



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

May 24, 2013  
via electronic submittal

Mr. Gerardo Rios  
Chief, Permits Office  
U.S. EPA, Region IX, Mail Stop AIR-3  
75 Hawthorne St.  
San Francisco, CA 94105

**Subject:** Proposed De Minimis Significant Revision to Title V Facility Permit for BP West Coast Products LLC., Carson Refinery (Facility ID #131003)

Dear Mr. Rios:

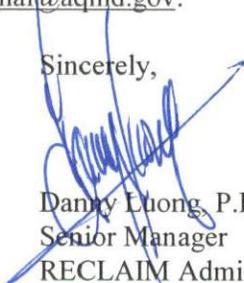
Enclosed for your 45-day review is the proposed revision to the Title V facility permit for BP West Coast Products LLC (BP) located at 2350 E. 223<sup>rd</sup> Street, Carson, California. BP's initial Title V permit was issued on September 1, 2009. The revision proposed under application A/N 516427 is a De Minimis Significant Revision.

The South Coast Air Quality Management District (AQMD) has received applications for Permits to Operate and Permits to Construct from BP for the equipment described in table below. The AQMD has evaluated the applications and has made a preliminary determination that the equipment will operate in compliance with all of the applicable requirements of our rules and regulations. The revised portions of the permit and our evaluation report are attached for your review.

Application No.	Equipment	Application for
491423	Refinery Vapor Recovery System	This modification involves connection of vents from pots in the C4 Alkylation Unit and UOP Merox Treating Unit.
491424	UOP Merox Treating Unit	This modification involves connection of a Foul Air Knockout Pot (RPV 5420) to the Refinery Vapor Recovery System and update of the description for other devices.
493598	C4 Alkylation Unit	The modification consists of venting a new replacement vessel, Merox Foul Air Drip Pot (RPV 6940), to the Refinery Vapor Recovery System. Under this application the permit will also be updated administratively by: addition of three new knockout pots which were installed to replace three previously existing pots, elimination of applicability of Benzene Waste NESHP (40 CFR 61 Subpart FF) to two vessels which are not in Benzene Waste service, and update of the description for other devices.

This letter is being sent to you via email in order to facilitate your review. If you have any questions or wish to provide comments regarding this project, please contact the processing engineer, Mr. Rafik Beshai, at (909) 396-3611 or by email at [rbeshai@aqmd.gov](mailto:rbeshai@aqmd.gov).

Sincerely,



Danny Duong, P.E.  
Senior Manager

RECLAIM Admin., Refinery Permitting  
Retail Gasoline Dispensing

Enclosures

cc w/o enclosures: Eric Daley, Environmental Planning Supervisor (BP)