

June 5, 2014

VIA EMAIL

Mr. Merrill Hickman
Senior Air Quality Engineer
Applied Science & Technology Division
South Coast Air Quality Management District
21865 E. Copley Drive
Diamond Bar, CA 91765-4182

Re: Permit Application for Gasoline Storage and Dispensing Unit (A/N 563079, Facility ID 800089)

Dear Mr. Hickman:

Pursuant to my request and discussions with Chingli Lin, this letter is a formal request to expedite the Title V permit review process with EPA for the permit application for the gasoline storage and dispensing unit (A/N 563079). We are requesting the District to issue us the final Title V Permit before June 20, 2014. Currently, the refinery is using the gasoline storage and dispensing unit under various locations permit. The refinery cannot use the gasoline storage and dispensing unit under various locations permit after June 20, 2014 as the regulations only allow us to use the unit for up to one year (unit first used on June 20, 2013).

We are requesting the expedited EPA review process because of the following reasons:

1. There would be a tremendous efficiency issue with getting people, tools & equipment around the refinery. Not all equipment is capable of fueling outside the refinery on both sides of the business (employees & contractors).
2. Registering all vehicles that are used in the refinery to get fuel from other places (outside the refinery) would have an unknown cost associated with that change.
 - a. It will also pose a controls issue with vehicles leaving the refinery for fueling (with tools/equipment on trucks).
3. It will be hard for us to meet gasoline demand for the employees and contractors using the portable 250 gal tank (R219 exempt) and dispenser.
 - a. Much inefficiency – repeated fueling, additional costs for tanker, additional work hours, and 250 gal tank leasing cost.

We will appreciate your prompt assistance to expedite the Title V Permit Review with EPA. Please note that permitting group has completed their review process for the subject application. Please contact Parvez Abbas at (310) 212-1755 with any questions or comments.

Sincerely,


Penny Wirsing

Environmental Section Supervisor

cc: Parvez Abbas, XOM, via email
Chingli Lin, AQMD, via email
Phillip Szymanski, AQMD, via email
George Illes, AQMD, via email
Valerie Tse, XOM, via email