

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING DIVISION</b>  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGES 11	PAGE 1
	APPL. NO. 438984	DATE 5/30/2013
	PROCESSED BY Rafik Beshai	CHECKED BY

**PERMIT TO OPERATE**

**COMPANY NAME**                      BP WEST COAST PRODUCTS LLC  
BP CARSON REFINERY

**COMPANY ADDRESS**                P.O. BOX 6210  
CARSON, CA 90749

**EQUIPMENT LOCATION**            2350 E. 223<sup>rd</sup> STREET  
CARSON, CA 90810

**FACILITY ID**                            131003

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 11: BLENDING					
System 1: GASOLINE BLENDING UNIT					S13.2, S56.1
STORAGE TANK, NO. 981, DIESEL CONDUCTIVITY ADDITIVE  A/N <del>475066</del> 438984	D730				H23.30
STORAGE TANK, FIXED ROOF, HOLDING AND TRANSFER, RPV 2940, WITH INTERNAL JET MIXER, 500 GALS; DIAMETER: 4 FT 6 IN; HEIGHT: 4 FT 6 IN  A/N <del>475066</del> 438984	D739				<u>E336.2,</u> <u>H23.28</u>
STORAGE TANK, RPV-2941, NO. 1, 500 GALS; DIAMETER: 4 FT 6 IN; HEIGHT: 4 FT 6 IN  A/N <del>475066</del> 438984	D740				<u>E336.2,</u> <u>H23.28</u>
STORAGE TANK, FIXED ROOF, RPV-2942, NO. 2, 500 GALS; DIAMETER: 4 FT 6 IN; HEIGHT: 4 FT 6 IN  A/N <del>475066</del> 438984	D741				<u>E336.2,</u> <u>H23.28</u>
STORAGE TANK, FIXED ROOF, RPV-2943, NO. 3, 500 GALS, DIAMETER: 4 FT 6 IN; HEIGHT: 4 FT 6 IN  A/N <del>475066</del> 438984	D742				<u>E336.2,</u> <u>H23.28</u>
STORAGE TANK, FIXED ROOF, RPV-5485, NO. 4, 500 GALS; DIAMETER: 4 FT	D743				<u>E336.2,</u> <u>H23.28</u>

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6 IN; HEIGHT: 4 FT 6 IN  A/N <u>475066 438984</u>					
STORAGE TANK, FIXED ROOF, RPV-5486, NO. 5, 500 GALS; DIAMETER: 4 FT 6 IN; HEIGHT: 4 FT 6 IN  A/N <u>475066 438984</u>	D744				<u>E336.2</u> <u>H23.28</u>
STORAGE TANK, FIXED ROOF, RECOVERY, RPV 2944, 250 GALS; DIAMETER: 3 FT; HEIGHT: 6 FT 6 IN  A/N <u>475066 438984</u>	D745				<u>E336.2</u>
TEST CELL, ENGINE, RW 0106 158.03, NO. 3, OCTANE, 4 H.P.  A/N <u>475066 438984</u>	D752				
TEST CELL, ENGINE, RW 0107 158.03, NO. 4, OCTANE, 4 H.P.  A/N <u>475066 438984</u>	D753				
STORAGE TANK, FIXED ROOF, NO. 278, ADDITIVE, COCKTAIL MIX, 560 BBL; DIAMETER: 15 FT ; HEIGHT: 18 FT  A/N: <u>475066 438984</u>	D1620				<b>HAP: (10) [40CFR 63 Subpart CC, #2, 6-23- 2003]</b>
FUGITIVE EMISSIONS, MISCELLANEOUS  A/N <u>475066 438984</u>	D2508				<b>HAP: (10) [40CFR63 Subpart CC, #5A, 6-23- 2003]</b> H23.3

## BACKGROUND

BP West Coast Products LLC (Facility ID 131003) submitted A/N 438984 for modification of the Gasoline Blending Unit, permitted under Process 11, System 1 of the Title V permit. The District issued the initial Title V permit to the BP Carson Refinery on September 1, 2009. The requested change is to amend the Title V permit to reflect actual operation in the field. The application does not involve construction of new equipment or modification of existing equipment. Specifically, the requested permit change is to show that several storage tanks (Device IDs D739, D740, D741, D742, D743, D744, and D745) vent to the Refinery Vapor Recovery System. This connection is shown in the permit by tagging of the devices with condition E336.2. The Refinery Vapor Recovery System is permitted in the Title V permit under Process 21, System 4. Attachment #1 contains a drawing showing that the subject storage tanks are connected to the Refinery Vapor Recovery System.

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The permit amendment to the Refinery Vapor Recovery System, to show that it is connected to tanks in the Gasoline Blending Unit, will be made under an open application for modification of the Refinery Vapor Recovery System (e.g. A/N 514157).

The permit history of the Gasoline Blending Unit is described in the table below.

**Permit History**

A/N	Process/System	Permit #/Application	Date	Permit Description
438984	Process 11, System 1	G1172/475066 F77796/435414 G20835/395957 300379/PC D65290/249697 M35091/C43537 P25710/A47658	1/8/09 9/8/05 10/3/12 11/8/95 11/13/92 12/13/83 5/7/68	<p>The subject equipment is currently permitted under Permit No. G1172 (A/N 475066), issued on January 8, 2009. Under this application Tank 981 (Device D730) was tagged as being subject to Organic Liquid Distribution (OLD) MACT, promulgated under 40 CFR 63 Subpart EEEE.</p> <p>This equipment was previously permitted under Permit No. F77796 (A/N 435414) issued on September 8, 2005. This application involved an Administrative Change to the permit to list "Diesel Conductivity Additive" under Tank 981 (Device D730) and to eliminate out-of-service equipment (Devices D726 and D728) from the facility permit.</p> <p>Permit No. G20835 (A/N 395957) was issued on October 3, 2012 for change of ownership for equipment in the Gasoline Blending Unit (D1618 – D1621). This permit was inactivated because of a subsequent permit, issued under A/N 475066.</p> <p>A Permit to Construct was issued for the Gasoline Blending Unit, under A/N 300379 on November 8, 1995. This modification entailed addition of a gasoline booster pump. This PC application has been cancelled.</p> <p>Previously, this equipment was permitted under Permit No. D65290 (A/N 249697) issued on November 13, 1992. This modification involved addition of two pumps (MTBE Transfer Pump and MTBE Shipping Pump).</p> <p>Previously, this equipment was permitted under Permit No. M35091 (A/N C43537) issued on December 13, 1983.</p> <p>Previously, this equipment was permitted under Permit No. P25710 (A/N A47658) issued on May 7, 1968.</p>

**PROCESS DESCRIPTION**

In producing final gasoline products for the market, several components must be blended. The Gasoline Blending Unit functions to blend gasoline stock from various refinery units (e.g. reformate from catalytic reformer, FCCU gasoline from FCCU) with chemical additives, producing gasoline which meets specifications of vapor pressure, octane and other parameters. This unit includes Tank 981, which is permitted to store Diesel Conductivity Additive. It also includes six 500 gallon tanks, a 250 gallon tank, and two 4 HP test cell engines. Tank 981 (D730) is not vented to the Refinery Vapor Recovery

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System. The facility states that Tank 981 stores Baker Tolad Additive, with a TVP of 0.28 psia at 70°F and HAP content of 17%.

The applicant has submitted a drawing (Attachment #1 - P&ID BF-7300-57201-S2), which shows the connection of fixed roof tanks D739, D740, D741, D742, D743, D744, and D745 to the Refinery Vapor Recovery System. Nitrogen gas is injected into the head space of the tanks and they are connected to the Refinery Vapor Recovery System through pressure control valves.

### **EMISSION CALCULATION**

BP has calculated baseline ROG emissions from fugitive components associated with the Gasoline Blending Unit to be 87 lbs/day, which is equal to 3.62 lbs/hr (found in Attachment #2). Amendment of the permit to indicate that several storage tanks vent to the Refinery Vapor Recovery System, does not impact emissions of criteria pollutants or Toxic Air Contaminant (TAC)s. Therefore, this baseline ROG emissions rate is equal to the post-project emissions rate.

### **RULE EVALUATION**

**CEQA:** The CEQA Applicability Form (400-CEQA) submitted by the applicant indicates that the project does not have any impacts which trigger the preparation of a CEQA document. The expected impacts of the project on the environment are not significant; therefore preparation of an Environmental Impact Report (EIR) is not required.

**Rule 212:** Rule 212 requires public noticing for a modification of a source at a facility subject to Regulation XX if it is within 1000 feet of a school. The subject equipment is not within 1000 feet of the outer boundary of a school. Rule 212 requires noticing when there is an emission increase exceeding any of the daily maxima specified in Rule 212 (g). The subject permit modification does not result in an increase in criteria pollutant emissions. Public noticing is also required if a modification results in an increase in exposure to Toxic Air Contaminants (TAC) such that the Maximum Individual Cancer Risk (MICR) is greater than 1 in a million ( $1 \times 10^{-6}$ ) during a lifetime of 70 years. The subject permit amendment does not result in an increase in TAC emissions and therefore there is no increase in MICR. Public noticing is not required for this project and the requirements of Rule 212 are met.

**Rule 401** With proper operation and maintenance, the subject equipment is not expected to emit particulate matter with a shade as dark as or darker than that designated Ringelmann #1, by the US Bureau of Mines, for a period of 3 minutes in any hour. Continued compliance with the requirements of this rule is expected.

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**Rule 402** With proper operation and maintenance, the subject equipment will not be a source of vapors which cause injury, detriment, nuisance, or annoyance to any considerable number of people or to the public. The subject permit amendment, to show connection of storage tanks in the Gasoline Blending Unit to the Refinery Vapor Recovery system, will not result in an increase in pollutant emissions. Continued compliance with the requirements of this rule is expected.

**Rule 404** This rule limits the concentration of particulate matter in vent flows. It states limits the particulate matter concentration, as a function of volumetric vent flow, up to a maximum concentration of 0.196 grains per dscf. The Gasoline Blending Unit (Process 11, System 1) is not a source of particulate matter emissions. Therefore, continued compliance with this rule is expected.

**Rule 463** This rule states requirements for tanks which have a capacity of 19,815 gallons or greater, storing organic liquids, and for tanks with a capacity between 251 and 19,815 gallons, storing gasoline. Tanks D739, D740, D741, D742, D743, and D744 in the Gasoline Blending Unit (Process 11, System 1) each has a capacity of 500 gallons and is used to blend gasoline range material. Rule 463 requires that such tanks either be equipped with pressure/vacuum valve set to within 10 percent of the maximum working pressure of the container or be equipped with vapor control device which has a vapor recovery efficiency of at least 95% by weight. The subject storage tanks are vented to the Refinery Vapor Recovery System (Process 21, System 4). As stated in previous evaluations for the Refinery Vapor Recovery System (e.g. A/N 433622/433624), this control system is expected to recover 99% of the vapors vented to it from storage tanks (i.e. vapors recovered are 100%, minus any losses through fugitive components). Therefore, venting of the subject storage tanks to the Refinery Vapor Recovery System will result in compliance with the requirements of this rule.

**Reg IX** Since the project is not expected to result in an increase in VOC emissions, it is not a “modification” as defined under 40 CFR 60.14 and does not trigger any additional New Source Performance Standards (NSPS) requirements.

Permit condition H23.3 requires fugitive VOC components, including those in the Gasoline Blending Unit to meet standards promulgated under 40CFR60 Subpart GGG. The BP Carson Refinery has applied the standards under this regulation on a facility-wide basis. This regulation requires that fugitive components meet standards stated in Sections 60.482-1 through 60.482-10, as soon as practicable, or within 180 days of equipment startup. Fugitive components are operated, monitored, and repaired according to the standards of this regulation and are included in the facilities Rule 1173 inspection and maintenance program, which in general is more stringent than the requirements of this

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regulation. Continued compliance with these standards, for new and existing fugitive components associated with these applications, is expected.

**Rule 1178** This rule states requirements for storage tanks which have a capacity equal to or greater than 19,815 gallons, store organic liquids with a true vapor pressure greater than 0.1 psia under actual storage conditions, and are located at facilities which emitted more than 20 tons of VOC in any emissions inventory year starting with the emission inventory year 2000. The tanks in the Gasoline Blending Unit (Process 11, System 1) for which permit amendments are sought (D739, D740, D741, D742, D743, D744, and D745), all have a capacity of less than 19,815 gallons and are therefore exempt from the requirements of this rule.

**Reg XIII** This regulation has requirements for the use of Best Available Control Technology (BACT), providing emissions offsets for increases in non-attainment air contaminant emissions, and performing air quality modeling to assess the impacts of the project on ambient air quality. Per the District's BACT Guideline, BACT is required for projects with an emissions increase of 1.0 lb/day or greater. The subject permit amendment does not result in an increase in criteria pollutant emissions of 1.0 lb/day or greater and therefore BACT is not required. Emissions offsets are not required since the project does not result in an increase of criteria pollutant emissions equal to or greater than 0.42 lbs/day. Air quality modeling only applies to sources which emit NO<sub>x</sub>, CO and/or PM<sub>10</sub>. Since the project does not result in an increase in emissions of these pollutants, air quality modeling is not required.

**Rule 1401** This rule has requirements that TAC emissions associated with a project not result in an increase in Maximum Individual Cancer Risk (MICR) of  $1 \times 10^{-6}$  at any receptor location if T-BACT is not applied, or  $10 \times 10^{-6}$  at any receptor location if T-BACT is employed. Chronic and acute hazard indices are not to exceed 1.0 for any target organ system at any receptor location, and cancer burden is to be limited to 0.5. The permit amendment processed in under this application will not result in an increase TAC emissions. Per 1401(g)(1)(B), a project which causes a reduction or no increase in the cancer burden, MICR or acute or chronic HI, is exempt from the requirements of this rule. Therefore, the subject permit amendment is exempt from the requirements of this rule.

**Reg XVII** This rule pertains to the issuance of pollutants for which attainment of ambient air quality standards has been achieved in the South Coast Air Basin (NO<sub>x</sub>, SO<sub>2</sub>, and CO). The subject permit amendment will not result in an increase in these pollutants and therefore a Prevention of Significant Deterioration (PSD) review is not required.

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**Reg XX** The facility is a part of the District’s RECLAIM program and therefore is subject to RECLAIM requirements. However, the subject permit amendment will not result in an increase in NO<sub>x</sub> or SO<sub>2</sub> and therefore there are no additional RECLAIM requirements for this equipment.

**Reg XXX** This facility is subject to Reg XXX and the initial Title V permit was issued to the BP Carson Refinery on September 1, 2009. Since the project results in no increase in Reg XIII pollutants and Hazardous Air Pollutants (HAP) emissions, it involves a Minor Revision (as defined in Rule 3000) of the BP Title V permit. As such, it is subject to a 45 day EPA review and comment period but is not subject to public notice requirements under Rule 3006.

**40 CFR 63, Subpart CC**

Storage tanks which are vented to the Refinery Vapor Recovery System are not subject to the Refinery MACT regulation, under 40 CFR 63, Subpart CC. Per 40 CFR 63.640(d)(5), emissions points routed to a fuel gas system are not affected sources subject to this regulation. Therefore, the fixed roof tanks venting to the refinery fuel gas system are exempt from the requirements of this regulation.

Fugitive components associated with the Gasoline Blending Unit are subject to Refinery MACT standards. Per 40 CFR 63.648, the fugitive components must be in compliance with standards stated under 40 CFR 60 Subpart VV. These are the same standards required under 40 CFR 60 Subpart GGG. The fugitive components associated with the Gasoline Blending Unit are not physically modified under this application; continued compliance with these standards is expected.

**40 CFR 63, Subpart EEEE**

This regulation establishes emissions limitations, operating limits, and work practice standards for organic hazardous air pollutants (HAP) emitted from organic liquid distribution (non-gasoline) operations at facilities which are major sources of HAP emissions. It applies to storage tanks, storing organic liquids, and to transfer racks at which organic liquids are loaded into or unloaded out of transport vehicles and/or containers.

Requirements for emissions sources not requiring controls include notification, recordkeeping and reporting. For storage tanks with a capacity under 5,000 gallons (such as Tank 981 – Device D730), records must be kept to verify that the storage tank is not required to be controlled.

Storage tanks in organic liquid service, requiring control, must meet one of the following requirements:

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- Reduce organic HAP (or upon approval TOC) by 95% by weight, or as an option, to an exhaust concentration less than or equal to 20 ppmv (@ 3% O2) by use of a control device meeting requirements of 40 CFR 63, Subpart SS, or
- Route emissions to a fuel gas system or back to a process, as specified in 40 CFR 63, Subpart SS, or
- Comply with 40 CFR 63 Subpart WW (control level 2), or
- Use a vapor balance system, to transport organic HAPs from the storage tank, to the transport vehicle.

The facility is also required to develop a written Startup, Shutdown, and Malfunction (SSM) plan according to the provisions of 63.6(e)(3). Periodic reports, stating any deviations from emissions limits, are also required. Continued compliance with the requirements of this regulation is expected.

## RECOMMENDATIONS

Issue the Permit to Operate with the following permit conditions.

S13.2 All devices under this system are subject to the applicable requirements of the following rules or regulations:

<u>Contaminant</u>	<u>Rule</u>	<u>Rule/Subpart</u>
VOC	District Rule	1123

### [Rule 1123, 12-7-1990]

[Systems subject to this condition: Process 11, System 1]

S56.1 Vent gases from all affected devices of this process/system shall be directed to a gas recovery system, except for the venting of gases from equipment specifically identified in a permit condition, and for the following events for which vent gases may be directed to a flare:

- 1) Vent gases resulting from an Emergency as defined in Rule 1118 ;
- 2) Vent gases resulting from Planned Shutdowns, Startups and/or Turnarounds as defined in Rule 1118, provided that the owner/operator follows the applicable options and any associated limitations to reduce flaring that were identified, evaluated and most recently submitted by the owner/operator to the Executive Officer pursuant to Rule 1118, or any other option(s) which reduces flaring for such planned events; and

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3) Vent gases due to and resulting from an Essential Operational Need, as defined in Rule 1118.

The evaluation of options to reduce flaring during Planned Shutdowns, Startups and/or Turnarounds shall be updated annually to reflect any revisions, and submitted to the Executive Officer in the first quarter of each year, but no later than March 31st of that year.

This process/system shall not be operated unless its designated flare(s) are in full use and have valid permits to receive vent gases from this process/system.

Vent gases shall not be released to the atmosphere except from the existing safety devices or relief valves on the following equipment:

1. Process 1, System 2: 10, 12, 14
2. Process 1, System 3: 19, 20, 24 to 26, 39
3. Process 1, System 5: 41, 42, 2726
4. Process 1, System 6: 43, 49, 57, 58
5. Process 1, System 7: 59, 60, 61, 62
6. Process 2, System 1: 74, 77, 2388
7. Process 2, System 2: 82, 89, 90, 92, 2389
8. Process 2, System 3: 94, 95
9. Process 2, System 5: 98, 101, 102
10. Process 2, System 6: 111, 112, 113
11. Process 2, System 11: 159, 160
12. Process 3, System 1: 164 to 167, 170, 172 to 181, 184, 1336 to 1349, 2382, 2387
13. Process 3, System 2: 186, 188, 189, 191, 196, 199, 201, 204, 1352 to 1355
14. Process 3, System 4: 241
15. Process 3, System 6: 242, 245 to 247, 249
16. Process 3, System 7: 1363
17. Process 4, System 1: 253 to 256, 258, 262, 265, 266, 277, 278, 283. 287, 1364, 1366, 1367, 1372, 1374 to 1376, 1378 to 1381
18. Process 4, System 2: 291, 1400 to 1403
19. Process 4, System 3: 292, 293, 299
20. Process 4, System 4: 302, 304
21. Process 4, System 5: 308, 310, 311
22. Process 4, System 7: 1975, 1977, 1980
23. Process 5, System 1: 314 to 317, 319, 320, 323 to 332
24. Process 5, System 2: 335 to 338, 340, 343, 348 to 353
25. Process 5, System 3: 356, 360, 1413
26. Process 5, System 4: 401, 406, 407, 412, 414

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27. Process 6, System 1: 426, 427, 429, 431, 434, 435, 437, 440, 444, 445, 455 to 456, 458, 460
28. Process 6, System 2: 462, 469, 474 to 475, 477 to 481, 483, 486
29. Process 6, System 3: 490, 494, 495, 498, 501, 503, 506, 507, 509, 510, 512, 513, 518, 520, 521, 525 to 528
30. Process 7, System 1: 542 to 548, 550, 552 to 558, 560, 562 to 569
31. Process 7, System 2: 2892, 2893
32. Process 8, System 1: 593 to 597
33. Process 8, System 2: 608, 610, 612 to 614, 622, 624
34. Process 9, System 1: 631, 632, 638 to 652, 659 to 663, 666 to 668, 1482, 1483, 1486 to 1488, 1491, 1493 to 1495, 1497 to 1502, 1528, 1533 to 1536, 2019
35. Process 9, System 2: 672 to 681, 685
36. Process 9, System 9: 637, 653, 656, 658, 664
37. Process 10, System 1: 706
38. Process 10, System 2: 709, 711 to 715, 720, 721
39. Process 10, System 3: 725
40. Process 11, System 1: 730, 1620
41. Process 12, System 1: 756, 759
42. Process 12, System 2: 760 to 762, 764
43. Process 12, System 3: 765 to 770
44. Process 12, System 4: 771, 772, 774
45. Process 12, System 8: 785, 790, 2365, 2366
46. Process 12, System 9: 794, 797 to 799
47. Process 12, System 10: 806
48. Process 12, System 12: 815, 818
49. Process 12, System13: 823, 828
50. Process 12, System 16: 830
51. Process 12, System 17: 832
52. Process 12, System 22: 853, 854
53. Process 12, System 24: 860, 861, 863, 864, 865
54. Process 12, System 25: 866, 867, 869, 870, 871, 2003
55. Process 12, System 27: 873 to 875
56. Process 15, System 7: 1644 to 1646, 1648, 1649
57. Process 16, System 3: 1986, 2115 to 2120, 2353, 2394
58. Process 21, System 1: 1304
59. Process 21, System 2: 1307
60. Process 21, System 4: 1315, 1316, 1319, 1323 to 1325, 1659

**[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996]**

[Systems subject to this condition: Process 11, System 1]

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E336.2 The operator shall vent the vent gases from this equipment as follows: All vent gases under normal operating conditions shall be directed to a vapor recovery system. This equipment shall not be operated unless the vapor recovery system (consisting of three compressors operated independently or concurrently at any given time) is in full use and has a valid permit to receive vent gases from this equipment.

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

[Devices subject to this condition: D739, D740, D741, D742, D743, D744, D745]

H23.3 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1173
VOC	40CFR60, SUBPART	GGG

**[RULE 1173, 5-13-1994; RULE 1173, 2-6-2009; 40 CFR 60 Subpart GGG, 6-2-2008]**

[Devices subject to this condition: D2508]

H23.28 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	463

**[RULE 463, 5-6-2005]**

[Devices subject to this condition: D739, D740, D741, D742, D743, D744]

H23.30 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
HAPs	40CFR63, SUBPART	EEEE

**[40 CFR 60 Subpart EEEE, 7-28-2006]**

[Devices subject to this condition: D730]