

# South Coast Air Quality Management District

## Statement of Basis

### Proposed Renewal of Title V Permit

*Issue Date: 07/29/2011*

**Facility Name:** ConocoPhillips/Torrance Tank Farm  
**Facility ID:** 111814  
**SIC Code:** 4612  
**Equipment Location:** 2650 Lomita Blvd.  
Torrance, CA 90505

**Application #(s):** 449726  
**Application Submittal Date(s):** 10/18/2005

**Permit Revision #:** 4  
**Revision Date:** TBD  
**Permit Section(s) Affected:** All

**AQMD Contact Person:** Diana Thai, Air Quality Engineer I  
**Phone Number:** (909) 396-3443  
**E-Mail Address:** dthai@aqmd.gov

---

#### 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 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<sub>2</sub>, SO<sub>2</sub>, 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/Torrance Tank Farm located at 2650 Lomita Blvd., Torrance, CA 90505. This facility is subject to Title V requirements because it is a major source and is subject to certain 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. The facility receives petroleum products by pipelines and truck unloading and distributes products by pipelines. Products such as gasoline and crude oil are stored in a series of storage tanks. In addition, this facility operates internal combustion engines and sumps.

## **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 16, 2001 and subsequent revisions were issued on January 2, 2003, August 7, 2003, March 17, 2004, and January 24, 2006.

## **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. 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, H, 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 monitoring and operational requirements can be found in the Engineering Evaluations. 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       | 0.014                 |
| CO        | 0.551                 |
| VOC       | 12.373                |
| PM        | 0.000                 |
| SOx       | 0.000                 |

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

| The Following TACs Were Reported | Emissions (lbs/yr) |
|----------------------------------|--------------------|
| Benzene                          | 110.107            |
| 1,3-Butadiene                    | 0.280              |
| Formaldehyde                     | 0.280              |
| Naphthalene                      | 20.943             |
| Nickel                           | 0.280              |

### **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 0 citizen complaints filed, 0 Notices to Comply issued, and 0 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 R Minor Source (NESHAPs for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities), Subpart BBBBBB (NESHAPs for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities), Rule 1176 (Sumps and Wastewater Separators), Rule 1171 (Solvent Cleaning Operations), and 40 CFR 63 Subpart ZZZZ (NESHAPs for Stationary Reciprocating Internal Combustion Engines). The facility was removed from 40 CFR Part 63 Subpart R Major Source (NESHAPs for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities). The facility submitted calculations demonstrating it does not exceed the Hazardous Air Pollutants (HAPs) thresholds; therefore, it was never supposed to be deemed as a Major Source and subject to those requirements. The proposed renewal permit incorporates these changes in Sections D, H, K, and J. In addition, Rule 466.1 (Valves and Flanges) and Rule 467 (Pressure Relief Devices) have been removed from the table of applicable rules in Section K.