



# South Coast Air Quality Management District



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

May 22, 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 Significant Revision to Title V Facility Permit for Chevron Products Co., El Segundo Refinery (Facility ID #800030)

Dear Mr Rios: *Yours*

Enclosed for your 45-day review is a proposed significant revision to the Title V facility permit for Chevron Products Company (Chevron) located at 324 West El Segundo Blvd, El Segundo, California. The South Coast Air Quality Management District (SCAQMD) has received applications for permits to construct from Chevron for the equipment modifications described in the table below. The SCAQMD has evaluated the applications and 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.

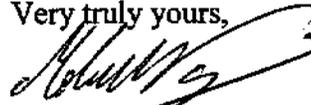
Appl. No.	Equipment	Application for
530643	No. 2 Crude Unit	Installation of piping and associated equipment to connect the discharge of fourteen (14) existing and five (5) spare emergency atmospheric PRVs to the existing Refinery Blowdown Gas Recovery System, which is coupled to the LSFO Flare. The No. 2 Crude Unit will become subject to 40CFR60 Subpart GGGa.
530644	No. 2 Resid Stripper	
530645	Merox Plant	
530648	Waste Gas Compressor Station	
530647	Refinery Blowdown Gas Recovery System	Installation of piping and associated equipment to connect the subject atmospheric PRVs to the Refinery Blowdown Gas Recovery System, which is coupled to the LSFO Flare. Replacement of Relief Drum V-1290 with a larger drum and Knockout Drum V-2500 with a drum of the same dimensions. The LSFO Flare will become subject to 40CFR60 Subpart Ja.
530646	LSFO Flare	

A copy of the public notice, which is issued in accordance with Rules 212(g) and 3006, is also attached. Pursuant to SCAQMD Rule 212 - Standards for Approving Permits and Issuing Public Notice, new or modified sources exceeding any of the specified daily maximums are subject to the public notification and comment provisions of 40 CFR Part 51, Section 51.161(b) and 40 CFR Part 124, Section 124.10. The public notice provides for a 30-day comment period prior to making a final decision on the issuance of the permits. It is being distributed to each address

within a ¼-mile radius of the property line of the facility and published in a newspaper of general circulation in the vicinity of this facility. The notice is also being sent to the California Air Resources Board (CARB), the Southern California Association of Government (SCAG), the County of Los Angeles, the City of Los Angeles, and State and Federal Land Managers.

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. Bob Sanford, at (909) 396-2660 or by email at [bsanford@aqmd.gov](mailto:bsanford@aqmd.gov).

Very truly yours,



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

Enclosures

cc: Dennis Leonard, Chevron Products Company (without enclosures)



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## NOTICE OF INTENT TO ISSUE TITLE V PERMIT "PERMITS-TO-CONSTRUCT" ACCORDING TO SCAQMD RULES 212 AND 3006

This notice is to inform you that the South Coast Air Quality Management District (SCAQMD) has received applications for Permits to Construct and Operate from Chevron Products Company to modify its petroleum refining facility for its Product Reliability and Optimization (PRO) Project to better control its air emissions which may be released into the atmosphere in the City of El Segundo. The SCAQMD is the air pollution control agency for the four county-region including all of Orange County and non-desert portions of Los Angeles, Riverside and San Bernardino counties. Anyone wishing to install, operate or modify equipment that could release or control air pollution within this region must first obtain a permit from the SCAQMD. Rule 212 of SCAQMD requires the applicant for certain projects to distribute a public notice prepared by the SCAQMD prior to the issuance of a permit. This notice is being issued because the maximum potential emissions for the project exceed notification levels specified in Rule 212(g). Since the facility currently has a Title V permit, SCAQMD Rule 3006 also requires publication of a public notice prior to the issuance of a revision to their Title V permit.

The SCAQMD has evaluated the permit applications for the following equipment and determined that the equipment will meet the requirements of all applicable air quality rules and regulations.

**APPLICANT:** Chevron Products Company, El Segundo Refinery (Facility ID No: 800030)

**PROJECT LOCATION:** 324 W El Segundo Blvd., El Segundo, CA 90245

**PROJECT DESCRIPTION:** Reroute of the discharge of several existing emergency pressure relief valves (PRVs) from atmosphere to the Refinery Blowdown Gas Recovery System, which is coupled to one of the refinery flares (LSFO Flare).

Application No.	Equipment	Application Description
530643	No. 2 Crude Unit	Installation of piping and associated equipment to connect the discharge of fourteen (14) existing and five (5) spare emergency atmospheric PRVs to the existing Refinery Blowdown Gas Recovery System, which is coupled to the LSFO Flare.
530644	No. 2 Resid Stripper	
530645	Merox Plant	
530648	Waste Gas Compressor Station	
530647	Refinery Blowdown Gas Recovery System	Installation of piping and associated equipment to connect the subject atmospheric PRVs to the Refinery Blowdown Gas Recovery System, which is coupled to the LSFO Flare. Replacement of Relief Drum V-1290 with a larger drum and Knockout Drum V-2500 with a drum of the same dimensions.
530646	LSFO Flare	

Chevron Products Company operates a petroleum refinery at the above location to produce gasoline, diesel, and other petroleum related products. For safety purposes, certain vessels and equipment located in the No. 2 Crude Unit, No. 2 Resid Stripper, Merox Plant and Waste Gas Compressor Station at the refinery are equipped with PRVs that open to relieve pressure on the vessels and equipment during certain emergency situations caused by equipment malfunctions or process upsets. Some of the existing emergency PRVs in these refinery units would presently discharge relief gases directly to the atmosphere if they were to open. As part of their PRO Project, Chevron proposes to connect the discharge of these emergency atmospheric PRVs to the Refinery Blowdown Gas Recovery System, which is coupled to the LSFO Flare. Connection of the PRVs to a gas recovery system

in conjunction with a flare as proposed by Chevron is considered to be Best Available Control Technology (BACT) for controlling air pollution from the PRVs.

The proposed project is expected to reduce emissions during an emergency by directing relief gases from PRVs to be recovered by the Refinery Blowdown Gas Recovery System or combusted in the LSFO flare. According to SCAQMD's calculations, a maximum potential of 10.3 lb/day of volatile organic compounds (VOCs) may be emitted from the new piping and equipment during normal operation. This amount, even in the worst case, is substantially less than the amount released from one PRV release event. The new piping and equipment will also emit small quantities of some toxic compounds. The SCAQMD has evaluated the short term (acute) and long term (chronic) health impacts associated with the maximum potential emissions of toxic compounds from the new piping and equipment. Using worst case conditions, our evaluation shows that the chronic and acute health risks are both well below our rule's toxic thresholds (below a Hazard Index of 1). According to the state health experts, a hazard index of one or less means that the surrounding community including the most sensitive individuals such as very young children and the elderly will not experience any adverse health impacts due to the toxic nature of these emissions. In addition, the long term cancer risk due to emissions from this equipment complies with the SCAQMD risk thresholds.

The SCAQMD intends to revise the existing Facility Permit (Title V permit) for Chevron's El Segundo Refinery, which includes the permits to construct and operate for the above listed equipment. As required by Title V of the Federal Clean Air Act, the revised Title V permit includes all of the emission limits, applicable requirements and operating conditions imposed on the equipment. The facility is required to certify compliance with the Title V permit in addition to recordkeeping and mandatory reporting of any deviations from the permit conditions.

The air quality analysis and the proposed permit are available for public review during normal business hours at the SCAQMD's headquarters, 21865 Copley Drive, in Diamond Bar, and at the El Segundo Public Library, 111 West Mariposa Ave., El Segundo, CA 90245. A copy of the draft permit can be viewed at [www3.aqmd.gov/webappl/publicnotices2/Search.aspx](http://www3.aqmd.gov/webappl/publicnotices2/Search.aspx) by entering the facility's ID number. Information regarding the facility owner's compliance history submitted to the SCAQMD pursuant to Health and Safety Code Section 42336, or otherwise known to the SCAQMD, based on credible information, is also available for public review at SCAQMD headquarters.

**Anyone wishing to comment on the proposed issuance of the revised permits should submit their comments in writing postmarked no later than July 2nd. Written comments must be submitted to:**

South Coast Air Quality Management District  
Engineering and Compliance  
21865 Copley Drive  
Diamond Bar, CA 91765-4178  
Attention: Mr. Danny Luong, Senior Manager

If you are primarily concerned with zoning decisions and the process by which this facility has been sited at this location, please contact your local city or county planning department. For additional information, or to review the supporting air quality related documents, please contact Mr. Bob Sanford at (909) 396-2660 or [bsanford@aqmd.gov](mailto:bsanford@aqmd.gov).

The public may request the SCAQMD to conduct a public hearing on the proposed Title V permit by submitting a Hearing Request Form (Form 500-G) to Mr. Danny Luong at the above SCAQMD address. The public hearing request must contain all the information requested on the form in order for the SCAQMD to determine whether or not the request is valid or a public hearing will be held. The public hearing forms may be obtained from the SCAQMD by calling the Title V hotline at (909) 396-3013, or downloading from the Internet at <http://www.aqmd.gov/permit/Formspdf/TitleV/AQMDForm500-G.pdf>. Any request for a public hearing must be submitted to the SCAQMD and postmarked no later than June 14th. A copy of the public hearing request must also be sent by first class mail to the facility contact person, Mr. Dennis Leonard,

**Air Regulatory Supervisor, Chevron Products Company, 324 W El Segundo Blvd., El Segundo, CA 90245 at the same time.**

For your general information, anyone experiencing air quality problems such as dust or odors can telephone in a complaint to the SCAQMD by calling 1-800-CUT-SMOG (1-800-288-7664) or file a complaint online at [http://www.aqmd.gov/complain/reporting\\_aq\\_problems.html](http://www.aqmd.gov/complain/reporting_aq_problems.html).