

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE APPLICATION PROCESSING AND CALCULATIONS	TOTAL PAGES:	PAGE NO.:
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	AA	#/Phillips 66 <i>COT</i>

PERMIT TO OPERATE

APPLICANT	Phillips 66 Pipeline, LLC.
MAILING ADDRESS	13500 S. Broadway Los Angeles, CA 90061
EQUIPMENT LOCATION	Same as above

EQUIPMENT DESCRIPTION:

A/N 540219

AIR POLLUTION CONTROL SYSTEM NO. 1, CONSISTING OF:

1. TWO CARBON ADSORBERS, 25,520 POUNDS EACH, WITH REGENERATION SYSTEM, MCGILL, MODEL MR 1004, SERIAL NO. 70295, 800 CFM CAPACITY, CONSISTING OF:
 - A. ONE COOLING WATER PUMP, CENTRIFUGAL, MECHANICAL SEAL, 3-HP, COMMON TO AIR POLLUTION CONTROL SYSTEM NO. 2.
 - B. TWO VACUUM PUMPS (ONE SPARE), MECHANICAL SEALS, 75-HP EACH.
 - C. SEAL FLUID RECIRCULATION PUMP, 3-HP.
 - D. GASOLINE RETURN PUMP, CENTRIFUGAL, MECHANICAL SEALS, 10-HP.
 - E. GASOLINE (ABSORBENT) SUPPLY PUMP, CENTRIFUGAL, MECHANICAL SEALS 15-HP.
 - F. COMBINED ABSORBER (3' DIA. X 10' H.)/SEPARATOR (4'-6" DIA. X 10'-0" L).
 - G. SEAL FLUID HEAT EXCHANGER, SHELL AND TUBE TYPE.
2. KNOCK-OUT SUMP TANK, 750 GALLONS CAPACITY, ABOVE-GROUND, VENTED TO CARBON ADSORBERS, COMMON TO AIR POLLUTION CONTROL SYSTEM NO. 2.
3. KNOCK-OUT GASOLINE PUMP, CENTRIFUGAL, MECHANICAL SEALS, 1.5-HP, COMMON TO AIR POLLUTION CONTROL SYSTEM NO. 2.

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4. EXHAUST SYSTEM CONSISTING OF TWELVE VAPOR PICK-UP LINES AND A COLLECTION HEADER, COMMON TO AIR POLLUTION CONTROL SYSTEM NO. 2 SERVING LOADING RACKS 1, 2, 3, 4, 5, & 6.

Conditions:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]

2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]

3. THE MAXIMUM GASOLINE LOADING RATE AT THIS FACILITY SHALL NOT EXCEED 108,450,000 GALLONS IN ANY ONE CALENDAR MONTH.

THE OPERATOR SHALL MAINTAIN RECORDS IN A MANNER APPROVED BY THE AQMD, TO DEMONSTRATE COMPLIANCE WITH THIS CONDITION.
[RULE 1303(b)(2)-OFFSETS]

4. THE OPERATOR SHALL LIMIT THE THROUGHPUT TO NO MORE THAN 4,613,269 GALLONS PER DAY. TO COMPLY WITH THIS CONDITION, THE OPERATOR SHALL INSTALL AND MAINTAIN A TOTALIZING FLOW METER TO ACCURATELY INDICATE THE THROUGHPUT OF THE LOADING RACK.

THE OPERATOR SHALL MAINTAIN RECORDS IN A MANNER APPROVED BY THE AQMD, TO DEMONSTRATE COMPLIANCE WITH THIS CONDITION.

THE OPERATOR SHALL COMPLY WITH THIS THROUGHPUT LIMIT TO COMPLY WITH RULE 462(d)(1)(A), WHICH IS THE CURRENT CALIFORNIA AIR RESOURCES BOARDS CERTIFICATION (CARB) LIMIT. THIS LIMIT MAY BE MODIFIED AT A LATER DATE BASED ON A NEW CARB OR AQMD CERTIFICATION.
[RULE 462, RULE 1303(a)(1)-BACT]

5. DURING ANY NORMAL LOADING OPERATION, THE AIR POLLUTION CONTROL SYSTEMS 1 AND 2 SHALL BE IN FULL OPERATION AT ALL TIMES.

WHEN ONLY ONE AIR POLLUTION CONTROL SYSTEM IS IN OPERATION FOR ANY LENGTH OF TIME, THE LOADING SHALL BE LIMITED TO FOUR LOADING LANES ONLY. THE LOADING RATE SHALL NOT EXCEED THE DAILY LIMIT CALCULATED AS FOLLOWS:

$$\frac{[(4,613,269 \times \text{NO. OF HOURS BOTH AIR POLLUTION CONTROL SYSTEMS WERE IN OPERATION}) + (2,180,000 \times \text{NO. OF HOURS ONLY ONE AIR POLLUTION CONTROL SYSTEM WAS IN OPERATION})]}{24}$$

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WHERE 2,180,000 GALLONS PER DAY IS THE DAILY LIMIT WHEN ONLY ONE AIR POLLUTION CONTROL SYSTEM IS IN OPERATION.

DAILY RECORDS WHEN ONE AIR POLLUTION CONTROL SYSTEM AND BOTH AIR POLLUTION CONTROL SYSTEMS WERE IN OPERATION SHALL BE MAINTAINED AND SHALL BE MADE AVAILABLE TO THE EXECUTIVE OFFICER OR HIS AUTHORIZED REPRESENTATIVE UPON REQUEST.

[RULE 1303(B)(2)-OFFSETS]

6. THE CONTINUOUS HYDROCARBON MONITORING SYSTEM SHALL BE IN FULL USE AT ALL TIMES AND SHALL ALERT THE OPERATOR BOTH AUDIBLY AND VISUALLY TO STOP VENTING TO THE AIR POLLUTION CONTROL SYSTEM WHEN THE HYDROCARBON CONCENTRATION IN THE AIR POLLUTION CONTROL EXHAUST IS IN EXCESS OF PERMITTED LIMIT(S).
[RULE 462]
7. DAILY AND MONTHLY THROUGHPUT RECORDS, CEMS DATA INCLUDING, BUT NOT LIMITED TO, THE STRIP CHART, CALIBRATION LOG, TROUBLESHOOTING LOG, ETC., SHALL BE MAINTAINED AND MADE AVAILABLE UPON THE REQUEST OF AQMD PERSONNEL.
[RULE 462]
8. THE OPERATOR SHALL CONDUCT SOURCE TEST(S) TO DETERMINE THE TOTAL VOC EMISSION RATE IN POUNDS VOC PER 1000 GALLONS GASOLINE LOADED UNDER ROUTINE LOADING CONDITIONS. THE TOTAL QUANTITY OF GASOLINE LOADED AT EACH RACK DURING THE TEST SHALL BE MEASURED AND RECORDED. THE TEST(S) SHALL BE CONDUCTED AT LEAST ONCE EVERY 60 CALENDAR MONTHS.
[RULE 462, RULE 3004(A)(4) PERIODIC MONITORING]
9. A SOURCE TEST CONDUCTED BY CARB CAN BE SUBSTITUTED FOR COMPLIANCE DETERMINATION.
[RULE 204, RULE 462]
10. THE FACILITY SHALL INSTALL AND MAINTAIN A CONTINUOUS EMISSION MONITORING SYSTEM (CEMS) IN COMPLIANCE WITH AN AQMD APPROVED RULE 462 COMPLIANCE PLAN.
[RULE 462]

PERIODIC MONITORING:

11. THE AIR POLLUTION CONTROL SYSTEM SHALL BE MONITORED FOR LEAKS ACCORDING TO RULE 1173.
[RULE 463, RULE 3004 (A)(4) - PERIODIC MONITORING]
12. THE OPERATOR SHALL CONDUCT SOURCE TEST(S) FOR VOC EMISSIONS. THE TEST(S) SHALL BE CONDUCTED SIMULTANEOUSLY AT THE INLET AND OUTLET OF THE AIR

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POLLUTION CONTROL EQUIPMENT. THE TEST(S) SHALL BE CONDUCTED AT LEAST ONCE EVERY 60 CALENDAR MONTHS.
[RULE 463, RULE 1303(a)(1) BACT, 3004(a)(4) PERIODIC MONITORING]

EMISSIONS AND REQUIREMENTS:

13. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

- VOC: 0.08 LBS/1000 GALLONS ORGANIC LIQUID LOADED, RULE 462
- VOC: 35 MG/LITER GASOLINE LOADED, 40CFR60 SUBPART XX
- VOC: 95% CONTROL EFFICIENCY, RULE 463

A/N 540221

AIR POLLUTION CONTROL SYSTEM NO. 2, CONSISTING OF:

1. TWO CARBON ADSORBERS, 25,520 POUNDS EACH, WITH REGENERATION SYSTEM, MCGILL, MODEL MR 1004, SERIAL NO. 210106, 800 CFM CAPACITY, CONSISTING OF:
 - A. ONE COOLING WATER PUMP, CENTRIFUGAL, MECHANICAL SEAL, 3-HP, COMMON TO AIR POLLUTION CONTROL SYSTEM NO. 1.
 - B. TWO VACUUM PUMPS (ONE SPARE), MECHANICAL SEALS, 75-HP EACH.
 - C. SEAL FLUID RECIRCULATION PUMP, 3-HP.
 - D. GASOLINE RETURN PUMP, CENTRIFUGAL, MECHANICAL SEALS, 10-HP.
 - E. GASOLINE (ABSORBENT) SUPPLY PUMP, CENTRIFUGAL, MECHANICAL SEALS 15-HP.
 - F. COMBINED ABSORBER (3' DIA. X 10' H.)/SEPARATOR (4'-6" DIA. X 10'-0" L).
 - G. SEAL FLUID HEAT EXCHANGER, SHELL AND TUBE TYPE.
2. KNOCK-OUT SUMP TANK, 750 GALLONS CAPACITY, ABOVE-GROUND, VENTED TO CARBON ADSORBERS, COMMON TO AIR POLLUTION CONTROL SYSTEM NO. 1.
3. KNOCK-OUT GASOLINE PUMP, CENTRIFUGAL, MECHANICAL SEALS, 1.5-HP, COMMON TO AIR POLLUTION CONTROL SYSTEM NO. 1.
4. EXHAUST SYSTEM CONSISTING OF TWELVE VAPOR PICK-UP LINES AND A COLLECTION HEADER, COMMON TO AIR POLLUTION CONTROL SYSTEM NO. 1 SERVING LOADING RACKS 1, 2, 3, 4, 5, & 6.

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Conditions:

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[RULE 204]

2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]

3. THE MAXIMUM GASOLINE LOADING RATE AT THIS FACILITY SHALL NOT EXCEED 108,450,000 GALLONS IN ANY ONE CALENDAR MONTH.

THE OPERATOR SHALL MAINTAIN RECORDS IN A MANNER APPROVED BY THE AQMD, TO DEMONSTRATE COMPLIANCE WITH THIS CONDITION.
[RULE 1303(b)(2)-OFFSETS]

4. THE OPERATOR SHALL LIMIT THE THROUGHPUT TO NO MORE THAN 4,613,269 GALLONS PER DAY. TO COMPLY WITH THIS CONDITION, THE OPERATOR SHALL INSTALL AND MAINTAIN A TOTALIZING FLOW METER TO ACCURATELY INDICATE THE THROUGHPUT OF THE LOADING RACK.

THE OPERATOR SHALL MAINTAIN RECORDS IN A MANNER APPROVED BY THE AQMD, TO DEMONSTRATE COMPLIANCE WITH THIS CONDITION.

THE OPERATOR SHALL COMPLY WITH THIS THROUGHPUT LIMIT TO COMPLY WITH RULE 462(d)(1)(A), WHICH IS THE CURRENT CALIFORNIA AIR RESOURCES BOARDS CERTIFICATION (CARB) LIMIT. THIS LIMIT MAY BE MODIFIED AT A LATER DATE BASED ON A NEW CARB OR AQMD CERTIFICATION.
[RULE 462, RULE 1303(a)(1)-BACT]

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$$\frac{[(4,613,269 \times \text{NO. OF HOURS BOTH AIR POLLUTION CONTROL SYSTEMS WERE IN OPERATION}) + (2,180,000 \times \text{NO. OF HOURS ONLY ONE AIR POLLUTION CONTROL SYSTEM WAS IN OPERATION})]}{24}$$

WHERE 2,180,000 GALLONS PER DAY IS THE DAILY LIMIT WHEN ONLY ONE AIR POLLUTION CONTROL SYSTEM IS IN OPERATION.

DAILY RECORDS WHEN ONE AIR POLLUTION CONTROL SYSTEM AND BOTH AIR POLLUTION

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CONTROL SYSTEMS WERE IN OPERATION SHALL BE MAINTAINED AND SHALL BE MADE AVAILABLE TO THE EXECUTIVE OFFICER OR HIS AUTHORIZED REPRESENTATIVE UPON REQUEST.

[RULE 1303(B)(2)-OFFSETS]

6. THE CONTINUOUS HYDROCARBON MONITORING SYSTEM SHALL BE IN FULL USE AT ALL TIMES AND SHALL ALERT THE OPERATOR BOTH AUDIBLY AND VISUALLY TO STOP VENTING TO THE AIR POLLUTION CONTROL SYSTEM WHEN THE HYDROCARBON CONCENTRATION IN THE AIR POLLUTION CONTROL EXHAUST IS IN EXCESS OF PERMITTED LIMIT(S).
[RULE 462]
7. DAILY AND MONTHLY THROUGHPUT RECORDS, CEMS DATA INCLUDING, BUT NOT LIMITED TO, THE STRIP CHART, CALIBRATION LOG, TROUBLESHOOTING LOG, ETC., SHALL BE MAINTAINED AND MADE AVAILABLE UPON THE REQUEST OF AQMD PERSONNEL.
[RULE 462]
8. THE OPERATOR SHALL CONDUCT SOURCE TEST(S) TO DETERMINE THE TOTAL VOC EMISSION RATE IN POUNDS VOC PER 1000 GALLONS GASOLINE LOADED UNDER ROUTINE LOADING CONDITIONS. THE TOTAL QUANTITY OF GASOLINE LOADED AT EACH RACK DURING THE TEST SHALL BE MEASURED AND RECORDED. THE TEST(S) SHALL BE CONDUCTED AT LEAST ONCE EVERY 60 CALENDAR MONTHS.
[RULE 462, RULE 3004(A)(4) PERIODIC MONITORING]
9. A SOURCE TEST CONDUCTED BY CARB CAN BE SUBSTITUTED FOR COMPLIANCE DETERMINATION.
[RULE 204, RULE 462]
10. THE FACILITY SHALL INSTALL AND MAINTAIN A CONTINUOUS EMISSION MONITORING SYSTEM (CEMS) IN COMPLIANCE WITH AN AQMD APPROVED RULE 462 COMPLIANCE PLAN.
[RULE 462]

PERIODIC MONITORING:

11. THE AIR POLLUTION CONTROL SYSTEM SHALL BE MONITORED FOR LEAKS ACCORDING TO RULE 1173.
[RULE 463, RULE 3004 (A)(4) - PERIODIC MONITORING]
12. THE OPERATOR SHALL CONDUCT SOURCE TEST(S) FOR VOC EMISSIONS. THE TEST(S) SHALL BE CONDUCTED SIMULTANEOUSLY AT THE INLET AND OUTLET OF THE AIR POLLUTION CONTROL EQUIPMENT. THE TEST(S) SHALL BE CONDUCTED AT LEAST ONCE EVERY 60 CALENDAR MONTHS.
[RULE 463, RULE 1303(a)(1) BACT, 3004(a)(4) PERIODIC MONITORING]

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EMISSIONS AND REQUIREMENTS:

13. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

- VOC: 0.08 LBS/1000 GALLONS ORGANIC LIQUID LOADED, RULE 462
- VOC: 35 MG/LITER GASOLINE LOADED, 40CFR60 SUBPART XX
- VOC: 95% CONTROL EFFICIENCY, RULE 463

BACKGROUND

Phillips 66 operates a Class A organic liquid bulk loading facility at the Los Angeles Terminal-East (Facility ID No. 171326). Only recently did the ownership change from ConocoPhillips (ID 800365). The facility stores gasoline and distillate products in storage tanks and loads the products from six loading bays onto truck transports for delivery to service gas stations. As the product is loaded onto the transports the displaced vapor is transported to two Vapor Recovery Units and absorbed back into liquid product. Emissions from the VRUs are continuously monitored by a CMS, and the unit will alarm both audibly and visually if the 15 minute rolling average concentration of non-methane hydrocarbons (NMHC) equals the 0.08 lb/1000 gallon loaded standard (determined to be 0.864% NMHC from source test data – 7/2005 correspondence to Danny Luong), or is above the analyzer range (1.9% NMHC on an instantaneous basis). The permit requires that when the CMS alarm is triggered, loading will be stopped and vapors will be diverted to the non-alarming unit. Vapors will not be directed to the alarming VRU, until regeneration has returned the emissions to below the alarm set points.

On June 26, 2012, the AQMD received two applications from Phillips to change the testing frequency for the VRUs from annually, to once every 5 years. The applicant requested the reduction of testing frequency because the VRU is monitored with a CEMS and a CMS alarm/shut down procedure provides a greater level of protection to air quality than that of annual source testing. VOC source testing is required once every five (5) years to determine if carbon

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degradation has taken place. Therefore, the applicant is requesting a reduction in the source test frequency to once per permit cycle (1/ 5 years).

HISTORY

The Permits to Construct for the vapor recovery units were issued on November 12, 1999. Conditions were imposed included an annual source testing of the units for VOC, benzene, toluene, ethylbenzene and n-hexane to determine the concentration, mass rate, and control efficiency of these compounds. As of December, 2011, the annual tests show that the units are well within compliance of the emission standard. Results for the last 5 years are shown below.

Test	Report	VRU 1 Emission Factor	VRU 2 Emission Factor
<u>Date</u>	<u>Date</u>	<u>TNMHC (lbs/1000 gals)</u>	<u>TNMHC (lbs/1000 gals)</u>
1/24/2006	3/1/2006	0.0001	0.00020
6/25/2007	8/20/2007	0.0002	0.00060
5/21/2008	7/21/2008	0.001	0.0002
6/2/2009	7/14/2009	0.00006	0.00006
12/1/2010	1/24/2011	0.0002	0.00008
12/15/2011	2/1/2012	0.0001	0.015
AVE.		0.00028	0.00269
Reg. Standard		0.08	0.08

All tests conducted according to SCAQMD Procedure 501.1

Table 1 lists the applications submitted along with the equipment description and proposed change in condition. Table 2 lists permit processing fees and equipment information. Attachment B includes a copy of the existing permits for the two vapor recovery systems.

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Table 1: LIST OF APPLICATIONS SUBMITTED FOR SOURCE TEST FREQUENCY REDCUTION

<i>A/N</i>	<i>Application Type</i>	<i>Equipment</i>	<i>Existing A/N</i>	<i>Proposed Change</i>
540219	Change of Condition	Vapor recovery unit	536749	To modify the source test frequency from annually, to once every five years, and adopt continuous VOC monitoring
540221	Change of Condition	Vapor recovery unit	536751	
546860	Change of Condition	Title V Permit		

The AQMD Compliance Database did not show any Notice of Violation or any public nuisance complaint against the subject pieces of equipment in the past two years (01/01/09-07/01/011).

PROCESS DESCRIPTION

ConocoPhillips operates a petroleum products distribution terminal on South Broadway in Los Angeles. At the terminal's truck loading rack, displaced gasoline vapors from the loading operation are collected and routed to a single vapor recovery line. The vapor recovery line then tees and each branch of the tee are routed to one of the two dual type carbon adsorption vapor processing units. Under normal conditions, both of the carbon adsorption units are operating continuously. Each carbon adsorption unit consists of two carbon beds. As vapors pass through one carbon bed, the other carbon bed is being regenerated. As the vapors pass through the carbon bed, hydrocarbons in the air stream are adsorbed by the carbon and the exhaust is vented to atmosphere. Each carbon bed is regenerated every fifteen minutes. This procedure happens simultaneously on both carbon adsorption units and both units run continuously. There is a pair of block valves that are used in combination with a pressure differential gauge to adjust vapor flow equally to each VRU.

Loading Racks

There are six loading racks designed for truck bottom filling. There are eight (8) gasoline pumps serving sixteen loading arms programmed to deliver 600 gpm maximum. Hydrocarbon vapors displaced from the truck loading racks are recovered and processed by a pair of two McGill MR 1004, carbon adsorption/gasoline absorption Vapor Recovery Units (VRU) in parallel operation as described below.

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Vapor Recovery Units

Both units, VRU 1 and VRU 2, consist of two carbon vessels and associated pumps and controls connected to the gasoline loading racks. Under normal loading operations, both units operate simultaneously to process the hydrocarbon vapors. Should one unit go down, loading rates are lowered to allow the remaining unit to keep up with the hydrocarbon demand.

During the operation of the units, hydrocarbon and air vapors collected from the rack flow through a common pipe to condensate knockout tank where liquids drop out and the vapors continue on to a tee in the pipe, where the vapors are separated to VRU 1 and VRU 2. The carbon beds adsorb the hydrocarbons in the vapor stream, and the remaining air is vented to the atmosphere. While one carbon bed from each unit is processing the hydrocarbon vapors, the other two carbon beds are off-line being vacuum regenerated (i.e., cleaned). The purpose of regeneration is to restore the carbon to a level where it will effectively adsorb hydrocarbons again. The carbon beds in each unit alternate between adsorption and regeneration at 15-minute interval and further discussed below.

Adsorption

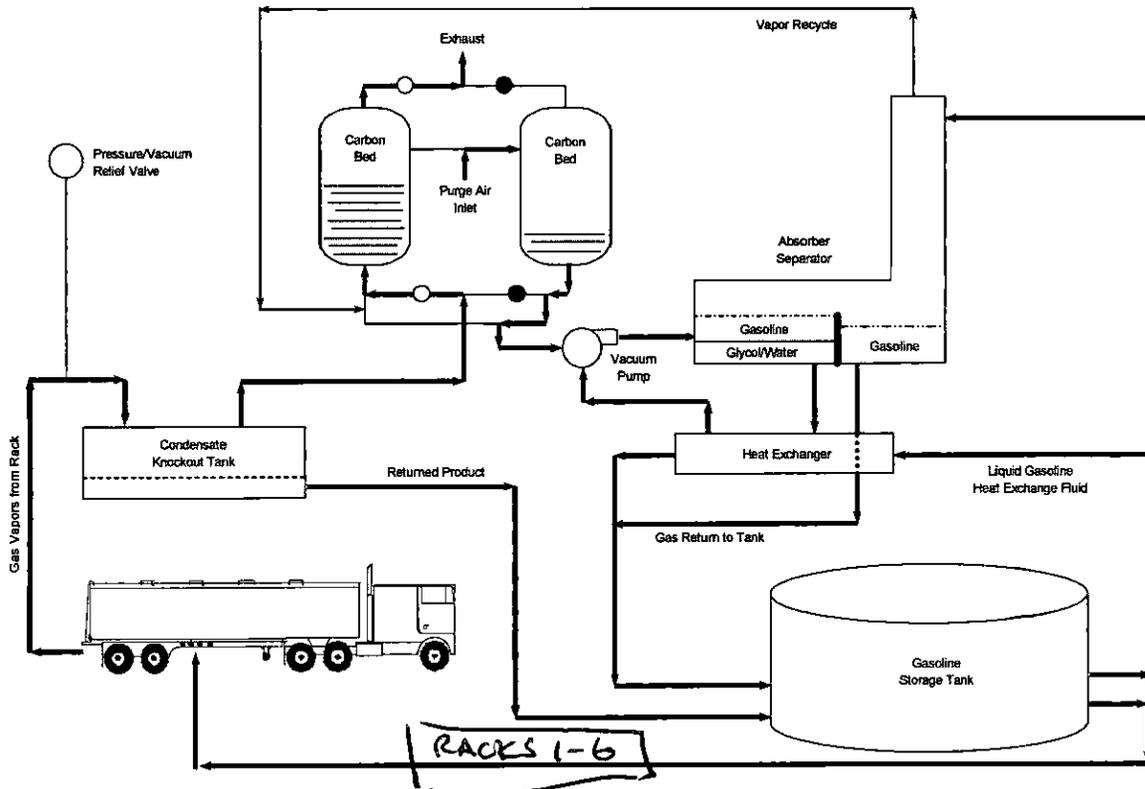
Two carbon beds, 12 foot diameter and 10 foot 8 inch high, 25,520 lbs of carbon each, one on stream receiving vapors from the loading operation and the second being regenerated, are sized with the primary purpose of separating the hydrocarbon from the inlet vapors. The vapors are a mixture of hydrocarbons and air, which are displaced from the loading operation. Through the carbon bed, VOCs are adsorbed and the air is vented to the atmosphere. The amount of activated carbon required for any given set of operating conditions is determined by the vapor flow from the loading rack and the hydrocarbon concentration of the vapor stream during a specified time cycle, usually a 15-minute cycle. Carbon lifetime is 10 to 15 years.

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ENGINEERING AND COMPLIANCE

APPLICATION PROCESSING AND CALCULATIONS

VAPOR RECOVERY UNIT SCHEMATIC



To monitor the VOCs venting to the atmosphere, the VRU is equipped with a continuous monitoring system consisting of a sampling pump, a sampling system, a non-dispersive infrared analyzer, a PLC, and data logger. The PLC calculates the rolling 15 minute average of emissions based on this signal received from the analyzer. An audible alarm is set to activate at the % NMHC equivalent (0.864 % as propane) of the HC emission rate of 0.08 lb/1000 gallons loaded on a rolling 15-minute average. Under Rule 462(e)(1)(B), the facility is required to submit to the District a CMS Plan for approval. Each carbon adsorption unit is equipped with other fail safes that cause the unit to go into alarm mode if problems arise. There are temperature sensors at various levels in the carbon beds to indicate if there is rise in temperature in case of carbon degradation or bad regeneration. A high temperature alarm will close the carbon bed inlet valves and pull vacuum on each bed to cool the beds. Lights and audible alarms also sound in the control room which is staffed with operators 24 hours a day. If the severity of the alarm causes the carbon adsorption unit to automatically shut down, trucks will not be allowed to load until the problem is resolved and the alarm is re-set.

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RULES EVALUATION

Rule 212 Standards for Approving and Issuing Public Notice

There is no increase in emissions or MICR, and there is no school within 1000 feet; no public notice is required.

Rule 401 Visible Emissions - No visible emissions expected.

Rule 402 Nuisance – No nuisance is expected.

Rule 462 Organic Liquid Loading

This facility has demonstrated its 'performance reliability' by continually meeting the 0.08 lb/1000 gallons of organic liquid transferred and the 95% control efficiency as demonstrated by the yearly source test results previously listed.

Rule 463 - Two Fixed Roof storage tanks are vented to APC 1 and 2.

Reg XI Source Specific Standards

Rule 1173: Fugitive Emissions of Volatile Organic Compound

Fugitive components of bulk storage and loading/unloading facilities are subject to fugitive emission monitoring. A facility-wide condition in Section D and as listed in Section K of the facility's Title V permit is expected to assure continued compliance.

Reg XIII New Source Review (NSR)

There are no emission increases for any criteria pollutants as a result of this proposed change of condition, no BACT, Offsets, or Modeling is required.

Reg XIV Toxics and Other Non-Criteria Pollutants

02/07/03

Rule 1401: New Source Review of Toxic Air Contaminants

There are no increases in toxic emissions as a result of this change of condition, thus no increase in MICR or HI.

Reg XXX Title V Permits

The change in condition is considered a minor permit revision (TV Revision A/N 546860) because a VOC CEMS monitoring requirement is considered to be more stringent than an annual VOC source testing requirement. VOC source testing will still be required once every 5 years, to comply with periodic monitoring requirements. In addition the burner change out under application 546861 will also be proposed to EPA for 45-day review prior to being incorporated into Section D of the Title V Permit.

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40 CFR 60 Subpart XX: Standards of Performance for Bulk Gasoline Terminals

Subpart XX applies to bulk loading terminals that load or receive more than 19,997.66 gallons per day of gasoline. Phillip 66 is classified by the District as a Class A facility, since it loads more than 20,000 gallons per day of organic liquids. Therefore, this Subpart applies.

The emissions limit at loading terminals is 35 milligrams per liter (0.29 lb per 1000 gallon) of gasoline loaded. This limit is less stringent than the District's Rule 462 that requires an emission limit of 0.08lb/1000 gallon of gasoline loaded. Compliance is expected.

40 CFR 63 Subpart R: National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)

The Phillips 66 LA Terminal-East is not a major source of HAPs thus is only subject to the minor source requirements (recordkeeping) of this subpart as stated in the facility-wide condition in Section D with supporting conditions in Section J of Title V permit. Continued compliance is expected.

40 CFR 63 Subpart BBBBBB: (Gasoline Terminals and Pipeline Breakout Stations)

As a minor source under Subpart R, this facility is required to comply with this Subpart as required by a facility-wide condition in Section D with supporting conditions in Section J of the title V permit. Continued compliance is expected.

CONCLUSION AND RECOMMENDATION

Issue a P/C-P/O in section D of the Title V permit for a change of permit condition to each of the VRUs and submit to EPA for 45-day review as a minor revision.