

Permit by Rule (PBR) Registration Technical Review

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|---------------------------|--------------------------|--------------------------------|------------------|
| Company: | KM Liquids Terminals LLC | Registration No.: | 178958 |
| Nearest City: | Galena Park | Project No.: | 388041 |
| County: | Harris | Project Type: | Initial |
| Project Reviewer: | Thomas Greinert | Regulated Entity No.: | RN100237452 |
| Unit Name: | Galena Park Terminal | Customer Reference No.: | CN603254707 |
| PBR No(s).: | 106.261 | Project Received Date: | January 27, 2025 |
| Physical Location: | 906 Clinton Dr | | |

Project Overview / Process Description

KM Liquids Terminals LLC owns and operates the Galena Park Terminal site in Galena Park, Harris County, Texas. The site is currently authorized under various permits including NSR Permit 2193 and Title V Permit O988. This project is to increase the annual emission cap for the vapor combustion unit (EPN K-VCU-1A & 1B) due to an increase in gas flow to the vapor combustor unit. There are no upstream or downstream effects from this project.

Company has confirmed that the following: 1) the hourly emissions will stay at or below current authorized emission thresholds; 2) there will be no changes to any underlying air authorizations for the applicable units associated with BACT or health and environmental impacts; and 3) this project is certified via PI-7- CERT. This project will not circumvent major new source review requirements under 30 TAC Chapter 116.

This project will be incorporated into NSR Permit 2193 at the next amendment or renewal.

Permit by Rule Requirements - 30 TAC Chapter 106

General Requirements

| | | |
|---|--|--|
| Registration Fee Reference No.: | Application fee: 744358 / 582EA000646960 | |
| Is this registration certified? | Yes | |
| Is planned MSS included in the registration? | No | |
| Are there affected NSR or Title V authorizations for the project? | Yes | |
| NSR and/or Title V authorizations: | NSR Permit 2193 and Title V Permit O988 | |
| If there are affected Title V authorizations, is monitoring being submitted as part of this registration? | No | |
| Are there any upstream or downstream affects associated with this registration? | No | |
| Are associated upstream/downstream emissions either included in the registration OR within current permitted limits with no changes to underlying air authorizations for the applicable units regarding BACT, health and environmental impacts, or other representations. | NA | |
| Are emissions for each PBR authorized facility less than the § 106.4(a)(1) limits? | Yes | |
| Are total emissions from all sitewide PBR authorized facilities less than the § 106.4(a)(4) limits, OR has the site been subject to public notice requirements? | Yes, site has been to public notice. | |
| Are there permit limits on using PBRs at the site? | No | |
| Is the facility subject to the NO _x Mass Cap and Trade Program? | Yes* | |
| Is the facility in compliance with all other applicable rules and regulations? | Yes | |
| Does the registration include an appropriate PBR workbook, and has the workbook been verified? | Yes | |
| Notes: *Company will obtain allowances as necessary. | | |

Federal Applicability

| | |
|--|------------------------------|
| Does this project trigger a PSD or Nonattainment review? | No |
| Does the Major NSR applicability analysis include all associated upstream and/or downstream emissions? | NA |
| Are there any applicable standards under NSPS, NESHAP, or NESHAP for source categories (MACT)? | Yes |
| If Yes, list applicable subparts: | NSPS K, Ka, Kb; MACT R, EEEE |
| Notes: | |

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Permit by Rule Requirements - Compliance Demonstrations

PBR 106.261 Facilities (Emission Limitations)

- (a)(1) The facilities or changes will be located > 100 ft from any off-site receptor.
(a)(2) Total new or increased emissions authorized by this section are below 6.0 pounds per hour (lb/hr) and ten tons per year.
(a)(3) No 106.261(a)(3) chemicals are authorized with this project.
(a)(4) There will not be any changes or additions of any existing abatement equipment.
(a)(5) Visible emissions will not exceed the 5.0 % opacity limit.
(a)(6)-(7) Notification and all required documentation have been submitted.
(b) This registration is not for authorization for construction or to change a facility authorized under another section of this chapter or under standard permit.

Notes:

Compliance History and Site Review

In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on: **February 18, 2025**
Site rating / classification: **3.20 / Satisfactory** Company rating / classification: **8.17 / Satisfactory**
Has any action occurred on the basis of the compliance history or rating? **No**
Did the Regional Office provide site approval and confirm distances? **NA**

106.261(a)(2) Emissions

| Chemical | Criteria Pollutant Designation | CAS No. (optional input) | Emission Threshold (lb/hr) | Emission Threshold (tpy) | Hourly Emissions (lb/hr) | Annual Emissions (tpy) | Meets Threshold? |
|---|--------------------------------|--------------------------|----------------------------|--------------------------|--------------------------|------------------------|------------------|
| Carbon Monoxide | Other | | 6 | 10 | 0.00E+00 | 6.53E+00 | Yes |
| Oxides of Nitrogen | Other | | 6 | 10 | 0.00E+00 | 4.90E+00 | Yes |
| Sulfur Dioxide | Other | | 6 | 10 | 0.00E+00 | 2.00E-02 | Yes |
| Refinery Petroleum Fractions (except for pyrolysis naphthas and pyrolysis gasoline) containing less than ten volume percent benzene | VOC | | 6 | 10 | 0.00E+00 | 1.70E-01 | Yes |
| Refinery Petroleum Fractions (except for pyrolysis naphthas and pyrolysis gasoline) containing less than ten volume percent benzene | PM | | 6 | 10 | 0.00E+00 | 2.40E-01 | Yes |

Total 106.261 Combined Emissions

| | Total Hourly Emissions (lb/hr) | Total Annual Emissions (tpy) |
|--|--------------------------------|------------------------------|
| Total VOC Emissions: | 0.00E+00 | 1.70E-01 |
| Total NO_x Emissions: | 0.00E+00 | 4.90E+00 |
| Total SO₂ Emissions: | 0.00E+00 | 2.00E-02 |
| Total CO Emissions: | 0.00E+00 | 6.53E+00 |
| Total PM Emissions: | 0.00E+00 | 2.40E-01 |

Note: Only increases are shown.

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Emission Summary

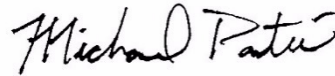
| EPN / Emission Source | VOC | | NOx | | CO | | PM ₁₀ | | PM _{2.5} | | SO ₂ | |
|---|-----------|-------------|-----------|-------------|-----------|-------------|------------------|-------------|-------------------|-------------|-----------------|--------------|
| | lb/hr | tpy | lb/hr | tpy | lb/hr | tpy | lb/hr | tpy | lb/hr | tpy | lb/hr | tpy |
| TK-VCU-1A & 1B / Annual Routine Tank Roof Landing Emissions Control Cap | -- | 0.17 | -- | 4.90 | -- | 6.53 | -- | 0.24 | -- | 0.24 | -- | 0.07 |
| TOTAL EMISSIONS (TPY): | -- | 0.17 | -- | 0.49 | -- | 6.53 | -- | 0.24 | -- | 0.24 | -- | 0.07 |
| MAXIMUM OPERATING SCHEDULE: Hours/Year | | | | | | | | | | | | 8,760 |



3/3/2025

Mr. Thomas Greinert
Permit Reviewer
Rule Registration Section

Date



3/3/2025

Michael Partee, Manager
Rule Registrations Section
Air Permits Division

Date