DES
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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: April 1, 2024

TSD Date: 06/12/2024

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, which was classified as a moderate nonattainment area on January 5, 2023. 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. The source is a major source for volatile organic compound (VOC) pollutants and a minor source for all other criteria pollutants and HAP. 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	8.40	1.42	3.26	2.55	0.18	188.00	9.30	0	0	11,440.88
Major Source Thresholds (Categorical)	100	100	100	100	100	100	10/25[1]	0	0	100,000

[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 (TSD) accompanies the proposed Part 70 Operating Permit for Calnev Pipe Line LLC.

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I. ACRONYMS

Table I-1: List of Acronyms

Acronym	Term
AQR	Clark County Air Quality Regulations
ATC	Authority to Construct
CFR	Code of Federal Regulations
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
DAQ	Division of Air Quality
DES	Clark County Department of Environment and Sustainability
DOM	date of manufacture
EF	emissions factor
EPA	U.S. Environmental Protection Agency
EU	emission unit
GHG	greenhouse gas
HA	Hydrographic Area
HAP	hazardous air pollutant
hp	horsepower
kW	kilowatts
MMBtu/hr	Million British Thermal Units per Hour
NAAQS	National Ambient Air Quality Standard
NAICS	North American Industry Classification System
NO_X	nitrogen oxide(s)
$PM_{2.5}$	particulate matter less than 2.5 microns in aerodynamic diameter
PM_{10}	particulate matter less than 10 microns in aerodynamic diameter
PTE	potential to emit
RACT	Reasonably Achievable Control Technology
SCC	Source Classification Code
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO_2	sulfur dioxide
SOP	standard operating procedure
TDS	Total Dissolved Solids
TPH	tons per hour
VOC	volatile organic compound

II. 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

The following represents permitting activities prior to this permitting action since the last renewal:

Table II-B-1: Permit History

Issued Date	Description
5/6/2024	Title V OP — Administrative Revision
1/29/2024	Title V OP — Minor Revision
1/29/2024	Title V OP — Administrative Revision
1/29/2024	Title V OP — Administrative Revision
1/29/2024	Title V OP — Renewal

C. CURRENT PERMITTING ACTION

Calnev submitted a minor permit revision to add a manway to the existing jet fuel additive storage tank — Tank 500 AIA (EU: 26). This modification will increase the source's PTE by an amount less than the minor NSR significance level as defined in AQR 12.4.2.1, as well as meets the criteria for a minor permit revision under AQR 12.5.2.14(a)(1). The additive tank is a cylindrical, vertical fixed roof storage tank with a 252-barrel capacity. The tank stores jet fuel anti-icing additive (AIA). The safety data sheet for the additive is included with the application.

III. EMISSIONS INFORMATION

A. EMISSION UNITS LIST

Table III-A-1 lists the emission unit covered by this Part 70 OP.

Table III-A-1: Affected Emission Unit(s)

EU	Source ID	Rating	Description	Product Stores	Optional Stored Products
A26	Tank 500AIA	252 bbl	Fixed Roof AST with Manway	Anti-Icing agent (Jet Fuel Additive)	

B. SOURCE-WIDE PTE

Calnev is a major source of VOCs and a minor source of PM_{10}, $PM_{2.5}$, NO_x, CO, SO_2, and HAP emissions. Table III-B-1 shows the source-wide PTE.

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

PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOCs	HAPs	GHGs[1]
8.40	1.42	3.26	2.55	0.18	188.00	9.30	11,440.88

[1]Metric tons per year.

C. EMISSIONS CALCULATIONS

1. Calculations for the proposed manway on EU: A26

Fugitive VOC emissions result from modifying the AIA tank with a manway. Emissions from the manway were calculated using emission factors from the EPA's "Protocol for Equipment Leak Emission Estimates" November 1995, U.S. Environmental Protection Agency (EPA) 4531, R-95-017, Table 2-3. The EF is 287E-4 lb/source-hr and assumes 8,760 hours of operation per year, which equals a potential to emit (PTE) of 2.51 lb/yr and 0.00126 tpy for the manway as proposed. The annual PTE for EU: A26 is 0.05 tpy.

Table III-C-1: Emissions Increase (tpy)

Pollutant	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOCs	HAPs	Pb	H_2S	GHGs[1]
Current PTE	8.40	1.42	3.26	2.55	0.18	188.00	9.30	0	0	11,440.88
Proposed PTE	8.40	1.42	3.26	2.55	0.18	188.001	9.30	0	0	11,440.88
Δ in emissions	0	0	0	0	0	0.00126	0	0	0	0

[1]Metric tons per year.

2. Significance Evaluation

The minor NSR significant level for VOC from AQR 12.5 was not exceed due to the increase in emissions for this action. Thus, a RACT analysis is not required.

D. OPERATIONAL LIMITS

This unit is permitted for operation without limits.

E. CONTROL TECHNOLOGY

Additional controls are not required for this action.

F. MONITORING

All monitoring requirements from the last permit remain in effect.

G. PERFORMANCE TESTING

Performance testing is not required due to this permitting this action.

IV. REGULATORY REVIEW

This action didn't trigger additional local, state, or federal regulations.

V. INCREMENT ANALYSIS

An increment analysis is not required, since the proposed action does not emit a pollutant that triggers a minor source baseline date (NO_x and SO_2) for Hydrographic Area 212 (the Las Vegas Valley).

VI. PUBLIC PARTICIPATION

Under AQR 12.5.2.17, the public participation requirement is not triggered for minor revisions.

VII. ENVIRONMENTAL JUSTICE

Calnev is located in northeast Las Vegas. The nearest residences are less than 0.6 miles from the source. A cursory analysis of the EPA's Environmental Justice Screening and Mapping Tool (EJScreen) and using 3-mile radius shows that this permitting action will not have an adverse or disparate effect on an underserved population when compared to the general population of Las Vegas. The proposed modification results in less than a ton of total emissions and should have negligible impacts on nearby residents. Therefore, an extensive assessment wasn't performed.