MEMO TO: R.D. Siegel

FROM: K.H. Kennedy

SUBJECT: Typical sources of hydrocarbon and particulate emissions of

100 tons per year

An analysis has been performed based on the EPA's "Compilation of Air Pollutant Emission Factors" of the size and various facilities required to emit 100 tons per year of either hydrocarbons or particulates. The attached table summarizes the findings. These facilities listed in the attached table would be subject to offset review due to emission of . 100 tons of the pollutant of interest per year.

The analysis also showed that storage of petroleum products should be an important consideration for hydrocarbon emissions in the offset review process. The following is a comparison of the evaporative hydrocarbon loss from the two most common types of new gasoline storage tanks (assuming typical conditions for the tanks of a 67,000 barrel capacity, 48' height, 110' diameter, and 13 refills per year).

One Fixed Roof tank:

Breathing Losses = $\frac{113 \text{ tons/year}}{\text{Working Losses (filling, etc.)}} = \frac{165 \text{ tons/year}}{278 \text{ tons/year}}$

One Floating Roof tank: Total = 17 tons/year

KHK/dmc