



SOUTH COAST AIR QUALITY MANAGEMENT	Pages 2	Page 1
ENGINEERING AND COMPLIANCE DIVISION Waste Management & Bulk Terminal Permitting	A/N TBD	Date 11/13/13
Tesoro Logistics, LLC	Processed by SC06	Checked by <i>CDT</i>

RECLAIM INCLUSION

APPLICANT	Tesoro Logistics Operations, LLC Co. ID# 167981
MAILING ADDRESS	2101 E. Pacific Coast Highway Wilmington, Ca 90744-2914
EQUIPMENT LOCATION	1930 E. Pacific Coast Hwy Wilmington, CA 90744

BACKGROUND

Tesoro Logistics Operations, LLC (Tesoro) is a Title V facility which is primarily a tank storage and bulk loading terminal consisting of various size tanks used to store various refinery products and loading racks to deliver the products into tank trucks for further distribution to the marketplace.

This application was filed because the facility's 2005 Annual Emissions Report (AER) showed that the facility exceeded 4 tons per year of NOx emissions. Therefore, the facility is required to enter the NOx Regional Clean Air Incentive Market (RECLAIM) program. This application will be used to issue a new Facility Permit in the RECLAIM format to accommodate the inclusion of the facility into the RECLAIM program.

The only piece of NOx emitting equipment is an air pollution control system (Device C116) which is used to vent four gasoline product bulk unloading/loading systems. The bulk loading/unloading systems all have valid permits to operate (see section D of the Title V Permit). The thermal oxidizer is rated at 77.8 mmbtu/per hour and currently operates under a valid Permit to Construct in Section H of the Title V permit.

Based on the 2011 and 2012 Annual Emission Reports, Device C116 is considered a Large NOx Source under Regulation XX. This determination was made based on the following.

A Large NOx Source is any one of the following NOx emitting equipment: (A) any boiler, furnace, oven, dryer, heater, incinerator, test cell and any liquid or gaseous fueled equipment with a maximum rated capacity: (i) greater than or equal to 40 but less than 500 million Btu per hour and an annual heat input of 90 billion Btu per year or less. The equipment has a heat input of 77.8 mmbtu/hr and Tesoro has agreed to a permit condition to limit the annual heat input of the equipment to no more than 90 billion Btus per year. Thus, this equipment qualifies as a Large NOx Source.



SOUTH COAST AIR QUALITY MANAGEMENT	Pages 2	Page 2
<i>ENGINEERING AND COMPLIANCE DIVISION</i> <i>Waste Management & Bulk Terminal Permitting</i>	A/N TBD	Date 11/13/13
Tesoro Logistics, LLC	Processed by SC06	Checked by

PROCESS DESCRIPTION

This bulk loading terminal receives gasoline and diesel fuel via pipeline from refineries located in Southern California. These fuels are then stored and ultimately loaded into tanker trucks. The VOC emission from the loading operation are vented to a vapor control system equipped with a thermal oxidizer (Device C116). The thermal oxidizer combusts organic liquid vapors and a small amount of natural gas which results in NOx emissions. The thermal oxidizer is identified as a NOx Large Source.

EMISSIONS

There is no change in emissions from the proposed permit revision, since there are no equipment modifications or changes to permit conditions limiting fuel usage or throughput of bulk organic liquids transferred through this facility.

EVALUATION

Rule 212

This facility is not located within 1000 feet of a school and there is no increase in emissions of criteria pollutants. Therefore, no public notice is required by this rule.

Rule 1301/1401 –BACT, Offsets, Modeling and Risk Assessment

Since the proposed revision is only to incorporate the facility into the NOx RECLAIM program and change the permit format, there is no increase in the emissions of VOC, SOx, PM 2.5, PM10, or Toxic Air Contaminants. Therefore, there are no offset, BACT or Modeling requirements under Regulation XIII and a Risk Assessment is not required under Rule 1401.

Regulation XX

The final Nox allocations will be determined on either the 2004-2005 or 2005-2006 Annual Emissions Report.

This facility will follow the monitoring, record keeping, and reporting requirement of Rules 2004 and 2012. Monitoring equipment will be installed and certified no later than 12 months after entry into the RECLAIM program.

Regulation XXX

Since there is no increase in emissions, and the proposed monitoring, record keeping, and reporting conditions are more stringent or equivalent to the existing permit, the proposed permit revision is classified as "Minor" permit revision and is subject to a 45-day review by EPA.

RECOMMENDATION

Issue a revised Title V facility permit in the RECLAIM format following a 45-day review by EPA.