

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Issue Date: February 24, 2015

Facility Name:	Tesoro Logistics Operations, LLC
Facility ID:	174694
SIC Code:	5171
Equipment Location:	14696 S. Wilmington Avenue Carson, CA 90745
Application #:	556856
Application Submittal Date:	7/26/13
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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. In the South Coast Air Basin, CO, NO₂, and SO₂ are in attainment with federal standards, PM-10 is in attainment at the federal level but remains nonattainment at the state level, and PM-2.5, ozone and lead (Los Angeles County) are nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of Tesoro Logistics Operations, LLC, located at 14696 S. Wilmington Avenue, Carson, CA. This facility is subject to Title V requirements because it is a major source of Volatile Organic Compound (VOC) emissions.

2. Facility Description

This is an existing storage terminal (tank farm) that receives, temporarily stores, and distributes petroleum products. Products are received and distributed via pipeline transfer. The facility operates five storage tanks, two sumps, an oil-water separation system, and two internal combustion engines. The two sumps are vented passively to air pollution control systems (activated carbon).

3. Construction and Permitting History

Tesoro Logistics Operations LLC is an active and operating petroleum product storage terminal located in the city of Carson, CA. The facility began its operation in 1977 under the Atlantic Richfield Company (ARCO). The Facility has changed owner ship several times, the most recent being acquired by Tesoro Logistics Operations, LLC, in June, 2013. Though the facility has existed for quite some time and has operated under several owners, very little permitting activity and/or equipment changes have occurred over recent decades and most of the changes that have occurred have entailed updating and correcting minor permit errors and including compliance plans for both Rule 463 and Rule 1470. These changes had little if any impact on the facility's emission profile.

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, Sections D and E 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 apply to this facility and related conditions can be found in Section D and Section J of the Title V permit. No NSPS requirements of 40 CFR Part 60 equipment at the facility.

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, Sections D, H, I, and J, and Appendix B of the proposed Title V permit). Discussion of any other 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 the control equipment at the facility (See CAM Assessment/Applicability in the Engineering Evaluation).

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 2013

Criteria Pollutants (Tons per Year):

Pollutant ID	Pollutant Description	Annual Emissions
CO	Carbon Monoxide	0.194
NOX	Nitrogen Oxides	0.342
ROG	Reactive Organic Gases	9.892
SOX	Sulfur Oxides	0.000
TSP	Total Suspended Particulates	0.014

Toxic Pollutants (Pounds per Year):

Pollutant ID	Pollutant Description	Annual Emissions
106990	1,3-Butadiene	0.174
91576	2-Methyl naphthalene [PAH, POM]	0.005
83329	ACENAPHTHENE	0.000
208968	ACENAPHTHYLENE	0.000
766417	Ammonia	2.290
7440382	Arsenic	0.000
191242	B[GHI] PERYLENE	0.000
71432	Benzene	49.151
205992	Benzo[b]fluoranthene	0.000
192972	Benzo[e]pyrene [PAH, POM]	0.000
7440439	Cadmium	0.000
56235	Carbon tetrachloride	0.006

18540299	Chromium (VI)	0.000
218019	Chrysene	0.000
106934	Ethylene dibromide	0.007
107062	Ethylene dichloride	0.003
206440	FLUORANTHENE	0.000
86737	FLUORENE	0.000
50000	Formaldehyde	9.759
7439921	Lead (inorganic)	0.004
75092	Methylene chloride	0.003
91203	Naphthalene	9.317
7440020	Nickel	0.002
1151	PAHs, total, with components not reported	0.021
85018	PHENANTHRENE	0.001
129000	PYRENE	0.000
75014	Vinyl chloride	0.002

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The review determined that it is exempt from AB 2588 requirements.

8. Compliance History

This facility is subject to both self-reporting requirements and AQMD inspections. In the last two years, the facility has had no citizen complaints filed and no Notices of Violation or Notices to Comply issued.

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

The proposed renewal updates the contact information in Section A, updates regulatory requirements, corrects typographical errors, and adds clarifying information in Section D, updates the Rule 463 Plan in Section I, updates the applicable NESHAPs in Section J, and updates the Rule Table in Section K. Details of these changes can be found in the Engineering Evaluation and the proposed renewed Title V permit.