



# South Coast Air Quality Management District

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February 18, 2009  
Via Electronic Submittal

Mr. Gerardo C. Rios  
U.S. EPA – Region IX  
Mail Stop A-5-2  
75 Hawthorne Street  
San Francisco, CA 94105

**Subject: Final Title V Permit for Paramount Petroleum Corporation (ID 800183)**

Dear Mr. Rios: *Gerardo*

Thank you for your comments of December 9, 2008 on the proposed Title V permit for this facility. The District's response to your comments is attached. Based on EPA's comments, we have made some changes to the proposed permit and statement of basis. These changes, which were discussed with your staff, have been incorporated in the District's response.

In addition to changes made in response to EPA comments, several other changes were made to administratively clean up the permit based on facility comments. These administrative changes had no impact on emissions and are summarized below:

Device	Section	Process	System	Changes
C167	D&H	6	6	Device condition C6.12 language was changed to specify monitoring of percent spent caustic to not exceed 70 percent instead of pH.
D339, D340, D341	D	10	2	Mixer from these storage tanks has been removed from the permit equipment description.
D46	H	2	2	Device condition B61.6 has been corrected with the appropriate TRS limit of 100 ppmv.
D273, D274, D277, D287, D288, D289, D290, D291, D293, D303, D523, D525, D527, D528	D	10	1	Device condition C6.11 has been edited to specify the 500°F temperature limit shall be replaced by a 450°F temperature limit whenever these storage tank stores MAC10 or asphalt products containing MAC10.
D267, D268, D269, D271, D275, D276,	D	10	1, 2	Device condition D12.8 language was changed to specify the temperature being

D278, D279, D280, D281, D282, D283, D284, D286, D292, D294, D295, D296, D297, D298, D299, D300, D301, D302, D304, D305, D306, D323				monitored shall be recorded at least once per 12 hour shift.
D277, D287, D288, D289, D290, D291	D	10	1	Replaced device condition E336.3 with new and improved condition E336.4 to allow vent gas from these storage tanks to vent to backup carbon absorbers whenever incinerator C531 is shutdown during outages.
D273, D274, D277, D287, D288, D289, D290, D291, D293, D303, D523, D525, D527, D528	D	10	1	Condition H23.18 was removed from these asphalt storage tanks with a temperature limit because vapor pressure at the permitted temperature limit is below Rule 463(c) threshold.

We are transmitting to you via electronic submittal the following attachments to this letter:

1. AQMD Response to EPA Comments
2. Statement of Basis
3. Final Title V permit, with an effective date of 2-27-09
4. Letter to facility

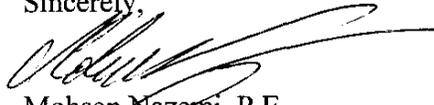
Please note that local permits in the table below were issued to Paramount pursuant to Rule 3002(a) as part of this Title V permit. This rule allows the District to issue a non-Title V permit to existing Phase One or Phase Two facilities that apply for a non-Title V permit prior to the issuance of their initial TitleV permit. **Therefore, in accordance with device condition I30.1, the facility is required to file an application for a Title V permit revision for this equipment within 90 days of the issuance of the facility's initial Title V permit.**

	A/N	Equipment	Device ID	Permit Action	Process	System
1	487936	Selective Catalytic Reduction System	C77	Replace catalyst	3	3
2	491587	Heater H-306	D76	District's request to submit basic equipment to ensure compliance with new catalyst.	3	2
3	491588	Heater H-305	D75	District's request to submit basic equipment to ensure compliance with new catalyst.	3	2

	A/N	Equipment	Device ID	Permit Action	Process	System
4	491589	Heater H-304	D74	District's request to submit basic equipment to ensure compliance with new catalyst.	3	2
5	491590	Heater H-303	D73	District's request to submit basic equipment to ensure compliance with new catalyst.	3	2

Questions on the subject Title V permit should be directed to Thomas Lee, Air Quality Engineer, at (909) 396-3138/[tlee1@aqmd.gov](mailto:tlee1@aqmd.gov).

Sincerely,



Mohsen Nazemi, P.E.  
Deputy Executive Officer  
Engineering and Compliance

MN:JC:TL  
Attachments

cc: Title V Application File  
Jay Chen