TITLE V OPERATING PERMIT
STATEMENT OF BASIS

Facility Name:	SFPP, L.P. Mission Valley Terminal
Title V Permit No.:	APCD2011-TVP-00031
Permit Application Nos.:	APCD2015-APP-004291 (renewal)
Site ID:	APCD1979-SITE-00623
Equipment Address:	9950 San Diego Mission Road San Diego, CA 92108
Facility Contact: **Contact Information:**	Yijin Wang 714-560-4886 ; yijin_wang@kindermorgan.com
Permit Engineer:	Doug Erwin

1.0 Purpose/Introduction

This statement of basis describes the renewal Title V permit for SFPP, L.P.

2.0 Facility Description

SFPP is a petroleum products storage and transfer terminal. The facility consists of liquid storage tanks, transfer equipment, and vapor capture and control equipment.

The primary air quality focus for this facility is the emissions of volatile organic compounds (VOC) from vents due to both normal breathing losses and working losses, the latter of which occur when transfers are being performed.

3.0 Title V Applicability

In 2010 SFPP purchased the adjacent Shell terminal. With this merger, combined emissions of VOC exceeded the Title V major source threshold of 100 tons/year. SFPP submitted its initial Title V permit application shortly after this merger and the initial permit was issued in 2012.

4.0 Applicable Requirements

The following tables list the rules that apply at SFPP. The requirements from each listed rule are incorporated into the District and Title V permits accordingly. In some cases, a requirement may be "subsumed" by another, more stringent requirement.

Facility-wide Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. II	10	Permits Required
SDCAPCD Reg. II	19	Provision of Sampling & Testing Facilities
SDCAPCD Reg. II	19.3	Emission Information
SDCAPCD Reg. II	21	Permit Conditions
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. V	98	Breakdown Conditions: Emergency Variance
SDCAPCD Reg. VI	101	Burning Control
SDCAPCD Reg. VI	131	Stationary Source Curtailment Plan
SDCAPCD Reg. VI	132	Traffic Abatement Plan

Emission Unit Specific Requirements

Regulation	Rule Citation	Title
SDCAPCD Reg. IV	50	Visible Emissions
SDCAPCD Reg. IV	51	Nuisance
SDCAPCD Reg. IV	52	Particulate Matter
SDCAPCD Reg. IV	60	Circumvention
SDCAPCD Reg. IV	61.5	Visible Emissions Standards for Vapor Control Systems
SDCAPCD Reg. IV	61.6	NSPS Requirements for Storage of VOC
SDCAPCD Reg. IV	61.7	Spillage and Leakage of VOC
SDCAPCD Reg. IV	62	Sulfur Content of Fuels
SDCAPCD Reg. IV	67.0	Architectural Coatings
SDCAPCD Reg. IV	67.17	Storage of Materials Containing VOC
SDCAPCD Reg. IV	67.3	Metal Parts and Products Coating
SDCAPCD Reg. IV	71	Abrasive Blasting
SDCAPCD Reg. VI	102	Open Fires – Western Section
SDCAPCD Reg. VI	105	Burning Permits
SDCAPCD Reg. VI	106	Permit Duration
SDCAPCD Reg. VI	107	Burning Hours
SDCAPCD Reg. VI	108	Burning Conditions
SDCAPCD Reg. VI	111	Prior Notification
SDCAPCD Reg. VI	112	Burning Report
SDCAPCD Reg. X	Subpart A	NSPS - General Provisions
SDCAPCD Reg. XI	Subpart A	NESHAP - General Provisions
40 CFR Part 60	Subpart A	NSPS – General Provisions
40 CFR Part 61	Subpart A	NESHAP - General Provisions

40 CFR Part 63	Subpart A	NESHAP (MACT Standards) – General Provisions
40 CFR Part 63	Subpart BBBBBB	NESHAP: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities
SDCAPCD Reg. XI	Subpart M, 361.145	Standard for Demolition and Renovation
SDCAPCD Reg. XI	Subpart M, 361.150	Standard for Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation, and Spraying Operations
40 CFR Part 82	Subpart A	Production and Consumption Controls
40 CFR Part 82	Subpart B	Servicing of Motor Vehicle Air Conditioners
40 CFR Part 82	Subpart F	Recycling and Emissions Reduction

5.0 Monitoring, Record-keeping and Reporting (MRR)

MRR Plant-wide Pursuant Title V

Section I. C. of the permit contains general MRR that extend to the entire facility and are based on District Regulation XIV and 40 CFR part 70. These requirements include records retention, semiannual compliance reporting, annual compliance certification, and deviation reporting.

MRR on Specific Emission Units

SFPP owns a single emergency engine and a vapor capture and combustion system. Each of these emission units contains conditions requiring monitoring and/or testing to demonstrate compliance with applicable requirements; and record-keeping where appropriate and/or effective to ensure enforceability. The balance of emission units are liquid storage vessels that emit VOC vapors, which incorporate permit conditions citing, among other similar pursuits, leak detection and repair and tank seal monitoring and maintenance.

5.0 Compliance Assurance Monitoring (CAM)

SFPP was evaluated for CAM applicability in 2011 in accordance with 40 CFR Part 64. A single emission unit was identified at that time as having the potential to emit pre-control VOCs in excess of 100 tons/year, and therefore was deemed subject to CAM. A CAM plan was submitted and conditions were incorporated into the District permit consistent with CAM requirements. Most notably, the incinerator exhaust temperature must be maintained within a specified range to ensure effective destruction of VOCs.

For the 5-year period leading up to this renewal, the following table summarizes all changes and the associated consideration and determination for CAM. None of these actions triggered CAM, and the originally established CAM conditions remain in the incinerator permit (PTO #860515).

Permit or App#	EU Type	Does CAM Apply?	Reason(s) for CAM Determination
App2345	Administrative Amendment	No	No operational change
App3406	Tank MV-5	No	Operational flexibility – no change to emissions; no new requirements
App3524	Tank MV-28	No	Operational flexibility – no change to emissions; no new requirements
App3547	Vapor Combustion Unit	Yes (CAM already included)	No change necessary; minor modification to existing EU with CAM requirements included– no effect on vapor handling or emissions
App4151	Tank MV-7	No	Operational flexibility – no change to emissions; no new requirements
App4669	Tank MV-9	No	Operational flexibility – no change to emissions; no new requirements
App4814	Tank MV-32	No	Operational flexibility – no change to emissions; no new requirements

7.0 Permit Shield

In accordance with District Rule 1410(p) and 40 CFR Part 70.6(f), a permit can include a provision precluding the permittee from enforcement action for certain requirements that either do not apply or that are superseded by another requirement to which the permittee is subject, as stated in the permit. A permit shield, if granted, is limited as given by the aforementioned regulations.

A permit shield was requested by the applicant and is provided at Section II. D. of the permit. Permit shields were granted for three regulations, as listed, because none of these regulations apply to operations at SFPP.

8.0 Conclusions / Recommendations

The source is expected to comply with all applicable requirements including those cited in the current District permits as well as those under District Rule 1401 and 40 CFR Part 70. Therefore, the recommendation of this report is for the subject renewal Title V permit to be issued following public notice and EPA review.