



# South Coast Air Quality Management District

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July 1, 2011  
via electronic submittal

Mr. Gerardo Rios  
Chief, Permits Office  
U.S. EPA, Region IX, Mail Stop AIR-3  
75 Hawthorne St.  
San Francisco, CA 94105

Subject: Proposed De Minimis Significant Revision to Title V Facility Permit for BP West Coast Products LLC., Carson Refinery (Facility ID #131003)

Dear Gerardo:

Enclosed for your 45-day review is the proposed revision to the Title V facility permit for BP West Coast Products LLC (BP) located at 2350 E. 223<sup>rd</sup> Street, Carson, California. The proposed revision is a De Minimis Significant Revision and a public notice is not required.

The South Coast Air Quality Management District (AQMD) has received applications for Permits to Construct from BP for the equipment described in tables below. The AQMD has evaluated the applications and has made a preliminary determination that the equipment will operate in compliance with all of the applicable requirements of our Rules and Regulations. The revised portions of the permit and our evaluation reports are attached for your review.

## Section H (Permit-to-Construct) - De Minimis Significant Revision

Application No.	Equipment	Application(s) for
504559	No. 1 Catalytic Reformer Unit	Modification of the No. 1 Catalytic Reformer Unit consisting of tie-in of an existing lube oil reservoir, storing lube/seal oil used in a compressor, to the Refinery Vapor Recovery System.
504560	No. 2 Catalytic Reformer Unit	Modification of the No. 2 Catalytic Reformer Unit consisting of tie-in of an existing lube oil reservoir, storing lube/seal oil used in a compressor, to the Refinery Vapor Recovery System.
506084	Refinery Vapor Recovery System	Modification of the Refinery Vapor Recovery System to receive vent gas from connection of lube oil storage tanks in the Nos. 1 and 2 Catalytic Reformer Units.
515390	Superfractionation Unit	Modification to existing superfractionation unit by upgrading two atmospheric pressure relief valves on two feed surge drums with pressure relief valves which will be connected to the South Area flare

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Application No.	Equipment	Application(s) for
515465	South Area Flare System	Modification to existing flare to allow new ties-in from the Superfractionation Unit

The proposed revision to Section H includes additional changes to Condition S56.1. As shown in the draft permits, the reference to paragraph (c)(4) of Rule 1118 has been changed to paragraph (c)(3) in two places in the condition along with a clarifying edit. We have determined that the reference to (c)(3) is more appropriate for these two requirements than (c)(4).

This letter is being sent to you via email in order to facilitate your review. If you have any questions or wish to provide comments regarding this project, please contact the processing engineers, Mr. Rafik Beshai, at (909) 396-3611 or by email at [rbeshai@aqmd.gov](mailto:rbeshai@aqmd.gov), or Ms. Hanh Le, at (909) 396-2522 or by email at [hle@aqmd.gov](mailto:hle@aqmd.gov).

Sincerely,



Jay Chen  
Senior Engineering Manager  
Refinery, Waste Management and Terminal Permitting  
Engineering and Compliance

Enclosures

cc w/o enclosures: Eric Daley, Environmental Planning Supervisor (BP)