

TECHNICAL SUPPORT DOCUMENT

TECHNICAL INFORMATION PRESENTED IN REVIEW OF AN
APPLICATION FOR A PART 70 OPERATING PERMIT

SUBMITTED BY

KINDER MORGAN ENERGY PARTNERS, LP

for

CALNEV PIPE LINE, LLC

**Part 70 Operating Permit Number: 13
(Renewal)**

SIC Code - 4226: Petroleum and Chemical Bulk Stations and Terminals for Hire



Clark County
Department of Air Quality and Environmental Management
Permitting Section

DECEMBER 2010

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PROPOSED

I. ACRONYMS

Table I-1: Acronyms

Acronym	Term
AQIA	Air Quality Impacts Analysis
AQR	Clark County Air Quality Regulations
AST	Above Ground Storage Tank
ATC	Authority to Construct
ATC/OP	Authority to Construct/Operating Permit
BACT	Best Available Control Technology
CAAA	Clean Air Act, as amended, or Clean Air Act Amendments
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emissions Monitoring System
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
DAQEM	Clark County Department of Air Quality & Environmental Management
EPA	United States Environmental Protection Agency
EU	Emission Unit
FR	Fixed Roof
HAP	Hazardous Air Pollutant
HP	Horse Power
kW	kilowatt
LAER	Lowest Achievable Emissions Rate
MACT	Maximum Achievable Control Technology
M/N	Model Number
NAICS	North American Industry Classification System
NO _x	Nitrogen Oxides
NRS	Nevada Revised Statutes
NSR	New Source Review
PM ₁₀	Particulate Matter less than 10 microns
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
QA	Quality Assurance
QA/AC	Quality Assurance/Quality Control
RATA	Relative Accuracy Test Audits
SCC	Source Classification Codes
SIC	Standard Industrial Classification
SIP	State Implementation Plan
S/N	Serial Number
SO _x	Sulfur Oxides
UST	Underground Storage Tank
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

II. EXECUTIVE SUMMARY

The Calnev Pipeline LLC (Calnev) Las Vegas site is a bulk fuel transfer facility that began operations in 1961 and is located in the Las Vegas Valley Hydrographic Area 212. They are a major source of VOC emission and a minor source for all other criteria pollutants. The Calnev facility emits particulate matter (PM₁₀), carbon monoxide (CO), nitrogen oxides (NO_x), sulfur oxides (SO_x), volatile organic compounds (VOC) and hazardous air pollutants (HAP) as a result of the storage of petroleum fuels, combustion of propane and diesel, haul road traffic and from a large soil and groundwater remediation project.

Fuels are delivered to the site by two underground pipelines originating in southern California. Incoming fuels are diverted to storage tanks. From these storage vessels fuels are piped to other terminals (e.g. Rebel, Nellis AFB) or to delivery trucks. As the trucks are fueled, specialized additives are injected according to customer's specifications. These fuel additives arrive at the facility via truck or rail.

A general description of all existing processes in the facility is included in Section III-B of this TSD. Table II-1 incorporates the NEI's from the ATC/OP modifications 12 through 21 issued since the March 30, 2004, Title V permit and shows the facility total potential to emit (PTE) for this Part 70 Title V permit renewal.

Table II-1: PTE of the Source by Pollutant

Air Pollutant	PTE (tons per year)
Particulate matter $\leq 10\mu\text{m}$ (PM ₁₀)	8.35
Oxides of Nitrogen (NO _x)	2.52
Carbon Monoxide (CO)	2.85
Oxides of Sulfur (SO _x)	0.16
Volatile Organic Compounds (VOC)	182.46
Hazardous Air Pollutants (HAP)	10.32

The facility was subject to the Lowest Achievable Emission Rate (LAER) for all VOC emissions and was subject to the Best Available Control Technology (BACT) for all other pollutants. The facility has been determined to have met the requirements for LAER and BACT for the criteria pollutants.

This Technical Support Document (TSD) accompanies the Part 70 Operating Permit (OP) prepared by DAQEM for Calnev and incorporates the ATC/OP modifications 12 through 21 issued to Kinder Morgan-Calnev since the last Title V permit revision was issued February 9, 2005.

Based on information submitted by the applicant and a technical review performed by DAQEM staff, DAQEM proposes the issuance of this Part 70 Operating Permit to Calnev.

III. SOURCE INFORMATION

A. General

Permittee	Kinder Morgan Energy Partners, LP
Mailing Address	1100 Town and Country Road Orange, CA 92868
Responsible Official	Phillip Vasquez
Telephone Numbers	Source: 702-643-9130; FAX: 702-644-2236 Company: 714-560-4905; FAX: 714-560-6589
Source Location	5049 Sloan Lane Las Vegas, NV 89115
Hydrographic Area	Las Vegas Valley 212
Township, Range, Section	T19S, R62E, Section 34
SIC Code	4226 – Petroleum and Chemical Bulk Stations and Terminals for Hire
NAICS Code	493190 – Petroleum Bulk Stations and Terminals

B. Description of Process

Calnev is a bulk fuel transfer facility. The various fuels are transported by pipelines from California to the Kinder Morgan facility storage tanks. The fuel passes through thousands of pipes, fittings, pumps and metering devices into large storage tanks.

The transfer of the fuels to tanker trucks is conducted on-site via the loading racks and is then transported off-site.

Approximately one-half of the source's VOC emissions are from the petroleum fuel storage tanks and one-half from the dispensing of fuels to tanker trucks. The large soil and groundwater remediation project being conducted at the facility accounts for a significant source of VOC, as well as breathing losses from the thousands of pipes and fittings. Significant emissions of pollutants are also produced by the combustion of diesel fuel and propane.

C. Permitting History

Calnev is regulated by the Clark County Department of Air Quality and Environmental Management (DAQEM). The facility is a major source of VOC emissions. The source

was issued an initial Part 70 Title V permit on March 30, 2004 and a Revision on February 9, 2005.

Calnev submitted an application for the Title V permit renewal on September 28, 2007.

Table III-C-1: Calnev Permitting History

Type	Issuer	Date Issued/Submitted	Description
Title V Revision	DAQEM	Issued 2/9/2005	Title V Revision Issued
ATC Mod 12	DAQEM	Issued 10/25/2006	1. Increased throughput to EU: A58, A59 and A60. 2. Requested an Administrative change to Mod 6, 3. Added an exempt EU to Mod 12, 4. Requested Administrative change to EU: A14 tank type.
Letter	Kinder Morgan	Issued 3/27/2006	Supplemental information submitted by Kinder Morgan for Mod 12
Application for ATC/OP Mod 13	n/a	Submitted 7/31/2006	Application submitted
Application for ATC/OP Mod 14	n/a	Submitted 8/11/2006	Application submitted
Application for ATC/OP Mod 15	n/a	Submitted 9/26/2006	Application submitted
ATC Mod 16	DAQEM	Issued 3/5/2007	Combined Modifications 13, 14 and 15: 1.) Increased the throughput for EU: A19 and A12, 2.) Updated the EF for EU: B06 and the PTE, 3.) Changed the tank type of EU: A11, 4.) Changed the type of fuel stored in EU: A28 and A61, 5.) Rebuilt the loading lane #10.
Title V Renewal	Kinder Morgan	Submitted 9/28/2007	Title V Renewal Application: 1.) Requested an increased to throughput for EU: A08, A10 and A47, 2.) Increase facility throughput from 55,336,450 bbls/yr to 92,671,688 bbls/yr
ATC Mod 18	DAQEM	Issued/Cancelled 4/9/2008	Combined Modifications 17 and 18: 1.) Changed fuel type to be stored on EU: A08, A10, A47, 2.) Added two new emission units (Provers), 3.) Increased throughput to EU: B01 and B10.
ATC Mod 18 Revision 1	DAQEM	Issued 4/10/2008	
ATC Mod 18 Revision 2	Kinder Morgan	Submitted 3/13/2008	Not processed as an ACT/OP. DAQEM informed Kinder Morgan to submit the requested permitting actions with their Title V renewal,
Letter	Kinder Morgan	Submitted 10/20/2008	Request to update Title V permit to include a 2,500 cfm catalytic oxidizer as part of EU: SR04
ATC Mod 19	DAQEM	Issued 5/30/2008	A 90 day permit to operate a portable combustion unit
Letter	Kinder Morgan	Submitted 9/11/2009	Requested Admin Change to Mod 18 Rev 1 ATC/OP for the type of fuel to be stored in specific storage tanks.

Type	Issuer	Date Issued/Submitted	Description
Letter	Kinder Morgan	Submitted 12/30/2009	Request to modify the Mod 18 Revision 1 ATC/OP: 1.) Change the source address, 2.) Remove facility wide emission limit, 3.) Remove monthly emission limits and compliance be based on a 12 month rolling average, 4.) Change the EU description for EU: B10, 5.) Allow the flare, EU: B02 to operate whenever
Letter	Kinder Morgan	Submitted 8/20/2010	This is a Notice-and-Go action under AQR Section 12.5.2.12. The action is to replace the IFR in EU: A13, with an improved design, reducing emissions from this EU. A TSD was prepared and the decrease in the tank PTE for EU: A13 (Tank 524) will be included in the Title V renewal.
Letter	Kinder Morgan	Submitted 8/23/2010	This is another letter from KM submitted as supplemental information for the Title V renewal, this letter: 1.) Provided a statement that the KM facility is subject to and in compliance with 40 CFR Part 63 Subpart BBBBBB, 2.) KM requests that ATC/OP's 12 through 21 be incorporated into the Title V renewal.
ATC Mod 21	DAQEM	Issued 8/31/2010	Combined Mod 20 into 21: 1.) ATC for paved and unpaved haul roads, 2.) A Cooling tower, 3.) 6 UST's, 4.) An ethanol unloading system, 5.) An Oil/water separator tank, 6.) An AST for Jet fuel additive, 7.) An oil storage tank
Title V Renewal	DAQEM	Issuance date pending this permitting action	Incorporated Modifications 12 through 21 into the Title V permit and Title V renewal modifications. They proposed an increase in throughput to EU: A08, A10 and A47 and increase the facility wide throughput from 55,336,450 bbls/yr to 92,671,688 bbls/yr which sums the individual tank throughputs since Mod 18 Rev 1.
Title V Notice and Go application	Letter from Kinder Morgan/ Calnev	Submitted 9/28/2010	Kinder Morgan/Calnev rescinds their request to replace the roof on EU:A13 which would have decreased the emission from this tank
Title V Insignificant Activity	Letter from Kinder Morgan/ Calnev	Submitted 1/20/2011	Kinder Morgan/Calnev submits a letter requesting that a 479 gallon AST be included in the Title V renewal as an insignificant activity
ATC Application processed as a Revision to the Title V	Kinder Morgan	Submitted 4/7/2011	Kinder Morgan/Calnev submits an application for the addition of a parts washer using VOC emitting solvent. The emission unit (EU: H13) to be added as a revision to the Title V, consistent with AQR 12.4.3.2(b), during the renewal.

The Title V permit revision was issued on February 9, 2005. Subsequently, the source had applied for ten modifications, numbers 12 through 21, which resulted in an increase in the source annual PTE and added new emission units.

Table III-C-2 shows the tanks at this facility, the year they were permitted, applicable federal requirements, tank size and control requirements.

During the Title V renewal process, review of the previous permit, source review comments, compliance officer comments and various ATC's, resulted in several corrections to specific EU Control Requirements and CFR applicabilities as follows:

- The control requirement for A13 was corrected from 'external floating roof' to 'internal floating roof' and Kb added as a CFR requirement because of the date permitted, is assumed to be the date of construction.
- EU: A14 had CFR requirements A and K removed pursuant to §60.110 and 60.110(b), it stores diesel fuel that has a maximum true vapor pressure (0.022 psi @ 100°) less than 0.51 psi and the volume is greater than 39,890 gallons.
- EU: A15 had CFR requirements A and K removed pursuant to §60.110 and 60.110(b), it stores diesel fuel that has a maximum true vapor pressure (0.022 psi @ 100° F) less than 0.51 psi and the volume is greater than 19,813 gallons but less than 39,890 gallons.
- EU: A16 control requirement was corrected from 'external floating roof' to 'internal floating roof' and Kb added as a CFR requirement because of the date permitted is assumed to be the date of construction.
- EU: A17; CFR applicability Kb added because of the date permitted is assumed to be the date of construction.
- EU: A19 and 20 had the CFR applicability requirements removed pursuant to §60.110 and 60.110(b), they store diesel fuel that has a maximum true vapor pressure (0.022 psi @ 100° F) less than 0.51 psi.
- EU: A21; CFR applicability Kb added because of the date permitted is assumed to be the date of construction.
- EU: A22, 23 and 24 the CFR applicability for A, K and/or Kb were removed pursuant to §60.110 and 60.110(b), they store JP-8 fuel that has a maximum true vapor pressure (0.31 psi @ 100° F) less than 0.51 psi.
- EU: A28, A45, A46, A47 and A48; CFR applicability Kb added because of the date permitted is assumed to be the date of construction.
- EU: A56 and 57; the CFR applicability for A and Kb were removed pursuant to §60.110 and 60.110(b), they store JP-A fuel that has a maximum true vapor pressure (0.029 psi @ 100° F) less than 0.51 psi.
- EU: A58 through A61; CFR applicability Kb added because of the date permitted is assumed to be the date of construction.
- EU: A45 and A46 (Tanks 548 and 549); based on a request from the source on September 12, 2011, the description of the tanks have been changed from internal floating roof to external floating roof. The request was made by Paul Liao and confirmed by Syed Hyder.

Table III-C-2: Various Tanks and Year Permitted

EU	Facility ID	Year Permitted	Applicable Subpart(s) of 40 CFR	Tank Size / Fuel Type	Control Requirement
A01	530	1973	A, K and BBBBBB	11,200 bbl/ multi-fuel	External Floating Roof with primary and secondary seals
A02	531	1973	A, K and BBBBBB	12,890 bbl/ multi-fuel	External Floating Roof with primary and secondary seals

EU	Facility ID	Year Permitted	Applicable Subpart(s) of 40 CFR	Tank Size / Fuel Type	Control Requirement
A03	532	1973	A, K and BBBB	8,080 bbl/ multi-fuel	External Floating Roof with primary and secondary seals
A04	533	1973	A, K and BBBB	11,330 bbl/ multi-fuel	External Floating Roof with primary and secondary seals
A05	534	1973	A, K and BBBB	8,080 bbl/ multi-fuel	External Floating Roof with primary and secondary seals
A06	535	1973	A, K and BBBB	8,080 bbl/ multi-fuel	External Floating Roof with primary and secondary seals
A07	536	1973	A, K and BBBB	17,550 bbl/multi-fuel	External Floating Roof with primary and secondary seals
A08	537	1973	A, K and BBBB	22,250 bbl/multi-fuel	External Floating Roof with primary and secondary seals
A09	538	1973	A, K and BBBB	11,330 bbl/multi-fuel	External Floating Roof with primary and secondary seals
A10	539	1973	A, K and BBBB	11,330 bbl/multi-fuel	External Floating Roof with primary and secondary seals
A11	540	1973	A, K and BBBB	16,320 bbl/multi-fuel	Internal Floating Roof with primary and secondary seals
A12	541	1973	A, K and BBBB	25,100 bbl/multi-fuel	External Floating Roof with primary and secondary seals
A13	524	1989	A, Kb and BBBB	18,000 bbl/multi-fuel	Internal Floating Roof with primary and secondary seals
A14	542	1973	none	45,000 bbl/Diesel	Internal Floating Roof, Primary and Secondary Seals
A15	543	1973	none	35,000 bbl Diesel	Internal Floating Roof, primary seals
A16	545	1990	A, Kb and BBBB	37,000 bbl/multi-fuel	Internal Floating Roof with primary and secondary seals
A17	546	1994	A, Kb and BBBB	40,000 bbl/multi-fuel	Internal Floating Roof, with primary and secondary seals
A18	522	1997	A and Kb	40,000 bbl/denatured Ethanol	Internal Floating Roof, with primary and secondary seals
A19	525	1996	none	50,000 bbl/Diesel	Fixed Roof
A20	526	1996	none	50,000 bbl/Diesel	Fixed Roof
A21	547	1995	A, Kb and BBBB	50,000 bbl/multi-fuel	Internal Floating Roof with primary and secondary seals
A22	512	1996	none	50,000 bbl/JP-8 and diesel fuel	Fixed Roof
A23	510	1973	none	40,000 bbl/JP-8 and diesel fuel	External Floating Roof, Primary Seals
A24	511	1973	none	40,000 bbl/JP-8 and diesel fuel	External Floating Roof, Primary Seals
A25	---	1996	None	1.3 bbl/Toluene	Fixed Roof

EU	Facility ID	Year Permitted	Applicable Subpart(s) of 40 CFR	Tank Size / Fuel Type	Control Requirement
A26	500 AIA	1996	None	252 bbl/Additive	Cone Roof, Internal Floating Roof
A27	501	1995	A and Kb	4,000 bbl/denatured Ethanol	Internal Floating Roof, Secondary Seals
A28	523	1990	A , Kb and BBBBBB	10,000 bbl/multi-fuel	Internal Floating Roof with primary and secondary seals
A29	544	1978	A , K and BBBBBB	11,000 bbl/multi-fuel	Internal Floating Roof with primary and secondary seals
A30	533 A	1996	None	252 bbl/Additive	Fixed Roof
A31	537 A	1996	None	464 bbl/Additive	Fixed Roof
A32	541 A	1996	None	380 bbl/Additive	Fixed Roof
A33	541 B	1996	None	380 bbl/Additive	Fixed Roof
A34	LV-TK-0005	1996	None	355 bbl/Additive	Fixed Roof
A35	Amoco	1996	None	143 bbl/Additive	Fixed Roof
A36	Shell	1996	None	143 bbl/Additive	Fixed Roof
A37	Diesel Dye	1996	None	12 bbl/Additive	Fixed Roof
A38	537 B	1996	None	119 bbl/Outboard Oil	Fixed Roof
A39	Additive M-1	1996	None	119 bbl/Additive	Fixed Roof
A41	Diesel Dye	1997	None	119 bbl/additive	Fixed Roof
A42	Additive B	1997	None	119 bbl/Additive	Fixed Roof
A45	548	1997	A , Kb and BBBBBB	10,100 bbl/multi-fuel	Domed External Floating Roof with primary and secondary seals
A46	549	1997	A , Kb and BBBBBB	12,890 bbl/multi-fuel	Domed External Floating Roof with primary and secondary seals
A47	550	1997	A , Kb and BBBBBB	12,890 bbl/multi-fuel	External Floating Roof with primary and secondary seals
A48	551	1997	A , Kb and BBBBBB	20,000 bbl/multi-fuel	Internal Floating Roof with primary and secondary seals
A49	LV-TK 0006	2001	None	24 bbl/Additive	Fixed Roof
A53	EXX-2	2001	None	238 bbl/Additive	Fixed Roof
A54	Tex-1	2001	None	238 bbl/Additive	Fixed Roof
A55	476	2001	None	238	Fixed Roof

EU	Facility ID	Year Permitted	Applicable Subpart(s) of 40 CFR	Tank Size / Fuel Type	Control Requirement
				bbl/Waste Water	
A56	513	1994	none	50,000 bbl/Jet A and diesel fuel	Internal Floating Roof with primary and secondary seals
A57	514	2001	none	50,000 bbl/Jet A and diesel fuel	Internal Floating Roof, with primary and secondary seals
A58	553	2003	A , Kb and BBBB	80,000 bbl/multi-fuel	Internal Floating Roof with primary and secondary seals
A59	554	2003	A , Kb and BBBB	80,000 bbl/multi-fuel	Internal Floating Roof with primary and secondary seals
A60	555	2003	A , Kb and BBBB	80,000 bbl/multi-fuel	Internal Floating Roof with primary and secondary seals
A61	552	2003	A , Kb and BBBB	40,000 bbl/multi-fuel	Internal Floating Roof with primary and secondary seals
B04	500	1988	A, Kb and BBBB	3,000 bbl/multi-fuel	External Floating Roof with primary and secondary seals
B05	521	1988	A, Kb and BBBB	5,000 bbl/multi-fuel	External Floating Roof with primary and secondary seals
D01	DG	1996	None	250 gallons/ Diesel	Fixed Roof
G01	---	1996	None	250 gallons/ Diesel	Fixed Roof
G02	---	1996	BBBB	250 gallons /Gasoline	Fixed Roof
H2	Mainline Sump	2010	None	1,000 gallon/waste fuel	Fixed roof UST with P/V valves
H3	Rack Sump	2010	None	3,000 gallon/waste fuel	Fixed roof UST with P/V valves
H4	New Mainline Sump	2010	None	4,200 gallon/waste fuel	Fixed roof UST with P/V valves
H6	Nellis Sump	2010	None	2,000 gallon/waste fuel	Fixed roof US with P/V valves T
H7	Rack Sump	2010	None	1,000 gallon/waste fuel	Fixed roof UST with P/V valves
H8	QC Sump	2010	None	100 gallon/waste liquids	Fixed roof UST with P/V valves
H10	Tank 500B	2010	None	11,000 gallon AST /Jet Fuel Additive	AST Tank with P/V valves and Carbon adsorption unit with 95% control efficiency
H11	OQS Tank	2010	None	Oil Water separator	AST VFR tank
H12	OST-	2010	None	1,000	Dual wall HFR AST. Tank

EU	Facility ID	Year Permitted	Applicable Subpart(s) of 40 CFR	Tank Size / Fuel Type	Control Requirement
	1200-DW			gallon/oil	with P/V valves and Carbon adsorption unit with 95% control efficiency

D. Operating Scenario

The Calnev facility is permitted to operate up to 24 hours per day, 8,760 hours per year.

General Operations

The primary process operations are the receiving of petroleum fuels which are diverted to aboveground storage tanks at the CalNev Las Vegas Terminal. From CalNev AST, transmix, ethanol, diesel fuel and gasoline can be transferred to tanker trucks via loading racks. Jet fuel is transferred directly from CalNev AST via a pipeline to military owned tanks located at the Nellis Air Force Base. CalNev does not own any of the products that are stored and distributed at the terminal. CalNev is a service company that provides transportation and distribution facilities to many customers. CalNev customers include major petroleum producers, independent traders, the military and many other end users of petroleum products.

As tanker trucks are loaded with gasoline and diesel fuel, the vapors from the loading are displaced to a vapor recovery system. The current vapor recovery system consists of a John Zink Carbon Adsorption/Desorption Unit (JZVRU) and a flare Vapor Combustion Unit (VCU) permitted as a backup unit, manufactured by Flare Industries, Inc. This VCU uses a saturator tank to enrich the vapor stream, a vapor bladder tank to collect the vapor stream and a propane pilot light to ignite the vapor stream. Both of these emission units are listed in the current permit.

Several underground sumps are used in the collection, transfer and processing of oily waters generated during normal operations. This includes water draws from tank bottoms, contact water generated at the loading racks, laboratory samples and rainwater runoff. An oil water separator is used to process this oily water mixture. The recovered oil is transferred to one of several AST permitted to store transmix. The water is sent to a steel evaporation containment vessel.

Diesel Fire Pump

The facility has one diesel powered firepump, EU; D02 which is used to supply water to a hydrant system. The firepump engine receives fuel from a 250 gallon above ground diesel storage tank, EU: D01. EU: D02 is permitted to operate not more than 2 hours per day and 120 hours per year for testing and maintenance purposes. Its operation during an emergency is not limited.

Soil and Groundwater Remediation System

The remediation system is used to clean up soil and ground water contamination caused by the operation of the facility. The soil and groundwater remediation unit, EU: SR04 is an air stripper and soil/groundwater vapor extraction system. This unit uses propane as the auxiliary (ignition) fuel and is designed to operate as a thermal oxidizer when the VOC effluent vapor concentration is greater than 3,000 ppmv and as a catalytic oxidizer when the concentration of the VOC effluent vapors drops below 3,000 ppm and can maintain the destruction efficiency down to 1,000 ppm. The unit uses the manufacturer's guaranteed emissions rate of not more than 2.4 mg/l of VOC. The efficiency of the unit shall be a minimum of 98 percent destruction of VOC and HAPs for the catalytic oxidizer and a minimum of 98.5 percent destruction of VOC and HAPs emissions for the thermal oxidizer. To ensure compliance with the emission limits, the concentration of the exhaust stream is monitored. In thermal oxidation mode, the temperature of the device must be maintained at or above 1,450°F. If the unit is operated using the catalytic oxidizer, the operating temperature shall be maintained at or above 700°F. If the temperature monitor malfunctions the unit shall not be used until repairs are completed and the unit is operating properly.

Fuel Storage and Additive Storage Tanks

The source's annual throughput of the fuel storage and additive tanks shall not exceed 107,221,629 barrels (4,501,176,400 gallons) per any twelve consecutive months. The type of fuel, fuel additive, or other liquid mixtures stored in the individual tanks are limited to those products listed in Tables IV-D-15 and IV-D-16 of this TSD. This limit reflects the total allowable throughputs for all tanks combined.

Loading Racks

The loading racks, EU: B01 is the method of which all petroleum products are loaded into tanker trucks for delivery to Calnev customers. The loading racks have a throughput limit of 35,379,927 barrels per twelve consecutive months. Of these 35,379,927 barrels, the loading of gasoline is limited to 23,268,531 barrels per any twelve consecutive months. The John Zink Series 2000 high efficiency Adsorption/Absorption Hydrocarbon Vapor Recovery Unit, EU: B02, is the primary emission control device for the loading racks and shall be operated during all products loading except during documented upset/breakdowns or maintenance to the EU: B02. During upset/breakdowns or maintenance occurrences, the flare, EU: B10, shall be used as the emission control device. Monitoring for compliance is with a non-dispersive infrared (NDIR) analyzer that continuously monitors VOC emissions from the exhaust of the on-line carbon bed. The on-line carbon bed exhaust concentration has an emission limit of 0.02 pounds of VOC per 1,000 gallons of product loaded (2.4 milligrams of VOC per liter of product loaded) over any rolling four-hour averaging period.

Auxiliary Flare

The auxiliary flare is the backup control device to the carbon adsorption unit, EU: B02. It is limited to operate not more than 438 hours per year and only during upset/breakdowns or maintenance to the EU: B02.

Paved and Unpaved Haul Roads

The haul roads on this site, EU: E01, are the largest contributor of PM₁₀ emissions. Haul roads within the facility are used for the transport of fuel off site, maintenance and repair functions. To meet the limit of 20 percent opacity, the roads must be maintained at least 90 percent control. There is a total vehicle trip limit of 177,375 trips per year.

Cooling Tower

The cooling tower cools water that is used as a heat absorber in the vapor recovery system, EU: B02. The cooled water moves through piping and removes heat from the circulating gasoline inside the recovery tank of EU: B02. The cooled gasoline is then used as an adsorbent to recover hydrocarbon vapors from the carbon adsorption unit during the carbon regeneration cycle. The unit has inherent emission controls in the form of drift eliminators that minimize loss of particulate matter as airborne particles by limiting the drift loss to 0.001 percent and a maximum manufacturer's recommended TDS content that should not exceed 2,000 ppm.

Ethanol Unloading System

The ethanol unloading system is used to unload ethanol from railcars or tanker trucks to the ethanol storage tanks for blending with gasoline; the system includes 12 stations, each with an unloading arm. To control the emission from the process, the unit will be vented to the existing JZVRU, EU: B02. The ethanol unloading system has a limit of 11,986,961 gallons of product loaded per year.

Sump Tanks, Oil Water Separator and Oil Storage Tank

The oil water separator and sump tanks are used as part of the source's groundwater extraction and treatment system. These sump tanks collect fuel from the prover when serviced and from thermal and pipe line pop-off relief. The rack 6 sump is used to collect spillage from the loading rack lanes. The quality control lab sump is used for products drained from fuel samples collected for analysis. The oil storage tank is limited to a throughput that shall not exceed 365,000 gallons per year. All tanks shall be equipped with pressure/vacuum valves to control emissions.

Piping's and Fittings

Fugitive emissions EU: B06, occur from the various pipes, fittings, flanges, pump seals, valves, connectors and loading arm valves.

Parts Washer

Fugitive VOC emissions from EU: H13, a parts washer, occurs from agitation of the solvent and from the spray head.

E. Proposed Exemptions

Kinder Morgan has requested no exemptions.

IV. EMISSIONS INFORMATION

A. Total Source Potential to Emit

The source total PTE is the addition or subtraction of the ATC/OP NEI values for Modifications 12, 16, 18 and 21 that have been issued since the Part 70 Title V permit revision on February 9, 2005, added to the existing Title V PTE. The source total PTE for this Title V renewal is presented in Table IV-A-1.

Table IV-A-1: Source Total PTE

	PM₁₀	NO_x	CO	SO_x	VOC	HAP¹
tons/year	8.35	2.52	2.85	0.16	183.93	10.32

¹The 10 tons per year HAP emissions listed here is a combined HAP emission and therefore, the source is not a major source of any single or combined HAP's.

Kinder Morgan is a major source of VOC and a minor source of PM₁₀, NO_x, CO, SO_x and HAP.

B. Equipment Description

Storage vessels that are present on site are on the largest sources of VOC emissions. Different levels of emissions controls were installed on the storage tanks based on the requirements of the regulations that were applicable at the time of construction and permitting (see Table III-C-2). Retrofitting was required for 19 of the storage tanks as a result of a Notice of Violation issued by EPA on September 20, 2000.

In the February 9, 2005, Part 70 Title V permit revision, the storage tanks were permitted to store specific fuel types. Kinder Morgan submitted a letter dated September 11, 2009, requesting that specified tanks be permitted to hold multi fuels such as premium, regular and sub-grade gasoline, diesel fuel, JP-8 fuel, Jet-A fuel, transmix (waste fuel that is a mix of different fuel types) and fuel additives that are added to fuels based on customer specifications.

The following is the equipment description including the equipment added from modifications 12 through 21 that are in the Part 70 Title V permit.

Storage Tanks

There are a total of 70 fuel, fuel additive, oil and waste fuel product tanks of various sizes. The design type and controls are as listed below:

- Twelve tanks, EU: A01 through A12 are equipped with external floating roofs with primary and secondary seals as the control methods.
- Twenty tanks, EU: A13, A16, A17, A18, A21, A27, A28, A29, A45 through A48, A56, A57, A58, A59, A60, A61, B04, B05, are equipped with internal floating roofs with primary and secondary seals.
- One tank, EU: A14, is equipped with IFR with primary and secondary seals.
- One tank, EU: A15, is equipped with only a primary seal.
- Twenty-five tanks, EU: A19, A20, A22, A25, A30 through A39, A41, A42, A49, A53, A54, A55, D01, G01, G02, H10 and H12, are equipped with fixed roofs.
- Two tanks, EU: A23 and A24, are equipped with EFR with primary seals.
- Six tanks EU: H2, H3, H4 and H6, H7 and H8, are UST with fixed roofs and P/V valves.
- One tank, EU: A26, has an IFR.
- One tank, EU: H11, is a AST with P/V valves.
- One tank, EU: H12, is a HFR AST with, P/V valves and carbon adsorption as the control device.

Of the above tanks:

- 28 can store multi fuels; i.e. gasoline, diesel, denatured alcohol, transmix and jet fuel;
- 7 are dedicated for diesel fuel;
- 6 are dedicated for Jet fuel;
- 2 are dedicated for denatured ethanol;
- 1 is dedicated for toluene,
- 1 is dedicated for methyl carbitol solvent;
- 6 are for gasoline additives;
- 1 is for diesel dye;
- 1 is for outboard fuel dye;
- 6 are for gasoline detergent additive;
- 4 are for waste water;
- 1 is dedicated gasoline storage;
- 3 are sump tanks for waste fuel and water;
- 1 is for jet fuel additive;
- 1 is a water oil separator tank; and
- 1 is for oil

Table IV-C-1 contains complete descriptions of all the tanks at the source.

Fugitive Emission Sources

- EU: B01: fugitive emissions and miscellaneous leaks from the loading racks.
- EU: B06: miscellaneous losses from valves, flanges, pumps and vapor control losses.
- Nellis Line Prover, EU: P1
- Main Line Prover, EU: P2

It is through the loading racks that the assorted fuels stored onsite are transferred into tanker trucks for transport of the fuels to their respective commercial facilities. Fugitive emissions (EU: B01) occur from the loading of fuels.

There are fugitive VOC emissions (EU: B06) from pump seals, valves, flanges, connectors, and loading arm valves accounting for leaks, miscellaneous losses, and vapor control losses that occur normally with these types of equipment.

The mainline provers (EU: P1 and P2) are used on the pipelines entering and leaving the terminal to verify calibration of the flow meters. VOC emissions from these provers occur during servicing when a specific volume of petroleum product is drained from the provers, emitting VOC and HAP.

Vapor Recovery Units (VRU) EU: B02 and B10

- EU: B02 is the John Zink VRU and is the primary emissions control on the loading racks.
- EU: B10, the flare, is the auxiliary emission control device for the loading racks.
- EU: H9, the Ethanol unloading system, is vented to the VRU: EU: B02.

The VOC vapors from the loading racks and the ethanol unloading system (EU: H9) are vented through the John Zink VRU (EU: B02) as the primary method of control for pollutants. The flare (EU: B10) acts as a secondary pollution control device that is operated during maintenance or upset/breakdown of the JZVRU.

Diesel Engine

- EU: D02 is a diesel powered emergency firepump.

The diesel powered firepump is on site to provide adequate water pressure for emergency fire suppression.

Roads

- EU: E01 represents industrial haul roads and EU: H1 represents the service roads within the facility.

The roads on this site are the biggest contributor to PM₁₀ emissions at the facility. These roads are paved and unpaved.

Waste Water Treatment

- EU: F01 is the water surge tank.
- EU: F04 is an open topped evaporation tank.

- EU: F05 and F06 are underground storage tanks for wastewater run-off.
- EU: H10 is an oil water separator tank.

The waste water treatment tanks collect and store run-off from rain. It is held in various storage and surge tanks before being routed into the open evaporation tank where the VOC vapors evaporate into the atmosphere and the remaining water goes is returned to the water treatment system.

Soil and Groundwater Remediation

- EU: SR04 is a Baker soil and groundwater vapor extraction unit.

The remediation project is the third largest contributor of VOC emissions at the Calnev site. The Baker 6,000 scfm Thermal Oxidizer (unit SR04) is an air stripper and soil and groundwater vapor extraction system that operates up to 8,760 hours per year. It is used to remediate the soil and groundwater underneath the Calnev site. The Baker unit is designed to operate in a thermal oxidation mode with VOC concentrations between 7,000 ppm (maximum allowable concentration) and 3,000 ppm. At these concentrations the unit operates at a 98.5 percent destructive rated efficiency (DRE) for both VOCs and HAPs. Once concentrations fall below 3,000 ppm, thermal oxidation efficiencies drop off markedly. The Baker unit can then operate in a catalytic oxidative mode that can attain a 98 percent DRE down to 1,000 ppm concentrations. Once beneath this 1,000 ppm concentration threshold, the unit can no longer maintain a 98 percent DRE, the emissions of the unit are not to exceed the permitted pound-per-hour limits.

Waste Fuel Sump Tanks

- EU: H2, a 1,000 gallon mainline sump (UST).
- EU: H3, a 3,000 gallon underground rack sump (UST).
- EU: H4, a 4,200 gallon underground mainline sump (UST).
- EU: H6, a 2,000 gallon Nellis sump (UST) for JP-8 fuel.
- EU: H7, a 1,000 gallon Rack sump (UST).
- EU: H8, a 100 gallon QC control lab sump (UST).

The various sump tanks recover waste fuel run-off from the loading rack lanes and laboratory test samples waste.

Cooling Tower

- EU: H5, Baltimore Aircoil Cooling Tower.

The cooling tower is used within the VRU system to remove heat from the circulating gasoline that is used as an absorbent to recover the hydrocarbon vapors as product during regeneration of the VRU (EU: B02) carbon bed.

Parts Washer

- EU: R7D Fountain Industries Company Parts Washer

The parts washer is used as a degreaser of machine and mechanical parts.

C. Emission Units

Table IV-C-1 lists the emission units at the Calnev facility.

Table IV-C-1: Emission Units and Equipment Description

EU	Equipment ID Number	Description and Product Storage
A01	Tank 530	External floating roof w/primary and secondary seal, 11,200 bbl: gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A02	Tank 531	External floating roof w/primary and secondary seal, 12,890 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A03	Tank 532	External floating roof w/primary and secondary seal 8,080 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A04	Tank 533	External floating roof w/primary and secondary seal 11,330 bbl : gasoline, diesel, denatured ethanol, transmix , biodiesel, aviation gasoline and Jet Fuel
A05	Tank 534	External floating roof w/primary and secondary seal 8,080 bbl : gasoline, diesel, denatured ethanol, transmix , biodiesel, aviation gasoline and Jet Fuel
A06	Tank 535	External floating roof w/primary and secondary seal 8,080 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A07	Tank 536	External floating roof w/primary and secondary seal 17,550 bbl : gasoline, diesel, denatured ethanol, transmix , biodiesel, aviation gasoline and Jet Fuel
A08	Tank 537	External floating roof w/primary and secondary seal 22,250 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A09	Tank 538	External floating roof w/primary and secondary seal 11,330 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A10	Tank 539	External floating roof w/primary and secondary seal 11,330 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A11	Tank 540	Internal floating roof w/primary and secondary seal 16,320 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A12	Tank 541	External floating roof w/primary and secondary seal 25,100 bbl : gasoline, diesel, denatured ethanol, transmix , biodiesel, aviation gasoline and Jet Fuel
A13	Tank 524	Internal floating roof w/primary and secondary seal 18,000 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A14	Tank 542	Internal floating roof w/primary and secondary seal; 45,000 bbl diesel
A15	Tank 543	Internal floating roof w/primary seal 35,000 bbl diesel
A16	Tank 545	Internal floating roof w/primary and secondary seal 37,000 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A17	Tank 546	Internal floating roof w/primary and secondary seal 40,000 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A18	Tank 522	Internal floating roof w/primary and secondary seal 4,000 bbl denatured ethanol
A19	Tank 525	Fixed roof 50,000 bbl diesel
A20	Tank 526	Fixed roof 50,000 bbl diesel
A21	Tank 547	Internal floating roof w/primary and secondary seal 50,000 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A22	Tank 512	Fixed roof 50,000 bbl JP-8 and diesel fuel
A23	Tank 510	External floating roof primary seal 40,000 bbl JP-8 and diesel fuel

EU	Equipment ID Number	Description and Product Storage
A24	Tank 511	External floating roof primary seal 40,000 bbl JP-8 and diesel fuel
A25	ASA Conductivity improver	Fixed roof 1.3 bbl additive
A26	Tank 500AIA	Internal floating roof 252 bbl additive
A27	Tank 501	Internal floating roof w/primary and secondary seal 4,000 bbl denatured ethanol
A28	Tank 523	Internal floating roof w/primary and secondary seal 10,000 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A29	Tank 544	Internal floating roof w/primary and secondary seal 11,000 bbl : gasoline, diesel, denatured ethanol, transmix , biodiesel, aviation gasoline and Jet Fuel
A30	Tank 533A	Fixed roof 252 bbl gasoline additive
A31	Tank 537A	Fixed roof 464 bbl gasoline additive
A32	Tank 541A	Fixed roof 380 bbl gasoline additive
A33	Tank 541B	Fixed roof 380 bbl gasoline additive
A34	Tank LV-TK-0005	Fixed roof 355 bbl gasoline additive
A35	Tank Amoco storage	Fixed roof 143 bbl gasoline additive
A36	Tank Shell Storage	Fixed roof 143 bbl gasoline additive
A37	Tank diesel dye	Fixed roof 12 bbl diesel dye
A38	Tank 537B	Fixed roof 262 bbl outboard dye
A39	Tank Add M-1	Fixed roof 119 bbl gasoline detergent additive
A41	Diesel dye	Fixed roof 119 bbl gasoline detergent additive
A42	Tank add tank B	Fixed roof 119 bbl gasoline detergent additive
A45	Tank 548	Domed External floating roof w/primary and secondary seal 10,100 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A46	Tank 549	Domed External floating roof w/primary and secondary seal 12,890 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A47	Tank 550	Internal floating roof w/primary and secondary seal 12,890 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A48	Tank 551	Internal floating roof w/primary and secondary seal 20,000 bbl : gasoline, diesel, denatured ethanol, transmix, biodiesel, aviation gasoline and Jet Fuel
A49	Tank LV-TK 0006	Fixed roof 24 bbl gasoline detergent additive
A53	Tank EXX-2	Fixed roof 238 bbl gasoline detergent additive
A54	Tank Tex-1	Fixed roof 238 bbl gasoline detergent additive

EU	Equipment ID Number	Description and Product Storage
A55	Tank 476	Fixed roof 238 bbl waste water
A56	Tank 513	Internal floating roof w/primary and secondary seal 50,000 bbl Jet A and diesel fuel
A57	Tank 514	Internal floating roof w/primary and secondary seal 50,000 bbl Jet A and diesel fuel
A58	Tank 553	Internal floating roof w/primary and secondary seals 80,000 bbl : gasoline, diesel, denatured ethanol, transmix biodiesel, aviation gasoline and Jet Fuel
A59	Tank 554	Internal floating roof w/primary and secondary seals 80,000 bbl : gasoline, diesel, denatured ethanol, transmix biodiesel, aviation gasoline and Jet Fuel
A60	Tank 555	Internal floating roof w/primary and secondary seals 80,000 bbl : gasoline, diesel, denatured ethanol, transmix biodiesel, aviation gasoline and Jet Fuel
A61	Tank 552	Internal floating roof w/primary and secondary seals 40,000 bbl : gasoline, diesel, denatured ethanol, transmix biodiesel, aviation gasoline and Jet Fuel
B01	Loading lanes fugitive emissions	Miscellaneous losses/leaks-loading racks
B02	John Zink VRU	Vapor control unit, loading lanes
B04	Tank 500	Internal floating roof w/primary and secondary seal 3,000 bbl : gasoline, diesel, denatured ethanol, transmix biodiesel, aviation gasoline and Jet Fuel
B05	Tank 521	Internal floating roof w/primary and secondary seal 5,000 bbl : gasoline, diesel, denatured ethanol, transmix biodiesel, aviation gasoline and Jet Fuel
B06	Piping and fittings throughout	Misc. losses/leaks-valves, flanges, pumps and VCU
B10	Flare processing unit	Vapor control unit loading lanes-includes saturator and vapor holding tank
D01	Tank DG	Fixed roof 250 gallons diesel
D02	Emergency Fire pump	Cummins Diesel 208 hp MN: 6BTA5.9-F1; SN: 45175100; DOM 1990; installed 1990
E01	Truck Traffic	Paved Industrial roads: total annual average conditions: 173,375 VMT/yr based on 0.5 mile RT
F01	Water surge tank	Waste water treatment: oil/water separator
F04	Evaporation Tank/pond	Waste water evaporation tank/pond
F05	Surge tank UST	Waste water run-off collection tank 10,000 gallons
F06	Surge tank UST	Waste water run-off collection tank 10,000 gallons
G01	Tank refueling	Fixed roof 250 gallon AST for diesel fuel
G02	Tanks refueling	Fixed roof 250 gallon AST for gasoline
SR04	Baker VRU	Soil and groundwater vapor extraction unit, 6,000 scfm

EU	Equipment ID Number	Description and Product Storage
P1	Nellis Line Prover	942 gallon horizontal loop piping circuit
P2	Main line prover	844 gallon horizontal loop piping circuit
H1	Haul Roads	1.0 mile paved and 0.60 miles unpaved haul roads
H2	UST Mainline sump	Mainline sump 1,000 gallon UST
H3	UST rack sump	Rack sump: 3,000 gallon UST
H4	UST Mainline sump	New mainline sump 4,200 gallon UST
H5	Cooling tower	Baltimore Aircoil Cooling Tower 220 gpm; M/N: F2841KE S/N: TBD
H6	Nellis Sump	Nellis delivery system sump, 2,000 gallons UST for JP-8 fuel
H7	Rack Sump	Rack 6 sump 1,000 gallon UST for diesel fuel
H8	QC Sump	Quality control lab sump 100 gallons UST
H9	Ethanol	Ethanol unloading system
H10	Tank 500B	11,000 gallon Jet Fuel Additive vertical-fixed roof AST
H11	OWS Tank	Oil Water separator tank
H12	OST-100-DW	1,000 gallon dual-walled, AST horizontal fixed roof tank for oil storage
H13	Parts Washer	35"W x 24"L x 17"D Parts Washer Tub

D. PTE

The following paragraphs describe the equipment added and/or the changes made by the ATC/OP's issued since the Part 70 Title V permit revision was issued February 9, 2005, and the proposed modifications to the Title V permit. The emissions were calculated for each ATC/OP permitted action. The NEI for each ATC/OP and the PTE of the Title V renewal was used in determining the total allowable emissions for the source shown in Table IV-A-1.

The PTE estimates were based on throughputs, operational limitations, and HAP content of fuels and was calculated using published emission factors and calculation methods. Emission controls include internal and external floating roof tanks with primary and secondary seals, fixed roof tanks, a carbon adsorption system, a backup flare vapor combustion unit and a soil and groundwater remediation system.

MODIFICATION 12

An application for Modification 12 was submitted by Calnev on July 28, 2005, and was issued October 25, 2006. This modification requested an increase in the throughput for Tanks 553 (EU: A58), 554 (EU: A59) and 555 (EU: A60) with corresponding changes in tank fittings, from the current 37 ½ turn-overs per tank to:

- Tank 553 (EU: A58) 60 turn-overs per year; increasing the throughput from 126,000,000 gallons/year to 302,400,000 gallons/year.

- Tanks 554 (EU: A59) and 555 (EU: A60), 180 turn-overs each, per year. Increasing the throughput from 126,000,000 gallons/year to 604,800,000 gallons per year, per tank.

The increase in throughput as a result of the increase in turn-overs, and the PTE of the affected tanks is shown in Table IV-D-1. The PTE was calculated using the EPA TANKS 4.09 program.

PROPOSED

Table IV-D-1: Modification 12: Throughput and PTE Increase for EU: A58, A59 and A60

EU	Unit Number	Emissions Based On	Maximum Annual Throughput (gal/yr) ¹	PTE (pounds per year)							
				VOC	Total HAP	Benzene	Ethyl benzene	Hexane	Toluene	2,2,4-trimethyl pentane	Xylenes
A58	553	Gasoline	302,400,000	7,657	398.15	68.91	7.66	122.51	99.54	61.25	38.28
A59	554	Gasoline	604,800,000	6,139	319.22	55.25	6.14	98.22	79.8	49.11	30.69
A60	555	Gasoline	604,800,000	6,139	319.22	55.25	6.14	98.22	79.8	49.11	30.69
Total pounds per year				19,935	1,036.59	179.41	19.94	318.95	259.14	159.47	99.66
Tons per year				9.97	0.52	0.09	0.01	0.16	0.13	0.08	0.05

¹ Maximum annual throughput for EU: A58 is based on 90 turn-overs per year. For EU: A59 and A60, it is based on 180 turn-overs per tank per year.

On February 6, 2006, Calnev submitted a letter as supplemental information to the Modification 12 application that requested the addition of a 'lubricity additive storage tank' to the facility. This tank is exempt from permitting pursuant to AQR Section 12 in effect at the time of permitting and is not subject to any of the requirements of 40 CFR Part 60, 61 or 63 due to its capacity and/or storage product RVP.

Table IV-D-2: Categorically Exempt Emission Unit.

Equipment	Description
Tank 535-A	Diesel Lubricity Additive Storage Tank, 10,000 gallons, 0.026 psia
Tank 479	479 gallon AST

On March 27, 2006, Calnev submitted another letter as supplemental information to the Modification 12 application requesting an administrative permit revision for Tank 542 (EU: A14) to replace the primary seal with a set of primary and secondary seals. This administrative change did not affect the PTE of the affected emission units.

The PTE for Modification 12 and the PTE for Modification 6 was used to calculate the NEI for this permitting action and is presented in Table IV-D-3.

Table IV-D-3: Source PTE, Modification 12 PTE and the NEI (tons per year)

Pollutant	PM ₁₀	NO _x	CO	SO ₂	VOC	HAPs
Facility PTE, Mod 12	6.88	2.52	2.85	0.16	175.24	9.48
Modification 6 PTE	6.88	2.52	2.85	0.16	176.90	9.61
NEI	0.00	0.00	0.00	0.00	- 1.66	- 0.13

MODIFICATION 16

The ATC/OP Modification 16 combined Modifications 13, 14 and 15. The Modification 16 application was submitted on November 12, 2006, and issued March 5, 2007. The requested permitting actions in Modification 16 were to:

Modification 13 requested an increase in the throughput as follows:

- For tank 525 (EU: A19): increased throughput from 113,400,000 gallons per year to 200,000,000 gallons per year, and;
- For tank 541 (EU: A12) increased throughput from 63,300,000 gallon per year to 222,000,000 gallons per year;

Modification 14, submitted on August 11, 2006, requested to update the emissions from fittings, and increase the number of fittings due to an expansion project involving additional piping and associated fittings. See Table IV-D-5 below.

Modification 15, submitted September 26, 2006, requested the following modifications:

- Change the description of tank 540 (EU: A11) from the existing 'external floating roof' to 'internal floating roof'; (Mod 15)
- Increase throughput to Tank 540 (EU: A11) from 41,000,000 gallons/year to 137,000,000 gallons per year with an increase in PTE. (Mod 15)
- Change the product stored in tank 523 (EU: A28) and 552 (EU: A61) from single to multi-fuels; (Mod 15) and recalculated the PTE for these tanks.

Modification 16 was submitted on November 21, 2006 and requested the following modification:

- Rebuild the loading lane #10. (Mod 16)

The source reported in their application for Modification 16 that the rebuilding of loading lane # 10 will not result in any emission increase or decrease; therefore, this change is not noted in Modification 16.

The change in throughput to tanks 540 (EU: A11), 525 (EU: A19) and 541 (EU: A12) resulted in an increase to the facility PTE. The change in PTE from this permitting action is presented in Table IV-D-4.

PROPOSED

Table IV-D-4: Modification 16: Increase in Throughput and Resulting PTE

EU	Unit Number	Emission Based On	Maximum Annual Throughput (gal/yr) ¹	PTE (pounds per year)							
				VOC	Total HAP	Benzene	Ethyl benzene	Hexane	Toluene	2,2,4-trimethyl pentane	Xylenes
A19	525	Diesel	200,000,000	3,140	10.68	0.03	0.31	0.00	0.94	0.00	9.11
A12	541	Gasoline	222,000,000	3,519	182.99	31.67	3.52	56.30	45.75	28.15	17.60
A11	540	Gasoline	137,000,000	2,901	150.85	26.11	2.90	46.42	37.71	23.21	14.51
A61	552	Gasoline	126,000,000	4,126	214.55	37.13	4.13	66.02	53.64	33.01	20.63
A28	523	Gasoline	23,580,8000	2,692	139.98	24.23	2.69	43.07	35.00	21.54	13.46
Total pounds per year				16,378	699.05	119.17	13.55	211.81	173.04	105.91	75.31
Tons per year				8.19	0.70	0.12	0.01	0.21	0.17	0.11	0.08

Modification 14 requested an increase in the number of fittings due to the expansion project at the facility and a recalculation of the PTE for EU: B06 using new emission factors. The use of different emission factors decreased the PTE of VOC's for EU: B06 by 0.21 tons per year from the Part 70 Title V permit revision issued February 9, 2005. The Modification 16 PTE for EU: B06 is presented in Table IV-D-5.

Table IV-D-5: Modification 16 PTE of EU: B06

Fitting Type	Number of fittings	Emission Factors (lbs/unit-hr)	PTE	
			pounds per hour	tons per year
Pumps and seals in liquid service	54	0.00119	0.06	0.25
Valves (light liquid)	2,485	0.0000946	0.24	1.05
Valves (gas)	12	0.0000286	0.000335	0.00147
Connectors (light liquid)	4,441	0.0000176	0.08	0.34
Connectors (gas)	31	0.0000925	0.00289	0.0126
Loading arm valves (gas service)	20	0.045	0.90	3.94
Loading arm valves (liquid service)	100	0.000870	0.09	0.39
Other	246	0.000286	0.07	0.31
Total VOC			1.44	6.30
Total HAP (4.7% of VOC)			0.07	0.30

The source PTE and the NEI for Modification 16 is presented in Table IV-D-6.

Table IV-D-6: Modification 16 PTE and NEI

	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
Mod 16 Source PTE	6.88	2.52	2.85	0.16	178.73	9.63
Mod 12 PTE	6.88	2.52	2.85	0.16	175.24	9.48
Mod 12 PTE calculated with updated fitting emission factors	6.88	2.52	2.85	0.16	174.26	9.43
NEI	0.00	0.00	0.00	0.00	4.47	0.20

MODIFICATION 18 REVISION 1

Modification 18 Revision 1 ATC/OP was issued April 10, 2008, and incorporated Modifications 17 and 18. A permit labeled Modification 17 was never issued and the requested changes were incorporated in the Modification 18 permit. Modification 18 Revision 1 requested the following permitting actions:

- Retrofitted EU: B02 (John Zink VRU) with a new replacement blower (Mod 18).

Calnev estimated that with the replacement of the blower on the JZVRU (EU: B02) the number of components removed from the existing system would equal those installed with the new system with no net increase in fugitive emissions.

- Changed the fuel type to be stored in Tanks 537 (EU: A08), 539 (EU: A10) and 550 (EU: A47) from single fuels to multi-fuels. (Mod 17)
- Added two Line Provers (EU: P1 and P2) which increased the VOC and HAP PTE. (Mod 18)

The two new emission units (EU: P1 and P2) emit VOC and HAP. The calculation of the PTE of these emission units are shown in Table IV-D-7.

Table IV-D-7: Modification 18 Revision 1; PTE of New Emission Units P1 and P2

EU	Description	Volume (gal)	VOC EF (lbs/gal) ¹	Services/Year	PTE			
					lbs/day		tons/year	
					VOC	HAP	VOC	HAP
P1	Nellis-Line Prover	942	0.01064	12	10.02	0.52	0.06	0.01
P2	Main-Line Prover	844	0.01064	12	8.98	0.47	0.05	0.01

¹ EF from equation 1 AP-42 Section 5.2

- Increased throughput to tank 537 (EU: A08) from 56,100,000 gallon per year to 90,000,000 gallon per year. (Mod 17)
- Increased throughput to tank 539 (EU: A10) from 28,560,000 gallons per year to 50,000,000 gallon per year. (Mod 17)
- Increased throughput to tank 550 (EU: A47) from 32,460,000 gallon per year to 70,000,000 gallons per year. (Mod 17)

The Modification 18 Revision 1 increased the throughput for tanks 537 (EU: A08) 539 (EU: A10) and 550 (EU: A47) and subsequent increase in the PTE is shown in Table IV-D-8.

Table IV-D-8: Modification 18 Revision 1; Tanks 537 (EU: A08), 539 (EU: A10) and 550 (EU: A47) Throughput Increase and Resulting PTE

EU	Facility Unit Number	Emission Based On	Maximum Annual Throughput (gal/yr) ¹	PTE (pounds per year) ¹							
				VOC	Total HAP	Benzene	Ethyl benzene	Hexane	Toluene	2,2,4-trimethyl pentane	Xylenes
A08	537	Gasoline RVP 10	90,000,000	3,708	192.80	33.37	3.71	59.33	48.20	29.66	18.54
A10	539	Gasoline RVP 10	50,000,000	2,730	142.00	24.57	2.73	43.68	35.49	21.84	13.65
A47	550	Gasoline RVP 10	70,000,000	3,444	179.10	31.00	3.44	55.10	44.77	27.55	17.22
Total pounds per year				9,882	513.90	88.94	9.88	158.11	128.46	79.05	49.41
Tons per year				4.94	0.26	0.04	<0.01	0.08	0.06	0.04	0.02

¹ The PTE was calculated using EPA's TANK 4.09 program for estimating emissions from storage tanks.

The NEI for the modified storage tanks was calculated as the difference in the PTE and the average actual emissions of the affected emissions units (EU: A08, A10 and A47) from 2006 and 2007. The replacement of the EU: B10 blower did not increase or decrease the annual emissions of this emission unit and was therefore not included in the NEI calculation. The NEI of Modification 18 Revision 1 is shown in Tables IV-D-9 and 10.

Table IV-D-9: Modification 18 Revision 1 NEI for VOC (tons per year)

EU	Description	PTE	2007 Actuals	2006 Actuals	Average	NEI
A08	Tank 537	1.85	1.34	1.29	1.32	0.53
A10	Tank 539	1.37	0.98	0.96	0.97	0.40
A47	Tank 550	1.72	1.06	1.05	1.06	0.66
B01, B02, B10	Loading Racks ¹	76.59	n/a	n/a	n/a	0.00
P1	Nellis Line Prover	0.06	n/a	n/a	n/a	0.06
P2	Main Line Prover	0.05	n/a	n/a	n/a	0.05
VOC's Totals:		81.64	3.38	3.30	3.35	1.70

¹Although replacing the booster blower on the JZVRU (B02) is considered a modification and will potentially increase short-term emissions for these units, no annual increase in emissions is expected; therefore, NEI for these units is 0.

Table IV-D-10: Modification 18 Revision 1 NEI for HAP (tons per year)

EU	Description	PTE	2007 Actuals	2006 Actuals	Average	NEI
A08	Tank 537	0.10	0.07	0.07	0.07	0.03
A10	Tank 539	0.07	0.05	0.05	0.05	0.02
A47	Tank 550	0.09	0.06	0.06	0.06	0.03
B01, B02, B10	Loading Racks ¹	3.54	n/a	n/a	n/a	0.00
P1	Nellis Line Prover	0.01	n/a	n/a	n/a	0.01
P2	Main Line Prover	0.01	n/a	n/a	n/a	0.01
HAP's Totals:		3.82	0.18	0.18	0.18	0.10

¹Although replacing the booster blower on the JZVRU (B02) is considered a modification and will potentially increase short-term emissions for these units, no annual increase in emissions is expected; therefore, NEI for these units is 0.

MODIFICATION 19

Modification 19 ATC/OP was a temporary permit for the installation and operation of a portable combustion unit for VOC control. This permit was issued May 30, 2008 and expired August 30, 2008. The emission from this VOC control unit did not contribute to the source total PTE.

MODIFICATIONS 20 and 21

The Modification 20 ATC/OP application was submitted on December 30, 2009. Modification 20 was combined with Modification 21, which was submitted on December 19, 2009, and issued August 31, 2010. The permitting actions of Modifications 20 and 21 are as follows:

- Change the source address from the current '5049 N. Sloan Avenue' to the correct address of '5049 N. Sloan Lane'. (Mod 20)

- Remove the facility wide emissions limits found in the Part 70 Title V permit Condition III-B-1, Tables III-B-1, Source PTE and Allowable Emissions. (Mod 20)
- Removal of the monthly tank emission limits specified in permit conditions III-B-3, Table III-B-5 and that compliance with emission limits be demonstrated based on a rolling 12 month total emissions. (Mod 20)
- Change the description of the flare emission unit in Table III-A-3 (EU: B10) to include a saturator tank and vapor holding tank - loading lanes. (Mod 20)
- DAQEM denied a request to change the text of the permit pertaining to the use of the flare (EU: B10) to allow the flare to be used whenever any maintenance is done to the John Zink Vapor Recovery Unit (JZVRU, EU: B02) specifically, Calnev requested that the word 'scheduled' be removed from permit conditions B-2 and B-3. (Mod 20)
- Operate three sump tanks; a 1,000 gallon Underground Mainline Sump (EU: H2), a 3,000 gallon Underground Rack Sump (EU: H3) and a 4,200 gallon Underground New Mainline Sump (EU: H4). (Mod 20)
- Add a new emission unit, a Baltimore Aircoil Cooling Tower (EU: H5) M/N: F2841-KE. (Mod 20)
- Add 1.0 mile of paved and 0.60 miles of unpaved haul roads. (EU: H1). With a VMT limit of 3,850 per year. (Mod 21)
- Add a new 2,000 gallon (UST) Nellis Delivery System Sump (EU: H6) for JP-8. (Mod 21)
- Add a new 1,000 gallon (UST) Rack 6 Sump for diesel fuel (EU: H7). (Mod 21)
- Add a new 100 gallon (UST) Quality Control Lab Sump (EU: H8). (Mod 21)
- Add a new ethanol unloading system (EU: H9). (Mod 21)
- Add a new 11,000 gallon vertical fixed roof storage tank (AST) for Jet Fuel Additive (EU: H10). (Mod 21)
- Add a new oil/water separator tank (EU: H11). (Mod 21)
- Add a new 1,000 gallon dual wall horizontal fixed roof storage tank (AST) for oil storage (EU: H12). (Mod 21)

Table IV-D-11 lists the PTE of the new emission units for Modification 21.

Table IV-D-11: Modification 21: PTE of New Emission Units H1 through H12 (tons per year)

EU	Rating	Conditions	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
H1	1.60 miles	3,850 VMT/yr	1.46	0.00	0.00	0.00	0.00	0.00
H2	1,000 gallon UST	302,400 gal/yr	0.00	0.00	0.00	0.00	0.37	0.10
H3	3,000 gallon UST	806,400 gal/yr	0.00	0.00	0.00	0.00	1.04	0.26
H4	4,200 gallon UST	100,800 gal/yr	0.00	0.00	0.00	0.00	0.47	0.03
H5	220 gpm; 0.001% drift loss, 1,000 ppm TDS	8,760 hrs/yr	0.01	0.00	0.00	0.00	0.00	0.00
H6	2,000 gallon UST	75,600 gal/yr	0.00	0.00	0.00	0.00	0.01	0.01
H7	1,000 gallon UST	36,000 gal/yr	0.00	0.00	0.00	0.00	0.01	0.01
H8	100 gallon UST	7,200 gal/yr	0.00	0.00	0.00	0.00	0.05	0.01
H9 ³	Ethanol Unloading System w/VRU	11,986,961 gal of vapor/yr	0.00	0.00	0.00	0.00	0.18	0.00
H10 ¹	11,000 gallon VFR AST	132,000 gallons/yr	0.00	0.00	0.00	0.00	0.01	0.00
H11 ²	11,000 gallons	132,000 gal/yr	0.00	0.00	0.00	0.00	0.01	0.01
H12	1,000 gallon HFR AST	365,000 gal/yr	0.00	0.00	0.00	0.00	0.03	0.01
Total			1.47	0.0	0.0	0.0	2.22	0.44

¹ The PTE for H10 is based on Jet Fuel

² The PTE for H11 is based on gasoline, with and RVP of 10

³ The PTE of EU: H9 is based on the amount of vapor remaining in the pipes and fitting after unloading of the ethanol and then combusted through the VRU, it is not the throughput, For an explanation, see the Calnev spreadsheet in the source folder, submitted June 28, 2011.

Modification 21 added new emission units, therefore; the source total PTE increase and the NEI equaled the PTE of the new units. Modification 21 PTE, NEI and the source total PTE is presented in Table IV-D-12.

Table IV-D-12: Modification 21 PTE, NEI and Source PTE (tons per year)

	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
PTE Mod 18 Rev 1	6.88	2.52	2.85	0.16	178.94	9.70
PTE Mod 21	1.47	0.00	0.00	0.00	2.22	0.44
NEI Mod 21	1.47	0.00	0.00	0.00	2.22	0.44
Source Allowable	8.35	2.52	2.85	0.16	181.16	10.14

TITLE V RENEWAL

Kinder Morgan submitted an application for their Title V permit renewal on September 28, 2007. In this application Kinder Morgan requested the following as revisions to the Title V permit:

1. Increase the facility wide throughput from 55,336,450 barrels per year to 92,671,688 barrels per year;
2. Incorporate Modifications 12 through 21 into the Part 70 Title V permit renewal.

3. Permit specific tanks (EU: A01 through A13, A16, A17, A21, A28, A29, A45 through A48, A58 through A61, B04 and B05) to store gasoline, diesel, denatured ethanol, transmix or Jet fuel.
4. Permit EU: A18 and A27 to store denatured ethanol only.

A letter was received from Kinder Morgan dated December 30, 2009, requesting the following be completed during the Part 70 Title V permit renewal:

1. Change the source address to 5049 N Sloan Lane.
2. Remove the facility wide emission limit.
3. The monthly tank emission limits specified in Condition III-B-3, Table III-B-5 of the Title V permit, be removed and that compliance be demonstrated based on a rolling 12 month total emissions.
4. Change the description of the flare (B10) to include “saturator tank and vapor holding tank”, which are part of the flare system. Specifically changes in the Title V permit Table III-A-1 for B10 be revised as described above.
5. Change the text of the permit related to the use of the flare to allow the flare to be used whenever maintenance of any kind is performed on the JZVRU EU: B02, Specifically, CalNev requests that the word “scheduled” be removed from conditions B2 and B3. This request was denied by DAQEM.

Kinder Morgan submitted a request with the Modification 20 application to increase the throughput for:

1. Tank 525 (EU: A19) from the current 200,000,000 gallons per year to 350,000,000 gallon per year;
2. Tank 526 (EU: A20) from the currently permitted 126,000,000 gallon per year to 220,500,000 gallons per year and;
3. Tank 543 (EU: A15) from the current 88,200,000 gallon per year to 114,660,000 gallons per year.

This increase in the throughput for EU: A19, A20 and A15 could not be included in the ATC/OP Modification 21 where it was originally submitted because it would have increased the annual fuel throughput limit of the Part 70 Title V permit, therefore; this increase in throughput will be included, as requested by the source, in the Title V permit renewal as a revision. The source used EPA TANKS 4.09 program to estimate emission from tanks 543 (EU: A15), 525 (EU: A19) and 526 (EU: A20). The throughput and PTE is presented in Table IV-D-13.

On January 20, 2011, Kinder Morgan/Calnev submitted a letter requesting the addition of a 479 gallon AST as an insignificant activity that will be used for storage of product. The PTE of this tank is less than 0.10 tons per year of VOC.

Corrections and necessary changes were made to the Title V permit language on March 16 and 17th 2011 as follows:

- III-B-3-m, the words '*gasoline into*' were removed and the sentence '*examples of actions to accomplish this include training drivers in the hook up procedures and posting visible reminder signs at the affected loading racks*' was removed.
- III-B-3-n; the sentence '*...not allowed to be handled in such a manner that would result in vapor releases to the atmosphere for extended periods of time*' was replaced with '*..follow all regulatory requirements related to fuel handling to minimize vapor releases to the atmosphere*'.
- III-B-3-s; the word '*shall*' was inserted.
- III-B-3-t; the spelling of the word '*maintain*' was corrected
- III-B-3-u, the words '*the Permitted shall operate*' was added, and '*shall be used*' was removed.
- III-B-3-v, the words '*the Permitted shall operate*' was added, '*oxidation*' was changed to '*oxidizer*', '*of*' and '*shall be used*' were removed.
- III-C-11; the TDS testing method was inserted.
- III-B-1-c; the words '*over a four hour average*' was inserted to agree with III-C-15 language.
- III-C-18, the word '*facility*' was removed.
- III-B-1-e was added as an emission limitation (zero opacity) for EU: SR04 to agree with III-C-34.
- The haul road EU: E01 was given a production limit of 173,375 trips per year. This limitation was added to coincide with the emissions calculated for the emission unit. See email correspondence between DAQEM and the source relating to this subject. The source elected to utilize a limit on trips rather than a limit on miles for practicality purposes. Therefore, the round-trip distance for the haul road also required a limitation, which was established as one-half mile paved.

An application was received on April 7, 2011, which was processed as a Title V revision consistent with AQR 12.4.3.2(b). The Source requested to add an existing parts washer, See Table IV-D-25, with the following specifications:

- A 35"W x 24"L x17"D R&D Fountain Industries Company Parts Washer Tub with recirculation solvent pump

The VOC and HAP emissions are from the solvent, which will emit approximately 2,941.68 pounds of VOCs (1.47 tons) of VOC and 5.88 pounds of perchloroethylene (PERC) (0.003 tons) per year (controlled).

Uncontrolled PTE

The uncontrolled PTE used AP-42 Section 4.6, Solvent Degreasing, Table 4.6-2; *Cold Cleaner Entire Unit-surface area and duty cycle*. This table provided the emission factor of:

- 0.08 pounds/hour/square foot (area of the solvent tub)

The uncontrolled PTE used equation 1:

1. (area of parts cleaner tub)(hours of operation per year)(emission factor) = uncontrolled PTE
 - a. Area of parts cleaner tub = 35"W x 24"L = 5.83 ft²
 - b. Hours of operation = 8,760 per year
 - c. Emission factor = 0.08 lbs/hr/ft²
- (5.83 ft²)(8,760 hours/year)(0.08 lbs/hour/ft²) = 4,085.66 lbs/year = 2.04 tons/year

HAP uncontrolled PTE

From the MSDS the percent HAP as PERC is 0.2 percent of the total VOC content

- (4,085.66 pounds per year)(0.002 PERC) = 8.17 pounds per year = 0.004 tons/year

Controlled PTE Calculation

The controlled PTE was calculated using AP-42 Section 4.6, Solvent Degreasing, Table 4.6-2; *Cold Cleaner Entire Unit-surface area and duty cycle*. This table provided the emission factor of:

- 0.08 pounds/hour/square foot (area of the solvent tub).

The source referenced AP-42, Section 4.6 Table 4.6-3, *Total Emissions reduction from control device* for a reduction of emissions as listed below:

- Cover or enclosed design:.....13-38 percent reduction

Operating procedures:

- Proper use of equipment, and
- Waste solvent reclamation15-45 percent reduction

The source claimed a 30 percent reduction for the operating procedures but offered no explanation for this value. DAQEM has determined that without validation of an emissions reduction higher than the least value, 15 percent, that the least value will be accepted.

The overall emissions reduction will be 28 percent.

VOC Controlled PTE

The controlled PTE used equation 2:

2. (area of parts cleaner tub)(hours of operation per year)(emission factor)(control factor) = controlled PTE

- d. Area of parts cleaner tub = 35"W x 24"L = 5.83 ft²
- e. Hours of operation = 8,760 per year
- f. Emission factor = 0.08 lbs/hr/ft²
- g. Percent reduction = 28 percent
- h. The percent reduction is treated as a control efficiency (ce) and used to calculate a control factor (CF) by the equation:
 - $CF = (100-ce)/100 = (100-28)/100 = 0.72$

- $(5.83 \text{ ft}^2)(8,760 \text{ hrs/year})(0.08 \text{ lbs/hr/ft}^2)(0.72) = 2,941.68 \text{ lbs/year VOC} = 1.47 \text{ tons per year}$

The MSDS listed 0.2 percent PERC as the HAP content and is considered in the total VOC emissions.

HAP Controlled PTE

- $(2,941.68 \text{ lbs/year VOC}) \times (0.002 \text{ PERC}) = 5.88 \text{ pounds per year PERC} = 0.003 \text{ tpy}$

Table IV-D-13: Title V Renewal: Throughput and Emissions PTE Increase for Tanks 543 (EU: A15), 525 (EU: A19) and 526 (EU: A20)

EU	Unit Number	Emissions Based On	Maximum Annual Throughput (gal/yr) ¹	PTE (pounds per year) ¹							
				VOC	Total HAP	Benzene	Ethyl benzene	Hexane	Toluene	2,2,4-trimethyl pentane	Xylenes
A15	543	Diesel	114,660,000	358	18.60	3.21	0.36	5.71	4.64	2.86	1.79
A19	525	Diesel	350,000,000	3,916	203.60	35.24	3.92	62.65	50.90	31.33	19.58
A20	526	Diesel	220,500,000	3,148	163.70	28.33	3.15	50.36	40.91	25.18	15.74
Totals (lbs/yr)				7,422	385.90	66.78	7.43	118.72	96.45	59.37	37.11
Tons per year				3.71	0.19	0.03	0.01	0.06	0.05	0.03	0.02

The NEI for the increase in throughput to EU: A15, A19 and A20 was calculated and is shown in Table IV-D-14.

Table IV-D-14: Title V Renewal: NEI Calculation for the Increase in Throughput for EU: A15, A19 and A20 and the addition of EU: H13 (tons per year)

	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
PTE for throughput increase	0.00	0.00	0.00	0.00	3.71	0.19
Prior PTE of effected units	0.00	0.00	0.00	0.00	2.41	0.01
NEI	0.00	0.00	0.00	0.00	1.30	0.18
Mod 21 Source PTE	8.35	2.52	2.85	0.16	181.16	10.14
EU: H13 ¹	0.00	0.00	0.00	0.00	1.47	0.01
Source New PTE (Title V)	8.35	2.52	2.85	0.16	182.46	10.32

¹ The HAP emissions was rounded up from the calculated 0.003 to 0.01

Tables IV-D-16 through IV-D-25 below consolidate the ATC/OP actions detailed above, and the Modifications and revision to the Title V permit into the source total emission unit list and PTE calculations.

Table IV-D-15: Storage Tank Annual PTE and Annual Throughput Limitations

EU	Unit Number	Product	Emissions Based On	Annual Throughput Limitations (gal/yr)	PTE (pounds per year)							
					VOC	Total HAP	Benzene	Ethyl benzene	Hexane	Toluene	2,2,4-Trimethyl pentane	Xylenes
A01	530	multi fuel	gasoline RVP 10	28,560,000	2,951	153.44	26.56	2.95	47.21	36.36	23.61	14.75
A02	531	multi fuel	gasoline RVP 10	32,460,000	3,059	159.06	27.53	3.06	48.94	39.76	24.47	15.29
A03	532	multi fuel	gasoline RVP 10	20,340,000	2,550	132.59	22.95	2.55	40.80	33.15	20.40	12.75
A04	533	multi fuel	gasoline RVP 10	28,560,000	2,916	151.66	26.25	2.92	46.66	37.91	23.33	14.58
A05	534	multi fuel	gasoline RVP 10	20,340,000	2,550	132.59	22.95	2.55	40.80	33.15	20.40	12.75
A06	535	multi fuel	gasoline RVP 10	20,340,000	2,550	132.59	22.95	2.55	40.80	33.15	20.40	12.75
A07	536	multi fuel	gasoline RVP 10	44,220,000	3,456	179.70	31.10	3.46	55.29	44.93	27.65	17.28
A08	537	multi fuel	gasoline RVP 10	90,000,000	3,708	192.80	33.37	3.71	59.33	48.20	29.66	18.54
A09	538	multi fuel	gasoline RVP 10	28,560,000	2,916	151.66	26.25	2.92	46.66	37.91	23.33	14.58
A10	539	multi fuel	gasoline RVP 10	50,000,000	2,730	142.00	24.57	2.73	43.68	35.49	21.84	13.65
A11	540	multi fuel	gasoline RVP 10	41,100,000	3,444	173.87	30.09	3.34	53.50	43.47	26.75	16.72
A12	541	multi fuel	gasoline RVP 10	222,000,000	3,519	182.99	31.67	3.52	56.30	45.75	28.15	17.60
A13	524	multi fuel	gasoline RVP 10	50,760,000	3,044	158.27	27.39	3.04	48.70	39.57	24.35	15.22
A14	542	Diesel	diesel	118,500,000	358	1.20	0.01	0.05	0.00	0.11	0.00	1.04

EU	Unit Number	Product	Emissions Based On	Annual Throughput Limitations (gal/yr)	PTE (pounds per year)							
					VOC	Total HAP	Benzene	Ethyl benzene	Hexane	Toluene	2,2,4-Trimethyl pentane	Xylenes
A15	543	Diesel	diesel	114,660,000	358	18.60	3.21	0.36	5.71	4.64	2.86	1.79
A16	545	multi fuel	gasoline RVP 10	88,200,000	3,780	196.56	34.02	3.78	60.48	49.14	30.24	18.90
A17	546	multi fuel	gasoline RVP 10	100,800,000	6,045	314.35	54.41	6.05	96.72	78.59	48.36	30.23
A18	522	denatured ethanol	ethanol	9,000,000	240	0.00	0.00	0.00	0.00	0.00	0.00	0.00
A19	525	Diesel	diesel	350,000,000	3,916	203.60	35.24	3.92	62.65	50.90	31.33	19.58
A20	526	Diesel	diesel	220,500,000	3,148	163.70	28.33	3.15	50.36	40.91	25.18	15.74
A21	547	multi fuel	gasoline RVP 10	100,800,000	6,136	319.05	55.22	5.14	98.17	79.76	49.08	30.68
A22	512	JP-8	Jet kerosene	126,000,000	3,152	18.16	0.13	4.00	0.16	4.10	0.00	9.77
A23	510	JP-8	Jet kerosene	100,800,000	378	2.18	0.02	0.48	0.02	0.49	0.00	1.17
A24	511	JP-8	Jet kerosene	100,800,000	378	2.18	0.02	0.48	0.02	0.49	0.00	1.17
A27	501	denatured ethanol	ethanol	9,540,000	244	0.00	0.00	0.00	0.00	0.00	0.00	0.00
A28	523	multi fuel	gasoline RVP 10	23,580,000	323	0.00	0.00	0.00	0.00	0.00	0.00	0.00
A29	544	multi fuel	gasoline RVP 10	27,720,000	2,675	139.10	24.07	2.67	42.80	34.77	21.40	13.37
A45	548	multi fuel	gasoline RVP 10	32,460,000	2,696	140.18	24.26	2.70	43.13	35.05	21.57	13.48
A46	549	multi fuel	gasoline RVP 10	32,460,000	2,696	140.18	24.26	2.70	43.13	35.05	21.57	13.48
A47	550	multi fuel	gasoline RVP 10	70,000,000	3,444	179.10	31.00	3.44	55.10	44.77	27.55	17.22
A48	551	multi fuel	gasoline	50,400,000	2,680	139.36	24.12	2.68	42.88	34.84	21.44	13.40

EU	Unit Number	Product	Emissions Based On	Annual Throughput Limitations (gal/yr)	PTE (pounds per year)							
					VOC	Total HAP	Benzene	Ethyl benzene	Hexane	Toluene	2,2,4-Trimethyl pentane	Xylenes
	Surge Tank											
G01	Tank	gasoline	gasoline RVP 10	25,000	20.00	1.00	0.18	0.02	0.32	0.002	0.0002	0.002
G02	Tank	Diesel	gasoline RVP 10	25,000	20.00	0.53	0.18	0.02	0.32	0.002	0.0002	0.002
H2	TBD	waste fuel	gasoline RVP 10	302,400	740	19.40	6.66	0.74	11.84	0.09	0.006	0.06
H3	TBD	waste fuel	gasoline RVP 10	806,400	2,080	54.51	18.72	2.08	33.28	0.24	0.02	0.17
H4	TBD	waste fuel	gasoline RVP 10	100,800	940	24.71	8.46	0.94	15.04	0.11	0.08	0.08
H6	Nellis Sump	waste fuel	gasoline RVP 10	75,600	20	0.52	0.18	0.02	0.32	0.002	0.0002	0.002
H7	Rack 6 sump	waste fuel	gasoline RVP 10	36,000	20	0.52	0.18	0.02	0.32	0.002	0.0002	0.002
H8	Quality control Lab sump	waste fuel	gasoline RVP 10	7,200	40	1.05	0.36	0.04	0.64	0.005	0.0003	0.003
H11	TBD	Oil water separator	gasoline RVP 10	15,768,000	160	4.20	1.44	0.16	2.56	0.02	0.002	0.01
H12	TBD	waste fuel/oil/water	gasoline RVP 10	365,000	60	1.57	0.54	0.06	0.96	0.007	0.0005	0.005
Total: Lbs/year					114,333	5,581.76	960.98	113.29	1,708.21	1,340.42	821.11	533.71
Total: Tons/year					57.16	2.79	0.48	0.05	0.77	0.67	0.41	0.27

Table IV-D-16: Fuel Additives Storage Tanks, Throughput Limits and PTE

EU	Facility Number/Identifier	Tank Type ¹	Annual Throughput		PTE (tons/year)
			barrels	gallons	VOC
A25	ASA	FR AST	160	5,040	0.01
A26	500A	FR AST	3,046	95,949	0.05
A30	533A	FR AST	3,046	95,949	0.05
A31	537A	FR AST	3,046	95,949	0.05
A32	541A	FR AST	4,700	148,050	0.12
A33	541B	FR AST	4,700	148,050	0.12
A34	LV 005	FR AST	2,578	81,207	0.09
A35	Amoco	FR AST	2,517	79,286	0.06
A36	Shell	FR AST	1,767	55,661	0.04
A37	Diesel Dye	FR AST	160	5,040	0.01
A38	537B	FR AST	3,046	95,949	0.08
A39	M-1	FR AST	1,400	44,100	0.03
A41	Additive A	FR AST	1,400	44,100	0.03
A42	Additive B	FR AST	1,400	44,100	0.03
A49	LV 006	FR AST	160	5,040	0.01
A53	Exxon 2	FR AST	1,826	57,519	0.04
A54	Texaco 1	FR AST	3,046	95,949	0.07
H10	500B	VFR AST	4,190	132,000	0.01
Totals			42,188	1,328,938	0.90

¹ 'FR' is a fixed roof tank, 'VFR' is a vertical fixed roof tank.

The emissions from the loading racks are from three sources, EU: B01, B02 and B10. The methodology used in the Modification 6 TSD, upon which the initial Title V permit calculations of PTE were based for EU: B10, did not include VOC or HAP emissions. The fugitive emissions from EU: B01 is assumed to account for the VOC and HAP emissions from EU: B10.

Table IV-D-17: EU: B01, Fugitive Emissions PTE from the Loading Rack

EU	Description	Pollutant	Throughput (gallons/yr)	VOC PTE (tons/year)	HAP PTE (tons/year)
B01	Loading Rack Fugitive Emissions	gasoline	977,278,302	62.04	2.90
		diesel	366,790,872	0.07	
		jet fuel	81,545,856	0.02	
		ethanol	51,307,116	0.32	
		transmix	7,174,440	0.32	
		additives	1,328,938	0.00	
Total			62.77	2.90	

Table IV-D-18: EU: B02, Vapor Recovery Unit Emissions PTE

EU	Description	Pollutant	VOC PTE ¹ (tons/year)	HAP PTE (tons/year)
B02	John Zinc Vapor Recovery Unit	gasoline	13.66	0.64
		diesel	0.01	
		jet fuel	0.00	
		ethanol	0.07	
		transmix	0.07	
		additives	0.00	
Total			13.82	0.64

¹ The PTE for VOC emissions are based on manufacturer's guaranteed emissions (LAER) of 2.4 mg VOC/l of product loaded (0.02 lbs/1,000 gallons) averaged over a 4 hr period.

Table IV-D-19: EU: B10 Auxiliary Flare Combustion Emissions PTE

EU	Description	Pollutant	PTE ¹ (tons/year)
B10	Flare Processing Unit	PM ₁₀	0.23
		NO _x	0.29
		CO	2.46
		SO _x	0.14
Total			3.12

¹ The VOC emission from the flare, EU: B10, are accounted for in the VOC emission from EU: B01

Table IV-D-20: Controlled PTE for EU: H9: Ethanol Unloading System (tons/year)

EU	Annual Throughput (gal/yr)	Description	CE ¹	PM10	NOX	CO	SOX	VOC ²	HAP
H9	76,104,000	Ethanol Unloading System	99%	0.00	0.00	0.00	0.00	0.18	0.00

¹ This tank will be connected to a carbon adsorption unit with a control efficiency of at least 99 percent.

² The PTE of EU: H9 is based on the amount of vapor remaining in the pipes and fitting after unloading of the ethanol and then combusted through the VRU, it is indirectly based on the throughput, For an explanation, see the Calneve spreadsheet in the source folder, submitted June 28, 2011.

Table IV-D-21: Annual PTE from Fittings (EU: B06)

Fitting Type	Number of Fittings	Emission Factors (lbs/unit-hr)	PTE
			tons/year
Pumps and seals in liquid service	54	0.00119	0.25
Valves (light liquid)	2,485	0.0000946	1.05
Valves (gas)	12	0.0000286	0.00147
Connectors (light liquid)	4,441	0.0000176	0.34
Connectors (gas)	31	0.0000925	0.0126

Fitting Type	Number of Fittings	Emission Factors (lbs/unit-hr)	PTE
			tons/year
Loading arm valves (gas service)	20	0.045	3.94
Loading arm valves (liquid service)	100	0.00087	0.39
Other	246	0.000286	0.31
Total VOC's:			6.30
Total HAP's:			0.30

Table IV-D-22: PTE for the Firepump EU: D02, Soil Remediation Unit EU: SR04 and Haul Roads EU: E01 and H01

EU	PTE	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
D02	lbs/hr	0.46	6.45	1.39	0.08	0.51	0.1
	tons/yr	0.03	0.39	0.08	0.01	0.03	0.01
SR04	lbs/hr	0.01	0.42	0.07	0.01	8.59	0.68
	tons/yr	0.06	1.84	0.31	0.01	37.62	2.93
E01							
	tons/yr ¹	6.56	0.00	0.00	0.00	0.00	0.00
H01	lbs/hr	0.34	0.00	0.00	0.00	0.00	0.00
	tons/yr	1.46	0.00	0.00	0.00	0.00	0.00

¹ The haul roads were calculated using 173.375 trucks per year on a 0.5 mile RT paved road with a control factor of 0.02

Table: IV-D-23: PTE from the Cooling Tower EU: H5

EU	Description	Drift Loss	Flow Rate	TDS (mg/l)	Operation		PM ₁₀ PTE	
			gal/min		hrs/day	hrs/yr	lbs/hr	tons/yr
H5	Baltimore Aircoil Cooling Tower	0.001%	220	1000	24	8,760	0.01	0.01

Table IV-D-24: PTE from Fuel Flow Meter Provers EU: P1 and P2

EU	Description	Volume (gal)	VOC EF (lbs/gal)	Services/Year	PTE			
					lbs/day		tons/year	
					VOC	HAP	VOC	HAP
P1	Nellis-Line Prover	942	0.01064	12	10.02	0.52	0.06	0.01
P2	Main-Line Prover	844	0.01064	12	8.98	0.47	0.05	0.01

Table IV-D-25: New Emission Unit Description

EU ¹	Description	Model No.	Serial No.
H13 ^N	35"W x 24"L x17"D R&D Fountain Industries Company Parts Washer Tub	55061 E200	n/a

¹ The 'N' superscript is a new emission unit.

With this Part 70 Title V permit renewal, the source PTE is the sum of the PTE of emission units unaffected by modifications and the NEI of issued ATC/OPs. The source PTE for the Part 70 Title V permit renewal is presented in Table IV-D-25.

Table IV-D-26: Source Total PTE

A.	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
Tons per year	8.35	2.52	2.85	0.16	183.93	10.33

E. Emission Limitations

General

1. The actual and allowable emissions during normal operations, from each emission unit shall not exceed the calculated potential to emit listed in Tables IV-D-15 through D-25.
2. At no time shall any air contaminants be released into the atmosphere for a period or periods aggregating more than three minutes in any 60 minute period, which is equal to or greater than 20 percent opacity.

Vapor Recovery Unit EU: B02

3. The emissions to the atmosphere from the vapor collection system, EU: B02 shall not exceed 2.4 milligrams of total organic compounds per liter of gasoline loaded (0.02 lbs/1,000 gallon of product loaded).

Provers EU: P1 and P2

4. The Fuel Flow Meter Provers (EU: P1 and P2) shall be limited to 12 service events per year and shall not exceed the service volumes listed in Table IV-D-24.

F. Monitoring and Compliance Assurance

General

1. A standard visual observation condition is utilized in the permit, which requires the source to conduct regular checks to establish whether the opacity limit(s) is being exceeded. An EPA Method 9 is being required if certain criteria are met.
2. This facility is subject to 40 CFR 60 Subpart A, K, Kb and XX, 40 CFR Part 80 and 40 CFR Part 63 Subpart BBBB and Subpart ZZZZ. It is Calnev's responsibility to know and follow all compliance requirements within these federal regulations.
3. Compliance with product storage limits, rack dispensing throughput limits, and Reid Vapor Pressure limits will constitute continued compliance with corresponding emission limits.
4. The requirement to report upset/breakdowns or malfunctions which cause excess emissions has been moved to the general conditions. This condition has been revised to allow a 24 hour response time, which is consistent with the current Section 25.

EU: B10; Auxiliary Flare

5. The Flare Industry flare unit EU: B10 shall be fitted with an optical scanner/sensor that will *continuously verify the presence of a flame while in operation*. If flame instability is detected by the scanner/sensor the flare unit shall be designed to immediately shut down operations.
6. The flare, EU: B10 shall be maintained and operated per manufacturer's specifications.
7. During the operation of the flare, EU: B10, the operator on duty will visually inspect the flame quality upon start up and once every two hours thereafter. The operator will document the date and time of each observation. If the flame is observed to be anything but clear blue, the operator will increase visual inspections and perform any corrective actions as dictated by the facility- operating manual.
8. The saturator tank fluid on EU: B10 will be tested monthly, and at the conclusion of any flare use in excess of 24 hours cumulative operation. The testing will consist of taking a representative sample from the saturator tank and analyzing the sample for API gravity and vapor pressure. The fluid must be replaced if the analysis determines the API gravity to be less than 47 degrees or if the analysis determines the Reid vapor pressure to be less than four psia.

Diesel Firepump

9. The Permittee shall operate the fire pump (EU: D02) with a nonresettable hour meter and monitor the duration of operation for testing and maintenance, and separately for emergencies. This condition was added to the permit to make the operating limitation practically enforceable.

EU: H5 Cooling Tower

10. The Permittee shall monitor the cooling tower by sampling and recording the TDS content of the circulation water monthly using a conductivity meter. (EU: H5).

Loading Racks / EU: B02

11. The JZVRU, EU: B02 shall be maintained and operated per manufacturer's specifications.
12. At least once per day, Calnev personnel will inspect all loading lanes and review all normal operations. The loading lane inspections will include but not be limited to inspecting all check valves, flanges, hoses, and loading arms. Review of all normal operations will include a facility walk through. Detection methods incorporating sight, sound, or smell are acceptable. A detection of a leak shall be recorded and the source of the leak repaired within five calendar days after it is detected.
13. Delay of repair of any leaking equipment will be allowed upon a demonstration to the Compliance Reporting Supervisor that repairs within five days are not feasible. Calnev shall provide the reason(s) a delay is needed and the date by which each repair is expected to be completed.
14. Calnev shall perform the preventative daily, weekly, quarterly, and annual maintenance protocols in accordance with John Zink Company guidelines.
15. Compliance with emission limitations of the JZVRU, EU: B02 exhaust stack shall be demonstrated with CEMS as follows:

tightness certificate, which will then be entered into the data system. If the driver does not have an updated vapor tightness certificate, the truck cannot load until a new certificate can be presented.

Soil Remediation Unit; EU: SR04

18. To aid in demonstrating continued direct compliance with operational limitations and the hourly and annual emissions limitations for VOC as specified in this permit, a continuous combustion chamber temperature monitor and a continuous flow monitor shall be installed on EU: SR04 to monitor and record the following parameters:
 - a. hours of operation;
 - b. exhaust gas flow rate;
 - c. continuous combustion chamber temperature; and
 - d. hourly and quarterly accumulated mass emissions of VOC. Hourly mass emission rates shall be calculated based on daily activities and monitoring data.
 - e. A continuous flow monitor shall be installed on EU: SR04.
19. Photoionization detector (PID) monitoring shall be performed weekly to determine the quantity of VOC sent to the control devices, the emissions to the atmosphere after the control devices and the destruction efficiency of the control devices.
20. Air samples shall be collected every two months to determine the quantity of VOC/HAP sent to the control devices and the emissions to the atmosphere. The samples shall be analyzed, at minimum, for total petroleum hydrocarbons (TPH) by EPA Method 8015M (as modified for air use) and for benzene, toluene, ethylbenzene and meta, para, ortho-xylene and methyl tert-butyl ether (MTBE) by Method 8260 (as modified for air use) and for water vapor content.
21. The PID unit shall be maintained according to the manufacturer's recommendations for calibration and quality control.
22. At minimum, the total flow rate (scfm) of the vapor stream to the control device shall be monitored and recorded with each sample collected
23. A visual inspection of EU: SR04 will be conducted daily for smoke. If the unit exhibits black or white smoke at any time, the unit is to be shut down until the cause is determined and repaired.
24. Excluding start-up or shut-down periods, any exceedance of the hourly or annual VOC emissions limitations expressed in Section IV-D shall be considered a violation of the emission limit imposed and may result in enforcement action.
25. Performance testing shall be used to initially determine compliance for the remediation equipment, EU: SR04.

EU: H10 and H11

26. A Photoionization Detector (PID) shall be used to measure the VOC concentration at the inlet and outlet of the control device. The control efficiency of the carbon absorber shall be calculated as equal to one (1) minus the VOC outlet concentration measured by the PID or FID divided by the VOC inlet concentration measured by the PID (EU: H11 and H12).
27. The PID shall be maintained and calibrated according to the manufacturer's recommendations (EU: H11 and H12).

28. The VOC concentration shall be measured weekly at the inlet and outlet of the carbon absorber system to verify control efficiency (EU: H11 and H12).

Parts Washer: EU: H13

29. The Permittee shall conduct a weekly visual leak checks while the emission unit, EU: H13, is in operation and while not in operation.

G. Performance Testing

The facility is subject to 40 CFR Part 60 Subparts A, K, Kb, XX 40 CFR Part 80 and 40 CFR Part 63 Subpart BBBBBB and is subject to the performance testing requirements of these subparts and DAQEM performance testing guidelines.

EU: B02 JVRU

The JZVRU is subject to 40 CFR Part 60 Subpart XX §60.503. The performance testing requirements are detailed in the permit and outlined in Table V-G-1.

Table IV-G-1: Performance Testing for EU: B02

Test Criteria	EPA Test Method
Stack parameters	Methods 1 through 4
Pre-test leak check	Method 21
Combustion vapor processing system	Method 2B
All other vapor processing systems	Method 2A
Determination of total organic compound concentrations	Method 25A or 25B or 18

Soil and Groundwater Remediation System, EU: SR04

The EU: SR04 is subject to performance testing requirements that are detailed in the permit. The methods are listed in Table V-G-2.

Table IV-G-2: Performance Testing for EU: SR04

Test Criteria	EPA Test Method
Stack parameters	Methods 1 through 4
Determination of total organic compound concentrations	Method 25A or 25B or 18

H. Record Keeping

All records and logs required by this Title V permit shall be kept by the Calnev Facility and made available to DAQEM for inspection during regular business hours. All records, logs, etc., or a copy thereof, shall be kept by the Calnev Facility on site for a minimum of five years from the date the measurement or data was entered. (Note that the record keeping requirements for NSPS units is two years per 40 CFR Part 60). For the Calnev Facility, various records, logs, etc., shall contain, at a minimum, the following information:

- excess emissions,
- notifications,

- malfunctions,
- record keeping,
- reporting requirements etc. as required by 40 CFR Part 60.1-17, 40 CFR Part 60.110-60.113, 40 CFR Part 60.110b-60.117b, and 40 CFR Part 60.500-60.506, and all related and relevant provisions therein

I. Reporting

The Calnev facility shall provide semi-annual reports and an annual emissions inventory report to demonstrate compliance with the Title V reporting requirements. The facility is subject to the requirements of 40 CFR 60.7. The facility will submit any reports required by 40 CFR 60.7 to both EPA Region IX and DAQEM. Additionally, DAQEM shall submit a copy of Calnev’s quarterly and annual reports to the Administrator of Region IX, EPA. The Calnev Facility will adhere to the reporting conditions of 40 CFR Part 60.1-17, 40 CFR Part 60.110-60.113, 40 CFR Part 60.110b-60.117b, and 40 CFR Part 60.500-60.506, and all related or relevant provisions therein. A quarterly summary of activities at this facility shall be submitted to the Compliance Reporting Supervisor, DAQEM, no later than 30 days after the end of each calendar quarter. Each annual report shall be based on the previous calendar year. Annual reports shall be submitted to the Compliance Reporting Supervisor, DAQEM, not later than January 30 of each calendar year.

The annual emissions inventory shall be submitted by March 31 to the Compliance Reporting Supervisor and shall include the emission factors and calculations used to determine the emissions from each permitted emission unit. The schedule for the submittal of reports to the DAQEM Compliance Reporting Supervisor is shown in Table IV-I-1.

Table IV-I-1: Reporting Schedule

Required Report	Applicable Period	Due Date ¹
Semi-annual Report for 1st Six-Month Period	January, February, March, April, May, June	July 30 each year
Semi-annual Report for 2 nd Six-Month Period, Any additional annual records required.	July, August, September, October, November, December	January 30 each year
Annual Compliance Certification Report	Calendar Year	January 30 each year
Annual Emission Inventory Report	Calendar Year	March 31 each year
Excess Emission Notification	As Required	Within 24 hours of the onset of the event

Required Report	Applicable Period	Due Date ¹
Excess Emission Report	As Required	Within 72 hours of the notification
Deviation Report	As Required	Along with semi-annual reports
Performance Testing	As Required	Within 60 days from the end of the test.

¹If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal are due on the next regularly scheduled business day.

Upset/breakdowns or emergencies, as defined in Section 0, shall be reported to the Control Officer within one hour of the onset of the upset/breakdown.

J. Continuous Emissions Monitoring

The source has installed on the JZVRU, EU: B02 a Continuous Emissions Monitoring (CEMS) device that demonstrates compliance with the allowable emissions for VOC's. The CEMs monitors the exhaust gas flow rate, hourly VOC concentrations in pounds per 1,000 gallon and milligrams per liter of fuel loaded, the four hour average VOC concentration in pounds per 1,000 gallon and milligrams per liter of fuel loaded and the amount of product dispensed in gallons and liters. This CEMs complies with the provisions of 40 CFR §63.13 and 40 CFR Part 63 Subpart BBBBBB §63.11092(b)(1)(i)(A).

V. REGULATORY REVIEW

A. Local Regulatory Requirements

DAQM has determined that the following public law, statutes and associated regulations, ordered by hierarchical authority, are requirements:

1. Clean Air Act, as amended (CAAA), Authority: 42 U.S.C. § 7401, et seq.;
2. Title 40 of the Code of Federal Regulations (CFR), including Part 70 and others;
3. Nevada Revised Statutes (NRS), Chapter 445, Sections 401 through 601;
4. Portions of the AQR that are included in the State Implementation Plan (SIP), for Clark County, Nevada. SIP requirements are federally enforceable. All requirements from Authority to Construct permits and Section 16 Operating Permits issued by DAQM are federally enforceable since these permits were issued pursuant to SIP-included sections of the AQR; and
5. Portions of the AQR that are not included in the SIP. These requirements are locally enforceable only.

The NRS and the CAAA are public laws that establish the general authority for the Regulations mentioned.

The DAQEM Part 70 (Title V) Program received Final Approval on November 30, 2001 with publication of that approval appearing in the Federal Register December 5, 2001

Vol. 66, No. 234. AQR Section 19 - Part 70 OP details the Clark County Part 70 OP Program. AQR Section 19 was repealed on July 1, 2010, replaced at the same time with AQR Section 12.5. These regulations may be accessed on the Internet at: <http://www.accessclarkcounty.com/depts/dagem/aq/rules/pages/regs.aspx>

Local regulations contain sections that are federally enforceable and sections that are locally enforceable only. Locally enforceable only rules have not been approved by EPA for inclusion into the SIP. Requirements and conditions that appear in the Part 70 OP which are related only to non-SIP rules are notated as locally enforceable only.

AQR SECTION 0 – DEFINITIONS [Amended 07/01/2010]

Discussion: Kinder Morgan is a major source of VOC. As part of the original New Source Review Analysis these emissions triggered notice of proposed action.

Table V-A-1: Clark County DAQEM – Air Quality and State Implementation Plan with Source Compliance or Requirement

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit	Compliance Method
0. Definitions	applicable definitions	no	entire facility	record keeping
1. Definitions	applicable definitions	yes	entire facility	record keeping
4. Control Officer	all subsections	yes	entire facility	record keeping
5. Interference with Control Officer	all subsections	yes	entire facility	record keeping
8. Persons Liable for Penalties - Punishment: Defense	all subsections	yes	entire facility	record keeping
9. Civil Penalties	all subsections	yes	entire facility	record keeping
10. Compliance Schedule	when applicable; applicable subsections	yes	entire facility	record keeping
11. Ambient Air Quality Standards	applicable subsections	yes	entire facility	record keeping

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit	Compliance Method
12. Preconstruction Review for New or Modified Stationary Sources	§ 12.1 General Application Requirements for New and Modified Sources of Air Pollutants. § 12.2.1 Requirements for PM ₁₀ Sources in the Nonattainment Area. § 12.2.7 Requirements for CO Sources in the Nonattainment Area. § 12.2.12 Requirements for VOC Sources in the management area. § 12.2.14 Requirements for NO _x Sources in the management Area. § 12.2.18 HAP Sources in Clark County § 12.3 Owner/Operator Notification, Application Processing Deadlines, Notice of Proposed Action Procedures, and Public Hearings. § 12.8 Issuance of Authority to Construct Certificate with conditions.	no	entire facility	record keeping performance testing reporting
16. Operating Permits	all subsections	yes	entire facility	record keeping
18. Permit and Technical Service Fees	§ 18.1 Operating Permit Fees. § 18.2 Annual Emission Unit Fees. § 18.4 New Source Review Application Review Fee. § 18.5 Part 70 Application Review Fee. § 18.6 Annual Part 70 Emission Fee. § 18.14 Billing Procedures	yes	entire facility	record keeping
24. Sampling and Testing - Records and Reports	§ 24.1 Requirements for installation and maintenance of sampling and testing facilities. § 24.2 Requirements for emissions recordkeeping. § 24.3 Requirements for the record format. § 24.4 Requirements for the retention of records by the emission sources.	yes	entire facility	record keeping reporting

Applicable Section – Title	Applicable Subsection - Title	SIP	Affected Emission Unit	Compliance Method
25.1 Upset/Breakdown, Malfunctions	§ 25.1 Requirements for the excess emissions caused by upset/breakdown and malfunctions.	no	entire facility	record keeping reporting
25.2 Upset/Breakdown, Malfunctions	§ 25.2 Reporting and Consultation.	yes	entire facility	record keeping reporting
29.3.1 Sulfur Contents of Fuel Oil	§ 29.3.1 Allowance for analytical variations in sulfur content of fuel oil.	yes	entire facility	record keeping and reporting
26. Emission of Visible Air Contaminants	§ 26.1 Limit on opacity ($\leq 20\%$ for 3 minutes in a 60 minute period)	yes	entire facility	record keeping Method 9 (EPA)
40. Prohibitions of Nuisance Conditions	§ 40.1 Prohibitions	no	entire facility	record keeping
41. Fugitive Dust	All sections	yes	entire facility	record keeping
42. Open Burning	§ 42.1 Burning of Combustibles § 42.4 Open burning	yes	entire facility	record keeping
43. Odors In the Ambient Air	§ 43.1 Prohibitions	yes	entire facility	record keeping
60. Evaporation and Leakage	all subsections	yes	entire facility	record keeping
70. Emergency Procedures	all subsections	yes	entire facility	record keeping
80. Circumvention	all subsections	yes	entire facility	record keeping
90. Fugitive Dust, Open Areas and Vacant Lots	all applicable subsections	no	entire facility	record keeping and records
91. Fugitive Dust, Unpaved Roads, Unpaved Alleys and Unpaved Easement Roads	all applicable subsections	no	entire facility	record keeping and records
92. Fugitive Dust, Unpaved Parking Lots	all applicable subsections	no	entire facility	record keeping and records
93. Fugitive Dust, Paved Roads and Street Sweeping Equipment	all applicable subsections	no	entire facility	record keeping and records
94. Permitting and Dust Control for Construction Activities	all applicable subsections	no	entire facility	record keeping and records

AQR SECTION 11 - AMBIENT AIR QUALITY STANDARDS *(in part)*

The source was modeled in Modification 18. The results are presented in Table V-A-2.

Table V-A-2: Modification 18 Increment Consumption

Pollutant	Averaging Period	PSD Consumption ($\mu\text{g}/\text{m}^3$)	Location of Maximum Impact	
			UTM X	UTM Y
SO ₂	3 hour	29.26 ¹	675864	4013522
SO ₂	24 hour	12.80 ¹	675859	4013618
SO ₂	Annual	4.36	675859	4013618

NO _x	annual	0.33	675859	4013618
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¹ Modeled second highest concentration

B. Federally Applicable Regulations

40 CFR PART 60-STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES (NSPS).

Calnev is subject to 40 CFR 60 Subparts A, K, Kb, and XX. The subsequent subsections detail the applicable subparts and relevant, but currently non-applicable subparts.

Subpart A - General Provisions

40 CFR 60.7 – Notification and record keeping

Discussion: This regulation requires notification to DAQEM of modifications, opacity testing, records of malfunctions of process equipment and/or continuous monitoring device, CEMS data, and performance test data. These requirements are found in the Part 70 OP. These requirements are found in the Part 70 OP. DAQEM requires records to be maintained for five years, a more stringent requirement than the two years required by 40 CFR 60.7.

40 CFR 60.8 – Performance tests

Discussion: Performance tests requirements are found in the Part 70 OP in Section III-D. Notice of intent to test, the applicable test methods, acceptable test method operating conditions and the requirement for three runs are outlined in this regulation. [Part 60] DAQEM requirements for initial performance testing are identical to §60.8. DAQEM also requires periodic performance testing on emission units based upon throughput or usage and the lack of other compliance demonstration methods. Performance testing is discussed in this document in Section IV-G. Additional discussion is in this document under the compliance section.

40 CFR 60.11 – Compliance with standards and maintenance requirements

Discussion: Compliance with various applicable standards will be demonstrated by performance tests unless otherwise specified in the standard. AQR Section 26 is more stringent than the federal opacity standards, setting a maximum of 20 percent opacity in any three minute period. Section 26.1 does include (c) above as an exception to the more stringent local rule. Calnev shall operate in a manner consistent with this section of the regulation.

40 CFR 60.12 – Circumvention

Discussion: This prohibition is addressed in the Part 70 OP. This is also local rule AQR 80.1.

40 CFR 60.13 – Monitoring requirements

Discussion: This section requires that CEMS meet 40 CFR 75 Appendix B and 40 CFR 60 Appendix F standards of operation, testing and performance criteria. The Part 70 OP contains the CEMS conditions and citations to 40 CFR 75 Appendix B and 40 CFR 60 Appendix F. In addition, the quality assurance plan approved for the CEMS follows the requirements outlined including span time and recording time. Section III-G of the Part 70 permit specifically contains these performance conditions.

Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids

40 CFR 60.110 – Applicability and designation of affected facility.

Discussion: Subpart K applies to all petroleum storage vessels constructed, reconstructed or modified between June 11, 1973 and prior to May 189, 1978 that exceed a storage capacity of 40,000 gallons and store a product with an RVP between 1.5 psia and 11.1 psia. Subpart K is applicable to the following tanks: A01 through A12, and A29.

40 CFR 60.112 – Standard for volatile organic compounds (VOC).

Discussion: The applicable tanks are subject to the VOC standard and are each equipped with a floating roof to comply with this requirement.

40 CFR 60.113 – Monitoring of operations.

Discussion: Calnev maintains records for these tanks pursuant to 60.113.

Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels

40 CFR 60.110b – Applicability and designation of affected facility.

Discussion: All storage vessels that contain a VOC emitting product that have been constructed, reconstructed, or modified after July 23, 1984, with a capacity equal to or greater than 75 cubic meters (19,813 gallons) but less than 151 cubic meters (39,890 gallons) and a true vapor pressure greater than 2.18 psi, or petroleum storage vessels greater than 151 cubic meters (39,890 gallons) with a true vapor pressure greater than 0.51 psi, are subject to the requirements of Subpart Kb. EU: A13, A16, A17, A18, A21, A28, A45 through A48, A58 through A61, B04 and B05 meet these applicability criteria and are therefore subject to the requirements of Subpart Kb.

EU A26, A30 through A34, and A38 were all subject to the record keeping requirement of Subpart Kb. However, pursuant to the final rule promulgated on October 15, 2003, by the EPA, amendments to Subpart Kb, this record keeping requirement is no longer applicable. Therefore storage vessels A26, A30 through A34, and A38 are exempt from Subpart Kb.

40 CFR 60.112b – Standard for volatile organic compounds (VOC).

Discussion: The applicable tanks are subject to the VOC standard and are each equipped with a fixed roof, external floating roof, or closed vent system to comply with this requirement.

40 CFR 60.113b – Testing and procedures.

Discussion: The applicable tanks shall be tested to verify compliance with the requirements of paragraph (a), (b), or (c) of § 60.113b. The applicable paragraph for a particular storage vessel depends on the control equipment installed to meet the requirements of § 60.112b. These requirements are found in the Part 70 OP.

40 CFR 60.115b – Reporting and recordkeeping requirements.

Discussion: Calnev shall keep records and furnish reports as required by paragraphs (a), (b), or (c) of §60.115b for each applicable storage vessel depending upon the control equipment installed. Calnev shall keep copies of all reports and records required by this section, except for the record required by (c)(1), for at least 2 years. The record required by (c)(1) will be kept for the life of the control equipment. Specific record keeping and reporting requirements are identified in the Part 70 OP.

Subpart XX – Standards of Performance for Bulk Terminals

40 CFR 60.500 – Applicability and designation of affected facility.

Discussion: This NSPS is applicable to any bulk gasoline facility that has loading racks for the delivery of liquid product to commercial gasoline tank trucks that were constructed or modified after December 17, 1980. Since Calnev modified its loading racks in 1998, Subpart XX applies to unit B01.

40 CFR 60.502 – Standard for Volatile Organic Compound (VOC) emissions from bulk gasoline terminals.

Discussion: Pursuant to 60.502 (a) Calnev's bulk terminals must be equipped with a vapor collection system (EU: B02) designed to collect VOC vapors displaced from tank trucks during loading. The vapor collection system shall not exceed the emissions limitation of 35 milligrams of VOCs per liter of gasoline loaded. The guaranteed emission limitation for EU: B02 by the manufacturer to meet the LAER requirements is 2.4 mg/l (0.02 lbs/1,000 gallons of gasoline loaded) which is more stringent than the Subpart XX standard.

Pursuant to 60.502 (e) loading of liquid product into gasoline tank trucks shall be limited to vapor tight tank trucks with the proper vapor tightness documentation.

40 CFR 60.503 – Test methods and procedures.

Discussion: Calnev is subject to the testing methods contained in 60.503 and the reporting and record keeping requirements of 60.505 (performance test

reporting, leak inspections logs). These requirements are found in the Part 70 OP.

40 CFR 60.505 – Reporting and Record Keeping.

Discussion: Calnev is subject to the reporting and record keeping requirements of 60.505 (performance test reporting, leak inspections logs). Specific record keeping and reporting requirements are identified in the Part 70 OP.

40 CFR 80 – Regulation of Fuels and Fuel Additives

40 CFR 80. 1 – Scope

Discussion: Calnev is subject to all of the applicable provisions of 40 CFR 80.

40 CFR 63.43 – Maximum Available Control Technology (MACT)

Discussion: The following HAPs are emitted at Calnev

1. Benzene
2. Ethylbenzene
3. Hexane
4. Toluene
5. 2,2,4-Trimethylpentane
6. Xylenes

A MACT analysis is not, at the present time, applicable to Calnev, because it is not permitted to emit more than ten tons per year of any hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.

40 CFR Part 63 Subpart BBBB: National Emission Standards for Hazardous Air Pollutants for Source Category: gasoline Distribution Bulk Terminal, Bulk Plants and Pipelines Facilities

40 CFR 63.11081 – Applicability and designation of affected facility.

Discussion: The source is a bulk gasoline terminal as defined in § 63.11100 and meets the definition of §63.11081(a)(1) and is therefore subject to this Subpart.

The gasoline storage tanks, loading racks and equipment components that are subject to Subpart BBBB are listed in Table V-B-1.

Table V-B-1: Emission Units in Gasoline Service Subject to 40 CFR Part 63 Subpart BBBB.

EU	Equipment	Description	Tank Capacity (bbbls)
A01	Tank 530	External floating roof w/primary and secondary seals	11,200
A02	Tank 531	External floating roof w/primary and secondary seals	12,890
A03	Tank 532	External floating roof w/primary and secondary seals	8,080

EU	Equipment	Description	Tank Capacity (bbls)
A04	Tank 533	External floating roof w/primary and secondary seals	11,330
A05	Tank 534	External floating roof w/primary and secondary seals	8,080
A06	Tank 535	External floating roof w/primary and secondary seals	8,080
A07	Tank 536	External floating roof w/primary and secondary seals	17,550
A08	Tank 537	External floating roof w/primary and secondary seals	22,250
A09	Tank 538	External floating roof w/primary and secondary seals	11,330
A10	Tank 539	External floating roof w/primary and secondary seals	11,330
A11	Tank 540	Internal floating roof w/primary and secondary seals	16,320
A12	Tank 541	External floating roof w/primary and secondary seals	25,100
A13	Tank 524	Internal floating roof w/primary and secondary seals	18,000
A16	Tank 545	Internal floating roof w/primary and secondary seals	37,000
A17	Tank 546	Internal floating roof w/primary and secondary seals	40,000
A21	Tank 547	Internal floating roof w/primary and secondary seals	50,000
A28	Tank 523	Internal floating roof w/primary and secondary seals	10,000
A29	Tank 544	Internal floating roof w/primary and secondary seals	11,000
A45	Tank 548	Domed external floating roof w/primary and secondary seals	119
A46	Tank 549	Domed external floating roof w/primary and secondary seals	12,890
A47	Tank 550	Internal floating roof w/primary and secondary seals	12,890
A48	Tank 551	Internal floating roof w/primary and secondary seals	20,000
A58	Tank 553	Internal floating roof w/primary and secondary seals	80,000
A59	Tank 554	Internal floating roof w/primary and secondary seals	80,000
A60	Tank 555	Internal floating roof w/primary and secondary seals	80,000
A61	Tank 552	Internal floating roof w/primary and secondary seals	40,000
B01	Loading lanes fugitive emissions	Miscellaneous losses/leaks-loading racks	n/a
B02	John Zink VRU	Vapor control unit, loading lanes	n/a
B04	Tank 500	Internal floating roof w/primary and secondary seals	3,000
B05	Tank 521	Internal floating roof w/primary and secondary seals	5,000
B06	Piping and fittings throughout the facility	Misc. losses/leaks-valves,flanges,pumps and VCU	n/a
B10	Flare processing unit	Vapor control unit loading lanes-includes saturator and vapor holding tank	n/a
G02	Tanks refueling	Fixed roof 250 gallons gasoline	5.9
A29	Tank 544	Internal floating roof AST w/primary and secondary seal	11,000

40 CFR 63.11083 – Compliance Date

Discussion: Kinder Morgan is an existing affected source and shall comply with all requirements of this subpart according to § 63.11083(b) by January 10, 2011. A letter dated April 30, 2008 submitted by Kinder Morgan to DAQEM indicated that Kinder Morgan was at that time, in compliance with 40 CFR Part 63 Subpart BBBBBB. Kinder Morgan stated that a Notification of Compliance Status with detailed equipment description, relevant standards and compliance date will be submitted to EPA Region 9 prior to January 10, 2011.

40 CFR 63.11086 – Compliance requirements for bulk gasoline plants

Discussion: Kinder Morgan is not a bulk gasoline plant as defined in § 63.11086 and will not be subject to the requirements of this section.

40 CFR 63.11087 – Compliance requirements for bulk gasoline terminals, pipeline breakout stations, and pipeline pumping stations

Discussion: Kinder Morgan submitted an Initial Notification for Gasoline Distribution Facilities as required by 40 CFR Part 63 Subpart BBBBBB §63.11093(a) to DAQEM and EPA Region 9 on April 30, 2008, that specified that all tanks and equipment subject to Subpart BBBBBB were in compliance with the emission limits and management practices as specified in Table 1 to Subpart BBBBBB.

40 CFR 63.11088 – Compliance requirements for gasoline loading racks at a bulk gasoline terminal, pipeline breakout station, or pipeline pumping station facility

Discussion: Kinder Morgan submitted an Initial Notification for Gasoline Distribution Facilities as required by 40 CFR Part 63 Subpart BBBBBB §63.11093(a) to DAQEM and EPA Region 9 on April 30, 2008 that specified that the loading racks subject to Subpart BBBBBB were in compliance with the emission limits and management practices as specified in Table 2 to Subpart BBBBBB.

Specifically, Table 2 of Subpart BBBBBB, Table section 1(a) requires a vapor collections system designed to collect the TOC vapors displaced from cargo tanks during product loading. This requirement is met by EU: B02 and B10.

Table 2 of Subpart BBBBBB, Table section 1(b) requires reducing the VOC emissions from the loading racks to equal or less than 80 mg/l of product loaded. The permitted conditions currently have emission limitation for the VRU, EU: B02 at 2.4 mg/l and the flare, EU: B10 at 10.0 mg/l of product loaded. The permitted conditions are stricter than the federal limits.

Table 2 of Subpart BBBBBB, Table section 1(c) requires that the design and operation of the vapor collection system prevents any TOC vapors collected at one loading rack from passing to another loading rack; this is satisfied by the

Notification for Gasoline Distribution Facilities as required by 40 CFR Part 63 Subpart BBBBBB §63.11093(a) to DAQEM and EPA Region 9 on April 30, 2008, that specified that the loading racks subject to Subpart BBBBBB were in compliance with the emission limits and management practices as specified in Table 2 to Subpart BBBBBB.

Table 2 of Subpart BBBBBB, Table section 1(d) states that a source must limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in §60.502(e) through (j), this requirement is a condition in the Title V permit under ‘Control Technology Requirements’.

40 CFR 63.11089 – Compliance requirements for equipment leak inspections if my facility is a bulk gasoline terminal, bulk plant, pipeline breakout station, or pipeline pumping station?

Discussion: The requirements of this section of Subpart BBBBBB have been included in the monitoring and record keeping sections of the Title V renewal permit.

The source complied with the initial notification required by §63.11093 in a letter dated April 30, 2008 sent to DAQEM.

40 CFR 63.11092 – Testing and Monitoring Requirements

Discussion: Calnev is subject to this section and the requirements of this section have been included in the Part 70 OP.

40 CFR 63.11093 – Notifications, Records, and Reports

Discussion: Kinder Morgan submitted a Notification of Compliance as specified in §63.9(b) to DAQEM on April 30, 2008.

40 CFR 63.11094 – Recordkeeping requirements

Discussion: The requirements of §63.11094 are included in the record keeping section of the Title V Renewal.

40 CFR 63.11095 – Reporting requirements

Discussion: The requirements of §63.11095 are included in the reporting section of the Title V renewal.

40 CFR Part 63 Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

40 CFR 63.6590 – Applicability

Discussion: Pursuant to § 63.6590(b)(3)(vii), EU: D02, does not have to meet the requirements of Subpart ZZZZ and of Subpart A, including initial notification, of Part 63 because the affected source, EU:D02 is an existing commercial¹ emergency RICE

¹from EPA Memorandum, August 9, 2010 EPA Docket EPA-HQ-OAR-2008-0708, the source has a NAICS Code of 424710

40 CFR 64 – COMPLIANCE ASSURANCE MONITORING (CAM)

40 CFR 64.2 – Applicability

Discussion: Calnev is not presently subject to CAM because the initial permit application was filed on February 14, 1996, which is prior to the April 20, 1998 filing requirement of §64.5 (a).

VI. COMPLIANCE

A. Compliance Certification

19.3.3.9 Requirements for compliance certification:

1. Regardless of the date of issuance of this Part 70 Operating Permit, the schedule for the submittal of reports to the DAQEM Control Officer shall be as follows:

Table VI-A-1: Report Schedule

Required Report	Applicable Period	Due Date ¹
Semi-annual Report for 1st Six-Month Period	January, February, March, April, May, June	July 30 each year
Semi-annual Report for 2 nd Six-Month Period, Any additional annual records required.	July, August, September, October, November, December	January 30 each year
Annual Compliance Certification Report	12 Months	30 days after the Operating Permit issuance anniversary date.
Annual Emission Inventory Report	Calendar Year	March 31 each year
Excess Emission Notification	As Required	Within 24 hours of the onset of the event
Excess Emission Report	As Required	Within 72 hours of the notification
Deviation Report	As Required	Along with semi-annual reports
Performance Testing	As Required	Within 60 days from the end of the test.

¹ Each report shall be received by DAQEM on or before the due date listed. If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal is due on the next regularly scheduled business day.

2. A statement of methods used for determining compliance, including a description of monitoring, recordkeeping, and reporting requirements and test methods.
3. A schedule for submission of compliance certifications during the permit term.
4. A statement indicating the source's compliance status with any applicable enhanced monitoring and compliance certification requirements of the Act.

B. Compliance Plan

Listed in Table VI-B-1 below are the compliance requirements of this source.

Table VI-B-1: Compliance Requirements

Regulation	Requirement/Standard	Affected EU	Record Generation	Reporting Frequency	Location of Records
60.115b	report to Administrator after installation of control equipment and keep records for 2 years	All AST	with installation	per APCD requirement	Colton and/or Orange
60.505	tank truck vapor tightness documentation	haul trucks	available onsite	annual	terminal
60.116b	Part 60 Subpart Kb	EU: A08, A10, A11, A16, A17, A21, A27, B04 and B05	with installation	per APCD requirement	terminal
APCD issued permit	maintenance log, daily throughputs for facility, inspection log for JZVRU, EU: B02 including process T,P and flow	Loading racks and EU: B02	daily	per APCD requirement	terminal
60.18(c)(1)	flare with no visible emissions per Method 22	EU: B10	per APCD request	per APCD requirement	terminal
60.112b	IFR with double seal system on AST	Tanks: 501,522,524 ,527,545,54 6,547,548,5 49,544,523, 550,551,553 ,554,555,55 2,500,521	per APCD request	per APCD requirement	terminal
60.502	vapor collection system for fuel vapors displaced during tanker loading	Loading racks			terminal
	emissions from vapor collection less than 35 mg per liter of gasoline loaded	EU: B02	9/14/1994	per APCD requirement	terminal
	vapor transfer from rack to rack	loading racks		all lanes have check valves	terminal

Regulation	Requirement/Standard	Affected EU	Record Generation	Reporting Frequency	Location of Records
	load only to state certified vapor tight trucks	existing system	required for each truck		terminal
	unleaded gasoline meets 80.2(g) standard			routine	terminal
	Reid Vapor pressure May 1 through September 15			routine	terminal
	diesel dye is not 1,4 diaklylaminoanthroquine, cetane not greater than 40 and has less than 0.05% sulfur content			routine	terminal
APCD issued permit	throughput cap of 35,379,927 bbl/year and 5,200,000 gal/day with a calculated PTE of 76.6 tpy	loading racks and EU: B02	9/14/1994	per APCD requirement	Colton and/or Orange
60.8	Performance test of control system	EU: B02	per APCD requirement	per APCD requirement	Colton and/or Orange
60.113b	inspection of IFR	Tanks:500,501,521,522,545,546,547,548,549,523,550,551,552,553,554,555	annual	routine	terminal
80.3	lead and phosphorus content of gasoline	gasoline	by refiner	routine	Colton and/or Orange
80.4	entry rights for agency inspector	terminal		agency personnel	
40 CFR Part 63 Subpart ZZZZ 63.6605	Operate and maintain the RICE, EU: D02 in a manner consistent with safety and good air pollution control practices for minimizing emissions	Fire pump engine, EU: D02	Permitte	Annual	On site

C. Compliance Summary

Table IV-C-1: Compliance Summary Table – AQR

Citation	Title	Applicability	Applicable Test Method	Compliance Status
AQR Section 0	Definitions	Applicable – KINDER MORGAN will comply with all applicable definitions as they apply.	KINDER MORGAN will meet all applicable test methods should new definitions apply.	KINDER MORGAN complies with applicable requirements.
AQR Section 4	Control Officer	Applicable – The Control Officer or his representative may enter into KINDER MORGAN property, with or without prior notice, at any reasonable time for purpose of establishing compliance.	KINDER MORGAN will allow the Control Officer to enter KINDER MORGAN property as required.	KINDER MORGAN complies with applicable requirements.
AQR Section 11	Ambient Air Quality Standards	Applicable – KINDER MORGAN is a source of air pollutants.	EPA-approved dispersion modeling.	KINDER MORGAN complies with applicable requirements
AQR Section 12.1	General application requirements for construction of new and modified sources of air pollution	Applicable – KINDER MORGAN applied for and the ATC certificates were issued commencing construction of applicable emission units.	KINDER MORGAN has received all required ATC permits to construct.	KINDER MORGAN currently complies with applicable requirements.
AQR Section 12.5 (07/01/2010)	Part 70 Operating Permit Requirements	Applicable – KINDER MORGAN is a major stationary source and under 40 CFR 70 the initial Title V permit application was submitted as required. Renewal applications are due between 6 and 18 months prior to expiration. Revision applications will be submitted within 12 months or commencing operation of any new emission unit.	KINDER MORGAN will submit renewal applications between 6 and 18 months prior to expiration and revision applications within 12 months of commencing operation of any new emission unit.	KINDER MORGAN complies with applicable requirements.
AQR Section 12.2.16	Requirements for specific air pollutants: SO ₂ sources located in the PSD area	Applicable – KINDER MORGAN has SO ₂ emission units located in Hydrographic Basin 212, which is PSD for SO ₂ .	The KINDER MORGAN SO ₂ controls meet BACT as applicable for Hydrographic Basin 212. The Part 70 permit has relevant compliance, record keeping and reporting requirements.	KINDER MORGAN complies with applicable control technology requirements and PSD increment standards for SO ₂ .

Citation	Title	Applicability	Applicable Test Method	Compliance Status
AQR Section 12.2.18	Requirements for major HAP sources.	Not Applicable.	Not Applicable.	KINDER MORGAN complies with applicable requirements.
AQR Section 12.2.19	Requirements for specific air pollutants: TCS sources in Clark County	Not Applicable.	Not Applicable.	KINDER MORGAN complies with applicable requirements.
AQR Section 14.1. Subpart A	New Source Performance Standards (NSPS) General Provisions	Applicable – KINDER MORGAN is an affected facility (for NSPS Subparts K, Kb, and XX) under the regulations. Section 14 is locally enforceable; however, the NSPS standards referenced are federally enforceable.	Applicable testing, monitoring, recordkeeping and reporting requirements.	KINDER MORGAN complies with applicable requirements.
AQR Section 16	DAQEM Operating Permits	Applicable – KINDER MORGAN must apply for and obtain a DAQEM operating permit prior to operation.	KINDER MORGAN currently has applied for all required Section 16 Operating Permits.	KINDER MORGAN complies with applicable requirements.
AQR Section 18	Permit and Technical Service Fees	Applicable – KINDER MORGAN will be required to pay all required/applicable permit and technical service fees.	KINDER MORGAN is required to pay all required/applicable permit and technical service fees.	KINDER MORGAN complies with applicable requirements.
AQR Section 19	40 CFR Part 70 Operating Permits	Applicable – KINDER MORGAN is a major stationary source and under Part 70, Title V permit applications will be submitted within 12 months of startup. Renewal applications are due between 6 and 18 months prior to expiration. Section 19 is both federally and locally enforceable	KINDER MORGAN has submitted the Part 70 permit applications within the appropriate timeframes.	KINDER MORGAN complies with applicable requirements.
AQR Section 25	Upset/Breakdown, Malfunctions	Applicable – Any upset, breakdown, emergency condition, or malfunction which causes emissions of regulated air pollutants in excess of any permit limits shall be reported to Control Officer. Section 25.1 is locally and federally enforceable.	Any upset, breakdown, emergency condition, or malfunction in which emissions exceed any permit limit shall be reported to the Control Officer within one (1) hour of onset of such event. Section 25.1 is locally and federally enforceable.	KINDER MORGAN currently complies with applicable requirements.
AQR Section 26	Emissions of Visible Air Contaminants	Applicable – Opacity for any emission unit may not exceed 20 percent for more than three (3) minutes in any 60-minute period.	Compliance determined by EPA Method 9.	KINDER MORGAN complies with applicable requirements.

Citation	Title	Applicability	Applicable Test Method	Compliance Status
AQR Section 29	Sulfur Content of Fuel Oil	Applicable – The diesel fuel that is used at KINDER MORGAN must be low sulfur fuel with sulfur content less than 0.05 percent by weight. Section 29 is locally enforceable only.	Fuel sulfur content verification obtained from fuel oil supplier.	KINDER MORGAN complies with applicable requirements.
AQR Section 40	Prohibition of Nuisance Conditions	Applicable – No person shall cause, suffer or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance. Section 40 is locally enforceable only.	KINDER MORGAN air contaminant emissions controlled by pollution control devices or good combustion in order not to cause a nuisance.	KINDER MORGAN complies with applicable requirements.
AQR Section 41	Fugitive Dust	Applicable – KINDER MORGAN shall take necessary actions to abate fugitive dust from becoming airborne.	KINDER MORGAN utilizes appropriate best practices to not allow airborne fugitive dust.	KINDER MORGAN complies with applicable requirements.
AQR Section 42	Open Burning	Applicable – In event KINDER MORGAN burns combustible material in any open areas, such burning activity will have been approved by Control Officer in advance. Section 42 is a locally enforceable rule only.	KINDER MORGAN will contact the DAQEM and obtain approval in advance for applicable burning activities as identified in the rule.	KINDER MORGAN complies with applicable requirements.
AQR Section 43	Odors in the Ambient Air	Applicable – An odor occurrence is a violation if the Control Officer is able to detect the odor twice within a period of an hour, if the odor causes a nuisance, and if the detection of odors is separated by at least fifteen minutes. Section 43 is a locally enforceable rule only.	KINDER MORGAN will not operate its facility in a manner which will cause odors.	KINDER MORGAN complies with applicable requirements.
40 CFR Part 52.21	Prevention of Significant Deterioration (including Preconstruction permits)	Applicable – KINDER MORGAN is a major source and is listed as one of the 28 source categories.	BACT analysis, air quality analysis using modeling, and visibility and additional impact analysis performed for original ATC permits.	KINDER MORGAN complies with applicable sections as required by PSD regulations.
40 CFR Part 52.1470	SIP Rules	Applicable – KINDER MORGAN is classified as a Title V source, and SIP rules apply.	Applicable monitoring and record keeping of emissions data.	KINDER MORGAN is in compliance with applicable state SIP requirements including monitoring and record keeping of emissions data.

Citation	Title	Applicability	Applicable Test Method	Compliance Status
40 CFR Part 60, Subpart A	Standards of Performance for New Stationary Sources (NSPS) – General Provisions	Applicable – KINDER MORGAN is an affected facility under the regulations.	Applicable monitoring, recordkeeping and reporting requirements.	KINDER MORGAN complies with applicable requirements.
40 CFR Part 60, Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after June 11, 1973, and prior to May 19, 1978	Applicable – KINDER MORGAN is an affected facility under the regulations.	Applicable control, monitoring, recordkeeping and reporting requirements.	KINDER MORGAN complies with applicable requirements.
40 CFR Part 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984	Applicable – KINDER MORGAN is an affected facility under the regulations.	Applicable control, monitoring, recordkeeping and reporting requirements.	KINDER MORGAN complies with applicable requirements.
40 CFR Part 60, Subpart XX	Standards of Performance for Bulk Gasoline Terminals	Applicable – KINDER MORGAN is an affected facility under the regulations.	Applicable control, monitoring, recordkeeping and reporting requirements.	KINDER MORGAN complies with applicable requirements.
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)	Applicable – Emissions from stacks are subject to opacity standards.	Opacity determined by EPA Method 9.	KINDER MORGAN complies with applicable requirements.
40 CFR Part 63, Subpart BBBBBB	Emission Standards for Hazardous Air Pollutants – Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities	Applicable – KINDER MORGAN is an affected facility under the regulations.	Applicable control, monitoring, recordkeeping and reporting requirements.	KINDER MORGAN complies with applicable requirements.
40 CFR Part 64	Compliance Assurance Monitoring	Not Applicable – KINDER MORGAN does not have major emissions units originally permitted during the applicable dates..	KINDER MORGAN does not have CAM requirements, but does have compliance demonstration requirements for regulated pollutants.	KINDER MORGAN complies with applicable requirements.

Citation	Title	Applicability	Applicable Test Method	Compliance Status
40 CFR Part 70	Federally Mandated Operating Permits	Applicable – Republic is a major stationary source and under Part 70 the initial Title V permit application was submitted as required. Renewal applications are due between 6 and 18 months prior to expiration. Revision applications will be submitted within 12 months or commencing operation of any new emission unit.	Republic submitted a timely renewal application. Applications for new units will be submitted within 12 months of startup.	Republic complies with applicable requirements.
40 CFR Part 72	Acid Rain Permits Regulation	Not Applicable.	Not Applicable.	Not Applicable.
40 CFR Part 73	Acid Rain Sulfur Dioxide Allowance System	Not Applicable.	Not Applicable.	Not Applicable.
40 CFR Part 75	Acid Rain CEMS	Not Applicable.	Not Applicable.	Not Applicable.

VII. EMISSION REDUCTION CREDITS (OFFSETS)

The source is subject to offset requirements in accordance with AQR Section 59. Offset requirements and associated mitigation are pollutant-specific.

VIII. ADMINISTRATIVE REQUIREMENTS

DAQEM proposes to issue the Part 70 Operating Permit conditions on the following basis:

Legal:

On December 5, 2001, in Federal Register Volume 66, Number 234 FR30097 the EPA fully approved the Title V Operating Permit Program submitted for the purpose of complying with the Title V requirements of the 1990 CAAA and implementing 40 CFR 70.

Factual:

Calnev Pipe Line LLC has supplied all the necessary information for DAQEM to draft Part 70 Operating Permit conditions encompassing all applicable requirements and corresponding compliance.

Conclusion:

DAQEM has determined that Kinder Morgan will continue to determine compliance through the use of CEMS, performance testing, quarterly reporting, daily recordkeeping, coupled with annual certifications of compliance. DAQEM proceeds with the preliminary decision that a Part 70 Operating Permit should be issued as drafted to Calnev Pipe Line LLC for a period not to exceed five years.