

## AIR POLLUTION CONTROL DIVISION PRELIMINARY ANALYSIS

**PERMIT NUMBER:** 14PO1437  
**APPLICANT:** TriStar Global Vapor Control

**DATE:** October 21, 2014

**ENGINEER:** Renee Lee  
**CP SUPERVISOR:** R K Hancock III, P.E.

### PROJECT DESCRIPTION

The company listed above has applied for an air emission permit to construct and operate a portable LPG-fired thermal oxidizer for reduction of volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions during tank degassing and cleaning at multiple sites in Colorado.

### SUMMARY OF EMISSIONS (tons/year)

AIR POLLUTANT	CONTROLLED EMISSIONS	POTENTIAL TO EMIT	REMARKS
VOC	39.0	971.1	Source is a synthetic minor source for Title V, Non Attainment New Source Review, and Prevention of Significant Deterioration programs.
Benzene	0.1	2.2	
Toluene	0.4	10.0	
Ethyl benzene	0.01	2.7	
Xylene	0.01	4.3	
Hexane	0.02	8.7	

The Division has determined that the above emission source will comply with all applicable regulations and standards, and plans to issue an emission permit. A copy of the draft permit is included in the public comment packet.

### SOURCE CLASSIFICATION

The thermal oxidizer has the potential to emit (PTE) a total of 971.1 tons of VOC per year, 10.0 tons of toluene per year, and 28 tons of total HAPs per year. After controls and operational limitations were applied, VOC emissions will not exceed 39 tons per year, toluene emissions will not exceed 0.4 tons per year, and total HAPs will not exceed 0.5 tons per year. Because this source has PTE greater than 100 tons per year of a criteria pollutant, 10 tons per year of a single HAP, and 25 tons per year of total HAPs, but will control emissions to levels below 100, 10, and 25 tons per year, this source is classified as a synthetic minor facility. As a synthetic minor facility, this source is required to undergo a public comment process. Also, because permitted emissions of VOC are greater than 25 tons per year and source may be located in a non-attainment area, this source is required to undergo a public comment process.

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