

Date TBD

Mr. Alan Seese  
 BP West Coast Products, LLC, Carson Refinery  
 2350 E 223<sup>rd</sup> St  
 Carson, CA 90749

SUBJECT: A/N 448588- 40CFR63 Subpart UUU Operation, Maintenance and Monitoring Plan for FCCU

Dear Mr. Seese:

The South Coast Air Quality Management District has reviewed your 40CFR63 Subpart UUU Operation, Maintenance and Monitoring Plan (OMMP) dated September 8, 2005 for your FCC. This plan includes information regarding emission limits, monitoring equipment, procedures, equipment maintenance, and quality control plans as detailed in §63.1574(f). A summary of the required information is provided below:

	Requirements for Emissions of Metal HAPs (PM as surrogate)	Requirements for Emissions of Metal HAPs (Opacity as surrogate)	Requirements for Emissions of Organic HAPs (CO as surrogate)
Compliance option	Elect NSPS	Elect NSPS	Elect NSPS
Parameters to be monitored	Coke burn-off rate (calculated per Equation 1 in 63.1564(b)(4)(i) using exhaust flow, CO%, CO <sub>2</sub> % and O <sub>2</sub> % data from process monitors)	Opacity using COMS	CO concentration using CO CEMS
Emission limits	Coke burn-off rate: <1 lb PM/1000 lbs coke burn-off	Opacity <30% (except one 6-min avg per hour can exceed)	CO <500 ppmv, dry basis
Operating parameter limit	Not applicable	Not applicable	Not applicable
Monitoring procedure (emissions/operating parameters)	Determining and recording each day the average coke burn-off rate (thousands of kilograms per hour) using Equation 1 in §63.1564 and the hours of operation for each catalyst regenerator; maintaining PM emission rate	Collecting the continuous opacity monitoring data for each catalyst regenerator vent according to §63.1572; and maintaining each 6-minute average at or below 30 percent except that one 6-	Collecting the hourly average CO monitoring data according to §63.1572; and maintaining the hourly average CO concentration at or below 500 ppmv (dry

	Requirements for Emissions of Metal HAPs (PM as surrogate)	Requirements for Emissions of Metal HAPs (Opacity as surrogate)	Requirements for Emissions of Organic HAPs (CO as surrogate)
	below 1.0 kg/1,000 kg (1.0 lb/1,000 lbs) of coke burn-off	minute average during a 1-hour period can exceed 30 percent	basis)
Monitoring schedule	Continuously when FCCU is in operation	Continuously when FCCU is in operation	Continuously when FCCU is in operation
QA/QC	Specified by the manufacturer	Per Performance Specification 1 [40CFR60 Appendix B], Procedure 1[40CFR60 Appendix F]	Per Performance Specification 4 [40CFR60 Appendix B], Procedure 1[40CFR60 Appendix F]
Maintenance schedule for monitoring systems	Per manufacturer recommendation	Per manufacturer recommendation	Per manufacturer recommendation
Bypass lines	None	None	None

Based on the information submitted, your FCCU 40CFR63 Subpart UUU OMMP has been reviewed and approved, subject to the following conditions.

1. Operate at all times according to the procedures in your OMMP.
2. Maintain records to document conformance with the procedures in your OMMP.
3. Submit changes to this OMMP for approval by the Executive Officer [§63.1574(f)(1)].

If you have any questions, regarding this plan, please contact Ms. Janice West at 909-396-3763.

Sincerely,

Jay Chen  
Senior Manager  
Refinery and Waste Management  
Engineering & Compliance

JC:JW

cc: Ed Pupka