Permit to Construct
Vapor Recovery & Fuel Gas Treating System
Process 8, System 2

COMPANY NAME, MAILING AND LOCATION ADDRESS:

Name: Tesoro Refining & Marketing Company, LLC
SCAQMD ID# 151798
Facility Type: NOx & SOx RECLAIM (Cycle 1), Title V

Mailing: 2101 E. Pacific Coast Highway
Wilmington, CA 90744-2914

Location: 23208 S. Alameda St.
Carson, CA 90810-1919

Contact : Royann Winchester
Environmental Engineer
(310) 522-6125

EQUIPMENT DESCRIPTION:

Additions are noted in underlines. Deletions are noted by ~~strikeouts~~.

The following equipment will be moved from Section D to Section H of Title V Facility Permit, ID# 151798; Process 8, System 2

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 8: AIR POLLUTION CONTROL					
System 2: VAPOR RECOVERY & FUEL GAS TREATING SYSTEM					S15.4
VESSEL, FLASH, V-1271, LENGTH: 12 FT; DIAMETER: 6 FT A/N: ~~469455~~ 553830	D89				
POT, WATER SEAL, V-1272, HEIGHT: 5 FT; DIAMETER: 1 FT 6 IN A/N: ~~469455~~ 553830	D91				
VESSEL, FLASH, V-1292, LENGTH: 12 FT; DIAMETER: 6 FT A/N: ~~469455~~ 553830	D90				

POT, WATER SEAL, V-1293, HEIGHT: 5 FT; DIAMETER: 1 FT 6 IN A/N: ~~469455~~ 553830	D92				
COMPRESSOR, C-115, RECIPROCATING TYPE, ~~25~~ **50**-HP A/N: ~~469455~~ 553830	D95				
COMPRESSOR, C-196, SPARE, RECIPROCATING TYPE, 50- HP **A/N: 553830**	**Dxxx**				E71.x, H23.x, K171.x
ABSORBER, V-~~1256~~ **3585**, HEIGHT: 18 FT; DIAMETER: 1 FT 3 IN A/N: ~~469455~~ 553830	D97				
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: ~~469455~~ 553830	D138				H23.1

CONDITIONS

S15.4 The vent gases from all affected devices of this process/system shall be vented as follows:

All emergency vent gases shall be directed to a flare system.

This process/system shall not be operated unless the flare system is in full use and has a valid permit to receive vent gases from this system.

[**RULE 1303(a)(1)-BACT, 5-10-1996;** RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 1303(b)(2)-Offset, 5-10-1996;** RULE 1303(b)(2)-Offset, 12-6-2002]

[Systems subject to this condition : Process 1, System 1 , 2 , 3 , 4 , 5; Process 2, System 1 , 2 , 3 , 4 , 5; Process 5, System 1; Process 8, System 2]

E71.x The operator shall only operate this equipment when the primary compressor C-115 is taken out of service, except for 30 minutes of simultaneous operation of both compressors while the primary compressor is being taken out of service or put back online.

[**RULE 1303, 5-10-1996,** RULE 1303, 12-6-2002]

[Devices subject to this condition: **Dxxx**]

H23.1 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1173

[**RULE 1173, 5-13-1994;** RULE 1173, 6-1-2007]

[Devices subject to this condition : D135, D136, D137, D138, D184, D185, D186, D187, D188, D189, D190, D191, D192, D193, D194, D195, D196]

H23.x This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	40 CFR60, SUBPART	GGGa

[**40CFR 60 Subpart GGGa, 6-2-2008**]

[Devices subject to this condition: **Dxxx**]

K171.x The operator shall provide to the District the following:

Final drawings and/or specifications of the equipment installed/constructed shall be submitted to the SCAQMD within 60 days after completion.

A recalculation of the fugitive emissions based on actual components installed and removed from service shall be submitted to the SCAQMD within 60 days after completion.

A listing of all new valves and flanges categorized by type, and including tag no., size, application and service shall be submitted to the SCAQMD within 60 days after completion.

[**RULE 1303(b)(2)-Offset, 5-10-1996**]

[Devices subject to this condition: **Dxxx**]

COMPLIANCE RECORD REVIEW

A printout of the facility's compliance history is shown in Attachment 1. All NCs and NOVs issued since 2009 are shown as either 'closed' and/or 'in compliance' in the District's CLASS data base and Facility Information Detail (FIND) system.

BACKGROUND

The Sulfur Recovery Plant (SRP) of Tesoro Refining & Marketing Company, LLC is a support facility for the Tesoro Los Angeles Refinery (ID # 800436) in the city of Wilmington. Its primary function is to recover sulfur from sour water and Diethanolamine (DEA) solution containing hydrogen sulfide and ammonia generated at the Los Angeles Refinery. The lean (hydrogen sulfide free) DEA solution from the SRP is sent back to the refinery for reuse in the Hydrotreating units and stripped water is returned to the refinery for reuse and/or processing before disposal.

The SRP has been in continual operation since 1948. As a Cycle 1, coastal zone facility for NOx and SOx RECLAIM, it first entered the program on October 15, 1993 under its earlier ownership of Texaco. The most recent ownership change took place in 2007, when the facility was purchased by current owner Tesoro Refining & Marketing Company, LLC from Equilon, LLC. The facility was issued its initial Title V permit on October 26, 2009.

The subject application was submitted to modify the vapor recovery and fuel gas treating permit unit (Process 8, System 2 in Title V facility permit) by installing a new spare vapor recovery compressor, C-196 (Dxxx). The spare compressor is identical to the existing compressor[1], C-115 (D95) and will allow the SRP to maintain operations of the vapor recovery system in the event the primary compressor is taken out of service for maintenance or when the compressor suction knockout drum is taken out of service for scheduled inspections to comply with API 510 – Pressure Vessel Inspection Code. The spare compressor will not operate unless the primary compressor is off line except during switching operations, where both can operate simultaneously for a short duration (see condition E71.x).

Similar to the existing compressor, the spare unit is a single-cylinder, reciprocating compressor rated at 251 SCFM at 450 rpm, driven by an electric Baldor-Reliance motor rated at 50 HP. The spare unit will be installed adjacent to the existing unit and the inlet/outlet piping will be configured into the existing lines by installing block valves and associated flanges such that new compressor can be operated independently of D95, acting as a true spare. The equipment data sheet of the proposed spare compressor, before and after PFD and P&IDs are contained in the application folder for reference.

APPLICATIONS/FEE SUMMARY

Tesoro has requested expedited processing of the application so that installation can commence as soon as the Permit to Construct (PC) is issued. Table 1 below summarizes the applications/fees submitted by Tesoro for this project.

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[1]*According to Tesoro, the electric motor for primary compressor C-115 was replaced (from 25 to 50 HP) because of frequent electrical overloads caused by high amperage from age, but the operation of the compressor remained unchanged. For additional information, see Table 2 – Compressor Specifications.*

Table 1 – AQMD Applications Submitted

A/N	Equipment	Device ID	Type	Status	Requested Action	Deemed Complete	Fee Schedule	Fee Required	Expedited Fee	Fee Paid
553829	TV Permit Revision	NA	86	21	Revise TV permit	8/23/13	-	$1,824.90	-	$1,789.12
553830	Vapor Recovery System	**Dxxx**[1]	10	20	Install new compressor (spare)	8/23/13	E	$5,567.77	$2,783.89	$8,187.90
							Total	**$7,392.67**	**$2,783.89**	**$9,977.02**

[1] *New device ID to be assigned by FP program.*

PROCESS DESCRIPTION

As discussed earlier, the SRP processes rich DEA and sour water from the Tesoro Los Angeles Refinery to produce saleable liquid sulfur and returns lean DEA and stripped water back to the refinery for reuse. The incoming streams are received into tankage prior to being pumped to stripping units where most of the H2S is removed and used as feed for the sulfur recovery Claus units, where the H2S is converted into elemental sulfur.

The SRP vapor recovery system (VRS) recovers off gases from six DEA (lean and rich) surge tanks, one foul water storage tank, and one sour (skimmed) hydrocarbon storage tank. Essential components of this VRS consist of a small vapor recovery compressor (D95) that compresses vapors from the above tanks and delivers it [after H2S removal by absorber V-3585, (D97)] to the absorber knockout drum V-1499 and onto the main fuel gas header. The VRS maintains a 'blanket' of fuel gas on the amine, foul water, hydrocarbon and lean solvent storage tanks at a very slight but constant positive pressure. The tanks on the south side of the plant (T-1026/27/28/29/30) and tanks on the north side of the plant (T-1020, 1025) are connected by a common equalizing line. Each group of tanks has a pair of self-acting, extremely sensitive Shand & Jurs control valves which are set to maintain the tank pressure between ¼" to ½" of water (0.01 to 0.02 psig).

The presence of air in the tanks would result in explosive mixtures of H2S and hydrocarbons. The VRS allows normal tank 'breathing' without the introduction of air or loss of hazardous vapors to the atmosphere. When the tank pressure increases due to rising levels or the release of vapors, the VRS compressor will remove the excess gas. If the tank level is dropping, natural gas is bled into the tank to prevent the creation of a vacuum while maintaining a slight positive pressure. Under normal operations, the VRS is capable of recovering all the off gases from these tanks. Under abnormal operations, such as refinery upsets that lead to abnormally high levels of hydrocarbons entrained in the rich DEA, the compressor can be overloaded and excess vapors are vented to the flare.

The VRS is an essential component of the SRP operations. Without the service of the vapor recovery compressor, the SRP would not be able to sustain operations without violating numerous Districts rules and permit conditions. In the past, the SRP has sought Title V Alternative Operating Condition

(AOC) and Variance coverage through the District Hearing Board (HB) whenever the compressor had to be taken out of service for maintenance and/or API 510 inspections. The most recent was for HB Variance/Title V AOC Case No. 4982-88 in June 2011.

Note that as part of this permit revision, the facility equipment ID shown in the permit for device D97 has been changed from V-1256 to V-3585. Tesoro has indicated this absorber vessel was replaced with an identical vessel unit when it was determined during the maintenance outage in June 2011, under Variance/Title V AOC Case No. 4982-88, that the vessel had reached the end of its useful life. A permit was not required to make this change pursuant to Rule 219(c)(3) because it was a replacement in kind (identical). Supporting documents to justify this was an identical replacement have been submitted by Tesoro and are contained in the application folder for reference. Tesoro has assigned a new equipment ID number (V-3585) to the absorber vessel as a result of this change.

Table 2 below shows the equipment specification of the spare compressor to be installed, along with the specification of the current compressor that is in operation. A compressor capacity of 251 SCFM has been demonstrated to handle the off gases from the tanks during normal operations.

Table 2 – Compressor Specifications

Compressor	Device ID	Manufacturer	Model No./Size	Type	Capacity, SCFM	Driver Type	BHP
C-196 (spare)	Dxxx	Pennsylvania	3-AT/10-7	Reciprocating	251	Electric Motor	50
C-115 (main)	D95	Pennsylvania	3-AT/10-7	Reciprocating	251	Electric Motor	~~25~~ 50[1]

[1]*Although the permit indicates D95 as being driven by a 25 HP motor, this information is outdated according to Tesoro. The 25 HP motor was replaced by a 50 HP motor some time ago to eliminate frequent electrical overloads caused by the 'aged' motor running at high amperage. This change in HP did not affect the capacity or potential of the compressor to do work but did affect the reliability of the power to the compressor. Since there is no emissions impact from this change in motor rating, the motor rating for D95 will be updated to 50 BHP as part of this permit revision. Please see email response from Tesoro dated 9-9-13 in application folder for detail explanation.*

EMISSIONS

As a spare compressor that will only operate when the main compressor (D95) is taken out of service, the only emission increase associated with this project are from the new fugitive components that will be installed to integrate the new spare unit with the existing unit (see piping plan Dwg nos. SK-610-001 and SK-610-002 in application folder). Fugitive emissions calculation, based on the components that will be installed for this project, were submitted by the facility and contained in Attachment 2 for reference. As shown, the increase in ROG emissions is anticipated to be 0.18 lb/day (versus 0.26 lb/day if non-bellow seal valves were used instead). There is no impact on NOx, SOx, CO or PM emissions from this project.

Although there is an increase in ROG emissions for this project, this increase did not trigger any NSR implications since it's below 0.42 lb/day. Nonetheless, the use of bellow seal valves is considered Best Available Control Technology (BACT).

An analysis was conducted by Tesoro to determine the associated risk for this project for Rule 1401 compliance since there are some TACs in the gas composition this compressor services. The result of this analysis is contained in Attachment 3 of this evaluation for reference.

RULE EVALUATION

PART 1 SCAQMD REGULATIONS

Rule 212	**Standards for Approving Permits**	**November 14, 1997**
	This project meets all criteria in Rule 212 for permit approval. The new compressor is expected to operate without emitting air contaminants in violation of Division 26 of the State Health & Safety Code or in violation of AQMD rules and regulations. Public notice pursuant to Rule 212 is not required because of the following: 1. 212(c)(1) – The SRP is well beyond 1000 feet from the outer boundary of a school as shown in Attachment 4 (aerial view of facility to nearby school). 2. 212(c)(2) – As shown in Attachment 2, the daily maximum emissions increase of criteria air pollutants is well below the thresholds specified in 212(g). 3. 212(c)(3) – Using the most conservative receptor location of 25 meters, the de minimus increase in TAC emissions from this project is not expected to have any impact on cancer risk, cancer burden and chronic/acute health indices as the Application Screening Index (ASI) for cancer/chronic and acute are 0.56 and 0.06, respectively, which is well below 1.0 pursuant to REG XIV Risk Assessment Procedures, Table L.	

Rule 401	**Visible Emissions**	**November 9, 2001**
	Visible emissions are not expected under normal operating conditions. Compliance is expected.	

Rule 402	**Nuisance**	**May 7, 1976**
	Odor problems and nuisance complaints are not expected under normal operating conditions. Compliance is expected.	

Rule 466	**Pumps and Compressors**	**October 7, 1983**
	Pursuant to Rule 1173(l)(3), the provisions of Rule 466 do not apply because the facility is subjected to Rule 1173.	

Rule 466.1	**Valves and Flanges**	**March 16, 1984**
	Pursuant to Rule 1173(l)(3), the provisions of Rule 466.1 do not apply because the facility is subjected to Rule 1173.	

REG IX	**NSPS**	
Part 60 Subpart GGGa	**Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction or Modification Commenced After November 7, 2006**	**June 2, 2008**
	The SRP is a support facility for the Tesoro Los Angeles Refinery, and thus, is subject to NSPS regulations for petroleum refineries even though the facility is a sulfur recovery plant that is not physically located inside or adjacent to the refinery. Pursuant to §60.590a of this subpart, a compressor and the entire group of equipment within a process unit are 'affected facilities' subject to the requirements of this rule. A process unit is defined as the components assembled and connected by pipes or ducts to process raw materials and to produce intermediate or final products from petroleum, unfinished petroleum derivatives, or other intermediates. A process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the product. This permit unit (P8/S2) is the Vapor Recovery and Fuel Gas Treating System and does not process raw materials nor produce any intermediate or final products from petroleum, unfinished petroleum derivatives or other intermediate. As such, it is not considered a process unit and, therefore, is not subject to the requirements of this rule. Therefore, the miscellaneous fugitive component device (D138) for this permit unit will remain tagged for District Rule 1173 applicability only, with no inclusion of Subpart GGGa under condition H23.1. Rule 1173 applicability and compliance determination are discussed in the REG XI section of this evaluation. The new spare compressor, however, is an "affected facility" under this rule. As a spare unit that is expected to operate in excess of 300 hours per year according to Tesoro, the exemption pursuant to §60.482-1a of this rule cannot be claimed. Therefore, new compressor Dxxx will be tagged with condition H23.x for Subpart GGGa applicability since there is a small increase in ROG emissions from the addition of this new device in the permit unit.	

REG X	**NESHAP**	
Part 63 Subpart CC	**National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries**	**June 23, 2003**
	The SRP is a support facility for the Tesoro Los Angeles refinery, and thus, is subject to the NESHAP regulations for petroleum refineries even though the facility is a sulfur recovery plant that is not physically located inside or adjacent to the refinery. Pursuant to §63.640 of this subpart, this regulation applies to petroleum refining process units and to the following related emission sources that are located at a major source of HAP and has potential to emit or have equipment containing or contacting one or more of the HAPs listed in Table 1 of this subpart: • Storage vessels • Miscellaneous process vents • Wastewater management and treatment equipment • Equipment leak (fugitive) components • Gasoline loading racks • Marine tank vessel loading operations Similar to the NSPS Subpart GGGa, this permit unit (Vapor Recovery and Fuel Gas Treating System) is not a 'petroleum refining process unit' as defined by §63.641 of this subpart because it is not used primarily for: (1) Producing transportation fuels (such as gasoline, diesel fuels, and jet fuels), heating fuels (such as kerosene, fuel gas distillate, and fuel oils), or lubricants; (2) Separating petroleum; or (3) Separating, cracking, reacting, or reforming intermediate petroleum streams. Therefore, the equipment leak standards specified in §63.648 of this subpart are not applicable to the fugitive components within this permit unit. Note that pursuant to §63.640(p)(2) of this subpart, equipment leaks that are also subject to the provisions of 40CFR 60, Subpart GGGa are required to comply only with the provisions specified in Subpart GGGa. As discussed earlier under Subpart GGGa, the new compressor is an affected facility and, therefore, has been tagged with Subpart GGGa via new condition H23.x. Compliance is expected.	

Part 63 Subpart UUU	**National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries; Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units.**	**April 20, 2006**
	The SRP is a support facility for the Tesoro Los Angeles refinery, and thus, is subject to the NESHAP regulations for petroleum refineries even though the facility is a sulfur recovery plant that is not physically located inside or adjacent to the refinery. Unlike other permit units such as Process 3, Systems 1, 2, 3, 4, 5, 6 and 7 at this facility which are tagged with condition S13.4 for Subpart UUU applicability, the Vapor Recovery & Fuel Gas Treating system (P8/S2) is not an 'affected source' as defined in §63.1562 of this subpart. Therefore, the requirements of this rule are not applicable for this permit unit.	

REG XI

Rule 1173	**Control of VOC Leaks and Releases from Components at Petroleum Facilities and Chemical Plants**	**February 6, 2009**
	In addition to new (spare) compressor C-196, other new fugitive components (shown in Attachment 2) will be added to make the physical tie-in to the existing compressor train. Fugitive emissions from the spare compressor and associated new fugitive components are now part of the 'Miscellaneous Fugitive Emissions' device D138 for this permit unit, which is tagged with condition H23.1 for Rule 1173 applicability. The new compressor and fugitive components will be incorporated in the facility's R1173 Inspection & Maintenance (I&M) program to ensure compliance with this rule. Compliance is expected.	

REG XIII	**New Source Review (NSR)**	**December 7, 1995**
	This rule requires the Executive Officer to deny a Permit to Construct for any new, modified or relocated source which results in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia, unless BACT is used. This rule also requires modeling and offset (among other requirements) if there is a net increase in any nonattainment air contaminants for any new or modified source. The definition of "Source" in Rule 1302(ao) is "any permitted individual unit, piece of equipment, article, machine, process, contrivance, or combination thereof, which may emit or control an air contaminant. This includes any permit unit at any non-RECLAIM facility and any device at a RECLAIM facility. The South Coast Air Basin is currently in attainment for NO_2, SO_2, CO and PM10, but nonattainment for ozone and PM2.5. VOC and NO_x are precursors for	

	ozone, while VOC, NO_x, and SO_x are precursors for PM2.5. Therefore, emissions of NO_x, SO_x, PM2.5 and VOC are evaluated for compliance with NSR. As discussed in the Emissions section of this evaluation, the increase of 0.26 lb/day of VOC emissions from this project does not trigger NSR because it is less than 0.42 lb/day. Nonetheless, Tesoro has indicated bellow seal valves will be installed and the increase in VOC emissions is expected to be 0.18 lb/day with BACT.	
1303(a)	**BACT**	**December 6, 2002**
	BACT means the most stringent emission limitation or control technique which: (1) has been achieved in practice; or (2) is contained in any State Implementation Plan; or (3) is any other emission limitation or control technique approved by the EO and cost effective as compared to measures listed in the AQMP. Although this project is not subject to BACT under REG XIII, Tesoro has indicated BACT bellow sealed valves will be used to integrate this spare compressor into the existing compressor train.	
1303(b)(1), 1303(b)(2)	**Modeling** **Offsets**	**December 6, 2002**
	As stated earlier, this project is not subject to the Offset requirements of REG XIII because the emissions increase of non-RECLAIM pollutants is less than 0.42 lb/day.	

REG XIV

Rule 1401	**New Source Review of Toxic Air Contaminants**	**September 10, 2010**
	This rule specifies limits for MICR, cancer burden, and non-cancer acute/chronic hazard index as < 1 in a million, 0.5 and 1.0, respectively, for new permit units, relocations, or modifications to existing permit units which emit toxic air contaminants listed in Table I of this rule. Pursuant to the Risk Assessment Procedures, Version 7.0 and Attachment L for REG XIV, the facility completed a Tier I (Screening Emission Levels) analysis to demonstrate compliance with this rule. As summarized in the Rule 212(c)(3) discussions above, the following Application Screening Indices (ASI), consisting of the cumulative Pollutant Screening Indices shown in Attachment 3, are well below 1.0. $ASI_{cancer\ and/or\ chronic} = \Sigma\ PSI_p =$ **0.563** which is < 1.0 $ASI_{acute} = \Sigma\ PSI_p =$ **0.060** which is < 1.0 Compliance with the above limits for MICR, cancer burden and HIC/HIA are	

	expected and, therefore, rule compliance is also expected.

REG XVII

Rule 1701	**Prevention of Significant Deterioration**	**August 13, 1999**
	The goal of PSD is to ensure that air quality in clean areas does not significantly deteriorate while maintaining a margin for future industrial growth. It applies to net emission increases of criteria air pollutants that are currently in attainment. The District recently signed a new Limited PSD Delegation agreement with EPA (effective July 26, 2007) that gives the District limited responsibility for PSD. The South Coast Air Basin is currently in attainment for NO_2, SO_2, CO, PM10 and lead, but not in-attainment for ozone and PM2.5. Since ROG can be a precursor for PM10, PM2.5 and ozone, the small increase in ROG emissions from this project must be considered for attainment pollutant PM10. Based on a worst case ROG emissions increase of 0.183 lb/day (assumed spare compressor is operating 365 days a year when in reality it is much less), a significant increase, as defined in Rule 1702(s), of PM10 is not expected and the increase should be well below the threshold specified in Rule 1701(b)(2)(A). A recent EPA Endangerment Finding for greenhouse gases (GHG) means that emissions of GHG need to be evaluated under PSD. Note that ambient air quality standards have not yet been released for GHG. Therefore, as the South Coast Air Basin is *not* in *non*attainment, GHG emissions are also subject to PSD in South Coast. There is no increase in GHG emissions as a result of this project. Therefore, the provisions of REG XVII do not apply.	

REG XX RECLAIM

Rule 2005	**New Source Review for RECLAIM**	**May 6, 2005**
	RECLAIM is a market incentive program designed to allow facilities flexibility in achieving emission reduction requirements for NOx and SOx. The SRP is a NOx and SOx Cycle 1 RECLAIM facility. This permit unit and this project do not generate any NOx or SOx emissions and, therefore, not subject to the requirements of this rule.	

REG XXX TITLE V PERMITS

Rule 3002	**Requirements**	**November 14, 1997**
	The SRP has been designated as a Title V facility. The initial Title V permit was issued on October 26, 2009. Per AQMD guidelines for Title V permits, installation of new equipment subject to a NSPS pursuant to 40 CFR Part 60 or a NESHAP pursuant to 40 CFR Part 61 or 63 is considered a significant Title V permit revision. Significant revisions require a 30-day public notice and a 45-day EPA review per District's REG XXX. Since the new spare compressor will be subject to 40CFR Part 60, Subpart GGGa once it's added to the permit unit, issuance of the permit to construct and incorporating the new equipment in Section H of the Facility Permit will constitute a **Significant** Title V permit revision. Therefore, public notice will be issued and a copy of the proposed permit and engineering evaluation will be submitted to EPA for review. Compliance is expected.	

PART 2 STATE REGULATIONS

	California Environmental Quality Act (CEQA)
	CEQA requires that the environmental impact of proposed projects be evaluated and that feasible measures to reduce, avoid or eliminate identified significant adverse impacts be considered. The CEQA Applicability Form (400-CEQA) submitted by the applicant dated June 26, 2013 indicates the project does not have any impacts which would trigger the preparation of a CEQA document. Hence, a CEQA analysis is not required.

CONCLUSION

Based on this evaluation, the modification of the Vapor Recovery & Fuel Gas Treating System (P8/S2) with the addition of an identical spare compressor for C-115 is expected to operate in compliance with all AQMD, State and Federal Rules and Regulations. Therefore, a Permit to Construct (PC) is recommended with the conditions listed on pages 2 - 3 of this evaluation.

The following is a summary of the permit action under this evaluation:

A/N	Equipment Description	Device ID	Recommended Action
555829	Title V Permit Revision	-	Approve
553830	Add new spare compressor, C-196, to P8/S2 of the Title V Facility Permit.	**Dxxx**	Approve PC

Attachment Index

1	**Compliance History**
2	**Fugitive Emissions Data/Calculation**
3	**REG XIV Analysis**
4	**Aerial View of VRS Compressor Train to Nearest School**

Attachment 1

Attachment 2

Attachment 3

Attachment 4

END OF EVALUATION