

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION PERMIT APPLICATION EVALUATION AND CALCULATIONS	PAGES 3	PAGE 1
	APPL NO 549904 & 08	DATE 7-8-13
	PROCESSED BY LLD	CHECKED BY <i>[Signature]</i>

OWNER/OPERATOR:

COID: 800056

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APPLICATIONS IN THIS BATCH

A/N 549904: RULE 1166 EXCAVATION PLAN

A/N 549908: TV REVISION (DE MINIMUS SIGNIFICANT)

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A/N 549904: RULE 1166 EXCAVATION PLAN

INTRODUCTION:

This application was submitted 4/18/13 for a Rule 1166 Excavation Plan to handle contaminated soil encountered during tank demolition/removal other activities at this facility.

The Port of Los Angeles sent Kinder Morgan Storage Terminals a "Notice of Non-Renewal and Site Characterization Study" dated March 4, 2009 to inform Kinder Morgan that their permit will not be renewed and will expire April 13, 2013. Additionally, Kinder Morgan must commence preparation of a final site characterization study five years prior to expiration of permit.

Kinder Morgan will be demolishing equipment and cleaning the site in accordance with their permit from the Port of Los Angeles. During the demolition, there is potential to encounter contaminated soil. This plan will specify the handling methods and mitigation measures to be followed during excavation of contaminated soil.

PROJECT DESCRIPTION:

The Los Angeles Harbor Terminal is a 10-acre tank farm consisting of 18 above ground petroleum storage tanks, associated pipeline, piping and equipment, truck loading racks and 2 shipping docks. The 18 tanks are segregated into two main areas, each surrounded by spill containment walls. There are no underground pumps or tanks at the site.

The site is located on a man-made, filled portion of the Wilmington lagoon. It was constructed in 1910 from dredging spoils from the Main Channel and fill road materials from road construction in San Pedro. Based on a review of the current map, the site is bordered by the Los Angeles Harbor to the east and south and by an intermodal shipping container terminal to the west and north. There are no residences or sensitive receptors within 1000 feet of the site.

There is one NOV (P34682) issued for an August 22, 2012 violation for visible emissions from thermal oxidizer and VOC emissions >100,000 ppm from avgas filters.

There is no SVE or groundwater extraction/treatment system on site. There was a product recovery system which collected groundwater and recovered product and directed them to a slop tank. That system has been shut down about 4-5 years.

An estimated 60,000-70,000 tons of material was originally expected to be excavated, but per office meeting with Bob Onufer, the amount has been determined to be 210,000 tons. Assuming

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the density of the soil is 2100 lb/loose cubic yards (see Soil Conversion Factors – MSW Management July/August 1998), the amount of material converted in cubic yards is:

$$(210,000 \text{ tons}) \times (2000 \text{ lb/ton}) \times (\text{ccy}/2100 \text{ lb}) = 200,000 \text{ cubic yards}$$

EVALUATION:

Rules:

- 401: Visible emissions are not expected.
- 402: Nuisance is not expected with proper operational procedures and mitigation measures.
- 403: Fugitive emissions are not expected with water spraying.
- 1166: Contaminated soil will be handled per R1166 requirements.
- CEQA: Port of Los Angeles has determined that this project is exempt from CEQA (Report to Applicant dated 6/26/13)
- TV: This is a De Minimus Significant Revision to the facility's TV permit and will require EPA review.

CONCLUSION:

This project will meet all District Rules and Regulations. It is recommended that Plan Approval be granted subject to the attached conditions after completion of the EPA review period.