

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE APPLICATION PROCESSING AND CALCULATIONS	PAGE 1 Appl. Nos.: 510396-97 Processed by: Ngoc Tran Checked by: Date: 10/19/11
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PERMITS TO CHANGE OF CONDITION for:

- 1. HEATER 1F-1, AN 510396**
- 2. HEATER 1F-2, AN 510397**

COMPANY NAME: EXXONMOBIL OIL CORP.
COMPANY ID: 800089
MAILING ADDRESS: 3700 W. 190th St.
 Torrance, CA 90509-2929
EQUIPMENT LOCATION: Same as above

I. EQUIPMENT DESCRIPTION: SECTION D

Equipment	ID No.	Connected To	RECLAIM	Emissions* And Requirements	Conditions
Process 1: CRUDE DISTILLATION UNIT					P13.1
System 6: CRUDE HEATING SYSTEM					
HEATER, ATMOSPHERIC DISTILLATION COLUMN CHARGE, 1F-1, NATURAL GAS, REFINERY GAS, WITH LOW NOX BURNER, 457 MMBTU/HR WITH A/N: 442858-510396 BURNER, NATURAL GAS, REFINERY GAS, WITH LOW NOX BURNER, 60 TOTAL; 457 MMBTU/HR	D913	<u>Sx1</u> , C916	NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B61.3, D90.12, D328.1, E193.16, <u>E448.x3</u> ; H23.13, K171.10,
<u>STACK, EAST & WEST, HEATER 1F-1 BYPASS STACKS, NORMALLY CLOSED, EQUIPPED WITH STACK DAMPER POSITION MONITOR, LOCATED UPSTREAM OF NH3 INJECTION GRIDS & SCR, 2 TOTAL</u> A/N: 510396	<u>Sx1</u>	<u>D913</u>			<u>E448.x3</u>
HEATER, VACUUM DISTILLATION COLUMN CHARGE, 1F-2, NATURAL GAS, REFINERY GAS, WITH LOW NOX BURNER, 161 MMBTU/HR WITH A/N: 455466-510397 BURNER, NATURAL GAS, REFINERY GAS, WITH LOW NOX BURNER, 40 TOTAL; 161 MMBTU/HR	D914	<u>Sx2</u> , C916	NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B61.3, D90.12, D328.1, E193.16, <u>E448.x3</u> ; H23.13,
<u>STACK, EAST & WEST, HEATER 1F-2 BYPASS STACKS, NORMALLY</u>	<u>Sx2</u>	<u>D914</u>			<u>E448.x3</u>

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<u>CLOSED, EQUIPPED WITH STACK DAMPER POSITION MONITOR, LOCATED UPSTREAM OF NH3 INJECTION GRIDS & SCR, 2 TOTAL</u> A/N: 510397					
SELECTIVE CATALYTIC REDUCTION, WITH FIXED BED REACTOR AND HONEYCOMD BLUE CATALYST BED WITH AMMONIA INJECTION A/N: 258222	C916	D913 D914 S1731		NH3: 20 PPMV (4) [RULE 1303(a)(1)-BACT, 5-10-1996]	D12.2, D12.8, D28.11, E71.7
STACK, MAIN STACK, COMMON TO HEATERS 1F-1 & 1F-2 A/N: 455466-510397	S1731	C916			
FUGITIVE EMISSIONS, MISCELLANEOUS A/N: 455466-510397	D1789			HAP: (10) [40CFR 63 Subpart CC, #5A, 6-23-2003]	H23.34

II.BACKGROUND:

The permitting history of the combustion equipment served the crude units is as follows:

Heater 1F-1, atmospheric unit	Heater 1F-2, vacuum unit
<p><u>07/29/92:</u> PC AN 258224 issued to modify the heater by venting to the SCR (common with 1F-2) to comply with R1109 requirements.</p>	<p>04/17/88: PO D03616 (AN 145244) issued with 143 MMBtu/hr, 40 John Zink (Model PSFC-12-M) Low-NOx combined gas/oil burners.</p> <p><u>05/22/90:</u> PC AN 225032 issued to add 140 secondary burners (Model B-BU-S55940-602-2) to the existing 40 burners without firing rate indications. AN 225032 was cancelled on 11/30/92, for subsequent modification AN 258223.</p> <p><u>07/29/92:</u> PC AN 258223 issued to modify the heater by venting to the SCR (common with 1F-1) to comply with R1109 requirements. PC condition limits 143 MMBtu/hr. R1109 approved plan dated 11/23/88, indicated the maximum firing rate of 143 MMBtu/hr. AN 258223 was cancelled on 07/29/93 for subsequent change of condition AN 278855.</p>

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<p><u>7/28/95</u>: PO D92645 (AN 269210) issued to upgrade the furnace by adding 20 radiant section tubes and 16 fume gas tips.</p> <p><u>08/01/95</u>: PO D92510 (AN 278854) issued to change of startup/shutdown condition to include 1) bypass SCR at temperature lower than 550⁰F and 2) 144 hours maximum.</p> <p><u>10/18/06</u>: PO F84701 (AN 442858) issued to this heater by removing the fume gas knockout pot 1C-9 venting the fume gas from foul water oxidation unit to this heater.</p> <p><u>10/18/06</u>: F84703 (AN 455998) issued for LPG MEROX treating unit (P11S1) to remove the venting from Vessels 9C-8 (D585) & 9C-13 (D594) with associated fume gas knockout pot 1D-7 to this heater. Fuel gas “C3/C4” was removed from the equipment description.</p>	<p><u>07/31/95</u>: PO D92480 (AN 278855) issued to change of startup/shutdown condition to include 1) bypass SCR at temperature lower than 550⁰F and 2) 144 hours maximum. PC condition limits 161 MMBtu/hr & calculations was based on 161 MMBtu/hr firing rate.</p> <p><u>7/18/06</u>: PO F83209 (AN 433581) issued to change the heating rate of the burners from 143 to 161 MMBtu/hr as admin type (Current FP shows 161 MMBtu/hr on heater and 143 MMBtu/hr on burners).</p> <p><u>04/18/08</u>: PO F95366 (AN 455166) issued to change of conditions as to tag Subpart J of 40CFR60 per EPA CD – Conditions B61.3, D90.12, E193.16 & H23.13.</p>
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Pending applications

04/30/10: ANs 510396 & 510397 were submitted for Heater 1F-1 and 1F-2, respectively, per District’s requirement to address the bypass stack monitoring condition (**Attachment 1**).

07/09/10: Draft equipment description and Condition E448.x3 for NOx monitoring sent to EM for review and comment. Correspondences have been taking place until 12/22/10.

10/06/11: Final Condition E448.x3 for NOx and SOx monitoring, covering planned and unplanned bypass, received from management to impose this condition in the TV/FP. EM’s request of burning the natural gas only during such bypass to avoid SOx monitoring will not be accepted (**Attachments 2A, 10/06/11 emails & 2B, emails 10/19/11**). This evaluation, therefore, is to include a condition (E448.x3) which has been pre-approved by the District’s RECLAIM team’s manager Danny Luong.

III. ENFORCEMENT RECORD REVIEW:

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There was an NOV (#P45645) issued on 8/12/08, by the district to EM for violation of R2012(c)(2)(A) as operating the crude unit heater (Heater 1F-2) without continuously monitor the emissions ([Attachment 3](#)).

IV. PROCESS DESCRIPTION:

Crude Unit Heating System:

Heater 1F-1 was installed to heat up the crude oil stream entering the atmospheric distillation column. Heater 1F-2 was installed to heat up the residue stream, leaving the bottom of the atmospheric distillation column, prior to entering the vacuum distillation column. Originally, each heater was equipped with two stacks (East and West).

Prior to 1992, the combustion emissions from both heaters were not controlled and were released directly to the atmosphere through their separate stacks (two stacks for each heater). In 1992, in order to comply with NOx emissions reductions required by R1109, a common SCR and associate stack (main stack) were installed serving both heaters as well as an air-preheater located downstream of the SCR. The four existing stacks were closed by dampers, but not demolished. The schematic of the two heaters and five stacks is shown in [Attachment 4](#). Without NOx being controlled by SCR as well as NOx monitoring, EM occasionally [in the past utilized](#) these four bypass stacks to vent heaters' emissions directly to the atmosphere (e.g., planned and unplanned start up, shutdown, maintenance, etc.)

Condition E448.x3 will be imposed through this evaluation to address the notification, monitoring, recording, and recordkeeping requirements for NOx and SOx whenever flue gas is vented through the bypass stack(s) for planned and unplanned events. This condition was drafted by staff and discussed with EM since 07/09/10, to address uncontrolled NOx emissions monitoring. It was finalized by District management on 10/06/11 (Email dated 10/06/11, [Attachment 2A](#)) to address both NOx and SOx emissions monitoring requirements.

The management's email dated 10/06/11 ([Attachment 2A](#)) also determined, "*We will be responding to ExxonMobil's request to use natural gas during use of bypass for the crude heaters (the answer will be no).*" Such "no" is clarified in a later email dated 10/19/11 ([Attachment 2B](#)) as eliminating the SOx monitoring is not allowed. The heaters currently combust the refinery fuel from the central fuel gas mix drum (Vessel 64C-4).

There is no clarification for the unplanned events. This Condition E448.x3, therefore, is considered a pre-approved permit condition by the District' RECLAIM team manager. Since the condition addresses the monitoring of the stacks' dampers position, it's tagged to the heaters devices and the bypass stacks' devices.

As per the P&ID 01A0116D04 dated 02/07/08 ([Attachment 5](#)), fume gas from KO pots 1C-9 and 1D-7 are no longer routed to Heater 1F-1. This P&ID was submitted to comply with the existing Condition K171.10 as part of EPA's comments during the processing of the Title V

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permit. Through this evaluation, K171.10 condition will be removed from Heater 1F-1 (Device D913). (Note that the firing rate is not included in the P&ID).

K171.10 The operator shall provide to the District the following items:

Update P&ID drawings of the heater, including the firing rate in MMBtu/hr, fuel gas/utility system, removal of all miscellaneous process gases (fume/waste gas) feed lines and their knockout pots (e.g., Vessels 1C-9 & 1D-7), shall be submitted to the district within 60 days after permit issuance date ExxonMobil shall maintain records demonstrating the non-operation status of the above equipment and shall submit to the district upon request

[RULE 2011, 5-6-2005; 40CFR 60 Subpart J, 6-24-2008]

[Devices subject to this condition: D913]

Anhydrous NH₃ is injected in the SCR system when the flue gas inlet temperature is at least 550 degrees F (Condition E71.7) with BACT limit at 20 ppmv. Yearly source test condition D28.11 is currently imposed in the FP for monitoring the NH₃ slippage.

V. EMISSIONS CALCULATIONS:

The maximum firing rate of Heaters 1F-1 and 1F-2 are 457 and 161 MMBtu/hr, respectively, and will not be changed from these change of conditions applications. During the SCR bypass, the uncontrolled NO_x emissions can be five time higher than controlled NO_x (assuming 80% control efficiency). For the startup and shutdown periods, during which time the SCR will be bypassed, the fuel usage will be lower than the normal operating level, resulting in less uncontrolled NO_x emissions venting to the atmosphere. Additionally, there are no changes to the operations of the heaters as startup and shutdown are not new activities to the heaters. Condition E448.x3 is imposed to comply with RECLAIM monitoring requirements when the heaters need to vent through the bypass stacks.

Condition E448.x3 is applied for non-normal operating conditions of the heaters and therefore, imposing it in the permit will not change the baseline emissions of the heaters.

VI. RULE EVALUATIONS:

Rule 212: R212(c)(1):

The equipment is not located within 1000 feet from the boundary of a school. Therefore, public notice required under R212(c)(1) does not apply.

R212(c)(2):

The addition of NO_x and SO_x monitoring Condition E448.x3 does not result in an emission increase exceeding any of the daily limits specified under R212(g) under normal operating conditions. Therefore, public notice required under R212(c)(2) does not apply.

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R212(c)(3):

The addition of NO_x and SO_x monitoring Condition E448.x3 does not result in the toxic emission increase under normal operating conditions. Therefore, public notice required under R212(c)(3) does not apply.

R212(g):

The addition of NO_x and SO_x monitoring Condition E448.x3 does not result in an emission increase exceeding any of the daily limits specified under R212(g) under normal operating conditions. Therefore, public notice required under R212(g) does not apply.

- Rule 401: With proper operation and maintenance of the heaters, opacity is not expected.
- Rule 402: With proper operation and maintenance of the heaters, nuisance is not expected.
- Rule 407: Compliance with R407 limit for CO at 2000 ppmv is expected under normal operating condition.
- R409: Compliance with R409 limit of PM at 0.1 gr/scf is expected under normal operating condition.

Regulation IX – New Source Performance Standards (NSPS):

40CFR60 Subparts A & J – Fuel gas combustion device: Under the Consent Decree (CD) ordered by the EPA on 12/13/06, Heaters 1F-1 and 1F-2 be subject to 40CFR60 Subpart A & J requirements as follows:

Equip	Subpart, Section	Requirements	Compliance/ Conditions
Heater 1F-1, D913 & 1F-2, D914	A J, 60.104(a)(1) J, 60.105(a)(3) J, 60.105(a)(4)	General provisions Limit 160 ppm H ₂ S content in fuel gas Monitoring of SO _x at stack, or H ₂ S content in fuel gas	E193.16 B61.3, H23.13 D90.12

Conditions listed in table above were included in the evaluation of the desalter project.

Regulation XIII – New Source Review (NSR):

This change of condition does not result in an emission increase of any nonattainment air contaminant, any ozone depleting compound, or ammonia under normal operating conditions. Therefore, Reg XIII does not apply.

- Rule 1401: Since the emission level of toxic H₂S is not increased under the normal operating conditions, Rule 1401 does not apply.

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Reg XVII – PSD:

This change of condition does not result in an emission increase of any attainment air contaminants (NOx, SOx, CO, or lead) in the South Coast Air Basin under normal operating conditions. Therefore, Reg XVII does not apply.

R2011: These two heaters are subject to R2011 as SOx major sources. To comply with monitoring requirements of this rule, EM installed SOx CEMS at the common main stack after the SCR for SOx monitoring during normal operating conditions.

The four bypass stacks are closed by the dampers. Condition E448.x3 will be imposed requesting notification, SOx monitoring, recording, and reporting during the bypass stacks utilization.

R2012: These two heaters are subject to R2012 as major source. CEMS for NOx was installed at the common main stack after the SCR for NOx monitoring during normal operating conditions.

The four bypass stacks are closed by the dampers. Condition E448.x3 will be imposed requesting notification, NOx monitoring, recording, and reporting whenever the bypass stacks are utilized.

Reg XXX - Title V Permits:

R3005 – “Permit Revision”:

The initial Title V permit was issued to EM and in effect beginning January 25, 2010. The proposed addition of Condition E448.x3 is treated as Minor Title V revision pursuant to R3005(e). The permit revision does not require public notification under R3006(b), but requires a 45-day review by EPA.

VII. CONCLUSION AND RECOMMENDATION

The two crude heaters are expected to comply with all applicable AQMD and federal Rules and Regulations. Permits to operate are recommended subject to the addition of Condition E448.x3 to both heaters and removal of Condition K171.10 from Heater 1F-1:

PROCESS CONDITIONS

P13.1 All devices under this process are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
HAPs	40CFR61, SUBPART	FF
[40CFR 61 Subpart FF, 12-4-2003]		

[Processes subject to this condition: 1, 2, 3, 4, 5, 7, 8, 9, 11, 12, 13, 14, 15, 20, 22, 23]

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DEVICE CONDITIONS

B61.3 The operator shall not use fuel gas containing the following specified compounds:

Compound	ppm by volume
H2S greater than	160

[40CFR 60 Subpart J, 06-24-2008]; Consent Decree Civil Case No. C 5809, 12-13-2005]

[Devices subject to this condition : D83, D84, D85, D120, C164, D231, D232, D234, D235, D367, D833, D913, D914, D917, D918, D920, D925, D927, D928, D929, D930, D931, D949, D950, D1403]

D12.2 The operator shall install and maintain a(n) pressure gauge to accurately indicate the differential pressure across the SCR bed.

[RULE 2005, 5-6-2005]

[Devices subject to this condition : C233, C236, C301, C395, C916, C923, C1238, C1241]

D12.8 The operator shall install and maintain a(n) temperature reading device to accurately indicate the temperature at the SCR inlet.

[RULE 2005, 5-6-2005]

[Devices subject to this condition: C233, C236, C301, C395, C916, C923, C1238, C1241]

D28.11 The operator shall conduct source test(s) in accordance with the following specifications:

The test shall be conducted annually to determine the NH3 emission.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C233, C236, C301, C395, C916, C1238, C1241]

D90.12 The operator shall continuously monitor the H2S concentration in the fuel gases before being burned in this device according to the following specifications:

The operator shall monitor the H2S concentration at the outlet of the fuel gas mix drum 64C-4 (Device D838) for fuel combustion devices.

The operator shall use Gas Chromatography (GC 34) meeting the requirements of 40CFR60 Subpart J, Method 11 to monitor the parameter.

The operator shall also install and maintain a device to continuously record the parameter being monitored.

[40CFR 60 Subpart J, 6-24-2008; CONSENT DECREE CIVIL CASE No. 05 C 5809, 12-13-2005]

[Devices subject to this condition : D83, D84, D85, D120, C164, D231, D232, D234, D235, D367, D833, D913, D914, D917, D918, D920, D927, D928, D929, D930, D931, D949, D950, D1403]

D328.1 The operator shall determine compliance with the CO emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100.1 or 10.1; or (b) conducting a test at least annually

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using a portable analyzer and AQMD-approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with the emission limits. The operator shall comply with all general testing, reporting, and recordkeeping requirements in Sections E and K of this permit.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 407, 4-2-1982]

[Devices subject to this condition : D83, D84, D85, D120, D231, D232, D234, D235, D269, C626, D803, D805, D833, D913, D914, D917, D918, D920, D922, D924, D927, D928, D929, D930, D931, D949, D950, D1236, D1239, D1403]

E71.7 The operator shall only inject NH₃ into this equipment if the flue gas inlet temperature is at least 550 degrees F.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C301, C395, C916, C923, C1238, C1241]

E193.16 The operator shall operate and maintain this equipment according to the following specifications:

The operator shall comply with all applicable requirements specified in Subpart A of the 40CFR60

[40CFR 60 Subpart A, 5-16-2007; CONSENT DECREE CIVIL CASE No. 05 C 5809, 12-13-2005]

E448.x3 The operator shall comply with the following requirements:

The operator shall maintain the SCR bypass stack dampers for heaters 1F-1 and 1F-2 (Device IDs D913 and D914) at a fully closed position such that no emissions will be exhausted through the bypass stacks whenever fuel is supplied to the heaters, unless a contractor, who is certified under the Laboratory Approval Program (LAP), is continuously monitoring NO_x and SO_x emissions from the bypass stack(s) using a District-approved test method.

The operator shall install and maintain damper limit switches or other equivalent device to accurately indicate the fully closed position of the SCR bypass stack dampers.

The operator shall record the position of the dampers at least once every 15 minutes and any time the damper position changes.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with the requirements specified in this condition.

The District shall be notified of the date and time of each opening of any bypass stack damper(s) for heater 1F-1 or 1F-2 at least 24 hours prior to opening for a planned event or no more than one hour after opening for an unplanned event.

The District shall be notified of the date, time, and duration of each instance of the opening of any bypass stack dampers for heater 1F-1 or 1F-2 and of the uncontrolled emissions resulting from the event within 24 hours of closing the damper(s).

[RULE 2011, 2012, 5-6-2005]

[Devices subject to this condition: D913, D914, Sx1, Sx2]

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H23.13 This equipment is subject to the applicable requirements of the following rules or regulations:

<u>Contaminant</u>	<u>Rule</u>	<u>Rule Rule/Subpart</u>
H2S	40CFR60, SUBPART	J

[40CFR 60 Subpart J, 6-24-2008; CONSENT DECREE CIVIL CASE No. 05 C 5809, 12-13-2005]

[Devices subject to this condition : D83, D84, D85, D120, C164, D231, D232, D234, D235, D269, D367, C626, C686, C687, D803, D805, D833, C891, C892, C894, D913, D914, D917, D918, D920, D922, D924, D927, D928, D929, D930, D931, D949, D950, C952, D1236, D1239, D1403, C1558]

H23.34 This equipment is subject to the applicable requirements of the following rules or regulations:

<u>Contaminant</u>	<u>Rule</u>	<u>Rule/Subpart</u>
VOC	District Rule	1173
VOC	40CFR60, SUBPART	GGGa

~~K171.10 The operator shall provide to the District the following items:~~

Update P&ID drawings of the heater, including the firing rate in MMBtu/hr, fuel gas/utility system, removal of all miscellaneous process gases (fume/waste gas) feed lines and their knockout pots (e.g., Vessels 1C-9 & 1D-7), shall be submitted to the district within 60 days after permit issuance date

ExxonMobil shall maintain records demonstrating the non-operation status of the above equipment and shall submit to the district upon request

[RULE 2011, 5-6-2005; 40CFR 60 Subpart J, 6-24-2008]

[Devices subject to this condition : D913]