South Coast
Air Quality Management District
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December 30, 2008

Mr. Maxwell A. Ocansey
Refinery Manager
ExxonMobil Oil Corporation
3700 West 190th Street
Torrance, CA 90509-2929

Subject: Transmittal of Initial Title V Permit

Facility ID	Facility Name	Address
800089	ExxonMobil Oil Corporation Torrance Refinery	3700 West 190th Street Torrance, CA 90509-2929

Dear Mr. Ocansey:

Enclosed is the initial Title V permit issued by the South Coast Air Quality Management District (AQMD) for the facility listed above. Effective January 25, 2010, the enclosed Title V permit will supersede the current revision of the RECLAIM Facility Permit issued to your facility by the AQMD.

The draft copy of this permit was submitted to the U.S. EPA Region IX (EPA) for 90-day review period starting April 8, 2009, and made available for a 60-day public comment period starting April 8, 2009. The AQMD received comments on the draft permit from the EPA, the facility, and the public. Based on these comments, we have made the following changes to the proposed Title V permit:

List of Changes to the Proposed Title V Permit – ExxonMobil Torrance Refinery Plant

#	Affected Device/Condition	Modification	Background/ Reason
Based on EPA comments (letter dated July 8, 2009) and ExxonMobil comments (letter dated June 10, 2009)			
1	Condition I1.1, Sections D & H	Revised to include the language as underlined below: **In the first paragraph:** *The operator shall comply with all the requirements of the condition and compliance schedule as specified in the variance case no. 1183-414, issued on July 15, 2008, in accordance ...* **In the second paragraph:** *The variance (or Order for Abatement) referenced in this condition does not affect federal or citizen enforceability of the underlying SIP approved rules for which the applicant is receiving the variance (or Order for Abatement).*	This is in response to an EPA comment.

#	Affected Device/Condition	Modification	Background/ Reason
2	Condition H23.19	Removed Subpart D applicability imposed on boilers Devices D1236 & D1239.	This is in response to an EPA comment.
3	Federal rule dates	Updated rule citation date of the NSPS and NESHAP with latest promulgated date as shown in Section K of the permit.	This is in response to an EPA comment.
4	Condition D330.1	Revised this condition to replace "R461(d)(5)" with "R461".	District R461 amended on 3/7/08.
5	Devices C626, D269, D924, D925, C686, C687, C1776, D803, D805, D922, D1236 & D1239	Imposed Conditions E193.16 & H23.13 to address NSPS Subparts A & J applicability and tag with CD.	This is in response to an EPA comment.
6	Devices D1912, D1943, D668 & D671(Process 12, Systems 1 & 2)	Tagged CD to existing Condition S13.6.	This is in response to an EPA comment.
7	Devices C891 (D&H), C892, C894 (D&H) & C1558	Imposed Condition H23.13 to address Subpart J applicability and tag with CD.	This is in response to an EPA comment.
8	D367 (H)	Imposed four conditions (B61.3, D90.12, E193.16 and H23.13) in Section H for this device to be consistent with Section D's conditions.	This is in response to an EPA comment.
9	D1944, D1945, D2305, D2307, D169, D170 & D171	Revised the equipment description to add "unfired" wording.	This is in response to an EPA comment.
10	Condition H23.10 addresses R1173 & tags with R1173	Replaced this condition, currently imposed on the following devices, with the modified Condition H23.34 to address R1173 & GGGa and tag with R1173, GGGa & CD. <u>Section D</u> - Devices subject to this condition: D869, D1475, D1527, D1790, D1792, D1794, D1808, D1809, D1810, D1815, D1819, D1830, D1834, D1839, D1840, D1844, D1846, D1847, D1860, D1862, D1863, D1864, D1865, D1877, D1888, D1890, D1891, D1892, D1894, D1895, D1938, D1955, D1956, D2009, D2010, D2366, D2367, D2368, D2369, D2370, D2371, D2372, D2373, D2374, D2375, D2376, D2377, D2378, D2379, D2380, D2383. <u>Section H</u> - Devices subject to this condition: D1834, D1844, D1855, D2014, D2123, D2351, D2352.	This is in response to an EPA comment dated 06/10/09, and EM notification to EPA dated 8/24/09.
11	Devices D1846 & D1894	Removed these devices from permit condition (H23.10) since they are duplicated with D1988 & D2378, respectively.	District permit clean-up.

#	Affected Device/Condition	Modification	Background/ Reason
12	Condition H23.36 addresses R1173 & GGGa and tags with R1173 & GGGa)	Imposed this newly created condition to fugitive Device D2254 (Crude Desalter Unit – installed 5/29/08) and compressor Device D2235 (Cogen-H2 plant – installed 5/29/08) per their installation dates (Section H).	This is in response to an EPA comment and District permit accuracy.
13	Condition H23.14 addresses R1173 & GGG and tags with R1173 & GGG	Replaced this condition, currently imposed on the following devices, with the modified Condition H23.34 to address R1173 & GGGa and tag with R1173, GGGa & CD. Section D - Devices subject to this condition : D1740, D1788, D1789, D1791, D1793, D1800, D1803, D1805, D1807, D1811, D1825, D1826, D1827, D1828, D1829, D1831, D1838, D1842, D1845, D1849, D1850, D1851, D1853, D1889, D1936, D1937, D1957, D1983, D1987, D2231, D2256, D2259, D2330. Section H - Devices subject to this condition: D2249.	This is in response to an EPA comment dated 06/10/09, and EM notification to EPA dated 8/24/09.
14	Condition H23.34 addresses GGG and tags with GGG & CD	Modified this condition, currently imposed on the following devices, to address R1173 & GGGa, add a child condition, and tag with R1173, GGGa & CD. Section D - Devices subject to this condition: D869, D1475, D1527, D1740, D1788, D1789, D1790, D1791, D1792, D1793, D1794, D1800, D1803, D1805, D1807, D1808, D1809, D1810, D1811, D1815, D1819, D1825, D1826, D1827, D1828, D1829, D1830, D1831, D1834, D1838, D1839, D1840, D1842, D1844, D1845, D1849, D1850, D1851, D1853, D1860, D1862, D1863, D1864, D1865, D1877, D1888, D1889, D1890, D1891, D1892, D1895, D1936, D1937, D1938, D1955, D1956, D1957, D1983, D1987, D1988, D2009, D2010, D2231, D2256, D2259, D2330, D2366, D2367, D2368, D2369, D2370, D2371, D2372, D2373, D2374, D2375, D2376, D2377, D2378, D2379, D2380, D2383. Section H - Devices subject to this condition: D1844, D1855, D2014, D2111, D2123, D2249, D2351, D2352.	This is in response to an EPA comment dated 06/10/09, and EM notification to EPA dated 8/24/09.
15	Fugitive Devices D1803, D1810 & D1834 (Section H)	Added the modified Condition H23.34 to these devices in Section H to be consistent with Section D.	District permit clean-up.
16	Compressors Devices D981, D982, D983 & D984 (Section H)	Changed type of equipment from "C981, C982, C983 & C984" to "D981, D982, D983 & D984" since the compressor is basic type equipment instead of control type equipment.	District permit clean-up.

#	Affected Device/Condition	Modification	Background/ Reason
17	Device D2352	Revised to add "AN 369332"	This is in response to an EPA comment.
18	Section J, Subpart CC, #1 6-23-2003 template	Revised Condition 2a to include "on a dry basis, corrected to 3 percent oxygen" for the 20 ppm HAP concentration limit.	This is in response to an EPA comment.
19	Section J, Subpart CC, #2 6-23-2003 template	Condition 1 table has been amended: For Emission Point (Storage Tank), the Section listing included a citation of §63.646(b)(1) and (2).	This is in response to an EPA comment.
20	Section J, Subpart UUU, #1 4-20-2006 template	Condition 6 table has been amended to include emission limits of inorganic HAP and associated operating limits for existing semi-regenerative CRU.	This is in response to an EPA comment.
21	Section J, Pages 14 & 15	Removed Pages 14 & 15 of Section J since they are duplicates of Pages 16 & 17.	District permit clean-up.
22	C165-66, C2283-84	Removed Subpart UUU currently tagged to ESPs devices in Emission Column.	This is in response to an EPA comment.
23	D668, D671 & D653	Tagged Subpart UUU in Emissions Column for these devices.	This is in response to an EPA comment.
24	Devices D275-D278, D237-D240, D245-D247	Removed the HAP UUU #1 currently listed in the Emission Column since these devices of the CRUs are not process vents.	This is in response to an EPA comment.
25	Condition P13.2	Removed this condition from Sections D & H.	This is in response to an EPA comment.
26	Devices C164	Imposed Condition D82.2 on this CO boiler Device C164.	This is in response to an EPA comment.
27	Device C2314	Connected this device to Device D151 in Sections D & H.	This is in response to an EPA comment.
28	D895, D896, D1384, D1591 & D1592	Removed "connect to" the flares for these knockout pots.	This is in response to an EPA comment.
29	Device C1558	Imposed Conditions D323.1 (with a ½ year frequency) & H23.13 on this clean service flare.	This is in response to an EPA comment.
30	Devices D684 & D685	Added "fixed roof" in the equipment description.	This is in response to an EPA comment.
31	Section K, Facility Rules Table	Remove 40CFR60 Subpart D. Updated 40CFR60 Subparts Db, J, QQQ with latest date. Updated 40CFR63 Subpart CC with latest date. Removed *40CFR 63 Subpart CC (5-25-2001)* Removed *40CFR 63 Subpart UUU (2-9-2005)*	This is in response to an EPA comment.
32	Section K, Facility Rules Table	Updated District Rules with latest date.	District permit clean-up.
33	Title V Periodic Monitoring Condition	Removed the following text from conditions C8.4, C12.1, D28.11, D28.12, D29.2, D29.3, D29.5, D323.1, D323.2, D328.1, D330.1, E102.2, K67.1, K67.2, K67.3, K67.5 (Section D); C12.1, D28.4, D28.9, D29.3, D29.5, D323.1, D323.2, D328.2, E102.1, E193.10, K67.2, K67.4 (Section H): "*This condition shall become effective when the initial Title V permit is issued...*"	These conditions are effective upon issuance of the Title V permit.

#	Affected Device/Condition	Modification	Background/ Reason
34	Condition H23.34	Modified existing Condition H23.34 to address refinery-wide subject to GGGa.	This is in response to an EPA comment dated 06/10/09, and EM notification to EPA dated 8/24/09.
35	Device D1847	Removed the modified Condition H23.34 (formerly H23.10) since this device is not in VOC service.	This is in response to an EPA comment.
36	Seven Compressors Devices D574 (P4S5-D&H); D355, D356 (P6S1); D1298 (P9S1); D525 (P9S2); D1556 (P19S5); D1939 (P19S7)	Imposed the modified Condition H23.34 to these devices to address R1173 & GGGa and tag with R1173, GGGa, and CD.	This is in response to an EPA comment dated 06/10/09, and EM notification to EPA dated 8/24/09.
37	Ten Compressors Devices D119 (P2S2); D390 (P6S2-D&H); D542 (P9S2); D980, D981-D&H, D982-D&H, D983-D&H, D984-D&H, D985, D986 (P19S3)	Imposed the modified Condition H23.34 to these devices to address R1173 & GGGa and tag with R1173, GGGa, and CD. District records show that these 10 compressors are subject to Subpart GGG per their installation dates.	This is in response to an EPA comment dated 06/10/09, and EM notification to EPA dated 8/24/09.
38	Condition C1.69	Imposed this condition on six water pumps ICEs (Devices D955, D957, D959, D961, D1500 & D1785).	This is in response to an EPA comment.
39	Condition C1.70	Imposed this condition on three emergency power ICEs (Devices D394, D1686 & D1786).	This is in response to an EPA comment.
40	Condition D323.1	Removed this condition from cyclone C1590 since this is not a process vent.	District permit clean-up.
41	Device D2235	Removed Condition H23.14.	This is in response to an EPA comment and District permit accuracy.
42	Device D2254	Removed Conditions H23.14 & H23.34.	This is in response to an EPA comment and District permit accuracy.
43	Devices D668 & D671	Added Subpart UUU in Emissions Column	This is in response to an EPA comment.
44	Conditions D323.1 & D323.2	Removed the last sentence "*If any visible emissions.... the operator shall either*" from Paragragh 1.	District permit clean-up.
45	C891 & C894	Added Condition H23.13.	This is in response to an EPA comment.

Questions on the subject Title V permit should be directed to Ms. Ngoc Tran at (909) 396-2606 or ntran@aqmd.gov.

Sincerely,

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

MN:JC:TV:NT

Attachment: Title V Permit

cc: Compliance, Title V Application File & Facility Permit Notebook (with attachment)
Gerardo C. Rios (EPA); Barry R. Wallerstein, William Thompson & Jay Chen (w/o attachment)

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