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	PROCESSED BY Jon Uhl	CHECKED BY CAT

PERMIT TO CONSTRUCT (modification)

COMPANY NAME, LOCATION ADDRESS:

DeMenno/Kerdoon, Inc., SCAQMD ID # 800037
2000 North Alameda Street
Compton, CA 90222

EQUIPMENT DESCRIPTION:

New Permit to Construct for equipment modifications to the existing Caustic Scrubber – Process Waste Gas (Process 9: System 3). Equipment added in **boldface**; Equipment removed in **strikeout**:

Section H of DeMenno/Kerdoon Facility Permit, ID# 800037

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 9: AIR POLLUTION CONTROL					
System 3: CAUSTIC SCRUBBER VAPOR RECOVERY SYSTEM – PROCESS WASTE GAS					S15.2, S18.2
KNOCK OUT POT, KO-708, HEIGHT: 7 FT; DIAMETER: 4 FT A/N: 551690	D559	D128			K171.1
KNOCK OUT POT, KO-709, HEIGHT: 7 FT; DIAMETER: 4 FT A/N: 551690	D560	D128			K171.1
PUMP, KO POT 708/709 DRAIN, P-xxx, 5 HP A/N: 551690	D561				K171.1
KNOCK OUT POT, KO-703, HEIGHT: 7 FT 4 IN; DIAMETER: 1 FT 10 IN A/N: 514876 551690	D295	D128			
KNOCK OUT POT, KO-700, HEIGHT: 7 FT 4 IN; DIAMETER: 2 FT A/N: 514876 551690	D294	D128			
PUMP, KO POT 700/703 DRAIN, P-708, 5 HP A/N: 514876 551690	D250				
SCRUBBER, D-601, HEIGHT: 29 FT; DIAMETER: 2 FT A/N: 514876	C137				C8.1, C8.8, K67.19
SCRUBBER, D-602, SPARE, HEIGHT: 29 FT; DIAMETER: 2 FT A/N: 514876	C138				C8.1, C8.8, K67.19



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Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
DRUM, CAUSTIC, D-606, LENGTH: 16 FT; DIAMETER: 8 FT A/N: 514876	D248				
PUMP, NORTH CAUSTIC CIRCULATION, P-704A, 5 HP A/N: 514876	D251				
PUMP, MIDDLE CAUSTIC CIRCULATION, P-704B, 3 HP A/N: 514876	D282				
PUMP, SOUTH CAUSTIC CIRCULATION, P-704C, 5 HP A/N: 514876	D325				
DRUM, WASH WATER, D-607, LENGTH: 11 FT; DIAMETER: 3 FT 6-IN A/N: 514876	D249				
PUMP, SOUTH HOT WATER WASH FOR SCRUBBER, P-705, 5 HP A/N: 514876	D252				
KNOCK-OUT POT, KO-701, HEIGHT: 13 FT; DIAMETER: 3 FT A/N: 514876	D290				
PUMP, KO-TANK DRAIN, P-706, 5 HP A/N: 514876	D253				
KNOCK OUT POT, KO-702, HEIGHT: 13 FT; DIAMETER: 4 FT 2 IN A/N: 514876 551690	D141	C281			
PUMP, KO-702 DRAIN, P-711, 5 HP A/N: 514876 551690	D254				
KNOCK OUT POT, KO-704, HEIGHT: 5 FT 6 IN; DIAMETER: 2 FT 2 IN A/N: 514876 551690	D241	C142			
KNOCK OUT POT, KO-705, HEIGHT: 6 FT 6 IN; DIAMETER: 3 FT A/N: 514876 551690	D226	C142			

Device C142 = Process 9: System 7 -- Afterburner

Device C281 = Process 9: System 13 -- Afterburner

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F2.1 The operator shall limit emissions from this facility as follows:

Contaminant	Emissions Limit
VOC	Less than 2550 LBS IN ANY ONE MONTH

The facility afterburners stacks and facility fugitive components shall comply with the above Volatile Organic Compounds (VOC) emission limit.

To ensure compliance with the monthly Volatile Organic Compounds (VOC) emission limit of this condition, the operator shall comply with the following recordkeeping requirements:

(1) Within 14 calendar days after the end of each month, the operator shall total and record VOC emissions for the month from afterburners and fugitive components.

(2) The operator shall retain the VOC emissions records for at least 5 years.

RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002

F16.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Records of the monthly (and quarterly where applicable) inspections, and subsequent repair and reinspection of VOC fugitive components subject to District 1173.

RULE 1173, 5-13-1994; RULE 1173, 2-6-2009

S15.2 The vent gases from all affected devices of this process/system shall be vented as follows:

All vent gases from this system shall be vented to the Afterburners (Process 9, Systems 7, 13).

This process/system shall not be operated unless at least one of the afterburners is in full use and has a valid permit to receive 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 9, System 1, 2, 3, 4, 5, 8, 9, 11, 12, Process 11, System 4]

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S18.2 All affected devices listed under this process/system shall be used only to receive, recover and/or dispose of vent gases routed from the system(s) or process(es) listed below, in addition to specific devices identified in the "connected to" column:

Used Oil Dehydration (Process: 1, System: 1)

Vacuum Distillation Unit No. 1 (Process: 1, System: 2)

Vacuum Distillation Unit No. 2 (Process: 1, System: 3)

PRM Stripper (Process: 2, System: 1)

Naphtha Splitter Unit (Process: 3, System: 1)

Ethylene Glycol Distillation (Process: 4, System: 1)

Waste Water Treatment (Process: 5, System: 1)

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 9, System 3]

~~C8.1 The operator shall use this equipment in such a manner that the pH being monitored, as indicated below, is not less than 10 of the pH scale.~~

~~The operator shall monitor and record the pH of the scrubbing solution at least twice per day.~~

~~The operator shall calibrate the instrument used to measure the pH per the manufacturer's specifications.~~

~~**RULE 204, 10-8-1993**~~
~~**RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997**~~
~~[Devices subject to this condition: C137, C138]~~

C8.8 The operator shall use this equipment in such a manner that the flow rate being monitored, as indicated below, is not less than 40 gpm.

To comply with this condition, the operator shall install and maintain a(n) flow meter to accurately indicate the flow rate of the recirculating caustic solution.

The flow rate measured shall be the scrubber re-circulation flow rate.

The operator shall monitor and record the re-circulation flow rate of the caustic solution at least twice per day.

The operator shall calibrate the flow meter per the manufacturer's specifications.

RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002
RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997
 [Devices subject to this condition: C137, C138, C139]



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K67.19 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

pH of the scrubbing solution.

Re-circulation flow rate, in gpm, of the scrubbing solution.

RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997;

[Devices subject to this condition: C137, C138, C139]

K171.1 The operator shall provide to the District the following items:

Final drawings and/or specifications of the equipment installed/constructed/modified, including but not limited to PFD, P&ID and revisions/updates, shall be submitted to the SCAQMD within 60 days after completion of the project.

RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002;

[Devices subject to this condition: C142, C281, C300, C301, D554, D555, D556, D559, D560, D561]

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 1: DISTILLATION					
System 1: USED OIL DEHYDRATION					S15.1
ACCUMULATOR, PHASE SEPARATOR, D-204, LENGTH: 20 FT ; DIAMETER: 5 FT A/N: 513069 553508	D128	D9 D31 D121 D176 D177 D260 D266 D267 D294 D295 D361 D373 D380 D383 D385 D394 D395 D417 D559 D560			

S15.1 The vent gases from all affected devices of this process/system shall be vented as follows:

All vent gases from any process vent of this system shall be vented to the ~~eaustic scrubber(s)~~
Vapor Recovery System - Process Waste Gas (Process 9, System 3).

This process/system shall not be operated unless the above ~~scrubber(s)~~ **are vapor recovery system is** in full use and ~~have 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; Process 2, System 1; Process 3, System 1; Process 4, System 1]

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BACKGROUND:

DeMenno/Kerdoon, Inc. (D/K, Facility ID #800037) operates a Title V, NO_x-RECLAIM facility in the city of Compton. The initial Title V permit (A/N 334197) was issued on 7/1/2011. The Title V permit was last revised on May 1, 2013.

This facility receives used oil, used antifreeze and oily wastewater. These materials are delivered by truck and unloaded into fixed roof storage tanks. Oil and antifreeze are processed into recycled products. Oily water is processed in an industrial wastewater treatment system, and discharged to Los Angeles County Sanitation Districts (LACSD). Recycled products are loaded into tanker trucks or drums for shipment. D/K operations are also subject to a permit issued by the California Department of Toxic Substance Control (DTSC).

Application number 551690 was received on May 22, 2013 for permit modifications (Caustic Scrubber – Process Waste Gas, active permit to operate A/N 514876) to:

- 1) add two waste gas knockout pots
- 2) add one KO pot drain pump
- 3) remove the caustic scrubbers and their auxiliary equipment:

Equipment Name	DK Equipment #	AQMD Dev ID #
Caustic Scrubber	D-601	C137
Caustic Scrubber	D-602	C138
Caustic Drum	D-606	D248
Caustic Pump North	P-704A	D251
Caustic Pump Middle	P-704B	D282
Caustic Pump South	P-704C	D325
Water Wash Drum	D-607	D249
Water Wash Pump	P-705	D252
Knock Out Pot	KO-701	D290
KO Pot Drain Pump	P-706	D253

- 4) change the name of Process 9, System 3 from 'CAUSTIC SCRUBBER – PROCESS WASTE GAS' to 'VAPOR RECOVERY SYSTEM – PROCESS WASTE GAS'

Application number 553508 was received on June 25, 2013 for an administrative permit modification (Used Oil Dehydration, active permit to operate A/N 513069) to:

- 1) change the 'connected to' column for device [D128] to show the connection to the two new waste gas knockout pots
- 2) change system condition S15.1 from 'vented to caustic scrubber(s)' to 'vented to Vapor Recovery System – Process Waste Gas'

D/K is adding two additional knockout pots to improve moisture separation in the process waste gas prior to combustion in the plant afterburners. The liquid (mostly water) accumulated in the KO pots is transferred to the wastewater treatment plant for treatment and disposal to the plant sewer connection.

D/K will be removing Process Waste Gas Caustic Scrubber because it is no longer required due to the installation of a new SO_x scrubber [device C301] in 2012. The caustic scrubber was originally installed to remove H₂S from the process waste gases in order to reduce the SO_x emissions from the facility afterburners



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[devices C142 & C281]. In 2009, gas samples showed that the process waste gas contained more than the 40 ppmv total sulfur concentration allowed under Rule 431.1. Notice of Violation P56551 was issued to D/K on August 29, 2009, for Rule 431.1 exceedances. On March 12, 2010, Order for Abatement (Hearing Board Case 5753-1) was issued requiring D/K to install two SOx scrubbers to control SOx emissions from the primary facility afterburner [device C281] and the backup facility afterburner [device C142]. D/K has installed the SOx scrubber [device C301] on the primary facility afterburner; this SOx scrubber has been in service since July 2012. D/K has demonstrated that, as expected, this SOx scrubber alone controls the total sulfur emissions to less than 6.7 pounds per day (calculated as SO₂, permit condition E448.2), without also using the Process Waste Gas Caustic Scrubber [Attachment #4 – SOx CEMS data for May 2013 – maximum = 0.52 lb/day, average = 0.32 lb/day, as SO₂]. Therefore, the Process Waste Gas Caustic Scrubber has been taken out of service, and D/K plans to remove this equipment to make room for the second SOx scrubber to control SOx emissions from the backup facility afterburner.

PROCESS DESCRIPTION:

After the equipment modifications described above the Vapor Recovery System – Process Waste Gas (Process 9, System 3) receives gases from the process vents in the following units:

Used Oil Dehydration (Process: 1, System: 1)

Vacuum Distillation Unit No. 1 (Process: 1, System: 2)

Vacuum Distillation Unit No. 2 (Process: 1, System: 3)

PRM Stripper (Process: 2, System: 1)

Naphtha Splitter Unit (Process: 3, System: 1)

Ethylene Glycol Distillation (Process: 4, System: 1)

Waste Water Treatment (Process: 5, System: 1)

All the process vents are connected to the Accumulator Drum (D128) listed in the Used Oil Dehydration Unit (Process 1, System 1). This Drum separates any condensed liquids, with all non-condensable gases vented to the knockout pots in this permit unit. Process waste gas is then sent to the afterburners (Process 9, Systems 7 & 13). Process flow diagrams PWG and AB show the equipment and venting path from the accumulator drum to the afterburners, and are included as Attachments #1 and #2.

FEE EVALUATION

The fees paid for the application is:

Application Fees Paid

A/N	Equipment	BCAT/ CCAT	Type	Status	Fee Schedule	Fees Required, \$	Fees Paid, \$
551690	Caustic Scrubber	42	50	20	D	4,747.86	4,747.86
--	Expedited Permit Processing Fee	--	--	--	--	2,373.93	2,373.93
553508	Used Oil Dehydration	999993	63	20	Admin	710.82	710.82
553510	RECLAIM/Title V Minor Revision	555009	85	21	--	1,789.12	1,789.12

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EMISSIONS CALCULATIONS:

This vapor recovery system is an intermediate part of the control equipment. All potential VOC and TAC emissions are evaluated at the process vents and afterburners. Under normal operating conditions the vapor recovery system operates under vacuum, and the emissions generated at the process vents are transferred to the afterburners with no intermediate emission points. The only emissions are fugitive emissions from the pumps valves and fittings. D/K has provided estimates of the number of fugitive components removed for removal of the caustic scrubbers and fugitive components added for installation of the two additional knockout pots [Attachment #5]. More components are removed than added; therefore, there is no emission increase.

	Before	Removed	Added	After
VALVE	314	-161	+16	169
CONNECTOR	615	-306	0	309
OTHER	31	-5	+6	32
PRV	1	0	0	1
PUMP	8	-5	+1	4
COMPRESSOR	0	0	0	0
TOTAL	969			515

The entire vapor recovery system is subject to the monitoring and recordkeeping requirements of Rule 1173 (condition F16.1). All fugitive VOC emissions are included in the facility VOC emission limit of 2550 lb/month (condition F2.1). NSR balance for this permit unit is zero.

REVIEW OF COMPLIANCE DATABASE:

On 6/14/2013, the AQMD Compliance Database shows two (2) outstanding Notices to Comply (see Attachment #3) and no outstanding Notice of Violation.

RULES EVALUATION:

PART 1 STATE REGULATIONS

California Environmental Quality Act (CEQA)	
	DeMenno/Kerdoon has submitted Form 400-CEQA, which indicated that this is not a significant project.

PART 2 SCAQMD REGULATIONS

Rule 212	Standards for Approving Permits	November 14, 1997
	These modifications meet all the criteria in Rule 212 for permit approval. Rule 212 public notice is not required.	
212(a)	The modifications were designed so the equipment can operate without emitting air contaminants in violation of Division 26 of the State Health and Safety Code or in violation of AQMD's rules and regulations.	

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212(b)	Does not apply; there is a Permit to Construct.
212(c)(1)	The equipment is located within 1000 feet of a school; however, this is a modification of an existing facility with no increase in emissions from the facility and no increase in health risk at any receptor. Rule 212 public notice is not required.
212(c)(2)	There are no emission increases.
212(c)(3)	This equipment modification does not have an increased cancer risk greater than, or equal to, one in a million (1×10^{-6}) during a lifetime of 70 years or pose a risk of nuisance.

Rule 401	Visible Emissions	November 9, 2001
	Visible emissions are not expected under normal operation.	

Rule 402	Nuisance	May 7, 1976
	Nuisance complaints are not expected under normal operating conditions, with all process waste gas vented to the facility afterburners.	

Rule 407	Liquid and Gaseous Air Contaminants	April 2, 1982
407(a)(1)	Does not apply. CO emissions are not expected.	
407(a)(2)	Discharge of sulfur compounds in excess of 500 ppmv, calculated as sulfur dioxide, is not expected. This vapor recovery system is vented to the afterburners. Discharge of sulfur compounds is controlled by the SOx scrubbers attached to the afterburners, devices C142 and C281.	

Rule 1173	Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants	February 6, 2009
1173(b)	<p><u>Applicability:</u> Rule applies; this facility is a lubricating oil and grease re-refiner.</p> <p>On Form 400A, D/K gives their primary NAICS code as 32191 – Petroleum Lubricating Oil and Grease Manufacturing. Per the NAICS Association website (www.naics.com), this is equivalent to a 1987 SIC code 2992 – Lubricating Oils and Greases. This facility is included in the definition of a “lubricating oil and grease re-refiner” given in Rule 1173(c)(15), which includes SIC code 2992.</p> <p>This equipment is expected to continue to comply with Rule 1173 given proper recordkeeping and inspections. Compliance with Rule 1173 requirements per condition F16.1.</p>	

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REG XIII	New Source Review (NSR)	December 6, 2002
		Application Deemed Complete: June 7, 2013

Rule 1303(a): BACT & Rule 1303(b)	<p>The requirements of Rules 1303(a) and 1303(b) do not apply to this equipment modification since there is no emission increase. This vapor recovery system is an intermediate part of the control system with no intermediate emission points under normal operating conditions. VOC and SOx emissions are evaluated at the process vents and afterburners/SOx scrubbers.</p> <p>No VOC or SOx offsets are required.</p>
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Rule 1401	New Source Review of Toxic Air Contaminants	September 10, 2010
		Application Deemed Complete: June 7, 2013

	<p>The modification of this vapor recovery system does not increase TAC emissions. There is no increase in MICR, cancer burden, chronic HI and acute HI. This vapor recovery system is an intermediate part of the control system with no intermediate emission points under normal operating conditions.</p> <p>This vapor recovery system modification is exempt from the requirements of Rule 1401(d) in accordance with Rule 1401(g)(1)(B): Exemptions-Modification with No Increase in Risk.</p> <p>Federal NSR for toxics does not apply since this equipment is not located at a plant site that is a major source as defined in 40CFR63, Subpart A, §63.2. This facility emits less than 10 tons per year of any HAP and 25 tons per year of all hazardous air pollutants (HAPs).</p>
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Rule 1401.1	Requirements for New and Relocated Facilities Near Schools	November 4, 2005
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1401.1(b)	This is an existing facility.
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REG XX	RECLAIM	May 6, 2005
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	D/K has been designated as a NOx RECLAIM facility. This equipment does not emit NO _x ; therefore, RECLAIM requirements do not apply.
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REG XXX	Title V	November 5, 2010
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	DeMenno/Kerdoon was issued a Title V permit effective on July 1, 2011. This is a minor permit revision as defined in Rule 3000(b)(15).	
Rule 3000 (b)(15)(A)(i)	This revision does not require or change a case-by-case evaluation of: reasonably available control technology (RACT) pursuant to Title I of the federal Clean Air Act; or maximum achievable control technology (MACT) pursuant to 40 CFR Part 63, Subpart B.	
(b)(15)(A)(ii)	This revision does not violate a regulatory requirement.	
(b)(15)(A)(iii)	This revision does not require any significant change in monitoring terms or conditions in the permit.	

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(b)(15)(A)(iv)	This revision does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit.
(b)(15)(A)(v)	This revision does not result in an emission increase of RECLAIM pollutants.
(b)(15)(A)(vi)	This revision does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review or a hazardous air pollutant.
(b)(15)(A)(vii)	This revision does not result in an increase in GHG emissions of >75,000 tpy CO ₂ e.
(b)(15)(A)(viii)	This revision does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement.
(b)(15)(A)(ix)	This revision is not an installation of a new permit unit subject to a New Source Performance Standard (NSPS) pursuant to 40 CFR Part 60, or a National Emission Standard for Hazardous Air Pollutants (NESHAP) pursuant to 40 CFR Part 61 or 40 CFR Part 63.
(b)(15)(A)(x)	This revision is not a modification or reconstruction of an existing permit unit, resulting in new or additional NSPS requirements pursuant to 40 CFR Part 60, or new or additional NESHAP requirements pursuant to 40 CFR Part 61 or 40 CFR Part 63.
A minor permit revision is subject to a 45-day EPA review , Rule 3003(j) and not subject to public participation requirements, Rule 3006(b).	

PART 3 FEDERAL REGULATIONS

40CFR Part 61 Subpart FF	National Emission Standard for Benzene Waste Operations
	<u>Applicability</u> <p>(a) This facility is not a chemical manufacturing plant, coke by-product recovery plant or petroleum refinery as defined in §61.341.</p> <p>(b) This facility does not treat, store or dispose of hazardous waste generated by any facility listed in paragraph (a).</p> <p>This equipment is not subject to the requirements of 40CFR Part 61 Subpart FF.</p>

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40CFR Part 63 Subpart CC	National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries
	<p><u>Applicability</u> - This facility is not a major source as defined in section 112(a) of the Clean Air Act. This facility emits less than 25 tons per year of all hazardous air pollutants (HAPs) listed in table 1 of this subpart, and less than 10 tons per year of any one HAP.</p> <p>This equipment is not subject to the requirements of 40CFR Part 63 Subpart CC.</p>

40CFR Part 63 Subpart DD	National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations
§63.680(a)	<p><u>Applicability</u> - This vapor recovery system is not located at a plant site that is a major source as defined in 40CFR §63.2. This facility emits less than 10 tons per year of any HAP and 25 tons per year of all hazardous air pollutants (HAPs). This equipment is not subject to the requirements of 40CFR Part 63 Subpart DD.</p>

CONCLUSION

Based on the above evaluation, it recommended that the following be issued:

A/N	Recommendation
551690	Issue Permit to Construct (PC) with conditions listed in the Conditions Section
553508	Issue Permit to Construct (PC) with conditions listed in the Conditions Section

List of Attachments

1. DeMenno/Kerdoon Process Flow Drawing # PWG, dated 5/10/2013
2. DeMenno/Kerdoon Process Flow Drawing # AB, dated 10/1/2010
3. AQMD Compliance Database (6/14/2013)
4. SOx CEMS data summary - May 2013
5. Fugitive Component Estimates