

**SFPP, L.P. TUCSON TERMINAL**  
**AIR QUALITY PERMIT 1674**

**TECHNICAL SUPPORT DOCUMENT**

**I. General Comments:**

**A. Company Information**

1. SFPP, L.P.
2. Source Address: 3841 E. Refinery Way, Tucson, AZ 85713  
Mailing Address: 1001 Louisiana Street, Houston, TX 77002

**B. Background**

SFPP, L.P. Tucson Terminal (SFPP) is a bulk fuel products distribution terminal with storage tanks, loading racks and other associated equipment (including air pollution control equipment). The terminal receives petroleum fuel products via pipeline or truck, and blends products with additives and oxygenates prior to distribution. The final fuel is loaded into truck cargo tanks. Petroleum products are received directly via an interstate pipeline originating in Texas. Ethanol (an oxygenating additive) may be received by railcar or truck while other additives are typically received by truck. The terminal does not process any incoming materials and is thus not classified as a refinery.

SFPP may add customer or supplier specific additives at the time that products are dispensed at the loading racks. Materials and products handled at the terminal are various grades of gasoline, diesel, transmix, aviation fuels, ethanol (an oxygenating additive), and other customer-specific proprietary and generic fuel additives. The terminal operates continuously in all phases described therefore loading racks are available for customer trucks on a 24/7 basis.

On June 4, 2018 PDEQ received a minor permit revision application to transfer the assets and operations formerly owned and operated by HEP Refining, L.L.C. (Class II Air Quality Permit #5014). The former HEP facility is contiguous to the SFPP, L.P. terminal and includes: 5 multiproduct (gasoline) storage tanks (T-47 – T-51), 1 diesel storage tank (T-46), an Ethanol storage tank (T-52), 4 additive tanks (TA-581, TA-630, TA-640, and TA-314), one loading rack (LR-6) and a ‘NAO’ thermal oxidizer (TO) to control vapors from the loading rack. This is the second acquisition by SFPP, L.P. since issuance of the Title V permit. The HEP Class II air quality permit limited throughput of all storage vessels to 240 million gallons in any 12 consecutive month period. The incorporation of the former HEP assets under this permit does not involve a physical change or change in the method of operation at either facility. With this revision, SFPP, L.P. shall be held to the same synthetic throughput limit that existed in the Class II permit for the former HEP facility. An additional minor permit revision was received on November 13, 2018 to allow SFPP to disconnect the existing NAO TO control device for LR-6 acquired with the former HEP terminal, and reconnect LR-6 to the John Zinc TO control device currently used by SFPP to control emissions from LR’s 1-4. The NAO TO has since been decommissioned and removed from the facility and the John Zinc TO is used exclusively for LR-1 through 4, and LR-6.

Air pollution sources at the facility include point and fugitive emissions sources as a result of the storage, handling, and transfer of fuel and additives into cargo tank trucks, the processing of fuel vapors collected by the loading racks, and from the landing and refilling of 5 “drain-dry” storage tanks at the facility. The facility contains 45 active above ground fuel storage tanks, six truck loading racks, two thermal oxidizers, a vapor recovery system, rail car and truck offloading equipment for denatured alcohol, loading rack off-loading pumps and equipment for off-spec products, a pipe flow meter “prover” system with associated sump, and facility oil/water separator systems.

The facility is a major source of VOC, a synthetic minor source of hazardous air pollutants (HAP), and a true minor source of all other criteria pollutants.

**Table 1: Summary of Permit Actions  
(Within the Previous Permit Term)**

<b>Date Received</b>	<b>Permit Action</b>
07/02/2015	1674-31P: Facility Change w/o Revision Upgrade and Installation of Jet Fuel Filtration system
10/08/2015	1674-32P: Minor Permit Revision Update VRS CAM Plan & Amend T-11 Equipment Description
05/04/2018	1674-0101P. Facility Change w/o Revision Replacement of existing vapor bladder with new one and use of portable vapor bladder while under maintenance repairs.
10/30/2018	1674-0102P. Minor Permit Revision Revision to incorporate adjacent former Holly Energy Partners assets into permit.
11/13/2018	1674-0103P: Facility Change w/o Revision Installation of manways on tank shells and modification of automatic gauge float wells of tanks acquired from former HEP terminal.
11/13/2018	1674-0104P: Facility Change w/o Revision Expansion of drag reducing agent (DRA) skid to accommodate two additional 1,100 gallon DRA tanks
11/13/2018	1674-0105P: Minor Permit Revision Revision to disconnect acquired previous HEP loading rack (LR6) from NAO TO control device and connect to John Zinc TO control device which currently controls LR's 1-4.
12/19/2018	1674-0106P: Facility Change – Gasoline Supply Notification & Emergency per PCC 17.12.040.E
06/05/2019	1674-0107P: Amendment – Mailing Address Change
12/11/2019	1674 – 0108P: Application to renew Air Quality Permit # 1674

**Table 2: Summary of Permit Actions  
(Within the Current Permit Term)**

<b>Date Received</b>	<b>Permit Action</b>
N/A	N/A

**C. Attainment Classification**

SFPP is located in a region that is designated attainment for all criteria pollutants.

**II. Source Description**

**A. Process Description**

SFPP is a bulk fuel terminal that receives petroleum products in 45 active storage vessels (2 are currently out of service) via pipeline and tanker trucks. Petroleum products are then distributed to tanker trucks through loading racks or to manifolds serving adjacent customer's tanks. The facility operates five "drain dry" tanks that receive and store fuel from pipelines entering Arizona from the East and transfer product internally to designated terminal storage tanks. While the five drain dry tanks do not currently distribute fuel products to the loading racks, the Tucson terminal facility can operate to transfer fuel from these tanks to the loading racks and is considered in the emission inventory for the facility. Other products (such as fuel additives and ethanol) are received by tanker trucks and railcars.

The significant air pollutant emitting equipment at the Tucson Terminal consists of the following:

- Forty-five active and two out of service petroleum product aboveground storage tanks including a vapor bladder tank (T-24) associated with one of the vapor collection and control systems at the facility;
- Six truck loading racks equipped with vapor collection and processing capability;
- One John Zink carbon adsorption unit which controls emissions from loading rack LR – 5;
- One John Zink thermal oxidizer unit which controls emissions from loading racks LR – 1 through 4, and LR – 6;
- One pipe flow meter "prover" system with one associated sump;
- Contact water systems consisting of :
  - Four oil/water separators and associated sumps
  - One sump associated with LR – 6
  - Two underground sumps identified as the Wastewater and Transmix sumps which function together as an oil water separation system;
- Railcar and truck offloading equipment for denatured ethanol and off spec product.

## **B. Operating Capacity and Schedule**

The operating capacity of the facility is limited by the volume of gasoline that can be loaded into the tanker trucks from the loading racks under continuous operation. The throughput capacity of the loading racks is physical constrained by the number trucks that can be physically loaded in the loading rack bays rather than the nominal pumping capacity of the loading arms and piping. For purposes of estimating emissions, the PTE of the loading racks is calculated using the maximum number of tanker trucks that can be loaded in each bay (three 8400 gallon tanker trucks in each bay in one hour) with the loading racks operating 24 hours a day, 7 hours a days a week, and 360 days a year (minus holidays). The rate of tanker truck loading in actual practice is lower. There are no limitations on the facility operating schedule.

Maximum throughput through loading racks LR-1 through LR-4 are estimated to be 1,000,000,000 gallons of combined products. (90% as gasoline, and 10% as diesel). The maximum throughput of loading rack LR-5 was estimated as 120,000,000 gallons of gasoline and 321,504,000 gallons of diesel, jet fuel, or other low vapor pressure products. The maximum throughput of LR – 6 was estimated using the throughput limit of 240,000,000 gallons for all products.

The fugitive storage tank emissions estimates were conservatively estimated using 1.12 billion gallons/year of gasoline through each of the gasoline or multiproduct storage tanks and 896,000,000

gallons/year of diesel/jet fuel through each of the diesel/jet fuel product storage tanks. With the minor revision received August 30, 2018, the fugitive storage tank emissions from the former HEP facility (Tanks 36 – T-52) were conservatively estimated using 240,000,000 gallons of gasoline through each of the gasoline or multiproduct storage tanks as a result of the limitations imposed by the previous HEP facility permit (# 5014).

The applicant has accepted the following voluntary throughput limitations on the loading racks to avoid classification as a major source of HAPs and the applicability of 40 CFR Part 63, Subpart R – National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations). The throughput limitation is also contingent upon the facility not using MTBE to oxygenate gasoline at the facility.

- The combined annual throughput of all products through loading racks LR – 1 through 6 will be limited to 1.36 billion gallons in any consecutive 12 month period.
- The annual throughput of gasoline (including oxygenate and additives) through LR – 5 will be limited to 120 million gallons in any consecutive 12 month period.
- The annual throughput of gasoline (including oxygenate and additives) through LR – 6 will be limited to 240 million gallons in any consecutive 12 month period.

### C. Air Pollution Control Equipment

There are two primary Air Pollution Control Devices (APCDs) in use at the source to collect and process gasoline vapors from the loading of tank trucks and the refilling of the terminal drain dry tanks. One John Zink thermal oxidizer and a Vapor Recovery System (VRS) consisting of a carbon adsorption unit and gasoline vapor absorption system. The Jon Zink thermal oxidizer processes vapors captured from loading racks LR-1, LR-2, LR-3, LR-4, and LR-6 and the drain dry tanks T-6, T-7, T-8, T-14, and T-25. The VRS unit collects and processes vapors collected from loading rack LR-5.

### III. Emission Estimates

<b>Potential to Emit with Controls (Tons/yr) (See Attachment 1 for detailed emission estimates)</b>									
<b>Emission Sources</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>NO<sub>x</sub></b>	<b>SO<sub>2</sub></b>	<b>CO</b>	<b>VOC</b>	<b>HAP Total</b>	<b>HAP Single (Hexane)</b>	<b>GHG<sup>3</sup> (Mton/yr)</b>
Storage Tanks (Standing Losses)	-	-	-	-	-	88.29 <sup>1</sup>	4.82	1.47	-
Storage Tanks (Working Losses)						7.81 <sup>1</sup>	0.23	.07	-
Truck Fugitives	-	-	-	-	-	91.61	4.81	1.47	-
John Zink Thermal Oxidizer (Includes vapors displaced from LR1-4, 6, and Drain Dry tank turnovers)	1.39	1.39	22.57	0.61	56.41	81.19	4.26	1.29	-
John Zink Vapor Recovery System (Includes vapors displaced from LR-5)	-	-	-	-	-	17.40	0.92	0.29	-
Ethanol Offloading Pump Sleeves	-	-	-	-	-	4.84	0.01	-	-
Piping Component Fugitives	-	-	-	-	-	6.55	0.34	0.10	-
Oil/Water Separators/Sumps/Water Tank	-	-	-	-	-	7.05	0.03	0.01	-
Pipeline Meter Prover and Sump	-	-	-	-	-	0.20	-	-	-
Onsite portable thermal oxidizer rated at 50 MMBTU/hr; Fuel: LPG, Propane. or Butane	0.02	0.02	1.0	0.25	0.36	0.02	-	-	-
<b>Facility Wide Total</b>	<b>1.41</b>	<b>1.41</b>	<b>23.56</b>	<b>0.86</b>	<b>56.77</b>	<b>304.94</b>	<b>15.42</b>	<b>4.7</b>	<b>1.99E+04</b>

<sup>1</sup> The majority of the storage tank fugitive emissions are from annual standing losses from gasoline storage tanks (88.29 tpy), using the maximum annual anticipated throughput volume in gallons through each respective storage tank.

<sup>3</sup> GHG emissions based on total annual throughput through the thermal oxidizer using EPA published data.

## **IV. Applicable Requirements**

### **Code of Federal Regulations:**

#### **40 CFR, Part 60 Standards of Performance for New Stationary Sources**

Subpart A	General Provisions
Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978
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
Subpart XX	Standards of Performance for Bulk Gasoline Terminals
Appendix A	Test Methods
Appendix B	Performance Specifications

#### **40, CFR, Part 63 National Emission Standards for Hazardous Air Pollutants for Source Categories**

Subpart A	General Provisions
Subpart BBBBBB	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminal, Bulk Plants, and Pipeline Facilities

#### **40, CFR, Part 64 Compliance Assurance Monitoring**

#### **Pima County Code, Title 17, Chapter 17.11 – General Provisions**

##### **Article I – Scope and Authority**

17.11.010	Statutory Authority.
17.11.020	Planning, Constructing, or Operating Without a Permit.

##### **Article II – General Provisions for Stationary Sources**

17.11.060	Permit display or posting.
17.11.080	Permit shield.
17.11.120	Material permit condition.
17.11.160	Test methods and procedures.
17.11.190	Permits Containing synthetic emission limitations and standards.
17.11.210	Performance tests.

## **Pima County Code, Title 17, Chapter 17.12 – Individual Permits and Permit Revisions for Class I Permits**

### **Article I – Application Processing and Procedures**

- 17.12.010 Permit application processing procedures for Class I Permits.
- 17.12.040 Permit Contents for Class I permits.

### **Article II – Permit Revisions, Renewal, and Transfers for Class I Permits.**

- 17.12.080 Compliance plan.
- 17.12.090 Facility changes allowed without permit revisions.
- 17.12.100 Administrative permit amendments.
- 17.12.110 Minor permit Amendments.
- 17.12.120 Significant permit revision.
- 17.12.130 Permit reopenings – revocation and reissuance – termination.
- 17.12.140 Permit renewal and expiration.

### **Article III – Emissions for Class I Permits**

- 17.12.160 Annual emissions inventory questionnaire.
- 17.12.170 Excess emissions reporting requirements.
- 17.12.180 Affirmative defenses for excess emissions due to malfunctions, startup, and shutdown.

### **Article V – Fees for Class I Permits**

- 17.12.220 Fees related to Class I permits.

## **Pima County Code, Title 17, Chapter 17.14 – Activity Permits**

- 17.14.040 Fugitive dust activity permits.

### **Pima County State Implementation Plan (SIP):**

- SIP Regulations: 10, 11, 20, 21, 22, 23, 24, 26, 30, 31, 32, 33, 34, 50, 51, 60, 61, 62, 63, 70, 72
- SIP Rules: 101-113, 201-215, 222, 224, 233, 241, 261, 301, 302, 314, 315, 316, 318, 321, 331, 332, 341-44, 403, 501-506, 511, 601, 611, 612, 621-624, 631, 711-714, 721, 722

## **Pima County Code, Title 17, Chapter 17.16 – Emission Limiting Standards**

### **Article I – General Provisions**

- 17.16.010 Local rules and standards – Applicability of more than one standard.
- 17.16.020 Noncompliance with applicable standards.
- 17.16.030 Odor limiting standards.

### **Article II – Visible Emission Standards**

- 17.16.040 Standards and applicability (includes NESHAP).
- 17.16.050 Visibility limiting standard.

### **Article III – Emissions from Existing and New Nonpoint Sources**

- 17.16.060 Fugitive dust producing activities.
- 17.16.070 Fugitive dust emissions standards for motor vehicle operation.
- 17.16.080 Vacant lots and open spaces.
- 17.16.090 Roads and streets.

- 17.16.100 Particulate materials.
- 17.16.110 Storage piles.

**Article IV – New and Existing Stationary Source Performance Standards**

- 17.16.130 Applicability.
- 17.16.230 Standards of performance for storage vessels for petroleum liquids.
- 17.16.400 Organic solvents and other organic materials.
- 17.16.430 Standards of performance for unclassified sources.

**Pima County Code Title 17, Chapter 17.20 – Emissions Source Testing and Monitoring**

- 17.20.010 Source sampling, monitoring and testing.
- 17.20.040 Concealment of emissions.

**Pima County Code Title 17, Chapter 17.24 – Emissions Source Recordkeeping and Reporting**

- 17.24.020 Recordkeeping for compliance determination.
- 17.24.030 Recordkeeping for emission inventories
- 17.24.040 Reporting for compliance evaluations
- 17.24.050 Reporting as a permit requirement
- 17.24.060 Reporting for emission inventories

**Article IV – Penalty for noncompliance**

**Pima County Code Title 17, Chapter 17.28 – Violations and Conditional Orders**

- Article I – Violations** (inclusive)
- Article II – Conditional Orders** (inclusive)
- Article III – Circumvention** (inclusive)

**V. Permit Changes and Applicability Determinations.**

- 1. Permit and Permit Summary:

Changes as a result of current Renewal

The information in the Summary has been amended to correct any errors and update the permit to the current configuration of the facility. The facility has decommissioned and removed the NAO thermal oxidizer which had been used by the former HEP facility to control emissions from LR-6. Gasoline vapor emissions from LR-6 are now exclusively controlled by the John Zink thermal oxidizer. References and conditions relating to use of the NAO thermal oxidizer, as an alternate control device have been removed from the permit. The semiannual monitoring reports compliance certification reports along with the due dates have were aligned to the regular Jan-June and July-December periods to maintain consistency with Class I sources operating in Pima County.

Changes as a result of Previous Acquisitions and Revisions:

**Acquisition of former HEP assets (June 2018)**

The previous permit and summary was revised to include the acquisition of the terminal and assets formerly owned and operated by Holly Energy Partners ( Permit # 5014). The former HEP facility incorporated voluntary throughput limitations of 240 million gallons of gasoline including additives and oxygenates. The permit was revised to include the 7 storage tanks, and a loading rack with control device.

The throughput limitation has been incorporated in condition 41.a.i and iii of the permit and is the underlying basis for the potential emission estimates for that portion of the facility wide PTE.

The combined facility did not trigger any requirements for new major sources or major modifications to existing sources under the rules in 40 CFR §52.21 - Prevention of significant deterioration of air quality (PSD) requirements since the facility was not physically changed nor has there been a change in the manner of operation resulting in a significant net emissions increase of any air pollutant.

The former HEP facility was previously operated as a non-categorical minor source of VOC, and not required to estimate fugitive emissions in their PTE. The estimates of fugitive emissions from the former HEP terminal and assets were included in the estimates for the facility.

#### **Acquisition of former Chevron Assets (October 2010)**

The previous permit and summary was revised to include the acquisition of the terminal and assets formerly owned and operated by Chevron (permit #1767). The former Chevron terminal permit incorporated a voluntary throughput limitation of 120 million gallons of gasoline including additives and oxygenates through its loading rack. The renewal permit includes the combined facilities, and the prior limitation in permit # 1767 remains unchanged. The throughput limitation has been included under Condition 41.a.i. and ii of the permit and is the underlying basis for the emission estimates for that portion of the Facility Wide PTE.

The combined facility did not trigger any requirements for new major sources or major modifications to existing sources under the rules in 40 CFR §52.21 - Prevention of significant deterioration of air quality (PSD) requirements, since the facility was not physically changed and/or changed in the manner of operation that resulted in a significant net emissions increase of any air pollutant.

The former chevron facility was previously operated as a non-categorical minor source of VOC, and not required to estimate fugitive emissions in their PTE. The estimates of fugitive emissions from the former Chevron terminal and assets were included in the estimates for the facility.

## 2. Authority, Classification, Permit Organization, and Applicability:

### Changes as a result of current Renewal (2020)

A definition section was added during the renewal of this permit and the permit sections were renumbered during for this renewal.

### Changes as a result of changes in Previous Renewal & Revisions (2015-2020)

A section was added to the permit to provide statutory authority, permit classification, descriptions of the permit sections, and to provide a layout for the permit organization. With the August 30, 2018 revision the permit was also reformatted to a numeric permit condition format for ease of use in locating cross references in the permit. The references to the Pima County Code (PCC) were changed to reflect the newly renumbered applicable PCC sections.

The Permittee acquired a source subject to NSPS, subpart K, the complimentary applicability, emission limitations, recordkeeping, reporting, and testing requirements for 40 CFR 60.110 were added to the permit. Discussions with the source discovered that the previous lone tank subject to NSPS Subpart Ka was modified and should be subject to NSPS, Subpart Kb. With no tanks subject to Ka, the complimentary requirements for NSPS, subpart Ka were removed from the permit.

This section of the permit was modified to provide a reference for the applicability of the CFR rules to the affected facilities and to organize the permit sections. Condition 28.d.iv a voluntary limitation that has been added to clarify that the GD GACT will apply to the facility storage tanks and equipment that handle transmix, or are listed by the permit in multiproduct service that includes gasoline.

3. Sources subject to GD GACT:

Changes as a result of current Renewal (2020)

References and Conditions to the former NAO oxidizer have been removed from the permit.

Changes as a result of changes in Previous Renewal & Revisions (2015-2020)

Condition 42.a.i.(a)(iii) was added to incorporate the continuous monitoring parameter and method chosen for the applicable control devices.

Conditions 28, 35, 42, 49, 56, and 63 were added to the permit to incorporate the respective emission limitations and management practice, monitoring, recordkeeping, reporting, and testing requirements in 40 CFR 63, Subpart BBBB – NESHAP for source category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

4. Air Pollution Controls:

Changes as a result of current Renewal (2020)

The NAP thermal oxidizer was removed as a control device along with any corresponding permit conditions.

Changes as a result of changes in Previous Renewal & Revisions (2015-2020)

Permit condition 33.b was revised to include applicable parts of 40 CFR Part 64 applicable toward the submittal of CAM plans upon renewal of the permit. The NAO thermal oxidizer installed to control emissions from LR – 6 was added to the list of APC subject to 40 CFR Part 64 and as necessary in complementary conditions as an applicable unit.

Conditions 33, 40, 47, 54, 61 and 68 were added to the permit to incorporate applicable requirements from 40 CFR 64 – Compliance Assurance Monitoring (CAM) and the respective CAM plans in Attachment 2 of the renewal permit for the John Zink thermal oxidizer (TO) and vapor recovery system (VRS) control devices operating at the facility.

5. Facility Wide Operations:

Changes as a result of current Renewal (2020)

N/A

Changes as a result of changes in Previous Renewal & Revisions (2015-2020)

Conditions 34, 41, 48, 55, 62, and 69 were added to the permit to incorporate the applicable County and facility terminal specific provisions that fall outside the source category rules in the CFR.

This section includes the following:

- Voluntary limitations taken by the facility to remain a minor source of HAPs are provided in condition 41.a. A notification requirement in condition 41.a.iv was added to clarify that the PTE and minor source HAPs status of the facility is dependent on the gasoline throughput of the facility and not using reformulated or oxygenated gasoline containing MTBE. Use of MTBE reformulated or

oxygenated gasoline would subject the source to the rules in 40 CFR 63, Subpart R and 40 CFR 61, Subpart V – Equipment Leaks (Fugitive Emission Sources).

- The voluntary limitations from the former HEP facility (permit #5014) were added to this section limiting the throughput through all loading racks to 1.36 billion gallons and to 240 million gallons through loading rack LR – 6.
- A previous permit condition to record the number of turnovers (roof landings) of the terminal drain dry tanks was moved to condition 41.a.v. and modified to add a voluntary limit to the number of turnovers (roof landings). A complimentary monitoring condition was also added in condition 41.a.ii.
- A voluntary condition 41.a.vi. and complimentary conditions were added to the renewal permit to limit, monitor, and record the annual operating hours of an onsite portable thermal oxidizer used for degassing storage tanks emptied for repairs.
- County and SIP rules were added for fugitive dust that apply to facility nonpoint sources as well as general provisions to include VOC handling and odor.

Note: In Attachment 2 of this TSD, the Permittee identified vacant lots and/or open spaces that are contiguous to the facility and requested that PDEQ clarify if the areas are considered undisturbed land as provided in condition 48.f.ii.(b) which provides a locally enforceable exemption for undisturbed land from the visibility limiting standard.

For the purpose of this permit, it is PDEQ's position that undisturbed land means: "land that has not been the subject of human activity that has changed the land surface such that it is clear or observable". Currently, some of the areas identified in Attachment 2 contain observable areas that have been disturbed by human activity or development, while other areas appear to be relatively undisturbed. In the event of a complaint or identified deficiency with the visibility limiting standard, the undisturbed land exemption in condition 48.f.ii.(b) will be determined by inspection on a case-by-case basis.

## 6. CAM Plans:

### Changes as a result of current Renewal (2020)

N/A

### Minor Revision Received August 30, 2018 to incorporate former HEP assets:

The CAM plan for the NAO thermal oxidizer is due for submittal upon renewal of the permit.

### Previous Renewal

The Cam plans for the PSEU's were modified and added as attachments in a standard outline form. The Cam Plan for the VRS at the previous Chevron facility was also added. The two PSEU's are the primary control devices for the facility loading racks. The CAM Plan operating limits equal or exceed the applicable operating parameter limits in the NSPS and NESHAP source category rules in the CFR. Conditions were modified to clarify the indicators, minimum data collection, and maintenance requirement thresholds that constitute excursions or exceedances.

### Minor Revision to VRS Cam Plan Dated 10/8/2015:

The Cam plan for the VRS at loading rack 5 was revised to correct and update the applicable QA/QC standards and practices applicable to the CEMS system. An alternate monitoring approach was added to the CAM plan for use during periods when the CEMS is out of control, inoperable, or otherwise off-line.

#### **VI. Periodic Monitoring.**

The semiannual summary report of required monitoring condition in condition 62.b has been modified from the previous permit condition to include the semiannual report requirements in 40 CFR Part 63, Subpart BBBBBB, and the monitoring of the facility wide voluntary limitations. For all other monitoring required by the source category rules in the CFR, the permit requires the facility to maintain the required monitoring records on site as provided in condition 55.e of the Permit.

#### **VII. Insignificant Activities.**

The insignificant activities listed in Attachment 4 of the renewal permit have been determined by the Control Officer as not necessary to be included (based on size or production rate) in an application in order to determine all applicable requirements and to calculate fees under Title 17 of the Pima County Code.

PROPOSED

**ATTACHMENT 1**

Pages from Application dated December 11, 2019 to include:  
Appendix C – Pages 1 through 17 – Facility Wide Emissions,  
Appendix D – Tanks 4.0.9d Output Tanks Database Reports

**ATTACHMENT 2**

Identified Vacant Lots or Open Spaces Contiguous to the Facility

PROPOSED