

# Public Notice

## DEQ Requests Comments on Phillips 66 Company's Proposed Air Quality Permit

DEQ invites the public to submit written comments on the conditions of Phillips 66 Company's proposed air quality permit, known officially as a Standard Air Contaminant Discharge Permit.

### Summary

DEQ proposes to renew an air permit for Phillips 66 Company and is inviting public comment on the proposed permitting action. During the notice period the public is invited to make comments related to specific conditions within the proposed permit renewal.

The permittee is not proposing changes to the emission limits in the permit renewal.

### How do I participate?

To submit your comments for the public record, send them by mail, fax or email:

NWR Air Quality Permit Coordinator  
700 NE Multnomah St., Suite 600  
Portland, OR 97232

**Fax:** 503-229-6945

**Email:** [nwraqpermits@deq.state.or.us](mailto:nwraqpermits@deq.state.or.us)

Written comments are due by 5 p.m. Thursday Sept. 14, 2017.

### About the facility

Phillips 66 Company's Portland Terminal is located at 5528 NW Doane Ave in Portland, OR. The prior permit was issued on Oct. 9, 2008, a non-technical modification was issued on May 29, 2012, a moderate technical modification was issued on March 12, 2013, and the permit was scheduled to expire on April 1, 2013. A timely permit renewal application was submitted, so the existing permit remains in force until final action is taken on the renewal application.

This facility stores gasoline, diesel and related fuel products transferring these products from the storage tanks to the tanker trucks for delivery to gasoline stations throughout the area.

The permit also allows for the transfer of fuel products to marine barges.

The storage, filling, emptying and transfer of fuel products release Volatile Organic Compounds to the air. Other criteria pollutant emissions are byproducts of combustion.

### What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the table at the end of this document.

### How does DEQ determine permit requirements?

DEQ evaluates types and amounts of pollutants and the facility's location, and determines permit requirements according to state and federal regulations.

### How does DEQ monitor compliance with the permit requirements?

This permit would require the facility to monitor pollutants using federally-approved monitoring practices and standards.

Emissions are calculated based on quantities stored and transferred. Criteria pollutant emissions from combustion processes are calculated based on the amount of fuel burned.

Phillips 66 Company is required to submit semiannual and annual reports to DEQ. DEQ reviews these reports to ensure compliance with permit conditions.

### What happens after the public comment period ends?

DEQ will consider and provide responses to all comments received at the close of the comment period. DEQ may modify provisions in the proposed permit, but the permit writers can only modify conditions of the permit in accordance with the rules and statutes under the authority of DEQ. Participation in the rulemaking or the legislative process is the only way to change the rules or statutes.

Ultimately, if a facility meets all legal requirements, DEQ will issue the facility's air quality permit.



State of Oregon  
Department of  
Environmental  
Quality

Northwest Region  
700 NE Multnomah St.,  
Suite 600  
Portland, OR 97232

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Contact: Permit Writer  
David Kauth

[www.oregon.gov/DEQ](http://www.oregon.gov/DEQ)

*Search for Phillips 66, air quality permit renewal*

*DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.*

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If you received a hard copy of this notice, please consider receiving updates via e-mail instead. Send your request to: [subscriptions@deq.state.or.us](mailto:subscriptions@deq.state.or.us)

Please include your full name and mailing address so that we can remove you from our print mailing list.

### Where can I get more information?

Find out more and view the application at <http://www.oregon.gov/deq/GetInvolved/Pages/Public-Notices.aspx> or contact:

NWR Air Quality Permit Coordinator:  
**Phone:** 503-229-5582 or 1-800-452-4011  
**Fax:** 503-229-6945  
**Email:** [nwraqpermits@deq.state.or.us](mailto:nwraqpermits@deq.state.or.us)

View the application and related documents in person at the NWR DEQ office in Portland. For a DEQ review appointment, call 503-229-5582.

### Accessibility information

Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call DEQ in Portland at 503-229-5696, or toll-free in Oregon at 1-800-452-4011, ext. 5696; or email [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us).

People with hearing impairments may call 711.

### Emissions limits

Emission limits in the proposed permit renewal are the same as those in the existing permit. Fine particulate matter has been added as a regulated pollutant.

**Criteria Pollutants:** Table 1 below presents maximum allowable emissions of criteria pollutants for the facility. The current emission limit reflects maximum emissions the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

**Table 1**

Criteria Pollutant	Current Limit (tons/yr)	Proposed Limit (tons/yr)
Small particulate matter	14	14
Fine particulate matter*	NA	9
Nitrogen oxides	39	39
Sulfur dioxide	75	75
Carbon monoxide	99	99
Volatile organic compounds	99	99

\*Fine particulate matter (PM2.5) has been added to the proposed permit as a regulated pollutant; this is not an actual increase in emissions, only a recognition that the pollutant exists.

For more information about criteria pollutants, go to: [www.epa.gov/criteria-air-pollutants](http://www.epa.gov/criteria-air-pollutants)

### Hazardous Air Pollutants:

Phillips 66 Company is not a major source of hazardous air pollutants; however EPA has determined that businesses similar to this facility, as a group, emit enough hazardous air pollutants to warrant regulation. Therefore, this source is subject to the following National Emission Standard for Hazardous Air Pollutants: 40 CFR Part 63 Subpart BBBBBB for Gasoline Distribution Bulk Terminals. Total HAP emissions from the facility are estimated to be less than 3 tons per year. More detailed information can be found in the review report.

For more information about hazardous air pollutants, go to: <https://www.epa.gov/haps/health-effects-notebook-hazardous-air-pollutants>





# STANDARD AIR CONTAMINANT DISCHARGE PERMIT

Department of Environmental Quality  
Northwest Region  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232  
503-229-5263

This permit is being issued in accordance with the provisions of ORS 468A.040 and based on the land use compatibility findings included in the permit record.

**ISSUED TO:**

Phillips 66 Company  
5528 NW Doan Ave  
Portland, OR 97210

**INFORMATION RELIED UPON:**

Application No.: 027124  
Date Received: 12/24/12

**PLANT SITE LOCATION:**

Portland Terminal  
5528 NW Doane Ave  
Portland, OR 97210

**LAND USE COMPATIBILITY FINDING:**

Approving Authority: City of Portland  
Approval Date: 01/25/93

**ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY**

\_\_\_\_\_  
Michael Orman, E.I.T., Northwest Region Air Quality Manager

\_\_\_\_\_  
Dated

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-8010):

Table 1 Code	Source Description	SIC
Part B, 34	Gasoline Terminal	5171

## TABLE OF CONTENTS

1.0	GENERAL EMISSION STANDARDS AND LIMITS .....	3
2.0	SPECIFIC PERFORMANCE AND EMISSION STANDARDS .....	4
3.0	SPECIAL CONDITIONS .....	9
4.0	PLANT SITE EMISSION LIMITS .....	10
5.0	COMPLIANCE DEMONSTRATION .....	10
6.0	NESHAP COMPLIANCE DEMONSTRATION.....	13
7.0	RECORDKEEPING REQUIREMENTS .....	15
8.0	REPORTING REQUIREMENTS .....	17
9.0	ADMINISTRATIVE REQUIREMENTS .....	19
10.0	FEES .....	20
11.0	GENERAL CONDITIONS AND DISCLAIMERS .....	20
12.0	EMISSION FACTORS.....	22
13.0	ABBREVIATIONS, ACRONYMS, AND DEFINITIONS .....	24

## 1.0 GENERAL EMISSION STANDARDS AND LIMITS

- 1.1. Visible Emissions** The permittee must not allow emissions from fuel burning equipment to equal or exceed 20% opacity.
- 1.2. Particulate Matter Emissions** The permittee must comply with the following particulate matter emission limits, as applicable:
- a. Particulate matter emissions from any burning equipment must not exceed 0.14 grains per standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air.
  - b. Particulate matter emissions from fuel burning equipment must not exceed the emission rate shown in Figure 1 of OAR 340-208-0610 as a function of the maximum heat input when using all other fuels except natural gas and LPG.
- 1.3. Nuisance and Odors** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by DEQ personnel.
- 1.4. Fuels and Fuel Sulfur Content** The permittee must comply with the following fuel and fuel sulfur content requirements:
- a. The permittee must not use any fuel other than natural gas, propane, butane, ASTM grade fuel oils, or on-specification used oil.
  - b. The permittee must not sell, distribute, use (combust), or make available for use within the state of Oregon, any fuel oil which exceeds the following sulfur content limitations unless exempted below:
    - i. 0.3% sulfur by weight for ASTM Grade 1 distillate oil;
    - ii. 0.5% sulfur by weight for ASTM Grade 2 distillate oil;
    - iii. 1.75% sulfur by weight for residual oil;
    - iv. The permittee must note on the bill of lading or custody transfer document the following statement “Fuel oil or residual oil with sulfur content above 1.75% by weight may not be used within the State of Oregon.”
  - c. Exemptions from the requirements of Condition 1.4.b above:

- i. Fuels used exclusively for the propulsion and auxiliary power requirements of vessels, railroad locomotives, and diesel motor vehicles.
  - ii. With prior approval of DEQ, fuels used in such a manner or control provided such that sulfur dioxide emissions can be demonstrated to be equal to or less than those resulting from the combustion of fuels complying with the limitations of Condition 1.4.b above.
- d. The permittee is allowed to use on-specification used oil as fuel provided it contains no more than 0.5% sulfur by weight. The permittee must obtain analyses from the marketer or, if generated on site, have the used oil analyzed, so that it can be demonstrated that each shipment of oil does not exceed the used oil specifications contained in 40 CFR Part 279.11, Table 1.

## 2.0 SPECIFIC PERFORMANCE AND EMISSION STANDARDS

- 2.1. Refined Products Truck Loading Rack** Pursuant to OAR 340-232-0085 through 0100, the permittee must observe the following conditions of operation for the truck loading rack:
- a. The permittee must not allow volatile organic compounds (VOC) to be emitted into the atmosphere in excess of 80 milligrams of VOC per liter of gasoline loaded (0.67 lb VOC/1000 gal gasoline loaded) from the loading of truck tanks and truck trailers at the bulk gasoline terminal.
  - b. Gasoline may only be transferred between the loading rack and a truck tank or a truck trailer when a current Oregon leak test certification form for the delivery vessel (tank truck or trailer) is on file with the terminal or a valid Oregon delivery vessel certification sticker is verified to be displayed on the delivery vessel.
  - c. All displaced vapors and gases from the delivery vessel must be vented only to the vapor recovery/control system.
  - d. All equipment associated with the vapor recovery/control system must be maintained to be vapor-tight and in good working order by following manufacturer recommended maintenance.

- e. Each loading device must be designed and operated to allow no more than 10 cubic centimeters drainage per disconnect on the basis of five consecutive disconnects.
- f. There must be no visible liquid gasoline leaks during loading or unloading operations. All observed leaks must be corrected immediately, or that system must be removed from service until the leaks are corrected.
- g. All gasoline loading lines must be equipped with fittings which make vapor-tight connections and which close automatically and immediately when disconnected.
- h. All vapor lines must be equipped with fittings which make vapor-tight connections and which close automatically and immediately when disconnected or which contain vapor-tight unidirectional valves.
- i. The vapor collection system must be maintained and operated in a manner to prevent the pressure therein from exceeding a pressure of 18 inches of water gauge and a vacuum of 6 inches of water gauge in the tank truck or trailer being loaded.
- j. During periods when the loading rack is not operated by the permittee, the permittee's responsibility shall be defined in a letter of agreement on file at the terminal, signed by the person (or their agent) who will operate the truck loading rack, confirming compliance with the above conditions.
- k. "Vapor tight" as used in this condition means: using an explosimeter, no reading may equal or exceed 100 percent of the lower explosive limit (LEL, measured as propane), measured at 2.5 centimeters from all points on the perimeter of a potential leak source when measured by Method 31 and 33 on file with DEQ.

## 2.2. Marine Vessel Loading

Pursuant to OAR 340-232-0110, the permittee must observe the following conditions of operation for marine vessel loadings:

- a. The permittee may load gasoline onto marine tank vessels, or load any liquid onto a marine tank vessel that had previously held gasoline pursuant to OAR 340-232-0110.
  - i. Each loading berth must be equipped with a vapor collection system that is designed to collect all displaced VOC vapors during the loading of

- marine tank vessels. The collection system must be designed such that all displaced VOC vapors collected during any loading event are vented only to the control device.
- ii. Vapors that are displaced and collected during marine tank vessel loading events must be reduced from the uncontrolled condition by at least 95 percent by weight as determined by EPA Method 25 or other methods approved in writing by the Department or limited to 5.7 grams per cubic meter (2 lbs per 1000 bbls) of liquid loaded.
- b. Operating Practice and Maintenance.
- i. All hatches, pressure relief valves, connections, gauging ports and vents associated with the loading of fuel product into marine tank vessels must be maintained to be leak free and vapor tight.
  - ii. The permittee must certify to DEQ that the vessel is leak free, vapor tight, and in good working order based on an annual inspection using EPA Method 21 or other methods approved in writing by DEQ.
  - iii. Gaseous leaks must be detected using EPA Method 21 or other methods approved in writing by DEQ.
  - iv. Loading must cease anytime gas or liquid leaks are detected. Loading may continue only after leaks are repaired or if documentation is provided to DEQ that the repair of leaking components is technically infeasible without dry-docking the vessel or cannot otherwise be undertaken safely. Subsequent loading events involving the leaking components are prohibited until the leak is repaired. Any liquid or gaseous leak detected by DEQ staff is a violation of OAR 340-232-0110.
- c. Monitoring and Recordkeeping.
- i. The permittee must maintain operating records for at least five years of each loading event at the terminal. Records must be made available to DEQ upon request.  
  
Records maintained must include, but are not limited to: location of each loading event; date of arrival and departure of the vessel; name, registry and legal owner of each marine tank vessel



participating in the loading event; type and amount of fuel product loaded into the marine tank vessel; prior cargo carried by the marine tank vessel (if the marine tank vessel has been gas freed, then the prior cargo can be recorded as gas freed); description of any gaseous or liquid leak, date and time of leak detection, leak repair action taken and screening level after completion of the leak repair.

### 2.3. Storage Tanks

Fixed roof storage tanks having capacities greater than 150,000 liters (approx. 39,000 gallons), storing volatile organic compound liquids with true vapor pressures (determined in accordance with methods described in American Petroleum Institute Bulletin 2517, Evaporation Loss from External Floating-Roof Tanks), as stored, of greater than 1.52 psia at actual monthly average storage temperatures, must meet the following conditions:

- a. The fixed roof storage tanks must be equipped with an internal floating cover equipped with a continuous closure device (primary seal) between the tank wall and the cover edge. The primary seal must be a minimum of a nonmetallic resilient seal.
- b. The cover is to be floating at all times, (i.e., off the leg supports) except during initial fill and when the tank is completely emptied and subsequently refilled. The process of emptying and refilling when the cover is resting on the leg supports must be continuous and is to be accomplished as rapidly as possible.
- c. Each opening in the cover except for automatic bleeder vents and the rim space vents is to provide a projection below the liquid surface.
- d. Each opening in the cover except for automatic bleeder vents, rim space vents, stub drains and leg sleeves is to be equipped with a cover, seal, or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use.
- e. All tank gauging and sampling devices must be gas-tight except when gauging or sampling is taking place; except for slotted gage wells which must have floating seals with one half inch edge gaps or less.

- f. All seals are to be maintained in good operating condition and the seal fabric may contain no visible holes, tears or other openings. Records of scheduled and unscheduled maintenance and inspections must be maintained to verify seal condition.
- g. Automatic bleeder vents are to be closed at all times except when the cover is being floated off or landed on the leg supports.
- h. Rim vents are to be set to open only when the cover is being floated off the leg supports or at the manufacturer's recommended setting.
- i. The permittee must not store any volatile organic compound liquid with a true vapor pressure, as stored, of greater than 570 mm Hg (11.1 psia), unless the respective storage tank is equipped with a vapor recovery system or its equivalent.

**2.4. 40 CFR 60  
Subpart Kb  
(NSPS)**

The permittee must comply with the following applicable requirements from the federal New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984:

- a. For all Subpart Kb subject tanks owned/operated by the permittee, with storage capacities greater than 75 m<sup>3</sup> (19,813 gallons), the permittee:
  - i. Is exempt from all provisions of Subpart Kb if the subject tank(s) stores a volatile organic liquid with a maximum true vapor pressure less than 15.0 kPa (2.18 psia).
  - ii. Must comply with the monitoring requirements of 40 CFR §60.116b(c), (d), and (f) if it stores a volatile organic liquid with a maximum true vapor pressure between 15.0 kPa (2.18 psia) and 27.6 kPa (4.0 psia).
- b. If the permittee installs any new tank while operating under this permit, it must provide notice to DEQ as required in Condition 7.5. In addition, the permittee must comply with all requirements of 40 CFR Part 60 Subpart Kb, as applicable, for any new Subpart Kb subject tank.

### 3.0 SPECIAL CONDITIONS

- 3.1. Gasoline transfer and spillage** Pursuant to OAR 340-232-0090(3)(e), the permittee must observe the following conditions:
- a. Gasoline must be handled in a manner to prevent its being discarded in sewers or stored in open containers or handled in any manner that would result in evaporation.
  - b. The permittee must address any gasoline spill of more than 5 gallons in accordance with permit Conditions 6.2 and 7.1.
- 3.2. Tank “degassing” notification requirement** The permittee must notify DEQ when it is necessary to drain and ventilate (i.e. degas) any tank that stores gasoline, ethanol, or diesel fuel as follows [OAR 340-214-0110]:
- a. Notice must be given:
    - i. At least 7 calendar days before degassing begins whenever possible; or
    - ii. As soon as possible before degassing begins if the permittee has less than 7 days advance notice themselves, such as when degassing for emergencies or sudden product changes.
  - b. DEQ must be notified by email or fax if more than 7 calendar days before degassing is planned. Notification must be both by phone and by fax or email if less than 7 calendar days before degassing is planned.
    - i. By phone call 503-229-5263;
    - ii. If the office is open, ask for the Air Quality Duty Officer and provide notice to the Duty Officer or leave a voice message with the information below;
    - iii. If the office is closed, leave a voice message with the information below.
    - iv. Send a fax addressed to “AQ Section” to 503-229-6945, or send an email to the permit writer, with the information detailed in 3.2c
  - c. Required information:
    - i. Permittee’s business name;
    - ii. Permittee’s air permit number;
    - iii. Identify which tank(s) will be degassed. Describe the size of the tank(s), and the product in the tank;

- iv. The date or dates that degassing is expected to begin, and anticipated duration of the degassing operation; and
- v. Terminal contact name and telephone number.

## 4.0 PLANT SITE EMISSION LIMITS

### 4.1. Plant Site Emission Limits (PSEL)

Plant site emissions must not exceed the following:

Pollutant	Limit	Units
PM/PM <sub>10</sub>	14	tons per year
PM <sub>2.5</sub>	9	tons per year
SO <sub>2</sub>	75	tons per year
NO <sub>x</sub>	39	tons per year
CO	99	tons per year
VOC	99	tons per year

### 4.2. Emission Limitation Period

The plant site emission limits apply to any rolling 12-consecutive month period.

## 5.0 COMPLIANCE DEMONSTRATION

### 5.1. PSEL Compliance Monitoring

Compliance with the PSEL is determined for each rolling 12-consecutive month period based on the following calculation for each pollutant:

where,

- E = pollutant emissions (ton/yr);
- EF = pollutant emission factor (see Condition 11.0);
- P = process production (see Condition 12.0)
- K<sub>AI</sub> = VOC aggregate insignificant activity emission constant (see Condition 12.0)
- K<sub>FUG</sub> = VOC equipment leak fugitive emission constant (see Condition 11.0)

- 5.2. Emission Factors** The permittee must use the default emission factors provided in Condition 11.0 for calculating pollutant emissions, unless alternative emission factors are approved by DEQ. The permittee may request or DEQ may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by DEQ.
- 5.3. Source Testing Requirements for Callidus VRU** The permittee must conduct a source test of its Callidus vapor recovery unit (VRU) as specified below:
- a. Within 12 months from the issuance date of this permit, the permittee must perform an emission performance test of the VRU to demonstrate it is capable of operating at its maximum normal operating capacity in compliance with Conditions 2.1.a and 2.1.i by conducting a source test for VOC control efficiency and emission rate (lbs VOC emitted/1000 gallons loaded).
  - b. The source test must be conducted using EPA test Methods as described in 40 CFR §60.503. The source test must be conducted in accordance with the testing procedures on file at DEQ.
  - c. The following parameters must be monitored and recorded during the source test:
    - i. The volume of gasoline dispensed through the loading rack;
    - ii. Carbon bed cycle time;
    - iii. VRU exhaust gas volume;
    - iv. Pressure within the vapor recovery system measured as close as possible to the connection with the gasoline truck;
    - v. Other operating parameters of the emission control equipment, determined at the time the pretest plan is reviewed.

- d. Only regular operating staff may adjust the control device and/or emission control parameters during the source test and within two hours prior to the source test. Any operating adjustments made during the source test, which are a result of consultation with source testing personnel, equipment vendors or consultants, may render the source test invalid.
- e. All tests must be conducted in accordance with DEQ's Source Sampling Manual and the approved pretest plan. The pretest plan must be submitted at least 15 days in advance and approved by the Regional Source Test Coordinator. Test data and results must be submitted for review to the Regional Source Test Coordinator within 45 days unless otherwise approved in the pretest plan.
- f. DEQ may approve an extension of the testing deadline in Condition 5.3a if the permittee provides adequate justification for the extension.

**5.4. Source Testing Requirements for Marine VRU**

The permittee must conduct a source test of the marine vessel vapor recovery unit (MVRU) as specified below:

- a. Within 180 days from the start-up date of the MVRU, the permittee must perform an emission performance test of the MVRU to demonstrate it is capable of operating at its maximum normal operating capacity in compliance with Condition 2.2.a by conducting a source test for VOC control efficiency and emission rate (lbs VOC emitted/1000 bbls loaded).
- b. The source test must be conducted using EPA test methods as described in 40 CFR Part 60, Appendix A. The Source Test must be conducted in accordance with a submitted source test plan or the testing procedures on file at DEQ.
- c. The following parameters must be monitored and recorded during the source test:
  - i. The volume of gasoline dispensed through the marine loading system;
  - ii. Carbon bed cycle time;
  - iii. MVRU exhaust gas volume;

- iv. Pressure within the vapor recovery system measured as close as possible to the connection with the marine vessel;
  - v. Other operating parameters of the emission control equipment, determined at the time the pretest plan is reviewed.
- d. Only regular operating staff may adjust the control device and/or emission control parameters during the source test and within two hours prior to the source test. Any operating adjustments made during the source test, which are a result of consultation with source testing personnel, equipment vendors or consultants, may render the source test invalid.
  - e. All tests must be conducted in accordance with DEQ's Source Sampling Manual and the approved pretest plan. The pretest plan must be submitted at least 15 days in advance and approved by the Regional Source Test Coordinator. Test data and results must be submitted for review to the Regional Source Test Coordinator within 45 days unless otherwise approved in the pretest plan.
  - f. DEQ may approve an extension of the testing deadline in Condition 5.4.a if the permittee provides adequate justification for the extension.
- 5.5. Opacity and Grain loading**
- a. Monitoring for opacity and grain loading limits in Conditions 1.1.a and 1.2.a is not required when the permittee burns only natural gas, propane, or butane as the boiler fuel.
  - b. Compliance with the opacity limit in Condition 1.1.a must be verified within 24 hours of each switch to a fuel other than natural gas, propane, or butane in the boilers, and must be monitored weekly for the duration of that fuel usage, using modified EPA method 9. The grain loading standard in Condition 1.2.a is assumed to be met if the opacity limit is not exceeded.

## 6.0 NESHAP COMPLIANCE DEMONSTRATION

The permittee must demonstrate compliance with the applicable requirements of 40 CFR Part 63 Subpart BBBBBB [40 CFR 63.11080 to 63.11100] (National Emission Standards for Hazardous Air Pollutants for Gasoline Distribution Bulk Terminals) as shown in the tables below (new sources must meet these requirements when they are placed in service):

**Table 1 to Subpart BBBBBB of Part 63—Applicability Criteria, Emission Limits, and Management Practices for Storage Tanks**

If you own or operate	Then you must
1. A gasoline storage tank with a capacity of less than 75 cubic meters (m <sup>3</sup> )	Equip each gasoline storage tank with a fixed roof that is mounted to the storage tank in a stationary manner, and maintain all openings in a closed position at all times when not in use.
2. A gasoline storage tank with a capacity of greater than or equal to 75 m <sup>3</sup>	(a) Reduce emissions of total organic HAP or TOC by 95 weight-percent with a closed vent system and control device as specified in 40 CFR 60.112b(a)(3); or
	(b) Equip each internal floating roof gasoline storage tank according to the requirements in 40 CFR 60.112b(a)(1), except for the secondary seal requirements under 40 CFR 60.112b(a)(1)(ii)(B) and the requirements in 40 CFR 60.112b(a)(1)(iv) through (ix); and
	(c) Equip each external floating roof gasoline storage tank according to the requirements in 40 CFR 60.112b(a)(2), except that the requirements of 40 CFR 60.112b(a)(2)(ii) shall only be required if such storage tank does not currently meet the requirements of 40 CFR 60.112b(a)(2)(i); or
	(d) Equip and operate each internal and external floating roof gasoline storage tank according to the applicable requirements in 40 CFR 63.1063(a)(1) and (b), and equip each external floating roof gasoline storage tank according to the requirements of 40 CFR 63.1063(a)(2) if such storage tank does not currently meet the requirements of 40 CFR 63.1063(a)(1).

**Table 2 to Subpart BBBBBB of Part 63—Applicability Criteria, Emission Limits, and Management Practices for Loading Racks**

If you own or operate	Then you must
1. A gasoline loading rack(s) at a bulk gasoline terminal with a gasoline throughput of 250,000 gallons per day, or greater	(a) Equip loading rack(s) with a vapor collection system designed to collect the TOC vapors displaced from cargo tanks during product loading; and
	(b) Reduce emissions of TOC to less than or equal to 80 mg/l of gasoline loaded into gasoline cargo tanks at the loading rack; and
	(c) Design and operate the vapor collection system to prevent any TOC vapors collected at one loading rack from passing to another loading rack; and



If you own or operate	Then you must
	(d) Limit the loading of gasoline into gasoline cargo tanks that are vapor tight using the procedures specified in 40 CFR 60.502(e) through (j). For the purposes of this section, the term “tank truck” as used in 40 CFR 60.502(e) through (j) means “cargo tank” as defined in 40 CFR 63.11100.
2. A gasoline loading rack(s) at a bulk gasoline terminal with a gasoline throughput of less than 250,000 gallons per day	(a) Use submerged filling with a submerged fill pipe that is no more than 6 inches from the bottom of the cargo tank. (b) Make records available within 24 hours of a request by the Administrator to document your gasoline throughput.

## 7.0 RECORDKEEPING REQUIREMENTS

- 7.1. Operation and Maintenance** The permittee must maintain the following records related to the operation and maintenance of the plant and associated air contaminant control devices:

Monitoring Parameters	Monitoring Frequency
a. Volatile organic liquid type and period of storage, for each storage tank.	As performed
b. The amount and type of volatile organic liquid loaded into or withdrawn from each storage tank	As performed
c. Maximum Reid vapor pressure for gasoline and any volatile organic liquid that has a RVP equal or greater than gasoline stored in each storage tank during the period of storage. [volatile organic liquid is a volatile organic compound in the liquid phase]	Each storage period
d. The HAP content (percent by weight) of each product terminalled (%HAP content is to be monitored based on individual HAPs).	Each product formulation change
e. The type and amount of volatile organic liquid loaded into marine vessels.	Each loading event
f. The type and amount of refined petroleum products dispensed through the truck loading rack.	Monthly
g. The type and amount of fuel combusted in the steam generating boilers.	Monthly

	Monitoring Parameters	Monitoring Frequency
h.	<p>The sulfur content of each lot of fuel oil received for sale, distribution, or use (combustion in the steam generating boilers).</p> <p>Sulfur content must be determined by one of the following methods:</p> <ul style="list-style-type: none"> <li>Analyze a composite sample of a new lot of fuel using ASTM D129-64, D1552-83, D4057-81, 2622, or other method approved in writing by DEQ;</li> <li>Obtain a certificate of analysis for sulfur content from the fuel oil vendor or third party laboratory;</li> <li>If used oil is combusted, the permittee must obtain analyses from the marketer or, if generated on site, have the used oil analyzed, so that it can be demonstrated that each shipment of oil does not exceed the used oil specifications contained in 40 CFR Part 279.11, Table 1.</li> </ul>	Each receipt
i.	Perform a 12-month rolling emission rate calculation to demonstrate compliance with the PSEL emission rate limits of Condition 4.0. Rolling emission rate calculations must be performed in accordance with the calculation methods of Conditions 5.1 and 5.2.	Monthly
j.	Excess emission records as defined in OAR 340-214-0300 through 340-214-0340.	Each Occurrence
k.	Records of air quality related complaints received by permittee and results of corresponding investigation/resolution.	Each Occurrence
l.	Records of major maintenance performed on air pollution control equipment.	Each Occurrence

- 7.2. Excess Emissions** The permittee must maintain records of excess emissions as defined in OAR 340-214-0300 through 340-214-0340 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must cease operation of the equipment or facility no later than 48 hours after the beginning of the excess emissions, unless continued operation is approved by DEQ in accordance with OAR 340-214-0330(4).

- 7.3. Complaint Log** The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.
- 7.4. Retention of Records** Unless otherwise specified, all records must be maintained on site for a period of five (5) years and made available to DEQ upon request.

## 8.0 REPORTING REQUIREMENTS

- 8.1. Excess Emissions** The permittee must notify DEQ by telephone or in person of any excess emissions which are of a nature that could endanger public health.
- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 9.5.
  - b. If the excess emissions occur during non-business hours, the permittee must notify DEQ by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
  - c. The permittee must also submit follow-up reports when required by DEQ.
- 8.2. Annual Report** For each year this permit is in effect, the permittee must submit to DEQ by **February 15**, two (2) copies of the following information for the previous calendar year:
- a. Operating parameters:
    - i. A letter stating the facility's compliance status with permit conditions for the previous calendar year.
    - ii. The total amount of natural gas (MMft<sup>3</sup>) combusted in the boilers.
    - iii. The total amount (gal) and type of fuel oil combusted in the boilers.
    - iv. The total amount of gasoline received into storage tanks (bbls per year).
    - v. The amount of gasoline loaded into tank trucks (gallons/yr).

- vi. The total amount of gasoline loaded into marine vessels, (bbls or gal/year).
  - vii. The calculated PM/PM<sub>10</sub>/PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC 12-month rolling emission rates for each month of the previous calendar year. Calculations must be performed following the calculation method in Conditions 5.1 and 5.2.
- b. An evaluation of the permittee's HAP potential to emit (as limited by the overall VOC PSEL) based upon formulation changes documented for Condition 7.1.d.
  - c. Records of all planned and unplanned excess emissions events.
  - d. Summary of complaints relating to air quality received by permittee during the year.
  - e. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
  - f. List major maintenance performed on pollution control equipment.
- 8.3. Greenhouse Gas Registration and Reporting** If the calendar year emission rate of greenhouse gases (CO<sub>2</sub>e) is greater than or equal to 2,756 tons (2,500 metric tons), the permittee must register and report its greenhouse gas emissions with DEQ in accordance with OAR 340-215.
- 8.4. Notice of Change of Ownership or Company Name** The permittee must notify DEQ in writing using a DEQ "Permit Application Form" within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
  - b. Sale or exchange of the activity or facility.
- 8.5. Construction or Modification Notices** The permittee must notify DEQ in writing using a DEQ "Notice of Construction Form," or "Permit Application Form," and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:
- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;

- b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. Constructing or modifying any air pollution control equipment.

**8.6. Where to Send Reports and Notices** The reports, with the permit number prominently displayed, must be sent to the Permit Coordinator for the region where the source is located as identified in Condition 9.3.

## 9.0 ADMINISTRATIVE REQUIREMENTS

**9.1. Permit Renewal Application** The completed application package for renewal of this permit is due one hundred and eighty (180) days prior to expiration. Two (2) copies of the application must be submitted to the DEQ Permit Coordinator listed in Condition 8.3

**9.2. Permit Modifications** Application for a modification of this permit must be submitted not less than **60** days prior to the source modification. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the DEQ Business Office.

**9.3. Permit Coordinator Address** All reports, notices, and applications (without associated fees) should be directed to the Permit Coordinator of the DEQ's Northwest Regional Office. The address is as follows:

Department of Environmental Quality  
Northwest Region  
700 NE Multnomah St., Suite 600  
Portland, OR 97232  
Telephone: (503) 229-5582

**9.4. Department Contacts - Internet** Information about air quality permits and DEQ's regulations may be obtained from the DEQ web page at [www.deq.state.or.us](http://www.deq.state.or.us).

- 9.5. Department Contacts - General** All inquiries about this permit should be directed to the DEQ's Northwest Regional Office. The address and phone number are as follows:

Department of Environmental Quality  
Northwest Regional Office  
700 NE Multnomah St., Suite 600  
Portland, OR 97232  
Telephone: (503) 229-5554

## 10.0 FEES

- 10.1. Annual Compliance Fee** The Annual Fee specified in OAR 340-216-8020, Table 2, Part 2 for a Standard ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined DEQ regulations will be mailed prior to the above date. **Late fees in accordance with Part 4 of the table will be assessed as appropriate.**
- 10.2. Change of Ownership or Company Name Fee** The non-technical permit modification fee specified in OAR 340-216-8020, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company.
- 10.3. Special Activity Fees** The special activity fees specified in OAR 340-216-8020, Table 2, Part 3 (b through i) are due with an application to modify the permit.
- 10.4. Where to Submit Fees** Fees must be submitted to:  
Department of Environmental Quality  
Accounting Office  
700NE Multnomah St Ste 600  
Portland OR 97232

## 11.0 GENERAL CONDITIONS AND DISCLAIMERS

- 11.1. Permitted Activities** This permit allows the permittee to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, or is revoked.
- 11.2. Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by DEQ.

- 11.3. Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 11.4. Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.
- 11.5. DEQ Access** The permittee must allow DEQ's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.
- 11.6. Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 11.7. Open Burning** The permittee may not conduct any open burning except as allowed by OAR 340 Division 264.
- 11.8. Asbestos** The permittee must comply with the asbestos abatement requirements in OAR 340, Division 248 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 11.9. Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

- 11.10. Permit Expiration**
- a. A source may not be operated after the expiration date of the permit, unless any of the following occur prior to the expiration date of the permit:
- A timely and complete application for renewal or for an Oregon Title V Operating Permit has been submitted, or
  - Another type of permit (ACDP or Oregon Title V Operating Permit) has been issued authorizing operation of the source.
- b. For a source operating under an ACDP or Oregon Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially.

- 11.11. Permit Termination, Revocation, or Modification**
- DEQ may modify or revoke this permit pursuant to OAR 340-216-0082 and 340-216-0084.

## 12.0 EMISSION FACTORS

Process	Pollutant	Monitoring Parameter (P)	Emissions Factor (EF)	Emissions Factor Units
Boilers (natural gas)	PM/PM <sub>10</sub> /PM <sub>2.5</sub> <sup>(1)</sup>	MM ft <sup>3</sup> of natural gas combusted	2.5	lbs/MM ft <sup>3</sup>
	SO <sub>2</sub>	MM ft <sup>3</sup> of natural gas combusted	1.7	lbs/MM ft <sup>3</sup>
	NO <sub>x</sub>	MM ft <sup>3</sup> of natural gas combusted	100	lbs/MM ft <sup>3</sup>
	CO	MM ft <sup>3</sup> of natural gas combusted	84	lbs/MM ft <sup>3</sup>
	VOC	MM ft <sup>3</sup> of natural gas combusted	5.5	lbs/MM ft <sup>3</sup>
Boilers (fuel oil)	PM/PM <sub>10</sub> /PM <sub>2.5</sub> <sup>(1)</sup>	Gallons of fuel oil combusted	Distillate oil - 3.3 Resid. oil - 20.8	lbs/1000 gal
	SO <sub>2</sub>	Gallons of fuel oil combusted	Distillate oil - 71 <sup>(2)</sup> Resid. oil - 274.8 <sup>(3)</sup>	lbs/1000 gal
	NO <sub>x</sub>	Gallons of fuel oil combusted	Distillate oil - 20 Resid. oil - 55	lbs/1000 gal
	CO	Gallons of fuel oil combusted	Distillate oil - 5 Resid. oil - 5	lbs/1000 gal
	VOC	Gallons of fuel oil combusted	Distillate oil - 0.2 Resid. oil - 0.28	lbs/1000 gal
Storage tanks	VOC	Monitor gallons of	Use TANKS	tons/yr



Process	Pollutant	Monitoring Parameter (P)	Emissions Factor (EF)	Emissions Factor Units
		throughput for respective 12-month period	software or AP-42 algorithms for 12-month emission rate calculation <sup>(4)</sup>	
Refined products truck loading rack	VOC	Gallons loaded	Gas – 0.011 <sup>(8)</sup> Distillate <sup>(6)</sup>	lbs/1000 gal
Refined products truck loading rack fugitives	VOC	Gallons loaded	Gas <sup>(5)</sup> Distillate <sup>(6)</sup>	lbs/1000 gal
Marine loading	VOC	Gallons loaded	Distillate oil – 0.012 Jet Kerosene – 0.013 Resid. oil <sup>(6)</sup>	lbs/1000 gal
Process Oil/water separator	VOC	Gallons of throughput	TBD	lbs/1000 gal
Equipment Leaks	VOC	Equipment leak constant (K <sub>FUG</sub> )	3.6	tons/yr
Aggregate Insignificant activities <sup>(7)</sup>	VOC	Activity constant (K <sub>AI</sub> )	1	tons/yr

- All PM from fuel combustion is presumed to be PM<sub>10</sub> and also PM<sub>2.5</sub>
- Permittee may determine emission factor based upon weighted average fuel oil sulfur content of all distillate fuel oil combusted during emission calculation period using the following formula: 142(S).
- Permittee may determine emission factor based upon weighted average fuel oil sulfur content of all residual fuel oil combusted during emission calculation period using the following formula: 157(S).
- Algorithms are referenced in Appendix A of this permit.
- Factor includes a presumed vapor collection efficiency of 98.7% (fugitive emission rate of 1.3%). Factor may be determined using AP-42 formula:

$$\text{Loading loss} = 12.46 \frac{SPM}{T} \left[ 1 - \frac{eff}{100} \right]$$

Where:

S = saturation factor  
P = true vapor pressure  
M = molecular weight of vapor  
T = temperature (°R)  
eff = reduction efficiency

- Emissions are negligible and are included as an insignificant activity component.
- Aggregate insignificant emission sources consist of the following sources: lube plant tanks, truck fueling at refined products loading rack (diesel), lube oil truck loading rack (top loading of finished lube oils and some base stocks), black oil/RFO loading rack, diesel/black oil pump off area, lube oil truck unloading area, lube oil additive truck unloading area, gasoline additive truck unloading area, rail car loading (lube oil and base oils), rail car unloading (fuel oils; decant, cutter, RFO), stormwater separators, and lube plant facility fugitive emissions.
- This factor may be adjusted based on the latest approved source test results.

## 13.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	O <sub>2</sub>	oxygen
ASTM	American Society for Testing and Materials	OAR	Oregon Administrative Rules
AQMA	Air Quality Maintenance Area	ORS	Oregon Revised Statutes
calendar year	The 12-month period beginning January 1st and ending December 31st	O&M	operation and maintenance
CFR	Code of Federal Regulations	Pb	lead
CO	carbon monoxide	PCD	pollution control device
DEQ	Oregon Department of Environmental Quality	PM	particulate matter
dscf	dry standard cubic foot	PM <sub>10</sub>	particulate matter less than 10 microns in size
EPA	US Environmental Protection Agency	ppm	part per million
FCAA	Federal Clean Air Act	PSD	Prevention of Significant Deterioration
gal	gallon(s)	PSEL	Plant Site Emission Limit
gr/dscf	grains per dry standard cubic foot	PTE	Potential to Emit
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	RACT	Reasonably Available Control Technology
I&M	inspection and maintenance	scf	standard cubic foot
lb	pound(s)	SER	Significant Emission Rate
MMBtu	million British thermal units	SIC	Standard Industrial Code
NA	not applicable	SIP	State Implementation Plan
NESHAP	National Emissions Standards for Hazardous Air Pollutants	SO <sub>2</sub>	sulfur dioxide
NO <sub>x</sub>	nitrogen oxides	Special Control Area	as defined in OAR 340-204-0070
NSPS	New Source Performance Standard	TACT	Typically Achievable Control Technology
NSR	New Source Review	VE	visible emissions
		VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months



State of Oregon  
Department of  
Environmental  
Quality

Department of Environmental Quality  
Northwest Region  
Air Quality Program

Standard  
AIR CONTAMINANT DISCHARGE PERMIT

**Source Information:**

SIC	5171, 2992, 4961
NAICS	424710, 221330

Source Categories (Table 1 Part, code)	B-34
Public Notice Category	II

**Compliance and Emissions Monitoring Requirements:**

FCE	Yes
Compliance schedule	
Unassigned emissions	Yes
Emission credits	
Special Conditions	

Source test [date(s)]	w/in 12 months
COMS	
CEMS	
PEMS	
Ambient monitoring	

**Reporting Requirements**

Annual report (due date)	2/15
Quarterly report (due dates)	

Monthly report (due dates)	
Excess emissions report	
Other (specify)	

**Air Programs**

Synthetic Minor (SM)	
SM -80	Yes
NSPS (list subparts)	Kb
NESHAP (list subparts)	BBBBBB
Part 68 Risk Management	
CFC	

NSR	
PSD	
RACT	Yes
TACT	
Other (specify)	

## TABLE OF CONTENTS

PERMITTING .....	3
SOURCE DESCRIPTION.....	3
COMPLIANCE.....	5
EMISSIONS .....	5
MAJOR SOURCE APPLICABILITY .....	6
ADDITIONAL REQUIREMENTS.....	7
SOURCE TESTING.....	8
PUBLIC NOTICE.....	8

## PERMITTING

### PERMITTING ACTION

1. The permit is a renewal of an existing Air Contaminant Discharge Permit (ACDP) which was issued on Oct. 9, 2008; modified with a name change on May 29, 2012; modified to include the specific language for Marine Vessel loading on March 12, 2013 and was originally scheduled to expire on April 4, 2013.

### OTHER PERMITS

2. Other permits issued or required by DEQ for this source include a 1200-Z NPDES General Permit.

### ATTAINMENT STATUS

3. The facility is located in a maintenance area for carbon monoxide (CO) and ozone. Oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOC) are precursors of ozone. The area is in attainment for all other pollutants. As permitted, the facility is an insignificant source of CO and a moderate source of NO<sub>x</sub> and VOC.

## SOURCE DESCRIPTION

### OVERVIEW

4. The permittee operates a bulk gasoline terminal located at 5528 NW Doane Avenue in Portland. In 2012 the facility name was changed from ConocoPhillips to Phillips 66. The facility was previously owned and operated by Tosco Corporation and Phillips Petroleum Company. The terminal has 118 storage tanks for approximately 854,885 barrels of storage tank capacity. The products that are stored and loaded at the facility may include, but are not limited to, gasoline, diesel, fuel/heating oil, ethanol, lube oils and other common commercially available bulk organic liquid products. Organic vapors from the truck loading rack (gasoline/diesel) are controlled by a dual-bed carbon adsorption vapor recovery unit (VRU).

Organic liquid products are stored predominantly in fixed-roof above-ground storage tanks at the facility. Storage tanks having capacity of greater than 39,000 gallons and storing a volatile organic compound (VOC) liquid with a true vapor pressure greater than 1.52 psia, as stored, at actual monthly average storage temperatures, are equipped with internal floating covers having at least a primary seal.

PROCESS AND CONTROL DEVICES

5. Existing air contaminant sources at the facility consist of the following:

AMT	EQUIPMENT	MFG/MODEL	CAPACITY/ PROD. RATE	CONTROL EQUIPMENT	INSTALLED/ MODIFIED
118	Fixed-roof tanks	Various	Various	Roof, seals	Various
1	Refined Products Truck Loading Rack	NA (Custom)	5400 gal/min (600 gal/min /arm x 9)	Carbon Bed VRU	1999
1	Fuel (Black Oil) Truck Loading Rack	NA (Custom)	500 gal/min	None	1950s
1	Non-gasoline Marine Loading	NA (Custom)	3,600 gal/min	None	1950s
4	Oil/Water Separators	Custom	Various	None	Various
1	Fugitive	Unknown	Various	None	Various
2	Boilers	Erie City Cleaver Brooks	58 MMBtu/hr 14.6 MMBtu/hr	None	1973 1984
2	Railcar & lube oil loading	Custom	250 gal/min	Railcar & lube oil loading uncontrolled	1974
1	Gasoline marine loading	TBD	TBD	MVRU	Proposed and approved

CONTINUOUS MONITORING DEVICES

6. The facility has the following continuous monitoring devices:

Organic vapor analyzer for VRU exhaust gas emissions.

Organic vapor analyzer for MVRU exhaust gas emissions, to be installed when MVRU is installed and marine loading of gasoline commences.

## COMPLIANCE

7. The facility was inspected on 9/16/2008 and 10/29/2010 and found to be in compliance with all conditions of the permit.
8. During the prior permit period there were no complaints recorded for this facility.
9. No enforcement actions have been taken against this source since the last permit renewal.

## EMISSIONS

10. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits <sup>(a)</sup> (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
PM/PM <sub>10</sub> <sup>(b)</sup>	1.1	1	1	14	14	0
PM <sub>2.5</sub>	NA	NA	1	NA	9	9
SO <sub>2</sub>	1	75	75	75	75	0
NO <sub>x</sub>	11.3	8	8	39	39	0
CO	2.8	7	7	99	99	0
VOC	726.4	119	119	99	99	0

- a. The PSEL is a federally enforceable limit on the potential to emit.
- b. Particulate matter is produced as a product of combustion (boiler operation) and is presumed to be all PM<sub>2.5</sub>.

11. In addition to the PSEL, the permit includes the following:

Pollutant	Unassigned Emissions (tons/yr)	Emission Reduction Credits (tons/yr)
VOC	20	NA

- a. The permittee has 20 tons of unassigned VOC emissions. The unassigned emissions are attributed to Phillip 66's decision to accept federally enforceable permit conditions that limit its PTE to levels below Title V major source thresholds. The unassigned emissions are the difference between netting basis and the recognized PTE. Before it can utilize the unassigned emissions, the permittee must first obtain a Title V operating permit.

### AGGREGATE INSIGNIFICANT EMISSIONS

12. Analysis of VOC emissions from the following sources at the terminal found the associated emissions to be negligible: lube plant tanks, truck fueling at refined products loading rack (diesel), lube oil truck loading rack (top loading of finished lube oils and some base stocks), black oil/RFO loading rack, diesel/black oil pump off area, lube oil truck unloading area, lube oil additive truck unloading area, gasoline additive truck unloading area, rail car loading (lube oil and base oils), rail car unloading (fuel oils; decant, cutter, RFO), marine vessel offloading (gasoline, diesel, and fuel oils), ethanol truck unloading, and lube plant facility fugitive emissions. For purposes of emission compliance determination calculations, the identified sources and their emissions have been grouped together in the permit as “aggregate insignificant emissions.” When all of the identified aggregate insignificant emissions are combined it results in less than one ton of hydrocarbon emissions annually. When performing PSEL compliance calculations, the permittee must account for VOC emissions from the activities identified above by including 1 ton per year aggregate insignificant emissions in the compliance calculation with the 1 ton divided equally between the twelve months of the year.

### SIGNIFICANT EMISSION RATE ANALYSIS

13. For each pollutant, the proposed Plant Site Emission Limit is less than the Netting Basis plus the significant emission rate, thus no further air quality analysis is required.

## MAJOR SOURCE APPLICABILITY

### CRITERIA POLLUTANTS

14. A major source is a facility that has the potential to emit more than 100 tons per year of any criteria pollutant. Although the source has the capacity to emit above the Title V major source threshold levels, the permittee has elected not to obtain an Oregon Title V Operating Permit by requesting a PSEL below the major source threshold levels. The PSEL is a federally enforceable limit on PTE.

### HAZARDOUS AIR POLLUTANTS

15. The permittee handles products that contain components that are listed as Hazardous Air Pollutants (HAPs) in Section 112(b) of the Federal Clean Air Act and OAR 340-244-0040, Table 1. Using mass balance calculations, the permittee determined that when total VOC emissions are limited to 99 tons/year its potential to emit of HAPs are below the major source thresholds (major source threshold for HAPs = potential to emit 10 or more tons of any single HAP or 25 or more tons of any combination of HAPs) of the Title V Federal Operating Permit program. The permit contains conditions requiring the permittee to monitor HAP content of terminal products to ensure that changes in product formulations do not threaten the facility’s minor source status.



At the time of permit issuance, actual maximum HAP emissions were estimated to be less than 3 tons/yr of total combined HAPs.

## ADDITIONAL REQUIREMENTS

### NSPS APPLICABILITY

16. The permittee has 2 storage tanks which are affected facilities under the federal New Source Performance Standards (NSPS) **40 CFR Part 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984**. The subject tanks have a capacity of 20,000 gallons each. Due to the small individual size of the tanks and the low true vapor pressure of the stored product (< 2.18 psia – associated with the 20,000 gallon tanks only), the only applicable requirement is for the permittee to maintain a permanent record of each tank’s dimensions and an analysis of each tank’s storage capacity. Tanks that are constructed or reconstructed after July 23, 1984 may also become subject to the NSPS.

NSPS Kb Subject Tanks					
Tank No.	Year Constructed	Capacity (gal)	Tank No.	Year Constructed	Capacity (gal)
4436	1990	20,000	4437	1990	20,000

### NESHAPS/MACT APPLICABILITY

17. The facility is subject to federal National Emissions Standards for Hazardous Air Pollutants (NESHAPs) – 40 CFR Part 63 Subpart BBBBBB (63.11080 to 63.11100). Initial notification of applicability has been received by DEQ.

### RACT APPLICABILITY

18. The facility is located in the Portland AQMA and the following RACT requirements apply:
- OAR 340-232-0085 - regulations for gasoline delivery vessels;
  - OAR 340-232-0090 - regulations for bulk gasoline terminals;
  - OAR 340-232-0100 - regulations for testing vapor transfer and collection systems; and
  - OAR 340-232-0150 - regulations for liquid (volatile organic) storage.

### TACT APPLICABILITY

19. The source is not subject to the state’s TACT/Highest and Best Rules since it is subject to and complying with the RACT regulations identified above.

## SOURCE TESTING

### PRIOR TESTING RESULTS

20. The results of the most recent source tests are listed below:

<b>Emission Device</b>	<b>Test Date</b>	<b>Pollutant</b>	<b>Measured Value</b>
Callidus VRU	4/17/2009	VOC	0.008 lb/1000 gallons loaded
Callidus VRU	12/03/2003	VOC	0.011 lb/1000 gallons loaded
Callidus VRU	04/28/2000	VOC	0.0067 lb/1000 gallons loaded
Callidus VRU	09/17/1999	VOC	0.008 lb/1000 gallons loaded

### PROPOSED TESTING

21. The Callidus Technologies VRU will be tested within twelve months from date of permit issuance.
22. The Marine Vapor Recovery Unit will be tested within 180 days of initial startup.

### PUBLIC NOTICE

23. Pursuant to OAR 340-216-0066(4)(a)(A), renewals of Standard Air Contaminant Discharge Permits require public notice in accordance with OAR 340-209-0030(3)(b). The proposed permit is on public notice for a 30-day period from Aug. 3, 2017 to Thursday Sept.14, 2017 at 5 p.m.

dpk:

Phillips66RR.doc

8/3/2017