DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY
air quality desert conservation PROGRAM sustainability

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PART 70 OPERATING PERMIT TECHNICAL SUPPORT DOCUMENT
(STATEMENT of BASIS)

APPLICATION FOR:
Part 70 Operating Permit Minor Revision

SUBMITTED BY:
Calnev Pipe Line LLC

FOR:
Calnev Pipe Line LLC
Source: 00013

LOCATION:
5049 North Sloan Lane
Las Vegas, Nevada, 89115

SIC code 4226, "Special Warehousing and Storage, Not Elsewhere Classified"
NAICS code 493190, "Other Warehousing and Storage"

Application Received: May 13, 2025

TSD Date: September 24, 2025

EXECUTIVE SUMMARY

Calnev Pipe Line LLC is a bulk fuel storage and transfer operation located in Hydrographic Area 212, which is currently designated as an attainment area for all regulated air pollutants except ozone. Hydrographic Area 212 was designated a serious nonattainment area for ozone on January 21, 2025. Clark County has drafted or imposed new requirements to address this designation. The source is 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. Therefore, fugitive emissions are included with the applicability determination. The source is a major source for volatile organic compound (VOC) pollutants and a minor source for all other criteria pollutants and HAP. It is also a source of GHG pollutants. The source consists of petroleum storage tanks, vapor holding tank, loading lanes, diesel-powered air compressor, diesel-powered fire water engine, cooling tower, wastewater treatment system, and haul roads. The source falls under SIC Code 4226: Special Warehousing and Storage, Not Elsewhere Classified and NAICS Code 493190: Other Warehousing and Storage.

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 or loaded onto delivery trucks. As the trucks are filled, specialized additives are injected according to customer's specifications.

The following table summarizes the source's potential to emit (PTE) each regulated air pollutant from all emission units addressed by this Part 70 Operating Permit.

Table 1: Source-wide Potential to Emit

Pollutant	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAPs[1]	Pb	H_2S	GHG[2]
Tons/year	9.85	1.58	3.26	2.55	0.18	188.01	9.30	0	0	11,440.88
Major Source Thresholds (Categorical)	100	100	100	100	100	100	10/25[1]	-	-	100,000
Major Source Serious nonattainment	100	100	50	100	100	50	10/25[1]	-	-	-

[1] A major source is defined as 10 tons for any individual HAP or 25 tons for combination of all HAPs.
[2] Metric tons per year of carbon dioxide equivalent. GHG = greenhouse gas pollutants.

This Technical Support Document accompanies the proposed Part 70 Operating Permit for Calnev Pipe Line LLC.

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I. SOURCE DESCRIPTION

A. DESCRIPTION OF SOURCE

Kinder Morgan's subsidiary Calnev Pipe Line, LLC (Calnev) owns and operates a petroleum products distribution terminal facility at 5049 North Sloan Lane in Las Vegas, Nevada. Las Vegas Terminal operations include receiving petroleum fuel products via pipeline or truck and transferring gasoline, diesel, and biodiesel from storage tanks into trucks via loading racks.

B. PERMITTING HISTORY

On September 11, 2023, DES approved a request for the permittee to conduct a product recovery pilot test to continuously recover petroleum hydrocarbon liquid from a groundwater extraction well that is part of the soil vapor recovery system (EU: SR04). The project was deemed light non aqueous phase liquid (LNAPL) pilot test. The request was granted as a change that does not require a permit revision in accordance with AQR 12.5.2.12.

The initial test was expected to last for 30 days. However, on November 7, 2023, a second prior notification form was submitted requesting to expand the project to a second groundwater extraction well and extend the time frame for an additional six months, through March, 2024. On April 23, 2024, the permittee submitted a request to extend the project timeframe to October, 2024. A third request for an extension was submitted on February 17, 2025. This request was for an additional 12-month time period, through October, 2025. The latter request for an extension was denied based on DES policy of approving temporary projects for a maximum of 12 months. The permittee was encouraged to submit an application to revise the operating permit.

C. CURRENT PERMITTING ACTION

On May 13, 2025, the permittee submitted a minor revision application requesting to add the LNAPL test project to the operating permit as an insignificant activity.

The process consists of two pumps, twelve flanges, and two 500-gallon storage tanks. Product is recovered using a 2-inch pneumatic, programmable skimmer pump. Air is supplied to the recovery pump using an electric compressor. Recovered product is conveyed from the skimmer pump via 3/8-in product recovery hose to two double-walled transportable product tanks. Each product tank is equipped with a high level float switch used to monitor product levels and control pump operation. Once the tanks are full, the product is transferred to the Las Vegas Terminal's mainline sump as transmix for recycling and further processing.

The application requested to include the LNAPL system as an insignificant activity. It was determined that the two 500-gallon storage tanks can be classified as insignificant activities. However, since there is already an emission unit for miscellaneous pumps and flanges (EU: B06), the PTE from the pumps and flanges for the LNAPL system will be added to this existing emission unit.

The operating permit was revised to include conditions specific to Calnev that are contained in AQR 121: “Reasonably Available Control Technology Determinations for Specific Major Stationary Sources in the 2015 8-Hour Ozone NAAQS Moderate Nonattainment Area HA 212.”

Most of the requirements contained in in AQR 121 were already included in the operating permit. As a result, the revisions were limited to adding AQR authority references to these conditions.

The information contained within this document is limited to the equipment addressed in the minor revision application.

II. EMISSIONS INFORMATION

A. EMISSION UNIT LIST

Table III-A-1: Affected Emission Unit

EU	Description
B06[M]	Misc. Losses/Leaks from Valves, Flanges, Pumps and VCU

Note: 'M' superscript denotes a modified emission unit for this permitting action

Table III-A-2: Insignificant Activities

Equipment	Description
LNAPL Tanks (2)	500-gallon Storage Tanks

B. APPLICABILITY EMISSIONS

Permitting applicability is determined by calculating the emissions for all proposed emission units using 8,760 hours of operation (except for emergency generators or fire pumps, which use 500 hours), any inherent controls, any inherent throughput limitations, and the emission factors provided by the manufacturer, by source test results, by EPA AP-42, or by other approved methods. As a categorical source, fugitive emissions are required to be included with applicability calculations.

Table III-B-1: Source-wide Applicability Emissions (tons per year)

Pollutants	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAPs	GHG[1]
Source Applicability Emissions	**9.85**	**1.58**	**3.26**	**2.55**	**0.18**	**188.01**	**9.30**	**11,440.88**
Major Source Thresholds (Title V)	100	100	100	100	100	100	10/25[2]	-
Major Stationary Source Thresholds (PSD)	250	250	-	250	250	-	10/25[2]	-
Major Stationary Source Threshold (Serious Nonattainment)	-	-	50	-	-	50	-	-

[1] A major source is defined as 10 tons for any individual HAP or 25 tons for combination of all HAPs.
[2] Metric tons per year of carbon dioxide equivalent. GHG = greenhouse gas pollutants..

As Table III-B-1 shows, Applicability Emissions are above the major source threshold for VOC pollutants. The source will retain the classification as a major Part 70 stationary source for VOC and a minor source for all other regulated pollutants.

C. SOURCE PTE

The source PTE equals the applicability emissions since fugitives are included in both.

Table III-C-1: Source PTE (tons per year)

PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAP	GHG
9.85	1.58	3.26	2.55	0.18	188.01	9.30	11,440.88

Table III-C-2: Emissions Increase (tons per year)

Description	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAP	GHG
Current Permitting Action	9.85	1.58	3.26	2.55	0.18	188.01	9.30	11,440.88
Renewal OP Issued 02/24/2025	9.85	1.58	3.26	2.55	0.18	188.00	9.30	11,440.88
Net Emissions Increase	0	0	0	0	0	0.01	0	0
AQR 12.5.1(d) Minor NSR Significance Levels	7.5	5.0	20	50	20	20		N/A
AQR 12.2.2(uu) Significance Thresholds	15	10	40	100	40	40	10	N/A
RACT/BACT Analysis Required	No	No	No	No	No	No	No	No

As shown in Table III-C-2, the calculated net emissions increase (NEI) from the project, which is the difference between PTE of EU:06 before and after the change, is of 0.01 tons per year. As a result, the minor NSR significant levels have not been exceeded. Therefore, a RACT analysis is not required for the LNAPL pilot test.

Emissions Statement

Any stationary source that actually emits a total of 25 tons or more of NO_x and/or 25 tons or more of VOCs is required to submit an annual emissions statement for both pollutants. The statement must provide actual annual NO_x and VOC emissions from all activities, including emission units, insignificant activities, and exempt activities, and will be separate from the emissions inventory (i.e., calculated annual emissions) report permittees submit each year. This requirement shall be a permit condition for any source with the potential to emit at least 20 tons of NO_x and/or VOCs, since those sources are the most likely to trigger it.

D. OPERATIONAL LIMITS

There are no additional operating limitations associated with this permitting action. All operational limitations established with previous permitting actions remain enforceable.

E. CONTROL TECHNOLOGY

There are no additional control requirements associated with this permitting action. All control requirements established with previous permitting actions remain enforceable.

F. MONITORING

There are no additional monitoring requirements associated with this permitting action. All monitoring requirements established with previous permitting actions remain enforceable.

G. PERFORMANCE TESTING

There are no additional performance testing requirements associated with this permitting action. All performance testing requirements established with previous permitting actions remain enforceable.

III. REGULATORY REVIEW

There are no additional local or federal requirements associated with this permitting action. All regulations identified with previous permitting actions remain enforceable.

IV. INCREMENT ANALYSIS

An increment analysis is not required. The proposed action does not result in emissions of a pollutant that triggers a minor source baseline date for Hydrographic Area 212.

V. PUBLIC PARTICATION

Pursuant to AQR 12.5.2.17, public participation is not required for minor revisions.

VI. ATTACHMENTS

Table VII-1. PTE Calculations for Pumps and Flanges added to EU: B06

Fitting Type	Factor (lbs/unit-hr)	Number of Fittings	VOC Emission (lbs/yr)	HAP Emission (lbs/yr)	VOC Emission (ton/yr)	HAP Emission (ton/yr)
Valves (Gas Service)	2.87E-05	2,376	597.35	31.36	0.30	0.02
Valves (Light Liquid Service)	9.48E-05	1,523	1264.77	66.40	0.63	0.03
Valves (Heavy Liquid Service)	9.48E-05	1,598	1327.06	69.67	0.66	0.03
Fittings (Gas)	9.26E-05	6,455	5236.14	274.90	2.62	0.14
Fittings (Light Liquid)	1.76E-05	4,105	632.89	33.23	0.32	0.02
Fittings (Heavy Liquid)	1.76E-05	4,620	712.29	37.40	0.36	0.02
Pump Seals (Gas)	1.43E-04	56	70.15	3.68	0.04	0.00
Pump Seals (Light Liquid)	1.19E-03	30	312.73	16.42	0.16	0.01
Pump Seals (Heavy Liquid)	1.19E-03	27	281.46	14.78	0.14	0.01
Relief Devices (Light Liquid)	2.87E-04	44	110.62	5.81	0.06	0.00
Relief Devices (Heavy Liquid)	2.87E-04	24	60.34	3.17	0.03	0.00
Relief Devices (Gas)	2.87E-04	35	87.99	4.62	0.04	0.00
Other (Gas)	2.65E-04	434	1007.49	52.89	0.50	0.03
Other (Light Liquid)	2.87E-04	254	638.59	33.53	0.32	0.02
Other (Heavy Liquid)	2.87E-04	321	807.03	42.37	0.40	0.02
	Total	**21,902**	**13,146.91**	**690.21**	**6.57**	**0.35**