South Coast Air Quality Management District

Statement of Basis

Proposed Title V Permit

(Issued for Public Notice: 8/29/08)

Facility Name:	Edgington Oil Company
Facility ID:	800264
SIC Code:	2911
Facility Address:	2400 E. Artesia Blvd. Long Beach, CA 90805
Application Number:	339882
Application Submittal Date:	3/26/98
AQMD Contact Person:	Johnny Pan, Air Quality Engineer
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1. Introduction and Scope of Permit

Title V is a national operating permit program for major air pollution sources. Facilities that are subject to Title V need to obtain a Title V permit and comply with specific Title V procedures to modify their permits. The Title V permit replaces the facility's other existing permits. The Title V does not necessarily include any new requirements for reducing emissions from sources. The facility permit under Title V does however include new permitting, noticing, recordkeeping, and reporting requirements.

The South Coast Air Quality Management District (AQMD) implements the Title V through its Regulation XXX – Title V Permits, adopted by the AQMD Governing Board to comply with the United States Environmental Protection Agency (EPA) requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed by AQMD with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings. AQMD also has published a draft of the Technical Guidance Document for Title V (March 2005, Version 4.0) available on the AQMD website at http://www.aqmd.gov/titlev/TGD.html.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant in the South Coast Air Basin. The Basin is in attainment with the National Ambient Air Quality Standards (NAAQS) for NO_2, SO_2, CO, and lead. The status for CO has been redesignated from nonattainment to attainment in June 2007 (72 FR 26718). The status for PM_{10} is currently classified as serious nonattainment by the EPA. The status for ozone is in extreme nonattainment.

The AQMD proposes to issue an initial Title V permit for the Edgington Oil Company refinery located at 2400 E. Artesia Blvd, Long Beach, CA 90805. The refinery is owned and operated by Alon USA Energy Inc. (Alon).

2. Facility Description

The company's Long Beach refinery operates as a "topping refinery" that uses distillation to separate crude oil into asphalt, which Edgington sells as the primary product at the facility, and intermediate distillates such as naphtha, kerosene, unfinished diesel fuel, fuel oil, and gasoil. No finished motor fuels are produced at the refinery, and the company does not use any cracking or hydro-processes that modify the structure of compounds that are constituents in crude oil. Edgington sells its major product, asphalt, for use primarily in the paving and construction industries. The intermediate distillates are sold to other refineries as feed stocks for additional processing into motor fuels and chemical products.

The processing capacity of the refinery is approximately 35,000 barrels of crude oil per day. To process the crude oil into products, Edgington employs atmospheric and vacuum distillation of crude oil, asphalt processing (Blowing stills), treating and stripping, and loading and unloading of intermediate and final products. Primary processing equipment at the refinery includes two atmospheric distillation units and two vacuum distillation units. These process units separate the crude oil by distillation into fractions according to their boiling points. The fractions from the distillation units are off-gases of propane, butane, etc. that are used as a source of energy for one of its process heaters, naphtha, kerosene, unfinished diesel fuel, gas-oil, asphalt, and fuel oil.

The refinery has a fuel gas treating system to remove the majority of the sulfur compounds from the off-gases from the distillation columns before they are combusted in one of the refinery's combustion devices. The refinery operates twelve heaters, two boilers, one incinerator, and three emergency stand-by internal combustion engines that run on diesel. With the exception of one process heater/incinerator that has been permitted by AQMD to burn natural and refinery gases, the other eleven process heaters have been permitted to burn only natural gas. The two boilers are only permitted to burn natural gas.

In the facility's asphalt air-blowing operation, the refinery takes asphalt product from its vacuum distillation and processes it to make roofing asphalt. Onsite loading/unloading racks and internal floating roof and fixed roof storage tanks are used in the transport and storage of the crude oil, asphalt, gasoil, fuel oil, kerosene, unfinished diesel fuel, and naphtha. A small portion of the crude oil is delivered by tank truck to the facility, but most are delivered by pipeline. All asphalt products are transported to customers by tank trucks or railcars. The refinery has the capacity to load the intermediate products into tank trucks for delivery, but the majority of the intermediate products are currently transported to third-party facilities by pipeline for further processing.

Additional operations at the refinery include a kerosene clay treating unit, sour water treatment, caustic scrubbers, refinery fuel gas treating system, a wastewater treatment system, and other miscellaneous process units.

3. Construction and Permitting History

The refinery has been in continuous operation since 1952, with the exception of a shutdown for a period of five years in the 1980's. That facility shutdown was due to the owner at that time who declared bankruptcy. After the refinery's five-year shutdown, the facility was brought online by a new owner following its acquisition of the Edgington refinery in the early 1990's. More recently, the Edgington refinery was acquired by Alon, the current owner of the facility.

During the existence of the Edgington's Long Beach refinery, AQMD has issued numerous Permits-to-Construct (s) (PCs) and Permits-to-Operate (s) (POs) to the refinery since its initial construction in 1952 as a new facility in Long Beach. Those existing permits are contained in the proposed Title V Permit. A major modification was undertaken by Edgington in the 1990's to gain the SOx super-compliant status from AQMD under the RECLAIM program, Regulation XX, so that the company does not have to install a continuous emission monitoring system for SOx if it gains approval. These modifications resulted in the rerouting of refinery fuel gases to just one heater and converting the remaining process heaters to run on natural gas, the installation of a new caustic scrubber, and a new central vapor recovery system.

4. Regulatory Applicability Determinations

Applicable legal requirements with which this refinery must comply have been identified in the Title V permit (for example, Sections D, E, and H of the proposed Title V permit). Device level condition H23.x denote applicability of federal regulations and source specific AQMD Rules to permitted equipment. Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) for this facility have been completed. Federal NSPS requirements of 40 CFR Part 60 apply to certain units at the facility and the permit terms and conditions may be found in Sections D and H of the Title V permit. NESHAP requirements of 40 CFR Part 63 apply to certain units at the facility and the permit terms and conditions may be found in Sections D, H, and J of the Title V permit. Determinations of federal regulations that do not apply can be found in this section of the Statement of Basis.

This section contains a discussion of complex regulatory applicability determinations. This section also summarizes the NSPS and NESHAP applicability determinations for permitted equipment at this facility.

Federal Regulations

Standards of Performance for New Stationary Sources (NSPS) (40 CFR 60)

With the exception of certain specific equipment as further explained in Tables 4.1 – 4.2 below, the refinery would be generally subject to the following NSPSs:

- 40 CFR 60 Subpart J – Standards of Performance for Petroleum Refineries;

- 40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978,
- 40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984;
- 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Storage Vessels (Including Petroleum Liquids Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984;
- 40 CFR 60 Subpart UU – Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture; and
- 40 CFR 60 Subpart GGG – Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries.
- 40 CFR 60 Subpart QQQ – Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems.

The cited regulations specify standards for applicable equipment within the refinery based on the equipment construction date or subsequent modifications that may have resulted in an emission increase as defined by 40 CFR 60.14(a) or may have undergone reconstruction that resulted in a capital cost of the new components exceeding 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility as defined in 40 CFR 60.15(a) and (b). The applicability of the above rules is based on information contained in the permit application files or through refinery responses to information requests by AQMD.

All of the equipment in the Title V Permit have been reviewed to determine whether they are subject to any of the NSPSs. Tables 4.1 and 4.2 below contain tabulated summaries of selected negative determinations regarding NSPS applicability.

Table 4.1 Combustion Sources Not Subject to NSPS Requirements

Device ID	Equipment	Regulation	Summary of Non-Applicability Determination
D194, D196	Boiler	40 CFR 60, Subpart D/Db[1]	Original construction date prior to applicability date and no subsequent modification or reconstruction.
D194, D196	Boiler	40 CFR 60, Subpart J	The combustion devices do not burn refinery gas.
D179 D176, D177 D183, D185, D180, D280, D191, D189, D190	Heater	40 CFR 60, Subpart J	The combustion devices do not burn refinery gas.

[1]40 CFR 60 Subpart D – Standards of Performance for Fossil-Fuel Fired Steam Generators for Which Construction Commenced after August 17, 1971; and 40 CFR 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.

Table 4.2 Storage Tanks and Wastewater Systems Not Subject to NSPS Requirements

Device ID	Equipment	Regulation	Summary of Non-Applicability Determination
D117, D118, D119, D120, D121, D39, D122, D123, D126, D127, D128, D129, D130, D131, D132, D133, D64, D373, D24, D137, D138, D139, D140, D141, D142, D143, D144, D145, D296, D297, D298, D299, D360, D146, D147, D148, D149, D150, D151, D272, D152, D153, D154, D155, D162, D163, D169, D170, D171, D172, D173, D156, D157, D158, D159, D160, D161, D167, D164, D165, D166	Storage Tank	40 CFR 60, Subpart K/Ka/Kb	Tanks were constructed prior to June 11, 1973 and have not been constructed, reconstructed, or modified since then.
D117, D118, D119, D120, D121, D39, D122, D123, D126, D127, D128, D129, D130, D131, D132, D133, D64, D373, D24, D137, D138, D139, D140, D141, D142, D143, D144, D145, D146, D147, D148, D149, D150, D151, D272, D68, D69, D152, D153, D154, D155, D162, D163, D169, D170, D171, D172, D173, D156, D157, D158, D159, D160, D161, D167, D168, D164, D165, D166	Storage Tank	40 CFR 60, Subpart UU	These storage vessels are not affected equipment or have not been constructed, reconstructed, or modified after November 18, 1980.

This refinery is not subject to the NSPSs listed below.

- 40 CFR 60 Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced after August 17, 1971. Refinery does not operate any steam generators that are subject to this subpart.
- 40 CFR 60 Subpart Da - Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978. Refinery does not operate any steam generating units that are subject to this subpart.
- 40 CFR 60 Subpart XX - Standards of Performance for Bulk Gasoline Terminals. The refinery does not own or operate a bulk gasoline terminal on site.
- 40 CFR 60 Subpart III- Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes. The refinery does not conduct any SOCMI operations.
- 40 CFR 60 Subpart NNN - Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations. The refinery does not conduct any SOCMI operations.
- 40 CFR 60 Subpart RRR - Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical. The refinery does not conduct any SOCMI operations.

National Emission Standard for Hazardous Air Pollutants (NESHAP)

As explained below, this refinery is not subject to NESHAP requirements except for reporting and recordkeeping requirements of 40 CFR 61 Subpart FF - National Emission Standard for Benzene Waste Operation. These standards have been incorporated into the Title V permit.

40 CFR 61 Subpart FF

40 CFR 61 Subpart FF-National Emission Standard for Benzene Waste Operations (Benzene Waste NESHAP) defines a major source as any chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery with 10 megagram per year (Mg/yr) (11 tons/yr) or more of benzene in the waste streams. This regulation requires a major source to control benzene in any waste streams that contain 10 parts per million by weight (ppmw) or more of benzene. It requires the removal or destruction of the benzene contained in the waste using a treatment process or waste water treatment system that either a) removes benzene from the waste stream to a level less than 10 ppmw on a flow-weighted annual average basis, b) removes benzene from the waste stream by 99 percent or more on a mass basis, or c) destroys benzene in the waste stream by incinerating the waste in a combustion unit that achieves a destruction efficiency of 99 percent or greater for benzene.

The regulation also specifies a standard for each waste management unit that receives or manages the waste stream before and during treatment of the waste stream. Waste management unit includes tanks, surface impoundments, containers, individual drain systems, and oil water separators.

Facility Condition F52.1 has been tagged to the facility to indicate that Subpart FF applies. The refinery is subject to the recordkeeping and reporting requirements of 40 CFR Sections 61.356 and 61.357, respectively. While the refinery is not subject to the control standards of the subpart per se, it is nonetheless subject to the recordkeeping and reporting requirements per Section 61.357(b).

The refinery is not subject to the NESHAPs listed below.

- 40 CFR 61 Subpart J - National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene. The refinery does not operate any equipment in "benzene service".
- 40 CFR 61 Subpart Y - National Emission Standards for Benzene Emissions from Benzene Storage Vessels. The refinery does not store or transfer benzene.
- 40 CFR 61 Subpart BB - National Emission Standards for Benzene Emissions from Benzene Transfer Operations. The refinery does not store or transfer benzene.
- 40 CFR 63 Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries. The Edgington's facility does not emit hazardous pollutants listed in the regulations that exceeds the thresholds individually or collectively.
- 40 CFR 63 Subpart UUU - National Emission Standard for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units. Edgington does not operate the process units governed by the regulation.
- 40 CFR 63 Subpart EEEE - National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline). Edgington does not produce organic liquids that would subject to this regulation.
- 40 CFR 63 Subpart F - National Emission Standards for Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry. The refinery does not operate any SOCMI operations.
- 40 CFR 63 Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater. The refinery does not operate any SOCMI operations.
- 40 CFR 63 Subpart H - National Emission for Organic Hazardous Air Pollutants for Equipment Leaks. The refinery does not operate any SOCMI operations.
- 40 CFR 63 Subpart Q - National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers. The refinery does not use chromium based water treatment chemicals.
- 40 CFR 63 Subpart R - National Emission Standards for Hazardous Air Pollutants for Gasoline Distribution Facilities. The refinery does not own or operate a bulk gasoline terminal or pipeline breakout station.
- 40 CFR 63 Subpart VV - National Emission Standards for Oil-Water Separators and Organic-Water Separators. This subpart is not applicable because no other subpart of 40 CFR Part 60, 61, or 63 references this subpart, even though this refinery controls emissions from oil-water and organic-water separators.
- 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This subpart does not apply

because this refinery does not own or operate stationary reciprocating internal combustion engines with a site rating of more than 500 brake horsepower.

- 40 CFR 63 Subpart EEE - National Emission Standards for Hazardous Air Pollutants for Hazardous Waste Incinerators. There are no hazardous waste incinerators, cement kilns, or aggregate kilns located at this refinery.
- 40 CFR 63 Subpart GGGGG – National Emission Standard for Hazardous Air Pollutants for Site Remediation. Per 63.7881(b)(3), the equipment are exempted because the site remediation is performed under a RCRA corrective action conducted at a TSDF and is required by a State program per RCRA section 3006.

Compliance Assurance Monitoring (CAM) (40 CFR 64)

This regulation requires facilities of major sources to submit CAM plans to accompany the application for renewal of their respective Title V permits or for initial Title V applications submitted after 4/20/98. Since this application is an initial Title V application submitted prior to 4/20/98, no CAM plans are required at this time.

5. Periodic Monitoring Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit. For example, Section D, F, and J and Appendix B of the proposed Title V permit contain applicable monitoring requirements for Edgington.

This refinery is subject to RECLAIM monitoring, source test requirements, and other monitoring provisions that are required by federal, state or AQMD laws and regulations. Section F of the permit contains permit conditions for monitoring and source testing imposed by Regulation XX. Specifically, Section F summarizes the monitoring and testing requirements for Major, Large and Process units at NOx and SOx RECLAIM facilities. Because Edgington does not operate sources with individual emissions equal or more ten tons per year, Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not currently apply to any of the permitted emission sources at this facility.

As specified in the AQMD Rule 3004(a)(4), the proposed permit includes periodic monitoring conditions for equipment that is subject to approved State Implementation Plan (SIP), federally enforceable rules, which do not require sufficient monitoring to assure compliance with emission limitations or other requirement of the rule. Permit conditions in Section D and H of the permit that fulfill Title V periodic monitoring requirements are tagged with the following: *Rule 3004(a)(4)-Periodic Monitoring, 12-12-1997*. These periodic monitoring conditions are also tagged with the underlying rule(s) for which the condition is satisfying the monitoring requirement. In some cases, existing monitoring conditions that were imposed under New Source Review (NSR) already meet the periodic monitoring requirements for other rules or regulations. For these cases, the monitoring condition was tagged with Rule 3004(a)(4) and the underlying rule(s) for which the condition is fulfilling the monitoring requirement.

A draft Periodic Monitoring Guidance document was published by the AQMD in August 1997. A public consultation was held to solicit public input. The final Periodic Monitoring Guideline

Document was published by the AQMD in November 1997. This guideline was used to establish the periodic monitoring requirements in the Title V permit. In addition, the AQMD used the CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Requirements in SIP (June 24, 1999) for applicable opacity limits, grain loading limits for material handling equipment, and for sulfur content of fuels. Furthermore, the AQMD used the CAPCOA/ARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP for combustion sources (July 2001). These documents are included in Appendix II.

6. Title V Permit Format

The Title V permit comprises eleven sections and two appendices. Each section is devoted to a particular function as summarized below:

Section A **Facility Information**
This section contains operator name, facility location and mailing address. It also lists the name of the responsible official and contact person for the facility. Lastly, this section indicates whether Regulation XXX and RECLAIM apply to the facility.

Section B **RECLAIM Annual Emission Allocation**
This section applies to RECLAIM facilities only and lists NO_x and SO_x allocations for the facility. This facility is subject to both the NO_x and SO_x requirements of RECLAIM.

Section C **Facility Plot Plan**
This section is reserved for the development of the facility plot plan in the future.

Section D **Facility Description and Equipment Specific Conditions**
This section describes equipment at the refinery that has been issued permits to operate. It also includes facility-wide operating conditions, emission limitations, the rules for which the emission limits and permit conditions are derived, and the periodic monitoring requirements as appropriate. The description of the process and equipment is structured in the following manner:

Process
A process is the largest grouping of equipment under the Title V permit, which includes all equipment involved in the making of final product from raw feed. A process can end at an intermediate product if the succeeding process is significantly different.

System
A system is the combination of equipment into a unit which is a logical subsystem of a process. A system can be used to identify individual process lines, or it can separate a long process line into separate functions. The main use of this grouping will be to separate a large process into manageable groups.

Equipment
This column describes equipment contained within a system or a process. It contains information necessary to identify equipment and ensure compliance with rules and regulations such as dimensions of a tank, heat input of a heater, horsepower of an engine. This section also lists the equipment application number (A/N). The A/N is an identification number issued by the AQMD to the application submitted to the AQMD by the applicant for a Permit to Construct or Permit to Operate a piece of equipment. A facility is required to submit a permit application when it plans to install a new piece of equipment, alter an existing piece of equipment, or modify a permit condition. An A/N in the Title V permit changes each time the AQMD approves a new application.

Device Identification (I.D.) Number
Each piece of equipment is assigned a unique I.D. number. When a piece of equipment is modified it retains its existing I.D. number. However, when it is removed from service, the I.D. number is retired and will not be used to identify another piece of equipment at this facility.

Connected to
This column is used to identify air pollution control equipment that is connected to a specific piece of equipment at the refinery.

RECLAIM Source Type/Monitoring Unit
This column is used to identify equipment classification pursuant to the RECLAIM program. The classification of major source, large source and process units are defined in Rule 2012. The equipment classification is assigned to NOx and SOx emission sources subject to RECLAIM. Each classification of equipment is subject to a specific monitoring requirement under RECLAIM.

Emissions and Requirements
This column lists emission limits applicable to each piece of equipment. It also lists the rules for which the limits were derived. If AQMD adopted a rule that has not yet been approved into the State Implementation Plan (SIP), emission limits established by both the SIP-approved and non SIP-approved versions of the rule are included in the permit.

Conditions
This column lists specific permit conditions applicable to the facility, process, system or equipment. A facility level condition applies to the whole facility and is designated by the letter F. The process conditions apply to the entire process and are designated by the letter P. The system conditions apply to the entire system and are designated by the letter S. The equipment (device) level conditions are designated by other letters depending on the category of conditions such as monitoring, recordkeeping, etc. Each permit condition references the law or rule for which the requirements in the condition were derived. If AQMD adopted a

rule that has not yet been approved into the SIP, emission limits established by both the SIP-approved and non SIP-approved versions of the rule are included in the permit. One category of the device level condition is the periodic monitoring condition.

Section E **Administrative Conditions**
This section contains general administrative permit conditions that apply to all facilities. The conditions listed in this section apply to all permitted equipment at the facility unless superseded by other conditions listed elsewhere in the facility permit.

Section F **RECLAIM Monitoring & Source Testing Requirements**
This section contains Monitoring and source testing permit conditions imposed by Regulation XX. It summarizes the monitoring and testing requirements for Major, Large and Process units at RECLAIM facilities.

Section G **RECLAIM Recordkeeping & Reporting Requirements**
This section contains recordkeeping and reporting requirements specified in Regulation XX. It summarizes the recordkeeping and reporting requirements for RECLAIM sources.

Section H **Permit to Construct and Temporary Permit to Operate**
The permit format in this section is the same as described for Section D above. However, equipment listed in this section has not been issued permits to operate, but were issued a permit to construct and/or a temporary permit to operate.

Section I **Compliance Plans & Schedules**
This section lists active compliance plans specified in the SIP-approved rules.

Section J **Air Toxics**
This section lists permit conditions pertaining to NESHAP/MACT requirements.

Section K **Title V Administration**
This section lists the Title V administrative conditions. They are the same for all Title V facilities, except for the list of applicable rules table at the end of the section. The table at the end of the section lists all applicable rules referenced in Section D and H (emission limit and conditions) and any rules that are referenced to the facility. This table also indicates which rules are federally enforceable and which are only enforceable by AQMD.

Appendix A **NOx and SOx Emitting Equipment Exempt from Written Permit Pursuant to Rule 219**
This section lists classes of NOx- and SOx- emitting Rule 219 exempt equipment present at the facility that are subject to RECLAIM.

Appendix B Rule Emission Limits

Some emission limits that are too complex to be listed in the Emissions and Requirements column of Sections D and H are listed in Appendix B of the Title V permit. Emission limits in this appendix are referenced by an emission type "(9)" in the "Emissions and Requirements" column of the permit.

7. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield for any of the equipment at the refinery.

Alternate Operating Scenarios

An alternative operating scenario (AOS) is a set of provisions and conditions in a permit that allow the operator to switch back and forth between alternative modes of operation without submitting an application for a permit revision before each switch. However, each AOS must be evaluated for compliance with AQMD rules and regulations and applicable State and Federal requirements. AOS is addressed in Rule 3005 (j). This facility has not applied for an AOS for any of the equipment at the refinery.

Emissions Trading

This facility is subject to emissions trading requirements under Regulation XX.

Prevention of Significant Deteriorations (PSD) Permits

PSD is a federal program for permitting new and modified sources that emit air pollutants for which the AQMD is classified as in attainment with the National Ambient Air Quality Standards (NAAQS). The facility has not been issued a PSD permit by either the EPA or the AQMD.

EPA New Source Review (NSR) Permits

NSR is a federal program for permitting new and modified sources that emit air pollutants for which the AQMD is classified as in Non-attainment with NAAQS. Before SIP-approval of the AQMD NSR Rule in 1978, EPA issued NSR permits for new construction and/or equipment modifications in the AQMD. A check of the records indicates that there are no NSR permits issued by the EPA for the refinery.

8. Summary of Emissions and Health Risks

Summary of Refinery Criteria Air Pollutant and Toxic Air Contaminant Emissions

This section contains a summary of the Criteria Air Pollutant (CAP) and Toxic Air Contaminant (TAC) emissions for the refinery as reported in the refinery's Annual Emission Report (AER) for fiscal year 2005-2006.

Table 8.1 Criteria Pollutant Emissions (tons/year)
from Annual Reported Emissions for Reporting Fiscal Year 2006 – 2007

Pollutant	Emissions (tons/year)
NOx	25
CO	28
VOC	65
PM	14
SOx	3.6

Table 8.2 Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Year 2006 – 2007

The Following TACs Were Reported	Emissions (lbs/yr)
1,2,4-Trimethylbenzene	53.983
1,3-Butadiene	0.161
Acetaldehyde	3.318
Acrolein	2.626
Ammonia	14877.852
Arsenic	< 0.001
Benzene	1069.427
Cadmium	< 0.001
Chlorine	0.05
Chromium (VI)	< 0.001
Copper	0.001
Diesel engine exhaust, particulate matter	9.38
Ethylbenzene	57.399
Formaldehyde	12.796
Hexane	145.898
Hydrochloric acid	0.052
Lead (inorganic)	0.002
m-Xylene	0.541
Methyl t-butylether	0.226
Manganese	0.001
Mercury	< 0.001
Methanol	0.085
Methyl ethyl ketone	0.007
Naphthalene	0.309
Nickel	0.001
PAHs, total, with components not reported	0.106
Selenium	< 0.001
Styrene	0.015
Toluene	269.995
Xylenes	199.084
o-Xylene	0.188

Health Risk from Toxic Air Contaminants

The Carson refinery is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved on February 9, 2001 with the following risk factors.

Cancer Risk	4.78 in one million
Acute Hazard Index	0.01
Chronic Hazard Index	0.01

9. Compliance History

As noted, the refinery has been in continuous operation since 1952, with the exception of a shutdown period of five years in the 1980's. This refinery has been subject to both self-reporting requirements and AQMD inspections. There have been no citizen complaints filed, one (1) Notice-to-Comply issued, and six (6) Notices-of-Violation have been issued to the Edgington refinery since August 1, 2005. The facility is currently in compliance with all notices. Further information regarding the facility's compliance status is available on the internet under the AQMD's "Facility INformation Detail" database (FIND), at http://www.aqmd.gov/webappl/fim/prog/novnc.aspx?fac_id=800264).

10. Compliance Certification

By virtue of the title V permit application and issuance of this permit, the reporting frequency for compliance certification for the refinery shall be annual.

11. Appendices

In order to minimize printing, all of the following appendices are available on the AQMD website as shown below. In addition, they will be made available on CDs upon request. Please contact the AQMD contact person identified on the public notice for this facility or call Andrew Chew at (909) 396-2493 for assistance in finding the information on the website or to obtain a copy of the CD.

I. Technical Guidance Document For the Title V Permit Program (March 2005, Version 4.0) (http://www.aqmd.gov/titlev/TGD.html)
II. Periodic Monitoring Guidance Documents
   A. AQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997) (http://www.aqmd.gov/titlev/pdf/PeriodicMonitoringGuidelines-97.pdf)
   B. CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999) (http://www.arb.ca.gov/fcaa/tv/tvinfo/pmrec624.pdf)
   C. CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001) (http://www.arb.ca.gov/fcaa/tv/tvinfo/pmrecoms.pdf)

III. Summary Report of Notice of Violations. Further information regarding the facility's compliance status is available on the internet under the AQMD's "Facility INformation Detail" database (FIND, at http://www.aqmd.gov/webappl/fim/prog/novnc.aspx?fac_id=800264).

IV. Variances and Abatement Orders. Further information regarding the facility's compliance status is available on the internet under the AQMD's "Facility INformation Detail" database (FIND, at http://www.aqmd.gov/webappl/fim/prog/hbdisplay.aspx?fac_id=800264).