



South Coast Air Quality Management District

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April 12, 2013
Via Electronic Submittal

Mr. Gerardo Rios
Chief – Permits Office
US EPA Region IX
75 Hawthorne Street, Air 3
San Francisco, CA 94105

Re: Proposed Title V Permit Revision for DeMenno/Kerdoon (Facility ID 800037)

Dear Mr. Rios:

Enclosed for your review are proposed revisions to the Title V Permit for DeMenno/Kerdoon, located at 2000 N. Alameda Street, Compton, CA. The proposed revisions are considered to be De Minimis Significant and a public notice is not required. We are enclosing the proposed revised portions of Section D and Section H, which include the changes as shown below and the engineering evaluations. The primary reason for the revision is the installation of a new acid-gas scrubber C300, which will reduce emissions of oxides of sulfur to the atmosphere. **It is requested that the review of this draft permit be expedited and EPA closes its comment period by April 30, 2013 in order to facilitate the issuance of the Permit to Construct and to reduce emissions.**

SECTION D: PERMITS TO CONSTRUCT/OPERATE

Equipment/Device	Application No.	Description of Revision
Pump / D12	547512	Modification of Process 3, System 1 by replacing a 0.75 HP pump with a 2 HP pump.

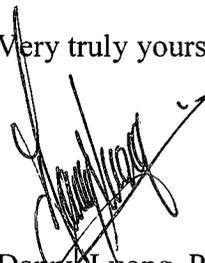
SECTION H: PERMITS TO CONSTRUCT

Equipment/Device	Application No.	Description of Revision
Scrubber / C300	Removed 502732 and replaced with A/N 544927	Modification of Process 9, System 7 by installing a new single-stage scrubber replacing a two-stage scrubber.
Afterburner / C142	527510	Condition F2.2 added to limit and monitor SOX emissions from the afterburner C142 when the afterburner C281 and/or the scrubber C301 are shutdown while the scrubber C300 is being constructed.

		<p>Condition C1.14 added to limit the operating schedule during the afterburner C281 or scrubber C301 shutdowns until the scrubber C300 is constructed and is fully operational.</p> <p>Condition E448.3 added to restrict the afterburner C142 to vent only the vapor recovery system (storage tanks and loading/unloading racks) prior to installation and operation of the scrubber C300 in the event that the afterburner C281 or its scrubber C301 are required to be shut down for maintenance or repairs.</p> <p>Condition E448.4 added to establish operating criteria for operation of the afterburner C142 during the afterburner C281 or the scrubber C301 shutdowns the scrubber C300 is constructed and is fully operational.</p>
Afterburners / C142 & C281	527510 & 527511	<p>Condition D28.1 revised to allow an extension for conducting source tests for afterburner C142 when it has not been operated within three months of the required source tests. Also, the condition is revised to require source tests to determine the control efficiency of afterburners C281 & C142 for VOCs.</p> <p>Condition H116.4 revised to require a minimum control efficiency of 98% for VOCs for afterburners C281 & C142.</p>
Afterburner / C281	527511	<p>Condition D28.3 revised to require source tests to determine the control efficiency of afterburner C281 for destruction of VOCs.</p>

This request is being made via electronic submittal in order to facilitate your review. If you have any questions or need additional information, please contact Mr. Abdi Majidifar at (909) 396-2449 or by email at amajidifar@aqmd.gov.

Very truly yours,



Dang Luong, P.E.
Senior Manager
Refinery & Waste Management Permitting

DL: CDT: AM

Enclosures

cc: Alok Das, Env. Engr. Mgr., DeMenno/Kerdoon, w/o enclosures
File a/ns 544927 & 547513