



May 22, 2023

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale St, Suite 600
San Francisco, CA 94105
Attn: Title V Reports

TV Tracking #: 719

1. RECEIVED IN ENFORCEMENT: 05/22/2023

Electronic submittal

Subject: SFPP, L. P.'s Brisbane Terminal, Plant ID #4021
Title V Semi-Annual Monitoring Report for the Period 11/01/22 through 04/30/23
950 Tunnel Ave, Brisbane, California 94005

Attn: Title V Reports:

SFPP, L.P. ("SFPP") submits the enclosed Semi-Annual Monitoring Report in accordance with Section I, and F. of the Final Major Facility Review Permit issued to Facility #A4021, SFPP Brisbane Terminal. The Semi-Annual Monitoring Report covers the period from November 1, 2022 through April 30, 2023.

If you have any questions, please call me at (713) 420-6076 or Ling_Li@kindermorgan.com.

Sincerely,

A handwritten signature in blue ink, appearing to be 'Ling Li', is written over a white background.

Ling Li
Senior EHS Specialist
for SFPP, L.P.

Enclosure

Bay Area Air Quality Management District

375 Beale St, Suite 600, San Francisco, CA. 94105

Telephone: (415) 771-6000

**Report of Required Monitoring
TITLE V Operating Permit**

Facility Name: SFPP, L.P. Brisbane Terminal

Address: 950 Tunnel Avenue, Brisbane, California 94005

Title V Permit Number: A4021

Reporting Period: November 1, 2022 through April 30, 2023

I hereby certify that I am a Responsible Official for the above named facility as defined in 40 Code of Federal Regulations, Part 70.2. I further certify that, based on information and belief formed after reasonable inquiry, the statements and information in this certification are true, accurate, and complete.

Daniel Wittenberg

Signature of Responsible Official

5/22/2023

Date

Dan Wittenberg

Name of Responsible Official (please print)

Director of Operations

Title of Responsible Official (please print)

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII - A
 Applicable Limits and Compliance Monitoring Requirements
 S21, S22, S23, S24, S25 – LOADING RACKS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-33-301.1	N		9.6 g/1000 liters (0.08 lb/1000 gallons)	CARB Certification	P/ 9-15 months	Source test, Recordkeeping	Continuous	
POC	BAAQMD 8-33-301.2	N	01/10/2011	0.04 lb/1000 gallons	BAAQMD 8-33-309-4; 8-33-309.13; CARB Certification	C: P/9-15 months	Parametric; Source test; Recordkeeping; Notification	Continuous	
	BAAQMD 8-33-308	N	01/10/2011	< 3,000 ppm as methane or 6% of the LEL	BAAQMD 8-33-308.2; BAAQMD Condition #4275, part 1e, and part 15	C; P/weekly	Infrared HC Analyzer; Recordkeeping	Continuous	
POC	BAAQMD 8-33-309.2	N	01/10/2011	18 in. of water column	BAAQMD 8-33-309.11, and BAAQMD Condition #4275, part 1b	P/during product loading	Pressure gauge; Recordkeeping	Continuous	
POC	SIP 8-33-301.	Y		9.6 g/1000 liters (0.08 lb/1000 gallons)	CARB Certification	P/ E; throughput limit revision	Source test, Recordkeeping	Continuous	
	SIP 8-33-308	Y		3,000 ppm as methane and 6.8 kg (15 pounds) per day	BAAQMD Condition #4275, part 1e, and part 2	C	Infrared HC Analyzer	Continuous	
	SIP 8-33-309	Y		46 cm (18 in.) of water column	BAAQMD 8-33-309, and BAAQMD Condition #4275, part 1b	P/during product loading	Pressure gauge	Continuous	
	40 CFR 60.502(b)	Y		35 g/1000 liters	40 CFR 60.503(c)	None	N	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

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 S21, S22, S23, S24, S25 – LOADING RACKS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	40 CFR 60.502(e)	Y		Vapor-tight gasoline tank trucks	40 CFR 60.505(b)	P/during product loading, and within 2 weeks	Vapor tightness documents	Continuous	
POC	40 CFR 60.502(j)	Y		Liquid or vapor leaks	40 CFR 60.502(j) and 60.505(c)	P/M	Inspection; Records	Continuous	
POC	40 CFR 60.505(e)(ii)	Y		Vapor-tight gasoline tank trucks electronic recordkeeping	40 CFR 60.505(b)	P/during product loading, and within 2 weeks	Vapor tightness documents	Continuous	
	40 CFR 63.11088(a)	Y	1/10/2011	80 mg/liters	40 CFR 63.11092(a)	P/6 months	Source test	Continuous	
	40 CFR 63.11088(a)	Y	1/10/2011	Vapor-tight gasoline tank trucks	40 CFR 63.11092(f)(1)	P/annual	Certification test documents	Continuous	
	BAAQMD Condition #4275, part 5	Y		120 ppm as propane	BAAQMD Condition #4275, part 1c	C	Infrared HC Analyzer	Continuous	
Temperature	BAAQMD Condition #4275, part 11	Y		Operating temperature 500 degrees Fahrenheit	BAAQMD Condition #4275, part 15	C	BAAQMD Condition #4275, part 11	Continuous	
Total material through-put limit	BAAQMD Condition #4275, part 6	Y		250,000 gal/hr 2,400,000 gal/day 876,000,000 gal/yr 100,000 gal/yr direct mode	BAAQMD Condition #4275, part 9	P/D	Recordkeeping	Continuous	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD Condition #4275, part 11	Y		Operating temperature 500 degree Fahrenheit	BAAQMD Condition #4275, part 15	C	Record Keeping	Continuous	
POC	BAAQMD 8-18-305	Y		All equipment associated with delivery and loading operations shall be maintained to be leak free, vapor tight and in good working order.			Inspection	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII - B
 Applicable Limits and Compliance Monitoring Requirements
 S1, S2, S4, S5, S6, S7, S8, S9, S10, S11, S12, S13, S15, S16, S18, S20 - INTERNAL FLOATING ROOF TANKS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-5-303.1	N		PVV set within 10% of max pressure or 25.8 mmHg (0.5 psia)	BAAQMD 8-5-403 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-320.3.1	N		Gasket cover ≤ 0.32 cm (1/8 in) gap	BAAQMD 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-320.3.2	N		Inaccessible opening no visible gap	BAAQMD 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Intermittent	A small amount of product due to a small crack on the roof tank BT-11 (S-11) was discovered during inspection on 01/30/2023. The crack was repaired immediately. See the attached deviation report
POC	BAAQMD 8-5-320.4.2	N		Solid sampling or gauging wells in closed position with cover, seal or lid ≤ 0.32 cm (1/8 in)	BAAQMD 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII - B
 Applicable Limits and Compliance Monitoring Requirements
 S1, S2, S4, S5, S6, S7, S8, S9, S10, S11, S12, S13, S15, S16, S18, S20 - INTERNAL FLOATING ROOF TANKS**

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POC	BAAQMD 8-5-320.4.3	N		Solid sampling or gauging wells: Gap between well and roof shall be added to gaps measured ≤ 1.3 cm (1/2 in)	BAAQMD 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-320.5.2	N		Slotted sampling or gauging wells in closed position with cover, seal or lid ≤ 1.3 cm (1/2 in)	BAAQMD 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-320.5.3	N		Slotted sampling or gauging wells: Gap between well and roof shall be added to gaps measured ≤ 1.3 cm (1/2 in)	BAAQMD 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-320.6	N		Emergency roof drain with slotted membrane fabric cover $\geq 90\%$ opening area	BAAQMD 8-5-402 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-321.1	N		No holes, tears or other openings in the primary seal fabric	BAAQMD 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-5-321.2	N		Primary seal metallic shoe or liquid mounted type	BAAQMD 8-5-402.1 8-5-404	P/10 yr P/10 yr	Inspection Certification	Continuous	
POC	BAAQMD 8-5-321.3	N		Primary seal metallic shoe extends minimum 61 cm (24 in) for external floating and 46 cm (18 in) for internal floating roof tank above liquid surface	BAAQMD 8-5-401, 8-5-404	P/10 yr P/10 yr	Inspection Certification	Continuous	
POC	BAAQMD 8-5-321.3.1	N		Gap between shoe and tank shell is no greater than 46 cm (18 in)	BAAQMD 8-5-401, 8-5-404	P/10 yr P/10 yr	Inspection Certification	Continuous	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-5-321.3.2	N		For welded tanks, gap between tank shell and the primary seal < 3.8 cm (1 1/2 in). No continuous gap > 0.32 cm ((1/8 in) shall exceed 10% of circumference. The cumulative length of all seal gaps exceeding 1.3 cm (1/2 in) < 10% of circumference and the cumulative length of all seal gaps exceeding 0.32 cm (1/8 in) < 40% of circumference	BAAQMD 8-5-401, 8-5- 404	P/10 yr P/10 yr	Inspection Certification	Continuous	
POC	BAAQMD 8-5-322.1	N		No holes, tears, or other openings	BAAQMD 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	BAAQMD 8-5-322.2	N		Secondary seal shall allow insertion up to 3.8 cm (1 ½ in) in width	BAAQMD 8-5-402, & 8-5-404	P/10 yr P/10 yr	Inspection Certification	Continuous	

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 S1, S2, S4, S5, S6, S7, S8, S9, S10, S11, S12, S13, S15, S16, S18, S20 - INTERNAL FLOATING ROOF TANKS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-5-322.3	N		Gap between tank shell and the secondary seal shall not exceed 1.3 cm (1/2 in)	BAAQMD 8-5-402, & 8-5-404	P/10 yr P/10 yr	Inspection Certification	Continuous	
POC	BAAQMD 8-5-328.1.1	N		Tank $\geq 75 \text{ m}^3$, Tank cleaning 90% control, POC concentration < 10,000 ppm	BAAQMD 8-5-502	P/A	Source Test	Continuous	
POC	SIP 8-5-303.1	Y		PVV set within 10% of max pressure or 25.8 mmHg (0.5 psia)	SIP 8-5-403 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-320.3.1	Y		Gasket cover $\leq 0.32 \text{ cm}$ (1/8 in) gap	SIP 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-320.3.2	Y		Inaccessible opening no visible gap	SIP 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-320.4.2	Y		Solid sampling or gauging wells in closed position with cover, seal or lid $\leq 0.32 \text{ cm}$ (1/8 in)	SIP 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-5-320.4.3	Y		Solid sampling or gauging wells: Gap between well and roof shall be added to gaps measured \leq 1.3 cm (1/2 in)	SIP 8-5-402.3 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-320.5.2	Y		Slotted sampling or gauging wells in closed position with cover, seal or lid \leq 1.3 cm (1/2 in)	SIP 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-320.5.3	Y		Slotted sampling or gauging wells: Gap between well and roof shall be added to gaps measured \leq 1.3 cm (1/2 in)	SIP 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-320.6	Y		Emergency roof drain with slotted membrane fabric cover \geq 90% opening area	SIP 8-5-402 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-321.1	Y		No holes, tears or other openings in the primary seal fabric	SIP 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	

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 S1, S2, S4, S5, S6, S7, S8, S9, S10, S11, S12, S13, S15, S16, S18, S20 - INTERNAL FLOATING ROOF TANKS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-5-321.2	Y		Primary seal metallic shoe or liquid mounted type	SIP 8-5-402.1 8-5-404	P/10 yr	Inspection Certification	Continuous	
POC	SIP 8-5-321.3	Y		Primary seal metallic shoe extends minimum 61 cm (24 in) for external floating and 18 in for internal Floating Roof tank above liquid surface	SIP 8-5-402, 8-5-404	P/10 yr	Inspection Certification	Continuous	
POC	SIP 8-5-321.3.1	Y		Gap between shoe and tank shell is no greater than 46 cm (18 in)	SIP 8-5-401, 8-5-404	P/10 yr	Inspection Certification	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

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Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-5-321.3.2	Y		For welded tanks, gap between tank shell and the primary seal < 3.8 cm (1 1/2 in). No continuous gap > 0.32 cm ((1/8 in) shall exceed 10% of circumference. The cumulative length of all seal gaps exceeding 1.3 cm (1/2 in) < 10% of circumference and the cumulative length of all seal gaps exceeding 0.32 cm (1/8 in) < 40% of circumference	SIP 8-5-401, 8-5- 404	P/10 yr	Inspection Certification	Continuous	
POC	SIP 8-5-322.1	Y		No holes, tears, or other openings	SIP 8-5-402.2 & 8-5-404	P/twice per year at 4 to 8 months interval	Inspection Certification	Continuous	
POC	SIP 8-5-322.2	Y		Secondary seal shall allow insertion up to 3.8 cm (1 ½ in) in width	SIP 8-5-402, & 8-5-404	P/10 yr	Inspection Certification	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII - B
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 S1, S2, S4, S5, S6, S7, S8, S9, S10, S11, S12, S13, S15, S16, S18, S20 - INTERNAL FLOATING ROOF TANKS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-5-322.3	Y		Gap between tank shell and the secondary seal shall not exceed 1.3 cm (1/2 in)	SIP 8-5-402, & 8-5-404	P/10 yr	Inspection Certification	Continuous	
POC	SIP 8-5-328.1.1	Y		Tank $\geq 75 \text{ m}^3$, tank cleaning shall have liquid balancing with $\leq 0.5 \text{ psia}$	None	N	None	Continuous	
POC	SIP 8-5-328.1.2	Y		Tank $\geq 75 \text{ m}^3$, Tank cleaning 90% control, POC concentration $< 10,000 \text{ ppm}$	SIP 8-5-502	P/A	Source Test	Continuous	
Certification	BAAQMD 8-5-404			Submit report within 60 days of inspection or source test	BAAQMD 8-5-404		Submittal	Continuous	
POC	BAAQMD Condition #17285, part 1	Y		52.56 MM gal/yr	BAAQMD Condition #17285, part 2	P/D	Recordkeeping	Continuous	
	BAAQMD Regulation 8, Rule 5 (amended on 10/18/06)	Y						Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII - C
 Applicable Limits and Compliance Monitoring Requirements
 S29, S30, S31, S32 – UNDERGROUND TANKS/SUMPS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	40 CFR 63.11087 (a)	Y	1/10/2011		40 CFR 63.11092(e)(1)	P/E 1 or 5 or 10 yrs	Visual Inspection, Recordkeeping	Continuous	
	BAAQMD Condition #16325, part 1	Y		214,150 gal gasoline/yr 92,350 gal jet kerosene/yr	BAAQMD Condition #16325, part 2	P/D	Record keeping	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII - D
 Applicable Limits and Compliance Monitoring Requirements
 S28 – OIL/WATER SEPARATOR**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-8-301.1	N		Roof seals, other openings Gap <0.125 inch	BAAQMD 8-8-301.1	P/Initially and 6 months	Visual inspection	Continuous	
POC	SIP BAAQMD 8-8-301.1	Y		Roof seals, other openings Gap <0.125 inch	SIP BAAQMD 8-8-301.1	P/Initially and 6 months	Visual inspection	Continuous	
POC	BAAQMD Condition #11349, part 2	Y		Change-out with unspent carbon upon the detection of 10 ppm and 10% of inlet concentration	BAAQMD Condition #11349, part 5	P/Weekly	Portable hydrocarbon detector, recordkeeping	Continuous	
POC	BAAQMD Condition #11349, part 3	Y		6 ppm	BAAQMD Condition #11349, part 5	P/Weekly	Portable hydrocarbon detector, recordkeeping	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII – E
 Applicable Limits and Compliance Monitoring Requirements
 S35 – ETHANOL UNLOADING RACK**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-6-304	Y		21 gm/m ³ (0.17 lb/1000 gallons)		N	N	Continuous	
Ethanol throughput limit	BAAQMD Condition #23531, part 1	Y		52.56 MM gallon/yr	BAAQMD Condition #23531, part 3	P/M	Recordkeeping	Continuous	

**Table VII – F
 Applicable Limits and Compliance Monitoring Requirements
 S36 – OFF-SPECIFICATION FUEL UNLOADING RACK**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-2-301	N		Not more than 15 lb/day & 300 ppm		N	N	Continuous	
POC	SIP BAAQMD 8-2-301	Y		Not more than 15 lb/day & 300 ppm		N	N	Continuous	
Unloading event limit	BAAQMD Condition #23549, part 1	Y		10,950/yr	BAAQMD Condition #23549, part 3	P/M	Recordkeeping	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII – G
 Applicable Limits and Compliance Monitoring Requirements
 FUGITIVE COMPONENTS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-18-301	N		General equipment leak \leq 100 ppm	BAAQMD 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	BAAQMD 8-18-302	N		Valve leak \leq 100 ppm	BAAQMD 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	BAAQMD 8-18-303	N		Pump and compressor leak \leq 500 ppm	BAAQMD 8-18-401.2, 401.5, and 403	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	BAAQMD 8-18-304	N		Connection leak \leq 100 ppm	BAAQMD 8-18- 401.5, 401.6	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	BAAQMD 8-18-305	N		Pressure relief valve leak \leq 500 ppm	BAAQMD 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	BAAQMD 8-18-306.1	N		Essential equipment 8-18-503.1.2 leak must be <10,000 ppm and mass emissions must be determined within 30 days and APCO must be notified no less than 96 hours prior to mass emission measurements	BAAQMD 8-18-503.1.2	P/Q	Report	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII – G
 Applicable Limits and Compliance Monitoring Requirements
 FUGITIVE COMPONENTS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	BAAQMD 8-18-306.2	N		Awaiting repair Valves $\leq 0.15\%$ Pressure Relief $\leq 0.5\%$ Pump and Connector $\leq 0.5\%$	BAAQMD 8-18-503	P/24 hours	Inspection	Continuous	
POC	BAAQMD 8-18-306.3.2	N		Mass emissions & non-repairable equipment allowed Valve ≤ 0.1 lb/day & $\leq 1.0\%$ Pressure Relief ≤ 0.2 lb/day & $\leq 5\%$ Pump and Connector ≤ 0.2 lb/day & $\leq 5\%$	BAAQMD 8-18-401.3	P/D	Inspection	Continuous	
POC	BAAQMD 8-18-306.3.4	N		Essential equipment is repaired or replaced within five years or at the next scheduled turnaround, whichever date comes first	BAAQMD 8-18-401.10, and 502.4	N	Mass emission sampling, records	Continuous	
POC	SIP 8-18-301	Y		General equipment leak ≤ 100 ppm	SIP 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII – G
 Applicable Limits and Compliance Monitoring Requirements
 FUGITIVE COMPONENTS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-18-302	Y		Valve leak \leq 100 ppm	SIP 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	SIP 8-18-303	Y		Pump and compressor leak \leq 500 ppm	SIP 8-18-401.2, 401.5 and 403	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	SIP 8-18-304	Y		Connection leak \leq 100 ppm	SIP 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	SIP 8-18-305	Y		Pressure relief valve leak \leq 500 ppm	SIP 8-18-401.2 and 401.5	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	SIP 8-18-306.1	Y		Valve, pressure relief, pump or compressor must be repaired within 5 years or at the next scheduled turnaround	SIP 8-18-502.4	P/Q	Report	Continuous	
POC	SIP 8-18-306.2	Y		Awaiting repair Valves \leq 0.5% Pressure Relief \leq 1% Pump and Connector \leq 1%	SIP 8-18-502.4	P/Q	Inspection	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII – G
 Applicable Limits and Compliance Monitoring Requirements
 FUGITIVE COMPONENTS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
POC	SIP 8-18-306.3.2	Y		Mass emissions & non-repairable equipment allowed Valve \leq 0.1 lb/day & \leq 1.0% Pressure Relief \leq 0.2 lb/day & \leq 5% Pump and Connector \leq 0.2 lb/day & \leq 5%	SIP 8-18-502.4	P/D	Report	Continuous	
POC	SIP 8-18-306.3.3	Y		Total valve, pressure relief, pump or compressor leaks \geq 15 lb/day, they must be repaired within 7 days	SIP 8-18-502.4	P/D	Report	Continuous	
POC	SIP 8-25-302	Y		Pump leak \leq 500 ppm	SIP 8-25-401.2 & 8-25-403	P/Q P/D	Portable hydrocarbon detector, records	Continuous	
POC	SIP 8-25-303	Y		Compressor leak \leq 500 ppm	SIP 8-25-401.2 & 8-25-403	P/Q P/D	Portable hydrocarbon detector, records	Continuous	
POC	SIP 8-25-304.1	Y		Pump or compressor repaired within 5 years or next scheduled turnaround	SIP 8-25-401.1 & 8-25-402	P/Q	Portable hydrocarbon detector, records	Continuous	
POC	SIP 8-25-304.2	Y		Awaiting repaired valves < 1.0%	SIP 8-25-503.4	P/Q	Portable hydrocarbon detector, records	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII – G
 Applicable Limits and Compliance Monitoring Requirements
 FUGITIVE COMPONENTS**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
	SIP 8-25-305	Y		New or replaced pump and compressor leak ≤ 500 ppm for 4 consecutive quarters	SIP 8-25-401.2 & 8-25-403	P/Q P/D	Portable hydrocarbon detector, records	Continuous	
	SIP 8-25-306	Y		Repeat pump , compressor leak must meet SIP 8-25-304 & 8-25-305	SIP 8-25-401.2 & 8-25-403	P/Q P/D	Portable hydrocarbon detector, records	Continuous	
POC	40 CFR 63.11089	Y		Liquid or vapor leak	40 CFR 63.11089(a)	P/M	Inspection; recordkeeping	Continuous	

**Table VII - H
 Applicable Limits and Compliance Monitoring Requirements
 S33- EMERGENCY DIESEL GENERATOR**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
Opacity	BAAQMD 6-1-303.1	N		Ringelmann 2.0 for no more than 3 minutes in any hour	None	N		Continuous	
PM	BAAQMD 6-1-305	N		Visible Particles	None	N		Continuous	
FP	BAAQMD	N		0.15 gr/dscf	None	N		Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII - H
 Applicable Limits and Compliance Monitoring Requirements
 S33- EMERGENCY DIESEL GENERATOR**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
	6-1-310								
Opacity	SIP 6-303.1	Y		Ringelmann 2.0 for no more than 3 minutes in any hour	None	N		Continuous	
PM	SIP 6-305	Y		Visible Particles	None	N		Continuous	
FP	SIP 6-1-310	Y		0.15 gr/dscf		N		Continuous	
SO ₂	BAAQMD 9-1-301	Y		Property Line Ground Level Limits: < 0.5 ppm for 3 minutes and < 0.25 ppm for 60 min. and < 0.05 ppm for 24 hours	None	N	N/A	Continuous	
	BAAQMD 9-1-304	Y		0.05% wt sulfur in liquid fuel		P/E	Fuel certification recordkeeping	Continuous	
Hours of Operation	BAAQMD 9-8-330.1	N		Unlimited hours for emergencies	BAAQMD 9-8-530.2	P/monthly	Record Keeping	Continuous	
	BAAQMD 9-8-330.3	N		50 hours per year for reliability-related activities	BAAQMD 9-8-530	P/monthly	Record Keeping	Continuous	
	CCR, Title 17, Section 93115.6(b)(3)(A) (1)(a)	N		20 hours/yr for maintenance and testing	CCR, Title 17, Section 93115.10(d)(1) and 10(f)(1)(B)	C P/M	Non-resettable hour meter; records	Continuous	
	40CFR	Y		Unlimited hours for	40 CFR 63.6625(f)	C	Non-resettable	Continuous	

Title V Semi-Annual Monitoring Verification Report for Period November 1, 2022 through April 30, 2023

**Table VII - H
 Applicable Limits and Compliance Monitoring Requirements
 S33- EMERGENCY DIESEL GENERATOR**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance Status during Period: "Continuous"; "Intermittent"; or "Not in Compliance"	Additional Information
	63.6640(f)(1)			emergencies	and 63.6655(f)(2)		hour meter; records		
	40CFR 63.6640(f)(2)	Y		100 hours/yr maintenance checks, readiness testing; emergency demand response, and periods where there is a deviation of voltage or frequency of 5% or greater below standards	40 CFR 63.6625(f) and 63.6655(f)(2)	C	Non-resettable hour meter; records	Continuous	
	40CFR 63.6640(f)(3)			50 hours per year for non-emergency	40 CFR 63.6625(f) and 63.6655(f)(2)	C	Non-resettable hour meter; records	Continuous	
	BAAQMD Condition #22820, part1	N		20 hours/yr for maintenance and testing	BAAQMD Condition #22820, part 3 and 4	C P/M	Non-resettable hour meter; records	Continuous	
	BAAQMD Cond.# 22820, part2	Y		Unlimited hours for emergencies	BAAQMD Condition #22820, part 3 and 4	C P/M	Non-resettable hour meter; records	Continuous	

Appendix: Tank BT-11 Deviation Reports



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

COMPLIANCE & ENFORCEMENT DIVISION

Notification Form

Reportable
Compliance
Activity (RCA)

[See back of form for instructions](#) →

1. **BREAKDOWN RELIEF: *District Use Only* BREAKDOWN REFERENCE #:**

2. **MONITOR EXCESS EMISSION or EXCURSION: *District Use Only* REFERENCE #:**

3. **MONITOR IS INOPERATIVE: *District Use Only* REFERENCE #:**

4. **PRESSURE RELIEF DEVICE (PRD): *District Use Only* PRD REFERENCE #:**

SITE INFORMATION AND DESCRIPTION INFORMATION (REQUIRED)

Company	SFPP, LP Brisbane Terminal	Site #	4021
Address	950 Tunnel A venue, Brisbane, CA 94005	Source #	BT11
Reported by	Ling Li	Phone #	713-420-6076
Indicated Excess	N/A	Fax #	
Allowable Limit	N/A	Averaging Time	N/A
Start Time/Date	09:40 AM PST 01/30/2023	Clear Time	
Monitor/device type(s)	<input type="checkbox"/> ▶ CEM <input type="checkbox"/> ▶ GLM <input type="checkbox"/> ▶ Parametric <input type="checkbox"/> ▶ PRD <input type="checkbox"/> ▶ Non-monitor		
Monitor description(s)			
Parameter(s) exceeded or not functioning due to inoperation			
<input type="checkbox"/> ▶ NO _x	<input type="checkbox"/> ▶ SO ₂	<input type="checkbox"/> ▶ CO	<input type="checkbox"/> ▶ CO ₂
<input type="checkbox"/> ▶ O ₂	<input type="checkbox"/> ▶ H ₂ O	<input type="checkbox"/> ▶ Opacity	<input type="checkbox"/> ▶ Lead
<input type="checkbox"/> ▶ Hydrocarbon Breakthrough (VOC)	<input type="checkbox"/> ▶ Temperature	<input type="checkbox"/> ▶ Wind Speed	<input type="checkbox"/> ▶ H ₂ S
<input type="checkbox"/> ▶ Wind Direction	<input type="checkbox"/> ▶ Steam	<input type="checkbox"/> ▶ Other (describe)	<input type="checkbox"/> ▶ TRS
Unit(s) of Measurement			
<input type="checkbox"/> ▶ ppm	<input type="checkbox"/> ▶ ppb	<input type="checkbox"/> ▶ min/hr > 20%	<input type="checkbox"/> ▶ inches H ₂ O
<input type="checkbox"/> ▶ psig	<input type="checkbox"/> ▶ pH	<input type="checkbox"/> ▶ °Fahrenheit	<input type="checkbox"/> ▶ mmHg
<input type="checkbox"/> ▶ Flow			

Event Description:

At around 09:40 AM (Pacific Time) on 01/30/2023, a small puddle was found on the roof in IFR Tank BT11 during the quarterly tank inspection. It was estimated that the puddle is about 0.5 gallon of product. No LEL was detected. Investigation is on-going. Tank BT-11 is in ethanol service.

District Use Only

Received by

Date

Time

General Instructions

- ✓ Check the Box numbers 1- 4 that apply to the RCA you are trying to report or request and read the detailed instructions.
- ✓ You will receive an ID # for each RCA you submit. In the case of a request for Breakdown Relief where multiple monitors are affected, you do not need to submit multiple forms, as long as all necessary information is given on one form. RCA reported during other than core business hours will be assigned an ID # the following working day. If you do not receive an ID #, it is your responsibility to contact the BAAQMD to get one.
- ✓ You may submit only one request for breakdown relief per form. However, you may submit multiple indicated excess, inoperative monitors and PRD reports on one form, provided that the start and end times given for the events in the required information section is inclusive of all events. Information on parameters exceeded, units of measurement and allowable limits can be provided in the event description box or when contacted by District staff with questions.
- ✓ Fill out the "Site Information and Description Information Required" areas of this form and email to rca@baaqmd.gov
- ✓ **A 30-day written follow-up report is required for Breakdown Requests and PRD Releases.** Reports for these types of RCA must contain a quantification of emissions, the calculations used to derive the emissions, and their duration. Reference [Breakdown Admissions Advisory dated 12/3/04](#). Send 30-day report letters to: BAAQMD Compliance and Enforcement Division, MAILSTOP: RCA 30-DAY REPORT, 375 Beale Street, Ste. 600 San Francisco, CA 94105. NOTE: **You may have additional report requirements under Title V.**

Detailed Instructions

Box 1: To Request Breakdown Relief (Regulations 1-112, 1-113, 1-208, 1-431, 1-432)

If you have an equipment malfunction (e.g.; breakdown) that leads to the release of air pollutants above the regulatory or your permitted levels, you may request relief from BAAQMD enforcement action.

- Check Box #1.
- **NOTE: Start and end times given for these events in the required information section must be inclusive of all events.**
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Requests for breakdown relief may not be withdrawn and must be called in or faxed to the BAAQMD immediately upon discovery of an equipment malfunction.
- Receipt of an RCA ID# for a breakdown does not mean relief has been granted. An Inspector will visit your facility to determine compliance.

Box 2: Monitor Indicates Excess Emission or Excursion (Regulation 1-522.7, 1-523.3, 1-542)

When a BAAQMD-required monitor indicates an excess or excursion, you must report it to the BAAQMD.

- Check Box #2.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- Any excess emission indicated by a CEM or excursion of a parametric monitor, shall be reported to the BAAQMD within 96 hours.
- Area concentration excesses over the limits prescribed in District regulations shall be reported to the BAAQMD within the next normal working day following the examination of data.

Box 3: Monitor Is Inoperative (Regulations 1-522, 1-523, 1-530)

When a BAAQMD-required monitor is inoperative for greater than 24 hours, you must report it to the BAAQMD.

- Check Box #3 only if inoperative for greater than 24 hours.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All reports of inoperative monitors must be reported by the following BAAQMD working day and additionally be cleared by a notification of resumption of monitoring. To notify the BAAQMD regarding the resumption of monitoring, do not send in a separate RCA form; call (415) 749-4979 and give the RCA ID #, date, and the time of resumption.
- Inoperative monitors (except parametric monitors) with downtime greater than 15 days must furnish proof of expedited repair in a follow-up report.

Box 4: Pressure Relief Device (PRD) Is Released (Regulation 8-28-401)

When a PRD at your refinery/chemical plant vents to the atmosphere, you must report it to the BAAQMD.

- Check Box #4 only if a pressure relief device is released.
- Separate RCA ID #'s can be applied to monitor(s) affected by a PRD by also checking Box #2 if other monitors record an excess or excursion.
- Fill out all the information in the "Site Information and Description Information (Required)" area of the form.
- All PRD release reports must be reported by the following BAAQMD working day.



February 6, 2023

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale St, Suite 600
San Francisco, CA 94105

Electronic Submittal

Subject: 10-Day Notice of Non-compliance Report & 30-Day Follow-up Report for Tank BT-11 at SFPP, L.P. Brisbane Terminal (Facility #A4021) – 950 Tunnel Ave, Brisbane, California

Dear Director of Compliance and Enforcement:

In accordance with Condition I. F. of the Title V Operating Permit, SFPP, L.P. ("SFPP") is providing this 10-day non-compliance report to the Bay Area Air Quality Management District ("BAAQMD") for tank BT-11 at SFPP Brisbane Terminal. This letter also serves as a 30-day follow-up report.

At around 09:40 AM (Pacific Time) on 01/30/2023, a small puddle was found on the roof in IFR Tank BT11 during the quarterly tank inspection. It was confirmed product was coming through a 5" crack, which was repaired around 11:30 AM on 01/31/2023. The stain was cleaned up the tank is being emptied for further investigation and repair. The post-repair inspection report will be submitted once it is available. Tank BT-11 has been in ethanol service.

If you have any questions, please contact Ling Li at (713) 420-6076 or Ling_Li@kindermorgan.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ling Li', is positioned above the typed name.

Ling Li
Sr EHS Compliance Specialist
for SFPP, L.P.

cc: John Roca, Jorge Castillo, Carl Bortmas, Rachael Hoffstadt, Nina McAfee, SFPP, L.P.
EPA Region 9 (via email)



March 2, 2023

Director of Compliance and Enforcement
Bay Area Air Quality Management District
375 Beale St, Suite 600
San Francisco, CA 94105

Electronic Submittal

Subject: 60-Day Follow-up Report for Tank BT-11 at SFPP, L. P Brisbane Terminal Facility #A4021) – 950 Tunnel Ave, Brisbane, CA

Dear Director of Compliance and Enforcement:

In accordance with District Rule 8-5-119.3, SFPP, L.P. ("SFPP") is providing this report on the use of the repair exemption in Section 8-5-119 to the Bay Area Air Quality Management District ("BAAQMD") for the Tank BT-11 located at its Brisbane Terminal. BT-11 is an internal floating roof tank in ethanol service. This letter also serves as the non-compliance report per GD GACT (40 CFR 60.115b (3) and (4)) requirements.

Required Report information according to BAAQMD Rule 8-5-119.3:

3.1 Tank BT-11 (S-11), 09:40 AM (Pacific Time) on January 30, 2023 to 11:30 AM on January 31, 2023.

3.2 The small crack on the roof was repaired.

3.3 Section 8-5-305.5.

3.4 The tank was emptied and degassed on February 7, 2023. Further investigation is on-going. Any defective components will be repaired or replaced. The tank will be re-inspected before it returns to service.

The facility will continue with quarterly inspections to avoid similar issues.

In addition, this report also satisfies the requirement in District Rule 8-5-111-1.2.

If you have any questions, please contact Ling Li at (713) 420-6076 or Ling_Li@kindermorgan.com.

Sincerely,

Ling Li

A handwritten signature in blue ink, appearing to be "Ling Li", written over a light blue horizontal line.

cc: John Roca, Jorge Castillo, Carl Bortmas, Rachael Hoffstadt, Nina McAfee, SFPP, L.P.
EPA Region 9 (via email)