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***MOJAVE DESERT***  
***AIR QUALITY MANAGEMENT DISTRICT***

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**FOP Evaluation Document**

**Preliminary Determination/Decision - Statement of Basis**

*for*  
*Renewal of*

**FOP Number: 0200353**

*For:*

**Calnev Pipe Line, LLC**

*Facility:*

**Calnev Pipe Line, LLC –  
Barstow Terminal**

*Facility Address:*

**34277 Daggett-Yermo Road  
Daggett, CA 92327**

Document Date: **November 15<sup>th</sup>, 2017**

Submittal date to EPA/CARB for review: **November 15<sup>th</sup>, 2017**

EPA/CARB 45-day Commenting Period ends: **December 31<sup>st</sup>, 2017**

Public Notice Posted: **November 16<sup>th</sup>, 2017**

Permit Issue date: On or about **January 1<sup>st</sup>, 2018**

Permitting Engineer:  
Guy Smith

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***14306 PARK AVENUE, VICTORVILLE, CALIFORNIA 92392***  
***PHONE: (760) 245-1661 • FAX: (760) 245-2022 • EMAIL: PERMITTING@MDAQMD.CA.GOV***

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## **A. Introduction**

### ***1. Background***

Calnev Pipe Line, LLC - Barstow Terminal, Federal Operating Permit (FOP) number 0200353, located at 34277 Daggett-Yermo Road, near Barstow, California, is a Bulk Fuel Terminal For Hire consisting of fourteen above ground Petroleum Product Storage tanks, two Tanker Loading Systems, one Ethanol Tanker Truck Unloading System, and one Gasoline Vapor Disposal System (Thermal Oxidizer). The facility is located within the District's Federal Ozone Nonattainment Area (FONA).

The Mojave Desert Air Quality Management District (MDAQMD or District) issued the facility's initial FOP on March 12, 2001. The facility upgraded their floating roof seals in 2001 and added a tanker truck ethanol unloading system in 2003. The facility has not received any violations during the five year period of their existing Title V FOP. The District received an application for the renewal of their FOP on August 31, 2015, which was deemed complete in accordance with District Rule 1202 – *Applications*, section (D) prior to the expiration of their FOP (please see Appendix A for submitted application), though numerous requests for information and clarification have been requested since then. The last item of clarification from the facility requested the California Air Resources Board (CARB) to review and correct a certification test report. CARB's response to that request was received on 10/02/2017, concurring with Calnev's assertion that Liquified Petroleum Gas / Propane is not used for preheating the burner described in District permit C000106.

Calnev Pipe Line, LLC - Barstow Terminal is defined as a Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definitions*, section 1201(S), as this facility has a Potential to Emit (PTE) greater than 25 tons per year of Volatile Organic Compounds (VOCs). Pursuant to District Rule 1203 – *Federal Operating Permits*, section (B)(1), this document serves as the preliminary determination to issue Calnev Pipe Line, LLC - Barstow Terminal the renewed FOP, inclusive of proposed changes. This preliminary determination was submitted to USEPA and CARB for review on November 15th, 2017 and it will be noticed for public review on November 15th, 2017 as well.

Additionally, Calnev Pipe Line, LLC - Barstow Terminal is defined as a NSR Major Facility pursuant to District Rule 1301 – *NSR Definitions*, as the facility has a PTE greater than the threshold amount specified for VOCs. However, as this proposed renewal does not involve any additional equipment, any changes to existing equipment, or any changes to operating procedures causing any increase in any Nonattainment Air Pollutant/Precursor, no review pursuant to District Rule 1302 – *New Source Review Procedure*, section (D)(1) is required.

Calnev Pipe Line, LLC - Barstow Terminal is not a Major PSD Facility as defined by District Rule 1600 – PSD, incorporating 40 CFR 52 by reference. This facility is not a new major PSD stationary source nor is this facility undergoing a major modification, therefore PSD is not applicable.

This document represents the preliminary compliance review of the proposed renewed FOP to determine whether the continued operation of the facility will comply with all applicable MDAQMD, state and federal rules and regulations.

## ***2. Facility Identifying Information***

<u>Owner/Company Name:</u>	Calnev Pipe Line, LLC
<u>Owner Mailing Address:</u>	1100 Town & Country Rd, Orange, CA 92868
<u>Facility Name:</u>	Calnev Pipe Line, LLC - Barstow Terminal
<u>Facility Location:</u>	34277 Daggett-Yermo Road, Daggett, CA 92327
<u>MDAQMD Federal Operating Permit Number:</u>	0200353
<u>MDAQMD Company Number:</u>	0002
<u>MDAQMD Facility Number:</u>	00353
<u>Responsible Official:</u>	Philip L. Vasquez /Robert Granado
<u>Title:</u>	Director of Operations/Director of EHS
<u>Phone Number:</u>	(909) 873-5123 / (714)560-4873
<u>Facility "Site" Contact:</u>	Robert L. Brown
<u>Title:</u>	Manager
<u>Phone Number:</u>	(760) 254-5472
<u>Email:</u>	robert_brown@kindermorgan.com
<u>Facility "Off Site" Contact:</u>	Yijin Wang
<u>Title:</u>	Manager, Air Quality
<u>Phone Number:</u>	(714) 560-4886
<u>Nature of Business:</u>	Petroleum and Chemical Bulk Stations and Terminals for Hire
<u>SIC/NAICS Code:</u>	4226 / 49319
<u>Facility Location:</u>	34.87557N, 116.88719W

### 3. Description of Permit Units

The applicant proposes to continue operating the following Permit Units:

Table 1 – Permit Units

District Permit	Description Summary
B000105	Tanker Loading System: Nine stations with 4-inch bottom loading arms, controlled by thermal oxidizer C000106
B000728	Tanker Loading System: Three stations with 4-inch bottom loading arms, controlled by thermal oxidizer C000106
B008639	Truck Unloading System: Two 4-inch bulk ethanol unloading hoses
C000106	Fuel Vapor Control System: HIRT LHF 8000X thermal oxidizer fed from 4-inch loading arms via one saturator tank and a vapor holder
T000096	Petroleum Product Storage Tank #330: Multiple product, double deck floating roof construction with a maximum capacity of 6,183 barrels
T000097	Petroleum Product Storage Tank #331: Multiple product, double deck floating roof construction with a maximum capacity of 7,402 barrels
T000098	Petroleum Product Storage Tank #332: Multiple product, double deck floating roof construction with a maximum capacity of 17,315 barrels
T000099	Petroleum Product Storage Tank #333: Multiple product, double deck floating roof construction with a maximum capacity of 17,291 barrels
T000100	Petroleum Product Storage Tank #334: Multiple product, double deck floating roof construction with a maximum capacity of 9,949 barrels
T000101	Petroleum Product Storage Tank #335: Multiple product, double deck floating roof construction with a maximum capacity of 9,959 barrels
T000102	Petroleum Product Storage Tank #325: Diesel/Low RVP product, cone roof and floating pan construction with a maximum capacity of 11,662 barrels
T000103	Petroleum Product Storage Tank #321: Multiple product, cone roof and floating-type pan construction with a maximum capacity of 3,760 barrels
T000104	Petroleum Product Storage Tank #322: Diesel/Low RVP product, cone roof construction with a maximum capacity of 3,015 barrels
T000723	Petroleum Product Storage Tank #320: Multiple product, floating roof construction with a maximum capacity of 12,650 barrels
T000724	Petroleum Product Storage Tank #323: Multiple product, floating roof construction with a maximum capacity of 12,673 barrels
T000725	Petroleum Product Storage Tank #324: Multiple product, fixed conical roof and floating-type pan construction with a maximum capacity of 13,600 barrels
T000726	Petroleum Product Storage Tank #300: Multiple product, fixed roof construction with a maximum capacity of 475 barrels
T000727	Petroleum Product Storage Tank #301: Gasoline additive storage, fixed roof construction with a maximum capacity of 475 barrels

Calnev Pipe Line, LLC - Barstow Terminal proposes renewing their District permits with language changes to equipment descriptions and operating conditions to conform with standard industry terminology and to more clearly reflect their equipment's actual capabilities and limitations.

## **B. Rule Applicability**

### ***1. District Rules***

Rule 201/203 – *Permits to Construct/Permit to Operate*. Any equipment which may cause the issuance of air contaminants must obtain authorization for such construction from the Air Pollution Control Officer. Calnev Pipe Line, LLC - Barstow Terminal is in compliance with this rule as they appropriately applied for a District permit for all new equipment and maintains District permits for all residing equipment.

Rule 204 – *Permit Conditions*. To assure compliance with all applicable regulations, the Air Pollution Control Officer (Executive Director) may impose written conditions on any permit. The District permit conditions listed in section (B)(10) are written to ensure Calnev Pipe Line, LLC - Barstow Terminal complies with all applicable regulations.

Rule 206 – *Posting of Permit to Operate*. Equipment shall not operate unless the entire permit is affixed upon the equipment or kept at a location for which it is issued and will be made available to the District upon request. The applicant is aware of this requirement.

Rule 207 – *Altering or Falsifying of Permit*. A person shall not willfully deface, alter, forge, or falsify any issued permit. The applicant is aware of this requirement.

Rule 209 – *Transfer and Voiding of Permits*. Calnev Pipe Line, LLC - Barstow Terminal shall not transfer, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another. When equipment which has been granted a permit is altered, changes location, or no longer will be operated, the permit shall become void.

Rule 210 – *Applications*. Calnev Pipe Line, LLC - Barstow Terminal provided all the required information to correctly address the proposed equipment pursuant to this rule, although there were several instances in which additional information were required, in which the thirty (30) day clock was restarted.

Rule 212 – *Standards for Approving Permits*. This rule establishes baseline criteria for approving permits by the MDAQMD for certain projects. In accordance with these criteria, the proposed renewal application does not cause issuance of air contaminants in violation of Sections 41700 or 41701 of the State of California's Health and Safety code.

Rule 221 – *Federal Operating Permit Requirement*. Calnev Pipe Line, LLC - Barstow Terminal is in compliance with this rule, as they currently hold and maintain a Federal Operating Permit.

While their actual emissions are expected to be below the applicable thresholds of Regulation XII, Calnev Pipe Line, LLC - Barstow Terminal requests to keep their Federal Operating Permit, and has not volunteered to the emission limitations of Section (B) of District Rule 221.

Rule 301 – *Permit Fees*. The proposed renewal will not increase Calnev Pipe Line, LLC - Barstow Terminal's annual permit fees except as allowed for annual inflation adjustments.

Rule 401 – *Visible Emissions*. This rule limits visible emissions opacity to less than 20 percent (or Ringlemann No. 1). In normal operating mode, Calnev Pipe Line, LLC - Barstow Terminal's visible emissions are not expected to exceed 20 percent opacity.

Rule 402 – *Nuisance*. This rule prohibits facility emissions that cause a public nuisance. The equipment authorized in the proposed renewal is required by permit condition to employ good engineering and operational principles in order to minimize emissions and the possibility of a nuisance. Furthermore, Calnev Pipe Line, LLC - Barstow Terminal has not received any nuisance complaints during the previous ten years.

Rule 408 – *Circumvention*. This rule prohibits hidden or secondary rule violations. The current and proposed continuing operations are not expected to violate Rule 408.

Rule 430 – *Breakdown Provisions*. Any Breakdown which results in a violation to any rule or regulation as defined by Rule 430 shall be properly addressed pursuant to this rule.

Rule 432 – *Gasoline Specifications*. This rule prohibits the sale of gasoline or supplying gasoline for use within the District that has a degree of unsaturation greater than that indicated by a Bromine Number of 30 as determined by ASTM Method D1159. Specific permit conditions have been established to ensure compliance with this rule.

Rule 461 – *Gasoline Transfer and Dispensing*. This rule limits the emission of VOCs and toxic compounds from the transfer and marketing of gasoline and, in conjunction with Rules 462 and 463, limit the emissions from the storage and transfer of gasoline from bulk facilities. Specific permit conditions have been established to ensure compliance with this rule.

Rule 462 – *Organic Liquid Loading*. This rule limits the emission of VOCs and toxic compounds from organic liquid loading and, in conjunction with Rules 461 and 463, limit the emissions from the storage and transfer of gasoline from bulk facilities. Specific permit conditions have been established to ensure compliance with this rule.

Rule 463 – *Storage of Organic Liquids*. This rule limits the emission of VOCs and toxic compounds during the storage of organic liquids and, in conjunction with Rules 461 and 462, limit the emissions from the storage and transfer of gasoline from bulk facilities. Specific permit conditions have been established to ensure compliance with this rule.

Rule 900 – *Standards of Performance for New Stationary Sources (NSPS)*. Rule 900 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth

in 40 CFR 60. Calnev Pipe Line, LLC - Barstow Terminal is subject to the following New Source Performance Standards:

40 CFR 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 for the following tanks: T000096, T000097, T000098, T000099, T000100, T000101, T000103, T000723, T000724, T000725, and T000726.

40 CFR 60 Subpart XX – Standards of Performance for Bulk Gasoline Terminals. The terminal is subject to this Subpart.

Regulation X – *National Emission Standards for Hazardous Air Pollutants*. Pursuant to Regulation X, Notification (ATCMs), Calnev Pipe Line, LLC - Barstow Terminal is required to comply with all applicable ATCMs, however there are no current ATCMs governing any operations at the facility. Calnev Pipe Line, LLC - Barstow Terminal is subject to two NESHAPs as discussed in section 5.c below.

Rule 1102 – *Fugitive Emissions of VOCs from Components at Pipeline Transfer Stations*. Calnev Pipe Line, LLC - Barstow Terminal meets the definition of a Pipeline Transfer Station as defined in Rule 1102(B)(17). Permit conditions have been included to ensure compliance with this rule. No components at the facility have been identified as being either Inaccessible or Unsafe as defined in this rule.

#### Regulation XII – *Title V Permits*

This regulation contains requirements for sources which must have a FOP. Calnev Pipe Line, LLC - Barstow Terminal currently has a FOP and is expected to comply with all applicable rules established in Regulation XII.

Rule 1201 – *Federal Operating Permit Definitions*. Calnev Pipe Line, LLC - Barstow Terminal is defined as a federal Major Facility pursuant to this rule.

Rule 1203 – *Federal Operating Permits*. This document represents the preliminary determination for the proposed renewal to Calnev Pipe Line, LLC - Barstow Terminal's FOP. The revised FOP will be included with this submission as required by section (B)(1)(a). This proposed renewal will also be properly noticed pursuant to District Rule 1207, as required.

Rule 1207 – *Notice and Comment*. This proposed renewal will be properly noticed pursuant to District Rule 1207, as required.

Rule 1208 – *Certification*. Calnev Pipe Line, LLC - Barstow Terminal included a Certification of Responsible Official as required with the submitted application for the proposed equipment.

Rule 1211 – *Greenhouse Gas Provisions of Federal Operating Permits*. Calnev Pipe Line, LLC - Barstow Terminal is not a Major GHG Facility pursuant to Rule 1211.

FOP Renewal – Preliminary Determination  
and Statement of Basis  
Calnev Pipe Line, LLC - Barstow Terminal  
November 15, 2017



District Rule 1520 – *Control of Toxic Air Contaminants from Existing Sources* applies to Calnev Pipe Line, LLC - Barstow Terminal, as they are an existing facility that has a facility PTE greater than ten (10) tons per year for VOC as well as a PTE to emit a TAC (Section (B)(1)(a) and (c)). Calnev Pipe Line, LLC - Barstow Terminal’s most recent (2016 emission year) CEIR was utilized to fulfill the requirements of section (D)(1)(b)(i) of District Rule 1520. The Facility Prioritization Scores are represented in Table 2, below. As illustrated in Table 2, all three scores for the facility are less than one (1), therefore categorizing Calnev Pipe Line, LLC - Barstow Terminal as ‘Low Priority’. Based on the requirements of District Rule 1520, section (E)(1)(b), no further analysis is required.

<b>Table 2 – Facility Prioritization Scores</b>				
<b>Receptor Distance (meters)</b>	<b>Receptor Type</b>	<b>Toxic Effect</b>	<b>Total Prioritization Score</b>	<b>Prioritization Category (Low, Intermediate, or High)</b>
460 (North of facility)	Resident	Carcinogenic	0.24	Low
		Non-carcinogenic Acute	0.000	Low
		Non-carcinogenic Chronic	0.021	Low

## 2. State Regulations

California Health and Safety Code section 41954 requires the California Air Resources Board (CARB) to certify systems designed to control gasoline vapor emissions during gasoline marketing operations, and has further determined that bulk terminals are included in this category. Calnev Pipe Line, LLC - Barstow Terminal has complied with this requirement by having their vapor processing system certified by CARB on June 9<sup>th</sup>, 2002, using the protocols found in Certification Procedure 203. Federally enforceable throughput limits for the facility have been included in the FOP based on the certification test results.

## 3. Federal Regulations

40 CFR 60 Subpart A – *General Provisions*: Calnev Pipe Line, LLC - Barstow Terminal is subject to this subpart. Federally enforceable permit conditions have been included to ensure compliance with this subpart.

40 CFR 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*: Pursuant to 40 CFR 60.110b(a) and (b), Calnev Pipe Line, LLC - Barstow Terminal is subject to this subpart for the following tanks: T000096, T000097, T000098, T000099, T000100, T000101, T000103, T000723, T000724, T000725, and T000726. Federally enforceable permit conditions have been included to ensure compliance

with this subpart. Please note that the more stringent limitation of 11.0 psia true vapor pressure mandated in District Rule 463 takes precedence over the more lenient maximum limitation of 11.11 psia true vapor pressure noted in this regulation.

40 CFR 60 Subpart XX – *Standards of Performance for Bulk Gasoline Terminals*. Pursuant to 40 CFR 63.11081(a), Calnev Pipe Line, LLC - Barstow Terminal is subject to this Subpart and Federally enforceable permit conditions have been included to ensure compliance.

40 CFR 61, Subpart M – *National Emission Standard for Asbestos*

This facility on an as needed basis is subject to Section 61.145 through 61.147 - standards for the demolition and renovation of asbestos. Historically, the facility has been in compliance with the requirements of these standards. Appropriate conditions are included on Calnev Pipe Line, LLC - Barstow Terminal's Federal Operating Permit in section (II)(C) to ensure continued compliance with these requirements.

40 CFR 63 Subpart A – *General Provisions*: Calnev Pipe Line, LLC - Barstow Terminal is subject to this subpart. Federally enforceable permit conditions have been included to ensure compliance with this subpart.

40 CFR 63 Subpart BBBBBB - *National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities*: Pursuant to CFR 63.11081(a)(1), Calnev Pipe Line, LLC - Barstow Terminal is an area HAP source subject to this subpart and Federally enforceable permit conditions have been included to ensure compliance.

40 CFR 64 – *Compliance Assurance Monitoring*. Calnev Pipe Line, LLC - Barstow Terminal will continue to operate under a District-approved Compliance Assurance Monitoring (CAM) Plan and Federally enforceable permit conditions have been included to ensure compliance as follows:

The Compliance Assurance Monitoring (CAM) Rule (40 CFR 64) applies to each Pollutant Specific Emissions Unit (PSEU) when it is located at a major source that is required to obtain a Title V, Part 70 or 71 permit and it meets all of the following criteria:

The PSEU must:

- a. Be subject to an emission limitation or standard; AND,
- b. Use a control device to achieve compliance; AND,
- c. Have the **potential pre-control** emissions that exceed or are equivalent to the major source threshold.

Note: "PSEU" or Pollutant Specific Emission Unit, means an emissions unit considered separately with respect to each regulated air pollutant.

The Loading Racks at Calnev Pipe Line, LLC - Barstow Terminal meet the criteria specified in "a", "b", and "c" above and are subject to CAM pursuant to 40 CFR 64 as shown in the Table below.

<b>District Permits</b>	<b>Pollutant subject to Limitation or Standard</b>	<b>Major Source Threshold (tpy)</b>	<b>Pre-Control PTE greater than 100% of Major Source Threshold</b>	<b>Unit uses a control device</b>	<b>Exempt from CAM</b>	<b>CAM Plan Required</b>
<b>B000105 and B000728</b>	<b>VOC</b>	<b>250</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>	<b>YES</b>

*a. CAM Plan Development*

This Compliance Assurance Monitoring (CAM) Plan was developed in accordance with 40 CFR Section 64.3 - Monitoring design criteria. Within these regulations, requirements for selecting monitoring parameters and establishing operating ranges are outlined. The plan was developed to include specified methods to determine compliance with an emission limitation on a continuous basis, consistent with the averaging period established for the emission unit in the operating permit. The plan addresses the operation of the thermal oxidizer controlling volatile organic compound (VOC) emissions from the loading racks at the Calnev Pipe Line, LLC Barstow Terminal.

The basis for selecting monitoring parameters and establishing operating ranges to ensure continued compliance are discussed in the sections below. Equipment description, performance indicators, operating ranges, and justification for each indicator are described.

*b. Operational Description*

Standard operations at the Barstow terminal includes loading tank trucks with diesel fuels, jet fuels, and gasoline from various storage tanks through one of two facility tanker loading systems. A total of 12 loading arms are utilized on site. Nine are normally being used (8 plus 1 spare) to load either diesel or gasoline and 3 are normally being used to load diesel. The vapor collection systems transport vapors from the loading racks through a saturator-condensate tank and then to a vapor holding tank. When the vapor holding tank reaches a certain volume, vapors are then vented to the thermal oxidizer. The system is also permitted for direct venting from the loading systems to the thermal oxidizer when the vapor tank is out of service.

Emissions Unit Description: Nine-station gasoline and diesel loading system;  
Three-station diesel fuel loading system

Emissions Unit Identification: North and South Loading Racks, District Permits  
B000105 and B000728

Stack Name/Designation: Thermal Oxidizer, District Permit C000106

Facility Name and Location:	Calnev Pipe Line, LLC Barstow Terminal, Daggett, CA
Regulation No.:	Federal Operating Permit No. 0200353
Regulated Pollutant:	VOC
Emission Limit:	95% Destruction Efficiency and 0.08 lb VOC per 1,000 gallons product transferred
Monitoring Requirements in Permit:	See District Permit C000106, Condition 6
Control Technology Description:	Thermal Oxidizer – Hirt Model LHF 8000X

*c. Main Elements of the CAM Plan*

The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in the following Table:

## Compliance Assurance Monitoring Approach

General Criteria	Indicator #1	Indicator #2	Indicator #3
Parameter	Exhaust Stack Temperature (3 ft above chamber)	Work Practice – Inspection and Maintenance	Work Practice– Inspection and Maintenance
Measurement Approach	Monitored continuously with a thermocouple.	Periodic inspection and maintenance of the burner.	Periodic inspection and maintenance of the vapor compressor.
Indicator Range	At or above 1000 degrees F	An excursion is defined as failure to perform annual inspection and/or manufacturer’s recommended maintenance frequency.	An excursion is defined as failure to perform annual inspection and/or manufacturer’s recommended maintenance frequency.
<b>Performance Criteria</b>			
Data Representativeness	The thermocouple is located on the stack. The minimum tolerance of the thermocouple is approximately +/- 0.75% ( $\approx$ 10 degrees F). The temperature is monitored via a Programmable Logic Computer (PLC). The minimum set point is 1000 degrees F. Above this temperature, 95% destruction efficiency is achievable.	Not Applicable	Not Applicable.
Verification of Operational Status	Not Applicable.	Not Applicable.	Not Applicable.
QA/QC Practices and Criteria	The thermocouple is factory calibrated. The thermal oxidizer maintenance schedule does not include any requirements for thermocouple calibration.	Not Applicable.	Not Applicable.

Monitoring Frequency	Measured continuously.	At least an annual inspection of the burner and periodic maintenance at a frequency in accordance with applicable manufacturer's suggested schedule.	At least an annual inspection of the compressor and periodic maintenance at a frequency in accordance with applicable manufacturer's suggested schedule.
Data Collection Procedure	Recorded continuously.	Record results of maintenance procedures and annual inspection to be maintained for a 5 year period.	Record results of maintenance procedures and annual inspection to be maintained for a 5 year period.
Averaging Period	No average is taken.	Not Applicable.	Not Applicable.

*d. Rationale for selection of performance indicators*

Temperature was selected because it is indicative of proper thermal oxidizer operation (combustion occurring within the chamber). If the temperature decreases below a specified set point, complete combustion may not occur. Proper temperature operation will achieve high VOC efficiency control.

The inspection and maintenance work practice comprised of an annual inspection (including tuning) of the thermal oxidizer burner was selected because an inspection verifies equipment integrity and periodic tuning will maintain proper burner operation and efficiency. Following manufacturer's suggested maintenance practices will further ensure reliable operation.

Also, annual inspection of the vapor compressor was selected because a consistent vapor feed to the burners will result in stable operation and optimal burner efficiency. Following manufacturer's suggested maintenance practices will further ensure reliable operation.

*e. Rationale for selection of indicator range*

The selected indicator range is at or above 1000 degrees F. Above this temperature, the thermal oxidizer will be achieving at least 95% destruction efficiency (as required by the operating permit). The PLC employs temperature controlled feedback that maintains the desired temperature. The temperature controller is set to maintain a minimum temperature of 1000 degrees F.

The facility will conduct a one-time source test to verify that a minimum 95% VOC destruction efficiency can be maintained at the 1000 degrees F thermal oxidizer operating temperature.

*40 CFR Part 82 – Protection of Stratospheric Ozone*

This facility is in compliance with the requirements of this part. Any servicing of air conditioners is performed by a qualified contracting company. An appropriate condition will be included on the permit to ensure continued compliance with these requirements.

***4. Determination of Requirements for Prevention of Significant Deterioration***

PSD applies to any new PSD Major Stationary Source or the major modification of any existing PSD major source, of which Calnev Pipe Line, LLC - Barstow Terminal is neither.

**C. Rules and Regulations Not Applicable to the Proposed Permit Renewal**

***1. District Rules***

*Regulation XIII – New Source Review*

*Rule 1302 – Procedure.* This rule applies to all new or Modified Facilities and requires certain requirements to be fulfilled when submitting an application. All applicable requirements of this

rule are discussed in District NSR documents as part of the Analysis procedure. Certification of compliance with the Federal Clean Air Act, applicable implementation plans, and all applicable District rules and regulations would be addressed. However, as this FOP renewal does not involve any new, modified, relocated, or reconstructed equipment, nor any change in emissions, New Source Review procedures are not required.

**Rule 1303 – Requirements.** This rule requires BACT and offsets for selected facility modifications. Equipment installed shall meet BACT and prior to the commencement of construction the proponent shall have obtained sufficient offsets to comply with Rule 1303(B)(1). Calnev Pipe Line, LLC - Barstow Terminal is not installing any new or modified equipment, therefore no new BACT determinations are required. Furthermore, Calnev Pipe Line, LLC - Barstow Terminal is not subject to the requirements of offsets, as this FOP renewal does not generate an emissions increase.

**Rule 1304 – Emissions Calculations.** This rule delineates procedures for calculating emissions for new or modified equipment installations. As this FOP renewal does not involve any new, modified, relocated, or reconstructed equipment, no emissions calculations are required.

**Rule 1320 – New Source Review for Toxic Air Contaminants,** requires a preconstruction review of all new, modified, relocated, or reconstructed facilities which have the potential to emit any Hazardous air Pollutant (HAP), Toxic Air Contaminant (TAC), or Regulated Toxic substance. As this FOP renewal does not involve any new, modified, relocated, or reconstructed equipment, no Toxic NSR is required.

#### **Regulation XVI – Prevention of Significant Deterioration**

Calnev Pipe Line, LLC - Barstow Terminal is not subject to PSD as it does not classify as a Major PSD Facility as defined by District Rule 1600 – PSD, incorporating 40 CFR 52.21 by reference. This facility is not a new major PSD stationary source nor is this facility undergoing a major modification, therefore PSD is not applicable to this permit renewal action.

## **2. State Regulations**

**H&S Code 42301.6, Public Notice for Possible Sources of HAP Near a School prior to Approving Permits.** This section of the CA Health and Safety Code requires public noticing for any proposed equipment operating within 1,000 feet of a public or private Kindergarten through Twelfth Grade school. As there are no such schools within 1,000 feet of Calnev Pipe Line, LLC - Barstow Terminal, no H&S Code 42301.6 noticing is required.

## **3. Federal Regulations**

**40 CFR 63 Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations):** Calnev Pipe Line, LLC - Barstow Terminal is not a Major source for HAPs and is exempt from this subpart in accordance with 40 CFR 63.420(b)(2).



40 CFR 63 Subpart EEEE - National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline): Calnev Pipe Line, LLC - Barstow Terminal is not a Major source for HAPs and is exempt from this subpart in accordance with 40 CFR 63.2334(a).

## **D. Proposed Permit Conditions**

Calnev Pipe Line, LLC - Barstow Terminal's current District Permits to Operate contain terminology that is inconsistent with Industry standards and assign permit conditions to equipment not described in that particular permit (such as placing operating restrictions on the Loading Racks on the vapor control system permit). These discrepancies have been corrected in this renewal. Furthermore, the District permits have been expanded to provide more details supporting the underlying Federal Requirements found in 40 CFR 60 subparts Kb and XX and 40 CFR 63 subpart BBBBBB. The following permit conditions will be placed on the District Permits to Operate and will be updated in the renewed FOP under section (III)(D):

### **CONDITIONS APPLICABLE TO TANKER LOADING SYSTEMS B000105 AND B000728:**

1. This equipment shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.  
[District Rules 204 and 1303]
2. This loading system must be vented to the fully functional and properly operating air pollution control equipment operating under valid District Permit C000106.  
[District Rules 1303 and 1320]
3. [For B000105 Only] The combined total volume of petroleum products transferred to cargo tanks from both this system and the system described in District Permit B000728 shall not exceed 1,000,000 gallons per day.  
[District Rule 1303]
3. [For B000728 Only] The combined total volume of petroleum products transferred to cargo tanks from both this system and the system described in District Permit B000105 shall not exceed 1,000,000 gallons per day.  
[District Rule 1303]
4. [For B000105 Only] The combined total volume of product transferred to cargo tanks from both this system and the system described in District Permit B000728 shall not exceed 72,000 gallons per hour.  
[District Rule 1303]

4. [For B000728 Only] The combined total volume of product transferred to cargo tanks from both this system and the system described in District Permit B000105 shall not exceed 72,000 gallons per hour.  
[District Rule 1303]
5. A non-resettable meter, either mechanical or digital, shall be installed to indicate hourly and daily loading, in gallons.  
[District Rule 1303]
6. Gasoline shall only be loaded into tanker truck cargo tanks that are vapor tight as specified in 40 CFR 60.502(e) through (j).  
[40 CFR 60.502, 40 CFR 63.11088]
7. Each open-ended line that has the potential to emit vapors shall be sealed with a second valve, a blind flange, a cap or a plug when not in use.  
[District Rules 1102(C)(2) and 462]
8. A pressure gauge shall be installed in the vapor return line and the pressure at this point shall not exceed eighteen (18) inches of water during cargo tank loading.  
[ARB CP-203, District Rules 1303 and 1320]
9. The owner/operator shall maintain a log of all inspections, repairs, and maintenance on this equipment current and on-site (or at a central location) for a minimum of five (5) years, and this log shall be provided to District, State and Federal personnel upon request.  
[40 CFR 63.10(b)]
10. The owner/operator shall maintain a throughput log for each day's operations (from midnight to midnight) which shall include, as a minimum, the following information. This log shall be kept current and on-site (or at a central location) for a minimum of five (5) years, and shall be provided to District, State and Federal personnel upon request:
  - a. Product Name and CAS Number;
  - b. Amount transferred, in gallons;
  - c. Monthly totals of each product transferred;
  - d. Running 12 consecutive month totals of each product transferred; and
  - e. Maximum vapor return line gauge pressure during cargo tank loading, in inches of water.  
[40 CFR 70.6(a)(3)(ii)(b), District Rule 462]
11. A person shall not sell or supply for use within the District as a fuel for motor vehicles as defined by the Vehicle Code of the State of California, gasoline having a degree of unsaturation greater than that indicated by a Bromine Number of 30 as determined by ASTM Method D1159-66.  
[District Rule 432]

12. Any component found leaking shall be repaired to a leak-free condition within fifteen (15) days of detection unless otherwise allowed by District Rule 1102. Furthermore, the date each leak was detected, the date the leak was repaired, and the repair actions taken shall be logged as required in Condition #9 above.  
[District Rule 1102, 40 CFR 63.10(b)]
13. A facility wide Comprehensive Emission Inventory (CEI) for all emitted criteria and toxic air pollutants must be submitted to the District, in a format approved by the District, annually and upon District request.  
[District Rule 107(b), H&S Code 39607 & 44341-44342, and 40 CFR 51, Subpart A]

**CONDITIONS APPLICABLE TO ETHANOL TANKER UNLOADING SYSTEM B008639:**

1. This equipment shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.  
[District Rules 204 and 1303]
2. This unloading system shall only transfer denatured ethanol to the organic liquid storage tank operating under valid District Permit T000096 (Tank 330).  
[District Rules 462 and 1303]
3. The owner/operator shall maintain a log of all inspections, repairs, and maintenance on this equipment current and on-site (or at a central location) for a minimum of five (5) years, and this log shall be provided to District, State and Federal personnel upon request. The log shall contain, as a minimum, the following requirements from District Rule 1102:
  - a. Inspection Requirements in accordance with District Rule 1102(D);
  - b. Repair Requirements in accordance with District Rule 1102(E); and
  - c. Recordkeeping and Reporting Requirements in accordance with District Rule 1102(G)(1).[40 CFR 70.6(a)(3)(ii)(b), District Rules 462 and 1102]
4. Test methods for compliance verification shall be in accordance with District Rule 1102(H).  
[District Rule 1102]
5. The vapor balance line shall be connected to the tanker truck during all offloading operations.  
[District Rules 1303 and 1320]

**CONDITIONS APPLICABLE TO FUEL VAPOR CONTROL SYSTEM C000106:**

1. This equipment shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles in a manner consistent with good air pollution control practice for minimizing emissions. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.  
[40 CFR 63.11085, District Rule 1302(C)(2)(a)]
2. This control system must be fully functional and properly operating whenever tanker truck loading at the loading racks described in District Permits B001005 or 000728 is taking place.  
[District Rules 1302 and 1520].
3. The pilot light for this unit shall only be fired on Commercial Grade LPG/Propane with a maximum sulfur content of 185 ppmw.  
[District Rules 431 and 1320]
4. A thermocouple shall be installed in the HIRT Thermal Oxidizer's exhaust stack and the temperature shall be continuously monitored and recorded. Furthermore, the system shall alarm or be automatically shut down whenever the temperature drops below 1,000 degrees Fahrenheit.  
[40 CFR 63.11092]
5. Replacement of or major repairs to the system's motor or compressor assemblies will require a new source test to be completed within sixty (60) days of occurrence to verify system performance is consistent with the initial certification conducted by the ARB. Major repairs are defined as those costing more than 50% of the replacement cost of each assembly. Source testing shall be conducted in accordance with the currently approved Source Test Protocol on file with the District.  
[40 CFR 63.11092, ARB CP-203, District Rule 462]
6. The owner/operator shall maintain an operations log for each day's operations (from midnight to midnight) which shall include, as a minimum, the following information. This log shall be kept current and on-site (or at a central location) for a minimum of five (5) years, and shall be provided to District, State and Federal personnel upon request:
  - a. Records of vapor holder bladder height alarms and related actions;
  - b. Records of thermal oxidizer low temperature alarms and related actions;
  - c. Records of all maintenance or repairs to the primary devices, including the dates and times any temporary vapor control equipment was employed as well as copies of District notifications of the impending use of temporary vapor control equipment; and

- d. Records of the occurrence and duration of each malfunction of operation and what corrective actions were taken to minimize emissions.  
[40 CFR 63.11092, 40 CFR 63.11094, District Rule 462]
7. If the vapor holding tank bladder height reaches 12 feet, an alarm shall actuate in the facility control room and automatically interrupt cargo tank loading at the rack. The system shall not return control to the loading rack until the vapor blower and thermal oxidizer operate in conjunction for a period of no less than five (5) minutes.  
[40 CFR 63.11092, District Rule 462 and 1303]
8. When any of the saturator-condenser tank, vapor holder, gas compressor, blower, thermal oxidizer, or related control elements are out of service due to breakdown or maintenance, any temporary Vapor Combustion System used to process vapors must be capable of meeting the requirements of 40 CFR 63.11092 and 40 CFR 60.503, and have a displaced gasoline vapor destruction rate of no greater than 0.08 lb per 1000 gallons of product loaded.  
[40 CFR 63.11092, ARB CP-203]
9. Prior to the operation of any compliant temporary Vapor Combustion System, the owner/operator shall:
- a. Report the intent to use temporary devices to the District no later than one week prior to the scheduled shutdown of the primary device(s), or as soon as possible if the use of the temporary devices is a result of an emergency;
  - b. The reporting person shall provide to the District an estimate of the repair/maintenance time of the primary unit(s); and
  - c. The reporting person shall provide to the District information as to the nature of the repairs and/or maintenance of the primary device(s).
- [District Rule 1302]
10. Operation of any temporary Vapor Combustion System shall include a monitor to ensure the pilot light is constantly lit.  
[40 CFR 63.11092]
11. Visible emissions from this equipment shall not exceed Ringelmann 1 (20% opacity) for a period or periods aggregating more than three minutes in any one hour.  
[District Rule 401]
12. Volatile Organic Compound (VOC) emissions from this system shall not exceed 0.08 pounds per 1,000 gallons transferred into cargo tanks via the Loading Racks identified in District Permits B000105 and B000728. Furthermore, this system shall maintain a minimum destruction efficiency of 95%.  
[CARB Certification Procedure 203, District Rule 461]  
Note: Initial Certification testing conducted in 2002 demonstrated an emission rate of 0.037 lb total hydrocarbons/1,000 gallons and a destruction efficiency of 99.2%

**CONDITIONS APPLICABLE TO THE FLOATING ROOF STORAGE TANKS T000096, T000097, T000098, T000099, T000100, T000101, T000723, AND T000724:**

1. This equipment shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles in a manner consistent with good air pollution control practice for minimizing emissions. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.  
[40 CFR 63.11085, District Rule 1302(C)(2)(a)]
2. The maximum True Vapor Pressure (TVP) of organic liquids stored in this tank shall not exceed 11.0 psia (75.9 kPa) under storage conditions.  
[40 CFR 60.112b, District Rule 463(C)(1)(a)(viii)]
3. The roof shall be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.  
[40 CFR 60.112b]
4. The accumulated area of gaps between the tank wall and the primary seal shall not exceed 212 square centimeters per meter (10 square inches per foot) of tank diameter, and the width of any portion of any gap shall not exceed 3.81 centimeters (1.5 inches).  
[40 CFR 60.113b]
5. The accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 square centimeters per meter (1.0 square inch per foot) of tank diameter, and the width of any portion of any gap shall not exceed 1.27 centimeters (0.5 inches).  
[40 CFR 60.113b]
6. Measurements of gaps between the tank wall and the primary seal shall be performed during hydrostatic testing of the tank, within 60 days of an initial fill of the tank, and at least once every five (5) years thereafter.  
[40 CFR 60.113b]
7. Measurements of gaps between the tank wall and the secondary seal shall be performed within 60 days of an initial fill of the tank, and at least once per year thereafter.  
[40 CFR 60.113b]
8. All gauge hatches, roof supports, manholes, automatic bleeder vents, rim vents and gauge wells shall be equipped with vapor-tight seals or breather vents set at no less than 10% of the maximum allowable working pressure of the roof.

[District Rule 463]

9. All openings in the tank roof shall be equipped with a projection, which extends below the liquid surface.  
[District Rule 463]
10. Roof drains shall be equipped with slotted membrane fabric cover, or equivalent, which covers at least 90% of the drain area.  
[District Rule 463]
11. The owner/operator shall maintain an operations log for each day's operations (from midnight to midnight) which shall include, as a minimum, the following information. This log shall be kept current and on-site (or at a central location) for a minimum of five (5) years, and shall be provided to District, State and Federal personnel upon request:
  - a. The aggregated total amount of petroleum products transferred from the supplying pipelines and tanker trucks into all storage tanks combined, by product type and CAS, in gallons;
  - b. Average volume of petroleum products stored onsite;
  - c. Storage and transfer temperatures of petroleum products, in degrees Fahrenheit;
  - d. Monthly summary of incoming and outgoing petroleum product throughput, in gallons;
  - e. Running consecutive twelve (12) month summary of incoming and outgoing petroleum product throughput, in gallons;
  - f. Records of all primary and secondary seal inspections;
  - g. Records of all maintenance or repairs to the tank and to the primary and secondary seals, including the dates and times any temporary vapor control equipment was employed, including mobile degassing equipment;
  - h. Records of all tank emptyings and refillings; and
  - i. Records of the occurrence and duration of each malfunction of operation and what corrective actions were taken to minimize emissions.  
[40 CFR 70.6(a)(3)(ii)(b), District Rule 463]

**CONDITIONS APPLICABLE TO CONE ROOF / FLOATING PAN STORAGE TANK  
T000102 AND CONE ROOF STORAGE TANK T000104:**

1. This equipment shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles in a manner consistent with good air pollution control practice for minimizing emissions. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.  
[40 CFR 63.11085, District Rule 1302(C)(2)(a)]

2. The maximum True Vapor Pressure (TVP) of organic liquids stored in this tank shall not exceed 0.75 psi (5.2 kPa) under actual storage conditions.  
[40 CFR 60.112b, District Rule 463(C)(1)]
3. The owner/operator shall maintain an operations log for each day's operations (from midnight to midnight) which shall include, as a minimum, the following information. This log shall be kept current and on-site (or at a central location) for a minimum of five (5) years, and shall be provided to District, State and Federal personnel upon request:
  - a. The aggregated total amount of petroleum products transferred from the supplying pipelines and tanker trucks into all storage tanks combined, by product type and CAS, in gallons;
  - b. Average volume of petroleum products stored onsite;
  - c. Storage and transfer temperatures of petroleum products, in degrees Fahrenheit;
  - d. Monthly summary of incoming and outgoing petroleum product throughput, in gallons;
  - e. Running consecutive twelve (12) month summary of incoming and outgoing petroleum product throughput, in gallons;
  - f. Records of all inspections;
  - g. Records of all maintenance and repair procedures;
  - h. Records of all tank emptyings and refillings; and
  - i. Records of the occurrence and duration of each malfunction of operation and what corrective actions were taken to minimize emissions.[40 CFR 70.6(a)(3)(ii)(b), District Rule 463]

**CONDITIONS APPLICABLE TO CONE ROOF / INTERNAL FLOATING PAN STORAGE TANKS T000103 AND T000725:**

1. This equipment shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles in a manner consistent with good air pollution control practice for minimizing emissions. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.  
[40 CFR 63.11085, District Rule 1302(C)(2)(a)]
2. The maximum True Vapor Pressure (TVP) of organic liquids stored in this tank shall not exceed 11.0 psia (75.9 kPa) under storage conditions.  
[40 CFR 60.112b, District Rule 463(C)(1)(a)(viii)]
3. The roof shall be floating on the liquid at all times (i.e., off the roof leg supports) except during initial fill until the roof is lifted off leg supports and when the tank is completely emptied and subsequently refilled. The process of filling, emptying, or refilling when the roof is resting on the leg supports shall be continuous and shall be accomplished as rapidly as possible.



[40 CFR 60.112b]

4. The accumulated area of gaps between the tank wall and the primary seal shall not exceed 212 square centimeters per meter (10 square inches per foot) of tank diameter, and the width of any portion of any gap shall not exceed 3.81 centimeters (1.5 inches).  
[40 CFR 60.113b]
5. The accumulated area of gaps between the tank wall and the secondary seal shall not exceed 21.2 square centimeters per meter (1.0 square inch per foot) of tank diameter, and the width of any portion of any gap shall not exceed 1.27 centimeters (0.5 inches).  
[40 CFR 60.113b]
6. The concentration of volatile organic compounds in the vapor space above the internal floating roof shall be measured by an explosimeter at least once in every twelve month period. The readings shall not exceed thirty (30) percent of the lower explosive limit (LEL) and results of all such tests shall be made available to District, State, and Federal personnel upon request.  
[District Rule 463(C)(1)(b)]
7. Visual Inspections of the secondary seal shall be performed at least once in every six month period and results of all such tests shall be made available to District, State, and Federal personnel upon request.  
[District Rule 463(C)(1)(b)]
8. All gauge hatches, roof supports, manholes, automatic bleeder vents, rim vents and gauge wells shall be equipped with vapor-tight seals or breather vents set at no less than 10% of the maximum allowable working pressure of the roof.  
[District Rule 463]
9. All openings in the tank roof shall be equipped with a projection, which extends below the liquid surface.  
[District Rule 463]
10. Roof drains shall be equipped with slotted membrane fabric cover, or equivalent, which covers at least 90% of the drain area.  
[District Rule 463]
11. The owner/operator shall maintain an operations log for each day's operations (from midnight to midnight) which shall include, as a minimum, the following information. This log shall be kept current and on-site (or at a central location) for a minimum of five (5) years, and shall be provided to District, State and Federal personnel upon request:

- a. The aggregated total amount of petroleum products transferred from the supplying pipelines and tanker trucks into all storage tanks combined, by product type and CAS, in gallons;
  - b. Average volume of petroleum products stored onsite;
  - c. Storage and transfer temperatures of petroleum products, in degrees Fahrenheit;
  - d. Monthly summary of incoming and outgoing petroleum product throughput, in gallons;
  - e. Running consecutive twelve (12) month summary of incoming and outgoing petroleum product throughput, in gallons;
  - f. Records of all primary and secondary seal inspections;
  - g. Records of all maintenance or repairs to the tank and to the primary and secondary seals, including the dates and times any temporary vapor control equipment was employed, such as mobile degassing equipment;
  - h. Records of all tank emptyings and refillings; and
  - i. Records of the occurrence and duration of each malfunction of operation and what corrective actions were taken to minimize emissions.
- [40 CFR 70.6(a)(3)(ii)(b), District Rule 463]

**CONDITIONS APPLICABLE TO FIXED ROOF STORAGE TANK T000726:**

1. This equipment shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles in a manner consistent with good air pollution control practice for minimizing emissions. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.  
[40 CFR 63.11085, District Rule 1302(C)(2)(a)]
2. The maximum True Vapor Pressure (TVP) of organic liquids stored in this tank shall not exceed 11.0 psia (75.9 kPa) under storage conditions.  
[40 CFR 60.112b, District Rule 463(C)(1)(a)(viii)]
3. This storage tank must be vented to the fully functional and properly operating air pollution control equipment operating under valid District Permit C000106.  
[District Rules 1303 and 1320]
4. The owner/operator shall maintain an operations log for each day's operations (from midnight to midnight) which shall include, as a minimum, the following information. This log shall be kept current and on-site (or at a central location) for a minimum of five (5) years, and shall be provided to District, State and Federal personnel upon request:
  - a. The aggregated total amount of petroleum products transferred from the supplying pipelines and tanker trucks into all storage tanks combined, by product type and CAS, in gallons;
  - b. Average volume of petroleum products stored onsite;

- c. Storage and transfer temperatures of petroleum products, in degrees Fahrenheit;
  - d. Monthly summary of incoming and outgoing petroleum product throughput, in gallons;
  - e. Running consecutive twelve (12) month summary of incoming and outgoing petroleum product throughput, in gallons;
  - f. Records of all maintenance or repairs to the tank;
  - g. Records of all tank emptyings and refillings; and
  - h. Records of the occurrence and duration of each malfunction of operation and what corrective actions were taken to minimize emissions.
- [40 CFR 70.6(a)(3)(ii)(b), District Rule 463]

**CONDITIONS APPLICABLE TO FIXED ROOF STORAGE TANK T000727:**

1. This equipment shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles in a manner consistent with good air pollution control practice for minimizing emissions. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.  
[40 CFR 63.11085, District Rule 1302(C)(2)(a)]
2. The maximum True Vapor Pressure (TVP) of organic liquids stored in this tank shall not exceed 4.0 psia (27.6 kPa) under storage conditions.  
[40 CFR 60.112b]
3. This storage tank's conservation-type vent must be fully functional and properly operating whenever organic liquids are being stored.  
[District Rules 1303 and 1320]
4. The owner/operator shall maintain an operations log for each day's operations (from midnight to midnight) which shall include, as a minimum, the following information. This log shall be kept current and on-site (or at a central location) for a minimum of five (5) years, and shall be provided to District, State and Federal personnel upon request:
  - a. The aggregated total amount of petroleum products transferred from the supplying pipelines and tanker trucks into all storage tanks combined, by product type and CAS, in gallons;
  - b. Average volume of petroleum products stored onsite;
  - c. Storage and transfer temperatures of petroleum products, in degrees Fahrenheit;
  - d. Monthly summary of incoming and outgoing petroleum product throughput, in gallons;
  - e. Running consecutive twelve (12) month summary of incoming and outgoing petroleum product throughput, in gallons;
  - f. Records of all maintenance or repairs to the tank;

- g. Records of all tank emptyings and refillings; and
  - h. Records of the occurrence and duration of each malfunction of operation and what corrective actions were taken to minimize emissions.
- [40 CFR 70.6(a)(3)(ii)(b), District Rule 463]

## **E. Conclusion**

The District has reviewed the proposed application for renewing Calnev Pipe Line, LLC - Barstow Terminal's FOP and conducted a succinct written analysis as required District Rule 1203, section (B)(1)(a). The District has determined that the proposed FOP is in compliance with all applicable District, state, and federal rules and regulations when operated in terms of the permit conditions given below and the attached revised FOP. This Document, inclusive of the preliminary determination and statement of legal and factual basis (pursuant to District Rule 1203) was released for public comment and publicly noticed pursuant to District Rule 1207 (please see Appendix D).

## **F. Public Comment and Notifications**

### ***1. Public Comment***

This preliminary determination will be publicly noticed on November 16, 2017. Please see Appendix D for noticing details.

### ***2. Notifications***

The preliminary determination was submitted to USEPA and CARB pursuant to District Rule 1205 for a forty-five (45) day review period on November 15, 2017. The final renewed FOP shall be issued on or about January 1, 2018.

Director, Office of Air Division  
United States EPA, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Chief, Stationary Source Division  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

Juziel Picado & Yijin Wang  
Specialists – Permitting Compliance  
Calnev Pipe Line, LLC  
1100 Town & Country Rd  
Orange, CA 92868

Appendix A  
Calnev Pipe Line, LLC - Barstow Terminal Application

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# Mojave Desert Air Quality Management District

## TITLE V PERMIT RENEWAL APPLICATION – GENERAL FACILITY INFORMATION

1. FACILITY ID: _____		FACILITY SIC CODE: <u>4226</u>	
TITLE V PERMIT NUMBER: <u>0200353</u>		PERMIT EXPIRATION DATE: <u>March 12, 2016</u>	
2. COMPANY NAME: <u>Calnev Pipe Line, LLC – Barstow Terminal</u>			
3. COMPANY MAILING ADDRESS:			
STREET/P.O. BOX: <u>1100 Town &amp; Country Road</u>		9-DIGIT	
CITY: <u>Orange</u>	STATE: <u>CA</u>	ZIP CODE:	<u>92868</u>
4. FACILITY NAME: _____			
5. FACILITY MAILING ADDRESS:			
STREET/P.O. BOX: <u>34277 Daggett-Yermo Road</u>		9-DIGIT	
CITY: <u>Daggett</u>	STATE: <u>CA</u>	ZIP CODE:	<u>92327</u>
6. RESPONSIBLE OFFICIAL (AS DEFINED IN 40 CFR 70.2 AND MDAQMD RULE 1201)			
NAME: <u>Philip L. Vasquez</u>		TITLE: <u>Director of Operations</u> PHONE NUMBER <u>909-873-5123</u>	
7. TITLE V PERMIT CONTACT PERSON			
NAME: <u>Yijin Wang</u>		TITLE: <u>Manager, Air</u> PHONE NUMBER <u>909-560-4886</u>	
8. TYPE OF ORGANIZATION:			
<input checked="" type="checkbox"/> CORPORATION <input type="checkbox"/> SOLE OWNERSHIP <input type="checkbox"/> GOVERNMENT <input type="checkbox"/> PARTNERSHIP <input type="checkbox"/> UTILITY			
9. CAM (COMPLIANCE ASSURANCE MONITORING) PLANS			
Are you required to submit a CAM plan for any emissions unit at this facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
If yes, submit a CAM plan for each emissions unit as an attachment to the application. See attached CAM plan instructions for more detail.			

10. ALTERNATE OPERATING SCENARIOS

Does this application request alternative operating scenarios pursuant to Rule 1203(E)? ☐ Yes ☒ No

If yes, submit an Alternate Operating Scenarios form, as applicable.

11. RISK MANAGEMENT PLAN

Has this facility been required to prepare a federal Risk Management Plan pursuant to Section 112(r) of the federal Clean Air Act and 40 CFR Part 68? ☐ Yes ☒ No

If yes, has the federal Risk Management Plan been submitted to the implementing agency? ☐ Yes ☐ No

If a federal Risk Management Plan is required but has not been submitted to the implementing agency, provide a detailed explanation as an attachment to the application.

12. STRATOSPHERIC OZONE

Does the facility conduct any activities that are regulated by the federal protection of stratospheric ozone requirements in 40 CFR Part 82? ☐ Yes ☒ No

13. ACID RAIN

Is this facility subject to the acid rain requirement in 40 CFR Part 72 through 40 CFR Part 78? ☐ Yes ☒ No

14. MAJOR SOURCE STATUS

Is this facility a major source of greenhouse gases, as defined in MDAQMD Rule 1211? ☐ Yes ☒ No

Is this facility a major source of any of the following pollutants:

☒ VOCs ☐ Particulate Matter ☐ Carbon Monoxide ☐ Nitrogen Oxides ☐ Sulfur Dioxides  
☐ Lead ☐ HAP

15. PERMIT SHIELDS


Does the current Title V permit for this facility include any permit shields? ☐ Yes ☒ No

If yes, is the basis for each permit shield still correct? ☐ Yes ☐ No

If the current Title V permit contains any permit shield for which the basis is no longer correct, provide a detailed explanation as an attachment to the application. If you are requesting an additional permit shield, complete the attached Permit Shield Request form.

16. CERTIFICATION BY RESPONSIBLE OFFICIAL

Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete. I declare, under penalty of perjury under the laws of the state of California, that the foregoing is correct and true:

Signature: 

Date: 7-30-15

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661



# Mojave Desert Air Quality Management District

## TITLE V PERMIT RENEWAL APPLICATION – APPLICATION CERTIFICATION

### I. FACILITY INFORMATION

1. FACILITY NAME: Calnev Pipe Line, LLC – Barstow Terminal
2. FACILITY ID:
3. TITLE V PERMIT #: 0200353

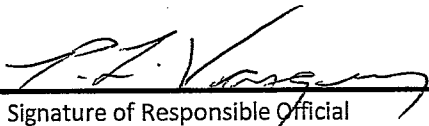
### II. TITLE V PERMIT CERTIFICATION (Read each statement carefully and check one):

- ☐ The current Title V permit has been reviewed and it has been determined that equipment descriptions are correct, and all requirements are still applicable.
- ☒ The current Title V permit has been reviewed and errors have been found in equipment descriptions and/or permit requirements. A copy of the Title V permit is attached with redline changes. Permit application and/or modification forms are enclosed, as applicable.

### III. COMPLIANCE CERTIFICATION (Read each statement carefully and check all for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s), except for those requirements listed in the "Title V Non-Compliant Operations Report".
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis, except for those requirements listed in the "Title V Non-Compliant Operations Report".
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete. I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true.

  
Signature of Responsible Official

7-30-15  
Date

Philip L. Vasquez  
Name of Responsible Official (please print)

Director or Operations  
Title of Responsible Official (please print)

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

# Mojave Desert Air Quality Management District

## TITLE V PERMIT RENEWAL APPLICATION – NON-COMPLIANT OPERATIONS (DEVIATIONS) REPORT AND PART 70 COMPLIANCE SCHEDULE/PLAN AND QUALITY IMPROVEMENT PLAN - QIP

### I. FACILITY INFORMATION

1. FACILITY NAME: <u>Calnev Pipe Line, LLC – Barstow Terminal</u>	2. FACILITY ID _____	3. PERMIT NUMBER <u>0200353</u>
--	-------------------------	------------------------------------

### II. NON-COMPLIANT OPERATIONS REPORT

4. Compliance status:			
a. <input type="checkbox"/> This facility has experienced non-compliant operations as described below but achieved compliance with the applicable requirements on _____			
b. <input type="checkbox"/> This facility continues to experience non-compliance with the applicable requirements as described below:			
5. PERMIT # OF EQUIPMENT	6. APPLICABLE REQUIREMENT (Rule or Permit Condition Number)	7. FEDERALLY ENFORCEABLE REQUIREMENT?	8. DESCRIPTION OF NON-COMPLIANT OPERATIONS (Attach additional sheets as needed)
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	

### III. PART 70 COMPLIANCE SCHEDULE/PLAN AND QIP

9. DESCRIBE HOW COMPLIANCE WAS OR WILL BE ACHIEVED	10. COMPLIANCE SCHEDULE	
	DATE	REMEDIAL MEASURES AND MILESTONES

### IV. PROGRESS REPORT SCHEDULE

11. CERTIFIED PROGRESS REPORTS WILL BE SUBMITTED ACCORDING TO THE FOLLOWING SCHEDULE: (CHECK a or b and complete c):				
a. <input type="checkbox"/> Semi-annually	b. <input type="checkbox"/> More frequently as specified	c. Submittal dates: 1) _____ 2) _____ 3) _____ 4) _____		

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# Mojave Desert Air Quality Management District

## TITLE V PERMIT RENEWAL APPLICATION – LIST OF EXEMPT EQUIPMENT

### I. FACILITY INFORMATION

1. FACILITY NAME: Calnev Pipe Line, LLC – Barstow Terminal
2. FACILITY ID:
3. TITLE V PERMIT #: 0200353

### II. SUMMARY OF EQUIPMENT EXEMPT FROM PERMIT REQUIREMENTS (INCLUDING PORTABLE)

4. EXEMPT EQUIPMENT DESCRIPTION	5. VENTING TO CONTROL (PERMIT #)	6. CONTROL DEVICE DESCRIPTION	7. BASIS FOR EXEMPTION (e.g. Rule 219(D)(2)(b))
Additive Tank1			Rule 219(D)(1)(a)
Additive Tank2			Rule 219(D)(1)(a)
Red Dye Additive Tank			Rule 219(D)(1)(a)
MCC Lubricity Tank			Rule 219(D)(1)(a)
Prover			Rule 219(D)(1)(a)
Evaporation pond (OOS)			Rule 219(D)(1)(a)
Oil/Water Separator			Rule 219(D)(1)(a)
Vapor Bladder			Rule 219(D)(1)(a)
Sump			Rule 219(D)(1)(a)
Abrasive Blasting			Rule 219(E)(6)
Architectural Surface Coatings			Rule 219(E)(13)(v)
Solvent Cleaning			Rule 219(E)(13)(j)

# Mojave Desert Air Quality Management District

## TRIVIAL ACTIVITIES

- Combustion emissions from propulsion of mobile sources
- Air-conditioning units used for human comfort that do not have applicable requirements under Title VI of the Act.
- Ventilating units used for human comfort that do not exhaust air pollutant into the ambient air from any manufacturing/industrial or commercial process
- Non-commercial food preparation
- Consumer use of office equipment and products, not including printers or businesses primarily involved in photographic reproduction
- Janitorial services and consumer use of janitorial products
- Internal combustion engines used for landscaping purposes
- Laundry activities, except for dry-cleaning and steam boilers
- Bathroom/toilet vent emissions
- Emergency (backup) electrical generators at residential locations
- Tobacco smoking rooms and areas
- Blacksmith forges
- Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. Asphalt batch plant owners/operators must still get a permit if otherwise required.
- Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
- Portable electrical generators <50 HP that can be moved by hand from one location to another. Moved by hand means it can be moved without the assistance of any motorized or non-motorized vehicle, conveyance or device
- Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal, or plastic
- Brazing, soldering and welding equipment, and cutting torches related to manufacturing and construction activities that do not result in emission of HAP metals.
- Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as unpermitted equipment.
- Routine calibration and maintenance of laboratory equipment or other analytical instruments.
- Equipment used for quality control/assurance or inspection purposes, including sampling equipment used to withdraw materials for analysis
- Hydraulic and hydrostatic testing equipment
- Environmental chambers not using HAP gases
- Shock chambers
- Humidity chambers

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- Solar simulators
- Fugitive emission related to movement of passenger vehicles, provided any required fugitive dust control plan or its equivalent is submitted
- Process water filtration systems and demineralizers
- Demineralized water tanks and demineralizer vents, air compressors and pneumatically operated equipment, including hand tools
- Batteries and battery charging stations, except at battery manufacturing plants
- Storage tanks, vessels and containers holding or storing liquid substances that will not emit any VOC or HAP
- Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized
- Equipment used to mix and package soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.
- Drop hammers or hydraulic presses for forging or metalworking
- Equipment used exclusively to slaughter animals, but not including other equipment at slaughterhouses, such as rendering cookers, boilers, heating plants, incinerators, and electrical power generating equipment
- Vents from continuous emissions monitors and other analyzers
- Natural gas pressure regulator vents, excluding venting at oil and gas production facilities
- Hand-held applicator equipment for hot melt adhesives with no VOC in the adhesive formulation
- Equipment used for surface coating, painting, dipping or spraying operations, except those that will emit VOC or HAP
- CO2 lasers, used only on metals and other materials which do not emit HAP in the process
- Consumer use of paper trimmers/binders
- Electric or steam-heated drying ovens and autoclaves, but not the emissions from the articles or substance being processed in the ovens or autoclaves or the boilers delivering the steam
- Salt baths using nonvolatile salts that do not result in emissions of any regulated air pollutants
- Laser trimmers using dust collection to prevent fugitive emissions
- Boiler water treatment operations, not including cooling towers
- Oxygen scavenging (de-aeration) of water
- Ozone generators
- Fire suppression systems
- Emergency road flares
- Steam vents and safety relief valves
- Steam leaks
- Steam cleaning operations
- Steam sterilizers

# Mojave Desert Air Quality Management District

## TITLE V PERMIT RENEWAL APPLICATION – POTENTIAL EMISSIONS REPORT, CRITERIA POLLUTANTS & HAPs

### I. FACILITY INFORMATION

1. FACILITY NAME:	Calnev Pipe Line, LLC - Barstow Terminal
2. FACILITY ID:	
3. TITLE V PERMIT #:	200353

### II. POTENTIAL ANNUAL EMISSIONS

4. EMISSION UNIT (APPLICATION OR PERMIT #)	5. EQUIPMENT DESCRIPTION	6. POTENTIAL ANNUAL EMISSIONS												
		NOx (TPY)	VOC (TPY)	PM10 (TPY)	PM2.5 (TPY)	SOx (TPY)	CO (TPY)	2,2,4 Trimethyl pentane (TPY)	Benzene (TPY)	Ethyl Benzene (TPY)	Hexane (TPY)	PAHs (TPY)	Toluene (TPY)	Xylenes (TPY)
B000105	Loading Rack (Fugitive Emissions)		15.59					1.22E-01	1.37E-01	1.52E-02	2.44E-01	7.62E-03	1.98E-01	7.62E-02
B000728	Loading Rack (Fugitive Emissions)													
B008639	Ethanol Offloading Rack		2.88					1.15E-03	1.30E-03	1.44E-04	2.30E-03	7.20E-05	1.87E-03	7.20E-04
C000106	Vapor Combustion Unit	8.66	15.24	0.27	0.27	0.01	1.46	1.22E-01	1.37E-01	1.52E-02	2.44E-01	7.62E-03	1.98E-01	7.62E-02
	Vapor Combustion Unit (Supplemental Fuel)	0.19	0.01	0.01	0.01	0.00	0.03		5.31E-06	6.31E-06	4.21E-06	3.66E-07	2.43E-05	1.80E-05
T000096	BW-330 (Breathing Loss)		0.78					6.21E-03	6.99E-03	7.77E-04	1.24E-02	3.88E-04	1.01E-02	3.88E-03
T000097	BW-331 (Breathing Loss)		1.34					1.07E-02	1.21E-02	1.34E-03	2.15E-02	6.70E-04	1.74E-02	6.70E-03
T000098	BW-332 (Breathing Loss)		3.72					2.98E-02	3.35E-02	3.72E-03	5.95E-02	1.86E-03	4.84E-02	1.86E-02
T000099	BW-333 (Breathing Loss)		1.56					2.98E-02	3.35E-02	3.72E-03	5.95E-02	1.86E-03	4.84E-02	1.86E-02
T000100	BW-334 (Breathing Loss)		2.82					2.26E-02	2.54E-02	2.82E-03	4.51E-02	1.41E-03	3.67E-02	1.41E-02
T000101	BW-335 (Breathing Loss)		1.39					1.11E-02	1.25E-02	1.39E-03	2.22E-02	6.94E-04	1.81E-02	6.94E-03
T000102	BW-325 (Breathing Loss)		2.90					2.32E-02	2.61E-02	2.90E-03	4.64E-02	1.45E-03	3.77E-02	1.45E-02
T000103	BW-321 (Breathing Loss)		1.59					1.27E-02	1.43E-02	1.59E-03	2.55E-02	7.97E-04	2.07E-02	7.97E-03
T000104	BW-322 (Breathing Loss)		0.02					0.00E+00	0.00E+00	0.00E+00	1.47E-03	0.00E+00	0.00E+00	0.00E+00
T000104	BW-322 (Working Loss)		0.88					0.00E+00	0.00E+00	0.00E+00	7.96E-02	0.00E+00	0.00E+00	0.00E+00
T000723	BW-320 (Breathing Loss)		2.96					2.37E-02	2.67E-02	2.96E-03	4.74E-02	1.48E-03	3.85E-02	1.48E-02
T000724	BW-323 (Breathing Loss)		3.27					2.62E-02	2.94E-02	3.27E-03	5.23E-02	1.63E-03	4.25E-02	1.63E-02
T000725	BW-324 (Breathing Loss)		1.83					1.47E-02	1.65E-02	1.83E-03	2.94E-02	9.17E-04	2.39E-02	9.17E-03
T000096	BW-321 (Worst Case Working Loss for Tanks)		1.06					1.27E-02	1.43E-02	1.59E-03	2.55E-02	7.97E-04	2.07E-02	7.97E-03
T000726	BW-300 (Vent to VCU)		0.01											
T000727	BW-301 Additive Tank		0.03					2.58E-07		1.03E-02		5.41E-04		1.03E-02
	BW-331A BP Additive		0.00							3.70E-05				
	BW-332A Chevron Additive		0.02											
	BW-323A Red Dye Additive		0.02							4.98E-04				2.57E-03
	BW-302 MCC Lubricity		0.02											
90001	Fugitive Emissions - Pump Seals		0.10					8.01E-04	9.01E-04	1.00E-04	1.60E-03	0.00E+00	1.30E-03	5.01E-04
90002	Fugitive Emissions - Valves		0.27					2.16E-03	2.43E-03	2.70E-04	4.32E-03	0.00E+00	3.51E-03	1.35E-03
90003	Fugitive Emissions - Fittings (Connectors & Flanges)		0.04					3.50E-04	3.94E-04	4.38E-05	7.00E-04	0.00E+00	5.69E-04	2.19E-04
90004	Fugitive Emissions - Other (Compressors & Others)		0.61					4.92E-03	5.53E-03	6.15E-04	9.84E-03	0.00E+00	7.99E-03	3.07E-03
90005	Fugitive Emissions - Open Ended Lines		0.00					0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
	Evaporation Pond (OOS)		0.36					2.87E-03	3.23E-03	3.59E-04	5.75E-03	1.80E-04	4.67E-03	1.80E-03
	Prover		0.09					7.01E-04	7.89E-04	8.77E-05	1.40E-03	4.38E-05	1.14E-03	4.38E-04

#### Notes:

Emissions associated with the equipment are for the calculation of the facility potential to emit. Emissions listed above should not be considered as emission limits for each equipment.

# Mojave Desert Air Quality Management District

## TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING APPLICABILITY DETERMINATION FORM

### I. FACILITY INFORMATION

1. FACILITY NAME: Calnev Pipe Line, LLC – Barstow Terminal
2. FACILITY ID:
3. TITLE V PERMIT #: 0200353

### II. CAM STATUS SUMMARY FOR EMISSION UNITS

4. Based on the criteria in the instructions (check one and attach additional pages as necessary):						
a. <input type="checkbox"/> There are no emission units with control devices at this Title V facility.						
b. <input checked="" type="checkbox"/> There are emission units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM plan is attached for each affected emissions unit.						
5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON FOR EXEMPTION)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
B000105	Loading Rack #1	VOC	See Appendix B			Yes, See Appendix G
B000728	Loading Rack #2	VOC				
T000726	Tank No. 300	VOC				
T000727	Tank No. 301	VOC				

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## Appendix B

### Facility 2016 CEIR Prioritization Score

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File name: \\nas02\Private Docs\GuyS\My Documents\Permit Apps TITLE V Applications\CALNEV Barstow Terminal\Calnev Barstow Prioritization Score\_\_2016 CEIR.rtf

## HARP Facility Prioritization Report

HARP EIM Version: 2.0.8

Reporting Year: 2014  
Project Path: C:\Users\guys\Desktop\2016 Emission Inventories  
Project Database: \\nas02\public docs\Permit Engineering\Emission Inventory\2014\_CEIP&CEIR\MK2014 (2) .mdb  
CEIDARS Utility Database: C:\HARP2\Tables\CEIDARSTables022016.mdb  
HARP Health Talbe: HEALTH201603  
Sorting Order: DIS, AB, CO, TS, FACID, POLABBREV  
Date Created: 4/28/2017 1:04:57 PM  
Operator: GES

\*\*\*\*\*

### POLLUTANT HEALTH VALUES FROM HARP HEALTH DATABASE:

-----

POLLUTANT ID	POLLUTANT	CANCERURF (INH) (ug/m^3)^-1	ACUTEREL ug/m^3	CHRONICREL (INH) ug/m^3
57976	7,12-DB[a]anthr	7.10E-02	N/A	N/A
75070	Acetaldehyde	2.70E-06	4.70E+02	1.40E+02
107028	Acrolein	N/A	2.50E+00	3.50E-01
7440382	Arsenic	3.30E-03	2.00E-01	1.50E-02
71432	Benzene	2.90E-05	2.70E+01	3.00E+00
7440417	Beryllium	2.40E-03	N/A	7.00E-03
7440439	Cadmium	4.20E-03	N/A	2.00E-02
74828	CH4	N/A	N/A	N/A
42101	CO	N/A	N/A	N/A
50000	Formaldehyde	6.00E-06	5.50E+01	9.00E+00
7439965	Manganese	N/A	N/A	9.00E-02
78933	MEK	N/A	1.30E+04	N/A
67561	Methanol	N/A	2.80E+04	4.00E+03
7440020	Nickel	2.60E-04	2.00E-01	1.40E-02
10024972	Nitrogen oxide	N/A	N/A	N/A
42603	NOX	N/A	N/A	N/A
11101	PM	N/A	N/A	N/A
11101	PM	N/A	N/A	N/A
85101	PM10	N/A	N/A	N/A
85101	PM10	N/A	N/A	N/A
88101	PM25	N/A	N/A	N/A
88101	PM25	N/A	N/A	N/A
16113	ROG	N/A	N/A	N/A
16113	ROG	N/A	N/A	N/A
42401	SOX	N/A	N/A	N/A
43101	TOG	N/A	N/A	N/A
43101	TOG	N/A	N/A	N/A
43104	VOC	N/A	N/A	N/A

\*\*\*\*\*

### MULTIPATHWAY POLLUTANTS ADJUSTMENT FACTORS OTHER THAN 1:

-----

None.

\*\*\*\*\*

PRIORITIZATION SCORE SUMMARY:  
-----

Facility Name  
Proximity Method  
Optional Factors

FACID	CO	AB	DIS	Emission and Potency Procedure				Dispersion Adjustment Procedure				Highest
				Cancer	Acute	Chronic	NonCancer	Cancer	Acute	Chronic	NonCancer	Score

MK MAGNETICS

Proximity Method:

Annual Operating Hours 8760

151602583	36	MD	MOJ	0.24	0.00E+00	2.06E-02	2.06E-02	0.24	0.00E+00	2.06E-02	2.06E-02	0.24
-----------	----	----	-----	------	----------	----------	----------	------	----------	----------	----------	------

\*\*\*\*\*

PRIORITIZATION SCORES AND POLLUTANTS: (For proximity method or optional factors information, please see section above.)  
-----

Note: 1. Annual Emissions units: LBS/YR for toxics, TONS/YR for criteria pollutants, CURIES/YR for radionuclides.

2. Hourly Maximum Emissions units: LBS/HR for toxics, MILLICURIES/HR for radionuclides.

3. \* GHGs, non-regulatory pollutants, and user defined pollutants are marked by an asterisk with the pollutant ID.  
These pollutants are not included in the prioritization score calculation.

Facility Name	Emission and Potency Procedure				Dispersion Adjustment Procedure				Highest			
FACID	CO	AB	DIS	Cancer	Acute	Chronic	NonCancer	Cancer	Acute	Chronic	NonCancer	Score

MK MAGNETICS

Annual Operating Hours: 8760

151602583	36	MD	MOJ	0.24	0.00E+00	2.06E-02	2.06E-02	0.24	0.00E+00	2.06E-02	2.06E-02	0.24
-----------	----	----	-----	------	----------	----------	----------	------	----------	----------	----------	------

Pollutant	POL ID	POLLUTANT	ANNUAL	EMS	HR	MAX	EMS
	57976	7,12-DB[a]		0.0			0.0
	75070	Acetaldehy		2.429E-02			0.0
	107028	Acrolein		1.822E-03			0.0
	7440382	Arsenic		0.0			0.0
	71432	Benzene		4.858E-02			0.0
	7440417	Beryllium		0.0			0.0
	7440439	Cadmium		6.072E-03			0.0
	74828	CH4		13.966			0.0
	42101	CO		0.255			0.0
	50000	Formaldehy		0.103			0.0
	7439965	Manganese		0.0			0.0
	78933	MEK		9.300			0.0
	67561	Methanol		0.910			0.0
	7440020	Nickel		1.214E-02			0.0
	10024972	Nitrogen O		13.358			0.0
	42603	NOX		0.304			0.0
	11101	PM		2.456E-02			0.0
	85101	PM10		2.397E-02			0.0
	88101	PM2.5		2.375E-02			0.0
	16113	ROG		0.563			0.0
	42401	SOX		1.822E-03			0.0
	43101	TOG		1.491			0.0
	43104	VOC		0.546			0.0

## Appendix C

### Facility 2016 CEIR Emission Summary

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File name: C:\Users\guys\Desktop\2016 Emission Inventories\Emissions Summary Calnev Barstow Terminal.rtf

## HARP Facility Emission Summary

HARP EIM Version: 2.0.8

Project Path: C:\Users\guys\Desktop\2016 Emission Inventories  
Project Database: \\nas02\public docs\Permit Engineering\Emission Inventory\2014\_CEIP&CEIR\MK2014(2).mdb  
CEIDARS Utility Database: C:\HARP2\Tables\CEIDARSTables022016.mdb  
Facility List: N/A  
Pollutant List: N/A  
Sorting Order: FACID, CO, AB, DIS, YEAR, TOXAPPEN, POLABBREV  
Date Created: 4/28/2017 1:22:15 PM  
Operator: GES

(Note: Emissions in LBS/YR for toxics, TONS/YR for criteria pollutants, CURRIES/YR for radio nuclides. \* User defined pollutants are marked by an asterisk with the pollutant ID.)

FACILITY	NAME	FSIC										
-----												
ADDRESS												
-----												
CITY	ZIP	CO	AB	DIS	CATEGORY	HAP	POLLUTANT	POLLUTANT ID	EMISSIONS	YEAR		
-----												
200353	BARSTOW TERMINAL											
	34277 DAGGETT-YERMO ROAD	4226										
	DAGGETT	92327	36	MD	MOJ	A-I	Barium	7440393	8.656E-05	2016		
						A-I	Copper	7440508	1.672E-05	2016		
						A-I	Cyclohexane	110827	4.144	2016		
						A-I	DiClBenzenes	25321226	2.361E-05	2016		
						A-I	Propylene	115071	1.043E-02	2016		
						A-I	Vanadium	7440622	4.526E-05	2016		
						A-I	Zinc	7440666	5.706E-04	2016		
						A-I	Y 2,2,4TriMePentn	540841	117.359	2016		
						A-I	Y 3-MeCholanthren	56495	3.541E-08	2016		
						A-I	Y 7,12-DB[a]anthr	57976	3.148E-07	2016		
						A-I	Y Acenaphthene	83329	3.541E-08	2016		
						A-I	Y Acenaphthylene	208968	3.541E-08	2016		
						A-I	Y Acetaldehyde	75070	6.100E-05	2016		
						A-I	Y Acrolein	107028	5.313E-04	2016		
						A-I	Y Anthracene	120127	4.721E-08	2016		
						A-I	Y Arsenic	7440382	3.935E-06	2016		
						A-I	Y B[a]anthracene	56553	3.541E-08	2016		
						A-I	Y B[a]P	50328	3.148E-08	2016		
						A-I	Y B[b]fluoranthen	205992	3.541E-08	2016		
						A-I	Y B[g,h,i]perylene	191242	3.148E-08	2016		
						A-I	Y B[k]fluoranthen	207089	3.541E-08	2016		
						A-I	Y Benzene	71432	67.063	2016		
						A-I	Y Beryllium	7440417	2.361E-07	2016		
						A-I	Y Cadmium	7440439	2.165E-05	2016		
						A-I	Y Chrysene	218019	3.541E-08	2016		
						A-I	Y Cobalt	7440484	1.653E-06	2016		
						A-I	Y Cr (VI)	18540299	2.754E-05	2016		
						A-I	Y D[a,h]anthracen	53703	3.148E-08	2016		
						A-I	Y Ethyl Benzene	100414	20.929	2016		
						A-I	Y Fluoranthene	206440	3.157E-08	2016		
						A-I	Y Fluorene	86737	5.508E-08	2016		
						A-I	Y Formaldehyde	50000	2.419E-04	2016		
						A-I	Y Hexane	110543	272.012	2016		
						A-I	Y In[1,2,3-cd]pyr	193395	3.541E-08	2016		
						A-I	Y Lead cmp(inorg)	1128	5.261E-06	2016		
						A-I	Y Manganese	7439965	7.476E-06	2016		
						A-I	Y Mercury	7439976	5.115E-06	2016		

A-I	Y	Naphthalene	91203	0.219	2016
A-I	Y	Nickel	7440020	4.132E-05	2016
A-I	Y	PAHs-w/	1150	7.583	2016
A-I	Y	Phenanthrene	85018	3.345E-07	2016
A-I	Y	Pyrene	129000	9.836E-08	2016
A-I	Y	Selenium	7782492	4.721E-07	2016
A-I	Y	Toluene	108883	184.422	2016
A-I	Y	Xylenes	1330207	71.226	2016
Crit		CO	42101	0.930	2016
Crit		NOX	42603	0.221	2016
Crit		PM	11101	6.315E-03	2016
Crit		SOX	42401	2.833E-04	2016
Crit		TOG	43101	9.487	2016



## Appendix D

### Public Notice

*Noticing Methods include the following, in accordance with District Rule 1207 (A)(1)(a):*

- Published in newspapers of general circulation - *Riverside Press Enterprise* (Riverside County) and the *Daily Press* (San Bernardino County) on Wednesday, November 15, 2017.
- Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notices in this Appendix) on Wednesday, November 15th, 2017.
- Posted on the MDAQMD Website at the following link:  
<http://www.mdaqmd.ca.gov/index.aspx?page=416>

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<u>Ad Number</u>	<u>Ad Size</u>	<u>Color</u>
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<u>External Ad Number</u>		<u>Pick Up</u>

#### NOTICE OF PRELIMINARY DETERMINATION

NOTICE IS HEREBY GIVEN THAT Calnev Pipe Line, LLC - Barstow Terminal, (Calnev Barstow) located at 34277 Daggett-Yermo Road, in Daggett, California has submitted an application to renew their Federal Operating Permit (0200353) pursuant to the provisions of the Mojave Desert Air Quality Management District (MDAQMD) Regulation XII. Calnev Barstow is a Bulk Fuel Terminal for Hire. This proposed renewal does not incorporate any additional capabilities or result in any increase in regulated air pollutants.

**REQUEST FOR COMMENTS:** Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed renewal of Calnev Barstow's Federal Operating Permit. If you submit written comments, you may also request a public hearing on the proposed renewal of the Federal Operating Permit. To be considered, comments, documents and requests for public hearing must be submitted no later than 5:00 P.M. on December 15th, 2017, to the MDAQMD, at the address listed below.

**PETITION FOR REVIEW:** Federal Operating Permits are also subject to review and approval by USEPA. If USEPA has not objected to a proposed permit, and the MDAQMD has not addressed a public comment in a satisfactory manner, the public may petition USEPA, Region IX, Operation Permits Section at 75 Hawthorne Street, San Francisco, CA 94105 within 60 days after the end of the USEPA review period for USEPA to reconsider its decision not to object to the permit.

**AVAILABILITY OF DOCUMENTS:** The proposed Federal Operating Permit, as well as the application and other supporting documentation are available for review at the MDAQMD offices, 14306 Park Avenue, Victorville, CA 92392. In addition, these documents are available on the MDAQMD website and can be viewed at following link: <http://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry>. Please contact Sheri Haggard, Permit Engineering Supervisor, at the address, above, or (760) 245-1661, extension 1864, or at [shaggard@mdaqmd.ca.gov](mailto:shaggard@mdaqmd.ca.gov) for additional questions pertaining to this action and/or corresponding documents.

\*Traducción en español esta disponible por solicitud. Por favor llame: (760) 245-1661 x1864\*

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