

Statement of Basis

**Permit to Construct No. P-2008.0130
Project ID 61549**

**Sinclair Transportation Company, Boise Products Terminal
Boise, Idaho**

Facility ID 001-00093

Final

July 30, 2015
Kelli Wetzel *KW*
Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
FACILITY INFORMATION	4
Description	4
Permitting History	4
Application Scope	4
Application Chronology	4
TECHNICAL ANALYSIS	5
Emissions Units and Control Equipment	5
Emissions Inventories.....	5
Ambient Air Quality Impact Analyses	5
REGULATORY ANALYSIS.....	5
Attainment Designation (40 CFR 81.313).....	5
Permit to Construct (IDAPA 58.01.01.201).....	5
Tier II Operating Permit (IDAPA 58.01.01.401)	5
Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70).....	5
PSD Classification (40 CFR 52.21).....	6
NSPS Applicability (40 CFR 60)	6
NESHAP Applicability (40 CFR 61)	6
MACT Applicability (40 CFR 63)	6
Permit Conditions Review.....	6
PUBLIC REVIEW.....	6
Public Comment Opportunity.....	6

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
ASTM	American Society for Testing and Materials
Btu	British thermal units
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalent emissions
DEQ	Department of Environmental Quality
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
PC	permit condition
PM	particulate matter
PM _{2.5}	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compounds
yd ³	cubic yards
µg/m ³	micrograms per cubic meter

FACILITY INFORMATION

Description

Sinclair Transportation Company, Boise Products Terminal is a bulk gasoline terminal that receives liquid petroleum products via pipeline or trucks. The liquid products are stored on site in storage tanks and are transferred from the storage tanks to mobile tank trucks through a loading rack. Loading arms on the loading rack dispense the liquid product into the mobile tank trucks. When gasoline, including denatured ethanol, is loaded into mobile tank trucks, the vapors are collected in a vapor collection system and are oxidized in a vapor combustion unit

Permitting History

The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

April 18, 2014	P-2008.0130, Facility name change to Sinclair Transportation Company, Permit status (A, but will become S upon issuance of this permit)
June 22, 2011	P-2008.0130, Facility name change to Tesoro Logistics Operations LLC, Permit status (S)
March 22, 2011	P-2008.0130, Incorporation of 40 CFR 63 Subpart BBBBBB, Permit status (S)
December 10, 2008	P-2008.0130, Allow for loading ethanol, or ethanol/gasoline blends at the loading rack, Permit status (S)
May 23, 2006	P-050055, Revision of permit conditions without emissions increase, Permit status (S)
August 18, 2003	P-030041, Revision to amend permit conditions without emission increase, Permit status (S)
May 29, 2003	P-020052, Terminal upgrade project, limit the potential emission rates of all regulated pollutants below major source thresholds and 40 CFR 60 Subpart XX triggered, Permit status (S)
March 26, 2003	T1-030007, Change name of responsible official, Permit status (Terminated on 1/23/06)
November 13, 2001	T1-030007, Name change from Amoco Oil to Tesoro West Coast Company, Permit status (S)
May 23, 2001	9507-111-1, Tier I issued to Amoco Oil Co., Permit status (S)
June 7, 1993	PTC No. 001-00093, Permit status (S)
February 15, 1991	PTC No. 0020-0093, Soil-vapor extraction project, Permit status (S)

Application Scope

This PTC is a revision of an existing PTC for a facility name change.

Application Chronology

July 10, 2015	DEQ received an application and an application fee.
July 30, 2015	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Emissions Unit Description	Control Device Description	Emissions Discharge Point ID No. and/or Description
Loading rack	Vapor combustion system	Vapor combustion system stack
Bulk gasoline terminal (refer to 40 CFR 63 Subpart BBBBBB for details)	Varies	Varies

Emissions Inventories

This permitting action is for a facility name change. Emissions inventories are not required.

Ambient Air Quality Impact Analyses

This permitting action is for a facility name change. Ambient air quality impact analyses are not required.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Ada County, which is designated as attainment or unclassifiable for PM_{2.5}, PM₁₀, SO₂, NO₂, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the modified emissions source. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

IDAPA 58.01.01.301Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for VOC and HAP or 10 tons per year for any one HAP or 25 tons per year for all HAPs combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply.

PSD Classification (40 CFR 52.21)

40 CFR 52.21Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr.

NSPS Applicability (40 CFR 60)

The facility is currently subject to 40 CFR 60 Subpart XX - Standards of Performance for Bulk Gasoline Terminals. The requirements were incorporated into the permit in 2003.

NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP requirements in 40 CFR 61.

MACT Applicability (40 CFR 63)

The facility is currently subject to 40 CFR 63 Subpart BBBB that was included in the PTC issued on December 12, 2008, and the applicability determination can be found in the statement of basis for the PTC.

Permit Conditions Review

This section describes only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action. Note that some minor editing may have been done on the existing permit conditions, but the substantive meaning of those conditions has not been changed.

Permit Condition 1.1

This permit condition has been revised to explain the scope of the current project.

Permit Condition 1.3

This permit condition has been revised to state that this draft PTC will replace the currently active PTC when issued.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04 or IDAPA 58.01.01.404.04.