

Date TBD

Mr. Marshall G. Waller
Phillips 66 Company, LA Refinery, Carson Plant
1520 E. Sepulveda Blvd
Carson, CA 90745

SUBJECT: A/N 539611- 40CFR63 Subpart UUU Operation, Maintenance and Monitoring Plan for SRU

Dear Mr. Waller:

The South Coast Air Quality Management District has reviewed your 40CFR63 Subpart UUU Operation, Maintenance and Monitoring Plan (OMMP) dated September 19, 2005 for your SRU. 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:

Requirements for Emissions of HAP	
Compliance option	Subject to NSPS
Parameters to be monitored	SO ₂ concentration using CEMS at SRU incinerator stacks
Emission limits	SO ₂ ≤ 250 ppmv (dry basis, 0% excess air) at SRU incinerator stacks
Operating Parameter Limit	Not applicable
Monitoring Procedure (Emissions)	Collect the hourly average SO ₂ monitoring data at SRU incinerator stacks according to §63.1572; calculate and record the 12-hour rolling average SO ₂ concentration, and maintain the 12-hour average SO ₂ concentration at or below 250 ppmv (dry basis, 0% excess air)
Monitoring Schedule	Continuously when SRU is in operation
QA/QC	Per Performance Specification 2 for SO ₂ CEMS [40CFR60 Appendix B] and Quality Assurance Procedure 1 [40CFR60 Appendix F] with RATA annually instead of quarterly
Maintenance Schedule	Routine preventive maintenance each weekday, and per manufacturer recommendations

Requirements for Emissions of HAP	
Bypass lines	<p>Conduct monthly visual monitoring of the car-seals on the two sour water stripper lines that bypass the SRU and vent directly to the flare. Record whether the bypass line valves are maintained in the closed position and whether flow is present in the lines. Record and report the time and duration of any bypass.</p> <p>Conduct monthly visual monitoring of the car-seals on the two Claus reactor lines that bypass the SCOT TGTU and vent directly to either the catalytic or thermal incinerator. Record whether the bypass line valves are maintained in the closed position and whether flow is present in the lines. Record and report the time and duration of any bypass.</p> <p>Continuously monitor the flow indicators on the two DEA regenerator lines that bypass the SRU and vent directly to the flare. Monitor whether device is operating properly and whether flow is present in the bypass line. Record and report the time and duration of any bypass.</p>

Based on the information submitted, your SRU 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