

Date TBD

Ms. Royann Winchester  
 Tesoro Refining and Marketing Company  
 2101 E. Pacific Coast Hwy  
 Wilmington, CA 90744

SUBJECT: A/N 474591- 40CFR63 Subpart UUU Operation, Maintenance and Monitoring Plan for CRUs

Dear Ms. Winchester:

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 CRUs. 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:

	<b>Requirements for Emissions of Organic HAP</b> ( <i>Total Organic Carbon as surrogate</i> ) During degassing step of catalyst regeneration	<b>Requirements for Emissions of Inorganic HAP</b> ( <i>HCl as surrogate</i> ) During coke burn-off and catalyst rejuvenation steps of catalyst regeneration
Compliance option	Vent emissions to a flare that meets the 63.11(b) control device requirements, with visible emissions $\leq 5$ min per 2-hour operating period	Reduce uncontrolled emissions of HCl from internal scrubber vents to a concentration of 30 ppmv (dry basis, 3% O <sub>2</sub> )
Parameters to be monitored	Continuous presence of pilot flame, visible emissions	Daily average HCl concentration in catalyst regenerator exhaust gas
Emission limits	Visible emissions $\leq 5$ min per 2-hour operating period from flare	30 ppmv HCl (dry basis, 3% O <sub>2</sub> ) at internal scrubber vent
Operating Parameter Limit	Flare pilot light present at all times and flare operating at all times emissions may be vented to it.	Concentration of 30 ppmv (dry basis, 3% O <sub>2</sub> )
Monitoring Procedure	Collect flare monitoring data according to 63.1572, and record for each 1-hour period whether monitor was continuously operating and the pilot light was continuously present during each 1-hour period. Monitor visible emissions.	Measure and record HCl concentration at least 4 times during a regeneration cycle or every 4 hours, using a colorimetric tube sampling system; calculating the daily average HCl concentration for that day (or burn-off period if less than 24 hours), and maintaining the daily average below the applicable operating limit.
Monitoring Schedule	Continuously when emissions may be vented (during depressurization step of catalyst regeneration)	Continuously when emissions may be vented (during coke burn-off and catalyst rejuvenation steps of catalyst regeneration)

	<b>Requirements for Emissions of Organic HAP</b> ( <i>Total Organic Carbon as surrogate</i> ) During degassing step of catalyst regeneration	<b>Requirements for Emissions of Inorganic HAP</b> ( <i>HCl as surrogate</i> ) During coke burn-off and catalyst rejuvenation steps of catalyst regeneration
QA/QC	Specified by the manufacturer	Specified by the manufacturer
Maintenance Schedule	Preventive maintenance conducted prior to regeneration; per manufacturer recommendation	Preventive maintenance conducted prior to regeneration; per manufacturer recommendation
Bypass lines	None	None

Based on the information submitted, your CRU 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