



City of Albuquerque

Internal Office Memorandum



Tim Keller, Mayor

Danny Nevarez, Acting Director

To: Permit File

From: Regan Eyerman, Senior Environmental Health Scientist

Date: February 4, 2019

Subject: Honstein Oil & Distributing, LLC
Permit application and Certificate of Registration #3131; Facility Airs #NM/001/02259
Facility ID: FA0005668; Record ID: PR0009612

Location: Honstein Oil
4020 Broadway Blvd. SE
Albuquerque, NM 87105
UTM Zone 13, 349885E, 3876660N

Mail Address: Honstein Oil & Distributing, LLC
11 Paseo Real
Santa Fe, NM 87507

Proposal: Honstein Oil & Distributing, LLC (Honstein Oil) has submitted a construction air quality permit application to modify Construction Permit #3131, to the Air Quality Program (Program) of the City of Albuquerque Environmental Health Department. Honstein Oil is requesting to allow distribution of unleaded gasoline to their company vehicles, increase unleaded gasoline annual throughput from 250,000 gallons to 500,000 gallons, and relocate their Albuquerque Terminal permanently from 101 Anderson Ave. SE to 4020 Broadway SE. The facility includes a 10,000-gallon gasoline aboveground storage tank.

Applicability: **Source Registration, 20.11.40 NMAC**
20.11.40.6 -- Any source which emits more than 2000 lbs of any air contaminant per year must obtain a Registration Certificate from the Air Quality Program.

Construction Permits, 20.11.41 NMAC
20.11.41.2.C.(1) – Applicable as the facility has equipment which is subject to 20.11.64 NMAC.

Permit Fees, 20.11.2 NMAC
Permit application review fees:
20.11.2.19.A.(2) – Modification of existing permits for proposed sources with a proposed allowable emission rate equal to or greater than 5 tons per year and less than 25 tons per year: \$1,678.00.
20.11.2.18.D(3) – Review fee for 40 CFR 63 standards is \$1,119.00
Honstein Oil paid \$1,678 on September 20, 2018 and will be invoiced the \$1,119 federal review fee.
20.11.2.21.E.(2) -- Gasoline Service and Fleet Stations: \$353.00 or \$50.00 per ton, whichever is greater.

Note: CPI Adjusted fees are shown and went into effect January 1, 2019.

General Provisions, 20.11.1 NMAC

Emission Standards For Hazardous Air Pollutants For Stationary Sources, 20.11.64 NMAC

20.11.64.12 – **INCORPORATION OF FEDERAL STANDARDS CODIFIED AT 40 CFR PART 63:** Except as otherwise provided, the National Emissions Standards for Hazardous Air Pollutants for Source Categories including the General Provisions thereto, promulgated by the United States Environmental Protection Agency and codified at 40 CFR Part 63, as amended in the Federal Register through January 23, 2017, are hereby incorporated as Air Quality Control Board Regulations of the Albuquerque/Bernalillo County Air Quality Control Board.

- This facility is subject to the requirements of the Federal National Emissions Standard for Hazardous Air Pollutants (NESHAP) found in 40 CFR 63 Subpart BBBB – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Plants as well as the general requirements of 40 CFR 63 Subpart A – General Provisions. The permittee shall comply with the specific requirements of Subpart BBBB applicable to existing gasoline bulk plants.
- This facility is subject to the requirements of the Federal National Emissions Standard for Hazardous Air Pollutants (NESHAP) found in 40 CFR 63 Subpart CCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities as well as the general requirements of 40 CFR 63 Subpart A – General Provisions. The permittee shall comply with the specific requirements of Subpart CCCC applicable to new gasoline dispensing facilities.

Administration, Enforcement, Inspection, 20.11.90 NMAC

20.11.90.13 NMAC- The owner or operator of any stationary source of an air contaminant shall, upon notification by the Director, maintain records of the nature and amounts of emissions, to which an air quality control emission regulation applies, from the source and any other information as may be deemed necessary by the Director to determine whether the source is in compliance with applicable regulations.

20.11.90.13.E NMAC-The Director shall establish a periodic visual surveillance system to detect and investigate apparent violations of visible emission limitations and such complaints relating to apparent violations of the regulations as may occur.

20.11.90.14.A NMAC-Upon request of the Director, the person responsible for the emission of air contaminants for which limits are established by the 20.11 NMAC rules shall provide such facilities, utilities, and openings exclusive of instrument and sensing devices, as may be necessary for the proper determination of the nature, extent, quantity and degree of such air contaminants. Such facilities may be either temporary or permanent at the discretion of the person responsible for their provisions; and shall be suitable for determination consistent with emission limits established in these Parts.

Public Notice: Public notice for this permit application ran from October 17, 2018 through November 16, 2018. A request for a public information hearing (PIH) was received on November 13, 2018 by Nora Garcia, President of Mountain View Neighborhood Association.

Compliance: The following permit conditions apply:

1. You must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.
2. You must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time.

3. You must only load gasoline into storage tanks and cargo tanks at your facility by utilizing submerged filling. Submerged fill pipes must be no more than 6 inches from the bottom of the tank.
4. You must perform a monthly leak inspection of all equipment in gasoline service.
5. Facility bulk gasoline plant daily throughput would amount to 20,000 gallons or less of gasoline
6. Facility gasoline dispensing monthly throughput amounts to 10,000 gallons of gasoline or less per month.
7. Facility must maintain accurate records and monitoring of Unit #1 for monthly gasoline throughput.

Actions Taken:

- 9/20/2018 Application received by the Program
- 10/8/2018 Application ruled complete
- 11/13/2018 Request for PIH received by Nora Garcia
- 11/26/2018 Ninety-day extension request approved by Department Director
- 1/30/2019 Request for public hearing approved by the Program

Annual Fees: Annual fees have been estimated to be \$353.00 per year.

POLLUTANT	pounds per hour (lbs/hr)	tons per year(tpy)
Volatile Organic Compounds (VOCs)	83.7	5.29

**Table A
Tank Loading Emissions**

VOC emissions from tanker truck loading have been calculated utilizing the loading loss equation in AP-42, Section 5.2, Equation 1, $L = 12.46 \text{ SPM/T, lb}/10^3 \text{ gal}$. The saturation factor (S) is from Table 5.2-1 for submerged loading: dedicated normal service. This calculation is for loading the aboveground gasoline tank, annual throughput is 500,000 gallons. Submerged fill has an efficiency of 95%.

Unit #			Emission Rate Calculations	Total Emissions
1	S = 0.6 P = 5.1487 psi M = 67 lb/lb-mole T = 525.66 R	Saturation Factor Vapor Pressure MW of Vapors	$L = 12.46 \times 0.6 \times 5.1487 \text{ psia} \times 67 \text{ lb}/\text{lb-mole} \times 0.05/525.66 \text{ R}$	0.245 lb/10 ³ gal
			$60 \text{ gal}/\text{min} \times 60 \text{ min}/\text{hr} \times 0.245 \text{ lb}/10^3 \text{ gal}$	0.88 lb/hr
	Liquid Temperature	$500000 \text{ gal}/\text{yr} \times 0.245 \text{ lb}/10^3 \text{ gal} \times 1 \text{ ton}/2000 \text{ lbs}$	0.06 tpy	

**Table B
Tanker Truck Loading Emissions**

VOC emissions from tanker truck loading have been calculated utilizing the loading loss equation in AP-42, Section 5.2, Equation 1, $L = 12.46 \text{ SPM/T, lb/10}^3 \text{ gal}$. The saturation factor (S) is from Table 5.2-1 for splash loading: dedicated normal service. This calculation is for loading the tanker truck, annual throughput is 450,000 gallons.

Unit #			Emission Rate Calculations	Total Emissions
1	S = 1.45 P = 5.1487 psi M = 67 lb/lb-mole T = 525.66 R	Saturation Factor	$L = 12.46 \times 1.45 \times 5.1487 \text{ psia} \times 67 \text{ lb/lb-mole} / 525.66 \text{ R}$	11.9 lb/10 ³ gal
		Vapor Pressure MW of Vapors	$60 \text{ gal/min} \times 60 \text{ min/hr} \times 11.9 \text{ lb/10}^3 \text{ gal}$	42.8 lb/hr
		Liquid Temperature	$450000 \text{ gal/yr} \times 11.9 \text{ lb/10}^3 \text{ gal}$	2.67 tpy

**Table C
Gasoline Dispensing**

Actual VOC emissions for the entire facility have been calculated utilizing AP-42, Section 5.2, the permit application values for annual throughput of gasoline products and assuming no Stage II vapor recovery. This calculation is for vehicle fueling from the tank, annual throughput is 50,000 gallons.

Tank # and Product	Annual Throughput (gallons)	Emission Rate Calculations	Total Emissions
1	50000	$3600 \text{ gal/hr} \times 11.7 \text{ lbs/10}^3 \text{ gal}$	42.1 lbs/hr
		$50000 \text{ gal/yr} \times 11.7 \text{ lbs/10}^3 \text{ gal} \times 1 \text{ ton/2000 lbs}$	0.29 tpy

**Table D
Total Emissions**

	lb/hr	tpy
Working Loss (Tanks 4.09d)	0.31	1.37
Breathing Loss (Tanks 4.09d)	0.21	0.90
Tank Loading	0.88	0.06
Tanker Truck Loading	42.8	2.67
Gasoline Dispensing	42.1	0.29
Total	86.3	5.29

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