMod ROG(R1=R2) = 25000 gal/yr * 9.8 lb ROG/1000 gal
= 245 lb/yr
= 0.68 lb/day (30-day)
= 0.67 lb/day
= 0.028 lb/hr

where EF = 9.8 lb/1000 gal is from AQMD 94-95 Annual Emissions Reporting for underground tank/gasoline.

PostMod ROG (R1=R2) = 245 lb/yr + 62.0 lb/yr
= 307 lb/yr
*1/360 = 0.85 lb/day (30-day)
*1/365 = 0.84 lb/day
*1/24 = 0.035 lb/hr

Increase = 0.85 – 0.68 = 0.17 lb/day

**HEALTH RISK ASSESSMENT:**

Assume annual ROG emissions increase is 100 lb/yr (conservative). Assuming a conservative gasoline TAC profile, the speciated emissions are:

TAC Emissions

| TAC | Wt.% in Vapor | Emissions, lbs/yr | Emissions, lb/hr |
|---|---|---|---|
| Benzene | 2.80 | 2.8 | 0.00032 |
| Ethyl benzene | 0.10 | 0.1 | 0.000011 |
| n-Hexane | 4.13 | 4.13 | 0.00047 |
| Toluene | 1.46 | 1.46 | 0.000167 |
| Xylenes | 0.51 | 0.51 | 0.000058 |
| Naphthalene | 0.0014 | 0.0014 | 1.6E-7 |
| Methanol | 1.60 | 1.6 | 0.000183 |
| Hydrogen fluoride | 1.00 | 1.0 | 0.000114 |
| Hydrogen sulfide | 1.00 | 1.0 | 0.000114 |
| Styrene | 0.16 | 0.16 | 0.000018 |
| Butadiene | 0.11 | 0.11 | 0.000013 |
| Cresol | 0.0013 | 0.0013 | 1.484E-7 |
| Phenol | 0.0015 | 0.0015 | 1.71E-7 |

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

Assume: Volume Source
Residential = 1000 m
Commercial = 100 m
Dimensions: Area =195 ft2 (estimated "footprint" of sump)

The results indicate that the MICR for the residential receptor is 7.4E-09 and for the worker is 8.65E-08. 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.

**PROJECT EMISSIONS:**

OWS increase = 1.18 – 0.2 = 0.98 lb/day
Sump increase = 0.85 – 0.68 = 0.17 lb/day

INCREASE = 1.15 lb/day
*1.2 = 1.38 lb/day
(One pound ERC needed)

**RULES EVALUATION:**

401: Visible emissions are not expected
402: Nuisance is not expected
464: This equipment is part of a collection and treatment system for oily waters from tank cleaning, spills, bottom draining, etc. The sump and o-w separator are covered. Compliance.

Reg 13:BACT: Increase of ROG from this modification is 0.17 lb/day and is less than one pound per day. NSR will be updated with corrected emissions based on throughput info in historical application files and throughput limitation will be added in conditions. BACT is not triggered.

Modeling: Modeling for ROG is not required.

Offsets: Project emissions will be offset by ERCs

1303(b)(4) Facility compliance: There have been 2 NOVs and 1 NC during the last two years. Per 6/5/14 email from C. Aviles of Compliance, facility is currently in compliance.

1303(b)(5)(B) Statewide Compliance: Per KMLT letter, facilities in California are in compliance (see KMLT letter December 15, 2014)

1303(b)(5)(A&D) Compliance Thru CEQA: This project is exempt per the responses on the 400 CEQA form

1401: The risk associated with this throughput increase is less than one in a million and HIA and HIC are less than one.

Reg XX: This is a NOX RECLAIM facility.

Title V: This permit will be issued as a revision (Minor Revision) to the existing Title V Permit (under A/N 558809) after a 45-day EPA review period.

**RECOMMENDATION:**

A Permit to Construct/Operate is recommended with the attached conditions after a 45 day EPA comment period.