

KELLY W. HAYES
Senior Environmental Consultant
Midstream Operations

PHILLIPS 66
520 East D Street
Tacoma, WA 98421
Office: (253) 207-5569
Kelly.W.Hayes@p66.com



DK



January 27, 2020

UPS 1Z E53 32W 02 9282 0444

Mr. David Kauth
Northwest Region, Portland Office
Oregon Department of Environmental Quality
2020 SW Fourth Ave., Suite 400
Portland, Oregon 97201

**RE: 2019 Reporting Year
Annual Emissions Report
Portland Products Terminal
Permit 26-2026
Phillips 66**

Dear Mr. Kauth:

Phillips 66 (P66) owns and operates the Portland Products Terminal, a bulk storage and loading terminal, for finished gasoline and distillate products, located at 5528 NW Doane Ave., Portland, Oregon. Per the requirement of permit section 7.2, please find two copies of the emissions calculations.

Volatile organic compound (VOC) emissions during 2019 totaled approximately 62.3 tons. Emissions of hazardous air pollutants (HAPs) totaled 1.72 and 0.28 tons, combined and single, respectively. As shown in Table 1, the emissions did not exceed the PSELs values.

Total greenhouse gas (GHG) emissions for 2019 totaled 2,163 tons. This information is only required to enter into the EZ filer system if the emissions are equal to or above 2,500 tons.

The facility emissions were calculated using an in-house system called TankESPd+. This system utilizes AP-42 emission calculation methodologies, equations and emission factors.

The following documents are attached:

Table 1 – PSEL Limits and Emissions Summary
Table 2 – Annual Reporting
Detailed emissions and sample calculations

If you have any questions about this report or require any additional information, please call at (253) 207-5569.

Sincerely,

Kelly W Hayes

Table 1
PSEL Limits and Emissions Summary

Pollutant	PSEL Limit (tons/yr)	2019 Actuals (tons/yr)	Percent of PSEL
VOC	99	49.3	64.86
PM/PM ₁₀	14	0.035	0.26
SO _x	75	0.011	0.02
NO _x	39	1.83	5.04
CO	99	1.53	1.67
Single HAP	10	0.31	4.00
Total HAP	25	1.38	6.02



Phillips 66 Company Products Terminal

Report Year 2019

First day of current year: 1/1/2019

Site: Portland Terminal a, OR

Number of days in current year: 365

POINT NAME	ANNUAL PROCESS RATE	PROCESS RATE UNITS	EMISSION FACTOR	EMISSION FACTOR UNITS	POUNDS	TONS	Pollutant
BULK TERMINALS- LOADING							
Loading Rack	257,223	1000 gallons	0.0101	lbs/1000 gallons	2,597.0626	1.2985	VOC
Marine Loading	585	1000 gallons	0.7329	lbs/1000 gallons	428.6211	0.2143	VOC
Loading Not Captured (if controlled)	257,223	1000 gallons	0.1330	lbs/1000 gallons	34,206.4985	17.1032	VOC
Fugitive Components	257,808	1000 gallons	0.0041	lbs/1000 gallons	1,054.3162	0.5272	VOC
Miscellaneous Emissions	257,808	1000 gallons	0.0740	lbs/1000 gallons	19,080.7850	9.5404	VOC
Tank 36	0	1000 gallons	0.0000	lbs/1000 gallons	553.1815	0.2766	VOC
Tank 2561	0	1000 gallons	0.0000	lbs/1000 gallons	0.0000	0.0000	VOC
Tank 2669	0	1000 gallons	0.0000	lbs/1000 gallons	0.0000	0.0000	VOC
Tank 2783	0	1000 gallons	0.0000	lbs/1000 gallons	239.2030	0.1196	VOC
Tank 2784	803,560	1000 gallons	0.0003	lbs/1000 gallons	239.2030	0.1196	VOC
Tank 2915	123,511	1000 gallons	0.1083	lbs/1000 gallons	13,375.5663	6.6878	VOC
Tank 2916	9,015	1000 gallons	0.0552	lbs/1000 gallons	498.0518	0.2490	VOC
Tank 2982	0	1000 gallons	0.0000	lbs/1000 gallons	0.0000	0.0000	VOC
Tank 3407	210,761	1000 gallons	0.0607	lbs/1000 gallons	12,785.2657	6.3926	VOC
Tank 3408	38,544	1000 gallons	0.2706	lbs/1000 gallons	10,431.4783	5.2157	VOC
Tank 3409	18,156	1000 gallons	0.3077	lbs/1000 gallons	5,586.1075	2.7931	VOC
Tank 3410	26,535	1000 gallons	0.0279	lbs/1000 gallons	739.6892	0.3698	VOC
Tank 3411	3,093	1000 gallons	1.2985	lbs/1000 gallons	4,016.8092	2.0084	VOC
Tank 3412	26,374	1000 gallons	0.0243	lbs/1000 gallons	640.7261	0.3204	VOC
Tank 3413	308,607	1000 gallons	0.0099	lbs/1000 gallons	3,057.1256	1.5286	VOC
Tank 3579	117,185	1000 gallons	0.0235	lbs/1000 gallons	2,748.2302	1.3741	VOC
Tank 3623	52	1000 gallons	1.0985	lbs/1000 gallons	56.9412	0.0285	VOC
Tank 3761	64,870	1000 gallons	0.0275	lbs/1000 gallons	1,784.5986	0.8923	VOC
Tank 4252	0	1000 gallons	0.0000	lbs/1000 gallons	0.0000	0.0000	VOC
Tank 4253	0	1000 gallons	0.0000	lbs/1000 gallons	0.0000	0.0000	VOC
Tank 4254	0	1000 gallons	0.0000	lbs/1000 gallons	0.0000	0.0000	VOC
Tank 4255	4,532	1000 gallons	0.1800	lbs/1000 gallons	815.6410	0.4078	VOC
Tank 4259	22	1000 gallons	43.8581	lbs/1000 gallons	967.3292	0.4837	VOC
Tank 4260	0	1000 gallons	10.4101	lbs/1000 gallons	2.6234	0.0013	VOC
Tank 4318	10,055	1000 gallons	0.0655	lbs/1000 gallons	658.4745	0.3292	VOC
Tank 4441	17	1000 gallons	1.8011	lbs/1000 gallons	31.0239	0.0155	VOC

Phillips 66 Company Products Terminal

Site: Portland Terminal a, OR

Report Year 2019
 First day of current year: 1/1/2019
 Number of days in current year: 365

POINT NAME	ANNUAL PROCESS RATE	PROCESS RATE UNITS	EMISSION FACTOR	EMISSION FACTOR UNITS	POUNDS	TONS	Pollutant
Tank 4442	0	1000 gallons	0.0000	lbs/1000 gallons	0.0000	0.0000	VOC
Dock Red Dye Tank	0	1000 gallons	0.0000	lbs/1000 gallons	0.0000	0.0000	VOC
L4 Dodiflow Tote	0	1000 gallons	0.0259	lbs/1000 gallons	0.0065	0.0000	VOC
L4 Red Dye Tote	0	1000 gallons	0	lbs/1000 gallons	0.0000	0.0000	VOC
Rack Red Dye Tank	0.011	1000 gallons	3.5427	lbs/1000 gallons	0.0390	0.0000	VOC
Temporary BioDiesel Tank	0	1000 gallons	0.0000	lbs/1000 gallons	0.0000	0.0000	VOC
Cleaver-Brooks Natural Gas Boiler	36.5	MMscf	5.5000	lbs/MMscf	200.9150	0.1005	VOC
			100.0000	lbs/MMscf	3,653.0000	1.8265	NOx
			84.0000	lbs/MMscf	3,068.5200	1.5343	CO
			0.6001	lbs/MMscf	21.9223	0.0110	SOx
			1.9000	lbs/MMscf	69.4070	0.0347	PM
			120161.8431	lbs/MMscf	4,389,512.1273	2,194.7561	CO2
			2.2663	lbs/MMscf	82.7898	0.0414	CH4
			0.2266	lbs/MMscf	8.2790	0.0041	N2O
			120286.0389	lbs/MMscf	4,394,049.0013	2,197.0245	CO2e

Site Wide Emissions Totals, TPY	58.3978	VOC
	1.8265	NOx
	1.5343	CO
	0.0110	SOx
	0.0347	PM
	2,262.0803	CO2
	0.0441	CH4
	0.0047	N2O
	2,264.5797	CO2e

[illegible]

Phillips 66 Pipe Company - Portland Terminal

Report Year 2019

Fired Units				
Facility-Wide Combustion Emissions				
	Emissions (lbs)			
	NOx	CO	SO2	PM
<u>Combustion Units</u>				
Cleaver-Brooks	3,653.0000	3,068.5200	21.9223	69.4070
Erie	0.0000	0.0000	0.0000	0.0000
Generator	0.0000	0.0000	0.0000	0.0000
<u>Total Emissions</u>				
Annual, lbs	3,653.0000	3,068.5200	21.9223	69.4070
Annual, tons	1.8265	1.5343	0.0110	0.0347

Largest Single HAP Toluene	FACILITY-WIDE Single HAP EMISSIONS Unit: 9 tons Single HAP in any consecutive 12-month period											
	Jan 19 31	Feb 19 28	Mar 19 31	Apr 19 30	May 19 31	Jun 19 30	Jul 19 31	Aug 19 31	Sep 19 30	Oct 19 31	Nov 19 30	Dec 19 31
Storage Tanks												
36	0.19	0.27	0.43	0.56	0.78	0.97	1.26	1.20	0.89	0.54	0.25	0.17
2561	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2669	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2783	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
2784	1.59	0.14	0.24	0.31	0.44	0.54	0.70	0.66	0.54	0.30	0.14	0.10
2915	2.62	3.87	3.35	4.81	4.49	6.20	7.35	7.81	6.94	5.91	4.06	3.49
2916	0.11	0.47	0.27	0.77	0.50	1.31	2.70	2.11	1.52	0.76	0.72	0.46
2982	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3407	4.02	4.13	3.86	5.15	4.83	6.95	8.69	8.20	7.05	6.24	5.02	4.21
3408	2.30	2.36	2.66	3.40	3.50	4.55	5.58	5.55	4.99	3.94	2.86	2.41
3409	1.32	1.31	1.56	2.00	2.05	2.44	2.97	3.11	2.58	2.30	1.81	1.42
3410	0.07	0.07	0.03	0.09	0.04	0.12	0.12	0.13	0.11	0.10	0.09	0.09
3411	0.78	0.92	1.06	1.25	1.41	1.66	2.06	1.98	1.84	1.43	0.98	0.86
3412	6.07	6.07	6.08	6.08	6.09	6.10	6.11	6.12	6.10	6.09	6.08	6.08
3413	0.57	0.64	0.82	1.02	1.09	1.26	1.54	1.60	1.31	1.05	0.73	0.69
3579	1.93	3.16	2.26	5.42	5.55	8.90	9.44	9.72	5.90	5.35	3.77	3.09
3623	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3761	2.15	2.73	1.30	4.02	1.31	5.25	7.13	8.10	4.54	3.36	3.52	2.71
4252	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4253	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4254	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4255	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4259	0.61	0.64	0.82	0.92	1.18	1.42	1.72	1.72	1.38	1.04	0.74	0.63
4260	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
4318	1.08	0.50	0.62	0.91	1.34	1.89	2.43	2.20	1.58	1.47	0.78	0.66
4441	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Dock Red Dye Tank	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Rack Red Dye Tank	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Temporary BioDiesel Tank	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tank Cleaning Operations												
Place Holder												
Loading Racks												
Controlled	0.47	0.49	0.62	0.68	0.84	1.07	1.26	1.34	1.01	0.86	0.66	0.55
Uncontrolled	0.78	1.19	0.43	0.37	0.90	1.71	0.37	1.71	0.68	0.66	1.07	0.31
Fugitives												
Loading Not Captured (if controlled)	6.20	6.45	8.13	8.91	11.11	14.03	16.56	17.60	13.32	11.26	8.71	7.27
Equipment Leaks	6.27	5.66	6.27	6.07	6.27	6.07	6.27	6.27	6.07	6.27	6.07	6.27
Control Devices												
VCU pilot gas	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Combustion Units												
Cleaver-Brooks	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.02
Erie	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Generator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Place Holder	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Emissions												
Monthly	33.17	35.10	34.81	46.72	47.73	56.43	78.27	81.14	62.35	52.95	42.06	35.41
12-Month Rolling	33.17	68.28	103.09	149.81	197.55	263.98	342.25	423.39	485.74	538.69	580.75	616.17
12-Month Rolling (tons)	0.02	0.03	0.05	0.07	0.10	0.13	0.17	0.21	0.24	0.27	0.29	0.31
	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance	In Compliance

Not calculated in ESPplus

Combined HAP		FACILITY-WIDE Combined HAP EMISSIONS													
		Limit: 25 tons Combined HAP in any consecutive 12-month period													
		Combined HAP Emissions (lbs)												Calendar	
		Jan 19	Feb 19	Mar 19	Apr 19	May 19	Jun 19	Jul 19	Aug 19	Sep 19	Oct 19	Nov 19	Dec 19	YTD	
Storage Tanks															
36		0.8085	1.1307	1.8005	2.3401	3.2034	3.9600	5.0848	4.8284	3.6043	2.2400	1.0698	0.7333	30.8039	
2561		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
2669		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
2783		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
2784		5.5717	0.5151	0.8495	1.1364	1.6216	2.0457	2.6767	2.5451	2.0391	1.1018	0.4865	0.3394	20.9287	
2915		13.6372	18.1423	17.3183	22.9604	22.5586	29.3321	34.7084	36.3243	32.6282	27.5732	19.4843	16.7268	291.3940	
2916		0.4031	1.6846	0.9721	2.7942	1.8406	4.9597	10.3630	8.1095	5.7479	2.8100	2.5632	1.6225	43.8703	
2982		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
3407		18.2423	18.7506	18.7847	23.7789	23.3239	31.4657	38.8262	37.1125	32.4925	28.3068	22.5093	18.9644	312.5577	
3408		11.5630	11.8737	13.7139	16.7179	17.6267	21.9145	26.5916	26.4980	24.0126	19.2257	14.1639	11.9974	215.8888	
3409		6.4848	6.5253	7.7879	9.5637	10.0351	11.7569	14.1480	14.6479	12.5413	10.9332	8.5484	6.8460	119.8183	
3410		0.2134	0.2116	0.0955	0.2550	0.1336	0.3323	0.3559	0.3721	0.3157	0.2898	0.2511	0.3068		
3411		4.0978	4.6125	5.4201	6.2290	7.0032	8.1431	9.9298	9.6742	8.9666	7.1140	5.0392	4.1716	80.4009	
3412		0.2005	0.1941	0.2246	0.2303	0.2631	0.2931	0.3162	0.3289	0.2788	0.2622	0.2341	0.2312	3.0572	
3413		3.0431	3.3168	4.1776	4.9815	5.3838	6.1794	7.4596	7.6706	6.5228	5.2806	3.7709	3.4454	61.2321	
3579		6.8074	11.3005	8.1940	19.9561	20.8434	34.0423	36.6016	37.6824	22.4496	19.8000	13.5594	10.9006	242.1373	
3623		0.3749	0.2751	0.7148	0.9125	0.8800	1.5950	1.4833	1.9585	1.4698	0.9255	0.5015	0.1684	11.2591	
3761		7.5651	9.7185	4.6756	14.6684	4.8816	19.8668	27.3754	31.0648	17.1561	12.3719	12.6043	9.5434	171.4918	
4252		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
4253		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
4254		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
4255		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
4259		2.6140	2.7196	3.4531	3.8251	4.8502	5.7642	6.9143	6.9218	5.6078	4.3123	3.1453	2.6750	52.8027	
4260		0.0038	0.0057	0.0102	0.0130	0.0190	0.0249	0.0332	0.0315	0.0224	0.0127	0.0054	0.0035	0.1853	
4318		3.8132	1.8005	2.2514	3.3360	5.0191	7.2269	9.4232	8.5289	6.0316	5.4251	2.7853	2.3427	57.9937	
4441		0.2392	0.3511	0.5811	0.7796	1.1085	1.4133	1.8507	1.8699	1.4264	0.8779	0.4377	0.2158	11.1511	
4442		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0441	0.0441	
Dock Red Dye Tank		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
L4 Dodflow Tote		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0007	0.0007	
L4 Red Dye Tote		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0161	0.0161	
Rack Red Dye Tank		0.0022	0.0033	0.0054	0.0073	0.0104	0.0133	0.0174	0.0165	0.0120	0.0070	0.0031	0.0020	0.1000	
Temporary BioDiesel Tank		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Loading															
Controlled		2.4948	2.5676	3.2048	3.4764	4.2728	5.3111	6.2030	6.5864	5.0453	4.3566	3.4416	2.9200	49.8805	
Marine Loading		2.7385	4.2256	1.5455	1.3485	3.3260	6.4468	1.4269	6.5323	2.5631	2.4300	3.8426	1.0851	37.5108	
Loading Not Captured (if controlled)		32.8600	33.8190	42.2113	45.7885	56.2785	69.9535	81.7014	86.7509	66.4526	57.3822	45.3300	38.4593	656.9871	
Fugitives															
Equipment Leaks		20.7008	18.6975	20.7008	20.0331	20.7008	20.0331	20.7008	20.7008	20.0331	20.7008	20.0331	20.7008	243.7356	
Combustion Units															
Cleaver-Brooks		4.1400	3.0616	3.1000	2.8100	2.5900	2.2791	4.1196	4.1573	4.2325	6.8849	8.0512	9.7630	55.1891	
Erie		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Generator		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Total Emissions															
Monthly		148.6193	155.5026	161.7927	207.9418	217.7740	294.3522	348.3111	360.9133	281.6520	240.6242	191.8706	154.4065		
12-Month Rolling		371.6543	508.4594	649.5513	837.4600	1,034.5332	1,308.8523	1,636.4625	1,976.6750	2,238.2939	2,458.2173	2,630.0549	2,763.7605	2,763.7605	
12-Month Rolling (tons)		0.1858	0.2542	0.3248	0.4187	0.5173	0.6544	0.8182	0.9883	1.1191	1.2291	1.3150	1.3819	1.3819	

	Speciated VOC	FACILITY-WIDE Speciated VOC EMISSIONS																					
		Speciated VOC Emissions (ton)																					
		Acetaldehyde	Benzene	Formaldehyde	Heptanal	Hexane	Octanal	Nonanal	Decanal	Undecanal	Dodecanal	Tridecanal	Tetradecanal	Pentadecanal	Hexadecanal	Heptadecanal	Octadecanal	Nonyl alcohol	Decyl alcohol	Toluene	Xylene	Formaldehyde	Phenol
Microbial Tanks	36	0.0000	0.0002	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	2561	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	2069	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	2783	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	2784	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	2916	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	2919	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	2962	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	3407	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	3408	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	3409	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	3410	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	3411	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	3412	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	3413	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	3478	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	3479	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	3523	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	3781	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	4252	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
4293	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
4294	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
4295	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
4299	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
4401	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
4403	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
4442	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	
Dock Red Dye Tank	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
L4 Doffflow Tots	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
L4 Red Dye Tank	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Red Red Dye Tank	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Temporary BioHeat Tank	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Loading Controlled Marine Loading Loading Not Captured (Controlled)	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Facilities Equipment Leaks	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Miscellaneous Miscellaneous Emissions	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Combustion Units Crewer-Brooks EPA Generator	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total Emissions Annual, lbs Annual, tons	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Emission Unit ID No. Cleaver-Brooks				
	CO2	CH4	N2O	CO2e
Annual Emission, lbs	4,389,512.1273	82.7898	8.2790	4,394,049.0013
Annual Emission, TPY	2,194.7561	0.0414	0.0041	2,197.0245
Annual Emission, tonnes/yr	1,995.2328	0.0376	0.0038	1,997.2950

Emission Unit ID No. Erie				
	CO2	CH4	N2O	CO2e
Annual Emission, lbs	134,648.4371	5.4617	1.0923	135,110.4932
Annual Emission, TPY	67.3242	0.0027	0.0005	67.5552
Annual Emission, tonnes/yr	61.2038	0.0025	0.0005	61.4139

Emission Unit ID No. Generator				
	CO2	CH4	N2O	CO2e
Annual Emission, lbs	0.0000	0.0000	0.0000	0.0000
Annual Emission, TPY	0.0000	0.0000	0.0000	0.0000
Annual Emission, tonnes/yr	0.0000	0.0000	0.0000	0.0000

**Phillips 66 Company Products Terminal
Portland, OR**

RY2019

Emissions types:

MISCELLANEOUS EMISSIONS - Other emissions from ordinary facility operations

Miscellaneous Emissions

Component type	Number	Emission Factor (VOC-lbs/comp.-yr)	Emissions (lb VOC/yr)		
Separator Losses			17,088.8		
Aggregated Insignificant Emissions			1,992.0		
Gasoline Tank Roof landing			0.0		
Gasoline Tank Cleaning			0.0		
Place Holder					
Place Holder					
Misc Emissions, lb/yr			19,081	9.5	ton/yr
Misc Emissions, lb VOC/yr			19,081	9.5	ton/yr

Phillips 66
Portland Terminal, WA
Background on TankESPd+

ESPd+ is a software tool that applies EPA's AP-42 methodology to estimate emissions from various types of emission sources that are commonly found at petroleum terminal and pipeline facilities. The current version is used to estimate emissions for:

- Storage Tanks.
- Loading Racks.
- Control Devices.
- Combustion Units.
- Equipment Leaks.

All calculations for these source types are based on AP-42 except as noted in the sample calculations. For evaporative emissions, speciation of the contribution of individual chemicals to the total VOC emissions is determined by applying Raoult's Law at the given temperature to determine vapor-phase concentrations from the given concentrations of the chemicals of interest in the liquid phase. For equipment leak emissions, the liquid-phase concentration is used to determine the speciated emissions. For speciated products of combustion, AP-42 factors are applied.

Information on the presence and configuration of emissions sources is referred to as "source information," whereas routine information on operating parameters for these emissions sources is referred to as "service information." Thus there is a one-time entry of Source Information to describe each emissions source, and on-going entry of Service Information to describe the usage of these emissions sources during a given period of time.

Phillips 66
Portland Terminal, WA
Sample Calculations for Loading Operations

Loading Operations

page 1 of 2

General notes:

This sample calculation presents the method by which ESPd+ calculates emissions for the loading of a particular stock through a given loading rack. ESPd+ repeats this calculation for each type of stock loaded and for each loading rack. The Source Information identifies whether the loading operations are controlled and, if so, the type of cargo tank that is loaded and the applicable annual leak test. From this information, a capture efficiency is determined from factors published by EPA - or, in the case of marine loading, by TCEQ. The Service Information then gives the throughput for this stock through this loading rack during this time period, and the emissions are then calculated from AP-42 Section 5.2 Equation 1.

Emissions associated with the vapor load to the control device are shown with the control device calculations.

Uncontrolled scenario:

$$\text{Emissions (lbs)} = [12.46 * (S * P * M) / T] * [\text{throughput(gal)} / 1000]$$

[AP-42 Section 5.2 Equation 1](#)

where: **S** is the saturation factor (assumed equal to 1.0)
P is the true vapor pressure of the stock being loaded (psia)
M is the vapor molecular weight of the stock being loaded
T is the temperature of the compartment being loaded (degrees R)
(assumed equal to average ambient temperature)

Controlled scenario:

$$\text{Emissions not captured (lbs)} = (1-X) * [12.46 * (S * P * M) / T] * [\text{throughput(gal)} / 1000]$$

$$\text{Vapor load to control device (lbs)} = (X) * [12.46 * (S * P * M) / T] * [\text{throughput(gal)} / 1000]$$

where: **X** is the capture efficiency, determined by the type of cargo tank and the applicable annual leak test.

Source Information data:

Loading Rack/Berth ID: Portland Terminal a, OR

Loading configuration: controlled (vapors routed to a control device)

Type of cargo tank: tank truck

Annual leak test: XX / GACT (3-inch)

If controlled:

Primary control device: VRU

Secondary control device:

Service Data:

Loading Rack/Berth ID: Portland Terminal a, OR

Time period: Monthly

Time Period (mm/yyyy): 08/01/2019

Stock: Gasoline

Stock RVP: 7.8

Throughput (gallons): 655,211

If controlled:

Control device: primary

Select Primary or Secondary, depending upon which control device was used for this throughput.

For tank trucks and rail cars, the capture efficiency is from AP-42 5.2.2.1.1.

For marine vessels, the capture efficiency is from TCEQ guidance.

Phillips 66
Portland Terminal, WA
Sample Calculations for Loading Operations

Calculated parameter values:

page 2 of 2

	Annual	
X	98.7%	capture efficiency
S	1.0	assume saturation is 100%
P	4.66	from selected stock and temperature
M	66	from selected stock
T	68.6	assume equal to average ambient (deg F)

Estimated Emissions from the cargo tanks (lb):

$$= (1-X)[12.46*(S*P*M)/T][throughput(gal)/1000]$$

60.97

For a controlled scenario, these are the emissions that are not captured (e.g., tank truck leakage).

Vapor Load to Control Device (lb):

$$= (X)[12.46*(S*P*M)/T][throughput(gal)/1000]$$

4,629

For a controlled scenario, these are the captured emissions, routed to the control device.

Phillips 66
Portland Terminal, WA
Sample Calculations for Loading Operations

Equipment Leaks

Notes:

If the service is a fluid in the vapor phase, select the 'gas' service.

If the service is crude oil, select whether 'light' or 'heavy'.

If the service is any other fluid in the liquid phase, select 'light liquid'.

Source Information:

Time Period: Aug-2019

Component Type	Service	Subject to M21 LDAR?	Speciation Stock	N1 Component Count	Estimated Emissions (pounds)
Valves	gas	No	Gasoline	15	0.32
Valves	light liquid	No	Gasoline	1,017	71.73
Pumps	gas	No	Gasoline	0	
Pumps	light liquid	No	Gasoline	18	15.94
Fittings	gas	No	Gasoline	68	4.68
Fittings	light liquid	No	Gasoline	2,708	35.53
Others	gas	No	Gasoline	5	0.98
Others	light liquid	No	Gasoline	234	49.90

When not subject to Method 21 LDAR inspections, the equipment leak emissions are simply the component count multiplied by the applicable emission factor, and there is no associated entry of service data.

If not subject to M21 LDAR:

Emissions (lb/hr) = F1*N1

Emission factors:

Gas & Liquid Products

[EPA 453/R-95-017 Table 2-3](#)

Crude Oil

[API 4653 Table ES-2](#)

Component type	Service	F1
valves	gas	2.87E-05
valves	light liquid	9.48E-05
pump seals	gas	1.43E-04
pump seals	light liquid	1.19E-03
fittings (1)	gas	9.26E-05
fittings (1)	light liquid	1.76E-05
others (2)	gas	2.65E-04
others (2)	light liquid	2.87E-04

(1) connectors and flanges

(2) compressors and any components other than fittings, pumps, or valves

**Phillips 66
Portland Terminal, WA
Sample Calculations for Control Devices**

Control Devices

page 1 of 3

General notes:

The vapor load to the control device is summed from the emission sources that are routed to the given control device, and then the control device efficiency is applied. The load of Total VOCs and of the speciated VOC components (Benzene et al) are compiled separately from each of the contributing emissions sources. That is, a speciation calculation is not performed on the Total VOC vapor load to the control device, but rather the speciation calculations are done at each emissions source. This is because speciation is performed differently for different types of emissions sources. Separate emission factors are given for speciation of the products of combustion, as noted below.

Load Factor

The load factor (LF) is a variable multiplied by the total VOC load to the control device from emissions sources (Vapor Load) to calculate emissions. The load factor (LF) is dimensionless; it calculates the (lbs) of a pollutant as a decimal fraction of the Vapor Load.

Calculation of the Total VOC and speciated VOC components from the vapor load are calculated using:

$LF = (1 - X)$ for Total VOCs, where X is the control efficiency of the given control device.

$LF = (1 - X) * Zi$ for speciated VOC components, where Zi is the vapor phase fraction of speciated component (i) in the total load.

Emission factors are given in various sets of units, and thus the calculation of LF needs to convert emission factors to a basis of: (pounds of pollutant) per (pound of VOC load)

Flares and Vapor Combustion Units (Flares/Vcus)

In addition to emissions of Total VOCs and speciated VOC components that pass through the control device from the vapor load, flares and Vcus emit products of combustion. The vapor load must be characterized as one of the types of combustion fuel for which emission factors are available, and the emission factors for that type of combustion fuel are then applied. When there is vapor load from more than one type of combustion fuel (e.g. some gasoline throughput and some diesel throughput), the emissions associated with each are calculated separately. Separate combustion calculations are required for:

- combustion of vapor load (with a separate calculation for each type of combustion fuel)
- combustion at the pilot flame (assumed to be natural gas)
- combustion of auxiliary fuel (assumed to be natural gas)

Emission factors for products of combustion are from AP-42 for the pilot flame and the auxiliary fuel, and from TCEQ document RG-109 for the vapor load, except for greenhouse gases, for which the emission factors are from EPA's GHG MRR -- 40 CFR Part 98 Subpart C, Tables C-1 & C-2. High heat values (HHV) used to calculate LF are from EPA's GHG MRR Subpart C, Table C-1.

General equation:

Emissions (lbs) = (LF) * [total VOC load to control device from emissions sources]

+ (EF1*S1 + EF2*C2*S2 + EF3) * K * (U*H) for the pilot flame
+ (EF1*S1 + EF2*C2*S2 + EF3) * K * (U*H) for the auxiliary fuel (assist gas)

where:

total VOC load (vapor load) is summed from the emissions sources routed to the given control device, and is compiled in (pounds).

LF is the load factor for a given pollutant.

LF is determined as follows:

Pollutant	LF	variables for the 'vapor load' LF
CO2	= (EF3) * K * H	H = X * HHV / density
N2O	= (EF3) * K * H	H = X * HHV / density
CH4	= (EF3) * K * H	H = X * HHV / density
NOx	= (EF3) * K * H	H = X * HHV / density
CO	= (EF3) * K * H	H = X * HHV / density
Total VOCs:	VOC = (1-X)	X = control device efficiency
	PM = (EF3) * K * H	H = X * [HHV(fuel) / HHV(ng)] / density
	SOx = (EF1) * S	S is the sulfur content (%)
Speciated VOCs:	Benzene = (1-X) * Zi	X = control device efficiency
	Ethylbenzene = (1-X) * Zi	X = control device efficiency
	Toluene = (1-X) * Zi	X = control device efficiency
	Xylenes = (1-X) * Zi	X = control device efficiency
	n-Hexane = (1-X) * Zi	X = control device efficiency
	Naphthalene = (1-X) * Zi	X = control device efficiency
	Formaldehyde = (EF3) * K * H	H = X * [HHV(fuel) / HHV(ng)] / density
	X	is the control efficiency
	Zi	is the weight fraction of chemical "i" in the total VOC load, as determined from the emissions sources routed to the given control device.

For Vapor Recovery Units (VRUs):

EF1 EF2 EF3 are all set to 0 for VRUs (no products of combustion)

The emissions from a VRU are simply the vapor load factored by the control efficiency of the VRU.

For flares and enclosed vapor combustion units (Flares/Vcus):

page 2 of 3

- EF1** is an Emission Factor dependent on sulfur content in the gasoline/diesel
S1 is sulfur content in the liquid generating the vapors (gasoline/diesel) (wt%)
EF2 is a natural gas Emission Factor dependent on the sulfur content
C2 is a conversion from a (2,000 grains/MMscf) basis to a (1wt%) basis; use:
1435 where the Emission Factor is based on (2,000 grains/MMscf)
1 where the Emission Factor is based on (1wt%)
S2 is the sulfur content in natural gas (wt%)
EF3 is an Emission Factor that is not related to sulfur content
K is a factor to convert from kilograms to pounds; use:
2.20462 if the Emission Factor is in units of kilograms
1 if the Emission Factor is in units of pounds
U is the Usage (in units of MMscf, gal, hours, or pounds (of VOC load))

The variable H is evaluated specifically for the given scenario:

If usage is given as volume of fuel used and the Emission Factor is per MMBtu, then:

$$H = \text{HHV (MMBtu/volume)}$$

If usage is given as volume of fuel used and the Emission Factor is per volume of fuel, then:

$$H = 1$$

If usage is given in hours (HR) and the Emission Factor is per hp-hr, then:

$$H = \text{horsepower (hp)}$$

If usage is given in hours (HR) and the Emission Factor is per volume of fuel, then:

$$H = (\text{HR}) * (\text{typical fuel feed rate})$$

If usage is given in hours (HR) and the Emission Factor is per MMBtu, then:

$$H = (\text{HR}) * (\text{typical fuel feed rate}) * \text{HHV}$$

If usage is given in VOC load (pounds) and the emission factor is per MMBtu, then:

$$H = X * \text{HHV} / \text{density}$$

where HHV and density are for the fuel representing the vapor load

Source Information:

Control Device ID:

Type of unit:

Control efficiency: percent reduction of emissions

for Flares/Vcus:

NOx Load Factor override: weight fraction of vapor load, from stack test

CO Load Factor override: weight fraction of vapor load, from stack test

Pilot flame feed rate: MMscf per hour

Feed rate is required only if the usage is given in hours, rather than in MMscf.

Auxiliary fuel feed rate: MMscf per hour

Sulfur Content (default values):

	ppm
Natural Gas	6.97
LNG	0
Propane Gas	0
LPG	0
Butane Gas	0
Liquified Butane	0
Diesel	15
Gasoline	15
#2 Fuel Oil	15
#6 Fuel Oil	30,000

These are default values that are used in the absence of user entry of sulfur content.

Service Information:

page 3 of 3

Control Device ID:

Time Period (mm/yyyy):

Combustion fuel type: the vapor load is characterized as this type of combustion fuel, for purposes of applying combustion emission factors compiled from the emissions sources routed to this control device

Vapor load (lbs):

Pilot flame usage (U): default is total hours in period

Pilot flame usage units:

Auxiliary fuel usage (U): no default usage - requires user entry

Auxiliary fuel usage units:

Sulfur content S1: ppm, override for vapor load

Sulfur content S2: ppm, override for natural gas

Sulfur Content:

Combustion fuel (vapor load):

Sulfur content S1 (wt%): wt%, for given fuel vapor load

Sulfur content S2 (wt%): wt%, for natural gas pilot flame & aux fuel

Conversion of Usage Values (application of variable H):

Vapor Load HHV: MMBtu/gal

Vapor Load density: lb/gal

Pilot flame usage: MMscf

Auxiliary fuel usage: MMscf

Calculated Emissions (pounds):

Emissions (lbs) = (LF) * [total VOC load to control device from emissions sources]
 + (EF1*S1 + EF2*C2*S2 + EF3) * K * (U*H) for the pilot flame
 + (EF1*S1 + EF2*C2*S2 + EF3) * K * (U*H) for the auxiliary fuel (assist gas)

Pounds this period from:

Vapor Load to Control Device:		Natural Gas:			K factor to convert kilograms to pounds
	Gasoline	Pilot Flame	Auxiliary Fuel	TOTAL (lbs)	
CO2	0	#N/A	#N/A	#N/A	2.20462
N2O	0	#N/A	#N/A	#N/A	2.20462
CH4	0	#N/A	#N/A	#N/A	2.20462
NOx	0	unit?	unit?	0	1
CO	0	unit?	unit?	0	1
VOC	197	unit?	unit?	197	1
PM	0	unit?	unit?	0	1
SOx	0	unit?	unit?	0	1
Benzene	VOC*Zi	unit?	unit?	*	1
Ethylbenzene	VOC*Zi	unit?	unit?	*	1
Toluene	VOC*Zi	unit?	unit?	*	1
Xylenes	VOC*Zi	unit?	unit?	*	1
n-Hexane	VOC*Zi	unit?	unit?	*	1
Naphthalene	VOC*Zi	unit?	unit?	*	1
Formaldehyde	0.00	unit?	unit?	0.00	1

* need to compute the VOC*Zi values and then sum across the row

Company: **Phillips 66**Location: **Portland Terminal a, OR**Calculations for Tank No.: **3761**Emission estimates per EPA's AP-42 Chapter 7.1 (Nov 2006), for: **August 2019**

Meteorological Data:

Avg Atmos Pressure, Pa: **14.7465** psia
 Avg Ambient Temp, T_{aa}: **68.6** degrees F
 Avg Daily Temp Range, ΔT_a: **23.4** degrees F
 Avg Daily Solar Insolation, I: **1718.334** Btu / ft² day

Tank Data:

Tank Type: **FixedRoof** shell color: **white paint**
 Average alpha: **0.17** shell condition: **good**
 Tank Diameter: **120** ft shell alpha: **0.17**
 Tank Height: **40** ft roof color: **white paint**
 Maximum Fill Height: **38.6** ft roof condition: **good**
 Minimum Liquid Level: **1** ft roof alpha: **0.17**
 Net Working Height: **37.6** ft
 Fixed Roof Type: **Column-supported (cone)** effective roof height: **0** ft
 Average outage, H_{vo}: **20.2** ft
 Max Vent Setting: **0.03** psig
 Min Vent Setting: **-0.03** psig

Service Data:

Service (stored liquid): **Diesel**
 Product Factor, K_p: **1**
 Reid Vapor Pressure: _____ psi (if specified)
 ASTM Distillation Slope: _____ (if specified)
 Molecular Weight, M_v: **130** lb/lb-mol
 Liquid Bulk Temp, T_b: **71** degrees F
 Constant Temp Tank? **NO**
 Liquid Bulk Temp Basis? **given by user**
 Liquid Surface Temp, T: **72.2** degrees F
 True Vapor Pressure, P: **0.0092** psia
 Stock Vapor Density, W_v: **0.00021** lb/ft³

Vapor Pressure Constants:
 A: **12.101**
 B: **8907**
 C: _____

per AP-42 equation 1-26
 per AP-42 equation 1-24
 per AP-42 equation 1-21

Operational Data:

Throughput: **274,088** bbl per month
 Days this Period: **31** days
 Turnover Rate: **42.6** turnovers per year
 Turnover Factor, K_N: **0.871**

Calculated Values:

Vapor Space Expansion Factor, K_E = {ΔT_v / (T + 459.57)} + {(ΔP_v - ΔP_B) / (P_A - P)}

AP-42 eqn 1-7

where:

ΔT_v = **25.02727** deg F (deg R); daily temperature range in the vapor space

AP-42 eqn 1-8

T_{lx} = **78.46** deg F P_{vx} = **0.014** psiaT_{ln} = **65.95** deg F P_{vn} = **0.008** psiaΔP_v = **0.0060** psiaΔP_B = **0.06** psi; vent setting rangeK_E = **0.0433**Vented Vapor Saturation Factor, K_S = 1 / (1 + 0.053 P H_{vo})

AP-42 eqn 1-20

K_S = **0.9902**Vent Setting Correction Factor, K_B:K_B = 1; except when:K_N [(P_{BP} + P_A) / (P_I + P_A)] > 1

AP-42 eqn 1-36

K_B = [(P_I + P_A) / K_N - P] / [P_{BP} + P_A - P]

AP-42 eqn 1-37

where:

P_{BP} = **0.03** psig; vent pressure settingP_I = **21.45** psig; initial gauge pressure (nominal operating pressure)K_B = **1**

Emissions Estimate for:

August 2019

Standing Storage Loss: **67.94** lb per month
 Working Loss: **281.50** lb per month
 Total Emissions: **349.44** lb per month
0.1747 tons per month

AP-42 eqn 1-4

AP-42 eqn 1-35

AP-42 eqn 1-1

Company: Phillips 66Location: Portland Terminal a, ORCalculations for Tank No.: Rack Red Dye TankEmission estimates per EPA's AP-42 Chapter 7.1 (Nov 2006), for: **August 2019**

Meteorological Data:

Avg Atmos Pressure, Pa: 14.7465 psia
 Avg Ambient Temp, T_{aa}: 68.6 degrees F
 Avg Daily Temp Range, ΔT_a: 23.4 degrees F
 Avg Daily Solar Insolation, I: 1718.334 Btu / ft² day

Tank Data:

Tank Type:	<u>Horizontal</u>	shell color: <u>white paint</u>
Average alpha:	<u>0.17</u>	shell condition: <u>good</u>
Tank Diameter:	<u>4.4</u> ft	shell alpha: <u>0.17</u>
Tank Height:	<u>2.4</u> ft	roof color: <u>white paint</u>
Maximum Fill Height:	<u>1.36</u> ft	roof condition: <u>good</u>
Minimum Liquid Level:	<u>1</u> ft	roof alpha: <u>0.17</u>
Net Working Height:	<u>0.36</u> ft	
Fixed Roof Type:	<u>Horizontal Tank</u>	effective roof height: <u>0</u> ft
Average outage, H _{VO} :	<u>1.18</u> ft	
Max Vent Setting:	<u>0.03</u> psig	
Min Vent Setting:	<u>-0.03</u> psig	

Service Data:

Service (stored liquid):	<u>Unisol Liquid Red BK-50</u>		Vapor Pressure Constants:
Product Factor, K _P :	<u>1</u>		A: <u>12.39</u>
Reid Vapor Pressure:	<u> </u> psi	(if specified)	B: <u>8933</u>
ASTM Distillation Slope:	<u> </u>	(if specified)	C: <u> </u>
Molecular Weight, M _V :	<u>130</u> lb/lb-mol		
Liquid Bulk Temp, T _b :	<u>70.9</u> degrees F		
Constant Temp Tank?	<u>NO</u>		
Liquid Bulk Temp Basis?	<u>given by user</u>		
Liquid Surface Temp, T:	<u>72.2</u> degrees F	per AP-42 equation 1-26	
True Vapor Pressure, P:	<u>0.0117</u> psia	per AP-42 equation 1-24	
Stock Vapor Density, W _V :	<u>0.0003</u> lb/ft ³	per AP-42 equation 1-21	

Operational Data:

Throughput: 0 bbl per month
 Days this Period: 31 days
 Turnover Rate: 0.0 turnovers per year
 Turnover Factor, K_N: 1.000

Calculated Values:

Vapor Space Expansion Factor, K_E = {ΔT_V / (T + 459.57)} + {(ΔP_V - ΔP_B) / (P_A - P)} AP-42 eqn 1-7

where:

ΔT_V = 25.02727 deg F (deg R); daily temperature range in the vapor space AP-42 eqn 1-8T_{ix} = 78.46 deg F P_{Vx} = 0.014 psiaT_{in} = 65.95 deg F P_{Vn} = 0.010 psiaΔP_V = 0.0040 psiaΔP_B = 0.06 psi; vent setting rangeK_E = 0.0434Vented Vapor Saturation Factor, K_S = 1 / (1 + 0.053 P H_{VO}) AP-42 eqn 1-20K_S = 0.9993Vent Setting Correction Factor, K_B:K_B = 1; except when: $K_N [(P_{BP} + P_A) / (P_i + P_A)] > 1$ AP-42 eqn 1-36 $K_B = [(P_i + P_A) / K_N - P] / [P_{BP} + P_A - P]$ AP-42 eqn 1-37

where:

P_{BP} = 0.03 psig; vent pressure settingP_i = 1.1781 psig; initial gauge pressure (nominal operating pressure)K_B = 1

Emissions Estimate for:

	August 2019	
Standing Storage Loss:	<u>0.01</u> lb per month	
Working Loss:	<u>0.00</u> lb per month	
Total Emissions:	<u>0.01</u> lb per month	
	<u>0.0000</u> tons per month	

AP-42 eqn 1-4

AP-42 eqn 1-35

AP-42 eqn 1-1

Company: Phillips 66
 Location: Portland Terminal a, OR
 Calculations for Tank No.: 3407
 Emission estimates per EPA's AP-42 Chapter 7.1 (Nov 2006), for: **August 2019**

Meteorological Data:
 Avg Atmos Pressure, Pa: 14.7465 psia
 Avg Ambient Temp, Taa: 68.6 degrees F
 Avg Daily Solar Insolation, I: 1718.334 Btu / ft² day
 Avg Wind Speed, V: 7.1 mph
 shell color: white paint
 shell condition: good
 shell alpha: 0.17

Tank Data:
 Tank Type: IFRT
 Average alpha: 0.17
 Tank Diameter, D: 120 ft
 Rim Seal Type: Mechanical-Shoe Primary with NO Secondary
 roof color: white paint
 roof condition: good
 roof alpha: 0.17

$L_r = [(K_{ra} + K_{rb} V^n) D] \times [P^* M_v K_c]$ per AP-42 equation 2-2
 $L_r = [Fr] \times [P^* M_v K_c]$ defining a Rim Seal Emission Factor, Fr
 $Fr = [(K_{ra} + K_{rb} V^n) D]$
 Rim Seal Emission Factor (Fr): 696 lb-mol/yr

$L_d = [(K_d S_d) D^2] \times [P^* M_v K_c]$ per AP-42 equation 2-9
 $L_d = [Fd] \times [P^* M_v K_c]$ defining a Deck Seam Emission Factor, Fd
 $Fd = [(K_d S_d) D^2]$
 Deck Seam Emission Factor (Fd): 403 lb-mol/yr

$L_{fi} = [F_{fi}] \times [P^* M_v K_c]$ per AP-42 equation 2-5
 $F_{fi} = N_{fi} [K_{fi}]$ per AP-42 equation 2-6
 $K_{fi} = [K_{fai} + K_{fbi} (K_v V)^{m_j}]$ per AP-42 equation 2-7
 Guidepole Emission Factor (F_{gp}): 21 lb-mol/yr
 Deck Fittings Emission Factor (F_{fi-n}): 432 lb-mol/yr (all deck fittings other than the guidepole)
 Total Emission Factors (Fr + Fd + Ff): 1,552 lb-mol/yr
 Number of columns, Nc: 16
 Effective column diameter, Fc: 1 feet

Service Data:
 Service (stored liquid): Gasoline RVP X.XX
 Product Factor, K_C: 1
 Reid Vapor Pressure: 7.8 psi (if specified)
 ASTM Distillation Slope: 3 (if specified)
 Molecular Weight, M_v: 66 lb/lb-mol
 Liquid Bulk Temp, T_b: 68.6 degrees F
 Constant Temp Tank? NO
 Liquid Bulk Temp Basis? calculated from ambient, per AP-42 equation 1-28
 Liquid Surface Temp, T_{la}: 70.9 degrees F per AP-42 equation 1-26
 True Vapor Pressure, P_{va}: 4.873 psia per AP-42 equation 1-25
 $P^* = [P_{va}/P_a] / [1 + (1 - P_{va}/P_a)^{0.5}]^2$
 Vapor Pressure Function, P*: 0.09994 dimensionless per AP-42 equation 2-3
 Liquid density, Wl: 5.6 lb/gal
 Clingage factor, Cs: 0.0015 bbl per 1000 sq.ft.

Operational Data:
 Throughput, Q: 555,775 bbl per month

Emissions Estimate for: August 2019
 Days This Period: 31
 Standing Storage Loss (L_r + L_d + L_f) = [Fr + Fd + Ff] × [P* M_v K_c] per AP-42 equations 2-2, 2-5, 2-9
Standing Storage Loss: 869.55 lb per month
 Withdrawal Loss (L_{wd}) = [(0.943 Q Cs Wl)/D] × [1 + (Nc Fc)/D] per AP-42 equation 2-4
Withdrawal Loss: 41.58 lb per month
Total Emissions: 911.13 lb per month per AP-42 equation 2-1
0.456 tons per month

Phillips 66
Portland Terminal, WA
Sample Calculations for Furnaces

page 1

Combustion Units - Boilers

General notes:

Combustion units generate emissions as by-products of combustion. These emissions are estimated from emission factors that may depend on the type of combustion unit, the size of the unit, the type of fuel, and the usage (i.e., the volume of fuel combusted in the given time period). The emission factors vary in terms of the units of measurement used, and thus the estimation of emissions requires conversion of the emission factor values to the units of measurement used in the equations.

Furthermore, usage may be given gallons for liquid fuels, million standard cubic feet (MMscf) for gaseous fuel, or in hours of usage. The usage units must then be reconciled with the units of measurement in the equations.

Emission factors for products of combustion are from AP-42, except for greenhouse gases, for which the emission factors are from EPA's GHG MRR -- 40 CFR Part 98 Subpart C, Tables C-1 & C-2.

High heat values (HHV) used to convert fuel volume to MMBtu are from EPA's GHG MRR Subpart C, Table C-1.

General equation:

$$\text{Emissions (lbs)} = (\text{EF1} \cdot \text{S1} + \text{EF2} \cdot \text{C2} \cdot \text{S2} + \text{EF3}) \cdot \text{K} \cdot (\text{U} \cdot \text{H})$$

where:

- EF1** is a fuel oil Emission Factor dependent on the sulfur content
- S1** is the sulfur content in fuel oil (wt%)
- EF2** is a natural gas Emission Factor dependent on the sulfur content
- C2** is a conversion from a (2,000 grains/MMscf) basis to a (1wt%) basis; use:
1,435 where the Emission Factor is based on (2,000 grains/MMscf)
1 where the Emission Factor is based on (1wt%)
- S2** is the sulfur content in natural gas (wt%)
- EF3** is an Emission Factor that is not related to sulfur content
- K** is a factor to convert from kilograms to pounds; use:
2.20462 if the Emission Factor is in units of kilograms
1 if the Emission Factor is in units of pounds
- U** is the Usage (in units of MMscf, gal, or hours)
- H** is evaluated specifically for the given scenario:

If usage is given as volume of fuel used and the Emission Factor is per MMBtu, then:

$$\text{H} = \text{HHV (MMBtu/volume)}$$

If usage is given as volume of fuel used and the Emission Factor is per volume of fuel, then:

$$\text{H} = 1$$

If usage is given in hours (HR) and the Emission Factor is per hp-hr, then:

$$\text{H} = \text{horsepower (hp)}$$

If usage is given in hours (HR) and the Emission Factor is per volume of fuel, then:

$$\text{H} = (\text{HR}) \cdot (\text{typical fuel feed rate})$$

If usage is given in hours (HR) and the Emission Factor is per MMBtu, then:

$$\text{H} = (\text{HR}) \cdot (\text{typical fuel feed rate}) \cdot \text{HHV}$$

Source Information:

Source ID:	Portland Terminal a, OR	
Type of unit:	Boiler	
MMBtu/hr	<100 MMBtu/hr	for boilers/heaters/furnaces
Type of Fuel:	natural gas	
Typical fuel feed rate:	0.004166	MMscf per hour

Sulfur Content (default values):

Sulfur content S1:	15	ppm, for diesel / #2 fuel oil	These are default values that are used in the absence of user entry of sulfur content.
Sulfur content S2:	6.96864	ppm, for natural gas	
<u>Convert ppm to weight percent:</u>			
Sulfur content S1:	1.50E-03	wt%, for diesel / #2 fuel oil	
Sulfur content S2:	6.97E-04	wt%, for natural gas	

Service Information:

page 2

Source ID: Portland Terminal a, OR

Time Period (mm/yyyy): Aug-2019

Usage input value: 2.21

Usage units: MMscf

Sulfur content S1: ppm, for fuel oil not applicable for gas-fired units

Sulfur content S2: ppm, for natural gas

Sulfur Content:

Sulfur content S1: 0.0015 wt%, for fuel oil not applicable for gas-fired units

Sulfur content S2: 0.0007 wt%, for natural gas

Conversion of Usage Values (application of the variable H):

Usage input value: 2.21 MMscf

Fuel feed rate: 0.004166 MMscf per hour

Fuel usage: 2.21 MMscf

HHV: 1028 MMBtu/MMscf

Energy usage (U*H): 2,272 MMBtu

Calculated Emissions (pounds):

Emissions (lbs) = (EF1*S1 + EF2*C2*S2 + EF3) * K * (U*H)

code for EF lookup:				Emission Factor		Emissions	
EF1	EF2	C2	EF3	Units	K		This Period (lb)
			53.02	kg/MMBtu	2.20462	CO2	265,557.67
			1.00E-04	kg/MMBtu	2.20462	N2O	0.50
			1.00E-03	kg/MMBtu	2.20462	CH4	5.01
8			100.000	lb/MMscf	1	NOx	221.00
9			84	lb/MMscf	1	CO	185.64
11			5.50E+00	lb/MMscf	1	VOC	12.16
12	0.00E+00		1.90E+00	lb/MMscf	1	PM	4.20
14	0.00E+00	6.00E-01	0.00E+00	lb/MMscf	1	SOx	1.33
19			2.10E-03	lb/MMscf	1	Benzene	0.00
20			No Data	lb/MMscf	1	Ethylbenzene	No Data
21			3.40E-03	lb/MMscf	1	Toluene	0.01
22			No Data	lb/MMscf	1	Xylenes	No Data
23			1.80E+00	lb/MMscf	1	n-Hexane	3.98
24			6.10E-04	lb/MMscf	1	Naphthalene	0.00
25			7.50E-02	lb/MMscf	1	Formaldehyde	0.17

KELLY W. HAYES
Senior Environmental Consultant
Midstream Operations

PHILLIPS 66
520 East D Street
Tacoma, WA 98421
Office: (253) 207-5569
Kelly.W.Hayes@p66.com



January 22, 2020

Mr. Dave Kauth
Oregon DEQ NW Region
700 NE Multnomah St., Suite 600
Portland, OR 97232

UPS 1Z E53 32W 02 9388 8362

RE: 40 CFR 63, Subpart BBBB
GD-GACT Semi-Annual Report
Portland Products Terminal
Permit 26-2026
Phillips 66

Dear Mr. Kauth:

Phillips 66 (P66) owns and operates the Portland Products Terminal, a bulk storage and loading terminal, for finished gasoline and distillate products. The terminal is subject to the Gasoline Distribution Generally Available Control Technology (40 CFR 63, Subpart BBBB GD-GACT) because it is a minor source under Title III of the 1990 Clean Air Act Amendments.

The attached report summary and certification meets the semi-annual reporting requirements of §63.11095(a) and (b) as well as §63.10(e)(3).

If you have any questions about this report or require any additional information, please call at (253) 207-5569.

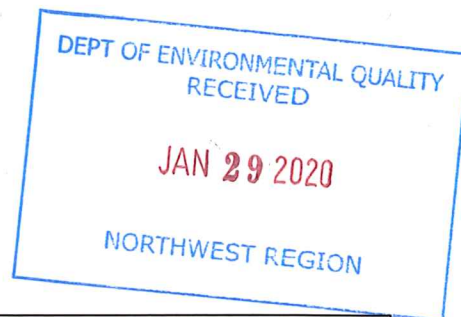
Sincerely,

Kelly W Hayes

Cc:
Regional Administrator
United States Environmental Protection Agency, Region 10
1200 Sixth Ave, Suite 900, AWT-107
Seattle, WA 98101

UPS 1Z E53 32W 02 9444 8157

Phillips 66
Portland Products Terminal
GD-GACT Semi-Annual Report
Bulk Gasoline Terminal



Reporting Period: July 01 through December 31, 2019

Regulatory Section	Report Type	Status
40 CFR 63.11095(a)(1)	Semi-Annual Compliance	The following gasoline storage tank seal inspections were conducted during this reporting period. Through Hatch Visual Inspections – 8/8 10yr up-close Visual – T-3408 9/18
40 CFR 63.11095(a)(2) 40 CFR 63.11095(b)(1&2)	Semi-Annual Compliance and Excess Emission	All gasoline cargo tanks vapor tightness documentation was received by the facility prior to granting the authorization to load. The facility computer system will not allow loading of a cargo tank unless vapor tightness documentation is on file for the specific trailer.
40 CFR 63.11095(a)(3) 40 CFR 63.11095(b)(5)	Semi-Annual Compliance	The first attempt at repair occurred within 5 days and all leaks were repaired within fifteen days of detection.
40 CFR 63.11095(b)(3)	Semi-Annual Excess Emission	All VRU monitored operating parameters were within normal ranges, with no excess emissions during this period based on 80 mg/L limit for GD GACT.
40 CFR 63.10(e)(3)(i-viii) 40 CFR 63.11095(b)	Excess Emission	There were no excess emissions during this period.
40 CFR 63.10(e)(3)(vi)(K)	Changes to CMS process or controls	None

I, Gabe Munoz, certify that to the best of my knowledge, that the statements and information submitted in this report are true, accurate and complete and they demonstrate compliance with the relevant standards of the Gasoline Distribution GACT (40 CFR 63, Subpart BBBBBB).

Signature: Gabe Munoz Date: 01/24/2020

Name and Title: Gabe Munoz, Manager Western Region

**Phillips 66 Company
Portland Products Terminal
40 CFR 63 A and BBBBBB**

**Summary Report
Gaseous and Opacity Excess Emissions and Continuous Monitoring System Performance**

Reporting Period: July 01 to December 31, 2019

Facility Name: Phillips 66 Portland Terminal
Address: 5528 NW Doane Ave
Portland, OR 97201

Description of Process Unit:

Gasoline truck loading rack with a 2-bed carbon adsorption Vapor Recovery Unit (VRU)

Hazardous Air Pollutants Monitored:

Gasoline Vapors containing one or more of the following HAPs: Benzene, Cumene, Ethylbenzene, Hexane, Naphthalene, Toluene, Total Xylenes, 2,2,4-trimethylpentane

Emission Limitations:

40 CFR 63 BBBBBB: 80 mg VOC / Liter of gasoline loaded
Facility Permit: 26-2026

Operational Limits:

Facility Permit Limit: 80 mg VOC / Liter of gasoline loaded

Monitoring Equipment Details:

Type: CEMS
Manufacturer: Infrared Industries
Model Number: IR8400 D

Latest CMS Certifications and/or Audits:

Certification Date: 6/20/2018

Description: Performance Evaluation

Audit Date: NA

Description: Cylinder Gas Audit

VRU System total operating time during reporting period: 4,416.00 hours

Changes to the CMS, processes or controls were made since the last reporting period: None

If Yes, describe the changes.

Emission Data Summary

(§63.10(e)(3)(vi)(I))

Basis for Excess Emission	Total Hours	Percentage of Total
Total operating time during reporting period:	4,416	
Total duration of excess emissions:	0.00	0.00
Total duration of excess emissions due to:		
Startup / Shutdown:	0.00	0.00
Control equipment problems:	0.00	0.00
Process Problems:	0.00	0.00
Other known causes:	0.00	0.00
Other unknown causes:	0.00	0.00
TOTAL:	0.00	0.00

CMS Performance Summary

(§63.10(e)(3)(vi)(J))

Basis for CMS Downtime	Total Hours	Percentage of Total
Total operating time during reporting periods:	4,416	
Total CMS downtime:	2.31	0.05
Summary CMS downtime causes:		
Monitoring equipment malfunctions:	0.00	0.00
Non-monitoring equipment malfunctions:	1.70	73.49
Quality assurance/control calibrations:	0.61	26.51
Other known causes:	0.00	0.00
Other unknown causes:	0.00	0.00
TOTAL:	2.31	100.00

Total duration of excess emissions and/or exceedances of control system parameter greater than 1% of the total operating time during reporting period?

No

Total CMS downtime greater than 5% of the total operating time during reporting period?

No

If NO to both of the above, **only** the summary report must be submitted for the reporting period.

If YES to either of the above, a full report must be submitted for the reporting period. This report must include:

Summary Report

Full Excess Emissions Data

CMS Performance Report

Attachment - CEMS/CMS Output Reports

Attachment - CEMS/CMS Output Reports