

TECHNICAL SUPPORT DOCUMENT

TECHNICAL INFORMATION PRESENTED IN REVIEW OF AN  
APPLICATION FOR A PART 70 OPERATING PERMIT

SUBMITTED BY

KINDER MORGAN ENERGY PARTNERS, LP

for

CALNEV PIPE LINE, LLC

**Part 70 Operating Permit Number: 13  
(Minor Revision)**

SIC Code 4226: Petroleum and Chemical Bulk Stations and Terminals for Hire  
NAICS: 424710: Petroleum Bulk Stations and Terminals



Clark County  
Department of Air Quality  
Permitting Section

**May 2015**

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## EXECUTIVE SUMMARY

The Calnev Pipeline LLC (Calnev) Las Vegas site is a bulk fuel transfer facility that began operations in 1961 and is located in the Las Vegas Valley, Hydrographic Area 212. Calnev is classified as a Categorical Stationary Source, as defined by AQR 12.2.2(j)(23): Petroleum storage and transfer units with total storage capacity exceeding 300,000 barrels. Calnev is a major stationary source of VOC emissions and a minor source for all other criteria pollutants. The Calnev facility emits particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), sulfur oxides (SO<sub>x</sub>), volatile organic compounds (VOC) and hazardous air pollutants (HAP) as a result of the storage of petroleum fuels, combustion of propane and diesel, haul road traffic and from a large soil and groundwater remediation project.

Fuels are delivered to the site by two underground pipelines originating in southern California. Incoming fuels are diverted to storage tanks. From these storage vessels fuels are piped to other terminals (e.g. Rebel, Nellis AFB) or to delivery trucks. As the trucks are fueled, specialized additives are injected according to customer's specifications. These fuel additives arrive at the facility via truck or rail.

The facility was subject to the Lowest Achievable Emission Rate (LAER) for all VOC emissions and was subject to the Best Available Control Technology (BACT) for all other pollutants. The facility has been determined to have met the requirements for LAER and BACT for the criteria pollutants. Currently, the area is attainment for all criteria pollutants.

**Table 1: Source PTE (tons per year)**

PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP
7.42	0.04	2.60	2.87	0.17	186.87	10.43

The Part 70 Operating Permit (Part 70 OP) was renewed on December 16, 2011 and a minor revision was issued on December 20, 2012. On June 20, 2013, the Permittee was issued a minor revision of the operating permit for the addition of three (3) additive tanks and a slotted guide pole on Tank LV-538 (EU: A09). Source notified Air Quality of some missing information in this operating permit and Air Quality initiated an administrative revision of the permit on July 8, 2013 to incorporate the missing information. The administrative revision was issued on August 23, 2013. On April 22, 2014, Calnev submitted an application for a minor revision to correct deficiencies discovered during an inspection. That revision was issued September 23, 2014. This action is a minor revision to increase the RVP in multifuel tanks from 10 to 11. This application was received on April 21, 2015.

This Technical Support Document (TSD) accompanies the Part 70 OP prepared by Department of Air Quality for Calnev. Based on information submitted by the applicant and a technical review performed by staff, Air Quality proposes the issuance of a minor revision of the Part 70 OP.

## I. ACRONYMS

**Table I-1: List of Acronyms and Abbreviations**

<b>Acronym</b>	<b>Term</b>
Air Quality	Clark County Department of Air Quality
AQR	Clark County Air Quality Regulations
BACT	Best Available Control Technology
CO	Carbon Monoxide
EPA	United States Environmental Protection Agency
EU	Emission Unit
FR	Fixed Roof
HAP	Hazardous Air Pollutant
LAER	Lowest Achievable Emissions Rate
NO <sub>x</sub>	Nitrogen Oxides
NSR	New Source Review
OP	Operating Permit
PM <sub>10</sub>	Particulate Matter less than 10 microns
PM <sub>2.5</sub>	Particulate Matter less than 2.5 microns
PTE	Potential to Emit
SIC	Standard Industrial Classification
SO <sub>x</sub>	Sulfur Oxides
VOC	Volatile Organic Compound

## II. SOURCE INFORMATION

### A. General

Permittee	Kinder Morgan Energy Partners, LP
Mailing Address	1100 Town and Country Road, Orange, California 92868
Responsible Official	Phillip Vasquez
Telephone Numbers	Source: 702-643-9130; FAX: 702-644-2236
	Company: 714-560-4905; FAX: 714-560-6589
Source Location	5049 Sloan Lane, Las Vegas, Nevada 89115
Hydrographic Area	Las Vegas Valley 212
Township, Range, Section	T19S, R62E, Section 34

### B. Current Permitting Action

Calnev is regulated by the Clark County Department of Air Quality (Air Quality). The facility is a major source of VOC emissions. Calnev submitted an application for the Part 70 OP renewal on September 28, 2007, and the renewed Part 70 OP was issued on December 16, 2011 and a minor permit revision was issued on June 20, 2013. An administrative revision was issued on August 23, 2013 to incorporate some missing information from the previous permitting action. On April 22, 2014, Calnev submitted an application for an Authority to Construct under the provisions of AQR 12.4. The emission increase was less than the minor NSR significance listed in AQR 12.4. According to AQR 12.4.3.2(b), this modification of the source was considered a minor revision of the Title V operating permit and was issued September 23, 2014.

The current application for an Authority to Construct under the provisions of AQR 12.4 was received on April 21, 2015 to increase the RVP in all multifuel tanks from 10 to 11. According to AQR 12.4.3.2(b), this modification of the source was considered a minor revision of the Title V operating permit.

Since the 12-month rolling average RVP for the gasoline is based on the actual analysis data, the source did not discover the need to increase the RVP limit until recently. The source looked into this matter, and it appeared that the RVP increase was related to the relaxation of wintertime gasoline in Clark County by the State of Nevada. Prior to 2010, Calnev distributed gasoline with RVP of 9.0 psi during the winter months (October 1 – March 31) to meet the requirements of Nevada Administrative Code 590.065 that limits the RVP in gasoline fuel sold in Clark County to 9.0 psi during the winter months. During that time, the annual-average RVP of gasoline distributed by Calnev was 10 psi.

After the USEPA approved to amend the RVP limit from 9.0 psi to 13.5 psi during the winter months, Calnev started to distribute gasoline with RVP of 13.5 during the winter months. This increased the annual-average RVP of gasoline distributed by Calnev; therefore, Calnev requested to increase the RVP limit from 10 to 11 psi. A table showing the before and after VOC PTE for the multifuel tanks is shown below.

EU	Tank Number	Permitted Product	VOC PTE (tons/yr)	
			Pre Modification (RVP 10)	Post Modification (RVP 11)
A01	530	multi fuel	1.48	1.33
A02	531	multi fuel	1.53	1.41
A03	532	multi fuel	1.28	1.14
A04	533	multi fuel	1.46	1.33
A05	534	multi fuel	1.28	1.14
A06	535	multi fuel	1.28	1.14
A07	536	multi fuel	1.73	1.65
A08	537	multi fuel	1.85	1.88
A09	538	multi fuel	1.60	2.76
A10	539	multi fuel	1.37	1.38
A11	540	multi fuel	1.45	1.54
A12	541	multi fuel	1.78	1.86
A13	524	multi fuel	1.52	0.65
A16	545	multi fuel	1.89	2.18
A17	546	multi fuel	3.02	2.81
A21	547	multi fuel	3.07	2.81
A28	523	multi fuel	1.35	1.53
A29	544	multi fuel	1.34	1.72
A45	548	multi fuel	1.37	1.61
A46	549	multi fuel	1.35	1.04
A47	550	multi fuel	1.56	2.07
A48	551	multi fuel	0.96	1.75
A58	553	multi fuel	3.83	4.36
A59	554	multi fuel	3.07	4.97
A60	555	multi fuel	3.07	4.63
A61	552	multi fuel	2.06	2.26
B04	500	multi fuel	1.85	0.45
B05	521	multi fuel	1.07	1.24
<b>Total</b>			<b>50.47</b>	<b>54.63</b>

Air Quality accepted this request and made corresponding changes in the permit.

PTE and Emissions Increase Calculation

There is an increase in all multifuel tanks emissions due to the change in RVP. There is concurrently a decrease in some of these tanks due to rim-seal and deck fitting upgrades. The overall increase is below the significant threshold of VOC under AQR 12.2 and below the minor

NSR significance under AQR 12.4. Therefore, under 12.4.3.2(b), the proposed change is a minor revision of the Title V permit

The recalculated Source PTE is:

<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>VOC</b>	<b>HAP</b>
<b>7.42</b>	<b>0.04</b>	<b>2.60</b>	<b>2.87</b>	<b>0.17</b>	<b>186.87</b>	<b>10.43</b>

There was also an increase in HAP. The increase in HAP is less than 0.01 tons per year. The new source total remains below the major source threshold for HAP.

#### Regulatory Analysis

The proposed change is a minor revision of the Part 70 OP. The emission increase is less than the significance threshold and there is no control analysis triggered by this action. No new applicable NSPS or NESHAP has been promulgated or revised.

#### Other Actions Taken by Air Quality

- Revised General Conditions to current standard language
- Revised the 12-month rolling limits to current standard language

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**Table 1: Source PTE (tons per year)**

PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP
<b>7.42</b>	<b>0.04</b>	<b>2.60</b>	<b>2.87</b>	<b>0.17</b>	<b>182.71</b>	<b>10.32</b>

The Part 70 Operating Permit (OP) was renewed on December 16, 2011 and a minor revision was issued on December 20, 2012. On June 20, 2013, the Permittee was issued a minor revision of the operating permit for the addition of three (3) additive tanks and a slotted guide pole on Tank LV-538 (EU: A09). Source notified Air Quality of some missing information in this operating permit and Air Quality initiated an administrative revision of the permit on July 8, 2013 to incorporate the missing information. The administrative revision was issued on August 23, 2013. On April 22, 2014, Calnev submitted an application for a minor revision.

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## I. ACRONYMS

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<b>Acronym</b>	<b>Term</b>
AQIA	Air Quality Impacts Analysis
Air Quality	Clark County Department of Air Quality
AQR	Clark County Air Quality Regulations
AST	Above Ground Storage Tank
ATC	Authority to Construct
ATC/OP	Authority to Construct/Operating Permit
BACT	Best Available Control Technology
CAAA	Clean Air Act, as amended, or Clean Air Act Amendments
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emissions Monitoring System
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
EPA	United States Environmental Protection Agency
EU	Emission Unit
FR	Fixed Roof
HAP	Hazardous Air Pollutant
HP	Horse Power
kW	kilowatt
LAER	Lowest Achievable Emissions Rate
MACT	Maximum Achievable Control Technology
M/N	Model Number
NAICS	North American Industry Classification System
NO <sub>x</sub>	Nitrogen Oxides
NRS	Nevada Revised Statutes
NSR	New Source Review
PM <sub>10</sub>	Particulate Matter less than 10 microns
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
QA	Quality Assurance
QA/AC	Quality Assurance/Quality Control
RATA	Relative Accuracy Test Audits
SCC	Source Classification Codes
SIC	Standard Industrial Classification
SIP	State Implementation Plan
S/N	Serial Number
SO <sub>x</sub>	Sulfur Oxides
UST	Underground Storage Tank
UTM	Universal Transverse Mercator
VOC	Volatile Organic Compound

## II. SOURCE INFORMATION

### A. General

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On April 22, 2014, Calnev submitted an application for an Authority to Construct under the provisions of AQR 12.4. The emission increase is less than the minor NSR significance listed in AQR 12.4. According to AQR 12.4.3.2(b), this modification of the source is considered a minor revision of the Title V operating permit. The application requested the following changes:

- a. Addition of a diesel fired engine that serves the air compressor at the terminal;

**Table 1: New Emission Unit**

EU	Rating	Type	Manufacturer	Model No.	Serial No.
B11	48 HP	Air Compressor	John Deere	4045DF150F	PE4045D107913
		Engine – Diesel DOM: 2000			

- b. Revision to specific equipment descriptions and permit conditions of some storage tanks emission units;
- c. Emission units A41, A42, G01, and G02 have been removed onsite. Calnev is requesting that these emission units be deleted from the Title V permit.

The application was submitted to address the deficiencies observed during the Title V Full Compliance Evaluation performed by Air Quality in December 2013.

The propose changes to the permit conditions are listed below:

**Table III-A-1: List of Emission Units**

EU	Equipment ID Number	Rating	Description and Product Storage
A34	<del>Tank LV-TK-0005</del> <u>Tank 542D</u>	<del>355 bbl</del> <u>215 bbl</u>	Gasoline additive w/ fixed roof
A35	<del>Tank Amoco Storage</del> <u>Tank 542A</u>	143 bbl	Gasoline additive w/ fixed roof
A36	<del>Tank Shell Storage</del> <u>Tank 531A</u>	143 bbl	<del>Gasoline</del> <u>Lubricity</u> additive w/ fixed roof
A37	<del>Tank Diesel Dye</del> <u>Tank 542C</u>	12 bbl	Diesel dye w/ fixed roof
A38	<del>Tank 537B</del>	<del>262 bbl</del> <u>477 bbl</u>	<del>Outboard dye</del> <u>Gasoline</u> additive w/ fixed roof
A39	<del>Tank Add M-1</del> <u>Tank 531B</u>	119 bbl	Gasoline additive w/ fixed roof
A41	<del>Diesel Dye</del>	<del>119 bbl</del>	<del>Gasoline additive w/ fixed roof</del>
A42	<del>Tank add Tank B</del>	<del>119 bbl</del>	<del>Gasoline additive w/ fixed roof</del>
A45	<del>Tank 548</del>	<del>10,100 bbl</del> <u>12,890 bbl</u>	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/ domed external floating roof w/ primary and secondary seal
A48	<del>Tank 551</del>	<del>20,000 bbl</del> <u>10,100 bbl</u>	Gasoline, diesel/biodiesel, denatured ethanol, transmix, aviation gasoline and Jet Fuel w/ internal floating roof w/ primary and secondary seal
A49	<del>Tank LV-TK-0006</del> <u>Tank 542B</u>	<del>24 bbl</del> <u>4 bbl</u>	<del>Gasoline</del> <u>Red dye</u> additive w/ fixed roof
A53	<del>Tank EXX-2</del> <u>Tank 548B</u>	238 bbl	Gasoline additive w/ fixed roof
A54	<del>Tank Tex-1</del> <u>Tank 548A</u>	238 bbl	Gasoline additive w/ fixed roof
A55	<del>Tank 476</del>	<del>238 bbl</del> <u>357 bbl</u>	Waste water w/ fixed roof
G01	<del>Tank Refueling</del>	<del>250 gal</del>	<del>Diesel/biodiesel fuel Fixed roof AST for</del>
G02	<del>Tanks Refueling</del>	<del>250 gal</del>	<del>Gasoline fuel Fixed roof AST for</del>
H10	<del>Tank 500B</del>	<del>11,000 gal</del> <u>10,000 gal</u>	Jet fuel additive storage tank, AST, vertical-w/fixed roof
H13	<del>Parts washer</del>	<del>1.1 gallon tub</del> <u>3.25 gal</u>	35"W x 24"L x 17"D R&D Fountain Industries Company Parts Washer

**Notes:**

- 1 Deletions are marked with a strikethrough, additions and changes are underlined.
- 2 EUs A41 and A42 have been removed onsite.
- 3 EUs G01 and G02 have been removed onsite.

**Table III-B-9: Tank Control Requirements**

EU	Facility ID	Control Requirements
A11	540	<del>Internal</del> <u>Domed</u> <del>External</del> Floating Roof with primary and secondary seals
A41	Diesel Dye	Fixed Roof
A42	Additive B	Fixed Roof
A47	550	<del>External</del> <u>Internal</u> Floating Roof with primary and secondary seals
B04	500	<del>External</del> <u>Internal</u> Floating Roof with primary and secondary seals
B05	521	<del>External</del> <u>Internal</u> Floating Roof with primary and secondary seals
G01	--	Fixed Roof
G02	--	Fixed Roof

**Notes:**

- 1 Deletions are marked with a strikethrough, additions and changes are underlined.
- 2 EUs A41 and A42 have been removed onsite.
- 3 EUs G01 and G02 have been removed onsite.

**Condition**

III.C.9	<p>The Permittee shall conduct visual inspections of the internal floating roof, the primary seal, and the secondary seal as required by 40 CFR 60.113b(a)(1)&amp;(2) for each applicable storage vessels (EUs: A11, A13, A16 <del>A11</del> through A18, A21, A27 <del>through A29</del>, <u>A28</u>, <u>A45 through A48</u>, <del>and A58</del> <u>A56</u> through A61, <u>B04</u>, and B05). Inspections shall be conducted according to the following frequency:</p> <ol style="list-style-type: none"> <li>a. Initial inspection shall be conducted prior to filling the vessel with a volatile organic liquid; and</li> <li>b. Subsequent <u>visual</u> inspections through manholes <u>and roof hatches</u> shall be conducted on or before 12 month form the previous inspection.</li> </ol>
III.C.10	<p>Upon finding that an internal floating roof is not resting on the surface of the liquid inside the storage vessel, or there is liquid accumulated on a roof, or a seal is detached, or there are holes or tears in a seal fabric, or there are other openings in a seal of an applicable storage vessel (EUs: A11, A13, A16 <del>A11</del> through A18, A21, A27 <del>through A29</del>, <u>A28</u>, <u>A45 through A48</u>, <del>and A58</del> <u>A56</u> through A61, <u>B04</u>, and B05), the Permittee shall repair the items within 45 days....</p>
III.C.11	<p>The Permittee shall visually inspect the internal floating roof, the primary seal, the secondary seal, gaskets, slotted membranes and sleeve seals as required by 40 CFR 60.113b(a)(4) for each applicable storage vessel (EUs: A11, A13, A16 <del>A11</del> through A18, A21, A27 <del>through A29</del>, <u>A28</u>, <u>A45 through A48</u>, <del>and A58</del> <u>A56</u> through A61, <u>B04</u>, and B05) each time the storage vessel is emptied and degassed, and at intervals no greater than 10 years.</p>
III.C.12	<p>The Permittee shall determine the gap areas and maximum gap widths for each applicable storage vessel with an external floating roof (EUs: A08, <del>A01</del> through A10, A12, <u>A23</u>, <u>A24</u>, <u>A45</u>, <u>A46</u>, <u>A47</u>, <u>B04</u>, and B05) as required by 40 CFR <del>R-e.113b(b)</del> <u>60.113(b)(1)</u>. Measures shall be between the primary seal and the wall of the storage vessel and between the secondary seal and the wall of the storage vessel....</p>

III.C.13	The Permittee shall make necessary repairs or empty the storage vessel with an applicable <del>storage vessel with an</del> external floating roof (EUs: A08, <u>A01 through A10, A12, A23, A24, A45, A46, A47, B04, and B05</u> ) within 45 days of identification in any inspection for seals not meeting the requirements as follows:.....
III.C.14	<del>The Permittee shall visually inspect annually the internal floating roof, the primary seal, and the secondary seal, prior to filling the storage vessel with petroleum products as require by 60.143b(a)(1) for each applicable storage vessel....</del>
III.E.2.f	records of visual inspections required by Section III-C of this permit on the storage tanks (EUs: A13, <del>A16</del> <u>A11 through A18, A21, A27 through A29, A28, A45 through A48, A58 A56</u> through A61, B04, and B05) as follows:...
III.E.2.g	records of measurements of seal gaps required by Section III-C of this permit on applicable storage tanks (EUs: A08, <u>A01 through A10, A12, A23, A24, A45, A46, A47, B04 and B05</u> ) as follows:....

**Notes:**

- 1 Deletions are marked with a strikethrough, additions and changes are underlined.
- 2 Condition III.C.14 is a duplicate of Condition III.C.9. Therefore, it should be removed

On September 18, 2014, source requested to change the rating for Tank 550 (EU A47) in Table III-A-1 from "12,890 bbl" to "20,000 bbl" and the VOC PTE in Table III-B-1 from "1.72" to "1.56". Air Quality accepted this request and made corresponding changes in the permit.

PTE and Emissions Increase Calculation

**Diesel Engine PTE (tons per year)**

EU	Description	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>x</sub>	VOC
B11	Air Compressor Diesel Engine	0.01	0.01	0.08	0.02	0.01	0.01

There is a decrease in emissions due to the removal of emission units. The overall increase is below the significant threshold of any pollutant. Additionally, the changes in permit conditions are insignificant changes due to the change in emission unit description and therefore, it a minor revision of the permit. The source total PTE is recalculated with this permitting action and it is noticed that the VOC PTE decreased from 185.49 to 182.87 tons per year. The decrease is partially due to the removal of emission units and partially due to a math error in the past.

The recalculated Source PTE is listed below.

PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP
7.42	0.04	2.60	2.87	0.17	182.71	10.42

