

Table of Contents

Sections

Priority Comments	I
Typographical Errors, Mistakes and Other Corrections	II

Attachments

Sulfur and Ammonia Calculations	A
SIP Approved Versions of BAAQMD Regulations, Prepared by Shell	B
Applicable Sip and BAAQMD Rule Section Clarifications	C
Federal Enforceability of Applicable BAAQMD Requirements	D
Future Effective Dates	E
MACT Subpart UUU – Refinery MACT	F
Regulation 9, Rule 10 Process Heaters in Petroleum Refineries	G
Permit Condition 18265 Implementing Regulation 9, Rule 10.....	H
NSPS Subpart J - Alternative Monitoring	I

SECTION I

PRIORITY COMMENTS

1. Shell Requests Future Effective Dates of 150 days on New Monitoring Requirements or New Interpretation of Existing Requirements

- **Action:** In Section VI, add a future effective date of 150 days from date of issuance to all new monitoring requirements or new interpretations of existing requirements, where time is needed for preparing management of change documents, developing and implementing policies and procedures, preparing logs, installing hardware, training, etc.
- **Justification:** The facility must have adequate time to become familiar with any changes or new requirements, monitoring equipment and procedures. Shell may have to develop and implement policies and procedures for these new or modified requirements and monitoring techniques. Additionally, Shell may have to prepare standard operating procedures and prepare management of change documents.

Shell believes that a minimum of 150 days is necessary to identify all of the changes in the Title V Permit, manage the requirements and develop procedures. This five-month window will enable Shell to be ready to certify compliance or develop a compliance plan before the six-month Monitoring Report is due.

2. Shell Requests that the Incident Report (10 Day Report) and the Monthly Summary (30 Day Report) Not be Required to be Signed by a Responsible Official

- **Action:** Add a general condition in Section I of the Title V Permit that states the following:

The required Incident Report (10 Day Report) and the Monthly Summary (30 Day Report) must be signed by a Responsible Official or representatives designated by the Responsible Official.
- **Justification:** It is not always feasible to have the responsible official physically present to sign these documents at the time of submittal. The responsible official may not always be present and available when all of these small, frequent reports are completed and submitted. Shell requests flexibility to have these reports signed by Shell representatives designated by the Responsible Official. These designees would include, but not be limited, to the Environmental Affairs Department Manager and the Technology and Assurance Manager.

Additionally, the findings of the Incident Report and Monthly Report will generally be incorporated into the Six Month Monitoring Report and the Annual Compliance Certification Reports. The Responsible Official will sign both of these documents.

3. Shell Requests that the Annual Compliance Certification be Submitted and Signed by the Responsible Official with a Subsequent Exception Report Required Annually

- **Action:** Add a general condition in Section I of the Title V Permit that states the following:

The required annual compliance certification shall be in the format of an exceptions report.
- **Justification:** After the initial annual compliance certification, Shell recommends that the Refinery prepare an annual exceptions report. This would represent good time management and paper reduction practices for the District and for the Refinery. A full annual certification report could literally be hundreds of pages and would be cumbersome and inefficient to read and enforce. Exceptions only reporting will allow the District to act more quickly on the information.

4. Add Tank 17095 (S-17095) to Title V

- **Action:** This source is a replacement of Tank 816. Tank 816 has been deleted from the draft Title V Permit, but the new tank has not been added. Consistent with the BAAQMD engineering evaluation, please make the following additions and changes to the permit:
 - Add S17095 to Table II-A. Tank 17095, Custom Made, External Floating Roof, Model NA, Capacity 90,648 bbls.
 - Add S-17095 to Table IV-U.
 - Add a Table in Section IV to reference Condition 20042 for S17095 – Tank 17095.
 - Add Condition 20042 to Section VI. Also, the current language of condition 20042 references S2467 (Tank 12467). The source ID for Tank 12467 is actually S2013. However, all references (Part 1 and Part 3) to S2013 – Tank 12467 should be removed from this condition, in accordance with discussions between Shell and the BAAQMD in November of 2002.
 - Add S17095 – Tank 17095 to Table VII-R External Floating Roof Tanks.
 - Add a Table in Section VII to reference Condition 20042 for S17095 – Tank 17095. The monitoring requirement is Condition 20042 Part 3, throughput records. No special recordkeeping provision is required for the tank construction, since 40 CFR 60 Subpart Kb already requires tank construction details to be retained.
 - Add S17095 – Tank 17095 to Table IX B-3 Permit Shield for Subsumed Requirements.
- **Justification:** Notification of startup of Tank 17095, which replaces Tank 816, was given on 6/24/03. A new permit Condition 20042 has been developed (ATC 5700), but the PTO has not yet been issued. The new throughput of 27,000,000 barrels in any consecutive 12-month period must be added to the Title V Permit or the operations of the tank and the refinery will be impaired.

5. Add Condition 17532 For F-70 (S-1514) That Limits Boiler Emissions

- **Action:** Add Condition 17532 to Section VI of the Title V permit.

The corresponding additions must be made to Table IIA, Section IV, and VII of the Title V.

- **Justification:** ATC No. 07694 was issued on 8/13/03 with a new Condition 17532 that limits boiler emissions. This permit and new condition is required by the Shell-EPA Consent Decree.

6. Correct Typographical Error on Throughput for OPCEN SRU 4 (S-4180) In Condition 18618 Part 1

- **Action:** In Condition 18618 Part 1, the throughput should be stated as **140 long tons/day** rather than **140 equivalent long tons/day**.
- **Justification:** It is probably a mistake or typographical error in the draft Title V permit, but if it isn't corrected, Shell will be unable to operate at our current rates in compliance. The design process capacity as documented to the BAAQMD for this unit is listed in units of long tons/day. The units of equivalent long tons/day are sometimes used to permit sulfur plants. However, for this sulfur plant, the throughput is limited with a permitted throughput in units of long tons/day.

7. Correct Error in Table II A for Capacity of Gas Turbines and Duct Burners

- **Action:** In Table II A, make the following changes:
 - S4190 UTIL Boiler 6 Gas Turbine 1 capacity is 548 MMBtu/Hr
 - S4191 UTIL Boiler 6 Supplemental Steam Generator 1 capacity is 258 MMBtu/Hr
 - S4192 UTIL Boiler 6 Gas Turbine 2 capacity is 548 MMBtu/Hr
 - S4193 UTIL Boiler 6 Supplemental Steam Generator 2 capacity is 258 MMBtu/Hr
- **Justification:** It is probably a mistake or typographical error in the draft Title V permit, but if it isn't corrected, Shell will be unable to operate at our current rates in compliance. These capacities listed above are the design capacities of these turbines and burners. In the March 2002 draft Title V Permit, Condition 18618 Part 1 listed the correct capacities for the gas turbines and duct burners. In the latest draft of the Title V Permit, these sources have been removed from Condition 18618 Part 1. The gas turbine and duct burner capacities in Table II A have never been corrected.

8. Add Standby Diesel Engines to Title V Permit

- **Action:** For each permitted standby diesel engine, add source numbers and capacities to Table II A and add existing permit conditions to Section VI. Establish new tables in Section VI and VII for the standby diesel engines. Permit conditions associated with the District's toxics policy are not federally enforceable and should not be listed as such.
- **Justification:** Operation of the standby diesel engines is imperative for the safe operation of the refinery. These sources must be included in the Title V Permit.

9. Source Testing Cannot be Used to Demonstrate Compliance with Regulation 9-1-313.2

- **Action:** In Section VI, delete Condition 18618 Part 10 which requires source testing to demonstrate compliance with Regulation 9-1-313.2 (sulfur/ammonia removal and recovery). Additionally, remove Condition 18618 Part 10 from Table IV-AQ and in Table VII-AH change monitoring from Condition 18618 Part 10 to “None”.
- **Justification:** Condition 18618 Part 10 requires source testing to demonstrate compliance with Regulation 9-1-313.2. Source testing to determine the efficiency of sulfur/ammonia removal and recovery on a refinery wide basis is impractical and unnecessary.

The refinery’s sulfur/ammonia removal and recovery system includes five fuel gas treaters, four DEA strippers, five sour water strippers, four sulfur recovery plants, and a Flexigas treater. Source testing of the refinery’s sulfur/ammonia removal and recovery system would require an enormous exercise because of the large number of components and because multiple inlet and outlet testing would be required at multiple locations throughout the refinery. A minimum of 33 tests would be required in triplicate resulting in at least 99 individual tests.

It is extremely unlikely that the required standard could be exceeded based on the inherent design of Shell’s sulfur/ammonia removal and recovery system. Sulfur and ammonia mass balances were previously submitted and are resubmitted with this comment letter as Appendix A. These balances confirm that this monitoring is not warranted because allowable emissions are at least an order of magnitude below the required standard. Mass balance calculations document the following:

- The calculated sulfur removal and recovery efficiency of 99.5 percent is significantly better the required efficiency 95 percent. In terms of allowable emissions (0.5 percent versus 5 percent), Shell’s sulfur recovery system achieves an emissions level that is 10 times lower than required by the regulation. The difference between 95 percent and 99.5 percent removal efficiency is an order of magnitude better than required.
- The calculated ammonia removal efficiency of 99.9 percent is significantly better the required efficiency 95 percent. In terms of allowable emissions (0.1 percent versus 5 percent), Shell’s ammonia removal system achieves an emissions level that is 50 times lower than required by the regulation. The difference between 95 percent and 99.9 percent removal efficiency is more than an order of magnitude better than required.

Additionally, Regulation 9-1-313.2 is an old out-dated standard that is not very stringent in comparison to newer standards that apply to the refinery. Prior to any exceedance of Regulation 9-1-313.2, the refinery would exceed standards for fuel gas, heaters, sulfur plants and ambient SO₂.

10. Source Testing Is Not Necessary for OPCEN Sulfur Plant 4’s (SRU-4) (S-4180) Sour Water Strippers

- **Action:** In Section VI, delete Condition 12271 Part 115 which requires source testing to demonstrate compliance with Condition 12271 Part 64 (sulfur/ammonia removal and recovery). Additionally, in Table VII-CF, change monitoring from Condition 12271 Part 115 to “None”. Condition 12271 Part 115 does not need to be removed from Table IV-DF because it was never added.
- **Justification:** Same as for Comment No. 9 (above).

11. Flare Condition 20747 Is Unnecessary and Contradicts NSPS Recordkeeping Requirements

- **Action:** In Section VI, delete Condition 20747 Parts 1 and 2 regarding non-applicability of NSPS Subpart J and recordkeeping for flares. Additionally, delete the corresponding citations in Sections IV and VII (Tables IV-AXa and VII-AO).
- **Justification:** Condition 20747 Part 1 is unnecessary because the flares (S4201, A101, A102, and A103) only burn process upset gases or fuel gas that is released to it as a result of relief valve leakage or other emergency malfunctions. As a result, the flares are exempt from NSPS Subpart J (40 CFR 60.104(a)(1)).

There is no precedence in the Title V program to include rule exemptions or to establish a monitoring requirements for demonstration of exempt status. In Title V Permits issued to date, the BAAQMD has consistently omitted listing exemption citations as applicable requirements (i.e. exemption criteria are not listed as applicable requirements). Inclusion of this exemption citation is contradictory to the BAAQMD’s practice.

Condition 20747 Part 2 requires recording all flaring events. There is no basis for this recordkeeping either for compliance with the rule or to demonstrate the exempt status of the flares.

12. Delete Flow Monitoring and Visible Emissions Monitoring Requirements for Flares in Condition 18618 Parts 12 and 13 and Replace them with Appropriate Visible Emissions Monitoring

- **Action:** In Section VI, delete Condition 18618 Parts 12 and 13 which require that flow meters be installed on each flare, inappropriate visible emissions monitoring, and recordkeeping. Additionally, delete the corresponding citations in Sections IV and VII. Incorporate new conditions for appropriate visible emissions monitoring of the flares and recordkeeping as outlined in Comment Nos. 13 through 16 (below).
- **Justification:** BAAQMD Regulation 12-11 will require that flow meters be installed on certain types of flares (not all flares at the facility will be subject to flow monitoring). It is inappropriate to require that flow meters be installed on all of the flares. Additionally the flow meter installation requirements contained in Condition 18618 Parts 12 and 13 are redundant to requirements in Regulation 12-11 (which have a future effective date).

The visible emissions monitoring required by Condition 18618 Part 12 is not appropriate. It is not feasible to “continuously monitor the flare as long as flaring occurs using EPA Method 9”. Additionally, some flares, which are used as control devices to burn “clean gases” such as propane and Flexigas do not warrant the same level of monitoring as for flares that are used for process upsets. A simpler and more reasonable approach to ensure compliance is needed.

Proposed visible emissions monitoring for each flare is presented in Comment Nos. 13 through 16 (below). A listing of each flare, the flare service, and recommended visible emissions monitoring methodologies is presented in the following table:

Flare	Flare Service	Recommended Monitoring
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Flare	Flare Service	Recommended Monitoring
LOP Auxiliary Flare (S-1471)	Process Upset Gases	See Comment 13
LOP Main Flare (S-1472)	Process Upsets Gases	See Comment 13
OPCEN Hydrocarbon Flare (S-1772)	Process Upsets Gases	See Comment 13
DC Clean Fuels Flare (S-4201)	Process Upsets Gases	See Comment 13
LOG LPG Loading Flare (S-1470)	Routine use –Propane Service	See Comment 14
Tank Vapor Recovery System Flares (A-101, A-102 and A-103)	Flares for Vapor Recovery Systems Backup	See Comment 15
OPCEN Flexigas Flare (S-1471).	Routine Use – Flexigas Service	See Comment 16

13. Add Appropriate Monitoring Requirements for Flares that Handle “Process Upset” Gases to Demonstrate Compliance with Visible Emissions Limits

- **Action:** Add a new permit condition to the following flares. These flares do not combust gases routinely. They are safety flares that combust process upset gases:

S-1471 LOP Auxiliary Flare
S-1472 LOP Main Flare
S-1772 OPCEN Hydrocarbon Flare
S-4201 DC Clean Fuels Flare

For the listed flares, add a permit condition in Section VI with the following language:

- 1) Assume compliance with visible emission standard if flow to the flare does not exceed 330 SCFM for 15 consecutive minutes.
- 2) If flow does exceed 330 SCFM for 15 consecutive minutes, and the operator can determine there are no visible emissions using video monitoring, no further monitoring is required.
- 3) If further monitoring is required, conduct a visible emissions inspection. Visible emissions inspections shall be repeated every 30 minutes unless (1) the flaring event continues in a steady and stable state where it can be reasonably assured that smoking would not occur if it had not been previously observed or (2) video monitor rules out visible emissions.
 - a) If visible inspection detects visible smoke emissions as defined in EPA Method 22 in excess of 5 continuous minutes, visible emissions shall be reported as a Title V instance of non-compliance.
 - b) EPA Method 9 may be used as an alternative method to determine compliance with the visible emission standard.
- 5) Visible inspections shall be documented on log made available to BAAQMD.

Additionally, add the corresponding changes to the appropriate tables in Sections IV and VII.

In Section VI, also add a future effective date for this new monitoring condition of 150 days from date of issuance, because time is needed to prepare management of change documents, develop and implement policies and procedures, prepare logs, and provide training, etc.

- **Justification:** Continuous monitoring of a flaring event is not feasible. This approach will enable the facility to focus on corrective actions and more efficiently use personnel during a flaring event.

14. Visible Emissions Monitoring is not Required for LOG LPG Loading Flare (S-1470)

- **Action:** For S-1470, delete all references to Condition 18618 Parts 12 and 13. In Section VII, change monitoring requirements for BAAQMD Regulation 6-301 to “None”.
- **Justification:** The LOG LPG Loading Flare is a clean service flare that controls POC emissions during propane loading. The combustion occurring in this source is similar to that occurring in furnaces firing exclusively gaseous fuels, such as natural gas. No monitoring is required for sources that burn gaseous fuel exclusively per the EPA’s June 24, 1999 agreement with CAPCOA and ARB titled “Summary of Periodic Monitoring Recommendation for Generally Applicable Requirements in SIP”. The likelihood of visible emissions from the combustion of “clean” propane is negligible. No visible emissions monitoring or recordkeeping is required to demonstrate compliance with BAAQMD Regulation 6-301.

15. Visible Emissions Monitoring is not Required for the Flares that Service the Tank Vapor Recovery System (A-101, A-102 and A-103)

- **Action:** For A-101, A-102 and A-103, delete all references to Condition 18618 Parts 12 and 13. In Section VII, change monitoring requirements for BAAQMD Regulation 6-301 to “None”.
- **Justification:** Each flare is a backup control device for one of the Tank Vapor Recovery Systems, which fugitive emissions from control organic liquid storage vessels. These flares are only used during malfunction of the vapor recovery systems (typically less than 1 week per year per flare). The combustion occurring in this source is similar to that occurring in furnaces firing exclusively gaseous fuels, such as natural gas. No monitoring is required for sources that burn gaseous fuel exclusively per the EPA’s June 24, 1999 agreement with CAPCOA and ARB titled “Summary of Periodic Monitoring Recommendation for Generally Applicable Requirements in SIP”. The likelihood of visible emissions from the combustion of tank vapors is negligible. No visible emissions monitoring or recordkeeping is required to demonstrate compliance with BAAQMD Regulation 6-301.
- **Alternative Action:** Although unacceptable to Shell, the following action is requested if the BAAQMD chooses to require visible emission monitoring for the flares that service the tank vapor recovery system.

Delete Condition 18618 Part 12 and 13 as they pertain to A-101, A-102 and A-103.
Replace the condition with the following:

A visible emissions check will be conducted annually, if the flare is operated. If any visible emissions are detected the operator shall take corrective action, and check for visible emissions after corrective action is taken. If visible emissions are still present, the owner/operator may use EPA Reference method 9 to verify compliance with the 20 percent opacity standard. [Basis: Regulation 2-6-409.2]

In Section VI, add a future effective date of 150 days from date of issuance, because time is needed to prepare management of change documents, develop and implement policies and procedures, prepare logs and provide training, etc.

- **Alternative Justification:** Shell’s experience has shown that these flares do not exceed the visible emissions standard. However, if the District does require monitoring, an annual visible emissions check is adequate, if the flare operates during a year.

16. Visible Emissions Monitoring is not Required for OPCEN Flexigas Flare (S-1471)

- **Action:** For S-1471, delete all references to Condition 18618 Parts 12 and 13. In Section VII, change monitoring requirements for BAAQMD Regulation 6-301 to “None”.

- **Justification:** The OPCEN Flexigas Flare burns only flexigas. Flexigas is a low heating value (Btu) gas that has minimal hydrocarbons (less than 2 percent methane and 1 percent non-methane hydrocarbons, by volume). Flexigas is used as a low-NO_x fuel gas in heaters throughout the refinery. It has an extremely consistent and stable composition. When the flare is in operation, it operates continuously. The flow rate can vary to a degree (not nearly as significant as process upset flares) but the gas quality is such that the variability in flow does not increase the likelihood of visible emissions.

The combustion occurring in this source is similar to that occurring in furnaces firing exclusively gaseous fuels, such as natural gas. No monitoring is required for sources that burn gaseous fuel exclusively per the EPA's June 24, 1999 agreement with CAPCOA and ARB titled "Summary of Periodic Monitoring Recommendation for Generally Applicable Requirements in SIP". The likelihood of visible emissions from combustion of clean Flexigas is negligible. No visible emissions monitoring or recordkeeping is required to demonstrate compliance with BAAQMD Regulation 6-301.

- **Alternative Action:** Although unacceptable to Shell, the following action is requested if the BAAQMD chooses to require visible emission monitoring for OPCEN Flexigas Flare.

Delete Condition 18618 Part 12 and 13 as they pertain to S-1759. Replace the condition with the following:

A visible emissions check will be conducted during startup of OPCEN Flexicoker (S-1759). If any visible emissions are detected the operator shall take corrective action, and check for visible emissions after corrective action is taken. If visible emissions are still present, the owner/operator may use EPA Reference method 9 to verify compliance with the 20 percent opacity standard. [Basis: Regulation 2-6-409.2]

In Section VI, add a future effective date of 150 days from date of issuance, because time is needed to prepare management of change documents, develop and implement policies and procedures, prepare logs and provide training, etc.

- **Alternative Justification:** Shell's experience has shown that this flare does not exceed the visible emissions standard, even during startup. However, if the District does require monitoring, the only time there would be any potential for visible emissions would be during startup of the OPCEN Flexicoker (S-1759).

17. Ammonia Source Testing is Not Required for Refinery Heaters

- **Action:** In Section VI, delete Condition 12271 Parts 111 and 112, which require ammonia source testing for refinery heaters that utilize selective catalytic reduction. Additionally, delete references to Condition 12271 Parts 111 and 112 and Section IV and in Section VII change monitoring from Condition 12271 Parts 111 and 112 to "None".
- **Justification:** Ammonia limits are not federally enforceable since they are based on the BAAQMD's toxics requirements. Ammonia is not a criteria pollutant and is not considered a Hazardous Air Pollutant (HAP) by the EPA. Under the Title V program, the BAAQMD has authority to require additional monitoring and recordkeeping if it is needed to demonstrate compliance with federally enforceable requirements. However, this authority does not extend to non-federally enforceable requirements. When ammonia limits were established by the BAAQMD for various sources, initial compliance testing was deemed sufficient to ensure compliance.

It is not appropriate to change this requirement under the Title V program. In the BAAQMD Consolidated Responses to Comments on Refinery Title V Permits dated July 25, 2003, page 66, includes a response that concurs that the ammonia limit on steam heaters and boilers is a state-only requirement, and is not subject to Title V compliance monitoring requirements. Therefore, the ammonia source testing requirements should be eliminated.

18. Delete the Process Unit Startup and Shutdown Notification Requirement (Condition 18618 Part 11)

- **Action:** In Section VI, delete Condition 18618 Part 11 which requires District notification for the startup and shutdown of Shell's six major process units. Additionally, delete the reference to Condition 18618 Part 11 in Table IV-DV.
- **Justification:** There is no regulatory basis for adding this process unit startup and shutdown notification requirement in the Title V Permit. The Title V process allows the BAAQMD to add monitoring (including recordkeeping and reporting) conditions when they are necessary to demonstrate compliance with emission limits and standards required by existing regulations, permit conditions, or other federally enforceable requirements. The notification requirements specified by Condition 18618 Part 11 are not used to verify or demonstrate compliance with any existing regulations, permit conditions or other federally enforceable requirements. In fact, Condition 18618 Part 11 is not listed in any Section VII table as a method for compliance monitoring. Shell is also concerned that the District may not keep the process unit startup and shutdown notifications confidential. If this information is released, Shell's competitors can take advantage of Shell's non-operation to maximize market share.
- **Alternative Action:** Although unacceptable to Shell, if the BAAQMD chooses not delete Condition 18618 Part 11, the following changes are requested:
 - Modify the line that states "Notification will be made by telephone using the District's 24-hour notification telephone line" to read:

"Notification will be made by telephone using the District's 24-hour notification telephone line, the Contra Costa County Community Warning System, or other agreed upon method."
 - In Section VI, all add a future effective date of 150 days from date of issuance, because time is needed to prepare management of change documents, develop and implement policies and procedures, prepare logs and provide training, etc.

- **Alternative Justification:** Contra Costa County also requires notification for the six major process units listed in Condition 18618 Part 11. Therefore, Shell would like the flexibility to use the Contra Costa Community Warning System or other future agreed upon method of notification. This will keep the current notification system streamlined. Two separate notification procedures would be confusing and inefficient.
- **Do not Add to Condition 18618 Part 11 by Requiring District Notification for the Startup and Shutdown of All “Process Units”.** There is no regulatory authority or basis for the District to require this notification.

However, Shell does not object to notifying the District of startup and shutdown of the six major process units.

Shell has over 400 sources and 40 process units. However, the six major process units identified in this condition are the ones that may have a potential to cause upsets that might, under certain circumstances, lead to flaring or excess emissions. Notification for all process units from Shell alone would overwhelm the District. Some process units such as sulfonation and blending systems often startup and shutdown more than once a day depending on product demand.

The process units that are not identified by Condition 18618 Part 11 are miscellaneous support units and generally include,

- Hydrotreaters
- Fuel gas treaters
- Blending Systems
- Hydrogen Plants
- Minor Hydrocarbon Processing Units such as the CGDP and ISOM

These miscellaneous support units generally have no potential for flaring or excess emissions during startup and shutdown. There is no justification for requiring District notification for these support units.

19. Remove Requirement for “District Approved Log”

- **Action:** Remove the phrase “District approved” from the following permit conditions:
 - Condition 6110 Part 3
 - Condition 6111 Part 4
 - Condition 6707 Part 4
 - Condition 11313 Part 7
 - Condition 11806 Part 7
 - Condition 18153 Part 4
 - Condition 18618 Part 2 and 4
 - Condition 18646 Part 4
 - Condition 20398 Part 4
 - Condition 20747 Part 2
 - Condition 20762 Part 2
- **Justification:** Various conditions include a requirement to keep records in a “District approved log”. It seems unnecessary to have the BAAQMD approve recordkeeping format because the required records are specifically identifies by the various permit conditions. Additionally, the BAAQMD does

not have a formal program for approving recordkeeping format. Therefore, we recommend that the phrase “District approved” be deleted from the above listed permit conditions.

The District has asserted that their verbal approval is implied on all logs that have been shown to District enforcement inspectors. This verbal approval is not deemed sufficient to Shell.

20. Eliminate Tank Condition (Condition 20762) which is Redundant to BAAQMD Regulation 8-5-117 Rule Exemption

- **Action:** In Section VI, delete Condition 20762 Parts 1 and 2. Additionally, delete the corresponding citations in Sections IV and VII (Tables IV-DV and VII-CY).
- **Justification:** Condition 20762 Parts 1 and 2 is unnecessary and redundant to BAAQMD Regulation 8-5-117. There is no precedence in the Title V program to include rule exemptions or to establish a monitoring requirements for demonstration of exempt status. There is no precedence in the Title V program to include rule exemptions or to establish a monitoring requirements for demonstration of exempt status. In Title V Permits issued to date, the BAAQMD has consistently omitted listing exemption citations as applicable requirements (i.e. exemption criteria are not listed as applicable requirements). Inclusion of this exemption citation is contradictory to the BAAQMD’s practice.

Shell acknowledges that they have the burden of proof for this exemption and have procedures in place to ensure that products with vapor pressures above the exemption are not put in the tank. However, the District should not add monitoring conditions for exempt sources in the Title V document. Additionally, Table 1 of BAAQMD Regulation 8-5 is not applicable for many products at a refinery and Lab Method 28 is not accurate for tanks storing very low vapor pressure material. The refinery uses other more effective ASTM methods to ensure that they are not in violation of BAAQMD Regulation 2-1-301 and 302.

21. Clarify that Table II-A Capacities are Listed for Only Descriptive Purposes

- **Action:** At the beginning of Table II-A, delete the sentence that states, “The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and 2-1-301.” Replace this text with the following, “The capacity column is for descriptive purposes only, specific throughput limits for various sources are listed in Section VI of this permit.” It must be clear that the capacities listed in Table II-A are not federally enforceable limits.
- **Justification:** The capacities listed in Table 2-A have been derived from PTO descriptions. This is problematical for some sources, especially tanks. Tanks may have both physical capacity and working capacities. This is historically (and continues) to be confusing. Some permits may have recorded physical capacity and some working capacity. Additionally, the permits may have errors in tank dimensions. In Section VI, Permit Condition 16888 Part 1 limits the maximum firing rate of each heater and Permit Condition 18618 Part 1 limits the maximum throughputs for many sources including most tanks. There are also many other permit conditions listing in Section VI that include specific throughput limits for various sources that were permitted under the BAAQMD’s NSR program.

22. Clarify that Throughput Limits Listed in Condition 16688 Part 1 and Condition 18618 Part 1 are not Federally Enforceable Limits

Action: In each Section IV and VII Table that lists Condition 16688 Part 1 and Condition 18618 Part 1, ensure that the “Federal Enforceable” column is consistently marked with a “N”. Ensure that the language regarding exceedance of the throughput limits in both Standard Condition I.J and Condition 18618 Part 1 are also

referenced for Condition 16688 Part 1 or that Condition 16688 Part 1 limits moved to and Condition 18618 Part 1.

- **Justification:** There is no regulatory basis for inclusion of the throughput limits listed in both Condition 16688 Part 1 and Condition 18618 Part 1. Both of these permit conditions list BAAQMD Regulation 2-1-234.3, 2-1-307, and/or 2-1-403 as the regulatory basis. A careful reading of these regulations does not provide any justification for adding throughput limits to emissions units that are “grandfathered” or were issued NSR permits without specific throughput limits.

According to the BAAQMD, the purpose of the throughput limits listed in the two permit conditions is to facilitate a determination of whether a modification has occurred as defined in Regulation 2-1-234.3 (the definition of modification). The follow permit conditions verify this point.

- Language in Standard Condition I.J states that exceedance of the throughput limits does not establish a presumption that a modification has occurred, nor does compliance with the limit establish a presumption that a modification has not occurred.
- Language in Condition 18618 Part 1 states that exceedance of the throughput limits for which Regulation 2-1-234.4 was the identified basis are not a violation of the permit if the operator can, within 60 days, provide documentation demonstrating the throughput limit should be higher, established in accordance with 2-1-234.3, and the excess throughput complies with the new limit.

For “grandfathered” sources and source that were issued NSR permits without throughput limits, if the BAAQMD proposes to use “non-permitted” throughput limits to help determine if a modification has occurred, these limits cannot be federally enforceable. There is no possible basis for the limits being federally enforceable. Additionally, the Title V process cannot be used to add new federally enforceable limits except for monitoring (recordkeeping and reporting) when needed to demonstrate compliance with existing limits.

23. Correct SIP Rules and Federal Enforceability.

- **Action:** Review entire permit for errors with respect to SIP rules and federal enforceability. The current Title V Permit has a significant number of errors with respect to SIP rules and federal enforceability. Attachment B provides a listing of BAAQMD rules, adoption dates, date of SIP approved rules, SIP “gaps”, and the federal enforceability. Attachment B was previously submitted to the BAAQMD on July 2003, but has been updated for this submittal (disregard the July 2003 submittal). Use Attachment B to correct the many errors in the current draft Title V Permit with respect to SIP rules and federal enforceability.

Attachment C presents some, but not all of the corrections required in the Section IV tables for clarifying SIP and BAAQMD rule citations. Attachment D presents some, but not all, errors and omissions regarding federal enforceability.

- **Justification:** There may be errors throughout the Title V Permit regarding SIP requirements and federal enforceability. These should be corrected for compliance enforcement reasons.

24. Correct Future Effective Dates

- **Action:** Search permit for future effective dates that have already past. Delete these dates. Some, but not of these corrections are identified in Attachment E.

- **Justification:** The future effective date should not be listed if the date has already passed. These errors should be corrected.

25. Delete Condition 18643 Part 7 is Redundant to NSPS Requirement

- **Action:** In Section VI, delete Condition 18643 Part 7. Also delete any references to Condition 18643 Part 7 in the Section IV and VII tables.
- **Justification:** Condition 18643 Part 7 requires that “all” process sample systems in the DSU and GCH be closed loop. This requirement is not correct because it should only apply to sample systems used to sample VOC containing materials not “all” materials. Additionally, the requirement for VOC containing materials is redundant to NSPS Subpart VV (40 CFR 60.482-5).

26. Delete Condition 20620 Parts 1 and 2 Future MACT Subpart UUU Requirements

- **Action:** In Section VI, delete Condition 20762 Parts 1 and 2 for MACT Subpart UUU requirements. Add specific MACT Subpart UUU requirements as they pertain to Shell with future effective dates. Appendix F provides a detailed description of modification needed to incorporate MACT Subpart UUU requirements into the Title V Permit.
- **Justification:** Condition 20620 Part 1 requires Shell to submit a complete application by April 11, 2004, for a significant revision to the Title V Permit to incorporate the limits, compliance options, and monitoring requirements in MACT Subpart UUU. Shell has already prepared this information and does not wish to make a significant revision to the Title V Permit once it is issued.

27. Add a Future Effective Date of 150 Days to All New Source Testing Required by the Title V Permit

- **Action:** In Section VI, add future effective dates of 150 days to all source testing required in the Title V Permit. This includes, but is not limited to the following permit conditions:
 - Condition 12271 Parts 104 through 115
 - Condition 18618 Part Parts 8, 9 and 10
- **Justification:** The District is proposing to add many new source tests to the Title V Permits for all the Bay Area refineries. Some of these tests may be new and unfamiliar to the District and local source testing firms. The permits will be issued at the same time; therefore, all of the refineries’ source tests will be due at the same time. This is going to create an overload for the District and the BAAQMD source test firms. Scheduling may become a serious issue at the same time every year. Future effective dates of 150 days will allow time to prepare and schedule testing with local firms and should result in staggered due dates for source tests.

28. Review and Correct Section VIII Test Methods

- **Action:** Once all monitoring conditions are correctly identified in Section VII, Section VIII should be reviewed again to ensure that the referenced test methods are correct.
- **Justification:** Shell believes that there are errors in the stated test methods.

29. Incorporate Changes Regarding a New Version of BAAQMD Regulations 9-10

- **Action:** In the Sections IV and VII tables, incorporate the changes specified in Appendix G regarding BAAQMD Regulation 9-10.
- **Justification:** BAAQMD Regulation 9-10 was amended on July 17, 2002. The current version of the draft Title V Permit includes some sections that no longer apply (they were deleted in the rule change or are initial requirements that have been completed).

30. Incorporate Changes Regarding Corrections to Permit Condition 18265 Parts through 11

- **Action:** In the Sections IV and VII tables and in Section VI, incorporate the changes specified in Appendix H regarding Condition 18256 Parts 1 through 11.
- **Justification:** Permit Condition 18265 Parts 1 through 11 pertains to compliance with BAAQMD Regulation 9-10. This condition was first included in the PTO on August 1, 2002 and was not included in the last version of the draft Title V Permit. In this most recent draft of the Title V Permit, this condition was added. However, the condition has a number of significant errors which need to be corrected. Some of the errors include incorrect monitoring citations for some units.

31. Incorporate Changes Regarding Alternative Monitoring Requirements for NSPS Subpart J

- **Action:** In the Sections IV and VII tables, incorporate the changes specified in Appendix I regarding alternative monitoring for NSPS Subpart J.
- **Justification:** For a number of sources, Shell utilizes alternative monitoring provisions for NSPS Subpart J. The use of this alternative monitoring is allowed under 40 CFR 60.13(i) and has been specifically authorized by the EPA for certain sources at Shell.

32. Ensure that Source Testing Requirements are Consistent

- **Action:** Make sure that new source testing requirements include the following language: “The results of the source test shall be made available to the District within 60 days of the source test and kept for a minimum of 5 years from the date of the report.” and “The frequency of source testing required under this condition shall be reduced to once every five years if three consecutive

annual source tests document that emissions are less than 50 percent of the standard. The frequency of source testing shall revert back to once per year, if a source test documents that emissions are 50 percent of the standard or more. The source testing frequency can again be reduced to once every five years if another three consecutive annual source tests document that emissions are less than 50 percent of the standard.”

- **Justification:** Source testing firms often take more than 30 days to submit source test results, especially if multiple tests are conducted within a short period of time. Since Shell has little control over the timeliness of source testing firms, we request that the 30-day period for submittal of source test results be extended to 60 days. The required frequency of source testing should have some relationship between operating emission levels and permitted emissions levels. If a source consistently demonstrates that emissions are less than 50 percent of the emissions standard, the frequency of source testing should be reduced.

SECTION II

TYPOGRAPHICAL ERRORS, MISTAKES AND OTHER CORRECTIONS

- A. Sulfur Recovery System
- B. Flares
- C. Other Combustion Sources
- D. Cooling Water Towers
- E. Tanks
- F. Process Units
- G. Paint Booths and Solvent Use
- H. Miscellaneous Sources
- I. All Sources

A. Sulfur Recovery System

- 15. Modify The Language In Condition 12271, Part 64, Sour Water Strippers.** The word “remove” should be added because the facility does not recover ammonia. Part 64 should read:
The **Sour Water Strippers** shall remove/recover at least 95% (by weight) of the H₂S and remove 95% (by weight) of the ammonia from the sour water feed to the unit; or reduce the concentration of NH₃ to no more than 50 ppm and the concentration of H₂S to no more than 25 ppm in the stripped water. This condition shall not apply during periods of startup and shutdown.
- 16. Modify The Language In Condition 12271, Part 64 Sour Water Strippers.** Delete the last line, which states, “The startup and shutdown exemption in this Condition does not exclude the owner/operator from complying with the refinery-wide 95% recovery requirement in Regulation 9-1-312.2.” This is redundant to BAAQMD 9-1-313.2.
- 17. Correct Table VII- CF.** Condition 12271, Part 64 is listed twice and is out of numerical order.
- 18. In Table VII-AH For The Sulfur Plants, For BAAQMD 9-1-313.2, Delete Monitoring Citation, Frequency And Type, And Replace Each With None.** Note that Condition 18618, Part 10 is also deleted per discussion in Section I Priority Comments of this submittal letter.
- 19. Delete BAAQMD Regulation 6 Requirements From Sulfur Pit.** The BAAQMD Consolidated Responses to Comments on Refinery Title V Permits dated July 25, 2003, page 43, states that Table IV-DE has been corrected to only include those requirements that actually apply to the Sulfur Pit. As a result, all of these requirements except for Condition # 12271 Part 63 and Condition # 18618 Parts 1 and 2 have been deleted. However, in the new draft, Table IV-DE still includes BAAQMD Regulation 6 requirements, which do not apply to the fixed roof molten sulfur tank, which is vented to the SCOT thermal oxidizer.
- 20. Clarify Part 63 For The Sulfur Pit In Table IV-DE.** Add a line that says Condition 12271 before the line that says Part 63. This will clarify the permit condition with which the part is associated.
- 21. Delete Condition 12271, Part 63 From Table IV-DF For S4180 - SRU4 Because It Applies To The Sulfur Pit/Storage Tanks And Not The Sulfur Recovery Operations.**
- 22. Delete S1431 - SRU1 And S1432 - SRU2 From Section IV Table IV-AR.** S1765 - SRU3 is the only sulfur plant subject to the Condition 7618 bubble requirements.
- 23. Delete S1431 - SRU1 And S1432 - SRU2 From Section VII Table VII-AI.** S1765 - SRU3 is the only sulfur plant subject to the Condition 7618 bubble requirements.
- 24. In Table VII – AH: Delete 40 CFR 60 105(E)(4) From The Monitoring Requirements For The Subpart J SO₂ Limit.** It is a definition of the limit and not a monitoring requirement. Delete 60.106(a) and (f)(1) performance testing requirements because they have been completed. The only ongoing monitoring requirements are the SO₂ and O₂ monitors.

25. **On Table VII-CF For S4080, Change The CO, NH3, And H2S Monitoring Frequency From “P/A” To “P” For Condition 12271, Parts 109, 110, And 115.** These permit conditions provide an allowance for a decrease in source testing frequency for results that are less than 50% of the standard, therefore, since it is subject to change in the future, the frequency cannot be specified in the Title V permit. (Note that some of these conditions may be deleted per discussion in Section I Priority Comments of this letter).

B. Flares

1. **Exemption For 6-401.** Per 6-401, gas fired combustion sources subject to BAAQMD 6-301, 6-303, and 6-304 are exempt from 6-401, including flares. BAAQMD 6-401 should be deleted from the following Table IVs:
 - IV-AW – S1470/LOG LPG Loading Flare
 - IV-AXa – A101, A102, A103/Flares for Vine Hill, Crude String, and Interim Gasoline Vapor Recovery Systems
 - IV-AXb – S1471/LOP Auxiliary Flare, S1472/LOP Main Flare
 - IV-BW – S1771/OPCEN Flexigas Flare, S1772/OPCEN Hydrocarbon Flare
2. **Delete 6-305 From Flares And Other Gas-Fired Only Combustion Devices.** Since they are gas-fired combustion devices, it is not likely that they will emit visible particles large enough to fall on property other than Shell Martinez Refinery. This requirement is not applicable to similar combustion sources in other Bay Area refinery permits. Delete BAAQMD 6-305 from the following Table IVs:
 - IV-AW
 - IV-AXa
 - IV-AXb
 - IV-AZ
 - IV-BC
 - IV-BD
 - IV-BZ
 - IV-CS
 - IV-CU
3. **Delete Visible Emission Inspections To Demonstrate Compliance With Grain Loading.** In Tables VII-AN, AO, BH, BI and BJ. Condition 18618, Part 12 for visible emissions inspections should be deleted as the monitoring requirement for the 6-310 FP limit. It is not feasible to demonstrate compliance with a particulate grain loading limit using visible inspections. Replace Condition 18618, Parts 12 with None.
4. **In Table VII-AN, The Alternative Monitoring Method Under 60.13(I) For S1470 - LOG LPG Loading Flare Is Not Continuous.** Change the frequency to periodic.
5. **In Table VII-AN For S1470 – LOG LPG Loading Flare, Monitoring For BAAQMD 6-301 And 6-310 Should Be None.** These flares have a very low probability for visible emissions and grain loading exceedences per the discussion in Section I Priority Comments of this submittal letter.
6. **In Section IX, add a new permit shield for the following sources:**
 - S1470 - LOP LPG Loading Flare
 - A101 - Flare For Vine Hill Vapor Recovery System
 - A102 - Flare For Crude String Vapor Recovery System
 - A103 - Flare For Interim Gasoline Vapor Recovery SystemThese sources are exempt from BAAQMD Regulation 12 Rule 11, in accordance with BAAQMD 12-11-110. The permit shield should state that the sources are not subject to BAAQMD Regulation 12 Rule 11.
7. **Delete S4201 - DC Clean Fuels Flare From Table IV-AXa And Table VII-AO Because S4201 Does Not Have The Same Requirements As A101 Through A103 Vapor Recovery System Flares.** The vapor recovery system flares are exempt from BAAQMD Regulation 12 Rule 11, in accordance with BAAQMD 12-11-110. S4201 – DC Clean Fuels Flare is subject to some parts of BAAQMD Regulation 12 Rule 11. The requirements for S4201 can go into Tables IV-CX and VII-CI.

8. In Table IV-CX, Add The Following BAAQMD 12-11 Requirements For The S4201 - DC Clean Fuels Flare:

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-310	Particulate Weight Limitation	Y	
BAAQMD Regulation 12-11	Flare Monitoring at Petroleum Refineries (06/04/03)		
12-11-401	Flare Data Reporting Requirements	N	
12-11-402	Flow Verification Report	N	6/4/04
12-11-501	Vent Gas Flow Monitoring	N	12/4/04
12-11-502	Vent Gas Composition Monitoring	N	
12-11-502.3	Vent Gas Composition Monitoring	N	03/4/04
12-11-503	Pilot Monitoring	N	
12-11-504	Pilot and Purge Gas Monitoring	N	
12-11-505	Recordkeeping Requirements	N	
12-11-506	General Monitoring Requirements	N	
12-11-506.1	Periods of Inoperation of Vent Gas Monitoring	N	09/4/04
12-11-507	Video Monitoring	N	12/4/03

9. In Table VII-CI, add the following requirements For S4201 - DC Clean Fuels Flare:

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD 6-301	Y		Ringelmann No. 1 for no more than 3 minutes/hour	BAAQMD Condition # 18618 Part 12	P/E	Visible Emissions Check
FP	BAAQMD 6-310	Y		0.15 grain per dscf at 6% O ₂	None	N	None

- In monitoring requirements, the new flare visible emission condition should be referenced. Verify that this new condition will be Condition 18618 Part 12.
 - Do not add BAAQMD Regulation 12 Rule 11 requirements in Section VII because the rule does not have a numeric limit. Only numeric limits belong in Section VII.
10. Correct Requirements For A101 Through A103 – Vapor Recovery System Flares. In Table IV-AXa for A101 through A103:
- Monitoring for BAAQMD 6-301 and 6-310 should be none. These flares have a very low probability for visible emissions and grain loading exceedences per the discussion in Section I Priority Comments of this submittal letter.
 - Delete all BAAQMD 12-11 requirements. The vapor recovery system flares are exempt from BAAQMD Regulation 12 Rule 11, in accordance with BAAQMD 12-11-110. There is no need to cite the exemption, since this would be inconsistent with the remainder of the document.

- Delete NSPS 40 CFR 60 Subpart J requirements. These flares are exempt from the standard in 60.104(a)(1). There is no need to cite the exemption in Section IV, since this would be inconsistent with the remainder of the document. This exemption is appropriately included in Table IX A-12 as a Permit Shield for Non-applicable Requirements.
 - Delete Condition 20747, as discussed in Section I Priority Comments.
- 11. Delete S1471 - LOP Auxiliary Flare And S1472 - LOP Main Flare From Table VII-AO And Rename The Table VII-AOa.** These flares have different requirements from A101 through A103 – Vapor Recovery System Flares. Put A101 through A103 in Table VII-AOa and put S1471 and S1472 in a new Table VII-AOb.
- 12. Correct Section VII Requirements For A101 Through A103 – Vapor Recovery System Flares.** In Table VII-AOa:
- Delete NSPS 40 CFR 60 Subpart J requirements. These flares are exempt from the standard in 60.104(a)(1). There is no need to cite the exemption in Section IV, since this would be inconsistent with the remainder of the document. This exemption is appropriately included in Table IX A-12 as a Permit Shield for Non-applicable Requirements.
 - Delete Condition 20747, as discussed in Section I Priority Comments of this submittal letter.
 - Delete BAAQMD Regulation 12 Rule 11 requirements in Section VII because the rule does not have a numeric limit. Only numeric limits belong in Section VII.
- 13. In Table IV-AXb, Add The Following Requirements For The LOP Auxiliary Flare (S-1471) And The LOP Main Flare (S-1472):**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 12-11	Flare Monitoring at Petroleum Refineries (06/04/03)		
12-11-401	Flare Data Reporting Requirements	N	
12-11-402	Flow Verification Report	N	6/4/04
12-11-501	Vent Gas Flow Monitoring	N	12/4/04
12-11-502	Vent Gas Composition Monitoring	N	
12-11-502.3	Vent Gas Composition Monitoring	N	03/4/04
12-11-503	Pilot Monitoring	N	
12-11-504	Pilot and Purge Gas Monitoring	N	
12-11-505	Recordkeeping Requirements	N	
12-11-506	General Monitoring Requirements	N	
12-11-506.1	Periods of Inoperation of Vent Gas Monitoring	N	09/4/04
12-11-507	Video Monitoring	N	12/4/03

- 14. In The New Table VII-AOb, Add The Following Requirements For S1471 - LOP Auxilliary Flare And S1472 - LOP Main Flare:**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD 6-301	Y		Ringelmann No. 1 for no more than 3 minutes/hour	BAAQMD Condition # 18618 Part 12	P/E	Visible Emissions Check
FP	BAAQMD 6-310	Y		0.15 grain per dscf at 6% O ₂	None	N	None

- **The new flare visible emission condition should be referenced. Verify that this new condition will be Condition 18618 Part 12.**
- Do not add BAAQMD Regulation 12 Rule 11 requirements in Section VII because the rule does not have a numeric limit. Only numeric limits belong in Section VII.

15. In Section VI, On The Permit Condition 7618 List Of Applicable Sources, Add S1771 – OPCEN Flexigas Flare And Delete S1772 – OPCEN Hydrocarbon Flare. Condition 7618 has requirements for S1771, but not S1772.

16. In Section IX, Add A New Permit Shield For S1771 - Flexigas Flare. This source has a limited exemption under BAAQMD 12-11-114. The shield should state that the source is not subject to the following monitoring and reporting:

BAAQMD 12-11-401.2

- BAAQMD 12-11-401.3
- BAAQMD 12-11-401.5
- BAAQMD 12-11-502.2
- BAAQMD 12-11-502.3

17. In Table IV-BXa For The S1771 - Flexigas Flare, Add The Following Requirements From BAAQMD Regulation 12, Rule11:

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 12-11	Flare Monitoring at Petroleum Refineries (06/04/03)		
12-11-114	Limited Exemption, Total Hydrocarbon and Methane Composition Monitoring and Reporting	N	
12-11-401	Flare Data Reporting Requirements	N	
12-11-401.1	Total Volumetric Flow		
12-11-401.4	If molecular weight measured, report average molecular weight for each hour of the month.	N	
12-11-401.6	Report any 24-hour period during which more than 1 million standard cubic feet of vent gas was flared.	N	
12-11-401.7	Report flare monitoring downtimes	N	
12-11-401.8	Report archive of images recorded for month pursuant to Section 12-11-507.		12/4/03
12-11-401.9	For each day and for the month provide calculate methane, non-methane and sulfur dioxide emissions. A flare control efficiency of 93 percent shall be used for flexi-gas flares	N	
12-11-402	Flow Verification Report	N	6/4/04
12-11-501	Vent Gas Flow Monitoring	N	12/4/04
12-11-502	Vent Gas Composition Monitoring	N	
12-11-502.1	Vent Gas Composition Monitoring	N	
12-11-503	Pilot Monitoring	N	
12-11-504	Pilot and Purge Gas Monitoring	N	
12-11-505	Recordkeeping Requirements	N	
12-11-506	General Monitoring Requirements	N	

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
12-11-506.1	Periods of Inoperation of Vent Gas Monitoring	N	09/4/04
12-11-507	Video Monitoring	N	12/4/03

18. In Table VII-BH, delete the BAAQMD Regulation 6 Requirements. The monitoring will be different for the S-1771 - OPCEN Flexigas Flare and the S-1772 OPCEN Hydrocarbon Flare. Therefore the BAAQMD Regulation 6 requirements should go in Table VII-BI and VII-BJ, respectively.

19. In Table VII-BI, change the Regulation 6 monitoring requirements to none because the Flexigas Flare Has a Low Probability of Visible Emissions as Discussed in Section I Priority Comments.

20. Add a new Table IV-BXb, with the following requirements for the OPCEN S1772 - Hydrocarbon Flare:

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 12-11	Flare Monitoring at Petroleum Refineries (06/04/03)		
12-11-401	Flare Data Reporting Requirements	N	
12-11-402	Flow Verification Report	N	6/4/04
12-11-501	Vent Gas Flow Monitoring	N	12/4/04
12-11-502	Vent Gas Composition Monitoring	N	
12-11-502.3	Vent Gas Composition Monitoring	N	03/4/04
12-11-503	Pilot Monitoring	N	
12-11-504	Pilot and Purge Gas Monitoring	N	
12-11-505	Recordkeeping Requirements	N	
12-11-506	General Monitoring Requirements	N	
12-11-506.1	Periods of Inoperation of Vent Gas Monitoring	N	09/4/04
12-11-507	Video Monitoring	N	12/4/03

21. In Table VII-BJ, for S1772 OPCEN Hydrocarbon Flare

- **The new flare visible emission condition should be referenced. Verify that this new condition will be Condition 18618 Part 12. If so, no change is required.**
- Do not add BAAQMD Regulation 12 Rule 11 requirements in Section VII because the rule does not have a numeric limit. Only numeric limits belong in Section VII.

C. Other Combustion Sources

1. **Renumber Condition 7382, Parts 3, 4 and 5.** Condition 7382, Parts 1, 2, and 3 (which apply to S1005) were correctly reinstated into Section VI. However, in Condition 7382, the Parts for S1072 were incorrectly re-numbered from 1, 2 and 3 to 3, 24, and 5. Correctly renumber them to 4, 5, and 6.

2. **BAAQMD Imposed Ammonia Limits And Monitoring Are Not Federally Enforceable.** Ammonia limits and monitoring are not federally enforceable since they are based on the BAAQMD's toxics requirements. Ammonia is not a criteria pollutant and is not considered a Hazardous Air Pollutant (HAP) by the EPA. All Conditions developed by the BAAQMD that limit ammonia or require ammonia monitoring should be designated as "not federally enforceable" in both Sections IV and VII. Section IV tables have been corrected. Condition 12271, Parts 26, 31 and 37 should have a "N" in the Federally Enforceable column of tables in Section VII.
3. **Add A Future Effective Date On Condition 18618, Part 3.** This new condition requires a visible emissions check when using liquid fuel. Add a future effective date of 150 days from date of issuance, because time is needed to prepare management of change documents, develop and implement policies and procedures, prepare logs and provide training, etc.
4. **Add A Future Effective Date On Condition 18618, Part 4.** This new condition requires a sulfur testing of liquid fuel, when using liquid fuel. Add a future effective date of 150 days from date of issuance, because time is needed to prepare management of change documents, develop and implement policies and procedures, prepare logs, and provide training, etc.
5. **Add A Future Effective Date On Condition 18618, Part 6.** This new condition requires a visible emissions check during exterior tube cleaning of heaters or boilers. Add a future effective date of 150 days from date of issuance, because time is needed to prepare management of change documents, develop and implement policies and procedures, prepare logs, and provide training, etc.
6. **If Subject To BAAQMD 9-1-304 Liquid Fuel Sulfur Content Limitations, The Source Is Also Subject To BAAQMD 9-1-502.** Add BAAQMD 9-1-502 "Continuous Emissions Monitoring If Required by APCO" to the following sources:
 - IV-AY
 - IV-BA
 - IV-BG
 - IV-BK
 - IV-BL
7. **Delete BAAQMD 9-1-502 From Table IV-BD Because These Heaters Are Permitted For Natural Gas Firing Only.** BAAQMD 9-1-502 is applicable only for sources subject to 9-1-304, 9-1-307, 9-1-309, or 9-1-310. The heaters and furnaces listed on Table IV-BD are not subject to any of these BAAQMD Regulation 9, Rule 1 requirements.
8. **Delete 6-302 Requirement For Opacity Limitation On Table IV-BL For S1514 UTIL F-70, Boiler 4.** The 20% opacity limitation of 6-302 applies only where an opacity monitor is required by BAAQMD regulations. This source is not subject to any BAAQMD opacity monitor requirements. Further, the continuous opacity monitoring requirement is incorrectly referenced in Table VII-BB as the compliance demonstration method for 6-302 citing 6-501, 6-502, and 1-522 as the continuous opacity monitoring requirement. It appears that the opacity monitoring required by Subpart J for the CO boilers/FCCU exhaust stream were misinterpreted for this source. The entire row for 6-302 should be deleted from Table VII-BB for S1514.
9. **Determine Whether S1514 – UTIL F-70 Boiler 4 Is Still Permitted To Burn Fuel Oil.** Before adding Condition 17532 to Section VI, review whether there is a regulatory basis for prohibiting this source from burning fuel oil (Part 1). Shell believes that the source is still permitted to burn fuel oil. If the source cannot burn fuel oil, then changes are required throughout the Title V Permit. The source would need to be deleted from the introduction to Table II A, which lists the sources that can burn fuel oil. References to Regulation 9-1-304, 9-1-502, and all conditions pertaining to analysis and visible emissions from fuel oil would need to be deleted in Section IV, VI and VII.
10. **Delete Condition 17532 Part 2 Because It Is A Start-up Condition That Has Been Completed.** The new Condition 17532 for S1514 – UTIL F-70 Boiler 4 has not been incorporated into the draft Title V. Before incorporating this condition, delete Part 2 which is a start-up condition.
11. **Add BAAQMD 6-304 Tube Cleaning to Table IV-CW for the UTIL Boiler 6 Supplemental Steam Generator (S-4191) and UTIL Boiler 6 Supplemental Steam Generator (S-4193).**
12. **Add BAAQMD 6-304 Tube Cleaning to Table VII-CH for the UTIL Boiler 6 Supplemental Steam Generator (S-4191) and UTIL Boiler 6 Supplemental Steam Generator (S-4193).** Compliance will be demonstrated with a visible emissions check per Condition 18618 Part 6. The frequency will be P/E.

13. **Add (S-4191) and UTIL Boiler 6 Supplemental Steam Generator (S-4193) to Condition 18618 Part 6 For Visible Emissions Check During External Tube Cleaning.**
14. **Delete Condition 12271, Part 94 from Table IV-BK.** The initial source testing has been completed and the Condition has been deleted in Section VI.
15. **Change basis of Condition 17533, Part 8 in Table IV-BK from “offsets” to “toxics” for consistency with permit condition language in Section VI.**
16. **Delete Condition 18618, Part 6 From Table IV-CV For The Cogen Turbines, S4190 and S4192.** The cogen turbines are not subject to this condition for visible emissions monitoring during tube cleaning.
17. **Delete Visible Emission Inspections To Demonstrate Compliance With Grain Loading.** On Tables VII-AP, AR, AX, BB and CH. Condition 18618, Parts 3 and 7 for visible emissions inspections after 1 MM gallon fuel combusted should be deleted as the monitoring requirement for the 6-310.3 FP limit. It is not feasible to demonstrate compliance with a particulate grain loading limit using visible inspections. Replace Condition 18618, Parts 3 and 7 with None.
18. **On Table VII-CB For S4021 And S4171, Change The CO And NO_x Monitoring Frequency From “P/A” To “P” For Condition 12271, Parts 104 And 106 To Accommodate The Different Source Testing Frequencies For The Two Sources.** S4021 is semi-annual, whereas S4171 is annual. Furthermore, both permit conditions provide an allowance for a decrease in source testing frequency for results that are less than 50% of the standard, therefore, since it is subject to change in the future, the frequency cannot be specified in the Title V permit.
19. **On Table VII-BY For S4002 And S4003, Change The CO And NH₃ Monitoring Frequency From “P/A” To “P” For Condition 12271, Parts 105 And 111.** Both of these permit conditions provide an allowance for a decrease in source testing frequency for results that are less than 50% of the standard, therefore, since it is subject to change in the future, the frequency cannot be specified in the Title V permit.
20. **On Table VII-CD For S4031 And S4141, Change The CO And NH₃ Monitoring Frequency From “P/A” To “P” For Condition 12271, Parts 105 And 111.** Both of these permit conditions provide an allowance for a decrease in source testing frequency for results that are less than 50% of the standard, therefore, since it is subject to change in the future, the frequency cannot be specified in the Title V permit.
21. **On Table VII-CE For S4161, Change The CO Monitoring Frequency From “P/A” To “P” For Condition 12271, Part 107.** Both of these permit conditions provide an allowance for a decrease in source testing frequency for results that are less than 50% of the standard, therefore, since it is subject to change in the future, the frequency cannot be specified in the Title V permit.
22. **On Table VII-CE For S4161, Change The Monitoring Type For The Subpart J SO₂ Limit And Monitoring Under 60.105(A)(4) From “Monitoring, Records, And Reporting” To “H₂S Analyzer”.**
23. **On Table VII-CG For S4190 And S4192, And On Table VII-CH For S4191 And S4193, Change The CO And VOC Monitoring Frequency From “P/A” To “P” For Condition 12271, Parts 108 And 114.** Both of these permit conditions provide an allowance for a decrease in source testing frequency for results that are less than 50% of the standard, therefore, since it is subject to change in the future, the frequency cannot be specified in the Title V permit.
24. **Add Applicable Condition 12271 Requirements To Table IV-BK For CO Boilers (S1507, S1509, S1512).** Add Condition 12271, Parts J and K (for CEMS), L and M (for records/reporting), 18, 19, 20, 21, 22, and 23 (for fuel gas).
25. **On Table VII-BA For S1507, S1509, and S1512, Change The NH₃ Monitoring Frequency From “P/A” To “P” For Condition 17533, Part 8.** This permit condition provides an allowance for a decrease in source testing frequency for results that are less than 50% of the standard, therefore, since it is subject to change in the future, the frequency cannot be specified in the Title V permit.
26. **Add Condition 16688, Part 1 To The Following Tables IV-AY (S1476, S1477) And IV-BZ (S1800).**
27. **Correct Or Delete Condition 17533, Part 15.** This part inappropriately references Permit #26876. Either the Condition 17533 Part 15 should include the requirement or it should be deleted. This deletion should be made throughout the document.
28. **Add Condition 18618, Part 2 To Table IV-BG.** All sources in this table should show applicability to Condition 18618, Part 2.

29. **In Table IV-BJ, Delete Condition 16688, Part 1 Because It Is Already Shown On Table IV-BD For These Sources.**
30. **On Table IV-CO, Add BAAQMD 6-301 And 6-310.3 Because These Requirements Apply To This Small Gas-Fired Unit.** The monitoring requirements are already included for these citations in Table VII-BX.
31. **Condition 7618, Part E.1 Is Redundant With BAAQMD 9-1-304.** Therefore, the row for the 7618, Part E.1 SO₂ limit should be deleted from the following tables: VII-AP, AR, AY, BA, and BB Check all tables for additional entries that should be deleted..
32. **If Condition 7618, Part E.1 Is Not Deleted, On Tables VII-AR And VII-AY For The SO₂ Limit Of Condition 7618, Part E.1, Change The Monitoring Frequency For Condition 18618, Part 4 From “P/M” To “P10⁶ Gallon Of Fuel Combusted”.** This is the monitoring method and frequency specified by Condition 18618, Part 4.
33. **If Condition 7618, Part E.1 Is Not Deleted, On Tables VII-AP, VII-BA, And VII-BB For The SO₂ Limit Of Condition 7618, Part E.1, Change The Monitoring Requirement Citation To 18618, Part 4 Because It Requires Sampling To Confirm Liquid Fuel Sulfur Content.** Use of 7618, Part G is an inappropriate method because it only requires recordkeeping.
34. **Add A Permit Shield For The 9-1-502 Requirements For Continuous Monitoring Under 1-522.** The 9-1-502 requirements appear to be superceeded by Condition 18618, Part 4 for the following sources: S1476, S1477,.. Note that a previous comment suggested the addition of 9-1-502 for completeness in Section IV applicability.
35. **In Table VII-BL For The S1800 F-88 Boiler, Delete The Rows For The SO₂ Limits For Condition 7618, Part C.E And Part E.1.** This source is not permitted for liquid-fuel firing.
36. **In Table VII-CC For S4021 And S4171, Delete The Row For The BAAQMD 6-301 Opacity Limit Because It Is Redundant With The Same Requirement On Table VII-CB For These Two Sources.** It appears that Table VII-CC can be deleted since 6-301 was the only monitoring requirement.
37. **In Table VII-AP, Correct The Spelling Of Sampling.** Change sampline to sampling. This is a typo.
38. **Add S1507 UTIL CO Boiler 1 to Section VI Condition 18618 Part 1.** This source has been omitted from the Condition. There are no other throughput conditions for this source. S1507 throughput should be the same as S1509 and S1512. This is a daily limit of 5568 MMBtu/day and an annual limit of the daily times 365 days.

D. Cooling Water Tower

1. **In Table II A, Delete The Capacities For S1457 and S1778 (CWT-50) And Replace With NA.** The recirculation rate in gallons per hour is not a capacity.
2. **Cooling Water Tower Hydrocarbon Monitor.** Condition 12271 Part 55 requires installation of a hydrocarbon monitor. This is a start-up condition, which should be deleted. If not deleted then the wording of the condition should be modified to describe the operation.
3. **Cooling Water Tower Process Weight Rate.** Table VII-AJ for the cooling water towers includes BAAQMD 6-311, which limits particulate emissions based on process weight rate. This rule does not apply to cooling towers and should be deleted from this table. Note that this requirement does not appear in the corresponding Section IV tables, so no change is required in Section IV. (Still debating this one.)
4. **Delete BAAQMD 8-2-301 Requirements From Tables IV-AS, CY and Table VII-AJ.** Cooling towers at Shell are exempted by Rule 8-2-114. “Emissions from cooling towers...are exempt from this Rule, provided best modern practices are used.” Shell described its cooling water tower practices in an application provided to BAAQMD in May 2003. Shell notes that the BAAQMD engineering evaluation dated May 29, 2003, does not address the specific exemption for cooling towers in Rule 8-2-114.

E. Tanks (Including Waste Water)

1. **Delete –S1141 Tank 1141 From Condition 18618 Part 1 In Section VI.** This tank is subject to a throughput limit in Condition 20398. It should not have a limit in Condition 18618. Delete the tank from Table IV-B and Table VII-A.
2. **Add NSPS Kb Record Keeping Requirements to Table Ca.** Tank 4307 is subject to 40 CFR 60.116b(a) and (b) recordkeeping only, due to vapor pressure. (Previous comment IV-45).
3. **Delete NSPS Subpart Kb Requirement for Flare in Table AEa.** Table IV-AEa cites 40 CFR 60.112b(a)(3)(ii) requirement for 95% control for Tank Sources S1114 and S1115. These tanks do not utilize a flare as a control device. Delete the reference to 40 CFR 60.112b(a)(3)(ii).
4. **Delete Table IV-AG and Table VII-AA for S1116 - Tank 1116 Fresh Acid.** This sulfuric acid tank does not emit particulates or acid mist. In Table IV-AG, delete 6-301 as the basis for the concentration limit on the acid. Also delete all Regulation 6 requirements
5. **Correct typo error in Condition 7618 D.1.** Condition 7618 D.1. should show Tank 1336 (S1757) rather than Tank 1336 (S1756).
6. **Correct typo error in Table IV – Y.** 61.357(fd) should be 61.357(f).
7. **Correct typo error in Table IV – AK.** 61.351(a)(2) should reference 40CFR60.112b(a)(1) rather than 112b(2)(1). Also need to change 61.357(d) to 61.357(f).
8. **Delete Table IV-Ka.** There are no requirements other than the reference to Table IV-J. Rename Table “Kb” to “K”, and change “See Table IV-J and Ka...” to “See Table Jb...”
9. **Delete Table IV-L.** There are no requirements other than the reference to Table IV-I.
10. **Change supplemental reference in Table IV-N, O, P.** Change “See Table IV-J and K...” to “See Table IV-Ja...”
11. **Delete Table IV-T.** There are no requirements other than the reference to Table IV-R.
12. **Delete Table IV-V.** There are no requirements other than the reference to Table IV-U.
13. **Change supplemental reference in Table IV-W.** Change “See Table IV-U & V...” to “See Table IV-U...”. Change “See Table IV-R & T & CO...” to “See Table IV-R & CN...”. Change “See Table IV-R & W & DC...” to “See Table IV-R & DB...”
14. **Change supplemental reference in Table IV-AA.** Change “See Table IV-E & G for ...” to “See Table IV-Ea for...”
15. **Delete Table IV-AD.** There are no requirements other than the reference to Table IV-AC.
16. **Change supplemental reference in Table IV-AJ.** Change “See Table IV-J & K...” to “See Table IV-Ja...”. Change “See Table IV-U & V” to “See Table IV-Jb...”.
17. **Delete Table IV-DC.** There are no requirements other than the reference to Table IV-DA.
18. **Delete Table IV-DH.** There are no requirements other than the reference to Table IV-DG..
19. **Correct Typo in Table VII – CM Header.** Fix run-on into source S4311.
20. **Correct Table VII -- Ya references for S13.** S13 is listed in Table VII-C with a reference to Table Ya for additional requirements. There is no Ya. S13 is now listed in Table X. Change the Table C reference to “Ya” to “X”.
21. **Condition 7133.** Add S1050 - Tank 1050 to the Table Header.
22. **Correct Typo in Tables VII-X and CO,** from Monitoring Citation “63.64(d)(5)” to “63.640(d)(5).”
23. **Correct Monitoring Frequency in Table VII-CG.** For condition 60.333(b), change frequency code from “P” to “P/E (upon transfer to storage tank from another source).”
24. **Correct Monitoring Frequency in Table VII-CA.** For Condition #12271, Part 11, change “P” to “P/A”.
25. **Delete Table VII-CN.** There are no requirements other than the reference to Table VII-CL.
26. **Delete Table VII-CP.** There are no requirements other than the reference to Table VII-CN.
27. **Clarify Emission Calculation Procedures in Condition 12771 Part A.** The second paragraph in Part A reads
“Emissions shall be calculated in accordance with the emission calculation procedures used in this permit application, and summarized in Appendix B...”
Replace the reference to the application and Appendix B with the actual procedure.
28. **Condition 12271, Part 55.** The citation for Part 55 is missing due to the deletion of Part 54 wherein the basis text is combined with the paragraph for Part 55. Separate these paragraphs and provide citation for Part 55.
29. **Changes related to revised Rule 8-5.**

- **Limited exemptions.** Add limited exemptions Rule 8-5-111 (Tank Removal From and Return to Service) and 8-5-112 (Tanks in Operation -- maintenance and inspection) to all Tank Tables subject to Rule 8-5.
 - **Table IV-Ea, Ec, M, AEa, AEb, AEc, DG.** Delete 8-5-304, 320, 321, 322, 401, and 405. These tanks are fixed roof, and these rules apply to tanks with floating roofs. Delete 8-5-307, only methane and nitrogen are used for blanketing. Change 8-5-501 to 8-5-501.1, since 501.2 applies to floating roof tanks.
 - **Table IV-I, DJ.** Delete 8-5-304, 305, 320, 321, 322, 401, 402, and 405. These tanks are fixed roof, and these rules apply to tanks with floating roofs. Delete 8-5-307, only nitrogen is used for blanketing. Change 8-5-501 to 8-5-501.1, since 501.2 applies to floating roof tanks.
 - **Table IV-Ja, Jb, Jc, U, Y, AC.** Delete 8-5-302, 303, 307 and 403. These rules do not apply to external floating roof tanks. Delete Rule 8-5-306 Requirements for Approved Emissions Control Systems, since there is no control system for these tanks, other than the tank design.
 - **Table IV-R.** Delete 8-5-302, 303, 306, and 403. These rules do not apply to internal floating roof tanks. Delete 8-5-307, only methane and nitrogen are used for blanketing.
 - **Table IV-AH.** Delete 8-5-320, 321, 322, and 405. These tanks are fixed roof, and these rules apply to tanks with floating roofs. Change 8-5-501 to 8-5-501.1, since 501.2 applies to floating roof tanks. Delete 8-5-307, only methane and nitrogen are used for blanketing.
 - **Table IV-AK.** Delete 8-5-302, 303, 304, 306, 401, 403, which apply to external floating roof tanks, and add 8-5-305, 402, which apply to internal floating roof tanks. Delete 8-5-307, only methane and nitrogen are used for blanketing.
 - **Table VII changes.** There remain several references to 8-5-404.3 in Section VII tables including Y, CM, CQ. Change 8-5-404.3 to 8-5-404. Also change Table Y references to 8-5-311 to 8-5-306.
 - **Table VII-I, J.** Change references to 8-5-328.1 to 8-5-328.1.1 and 8-5-328.1.2 for the TVP and control requirements, respectively. Change the monitoring citation for 8-5-328.1.1 from 8-5-501 to 8-5-501.1. These are external floating roof tanks. Accordingly, add requirement 8-5-401.1, seal inspections, with monitoring requirement citation 8-5-501.2, records.
 - **Table VII-P.** Change references to 8-5-328.1 to 8-5-328.1.1 and 8-5-328.1.2 for the TVP and control requirements, respectively. Change the monitoring citation for 8-5-328.1.1 from 8-5-501 to 8-5-501.1. These are internal floating roof tanks. Accordingly, add requirement 8-5-402, seal and fitting inspections, with monitoring requirement citation 8-5-501.2, records.
30. **Delete monitoring requirements pertaining to Condition 6707 Part 2.b.i and ii from Table VII-BW.** Monitoring should say none. Since the POC and toxics emissions were originally evaluated based on worst case conditions at the allowable throughput, the POC emissions and toxics emissions inherently will not exceed the requirements of Part 2.b.i and ii.
 31. **Delete monitoring requirements pertaining to Condition 18646 Part 2.b.i and ii from Table VII-F.** Monitoring should say none. Since the POC and toxics emissions were originally evaluated based on worst case conditions at the allowable throughput, the POC emissions and toxics emissions inherently will not exceed the requirements of Part 2.b.i and ii.
 32. **Correct Internal Floating Roof Requirements in Table IX B-2 Permit Shield for Subsumed Requirements.** Citation 60.115b(b) should be changed to 60.115b(a) Reporting and Recordkeeping Requirements for IFRTs (not EFRTs).
 33. **Delete Table IV-L.** There are no requirements other than the reference to Table IV-I.

F. Process Units

1. **In Section VI, Permit Condition 18618 Part 1, The Annual Limit For S1428 CP Catalytic Feed Hydrotreater (CFH) Should Be Corrected To 19,856,000 Bbl/Yr Rather Than Bbl/Day.** This is a typo.
2. **On Table VII-CA, Correct The Condition 12271, Part 11 VOC Emission Limit From “19.3 Tpy” To “193.5 Tpy” And Confirm That The Condition 12271, Part 11 Fugitive Emission Calculations Is A Periodic Requirement.** Condition 12271, Parts L and M require monthly records and emission calculations, but do not list fugitives as a category to be reported. Further Condition 12271, Part 11 clearly states that the fugitive counts be provided within 30 days of unit startup. Assuming that this

unit has been completed, either delete the Condition 12271, Part 11 or modify the monitoring frequency to be P/E (upon unit modification) to indicate the that fugitive count are required only as updates to reflect unit modifications.

3. **Add S1420 To The List Of Sources In VI Condition 7618.** S1420 DH Crude Unit (CU) is subject to the throughput limit in Part C.a. as shown in Table IV-AO.
4. **Delete Table IV-AM.** There are no requirements in this table other than to reference IV-AL. Delete the references to Table IV-AM in Table IV-AO, IV-BQ, IV-CR
5. **Delete “DeSox” From Condition 12911.** This is a mistake.
6. **Modify Table VII – AG For S1426 With The Following Changes:**
 - For the Opacity Limit of Condition 12911, Part 2, change the monitoring frequency from “W” to “E”. The permit condition does not require weekly visible emissions monitoring, rather event driven monitoring (when water seal fails).
 - For the FP limits of 6-310 and 6-311, replace Condition 18618, Part 9 as the monitoring requirement with Condition 12911, Part 3. Condition 18618, Part 9 does not apply directly to this source. It requires source testing of the CO boilers. Instead, Condition 12911, Part 3 requires that the FCCU vent to the CO boilers.
 - Delete 40 CFR 60.106(a) and 60.106(b)(4) performance testing requirements from the monitoring requirement citations for the 6-302 opacity limit. These performance tests have been completed and are not ongoing compliance monitoring methods. The opacity CEM should be the ongoing compliance method with the 60.105 recordkeeping requirements.
 - Delete 40 CFR 60.106(a), (b)(1), (b)(2), (b)(3), and (c) performance testing requirements from the monitoring requirement citations for the 60.102(a)(1) PM standard. These performance tests have been completed and are not ongoing compliance monitoring methods. Delete the “source testing” from the monitoring type. The ongoing compliance method is the 60.105 daily recordkeeping requirements.
 - Delete 40 CFR 60.106(g) and 60.107 performance testing and notification requirements from the monitoring requirement citations for the 60.104(b)(2) SO₂ standard. The initial performance tests and notifications have been completed. The 40 CFR 60.108(d) 24-hr testing requirement should be deleted from Table VII-AG and shielded by 60.106(i)(12) which allows an alternative monitoring method. Confirm that the alternative method is a periodic recordkeeping requirement (what frequency?). 40 CFR 60.106(e) should be deleted from Table VII because it is not a routine monitoring requirement, instead it allows future flexibility to change the compliance standard under 60.104(b).
 - Delete 40 CFR 60.105(e)(2) from the monitoring requirements for the Subpart J CO limit because it is a definition of the limit and not a monitoring requirement. Delete 60.106(d) performance testing requirements because they have been completed. Add “and P/D” to the monitoring frequency for the 60.105© monitoring requirements. The only ongoing monitoring requirements are the CO monitor on the CO boilers and daily recordkeeping.

G. Paint Booths and Solvent Cleaning

1. **In Table IV-CD, Modify Table IV-CD For Parts And Solvent Cleaners (S1900, S1902 And S1903)As Follows:**
 - The description for 8-16-303.5 should be modified since there are several options.
 - The description for Rule 8-16 should be dated 10/16/2002 rather than 9/16/98.
 - The description for 8-16-501.3 should read “monthly” rather than “annual”.
2. **In Table IV-DV and VII-CY, Delete The Requirement For 8-16-122 Because June 3, 2003 Has Passed.**
3. **In Table IV-CB, Make The Following Changes Because BAAQMD 8-4, 8-19 and 8-31 Were Amended On October 16, 2002:**
 - Add 8-4-313.
 - Add 8-4-501.5, record retention
 - Change the description for 8-4-501.4 to monthly usage records.
 - Change the date in the description for 8-4, 8-19 and 8-31 to 10/16/2002.

- Add 8-19-321, Surface Preparation Solvent < 0.42 lb/gal.
 - Add 8-31-321, Surface Preparation Solvent < 0.42 lb/gal
4. **In Table VII-BN, Make The Following Changes Because BAAQMD 8-4, 8-19 and 8-31 Were Amended On October 16, 2002:**
- For the monitoring frequency for 8-4-302, add P/M for VOC content <420 g/l.
 - For the monitoring frequency for citation 8-19-302, add P/M for monthly records of cleanup and surface preparation solvent used.
 - For the monitoring frequency for citations 8-31-302 and 306, add P/M for monthly records of cleanup and surface preparation solvent used.
5. **On Table VII-BP For The Maintenance Degreasers And Cleaners, Delete The “P/E – Visual Inspection” For BAAQMD 8-16-303.4.1 And Replace With None.** There is no basis for the visual inspection.

H. Miscellaneous Sources.

In Table II B, Combine Both Rows For A5115. A5115 (Carbon Adsorption Vessel (ETP 2) has two rows in Table II B. The information in these two rows should be combined in a single row with the Abatement Device number A5115.

In Table II B, Combine Both Rows For A5116. A5116 (Carbon Adsorption Vessel (ETP 2) has two rows in Table II B. The information in these two rows should be combined in a single row with the Abatement Device number A5116.

In Table II B, Delete Row Containing “A” Just After A7. There is a row with only an “A” in the first column and without any information in the rest of the row. Delete this row.

Revised SIP Rule 8-7 11/06/2002. Table IV BO cites Rule 8-7 for Gasoline Dispensing Facilities (11/17/99). A revised Rule 8-7 was approved in the SIP 11/06/2002. Consequently, the following changes are required:

- **Table IV-BO.** Add 8-7-301.13 vapor tightness and testing, 8-7-302.14 back pressure for vapor balance, 8-7-407 periodic testing and 8-7-408 test notification. Delete 8-7-302.11 for vacuum assist Phase II recovery system. Delete all references to SIP 8-7 (6/1/94), since the revised 8-7 (11/06/2002) is now part of the SIP.
- **Table VII-BD.** Add for requirements 8-7-301.6 and 8-7-302.5 the testing requirement in 8-7-301.13. Add for requirement 8-7-302.14 the testing requirements in 8-7-302.14.

Condition 18643, Part 8 Throughput Limits. Condition 18643 appears in the Title V permit, but Part 8 has been deleted and now references Condition 18618, Part 1. None of these sources appear in Condition 18618. These throughput limits should be added to Condition 18618, Part 1. The correct throughputs can be found in the current PTO Condition 18643 Part 8. The condition should be referenced in both Section IV and VII tables for all the effected sources.

Modify Conditions 18618, Part 5 to Have an Annual Visible Emissions Check Instead of Quarterly. Historically, the sand hopper, coke silos, and dry fines silo have not posed visible emissions issues, since they are operated with methods to minimize fugitive dust. Reduce this requirement from quarterly to annual.

Visible Emissions Monitoring. If Condition 18618, Part 5 is Not Modified to Have an Annual Visible Emissions Check Instead of Quarterly, Then Add Language that Will Reduce Monitoring After Four Quarters of Visible Emissions Checks Indicate No Visible Emissions. Historically, the sand hopper, coke silos, and dry fines silo have not posed visible emissions issues, since they are operated with methods to minimize fugitive dust. Reduce this requirement from quarterly to annual.

Add A Future Effective Date On Condition 18618, Part 5. This new condition requires a quarterly visible emissions check on the sand hopper, coke silos, and dry fines silo. If the frequency is not changed to annual, then add a future effective date of 150 days from date of issuance, because time is needed to prepare management of change documents, develop and implement policies and procedures, prepare logs and provide training, etc.

On Table VII-BE For The S1650 Sandblasting Sand Hopper, Delete Condition 18618, Part 5 And Replace With None. Condition 18618, Part 5 visible emissions monitoring requirement is not an appropriate method for demonstrating compliance with the grain loading limit of BAAQMD 6-311.

- In Table VII-BG for S1767, S1768, and S1769, Delete Condition 18681, Part 5 And Replace With None.** Condition 18618, Part 5 visible emissions monitoring requirement is not an appropriate method for demonstrating compliance either with the grain loading limits of BAAQMD 6-310 and 6-311 or the control efficiency requirement of Condition 7618, Part D.3.
- In Table VII-BZ for S4005 Coke Handling Facility, Delete Condition 12271, Parts 77, L, And M As The Monitoring Requirements For The BAAQMD 6-10 And 6-311.** Unless a correlation between water content and “exhaust grain loading” for the material stored at the Coke Handling Facility exists, the Condition 12271, Part 77 water spray/water content requirements are not an appropriate method to demonstrate compliance with the BAAQMD 6-310 and 6-311 grain loading limits.
- In Table VII-BZ for S4005 Coke Handling Facility, Delete Condition 12271, Parts 75, L And M As The Monitoring Requirements For The Condition 12271, Parts 79 And 81 PM Limits.** Condition 12271, Part 75 is a visible emission limit, not a monitoring requirement. Replace Part 75 with None as there is no appropriate compliance monitoring requirement to demonstrate compliance with the Parts 79 and 81 grain loading limits.
- Add A Future Effective Date On Condition 18618, Part 7.** This new condition requires recordkeeping for all visible emissions checks required in Condition 18618, Parts 3, 5, and 6. Add a future effective date of 150 days from date of issuance, because time is needed to prepare management of change documents, develop and implement policies and procedures, prepare logs and provide training, etc.
- Condition 7618 List Of Applicable Sources Still Appears To Have Errors.** Shell previously recommended deleting this list because it was unnecessary and has errors. See previous comments from 2001 to the present that identify errors and correct them.
- Condition 7618 Is Listed Incorrectly For Many Sources in Section IV and VII Tables.** Review previous comments from 2001 to the present that identify errors and correct them. Also Shell will provide additional clarifications. Due to time constraints, Shell was unable to list all of the errors related to this condition that still exist in the draft Title V permit.
- Modify Condition 4041, Part 10 to Have an Annual Visible Emissions Check, If Operated, Rather Than Quarterly.** Historically, the coke corral has not had visible emissions, because it is operated with methods to minimize fugitive dust. Reduce this requirement from quarterly to annual.
- On Table VII-BM for the S1803 Coke Corral, change the monitoring frequency for Condition 4041, Part 10 from “P/E” to “P/A” or P/Q (unless the condition language is being modified to require the monitoring only during operation of the Coke Corral).**
- On Table VII-BM for the S1803 Coke Corral, delete Condition 4041, Parts 10 and 11 as the monitoring requirement for BAAQMD 6-311.** The visible emission inspection is not an appropriate method to demonstrate compliance with the 6-311 grain loading particulate matter limit.
- On Table VII-BM for the S1803 Coke Corral, delete the averaging period “for no more than 3 minutes/hour” for Condition 4041, Part 3, or modify the permit condition language to include the averaging period.**
- On Table VII-BQ, For The OPCEN Corrosion Inhibitor Injection (S2000), Change Condition 4827, Parts 2 And 4 To Condition 4364, Parts 2 And 4. Condition 4827 Appears To Be An Error.**

I. All Sources

- 1. Modify The Language In Condition 18618 Part 2 So That Recordkeeping Applies Only To Sources Listed In Condition 18618 Part 1 And, Possibly, The Sources Listed In Condition 16688 Part 1.** As currently written, Condition 18618, Part 2 applies to all sources in the facility. This recordkeeping requirement is inconsistent with the sources that do not have throughput limits, such as secondary downstream sources, wastewater sources, product blending and safety devices. Additionally many sources already have recordkeeping requirements in an existing condition.
- 2. Add A Future Effective Date on Condition 18618, Part 2.** This new recordkeeping condition requires determining whether all sources have a procedure and log for maintaining daily records. Add a future effective date of 150 days from date of issuance, because time is needed to prepare management of change documents, develop and implement policies and procedures, prepare logs and provide training, etc.
- 3. Correct Table references.** Some of the tables have been renumbered but the references to other tables have not been adjusted accordingly. Correct the table references in the following tables:

- IV-AU – change reference to IV-AT
 - IV-BB – change reference to BA
 - IV-BE – change reference to BD
 - IV-BF – change reference for BC to BD
 - IV-BH – change reference to BG
 - IV-BI – change reference for BF to BH
 - IV-BJ – change reference for BC to BE
 - IV-BM – change reference to Hb
 - IV-BR – change reference to AZ
 - IV-BS – change reference to BC
 - IV-DO – change reference to AXa
4. **Delete Condition 18618, Part 11 Startup/Shutdown Notification Requirements From Table IV-DV For Facility-Wide Applicability.** This permit condition should only be listed on the Table IV's for the process units included in the condition limited. Note, if the condition is deleted, then delete it from the entire document.
5. **Add BAAQMD Regulation 10 BAAQMD incorporation By Reference For NSPS Subparts.** This addition is for consistency with the Reg 10 references to 40 CFR 60 Subparts GGG, VV, and QQQ on Tables IV-DP, IV-DQ, and IV-DS. The following Reg 10 references should be added to Section VI tables showing applicability to 40 CFR 60 New Source Performance Standards:
- BAAQMD 10-1, Subpart A – General Provisions
 - BAAQMD 10-4, Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
 - BAAQMD 10-16 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids For Which Construction, Reconstruction, Modification Commenced After May 18, 1978 And Prior to July 23, 1984
 - BAAQMD 10-17, Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels
 - BAAQMD 10-40, Subpart GG – Standards of Performance for Stationary Gas Turbines
6. **Add BAAQMD Regulation 11-12 BAAQMD Incorporation By Reference Of 40 CFR 61 National Emission Standard For Benzene Emissions From Benzene Transfer Operations To All Table IV's Showing Applicability To 40 CFR 61 Subpart FF.**
7. **Correct Subpart A Requirements.** There are still errors in many of the tables regarding Subpart A requirements associated with NSPS, NESHAPS and MACT standards. These should be corrected.

**SEE Files: Aa Sulfur Mass Balance and
Ab Sulfur Mass Balance - Final
for sulfur and ammonia calculations**

Attachment IVB

**SIP Approved Versions of BAAQMD Regulations Chevron Products Company
Regulatory Provisions Cited in Proposed Draft Title V Operating Permit**

Prepared by Chevron, August 2002

Updated by Pillsbury Winthrop LLP on August 25, 2003

Updated/Modified by Shell, July 3 September 15, 2003

(SIP gaps indicated in blue*)

(~~ENSR [MTR] added rows in red~~ — ~~Late Nov/Dec, 2002~~ ~~Shell updates indicated in red~~)

This document identifies the dates of SIP approved rules and the date of current BAAQMD rules. For each of the BAAQMD rules, federal enforceability is determined. These findings result in the need for some corrections in the Title V Operating Permit. Some, but not all of these corrections are identified in Attachments C and D of this comment letter.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
Reg. 1	10/7/98	5/2/01	Permit Table III A refers to SIP Regulation 1, General Provisions and Definitions (8/27/99). This date is wrong. The EPA site is correct re the date of SIP rule. Table IV.A.1.1 correctly refers to date; reference to 6/28/99 is to date of FR notice. Tables IV.A.3.2, IV.A.3.3, IV.A.3.5, IV.A.5.1 incorrectly refer to 6/28/99 only. Table IV.E.2.1 incorrectly refers to 11/3/93 as the SIP rule date. (N) -Although sections of BAAQMD Reg. 1 are federally enforceable, BAAQMD Reg. 1 is not, in its entirety, federally enforceable. [Permit Table III A refers to SIP Regulation 1, General Provisions and Definitions (8/27/99). This date is wrong. The EPA website is correct re the date of SIP rule. Table IV.A.1.1 correctly refers to date; reference to 6/28/99 is to date of FR notice. Tables IV.A.3.2, IV.A.3.3, IV.A.3.5, IV.A.5.1 incorrectly refer to 6/28/99 only. Table IV.E.2.1 incorrectly refers to 11/3/93 as the SIP rule date.]
1-107	[9/5/79]	[9/5/79]	(Y) This BAAQMD Reg. is federally enforceable. Recodified eff. 1/1/80.
1-301	Not in SIP	5/2/90	(N) BAAQMD Reg. 1-301 is not federally enforceable.
1-400	10/21/92 is latest date in series	10/21/92 is latest date in series	(Y) All of the BAAQMD Reg. 4 Section 400 series (1-400 through 1-441) is federally enforceable. Does this refer to whole 400-series? (Section 400 is just the title.)
1-501	[9/5/79]	[9/5/79]	(Y) This BAAQMD Reg. is federally enforceable. Recodified eff. 1/1/80.
1-510	[9/5/79]	[9/5/79]	(Y) This BAAQMD Reg. is federally enforceable. Recodified eff. 1/1/80.
1-520	10/7/98	10/7/98	(Y) The listed parts of BAAQMD Reg. 1-520 are federally enforceable.
1-520.1	10/7/98	10/7/98	REC
1-520.4	10/7/98	10/7/98	REC
1-520.5	10/7/98	10/7/98	REC
1-520.8	10/7/98	10/7/98	REC
1-521	[9/5/79]	[9/5/79]	(Y) This BAAQMD Reg. is federally enforceable. Recodified eff. 1/1/80.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
1-522***	9/2/98	11/15/00	(N) Although sections of BAAQMD Reg. 1-522 are federally enforceable, BAAQMD Reg. 1-522 is not, in its entirety, federally enforceable.
1-522.1	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable.
1-522.2	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable.
1-522.3	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable.
1-522.4	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable.
1-522.5	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable.
1-522.6	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable.
1-522.7	9/2/98	11/15/00	(N) This BAAQMD Reg. not federally enforceable.
1-522.8	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable.
1-522.9	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable.
1-522.10	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable.
1-523	9/2/98	11/15/00	(N) Although sections of BAAQMD Reg. 1-523 are federally enforceable, BAAQMD Reg. 1-523 is not, in its entirety, federally enforceable. Specifically, 1-523.3 and 1-523.5 are not federally enforceable.
1-523.1*	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable [Although the dates are different, the intent of each rule is the same]
1-523.2*	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable [Although the dates are different, the intent of each rule is the same]
1-523.3	9/2/98	11/15/00	(N) This BAAQMD Reg. is not federally enforceable. [BAAQMD reg does not list 'corrective action' as a reporting requirement]
1-523.4*	9/2/98	11/15/00	(Y) This BAAQMD Reg. is federally enforceable [Although the dates are different, the intent of each rule is the same]
1-523.5	No SIP Rule	11/15/00	(N) This BAAQMD Reg. is not federally enforceable.
1-530	3/17/82	3/17/82	(Y) This BAAQMD Reg. is federally enforceable.
1-540	3/17/82	3/17/82	(Y) This BAAQMD Reg. is federally enforceable.
1-542	[9/5/79]	[9/5/79]	(Y) This BAAQMD Reg. is federally enforceable. Recodified eff. 1/1/80.
1-543	3/17/82	3/17/82	(Y) This BAAQMD Reg. is federally enforceable.
1-544	3/17/82	3/17/82	(Y) This BAAQMD Reg. is federally enforceable.
1-602	No SIP rule	9/2/98	(N) This BAAQMD Reg. is not federally enforceable.
Reg. 2, Rule 1	11/1/89	8/1/01	(N) Although sections of BAAQMD Reg. 2-1 are federally enforceable, BAAQMD Reg. 2-1 is not, in its entirety, federally enforceable. [Permit Tables IV.A.1.1, IV.A.3.2, IV.A.3.3, IV.A.3.5, IV.A.5.1 agree with 11/1/89 date of SIP rule; reference to 1/26/99 is to the date of the FR notice.]
2-1-234	No SIP rule of this number; cf SIP rule 2-2-223 (6/15/94)	11/15/00	(N) This BAAQMD Reg. is not federally enforceable. BAAQMD shifted certain definitions from Reg. 2, Rule 2 to Reg. 2, Rule 1 in 2000. Rule 2-2-223 became Rule 2-1-234, but the language was amended in significant respects.
2-1-301	10/19/83	5/17/00	(N) This BAAQMD Reg. is not federally enforceable.
2-1-403***	[1/1/80]	10/7/98	(N) This BAAQMD Reg. is not federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
2-1-429*	No SIP rule 6/15/94/1/95	6/7/95	(<u>NY</u>) This BAAQMD Reg. is <u>not</u> federally enforceable. [A 2/1/95 version of this provision was approved by EPA 6/23/95, but on 1/26/99, EPA approved the 11/1/89 version of Reg. 2, Rule 1, which did not include 2-1-429.] EPA considers the 2/1/95 approved version of this rule to still be in effect and it is posted on their website.]
2-1-501	3/17/82	3/17/82	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 2, Rule 2	6/15/94	5/17/00	(N) Although sections of BAAQMD Regulation 2-2 are federally enforceable, BAAQMD Reg. 2-2 is not, in its entirety, federally enforceable.
2-2-112	6/15/94	10/7/98	(N) This BAAQMD Reg. is not federally enforceable.
2-2-302	6/15/94	5/17/00	(N) This BAAQMD Reg. is not federally enforceable.
Reg. 2, Rule 3	12/19/79	[Undated; recodified eff. 1/1/80]	(Y) BAAQMD Reg. 2-3 is federally enforceable. Cursory section check of both rules indicates all sections are in SIP rule.
Reg. 2, Rule 4	6/15/94	5/17/00	(Y) BAAQMD Reg. 2-4 is federally enforceable.
Reg. 2, Rule 6	Certain sections, dated variously 11/3/93 and 2/1/95	5/2/01; 4/16/03 [certain sections; see Comments]	(<u>NY</u>) Although Certain sections of BAAQMD Reg. 2-6 are federally enforceable through the SIP, but BAAQMD Reg. 2-6 is not, in its entirety, federally enforceable through the SIP. However, <u>Only certain sections of the Title V rule are part of the SIP; however, the whole entire Title V rule would have been</u> approved as part of the Title V program. This needs to be checked further. <u>Mjk</u>The most recent revisions were submitted 5/30/01 for Title V purposes and approved by EPA 12/7/01; the current rule is therefore federally enforceable, with the following exceptions (which are later revisions, adopted by BAAQMD 4/16/03, that are not yet approved by EPA under the Title V program). The 4/16/03 amendments include revisions to 2-6-113, 2-6-201, 2-6-218 and 2-6-224 and the adoption of new 2-6-427 in its entirety.
2-6-409.2	No SIP rule; approved through Title V	5/2/01	(Y) Although this BAAQMD Reg. is not federally enforceable as a SIP rule, it is federally enforceable through the Title V program approval. (<u>Y</u>) This BAAQMD Reg. is federally enforceable.
2-6-501	No SIP rule; approved through Title V	5/2/01	(Y) Although this BAAQMD Reg. is not federally enforceable as a SIP rule, it is federally enforceable through the Title V program approval. (<u>Y</u>) This BAAQMD Reg. is federally enforceable.
2-6-503	No SIP rule; approved through Title V	5/2/01	(<u>NY</u>) Although this BAAQMD Reg. is not federally enforceable as a SIP rule, it is federally enforceable through the Title V program approval.
Reg. 2, Rule 9	No SIP rule	4/7/99	(N) This BAAQMD Reg. is not federally enforceable.
Reg. 3	7/6/83	6/5/02 7/2/03	(N) Although sections of BAAQMD Reg. 3 may be federally enforceable, BAAQMD Reg. 3 is not, in its entirety, federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
Reg. 4	9/7/88	3/20/91	(N) Although sections of BAAQMD Reg. 4 are federally enforceable, BAAQMD Reg. 4 is not, in its entirety, federally enforceable. For example, Reg. 4-302 is not federally enforceable.
Reg. 5	11/2/94	3/6/02	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 6	12/19/90	12/19/90	(Y) This BAAQMD Reg. is federally enforceable.
6-301	7/11/90	7/11/90	(Y) This BAAQMD Reg. is federally enforceable.
6-302	7/11/90	7/11/90	(Y) This BAAQMD Reg. is federally enforceable.
6-303	7/11/90	7/11/90	(Y) This BAAQMD Reg. is federally enforceable.
6-304	[Undated; recodified eff. 1/1/80]	[Undated; recodified eff. 1/1/80]	(Y) This BAAQMD Reg. is federally enforceable.
6-305	"	"	(Y) This BAAQMD Reg. is federally enforceable.
6-310	"	"	(Y) This BAAQMD Reg. is federally enforceable.
6-310.3	"	"	(Y) This BAAQMD Reg. is federally enforceable.
6-311	"	"	(Y) This BAAQMD Reg. is federally enforceable.
6-330	"	"	(Y) This BAAQMD Reg. is federally enforceable.
6-401	"	"	(Y) This BAAQMD Reg. is federally enforceable.
6-501	"	"	(Y) This BAAQMD Reg. is federally enforceable.
6-502	"	"	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 7	No SIP rule	3/17/82	(N) This BAAQMD Reg. is not federally enforceable.
Reg. 8			
Reg. 8, Rule 1	6/15/94	6/15/94	(Y) This BAAQMD Reg. is federally enforceable.
8-1-110.3	3/17/82	3/17/82	(Y) This BAAQMD Reg. is federally enforceable.
8-1-320	5/18/88	5/18/88	(Y) This BAAQMD Reg. is federally enforceable.
8-1-321	5/18/88	5/18/88	(Y) This BAAQMD Reg. is federally enforceable.
8-1-322	5/18/88	5/18/88	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 8, Rule 2	6/15/94	6/15/94	(N) Although all but one section of BAAQMD Reg. 8-2 are federally enforceable, BAAQMD Reg. 8-2 is not, in its entirety, federally enforceable – the SIP rule is missing one exemption for outdoor fires, which p. Probably doesn't matter here.
8-2-301	5/21/80	5/21/80	(Y) This rule is federally enforceable.
Reg. 8, Rule 3	12/20/95	11/21/01	(N) Although some sections of BAAQMD Reg. 8-3 may be federally enforceable, BAAQMD Reg. 8-3 is not, in its entirety, federally enforceable.
8-3-302	9/3/86	11/21/01	(N) This BAAQMD Reg. is not federally enforceable.
8-3-304	1/8/986	11/21/01	(N) This BAAQMD Reg. is not federally enforceable.
Reg. 8, Rule 4	12/20/95	5/15/96 10/16/025/15/96	(N) Although some sections of BAAQMD Reg. 8-4 may be federally enforceable, BAAQMD Reg. 8-4 is not, in its entirety, federally enforceable. [Date of SIP rule on EPA website is same as date of SIP BAAQMD Regulation 8, Rule 4 in Table IV.H.3.1 of permit.]
8-4-302***	6/1/94	5/15/96 10/16/025/15/96	(N) This BAAQMD Reg. is not federally enforceable.
8-4-302.1***	No SIP rule	5/15/96 10/16/025/15/96 10/16/025/15/96	(N) This BAAQMD Reg. is not federally enforceable. Identified in Table VII.H.2.1 as SIP 8-4-302.1. Why?
8-4-302.2	No SIP rule	5/15/96 10/16/025/15/96 10/16/025/15/96	(N) This BAAQMD Reg. is not federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-4-302.3	No SIP rule	5/15/96 10/16/025/15/96 10/16/025/15/96	(N) This BAAQMD Reg. is not federally enforceable.
8-4-312	No SIP rule	5/15/96 10/16/025/15/96 10/16/025/15/96	(N) This BAAQMD Reg. is not federally enforceable.
8-4-312.1	No SIP rule	5/15/96 10/16/025/15/96 10/16/025/15/96	(N) This BAAQMD Reg. is not federally enforceable.
8-4-312.2	No SIP rule	10/16/025/15/96 10/16/025/15/96 10/16/025/15/96	(N) This BAAQMD Reg. is not federally enforceable.
8-4-312.3	No SIP rule	10/16/025/15/96 10/16/025/15/96 10/16/025/15/96	(N) This BAAQMD Reg. is not federally enforceable.
<u>8-4-313</u>	<u>No SIP rule</u>	<u>10/16/02</u>	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-4-501 <u>*</u>	6/1/94	10/16/025/15/96 10/16/025/15/96 10/16/02	(Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. (N) Although some sections of BAAQMD Reg. 8-4-501 may be federally enforceable, BAAQMD Reg. 8—4-501 is not, in its entirety, federally enforceable. (Y) (Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. The Chevron analysis was conducted 08/02. BAAQMD adopted this rule 10/02. Based on MTR's review of the current and SIP rules, the wording is different, and the rules are different.
8-4-501.1 <u>*</u>	6/1/94	10/16/025/15/96 10/16/025/15/96 10/16/025/15/96	(Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. The Chevron analysis was conducted 08/02. BAAQMD adopted this rule 10/02. Based on MTR's review of the current and SIP rules, the wording is different, and the rules are different. (Y) This BAAQMD Reg. is federally enforceable.
8-4-501.2 <u>*</u>	6/1/94	10/16/025/15/96 10/16/025/15/96 10/16/025/15/96	(Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. The Chevron analysis was conducted 08/02. BAAQMD adopted this rule 10/02. Based on MTR's review of the current and SIP rules, the wording is different, and the rules are different. (Y) This BAAQMD Reg. is federally enforceable.
8-4-501.3 <u>*</u>	6/1/94	10/16/025/15/96 10/16/025/15/96 10/16/025/15/96	(Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. The Chevron analysis was conducted 08/02. BAAQMD adopted this rule 10/02. Based on MTR's review of the current and SIP rules, the wording is different, and the rules are different. (Y) This BAAQMD Reg. is federally enforceable.

BAAQMD Rule No.	Date of SIP- Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
<u>8-4-501.4</u>	<u>6/1/94</u>	10/16/02 <u>5/15/96</u> 10/16/02 <u>5/15/96</u> <u>10/16/02</u>	(Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. The Chevron analysis was conducted 08/02. BAAQMD adopted this rule 10/02. Based on MTR's review of the current and SIP rules, the wording is different, and the rules are different. Note that more is required under the SIP. The BAAQMD rule requires that records be retained and available for inspection by the APCO for the previous 24 month period. The SIP rule requires 36 months.
<u>8-4-501.5</u>	No SIP rule	<u>10/16/02</u>	(N) This BAAQMD Reg. is not federally enforceable.
Reg. 8, Rule 5	12/15/99 <u>11/27/02</u>	12/15/99 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-5-110	1/20/93 <u>11/27/02</u>	1/20/93 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
<u>8-5-110.2</u>	1/20/93 <u>11/27/02</u>	1/20/93 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-5-111	12/15/99 <u>11/27/02</u>	12/15/99 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-5-112	12/15/99 <u>11/27/02</u>	12/15/99 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-5-117	1/20/93 <u>11/27/02</u>	1/20/93 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-5-207	1/20/93 <u>11/27/02</u>	1/20/93 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-5-301	1/20/93 <u>11/27/02</u>	1/20/93 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-5-302	12/15/99 <u>11/27/02</u>	12/15/99 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-5-303	1/20/93 <u>11/27/02</u>	1/20/93 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
<u>8-5-304</u>	<u>11/27/02</u>	<u>11/27/02</u>	(Y) This BAAQMD Reg is federally enforceable.
8-5-305	1/20/93 1/20/93 <u>11/27/02</u>	1/20/93 1/20/93 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
<u>8-5-306</u>	<u>11/27/02</u>	<u>11/27/02</u>	(Y) This BAAQMD Reg is federally enforceable.
<u>8-5-307</u>	<u>11/27/02</u>	<u>11/27/02</u>	(Y) This BAAQMD Reg is federally enforceable.
8-5-311	1/20/93 "Deleted <u>11/27/02</u> " 1/20/93	1/20/93 "Deleted <u>11/27/02</u> " 1/20/93 <u>11/27/02</u> 1/20/93	(Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. This section was deleted.
<u>8-5-311.3</u>	1/20/93 "Deleted <u>11/27/02</u> " 1/20/93 Deleted 1/20/93	1/20/93 "Deleted <u>11/27/02</u> " 1/20/93 <u>11/27/02</u> 1/20/93	(Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. This section was deleted. (Y) This BAAQMD Reg. is federally enforceable.
8-5-320	12/15/99 <u>11/27/02</u>	12/15/99 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-5-321	12/15/99 <u>11/27/02</u>	12/15/99 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-5-322	1/20/93 <u>11/27/02</u>	1/20/93 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-5-328	1/20/93 <u>11/27/02</u>	1/20/93 <u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
<u>8-5-328.2</u>	<u>11/27/02</u>	<u>11/27/02</u>	(Y) This BAAQMD Reg. is federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-5-329	1/20/93 "Deleted" 11/27/02 1/20/93 Deleted 1/20/93	1/20/93 "Deleted" 11/27/02 1/20/93 11/27/02 1/20/93	(Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. This section was deleted. (Y) This BAAQMD Reg. is federally enforceable.
8-5-330	1/20/93 "Deleted" 11/27/02 1/20/93 Deleted 1/20/93	1/20/93 "Deleted" 11/27/02 1/20/93 11/27/02 1/20/93	(Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. This section was deleted. (Y) This BAAQMD Reg. is federally enforceable.
8-5-401	1/20/93 11/27/02	1/20/93 11/27/02	(Y) This BAAQMD Reg. is federally enforceable.
8-5-402	1/20/93 11/27/02	1/20/93 11/27/02	(Y) This BAAQMD Reg. is federally enforceable.
8-5-403	1/20/93 11/27/02	1/20/93 11/27/02	(Y) This BAAQMD Reg. is federally enforceable.
8-5-404	1/20/93 11/27/02	1/20/93 11/27/02	(Y) This BAAQMD Reg. is federally enforceable.
8-5-405	1/20/93	1/20/93 1/20/93	(Y) This BAAQMD Reg. is federally enforceable.
8-5-501	1/20/93 11/27/021/20/93	1/20/93 11/27/021/20/93	(Y) This BAAQMD Reg. is federally enforceable.
8-5-502	11/27/02 1/20/93	11/27/02 1/20/93	(Y) This BAAQMD Reg. is federally enforceable.
8-5-602	5/4/88 5/4/88	5/4/88	(Y) This BAAQMD Reg. is federally enforceable.
8-5-603.1	11/27/02 1/20/93	11/27/02 1/20/93	(Y) This BAAQMD Reg. is federally enforceable.
8-5-603.2	11/27/02 1/20/93	11/27/02 1/20/93	(Y) This BAAQMD Reg. is federally enforceable.
8-5-604	1/20/93 1/20/93	1/20/93 1/20/93	(Y) This BAAQMD Reg. is federally enforceable.
8-5-605	11/27/02	11/27/02	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 8, Rule 6	2/2/94	2/2/94	(Y) This BAAQMD Reg. is federally enforceable.
8-6-111	2/2/94	2/2/94	(Y) This BAAQMD Reg. is federally enforceable.
8-6-301	2/2/94	2/2/94	(Y) This BAAQMD Reg. is federally enforceable.
8-6-302.1	2/2/84	2/2/84	(Y) This BAAQMD Reg. is federally enforceable.
8-6-302.2	2/2/84	2/2/84	(Y) This BAAQMD Reg. is federally enforceable.
8-6-503	2/2/94	2/2/94	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 8, Rule 7	1/17/99 11/06/02	1/17/99 11/06/021/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-113	11/30/83	11/30/83	(Y) This BAAQMD Reg. is federally enforceable.
8-7-301	1/17/99 11/06/021/17/99	1/17/99 11/06/021/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-301.1	1/17/99 11/06/021/17/99	1/17/99 11/06/021/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-301.2***	1/17/99 11/06/021/17/99	1/17/99 11/06/021/17/99	(Y) This BAAQMD Reg. is federally enforceable. [Identified in Table VII.B.2.1 as SIP 8-7-302.1-2. Why does BAAQMD think this is a SIP rule??]
8-7-301.3	1/17/99 11/06/021/17/99	1/17/99 11/06/021/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-301.5	1/17/99 11/06/021/17/99	1/17/99 11/06/021/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-301.6	1/17/99 11/06/021/17/99	1/17/99 11/06/021/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-301.7	1/17/99 11/06/021/17/99	1/17/99 11/06/021/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-301.8	1/17/99 11/06/021/17/99	1/17/99 11/06/021/17/99	(Y) This BAAQMD Reg. is federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-7-301.9	11/17/99 <u>11/06/02</u>	11/17/99 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-301.10	11/17/99 <u>11/06/02</u>	11/17/99 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-301.11	11/17/99 <u>11/06/02</u>	11/17/99 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-301.12	11/17/99 <u>11/06/02</u>	11/17/99 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
<u>8-7-301.13</u>	<u>11/06/02</u>	<u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.1	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.2	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.3	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.4	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.5	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.6	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.7	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.8	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.9	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.10	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.11	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.12	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-302.13	11/06/02 <u>11/06/02</u>	11/06/02 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
<u>8-7-302.14</u>	<u>11/06/02</u>	<u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
<u>8-7-302.15</u>	<u>11/06/02</u>	<u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-303	11/17/99	11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-304	11/17/99	11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-306	Undated; recodified eff. 1/1/80 <u>11/06/02</u>	Undated; recodified eff. 1/1/80 <u>11/06/02</u>	(Y) This BAAQMD Reg. is federally enforceable.
8-7-307	11/17/99	11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-308	11/30/83	11/30/83	(Y) This BAAQMD Reg. is federally enforceable.
8-7-309	10/17/90	10/17/90	(Y) This BAAQMD Reg. is federally enforceable.
<u>8-7-311</u>	<u>11/17/99</u>	<u>11/17/99</u>	(Y) This BAAQMD Reg. is federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-7-313	11/06/02 11/17/99	11/06/02 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-313.1	11/06/02 11/17/99	11/06/02 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-313.2	11/06/02 11/17/99	11/06/02 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-313.3	11/06/02 11/17/99	11/06/02 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-315	11/06/02 11/17/99	11/06/02 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-401	11/17/99 11/17/99	11/17/99 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-406	11/17/99 11/17/99	11/17/99 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-407	11/06/02	11/06/02	(Y) This BAAQMD Reg. is federally enforceable.
8-7-408	11/06/02	11/06/02	(Y) This BAAQMD Reg. is federally enforceable.
8-7-501	11/17/99 11/17/99	11/17/99 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-502	10/17/90	10/17/90	(Y) This BAAQMD Reg. is federally enforceable.
8-7-503	11/06/02 11/17/99	11/06/02 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-503.1	11/06/02 11/17/99	11/06/02 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-503.2	11/06/02 11/17/99	11/06/02 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
8-7-503.3	11/06/02 11/17/99	11/06/02 11/17/99	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 8, Rule 8	6/15/94	6/15/94	
8-8-112	11/1/89	11/1/89	(Y) This BAAQMD Reg. is federally enforceable.
8-8-114	11/1/89	11/1/89	(Y) This BAAQMD Reg. is federally enforceable.
8-8-210	11/1/89	11/1/89	(Y) This BAAQMD Reg. is federally enforceable.
8-8-301	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-301.1	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-301.2	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-301.3	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-302	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-302.1	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-302.2	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-302.3	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-302.4	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-303	11/1/89	11/1/89	(Y) This BAAQMD Reg. is federally enforceable.
8-8-307	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-307.1	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-307.2	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-311	“Deleted 10/6/93”	“Deleted 10/6/93”	(N) Why is this cited? Possible typographical error – the District may have intended Reg. 8-5-311. This section is deleted.
8-8-501	11/1/89	11/1/89	(Y) This BAAQMD Reg. is federally enforceable.
8-8-502	11/1/89	11/1/89	(Y) This BAAQMD Reg. is federally enforceable.
8-8-503	10/6/93	10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-8-504	6/15/94	6/15/94	(Y) This BAAQMD Reg. is federally enforceable.
8-8-602	6/15/94	6/15/94	(Y) This BAAQMD Reg. is federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-8-603	6/15/94	6/15/94	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 8, Rule 9	7/20/83	7/20/83	Cursory section check of both rules indicates all sections are in SIP rule.
Reg. 8, Rule 10	7/20/83	7/20/83	(Y) This BAAQMD Reg. is federally enforceable.
8-10-301	3/20/83	3/20/83	(Y) This BAAQMD Reg. is federally enforceable.
8-10-401	7/10/83	7/10/83	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 8, Rule 15	6/1/94	6/1/94	(Y) This BAAQMD Reg. is federally enforceable.
8-15-305	9/16/87	9/16/87	(Y) This BAAQMD Reg. is federally enforceable.
8-15-501	6/1/94	6/1/94	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 8, Rule 16	6/15/94	9/16/98 10/16/02	(N) Although some sections of BAAQMD Reg. 8-16 are federally enforceable, BAAQMD Reg. 8-16 is not, in its entirety, federally enforceable. [Date of SIP rule on EPA website is same as date of SIP BAAQMD Regulation 8, Rule 16 in Table IV.H.1.1 of permit.] (N) Although some sections of BAAQMD Reg. 8-16 are federally enforceable, BAAQMD Reg. 8-16 is not, in its entirety, federally enforceable.
8-16-111 *	7/3/85	10/16/02	(Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. [Although the dates are different, the intent of each rule is the same] [The intent of each rule is different.]
8-16-115 *	3/16/88	10/16/02	(Y) This BAAQMD Reg. is federally enforceable. [Although the dates are different, the intent of each rule is the same.] (N) This BAAQMD Reg. is not federally enforceable.
8-16-118	No SIP rule	8/2/89 10/16/02	(N) This BAAQMD Reg. is not federally enforceable.
8-16-121	No SIP rule	10/16/02	(N) This BAAQMD Reg. is not federally enforceable.
8-16-122	No SIP rule	10/16/02	(N) This BAAQMD Reg. is not federally enforceable.
8-16-303***	3/16/88	9/16/98 10/16/02	(N) Although some sections of BAAQMD Reg. 8-16-303 are federally enforceable, BAAQMD Reg. 8-16-303 is not, in its entirety, federally enforceable.
8-16-303.1***	3/16/88	9/16/98 10/16/02 9/16/98	(Y) (N) (N) Although some sections of BAAQMD Reg. 8-16-303.1 are federally enforceable, BAAQMD Reg. 8-16-303.1 is not, in its entirety, federally enforceable.
8-16-303.1.1*	3/16/88	9/16/98 10/16/02 9/16/98	(Y) This BAAQMD Reg. is federally enforceable.
8-16-303.1.2*	3/16/88	9/16/98 10/16/02 9/16/98	(Y) This BAAQMD Reg. is federally enforceable.
8-16-303.1.3*	3/16/88	9/16/98 10/16/02	(Y) This BAAQMD Reg. is federally enforceable.
8-16-303.1.4***	3/16/88	9/16/98 10/16/02 9/16/98	(N) (N) This BAAQMD Reg. is not federally enforceable. (Y) This BAAQMD Reg. is federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-16-303.1.4.a***	3/16/88	9/16/98 10/16/029/16/98	(N) This BAAQMD Reg. is not federally enforceable. This BAAQMD Reg. is not federally enforceable. (Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable.
8-16-303.1.4.b***	3/16/88	9/16/98 10/16/029/16/98	(N) This BAAQMD Reg. is not federally enforceable. This BAAQMD Reg. is not federally enforceable. (Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable.
8-16-303.1.5***	3/16/88	9/16/98 10/16/029/16/98	(N) This BAAQMD Reg. is not federally enforceable.
8-16-303.1.6***	3/16/88	9/16/98 10/16/029/16/98	(N) This BAAQMD Reg. is not federally enforceable.
8-16-303.2*	3/16/88	9/16/98 10/16/029/16/98	(Y) This BAAQMD Reg. is federally enforceable.
8-16-303.2.1*_*	3/16/88	9/16/98 10/16/029/16/98	(Y) This BAAQMD Reg. is federally enforceable.
8-16-303.2.2*_*	3/16/88	9/16/98 10/16/029/16/98	(Y) This BAAQMD Reg. is federally enforceable.
8-16-303.2.3*_*	3/16/88	9/16/98 10/16/029/16/98	(Y) This BAAQMD Reg. is federally enforceable.
8-16-303.3_*	3/7/79	9/16/98 10/16/029/16/98	(N) This BAAQMD Reg. is not federally enforceable.
8-16-303.3.1*	3/7/79	9/16/98 10/16/029/16/98	(Y) This BAAQMD Reg. is federally enforceable.
8-16-303.3.2***	3/7/79	9/16/98 10/16/029/16/98	(N) This BAAQMD Reg. is not federally enforceable.
8-16-303.3.3***	3/7/79	9/16/98 10/16/029/16/98	(N) This BAAQMD Reg. is not federally enforceable.
8-16-303.3.4*	3/7/79	9/16/98 10/16/029/16/98	(Y) This BAAQMD Reg. is federally enforceable.
8-16-303.4	3/16/88	10/16/02	(Y) (N) This BAAQMD Reg. is not not federally enforceable. [The intent of each rule is different.]
8-16-303.4.1	3/16/88	10/16/02	(Y) (N) This BAAQMD Reg. is not federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. [The intent of each rule is different.]
8-16-303.5	No SIP rule	10/16/02	(N) (N) This BAAQMD Reg. is not federally enforceable.
8-16-501***	3/16/88	9/16/98 10/16/029/16/98 16/98 10/16/02	(N) This BAAQMD Reg. is not federally enforceable.
8-16-501.2***	3/16/88	9/16/98 10/16/029/16/98 10/16/02	(N) This BAAQMD Reg. is not federally enforceable. [The intent of each rule is different.]
8-16-501.3	No SIP rule	10/16/02	(N) This BAAQMD Reg. is not federally enforceable. (Y) (N) This BAAQMD Reg. is not federally enforceable. [Although the dates are different, the intent of the rules is the same.]

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-16-501.5	No SIP rule	10/16/02	(N) This BAAQMD Reg. is not federally enforceable.
8-16-501.6	No SIP rule	10/16/02	(N) This BAAQMD Reg. is not federally enforceable.
Reg. 8, Rule 18	11/27/02 1/7/98	1/7/98 11/27/02	There is no SIP rule posted on the EPA website.(Y) The BAAQMD Reg. is federally enforceable in its entirety.
8-18-100	[1/7/98] is date of all provisions in series	[1/7/98] is date of all provisions in series	Does this refer to whole 100 series? Section 100 is just the title. (Y) Section 100 is just the title, but all of the BAAQMD Reg. 8-18-100 series (8-18-100 through 8-18-118) is federally enforceable. Section 100 is just the title.
8-18-200	[1/7/98] is latest date in series	[1/7/98] is latest date in series	(Y) Section 200 is just the title, but aAll of the BAAQMD Reg. 8-18-200 series (8-18-200 through 8-18-224) is federally enforceable. Section 200 is just the title. Does this refer to whole 200 series? Section 200 is just the title. (Y) All of BAAQMD Reg. 8-18-200 is federally enforceable.
8-18-211	[1/7/98]	[1/7/98]	(Y) This BAAQMD Reg. is federally enforceable.
8-18-301	[1/7/98]	[1/7/98]	(Y) This BAAQMD Reg. is federally enforceable.
8-18-302	1/7/98 [1/7/98] 1/7/98	1/7/98 [1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-303	1/7/98 [1/7/98] 1/7/98	1/7/98 [1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-304	1/7/98 [1/7/98] 1/7/98	1/7/98 [1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-305	1/7/98 [1/7/98] 1/7/98	1/7/98 [1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-306	1/7/98 [1/7/98] 1/7/98	1/7/98 [1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-307	1/7/98 [1/7/98] 1/7/98	1/7/98 [1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-308	1/7/98 [1/7/98] 1/7/98	1/7/98 [1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-401	1/7/98 [1/7/98] 1/7/98	1/7/98 [1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-402	1/7/98 [1/7/98] 1/7/98	1/7/98 [1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-403	1/7/98 [1/7/98] 1/7/98	1/7/98 [1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-404	1/7/98 [1/7/98] 1/7/98	1/7/98 [1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-404.1	[1/7/98] 1/7/98	[1/7/98] 1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-405 *	[11/27/02] 1/7/98 1/7/98	1/7/98 11/27/021/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-406 *	[11/27/02] 1/7/98 1/7/98	1/7/98 11/27/021/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-18-501	[3/4/92]	[3/4/92]	(Y) This BAAQMD Reg. is federally enforceable.
8-18-502	[1/7/98]	[1/7/98]	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 8, Rule 19	12/20/95	12/20/95 10/16/02	(N) Although some sections of BAAQMD Reg. 8-19 are federally enforceable, BAAQMD Reg. 8-19 is not, in its entirety, federally enforceable.
8-19-134	[2/3/93]	[2/3/93]	(Y) This BAAQMD Reg. is federally enforceable.
8-19-302	[2/3/93]	[2/3/93]	(Y) This BAAQMD Reg. is federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-19-302.1	2/3/93	2/3/93	(Y) This BAAQMD Reg. is federally enforceable.
8-19-302.2	2/3/93	2/3/93	(Y) This BAAQMD Reg. is federally enforceable.
8-19-307**	6/7/89	6/7/89 10/16/02	(Y) This BAAQMD Reg. is federally enforceable.
8-19-312	6/15/94	6/15/94 6/15/94	(Y) This BAAQMD Reg. is federally enforceable.
8-19-312.1 through 312.13	6/15/94 6/15/94	6/15/94 6/15/94	(Y) These BAAQMD Regs. are federally enforceable.
8-19-313	10/6/93	10/6/93 10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-19-313.1	10/6/93 10/6/93	10/6/93 10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-19-313.2	10/6/93 10/6/93	10/6/93 10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-19-313.3	10/6/93 10/6/93	10/6/93 10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-19-313.4	10/6/93 10/6/93	10/6/93 10/6/93	(Y) This BAAQMD Reg. is federally enforceable.
8-19-320**	2/3/93	2/3/93 10/16/02 2/3/93	(Y/N) This BAAQMD Reg. is not federally enforceable.
8-19-320.1	2/3/93	2/3/93 10/16/02 2/3/93 10/16/02 2/3/93	(N) This BAAQMD Reg. is not federally enforceable. (Y) This BAAQMD Reg. is federally enforceable.
8-19-320.2**	2/3/93	2/3/93 10/16/02 2/3/93	(N) This BAAQMD Reg. is not federally enforceable.
8-19-320.3	2/3/93	2/3/93 10/16/02 2/3/93 10/16/02 2/3/93	(N) This BAAQMD Reg. is not federally enforceable. (Y) This BAAQMD Reg. is federally enforceable.
8-19-321	No SIP Rule	10/16/02	(N) This BAAQMD Reg. is not federally enforceable.
8-19-407	6/15/94	6/15/94	(Y) This BAAQMD Reg. is federally enforceable.
8-19-501	6/15/94 6/15/94	6/15/94 10/16/02	(N) This BAAQMD Reg. is not federally enforceable. (Y) This BAAQMD Reg. is federally enforceable.
8-19-501.1a*	6/15/94	10/16/02	(Y) This BAAQMD Reg. is federally enforceable.
8-19-501.1b*	6/15/94	10/16/02	(Y) This BAAQMD Reg. is federally enforceable.
8-19-501.1c	6/15/94 6/15/94	6/15/94 10/16/02 6/15/94	(Y) This BAAQMD Reg. is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable.
8-19-501.2*	6/15/94 6/15/94	6/15/94 10/16/02 6/15/94	(Y) This BAAQMD Reg. is federally enforceable.
8-19-501.3*	6/15/94 6/15/94	6/15/94 10/16/02 6/15/94	(Y) This BAAQMD Reg. is federally enforceable.
8-19-501.4*	6/15/94 6/15/94	6/15/94 10/16/02 6/15/94	(Y) This BAAQMD Reg. is federally enforceable.
8-19-501.5*	6/15/94 6/15/94	10/16/02 6/15/94 10/16/02 6/15/94	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 8, Rule 25	6/1/94	“Deleted 1-7-98”	(N) This BAAQMD Reg. is not federally enforceable-has been deleted and is not enforceable either locally or federally.
Reg. 8, Rule 28	6/1/94	3/18/98	Date of SIP rule on EPA website is same as date of SIP BAAQMD Regulation 8, Rule 28 in Tables III-A, IV.H.2 of permit. (N) Although some sections of BAAQMD Reg. 8-28 may be federally enforceable, BAAQMD Reg. 8-28 is not, in its entirety, federally enforceable. [Date of SIP rule on EPA website is same as date of SIP BAAQMD Regulation 8, Rule 28 in Tables III-A, IV.H.2 of permit.]

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-28-100***	6/1/94 is latest date in series	3/18/98 is latest date in series	(N) Does this refer to whole 100 series? Section 100 is just the title, "General". Although some of the general provisions contained under BAAQMD Reg. 8-28-100 are federally enforceable, the Reg. 8-28-100 series is not, in its entirety, federally enforceable.
8-28-200***	6/1/94 is latest date in series	12/17/97 is latest date in series	(N) Does this refer to whole 200 series? Section 200 is just the title, "Definitions". Although some of the definitions under BAAQMD Reg. 8-28-200 may be federally enforceable, the Reg. 8-28-200-series is not, in its entirety, federally enforceable.
8-28-301***	6/1/94	"Deleted 12/17/97"	(N) This BAAQMD Reg. has been deleted and is not enforceable either locally or federally. is not federally enforceable.
8-28-302	No SIP rule	12/17/97	(N) This BAAQMD Reg. is not federally enforceable.
8-28-303	No SIP rule	3/18/98	(N) This BAAQMD Reg. is not federally enforceable.
8-28-304	No SIP rule	3/18/98	(N) This BAAQMD Reg. is not federally enforceable.
8-28-401***	2/18/81	3/18/98	(N) This BAAQMD Reg. is not federally enforceable.
8-28-402***	6/1/94	12/17/97	(N) This BAAQMD Reg. is not federally enforceable.
8-28-403***	6/1/94	12/17/97	(N) This BAAQMD Reg. is not federally enforceable.
8-28-404***	6/1/94	12/17/97	(N) This BAAQMD Reg. is not federally enforceable.
8-28-405	No SIP rule	3/18/98	(N) This BAAQMD Reg. is not federally enforceable.
Reg. 8, Rule 31	12/20/95	12/20/95 10/16/02 12/20/95	(N) This BAAQMD Reg. is not federally enforceable in its entirety.
8-31-123	2/3/93	2/3/93	(Y) This BAAQMD Reg. is federally enforceable.
8-31-124	2/3/93	2/3/93	(Y) This BAAQMD Reg. is federally enforceable.
8-31-302	2/3/93	2/3/93 2/3/93	(Y) This BAAQMD Reg. is federally enforceable.
8-31-306	2/3/93 2/3/93	2/3/93 2/3/93	(Y) Each of the three subparts of BAAQMD Reg. 8-31-306 is federally enforceable.
8-31-306.1	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-306.2	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-306.3	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-307*-*	6/7/89	6/7/89 10/16/02 6/7/89	(Y) This BAAQMD Reg. is federally enforceable.
8-31-309	2/3/93 2/3/93	2/3/93 2/3/93	(Y) Each of the six subparts of BAAQMD Reg. -31-309 is federally enforceable.
8-31-309.1	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-309.2	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-309.3	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-309.4	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-309.5	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-309.6	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-310	2/3/93 2/3/93	2/3/93 2/3/93	(Y) Each of the four subparts of BAAQMD Reg. 8-31-310 is federally enforceable.
8-31-310.1	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-310.2	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-310.3	2/3/93 2/3/93	2/3/93 2/3/93	***
8-31-310.4	2/3/93 2/3/93	2/3/93 2/3/93	***

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-31-320**	2/3/93	2/3/93 10/16/022/3/93	(Y) Each of the three subparts of BAAQMD Reg. 8-31-320 is federally enforceable. (N) Although some sections of BAAQMD Reg. 8-31-320 may be federally enforceable, BAAQMD Reg. 8-31-320 is not, in its entirety, federally enforceable. This BAAQMD Reg. is not federally enforceable.
8-31-320.1*	2/3/93 2/3/93	2/3/93 10/16/022/3/93 10/16/022/3/93	(Y) Each of the three subparts of BAAQMD Reg. 8-31-320 is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable." <u>cc</u>
8-31-320.2**	2/3/93 2/3/93	2/3/93 10/16/022/3/93	Each of the three subparts of BAAQMD Reg. 8-31-320 is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable." <u>cc</u>
8-31-320.3*	2/3/93 2/3/93	2/3/93 10/16/022/3/93	Each of the three subparts of BAAQMD Reg. 8-31-320 is federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. (Y) Each of the three subparts of BAAQMD Reg. 8-31-320 is federally enforceable." <u>cc</u>
8-31-401	2/3/93 2/3/93	2/3/93 2/3/93	(Y) Each of the four subparts of BAAQMD Reg. 8-31-401 is federally enforceable.
8-31-501*	6/1/94	6/1/94 10/16/02	(Y) Each of the five subparts of BAAQMD Reg. 8-31-501 is federally enforceable. (N) -Although some sections of BAAQMD Reg. 8-31-501 may be federally enforceable, BAAQMD Reg. 8-31-501 is not, in its entirety, federally enforceable.
8-31-501.1a*	6/1/94	10/16/02	(Y) This BAAQMD Reg. is federally enforceable.
8-31-501.1b*	6/1/94	10/16/02	(Y) This BAAQMD Reg. is federally enforceable.
8-31-501.1c*	6/1/94	6/1/94 10/16/026/1/94	(N) This BAAQMD Reg. is not federally enforceable. " <u>cc</u>
8-31-501.2*	6/1/94	6/1/94 10/16/026/1/94	(Y) This BAAQMD Reg. is federally enforceable." <u>cc</u>
8-31-501.3*	6/1/94	6/1/94 10/16/026/1/94	(Y) This BAAQMD Reg. is federally enforceable." <u>cc</u>
8-31-501.4*	6/1/94	6/1/94 10/16/026/1/94	(Y) This BAAQMD Reg. is federally enforceable." <u>cc</u>
8-31-501.5*	6/1/94	6/1/94 10/16/026/1/94	(Y) This BAAQMD Reg. is federally enforceable." <u>cc</u>
Reg. 8, Rule 32	12/20/95	6/19/96	Date of SIP rule on EPA website is same as date of SIP BAAQMD Regulation 8, Rule 32 in Table IV.H.3.1 of permit. (N) Although sections of BAAQMD Reg. 8-32 are federally enforceable, BAAQMD Reg. 8-32 is not, in its entirety, federally enforceable. [Date of SIP rule on EPA website is same as date of SIP BAAQMD Regulation 8, Rule 32 in Table IV.H.3.1 of permit.]
8-32-111	4/17/91	4/17/91	(Y) This BAAQMD Reg. is federally enforceable.
8-32-301	4/17/91	4/17/91	(Y) This BAAQMD Reg. is federally enforceable.
8-32-302	"Deleted 4/17/91"	6/19/96	(N) This BAAQMD Reg. is not federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-32-302.1***	“Deleted 4/17/91”	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable. [Identified in Table VII.H.2.1 as SIP 8-32-302.1. Why?]</u>
8-32-302.2	“Deleted 4/17/91”	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-303***	7/6/94	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-303.1***	7/6/94	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-303.2***	7/6/94	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-304***	7/6/94	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-304.1***	7/6/94	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-304.2***	7/6/94	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-305	[9/21/83]	4/17/91	<u>(Y) This BAAQMD Reg. is federally enforceable.</u>
8-32-307	No SIP rule	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-320	4/17/91	4/17/91	<u>(Y) Each of the four subparts of BAAQMD Reg. 8-32-320 is federally enforceable.</u>
8-32-320.1	4/17/91	4/17/91	<u>(Y) This BAAQMD Reg. is federally enforceable.***</u>
8-32-320.2	4/17/91	4/17/91	<u>(Y) This BAAQMD Reg. is federally enforceable.***</u>
8-32-320.3	4/17/91	4/17/91	<u>(Y) This BAAQMD Reg. is federally enforceable.***</u>
8-32-320.4	4/17/91	4/17/91	<u>(Y) This BAAQMD Reg. is federally enforceable.***</u>
8-32-402***	7/6/94	“Deleted 6/19/96”	<u>(N) This BAAQMD Reg. has been deleted and is not enforceable either locally or federally.</u>
8-32-403	No SIP rule	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-404	No SIP rule	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-501***	6/15/94	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-501.1***	6/15/94	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-501.2	6/15/94	6/19/96	<u>(Y) BAAQMD Reg. 8-32-501.2 is stated exactly as the SIP Reg. Although the general introduction to Reg. 8-32-501 is not the same in the BAAQMD regulations as in the SIP regulations, the difference is not likely to matter here: The BAAQMD Reg. says, “Any person subject to Section 8-32-302, 303, 304, or 307 shall...” while the SIP Reg. does not include <u>reference to section 307.</u></u>
8-32-501.3***	6/15/94	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
8-32-501.4	6/15/94	6/19/96	<u>(Y) BAAQMD Reg. 8-32-501.4 is stated exactly as the SIP Reg. Although the general introduction to Reg. 8-32-501 is not the same in the BAAQMD regulations as in the SIP regulations, the difference is not likely to matter here: The BAAQMD Reg. says, “Any person subject to Section 8-32-302, 303, 304, or 307 shall...” while the SIP Reg. does not include <u>reference to section 307.</u></u>
8-32-503***	4/17/91	6/19/96	<u>(N) This BAAQMD Reg. is not federally enforceable.</u>
Reg. 8, Rule 40	12/15/99	12/15/99	<u>(Y) All of BAAQMD Reg. 8-440 is federally enforceable.</u>
8-40-116	12/15/99	12/15/99	<u>(Y) This BAAQMD Reg. is federally enforceable.</u>
8-40-116.2	12/15/99	12/15/99	<u>(Y) This BAAQMD Reg. is federally enforceable.</u>

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-40-205	12/15/99	12/15/99	(Y) This BAAQMD Reg. is federally enforceable.
8-40-304	12/15/99	12/15/99	(Y) This BAAQMD Reg. is federally enforceable.
8-40-305	12/15/99	12/15/99	(Y) This BAAQMD Reg. is federally enforceable.
8-40-306	12/15/99	12/15/99	(Y) This BAAQMD Reg. is federally enforceable.
8-40-402	12/15/99	12/15/99	(Y) Each of the seven subparts of BAAQMD Reg. 8-40-402 is federally enforceable.
8-40-601	12/15/99	12/15/99	(Y) This BAAQMD Reg. is federally enforceable.
8-40-601.2	12/15/99	12/15/99	(Y) This BAAQMD Reg. is federally enforceable.
8-40-601.3	12/15/99	12/15/99	(Y) This BAAQMD Reg. is federally enforceable.
8-40-601.4	12/15/99	12/15/99	(Y) This BAAQMD Reg. is federally enforceable.
8-40-604	12/15/99	12/15/99	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 8, Rule 44	1/4/89	1/4/89	(Y) All of BAAQMD Reg. 8-44 is federally enforceable. Federally enforceable.
8-44-301	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-301.1	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-301.2	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-302	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-303	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-304	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-304.1	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-304.2	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-402	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-402.1	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-402.2	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-501	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-501.1	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-501.2	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-501.3	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-501.4	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-501.5	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-501.6	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-501.7	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
8-44-502	1/4/89	1/4/89	(Y) This BAAQMD Reg. is federally enforceable.^^
Reg. 8, Rule 49	8/21/91	12/20/95	(N) Although some sections of BAAQMD Reg. 8-49 are federally enforceable, BAAQMD Reg. 8-49 is not, in its entirety, federally enforceable. [Permit Table III A refers to SIP Regulation 8, Rule 49, Organic Compounds, Aerosol Paint Products (3/22/95). Need to check whether District or, which is the EPA is correct as to date of SIP approved rule approval date, not the date of the rule.]
8-49-301 **	8/21/91	12/20/95	(N) This BAAQMD Reg. is not in its entirety federally enforceable. [The intent of each rule is different.]
8-49-302 *	8/21/91	12/20/95	(Y) (N) This BAAQMD Reg. is not federally enforceable. [Although the dates are different, the intent of each rule is the same.]
8-49-303 *	8/21/91	12/20/95	(Y) This BAAQMD Reg. is federally enforceable. [Although the dates are different, the intent of each rule is the same.] (N) This BAAQMD Reg. is not federally enforceable.
Reg. 8, Rule 51	5/2/01 2/26/02	7/17/02	(N) Although some sections of BAAQMD Reg. 8-51 are federally enforceable, BAAQMD Reg. 8-51 is not, in its entirety, federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
8-51-114	8/6/96	8/6/96	(Y) This BAAQMD Reg. is federally enforceable.
8-51-115	1/7/98	1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-51-125	5/2/01	5/2/01	(Y) This BAAQMD Reg. is federally enforceable.
8-51-126	1/7/98	1/7/98	(Y) This BAAQMD Reg. is federally enforceable.
8-51-504	5/2/01	5/2/01	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 9, Rule 1	5/20/92	3/15/95	(N) Although sections of BAAQMD Reg. 9-1 are federally enforceable, BAAQMD Reg. 9-1 is not, in its entirety, federally enforceable. [Permit Tables IV.C.2.1, IV.E.1.1, IV.E.2.1 agree with 5/20/92 date of SIP rule.]
9-1-110	5/20/92	5/20/92	(Y) This BAAQMD Reg. is federally enforceable.
9-1-301	5/20/92	5/20/92	(Y) This BAAQMD Reg. is federally enforceable.
9-1-302	2/16/83	2/16/83	(Y) This BAAQMD Reg. is federally enforceable.
9-1-304	[Undated; recodified eff. 1/1/80]	[Undated; recodified eff. 1/1/80]	(Y) This BAAQMD Reg. is federally enforceable.
9-1-307	5/20/92	5/20/92	(Y) This BAAQMD Reg. is federally enforceable.
9-1-310	[Undated; recodified eff. 1/1/80]	[Undated; recodified eff. 1/1/80]	(Y) Each of the three subparts of BAAQMD Reg. 9-1-310 is federally enforceable.
9-1-310.1	[Undated; recodified eff. 1/1/80]	[Undated; recodified eff. 1/1/80]	(N)
9-1-313	7/18/90	3/15/95	(N) Although part of BAAQMD Reg. 9-1-313 is federally enforceable, it is not federally enforceable in its entirety.
9-1-313.1	7/18/90	3/15/95	(Y) This BAAQMD Reg. is federally enforceable.
9-1-313.2***	7/18/90	3/15/95	(N) This BAAQMD Reg. is not federally enforceable.
9-1-313.3-*	7/18/90	3/15/95	(Y) This BAAQMD Reg. is federally enforceable. [Although the dates are different the wording and intent of each rule are the same.]
9-1-501	[Undated; recodified eff. 1/1/80]	[Undated; recodified eff. 1/1/80]	(Y) This BAAQMD Reg. is federally enforceable.
9-1-502	5/20/92	5/20/92	(Y) This BAAQMD Reg. is federally enforceable.
9-1-601	3/17/82	3/17/82	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 9, Rule 2	No SIP rule	10/6/99	(N) This BAAQMD Reg. is not federally enforceable.
9-2-110	No SIP rule	[No Undated—recodified eff. 1/1/80]	(N) This BAAQMD Reg. is not federally enforceable.
9-2-301	No SIP rule	[Undated No date—recodified eff. 1/1/80]	(N) This BAAQMD Reg. is not federally enforceable.
9-2-501	No SIP rule	10/6/99	(N) This BAAQMD Reg. is not federally enforceable.
9-2-601	No SIP rule	3/17/82	(N) This BAAQMD Reg. is not federally enforceable.
Reg. 9, Rule 3	No SIP rule 12/17/80	3/17/82	(N) This BAAQMD Reg. is not federally enforceable.
9-3-303	No SIP rule 1/28/81	3/17/82	(N) This BAAQMD Reg. is not federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
Reg. 9, Rule 8	1/20/93	8/1/01	(N) Although some sections of BAAQMD Reg. 9-8 <u>may be federally enforceable</u> , BAAQMD Reg. 9-8 is not, in its entirety, federally enforceable.
9-8-110.1	1/20/93	8/1/01	(Y) This BAAQMD Reg. is federally enforceable, although the SIP Rule is slightly different: Whereas the BAAQMD Reg exemption applies to sections 9-8-301, 302, and 502, the SIP Reg exemption applies to all of Reg. 9-8.
9-8-330	No SIP rule	8/1/01	(N) This BAAQMD Reg. is not federally enforceable.
9-8-331	No SIP rule	8/1/01	(N) This BAAQMD Reg. is not federally enforceable.
9-8-530	No SIP rule	8/1/01	(N) This BAAQMD Reg. is not federally enforceable.
Reg. 9, Rule 9	9/21/94	9/21/94	(Y) This BAAQMD Reg. is federally enforceable.
9-9-113	9/21/94	9/21/94	(Y) This BAAQMD Reg. is federally enforceable.
9-9-114	9/21/94	9/21/94	(Y) This BAAQMD Reg. is federally enforceable.
9-9-301	9/21/94	9/21/94	(Y) Each of the three subparts of BAAQMD Reg. 9-9-301 is federally enforceable.
9-9-301.3	9/21/94	9/21/94	“
9-9-401	9/21/94	9/21/94	(Y) This BAAQMD Reg. is federally enforceable.
9-9-501	9/21/94	9/21/94	(Y) This BAAQMD Reg. is federally enforceable.
Reg. 9, Rule 10	1/5/94/5/94	7/17/02	(N) Although some sections of BAAQMD Reg. 9-10 are federally enforceable, BAAQMD Reg.9-10 is not, in its entirety, federally enforceable.
9-10-110.3	1/5/94 1/5/94	[1/5/94] 1/5/94	(Y) This BAAQMD Reg. is federally enforceable.
9-10-301	No SIP rule	[1/5/94]	(N) This BAAQMD Reg. is not federally enforceable.
9-10-301.1	No SIP rule	[1/5/94]	(N) This BAAQMD Reg. is not federally enforceable.
9-10-301.2	No SIP rule	[1/5/94]	(N) This BAAQMD Reg. is not federally enforceable.
9-10-301.3	No SIP rule	[1/5/94]	(N) This BAAQMD Reg. is not federally enforceable.
9-10-302	No SIP rule	“Deleted 7/17/02”	(N) This BAAQMD Reg. <u>has been deleted and is not enforceable either locally or federally</u> . <u>is not federally enforceable</u> . Why is this section cited?
9-10-303*	1/5/94 1/5/94	7/17/02	(Y) This BAAQMD Reg. is federally enforceable.
9-10-304	No SIP rule	7/17/02 1/5/94]	(N) This BAAQMD Reg. is not federally enforceable.
9-10-305	No SIP rule	[1/5/94]	(N) This BAAQMD Reg. is not federally enforceable.
9-10-401	No SIP rule	7/17/02	(N) This BAAQMD Reg. is not federally enforceable.
9-10-403	1/5/94	[1/5/94]	(N) This BAAQMD Reg. is not federally enforceable. BAAQMD removed references to BARCT standards from this provision when it submitted the rule to EPA.
9-10-501	No SIP rule	[1/5/94]	(N) This BAAQMD Reg. is not federally enforceable.
9-10-502*	1/5/94 1/5/94	7/17/02	(N) This BAAQMD Reg. is not federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. The Chevron analysis was conducted 8/02. In 9/02 EPA completed the review and adoption of this reg.
9-10-502.1	No SIP rule No SIP rule	7/17/02	(N) This BAAQMD Reg. is not federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. The Chevron analysis was conducted 8/02. In 9/02 EPA completed the review and adoption of this reg
9-10-502.2*	No SIP rule 1/5/94	7/17/02	(N) This BAAQMD Reg. is not federally enforceable. (Y) This BAAQMD Reg. is federally enforceable.

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
9-10-504	No SIP rule No SIP rule No SIP rule	7/17/02 7/17/02	This BAAQMD Reg. is not federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. The Chevron analysis was conducted 8/02. In 9/02 EPA completed the review and adoption of this reg.(N) This BAAQMD Reg. is not federally enforceable.
9-10-505	No SIP rule No SIP rule	7/17/02 7/17/02	This BAAQMD Reg. is not federally enforceable. (N) This BAAQMD Reg. is not federally enforceable. The Chevron analysis was conducted 8/02. In 9/02 EPA completed the review and adoption of this reg.(N) This BAAQMD Reg. is not federally enforceable.
Reg. 10	No SIP rule	2/16/00	(N) BAAQMD Reg. 10 is not federally enforceable, although the NSPS provisions in the Code of Federal Regulations that are referenced in Reg. 10 are federally enforceable. Reg.10 NSPS are federally enforceable through NSPS delegation. Are Rule 14 (Subpart J) or Rules 15-17 (Subparts K, Ka and Kb) specifically referenced?
Reg. 10, Rule 52	No SIP rule	12/20/95	(NY) Although BAAQMD Reg. 10-52 is not federally enforceable through the SIP; however, NSPS Subpart VV is incorporated by reference and is federally enforceable because it is a federal rule. is federally enforceable through NSPS delegation.
Reg. 10-59	No SIP rule	4/19/89	(NY) Although BAAQMD Reg. 10-529 is not federally enforceable through the SIP; however, although NSPS Subpart GGG is incorporated by reference and is federally enforceable through NSPS delegation because it is a federal rule.
Reg. 10-69	No SIP rule	12/20/95	(NY) Although BAAQMD Reg. 10-5269 is not federally enforceable through the SIP; however, although NSPS Subpart QQQ is incorporated by reference and is federally enforceable because it is a federal rule. is federally enforceable through NSPS delegation.
Reg. 11, Rule 2	No SIP rule	10/7/98	(N) This BAAQMD Reg., re aAsbestos, is not federally enforceable. Asbestos rule. However, NESHAP Subpart M is delegated to BAAQMD, possibly through this rule.e.
Reg. 11, Rule 7	No SIP rule	5/15/85	(N) BAAQMD Reg. 11-7, benzene, is not federally enforceable, although the provisions of the Federal Code of Federal Regulations that are referenced in BAAQMD Reg. 11-7 are federally enforceable. [Benzene rule — not SIP approved. In addition, NESHAP Subpart VV is not delegated to BAAQMD. Therefore, to the extent Reg. 11, Rule 7 differs from Subpart VV, it is not federally enforceable.]
11-7-100	No SIP rule	[3/6/85]	11cc
11-7-200	No SIP rule	[3/6/85]	11cc
11-7-301	No SIP rule	[3/6/85]	11cc
11-7-302	No SIP rule	5/15/85	11cc
11-7-303	No SIP rule	5/15/85	11cc
11-7-304	No SIP rule	[3/6/85]	11cc
11-7-305	No SIP rule	[3/6/85]	11cc
11-7-306	No SIP rule	[3/6/85]	11cc

BAAQMD Rule No.	Date of SIP-Approved Rule	Date of Current BAAQMD Rule	Comments/Questions
11-7-307	No SIP rule	5/15/85	---
11-7-308	No SIP rule	5/15/85	---
11-7-309	No SIP rule	[3/6/85]	---
11-7-310	No SIP rule	[3/6/85]	---
11-7-311	No SIP rule	5/15/85	---
11-7-312	No SIP rule	5/15/85	---
11-7-313	No SIP rule	5/15/85	---
11-7-314	No SIP rule	[3/6/85]	---
11-7-601	No SIP rule	[3/6/85]	---
Reg. 11, Rule 12	No SIP rule	1/5/94	(N) BAAQMD Reg. 11-12, benzene transfer operations and waste operations, is not federally enforceable, although the provisions of the Code of Federal Regulations that are referenced in BAAQMD Reg. 11-12 are federally enforceable. Benzene transfer operations and waste operations rule. [NESHAP Subparts BB and FF are delegated to BAAQMD, possibly through Regulation 11, Rule 12.]
Reg. 12, Rule 4	12/19/79	7/11/90	(N) Although some sections of BAAQMD Reg. 12-4 are federally enforceable, BAAQMD Reg. 12-4 is not, in its entirety, federally enforceable. Note that the SIP rule is the version recodified eff. 1/1/80. Date The date of the SIP rule on EPA's website is the same date as date of that given for SIP BAAQMD Regulation 12, Rule 4 in Table III A of permit. Permit notes there are "Provisions No Longer in Current Rule..."
12-4-301	[Undated; recodified eff. 1/1/80]	7/11/90	(N) This BAAQMD Reg. is not federally enforceable."
12-4-303	[Undated; recodified eff. 1/1/80]	[Undated; recodified eff. 1/1/80]	(Y) This BAAQMD Reg. is federally enforceable."
12-4-304	7/11/90	7/11/90	"(N) This BAAQMD Reg. is not federally enforceable. [Why is 7/11/90 provision in a SIP rule submitted to EPA in 1980? Is this an EPA SIP error?]
12-4-305	[Undated; recodified eff. 1/1/80]	[Undated; recodified eff. 1/1/80]	(Y) This BAAQMD Reg. is federally enforceable."
12-4-306	[Undated; recodified eff. 1/1/80]	[Undated; recodified eff. 1/1/80]	(Y) This BAAQMD Reg. is federally enforceable."
12-4-308	No SIP rule	7/11/90	(N) This BAAQMD Reg. is not federally enforceable."
Reg. 12 Rule 11	No SIP rule	6/4/03	(N) This BAAQMD Rule is not federally enforceable.
Manual of Procedures, Volume V	1/20/82	1/20/82	Notwithstanding that these are shown as the same date, there are numerous differences between the versions, including sections in the SIP MOP that are not in the current BAAQMD MOP and vice versa.

NOTE: This chart was originally prepared in August-September 2002, based on a review of the Chevron Richmond Refinery draft Title V permit. The current update is based on a review of rules revised or adopted by BAAQMD since August 2002 and a review of BAAQMD rules approved by EPA since August 2002. The update has not been comprehensively checked against any of the current proposed refinery permits, although references to the new flare monitoring rule (Regulation 12, Rule 11) and to two new subparagraphs of Regulation 8, Rule 7 have been added to the chart, based on locating those provisions in the current proposed Richmond Refinery permit. Otherwise, the presence or absence of regulations or portions thereof in any of the proposed permits has not been reconfirmed. Also note that, although a later version of Regulation 9, Rule 10 was approved by EPA as a direct final rule in October 2002, the approval was subsequently withdrawn, leaving the prior approval in place.

* SIP Gap: In some cases, although the dates of the SIP-approved and current BAAQMD versions of the rule or section are different, the changes are not significant, and the rule or section has therefore been indicated as federally enforceable.

~~*** Rules marked with an a double asterisk are provisions BAAQMD has identified (in the permit) as SIP provisions that are different from, or no longer in, the current BAAQMD rule.~~

Notes re Dates in Table:

Dates for whole rules:

- Date of SIP approved rule is the date given on EPA's SIP tracking page for a particular rule as the date that rule (or rule revision) was adopted. (Note that in some cases, BAAQMD lists this date in the permit as the approval date (the date of the Federal Register notice.)
- Date of current BAAQMD rule is the date of the latest BAAQMD revisions to the rule as posted on the BAAQMD web site. Usually this date is at the bottom of all pages of the rule.

Dates for individual sections within a rule:

- Where the date of an individual section or paragraph is specified in the BAAQMD and/or the SIP approved version of the rule, that date is used, even though it may predate the date of the whole rule.

Dates for sections of a rule that do not contain a date:

- These are shown in brackets (except where the rule has not been subsequently amended, in which case, all dates are the date of adoption, without brackets). The bracketed dates are taken from the date ~~that~~ the rule was ~~said by BAAQMD to be~~ adopted. According to BAAQMD (this date usually appears at the beginning of the rule text, after the contents pages.)- The chart assumes~~tion is~~ that undated sections have not been changed since the date from the adoption date of the rule.
- Where BAAQMD did not place a no date appears at the beginning of the rule text, a bracketed note is inserted identifying the 1/1/80 effective date of the recodified regulations. In many cases, the actual requirement predated the recodification by several years, but was rewritten and renumbered, adopted during 1979, and made effective in its recodified form as of 1/1/80. (In places, EPA's SIP site shows a 12/19/79 adoption date for a provision indicated in the chart as eff. 1/1/80. This is not inconsistent.)

Note re EPA Regulations:

References to provisions of the EPA NSPS, NESHAP and MACT rules are not included in this chart since they are federally enforceable without regard to delegation or SIP approval.

Attachment C

Shell Martinez Refinery

Applicable SIP and BAAQMD Rule Section Clarifications

Prepared July 29, 2003

Some SIP versions of rules have not been included in the draft Title V Permit. Additionally, some BAAQMD rules have some sections that are federally enforceable and some that are not. To adequately address federal enforceability, some SIP rules and some sections of BAAQMD rule should be listed that are currently missing from the permit. Some of these corrections are identified in the table below. Note that this section has not been updated to reflect revisions in the August 2003 draft of the Title V Permit. Some table names may have changed. Additionally, changes in the SIP approved versions since July 2003 have not been incorporated.

Rules To Be Inserted Into Section IV Tables				
Insert in Table(s) IV-	Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
AP, AQ, AZ, BB, BC, BF, BJ, BK, CU, CV, CW	BAAQMD Reg 1 Rule 522	Continuous Emission Monitoring (CEM) and Recordkeeping Procedures (11/15/00)	N	
AP, AQ, AZ, BB, BC, BF, BJ, BK, CU, CV, CW	1-522.3	CEM performance testing required.	Y	
AP, AQ, AZ, BB, BC, BF, BJ, BK, CU, CV, CW	1-522.4	Inoperation > 24 hours shall be reported. Proof of repair shall be provided for downtime > 15 days.	Y	
AP, AQ, AZ, BB, BC, BF, BJ, BK, CU, CV, CW	1-522.5	Daily monitor calibration.	Y	
AP, AQ, AZ, BB, BC, BF, BJ, BK, CU, CV, CW	1-522.6	CEM maintenance required and must be accurate.	Y	
AP, AQ, AZ, BB, BC, BF, BJ, BK, CU, CV, CW	1-522.7	Excess emissions to be reported within 96 hours and the report shall include the nature, extent, and cause.	N	
AP, AQ, AZ, BB, BC, BF, BJ, BK, CU, CV, CW	1-522.8	Monitoring data to be submitted on a monthly basis.	Y	
AP, AQ, AZ, BB, BC, BF, BJ, BK, CU, CV, CW	1-522.9	Records shall be maintained for two years.	Y	
AP, AQ, AZ, BB, BC, BF, BJ, BK, CU, CV, CW	1-522.10	Monitors required by Sections 1-521 or 2-1-403 shall meet the requirements specified by the APCO.	Y	
AP, AQ, AZ, BB, BC, BF, BJ, BK, CU, CV, CW	SIP Reg 1 Rule 522	Continuous Emission Monitoring (CEM) and Recordkeeping Procedures (9/2/98)	Y	

Rules To Be Inserted Into Section IV Tables				
Insert in Table(s) IV-	Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
AP, AQ, AZ, BB, BC, BF, BJ, BK, CU, CV, CW	1-522.7	Excess emissions to be reported within 96 hours and the report shall include the nature, extent, cause and corrective action taken.	Y	
AZ, BB, BC, BF, BJ, BK, CF, CS, CU, CV, CW, CY	BAAQMD Reg 1 Rule 523	Parametric Monitoring and Recordkeeping (11/15/00)	N	
AZ, BB, BC, BF, BJ, BK, CF, CS, CU, CV, CW, CY	1-523.1	In operation > 24 hours shall be reported.	Y	
AZ, BB, BC, BF, BJ, BK, CF, CS, CU, CV, CW, CY	1-523.2	In operation shall not exceed 15 days per incident or 30 calendar days per 12-month period.	Y	
AZ, BB, BC, BF, BJ, BK, CF, CS, CU, CV, CW, CY	1-523.3	Violation of permit conditions to be reported within 96 hours, and the report shall include the nature, extent, and cause.	N	
AZ, BB, BC, BF, BJ, BK, CF, CS, CU, CV, CW, CY	1-523.4	Records maintained for two years.	Y	
AZ, BB, BC, BF, BJ, BK, CF, CS, CU, CV, CW, CY	1-523.5	Maintenance and calibration required.	N	
AZ, BB, BC, BF, BJ, BK, CF, CS, CU, CV, CW, CY	SIP Regulation 1	Parametric Monitoring and Recordkeeping (9/2/98)	Y	
AZ, BB, BC, BF, BJ, BK, CF, CS, CU, CV, CW, CY	1-523.3	Violation of permit conditions to be reported within 96 hours and the report shall include the nature, extent, cause and corrective action taken.	Y	
AZ, BB, BC, BF, BJ, BK, CF, CS, CU, CV, CW, CY	1-523.5	Maintenance and calibration required.	Y	
CB	BAAQ MD Reg 8 Rule 4	Organic Compounds – General Solvent and Surface Coating Operations (10/16/02)	N	
CB	8-4-501	Recordkeeping	N	
CB	8-4-501.5	Maintain Data Necessary to Evaluate Records Retention	N	
CB	SIP Reg 8 Rule 4	Organic Compounds – General Solvent and Surface Coating Operations (12/20/95)	Y	
CB	8-4-501	Recordkeeping	Y	
CB	8-4-501.4	Records Retention	Y	
DV	BAAQ MD Reg 8 Rule 16	Solvent Cleaning Operations (10/16/02)	N	

Rules To Be Inserted Into Section IV Tables				
Insert in Table(s) IV-	Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
DV	8-16-303.1.2	Leak Repair Requirement	Y	
DV	8-16-303.1.3	Solvent Storage or Disposal – Evaporation Prevention	Y	
DV	8-16-303.1.4	Waste Solvent Disposal	N	
DV	8-16-303.1.4a	Covered Containers for Waste Solvent Awaiting Pick-up	N	
DV	8-16-303.1.4b	On-site Waste Treatment	N	
DV	8-16-303.1.5	Solvent Evaporation Minimization Devices shall not be removed	N	
DV	8-16-303.1.6	Solvent Spray Requirements	N	
DV	8-16-303.3	Cold Cleaner General Equipment Requirements	N	
DV	8-16-303.3.1	Container	Y	
DV	8-16-303.3.2	Solvent Evaporation Reduction for Idle Equipment	N	
DV	8-16-303.3.3	Used Solvent Returned to Con	N	
DV	8-16-303.4	Label Stating Operating Requirements	N	
DV	8-16-303.4.1	Control Device (one of the following)	N	
DV	8-16-303.5	Freeboard Ratio ≥ 0.75	N	
DV	8-16-501	Solvent Records	N	
CD, DV	SIP Reg 8 Rule 16	Solvent Cleaning Operations (6/15/94)	Y	
CD, DV	8-16-303.1.4	Waste Solvent Disposal	Y	
CD, DV	8-16-303.1.4a	Covered Containers for Waste Solvent Awaiting Pick-up	Y	
CD, DV	8-16-303.1.4b	On-site Waste Treatment	Y	
CD, DV	8-16-303.1.5	Solvent Evaporation Minimization Devices shall not be Removed	Y	
CD, DV	8-16-303.1.6	Solvent Spray Requirements	Y	

Rules To Be Inserted Into Section IV Tables				
Insert in Table(s) IV-	Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
CD, DV	8-16-303.3	Cold Cleaner General Equipment Requirements	Y	
CD, DV	8-16-303.3.2	Solvent Evaporation Reduction for Idle Equipment	Y	
CD, DV	8-16-303.3.3	Used Solvent Returned to Container	Y	
CD, DV	8-16-303.4	Control Device (one of the following)	Y	
CD, DV	8-16-303.4.1	Freeboard Ratio > 0.75	Y	
DV	8-16-501	Solvent Records	Y	
DV	8-16-501.2	Facility-wide Annual Solvent Usage Records	Y	
AL	SIP Reg 8 Rule 28	Organic Compounds – Episodic Releases from Pressure Relief Devices at Petroleum Refineries and Chemical Plants (6/1/94)		
AL	8-28-401	Reporting at Petroleum Refineries and Chemical Plants	Y	
AL	8-28-402	Inspection	Y	
AL	8-28-403	Records	Y	
AL	8-28-404	Identification	Y	
CB	SIP Reg 8 Rule 31	Organic Compounds – Surface Coating of Plastic Parts and Products (12/20/95)	N	
CB	8-31-320	Solvent Evaporative Loss Minimization	Y	
	SIP Reg 8 Rule 49	Organic Compounds – Aerosol Paint Products (12/20/95)	Y	
CB	8-49-301	Limits	Y	
AQ, DV	SIP Reg 9 Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)	Y	
AQ, DV	9-1-313	Sulfur Removal Operations at Petroleum Refineries (processing more than 20,000 bbl/day of crude oil).	Y	

Rules To Be Inserted Into Section IV Tables				
Insert in Table(s) IV-	Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
DV	9-1-313.2	Operation of a sulfur removal and recovery system that removes and recovers: 95% of H2S from refinery fuel gas, and 95% of H2S and ammonia from process water streams.	Y	

Attachment D

Shell Martinez Refinery

Federal Enforceability of Applicable BAAQMD Requirements

Prepared July 29, 2003

The current draft Title V Operating Permit has errors and omissions regarding federal enforceability of applicable BAAQMD requirements. Some of these corrections are identified in the table below. Note that this section has not been updated to reflect revisions in the August 2003 draft of the Title V Permit. Some table names may have changed. Additionally, changes in the SIP approved versions since July 2003 have not been incorporated.

Corrections To Federal Enforceability of Applicable BAAQMD Requirements		
Referenced Regulation	Title V Table	Action
BAAQMD 1-522	IV-AP IV-AQ IV-AZ IV-BB IV-BC IV-BF IV-BJ IV-BK IV-BZ IV-CU IV-CV IV-CW VII-AR VII-AT VII-AU VII-AX VII-BA VII-BB VII-CD VII-CF VII-CG	The following rules are FE: 1-522.3 1-522.4 1-522.5 1-522.6 1-522.8 1-522.9 1-522.10 Rule 1-522.7 is not FE. The above subsections of Rule 1-522 must be added to the draft Title V permit with the correct FE notation.

Corrections To Federal Enforceability of Applicable BAAQMD Requirements		
Referenced Regulation	Title V Table	Action
BAAQMD 1-523	IV-AZ IV-BB IV-BC IV-BF IV-BJ IV-BK IV-BZ IV-CF IV-CS IV-CU IV-CV IV-CW IV-CY VII-AP VII-AQ VII-AR VII-AT VII-AU VII-AX VII-BA VII-BB VII-BL VII-CB VII-CD	The following rules are FE: 1-523.1 1-523.2 1-523.4 The following rules are not FE: 1-523.3 1-523.5 (no SIP rule) The above subsections of Rule 1-523 must be added to the draft Title V permit with the correct FE notation.
BAAQMD 8-4-501	IV-CB	The following rules are FE: 8-4-501.1 8-4-501.2 8-4-501.3 Rule 8-4-501.4 is not FE. Correct FE notations
BAAQMD 8-5-311.3	VII-L VII-Y	Rule has been deleted. Delete this row from the referenced tables.
BAAQMD 8-5-328.2	VII-D VII-I VII-L VII-P VII-R VII-U VII-W VII-Y VII- A Db VII-CM VII-CR	Rule 8-5-328.2 is FE. Insert Y in blank cell in FE column.

Corrections To Federal Enforceability of Applicable BAAQMD Requirements		
Referenced Regulation	Title V Table	Action
BAAQMD 8-7-301 -301.1 -301.2	IV-BN	Rule is FE. Change FE column from N to Y. Delete the associated SIP row.
BAAQMD 8-7-301.6 thru 301.12	IV-BN	Rule is FE. Change FE column from N to Y. Delete the associated SIP row.
BAAQMD 8-7-302.1 thru 302.3	IV-BN	Rule is FE. Change FE column from N to Y. Delete the associated SIP row.
BAAQMD 8-7-302.5 thru 302.13	IV-BN	Rule is FE. Change FE column from N to Y. Delete the associated SIP row.
BAAQMD 8-7-304	IV-BN	Rule is FE. Change FE column from N to Y. Delete the associated SIP row.
BAAQMD 8-7-307	IV-BN	Rule is FE. Change FE column from N to Y. Delete the associated SIP row..
BAAQMD 8-7-313	IV-BN	Rule is FE. Change FE column from N to Y. Delete the associated SIP row.
BAAQMD 8-7-315	IV-BN	Rule is FE. Change FE column from N to Y. Delete the associated SIP row.
BAAQMD 8-7-401	IV-BN	Rule is FE. Insert Y in FE column. Delete the associated SIP row.
BAAQMD 8-7-406	IV-BN	Rule is FE. Change FE column from N to Y. Delete the associated SIP row.
BAAQMD 8-7-501	IV-BN	Rule is FE. Change FE column from N to Y. Delete the associated SIP row.
BAAQMD 8-7-503 -503.1 -503.2 -503.3	IV-BN	Rule is FE. Change FE column from N to Y. Delete the associated SIP row.
BAAQMD 8-16-118	IV-DV VII-CW	Rule is not FE (no SIP rule). Change FE column from Y to N.
BAAQMD 8-16-121	IV-DV VII-CW	Rule is not FE (no SIP rule). Change FE column from Y to N.
BAAQMD 8-16-303	IV-CD IV-DV	Some subsections of this rule are FE and some are not. Change FE column from Y to N because the rule is not FE in its entirety.
BAAQMD 8-16-303.1	IV-DV	Some subsections of this rule are FE and some are not. Change FE column from Y to N because the rule is not FE in its entirety.

Corrections To Federal Enforceability of Applicable BAAQMD Requirements		
Referenced Regulation	Title V Table	Action
BAAQMD 8-16-303.1.1	IV-CD IV-DV	This subsection is FE. In FE column, insert Y in blank cell.
BAAQMD 8-16-303.1.2	IV-DV	Insert a row for this subsection. This rule is FE. In FE column, insert Y.
BAAQMD 8-16-303.1.3	IV-DV	Insert a row for this subsection. This rule is FE. In FE column, insert Y.
BAAQMD 8-16-303.1.4 -303.1.4a -303.1.4b	IV-DV	Insert a row for this subsection. This rule is not FE. In FE column, insert N. Insert applicable SIP row.
BAAQMD 8-16-303.1.5	IV-CD IV-DV	Insert a row for this subsection in Table IV-DV. Rule is not FE. In Table IV-CD, change Y to N. Insert applicable SIP row.
BAAQMD 8-16-303.1.6	IV-CD IV-DV	Insert a row for this subsection in Table IV-DV. Rule is not FE. In Table IV-CD, change Y to N. Insert applicable SIP row.
BAAQMD 8-16-303.3	IV-CD IV-DV	Insert a row for this subsection in Table IV-DV. Rule is not FE. In Table IV-CD, change Y to N. Insert applicable SIP row.
BAAQMD 8-16-303.3.1	IV-DV	Insert a row for this subsection. Rule is FE.
BAAQMD 8-16-303.3.2	IV-CD IV-DV	Insert a row for this subsection in Table IV-DV. Rule is not FE. In Table IV-CD, change Y to N. Insert applicable SIP row.
BAAQMD 8-16-303.3.3	IV-CD IV-DV	Insert a row for this subsection in Table IV-DV. Rule is not FE. In Table IV-CD, change Y to N. Insert applicable SIP row.
BAAQMD 8-16-303.4	IV-DV	Insert a row for this subsection. Rule is not FE. Insert applicable SIP row.
BAAQMD 8-16-303.4.1	IV-DV	Insert a row for this subsection. Rule is not FE. Insert applicable SIP row.
BAAQMD 8-16-303.5	IV-DV VII-BP VII-CW	Insert a row for this subsection. Rule is not FE.(no SIP rule) Need to change FE column from Y to N in Section VII tables.
BAAQMD 8-16-501	IV-DV	Insert a row for this subsection. Rule is not FE. Insert applicable SIP row.

Corrections To Federal Enforceability of Applicable BAAQMD Requirements		
Referenced Regulation	Title V Table	Action
BAAQMD 8-16-501.2	IV-DV VII-BP VII-CW (listed twice)	Rule is not FE. Need to change Y to N and insert associated SIP row.
BAAQMD 8-16-501.3	IV-DV	Rule is not FE (no SIP rule). Change FE column from Y to N.
BAAQMD 8-16-501.5	IV-DV VII-BP VII-CW (listed twice)	Rule is not FE (no SIP rule). Change FE column from Y to N.
BAAQMD 8-16-501.6	IV-CD IV-DV VII-CW	Add to Table IV-CD Rule is not FE (no SIP rule). Change FE column from Y to N.
BAAQMD 8-28-302	IV-AL	Rule is not FE (no SIP rule). Change FE column from Y to N.
BAAQMD 8-28-303	IV-AL VII-AE VII-AH	Rule is not FE (no SIP rule). Change FE column from Y to N.
BAAQMD 8-28-304	IV-AL VII-AE VII-AH	Rule is not FE (no SIP rule). Change FE column from Y to N.
BAAQMD 8-28-401	IV-AL	Rule is not FE. Change FE column from Y to N.and insert associated SIP row.
BAAQMD 8-28-402	IV-AL	Rule is not FE. Change FE column from Y to N.and insert associated SIP row.
BAAQMD 8-28-403	IV-AL	Rule is not FE. Change FE column from Y to N.and insert associated SIP row.
BAAQMD 8-28-404	IV-AL	Rule is not FE. Change FE column from Y to N.and insert associated SIP row.
BAAQMD 8-28-405	IV-AL	Rule is not FE (no SIP rule). Change FE column from Y to N.
BAAQMD 8-49-301	IV-CB	Rule is not FE. Change FE column from Y to N and insert SIP row.
BAAQMD 8-51-114	IV-CB	Rule is FE. Insert Y in blank FE column.

Corrections To Federal Enforceability of Applicable BAAQMD Requirements		
Referenced Regulation	Title V Table	Action
BAAQMD 8-51-115	IV-CB	Rule is FE. Insert Y in blank FE column.
BAAQMD 8-51-125	IV-CB	Rule is FE. Insert Y in blank FE column.
BAAQMD 8-51-126	IV-CB VII-BN	Rule is FE. Insert Y in blank FE column.
BAAQMD 9-1-313	IV-AQ IV-DV	Sections of 9-1-313 are FE, but not in entirely. In FE column, change Y to N.
BAAQMD 9-1-313.2	IV-DV VII-AI VII-CW	Rule is not FE. In Table DV, FE column correctly indicates N; however, need to insert SIP row. In Table VII-AI, change FE column from Y to N. In Table VII-CW, change FE column from Y to N.
BAAQMD 9-2-301	VII-CW	Rule is not FE (no SIP rule). Change FE column from Y to N.
BAAQMD 9-2-501	IV-DV VII-CW	Rule is not FE (no SIP rule). Need to Insert N in blank cell
BAAQMD 9-3-303	IV-CU	Rule is not FE (no SIP rule). Change FE column from Y to N
BAAQMD 9-10-502	IV-AY IV-AZ IV-BA IV-BC IV-BD IV-BK IV-BL IV-BZ IV-CS IV-CU	Rule is not FE (no SIP rule). Change FE from Y to N.

Corrections To Federal Enforceability of Applicable BAAQMD Requirements		
Referenced Regulation	Title V Table	Action
BAAQMD 9-10-502.1	IV-AY IV-AZ IV-BA IV-BC IV-BD IV-BG IV-BK IV-BL IV-BZ IV-CS IV-CU	Rule is not FE (no SIP rule). Change FE from Y to N.
BAAQMD 9-10-504 and 505	IV-AY IV-AZ IV-BA IV-BC IV-BD IV-BG IV-BG IV-BK IV-BL IV-BZ IV-CS IV-CU	Rule is not FE (no SIP rule). Change FE column from Y to N.
BAAQMD 11-2-301 -302 -303 -304 -305 -501 -502 -503 -504	IV-DV	Rule is not FE (no SIP rule). However NESHAP Subpart M is delegated through BAAQMD, possibly through this rule. Unclear if Ys are correct.
BAAQMD 11-12	IV-AU IV-CG IV-DT IV-DU	Rule is not FE (no SIP rule). However NESHAP Subpart M is delegated through BAAQMD, possibly through this rule. Unclear if Ys are correct.

Corrections To Federal Enforceability of Applicable BAAQMD Requirements		
Referenced Regulation	Title V Table	Action
SIP 1-522	IV-AP IV-AQ IV-AZ IV-BB IV-BC IV-BF IV-BJ IV-BK IV-CU IV-CV IV-CW	Refer to BAAQMD 1-522. Also, the Y in the FE column has a 2 footnote. Remove the 2 footnote.
SIP 01-523	IV-AX IV-AY IV-AZ IV-BB IV-BC IV-BF IV-BJ IV-BK IV-CF  IV-CS IV-CU IV-CV IV-CW IV-CY	Refer to BAAQMD 1-523. Also, the Y in the FE column has a 2 footnote. Remove the 2 footnote. 
SIP 8-4-302	IV-CB VII-BN	In table IV-CB, the Y in the FE column has a 1 footnote. Remove the 1 footnote. This rule is not FE and is appropriately referenced in Table IV-CB. However, Table VII-BN is incorrect, change FE column from Y to N.
SIP 8-4-501	IV-CB	Refer to BAAQMD 8-4-501.
SIP 8-7-301	IV-BN	Delete row
SIP 8-7-301.1	IV-BN	Delete row
SIP 8-7-301.2	IV-BN	Delete row
SIP 8-7-301.6	IV-BN	Delete row
SIP 8-7-301.7	IV-BN	Delete row
SIP 8-7-302.1 thru 302.5		Delete rows
SIP 8-7-304	IV-BN	Delete row
SIP 8-7-307	IV-BN	Delete row

Corrections To Federal Enforceability of Applicable BAAQMD Requirements		
Referenced Regulation	Title V Table	Action
SIP 8-7-312	IV-BN	Delete row (BAAQMD 8-7-312 is not referenced in Table IV-BN)
SIP 8-7-401	IV-BN	Delete row
SIP 8-7-501	IV-BN	Delete row

Attachment E

Shell Martinez Refinery

Future Effective Dates

Prepared September 22, 2003

A list of Corrections to Future Effective Dates was submitted in July 2003. This list is amended below and replaces the list submitted in the July 2003 submittal. The future effective dates listed in the table below should be deleted. There may be other future effective dates that have also past, but are not identified below.

CORRECTIONS TO 'FUTURE EFFECTIVE DATES'			
Table	Applicable Requirements	Future Effective Date Currently Listed	Recommendation
IV-G	BAAQMD Condition #18646 Parts 1-4	1/1/03	Delete date and leave cells blank
IV-AN	BAAQMD Condition #18643 Parts 2-6	1/1/03	Delete date and leave cells blank
IV-ANb	BAAQMD Condition #18643 Parts 2-7	1/1/03	Delete date and leave cells blank. Note that Part 7 should be deleted in its entirety as it is redundant to the NSPS rule. (See Section I Priority Comments of this letter)
IV-AZ	BAAQMD Regulation 9, Rule 10 Parts 301 – 505	7/1/02	Delete date and leave cells blank
IV-BB	BAAQMD Regulation 9, Rule 10 Parts 301 – 505	7/1/02	Delete date and leave cells blank
IV-BJ	BAAQMD Regulation 9, Rule 10 Parts 304 – 505	7/1/02	Delete date and leave cells blank
IV-BK	BAAQMD Regulation 9, Rule 10 Parts 301 – 505	7/1/02	Delete date and leave cells blank

CORRECTIONS TO 'FUTURE EFFECTIVE DATES'			
Table	Applicable Requirements	Future Effective Date Currently Listed	Recommendation
IV-CS	BAAQMD Regulation 9, Rule Parts 301 and 301.1	7/1/02	Delete date and leave cells blank
VII-F	BAAQMD Condition # 18646 Parts 1, 2a, 2bi, 2bii	1/1/03	Delete date and leave cells blank
VII-AP	BAAQMD 9-10-301 BAAQMD 9-10-305	7/1/02	Delete date and leave cells blank
VII-BW	BAAQMD Condition #6707 Parts 1, 2a, 2bi, 2bii	1/1/03	Delete date and leave cells blank
VII-CE	BAAQMD 9-10-305	7/1/02	Delete date and leave cells blank

Attachment F

MACT Subpart UUU Additions to Title V

The current draft version of the Title V Permit does not include the applicable requirements for the new Refinery MACT regulation, which was promulgated on April 11, 2002. This regulation, 40 CFR Part 63, Subpart UUU, establishes HAP emission limitations, work practice standards, and other requirements for HAP emissions from catalytic cracking units (CCUs), catalytic reforming units (CRUs), and sulfur recovery units (SRUs) at major source refineries.

The following sources at the Shell Martinez refinery are subject to this subpart:

- S1426 – CP Catalytic Cracking Unit (CCU)
- S1425 – DH Catalytic Reformer Unit (CRU)
- S1431 – CP Sulfur Plant 1 (SRU1)
- S1432 – CP Sulfur Plant 2 (SRU2)
- S1765– OPCEN Sulfur Plant3 (SRU3)
- S4180 – OPCEN Sulfur Plant 4 (SRU4)

Attached is a series of items to be inserted into the appropriate tables in the Title V Permit. Included are source-specific applicable requirements for Section IV, applicable limits and compliance monitoring requirements for Section VII, and permit shield items for Section IX.

Note that, although the Catalytic Cracking Unit (S1426) and Sulfur Plants 1 and 2 (S1431 and S1432) predate the New Source Performance Standard (NSPS) for refineries (40 CFR Part 60, Subpart J), these sources are subject to this standard as a result of the consent decree between Shell and the USEPA in March of 2001. As initial performance testing has not been conducted on these units, the testing requirements of both NSPS Subpart J and MACT Subpart UUU need to be included in the Title V permit. Also, the citations for the emission limitations for these sources are specified as “elect to meet NSPS standard,” rather than “subject to NSPS,” because the sections of Subpart UUU dealing with sources that are “subject to NSPS” presume that all testing and other NSPS requirements have been fulfilled.

The following items must be incorporated into the appropriate tables of the Title V Permit prior to issuing the permit.

A. Required Modifications to Section IV

1. Refinery MACT II for Catalytic Cracker. The provisions of Refinery MACT II (40 CFR Part 63, Subpart UUU) for the catalytic cracker (S-1426) are not included in the draft Title V Permit. Part 63, Subpart A requirements must also be incorporated into the Permit. Please insert the following rows in Table IV-AP.

Table IV – AP
Source-specific Applicable Requirements
S1426 – CP Catalytic Cracking Unit (CCU)

40 CFR Part 63 Subpart A	MACT General Provisions	Federally Enforceable (Y/N)	Future Effective Date
63.4	Prohibited Activities and Circumvention	Y	4/11/05
63.6	Compliance with Standards and Maintenance Requirements	Y	4/11/05
63.6(e)	Operation and Maintenance Requirements	Y	4/11/05
63.6(f)	Compliance with Nonopacity Emission Standards	Y	4/11/05
63.6(g)	Use of Alternative Nonopacity Emission Standard (optional)	Y	4/11/05
63.6(h)	Compliance with Opacity and Visible Emission Standards	Y	4/11/05

Table IV – AP
Source-specific Applicable Requirements
S1426 – CP Catalytic Cracking Unit (CCU)

63.7	Performance Tests	Y	9/8/05
63.8	Monitoring	Y	4/11/05
63.9	Notifications		
63.9(e)	Notification of Performance Test	Y	30 days before test
63.9(g)	Notification Requirements for sources with Continuous Monitoring Systems	Y	Simultaneous with notice of performance test
63.9(h)	Notification of Compliance Status	Y	5/11/05 and Subsequent
63.9(j)	Change in information already provided	Y	4/11/05
63.10	Recordkeeping and Reporting Requirements	Y	4/11/05
63.10(a)	General Information	Y	4/11/05
63.10(b)	General Recordkeeping Requirements	Y	4/11/05
63.10(b)(2)	Records to be maintained	Y	4/11/05
63.10(c)	Recordkeeping requirements for Continuous Monitoring Systems	Y	4/11/05
63.10(d)	General Reporting Requirements	Y	4/11/05
63.10(e)	Additional reports for sources with Continuous Monitoring Systems	Y	4/11/05
63.10(e)(2)	Reporting results of Continuous Monitoring System performance evaluation	Y	9/8/05
63.10(e)(3)	Excess Emissions and Continuous Monitoring System Performance Report and Summary Report	Y	4/11/05
63.10(e)(4)	Reporting COMS data produced during performance test	Y	9/8/05
40 CFR 63 Subpart UUU	NESHAP for Petroleum Refineries: Catalytic Cracking Units	Federally Enforceable (Y/N)	Future Effective Date
63.1564	Requirements for metal HAP emissions from catalytic cracking units	Y	4/11/05
63.1564(a)	Emission Limitations and Work Practice Standards	Y	4/11/05
63.1564(a)(1)(i)	PM Emission Limitation for catalytic cracking units electing to meet NSPS limit (Option 1): PM emissions must not exceed 1 lb per 1,000 lb of coke burn-off, plus 0.1 lb/MMBtu of heat input to the CO boiler; and opacity must not exceed 30% except for one 6-minute opacity reading in any one hour (Table 1, Item 2)	Y	4/11/05
63.1564(a)(3)	Prepare Operation, Maintenance, and Monitoring Plan and operate at all times according to the procedures in the plan	Y	4/11/05
63.1564(b)	Initial Compliance Demonstration	Y	4/11/05
63.1564(b)(1)	Install Continuous Opacity Monitoring System (Table 3, Item 2)	Y	4/11/05
63.1564(b)(2)	Performance Test (Table 4, Items 1.a through 1.e, 2.a through 2.c)	Y	9/8/05
63.1564(b)(4)(i)	Compute PM emission rate (lb/1,000 lb coke burn-off rate) for each Performance Test run	Y	9/8/05
63.1564(b)(5)	Initial Compliance Demonstration: Calculate PM emission rate using Equations 1, 2 and 3 of 63.1564(b)(4)(i); Opacity limit met; Continuous Opacity Monitoring System meets applicable requirements (Table 5, Item 2)	Y	9/8/05
63.1564(b)(6)	Demonstrate initial compliance with work practice standard by submitting Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1564(b)(7)	Submit Notification of Compliance Status	Y	5/11/05
63.1564(c)	Continuous Compliance Demonstration	Y	4/11/05
63.1564(c)(1)	Demonstration of continuous compliance with emission limitation: Record daily the average coke burn-off rate; maintain PM emission rate below limit; record daily the rate of fuel combustion and hours of fuel combustion; maintain PM emissions from fuel combustion below limits; collect continuous opacity monitoring data and maintain opacity within limit (Table 6, Item 2)	Y	4/11/05

**Table IV – AP
Source-specific Applicable Requirements
S1426 – CP Catalytic Cracking Unit (CCU)**

63.1564(c)(2)	Demonstration of continuous compliance with work practice standard by maintaining records to document conformance with Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1565	Requirements for organic HAP emissions from catalytic cracking units	Y	4/11/05
63.1565(a)	Emission Limitations and Work Practice Standards	Y	4/11/05
63.1565(a)(1)(i)	Emission limitation for catalytic cracking units electing to meet NSPS standard (Option 1): CO emissions from CO boiler must not exceed 500 ppmvd (Table 8, Item 2.a)	Y	4/11/05
63.1565(a)(3)	Prepare Operation, Maintenance, and Monitoring Plan and operate at all times in accordance with the plan	Y	4/11/05
63.1565(b)	Initial Compliance Demonstration	Y	4/11/05
63.1565(b)(1)	Install, operate and maintain Continuous Emission Monitoring System to measure and record the concentration of CO emissions (Table 10, Item 2.b)	Y	4/11/05
63.1565(b)(2)	Performance Test (Table 11, Items 1.a through 1.d, 2)	Y	9/8/05
63.1565(b)(4)	Demonstrate initial compliance with CO limit: hourly CO emissions over 24-hour period of performance test not more than 500 ppmvd; performance evaluation shows CEMS meets applicable requirements (Table 12, Item 2.a.ii)	Y	9/8/05
63.1565(b)(5)	Demonstrate initial compliance with work practice standard by submitting Operation, Maintenance, and Monitoring Plan as part of NOCS.	Y	5/11/05
63.1565(b)(6)	Submit Notice of Compliance Status.	Y	5/11/05
63.1565(c)	Continuous Compliance Demonstration	Y	4/11/05
63.1565(c)(1)	Demonstrate continuous compliance with emission limitation by collecting hourly average CO monitoring data and maintaining hourly average CO concentrations within limit (Table 13, Item 2.i)	Y	4/11/05
63.1565(c)(2)	Demonstrate continuous compliance with work practice standard by maintaining records to document conformance with Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1569	Bypass Lines	Y	4/11/05
63.1569(a)	Work Practice Standards for Bypass Lines	Y	4/11/05
63.1569(a)(1)(i)	Work Practice Standard (Option 1): Install and operate a device (Level Indicator) to continuously detect, at least every hour, whether flow is present in bypass line. (Table 36, Item 1)	Y	4/11/05
63.1569(a)(3)	Prepare Operation, Maintenance, and Monitoring Plan and operate at all times according to the procedures in the plan	Y	4/11/05
63.1569(b)	Initial Compliance Demonstration	Y	4/11/05
63.1569(b)(1)	Performance Test for level monitor: record during the performance test whether the level recorder was operating and whether flow was detected at any time (Table 37, Item 1)	Y	9/8/05
63.1569(b)(2)	Demonstrate Initial Compliance with work practice standard during performance test (Option 1): equipment operates properly during each performance test run (Table 38, Item 1.a)	Y	9/8/05
63.1569(b)(3)	Submit Operation, Maintenance, and Monitoring Plan as part of NOCS	Y	5/11/05
63.1569(b)(4)	Submit Notice of Compliance Status	Y	5/11/05
63.1569(c)	Continuous Compliance Demonstration	Y	4/11/05
63.1569(c)(1)	Demonstrate continuous compliance with (Option 1): Continuously monitor and record whether flow is present in bypass line; record whether device is operating properly (Table 39, Item 1)	Y	4/11/05
63.1569(c)(2)	Demonstrate continuous compliance with Work Practice Standard by complying with procedures in Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1570	General Compliance Requirements	Y	4/11/05
63.1570(a)	Operate in compliance with non-opacity standards at all times except	Y	4/11/05

**Table IV – AP
Source-specific Applicable Requirements
S1426 – CP Catalytic Cracking Unit (CCU)**

	during periods of startup, shutdown, and malfunction, as specified in 63.6(f)(1)		
63.1570(b)	Operate in compliance with opacity and visible emissions standards at all times except during periods of startup, shutdown, and malfunction, as specified in 63.6(h)(1)	Y	4/11/05
63.1570(c)	Operate and maintain source including pollution control and monitoring equipment in accordance with 63.6(e)(1). Between 4/11/05 and the date continuous monitoring systems are installed and validated and operating limits have been set, maintain a log detailing operation and maintenance of process and equipment.	Y	4/11/05
63.1570(d)	Develop and implement startup, shutdown, and malfunction plan (SSMP) in accordance with 63.6(e)(3)	Y	4/11/05
63.1570(e)	Operate in accordance with SSMP during periods of startup, shutdown, and malfunction	Y	4/11/05
63.1570(f)	Report deviations from compliance with this subpart according to the requirements of 63.1575	Y	4/11/05
63.1570(g)	Deviations that occur during startup, shutdown, or malfunction are not violations if operating in accordance with SSMP	Y	4/11/05
63.1571	Performance Tests		
63.1571(a)	Conduct Performance Test and submit results no later than 150 days after compliance date	Y	9/8/05
63.1571(a)(1)	For emission limitation or work practice standard where compliance not demonstrated using performance test, opacity observation, or visible emission observation, conduct initial compliance demonstration within 30 days after compliance date	Y	5/11/05
63.1571(b)	Requirements for Performance Tests	Y	9/8/05
63.1571(b)(1)	Conduct performance tests in accordance with the requirements of 63.7(e)(1)	Y	9/8/05
63.1571(b)(2)	Except for opacity and visual emissions observations, conduct three separate test runs of at least an hour for each performance test	Y	9/8/05
63.1571(b)(3)	Conduct each performance evaluation in accordance with the requirements of 63.8(e)	Y	9/8/05
63.1571(b)(4)	Performance tests not conducted during periods of startup, shutdown, or malfunction	Y	9/8/05
63.1571(b)(5)	Arithmetic average of emission rates	Y	9/8/05
63.1572	Monitoring installation, operation, and maintenance requirements	Y	4/11/05
63.1572(a)	Requirements for installation, operation, and maintenance of continuous emission monitoring system	Y	4/11/05
63.1572(a)(1)	CO CEMS must meet requirements of Performance Specification 4 (40 CFR Part 60, App B) (Table 40, Item 2)	Y	4/11/05
63.1572(a)(2)	Conduct performance evaluation for CO CEMS according to Performance Specification 4 (Table 40, Item 2)	Y	9/8/05
63.1572(a)(3)	CEMS complete one cycle of operation for each 15-minute period	Y	4/11/05
63.1572(a)(4)	Data reduction per 63.8(g)(2)	Y	4/11/05
63.1572(b)	Requirements for installation, operation, and maintenance of continuous opacity monitoring system	Y	4/11/05
63.1572(b)(1)	COMS must meet requirements of Performance Specification 1 (40 CFR Part 60, App B) (Table 40, Item 1)	Y	4/11/05
63.1572(b)(2)	Conduct performance evaluation for CO CEMS according to Performance Specification 1	Y	9/8/05
63.1572(b)(3)	COMS complete one cycle of sampling and analyzing for each 10-second period and one cycle of data recording for each 6-minute period	Y	4/11/05
63.1572(d)	Data monitoring and collection requirements	Y	4/11/05
63.1572(d)(1)	Conduct monitoring at all times, except for monitoring malfunctions, repairs, and QA/QC activities	Y	4/11/05

**Table IV – AP
Source-specific Applicable Requirements
S1426 – CP Catalytic Cracking Unit (CCU)**

63.1572(d)(2)	Data recorded during monitoring malfunctions, repairs, and QA/QC activities not used for compliance purposes	Y	4/11/05
63.1573	Monitoring Alternatives	Y	4/11/05
63.1573(d)	Monitoring for alternative parameters (optional)	Y	4/11/05
63.1573(e)	Alternative Monitoring Requests (optional)	Y	4/11/05
63.1574	Notification Requirements	Y	4/11/05
63.1574(a)	Notifications Required by Subpart A	Y	5/11/05 and subsequent
63.1574(a)(2)	Submit notification of intent to conduct performance test 30 days before scheduled (instead of 60 days)	Y	30 days before test
63.1574(a)(3)	Notification of Compliance Status	Y	5/11/05
63.1574(a)(3)(i)	Submit Notification of Compliance Status for initial compliance demonstration that does not include a performance test, no later than 30 days following completion of initial compliance demonstration	Y	5/11/05
63.1574(a)(3)(ii)	Submit Notification of Compliance Status for initial compliance demonstration that includes a performance test, no later than 150 days after source compliance date	Y	9/8/05
63.1574(d)	Information to be Submitted in Notice of Compliance Status (Table 42): identification of affected sources and emission points (Item 1); initial compliance demonstration (Item 2); continuous compliance (Item 3)	Y	5/11/05
63.1574(f)	Requirement to prepare Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1574(f)(1)	Submit plan to permitting authority for review and approval along with NOCS. Include duty to prepare and implement plan into Part 70 or 71 permit.	Y	5/11/05
63.1574(f)(2)	Minimum contents of Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1575	Reports	Y	4/11/05
63.1575(a)	Required reports: Statement that there were no deviations or report including information in 1575(d) or (e) (Table 43, Item 1)	Y	7/31/05
63.1575(b)	Specified semiannual report submittal dates	Y	7/31/05
63.1575(c)	Information required in compliance report	Y	7/31/05
63.1575(d)	Information required for deviations from emission limitations and work practice standards where CEMS or COMS is not used to comply with emission limitation or work practice standard	Y	7/31/05
63.1575(e)	Information required for deviations from emission limitations and work practice standards where CEMS or COMS is used to comply with emission limitation or work practice standard	Y	7/31/05
63.1575(f)	Additional information for compliance reports	Y	7/31/05
63.1575(f)(1)	Requirement to submit performance test reports	Y	1/31/06
63.1575(f)(2)	Submittal of requested change in the applicability of an emission standard	Y	7/31/05
63.1575(g)	Submittal of reports required by other regulations in place of or as part of compliance report if they contain the required information	Y	4/11/05
63.1575(h)	Reporting requirements for startups, shutdowns, and malfunctions	Y	4/11/05
63.1576	Recordkeeping	Y	4/11/05
63.1576(a)	Required Records – General	Y	4/11/05
63.1576(b)	Records for CEMS and COMS	Y	4/11/05
63.1576(c)	Records of visible emissions observations	Y	4/11/05
63.1576(d)	Records required by Tables 6, 7, 13, and 14 of Subpart UUU	Y	4/11/05
63.1576(e)	Maintain copy of Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1576(f)	Records of changes that affect emission control system performance	Y	4/11/05
63.1576(g)	Records in a form suitable and readily available for review	Y	4/11/05
63.1576(h)	Maintain records for 5 years	Y	4/11/05
63.1576(i)	Records onsite for two years; may be maintained offsite for remaining 3 years	Y	4/11/05

2. Refinery MACT II for Catalytic Reformer. The provisions of Refinery MACT II (40 CFR Part 63, Subpart UUU) for the catalytic reformer (S1425) are not included in the draft Title V Permit. Part 63, Subpart A requirements must also be incorporated into the Permit. Remove S1425 from Table IV-AL and create a new table, IV-ALa. Copy all provisions from Table IV-AL to IV-ALa and add the following rows.

Table IV - ALa
Source-specific Applicable Requirements
S1425 – DH Catalytic Reformer Unit (CRU)

40 CFR Part 63 Subpart A	MACT General Provisions	Federally Enforceable (Y/N)	Future Effective Date
63.4	Prohibited Activities and Circumvention	Y	4/11/05
63.6	Compliance with Standards and Maintenance Requirements	Y	4/11/05
63.6(e)	Operation and Maintenance Requirements	Y	4/11/05
63.6(f)	Compliance with Nonopacity Emission Standards	Y	4/11/05
63.6(g)	Use of Alternative Nonopacity Emission Standard (optional)	Y	4/11/05
63.7	Performance Tests	Y	9/8/05
63.8	Monitoring	Y	4/11/05
63.9	Notifications	Y	4/11/05
63.9(e)	Notification of Performance Test	Y	30 days before test
63.9(g)	Notification Requirements for sources with Continuous Monitoring Systems	Y	Simultaneous with notice of performance test
63.9(h)	Notification of Compliance Status	Y	5/11/05 and Subsequent
63.9(j)	Change in information already provided	Y	4/11/05
63.10	Recordkeeping and Reporting Requirements	Y	4/11/05
63.10(a)	General Information	Y	4/11/05
63.10(b)	General Recordkeeping Requirements	Y	4/11/05
63.10(b)(2)	Records to be maintained	Y	4/11/05
63.10(c)	Recordkeeping requirements for Continuous Monitoring Systems	Y	4/11/05
63.10(d)	General Reporting Requirements	Y	4/11/05
63.10(e)	Additional reports for sources with Continuous Monitoring Systems	Y	4/11/05
63.10(e)(2)	Reporting results of Continuous Monitoring System performance evaluation	Y	9/8/05
63.10(e)(3)	Excess Emissions and Continuous Monitoring System Performance Report and Summary Report	Y	4/11/05
40 CFR 63 Subpart UUU	NESHAP for Petroleum Refineries: Catalytic Reforming Units	Federally Enforceable (Y/N)	Future Effective Date
63.1567	Requirements for Inorganic HAP Emissions from Catalytic Reforming Units	Y	4/11/05
63.1567(a)	Emission Limitations and Work Practice Standards	Y	4/11/05
63.1567(a)(1)	Sulfur Emission Limitations for Hydrogen Chloride (HCl) during coke burn-off and catalyst rejuvenation using wet scrubber: Reduce uncontrolled HCl emissions by 97% or to a concentration of 10 ppmvd corrected to 3%O ₂ (Table 22 Item 2)	Y	4/11/05
63.1567(a)(2)	Operating limits for daily average pH of water and average liquid-to-gas ratio exiting wet scrubber during coke burn-off and catalyst rejuvenation: daily average pH of scrubbing liquid not fall below the limit established during performance test; daily average liquid-to-gas ratio not to fall below the limit established during performance test (Table 23 Item 1.a)	Y	9/8/05
63.1567(a)(3)	Prepare Operation, Maintenance, and Monitoring Plan and operate in	Y	4/11/05

Table IV - ALa
Source-specific Applicable Requirements
S1425 – DH Catalytic Reformer Unit (CRU)

	compliance with the plan		
63.1567(b)	Initial Compliance Demonstration	Y	4/11/05
63.1567(b)(1)	Install Continuous Parameter Monitoring System to record pH of water and liquid and gas flow rate to scrubber (Table 24, Item 1)	Y	4/11/05
63.1567(b)(2)	Performance Test: measure HCl concentration at the outlet (for the concentration standard) or at the inlet and outlet (for the percent reduction standard) of the scrubber (Table 25, Item 1.a)	Y	9/8/05
63.1567(b)(3)	Establish Operating Limit: measure and record pH of scrubbing liquid and gas and liquid flow rate every 15 minutes during the performance test. Determine hourly average. (Table 25, Items 1.b and 1.c)	Y	9/8/05
63.1567(b)(4)	Demonstrate Initial Compliance with Emission Limitations: reduce HCl concentration by 97% or to 10 ppmv (Table 26, Item 2)	Y	9/8/05
63.1567(b)(5)	Demonstrate Initial Compliance with Work Practice Standard by submitting Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1567(b)(6)	Submit Notice of Initial Compliance Status	Y	5/11/05
63.1567(c)	Continuous Compliance Demonstration	Y	4/11/05
63.1567(c)(1)	Demonstrate Continuous Compliance with Emission Limitation: maintain 97% control efficiency or 10 ppmv HCl concentration (Table 27, Item 2) and collect hourly and daily pH monitoring data and hourly average liquid-to-gas ratio, and maintain both above the operating limit established during performance test (Table 28, Items 1.a and 1.b)	Y	9/8/05
63.1567(c)(2)	Demonstrate Continuous Compliance with Work Practice Standard through maintaining records to document conformance with the Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1570	General Compliance Requirements	Y	4/11/05
63.1570(a)	Operate in compliance with non-opacity standards at all times except during periods of startup, shutdown, and malfunction, as specified in 63.6(f)(1)	Y	4/11/05
63.1570(c)	Operate and maintain source including pollution control and monitoring equipment in accordance with 63.6(e)(1). Between 4/11/05 and the date continuous monitoring systems are installed and validated and operating limits have been set, maintain a log detailing operation and maintenance of process and equipment.	Y	4/11/05
63.1570(d)	Develop and implement startup, shutdown, and malfunction plan (SSMP) in accordance with 63.6(e)(3)	Y	4/11/05
63.1570(e)	Operate in accordance with SSMP during periods of startup, shutdown, and malfunction	Y	4/11/05
63.1570(f)	Report deviations from compliance with this subpart according to the requirements of 63.1575	Y	4/11/05
63.1570(g)	Deviations that occur during startup, shutdown, or malfunction are not violations if operating in accordance with SSMP	Y	4/11/05
63.1571	Performance Tests	Y	4/11/05
63.1571(a)	Conduct Performance Test and submit results no later than 150 days after compliance date	Y	9/8/05
63.1571(a)(1)	For emission limitation or work practice standard where compliance not demonstrated using performance test, opacity observation, or visible emission observation, conduct initial compliance demonstration within 30 days after compliance date	Y	5/11/05
63.1571(b)	Requirements for Performance Tests	Y	4/11/05
63.1571(b)(1)	Conduct performance tests in accordance with the requirements of 63.7(e)(1)	Y	9/8/05
63.1571(b)(2)	Except for opacity and visual emissions observations, conduct three separate test runs of at least an hour for each performance test	Y	9/8/05
63.1571(b)(3)	Conduct each performance evaluation in accordance with the requirements of 63.8(e)	Y	9/8/05
63.1571(b)(4)	Performance tests not conducted during periods of startup, shutdown,	Y	9/8/05

Table IV - ALa
Source-specific Applicable Requirements
S1425 – DH Catalytic Reformer Unit (CRU)

	or malfunction		
63.1571(b)(5)	Arithmetic average of emission rates	Y	9/8/05
63.1571(c)	Procedures for an Engineering Assessment (optional in lieu of performance test)	Y	5/11/05
63.1571(d)(4)	Adjust process or control device measured values when establishing operating limit (optional)	Y	9/8/05
63.1571(e)	Changes to Operating limits (optional)	Y	9/8/05
63.1572	Monitoring installation, operation, and maintenance requirements	Y	4/11/05
63.1572(c)	Continuous parameter monitoring requirements	Y	4/11/05
63.1572(c)(1)	Locate the air flow and liquid flow sensors and other necessary equipment that provides representative flow; use flow rate sensor with $\pm 5\%$ accuracy; reduce abnormal conditions due to up/down stream disturbances; conduct semiannual calibration (Table 41, Item 3); and locate pH sensor in a position that provides a representative measurement; ensure the sample is properly mixed and representative; check calibration every 8 hours; inspect all components; record inspection results (Table 41, Item 5)	Y	4/11/05
63.1572(c)(2)	Complete a minimum of one cycle for each 15-minute period; four cycles of operation for a valid hour of data	Y	4/11/05
63.1572(c)(3)	Valid hourly data at least 75% of process operating hours	Y	4/11/05
63.1572(c)(4)	Determine and record hourly and daily average of all recorded readings	Y	4/11/05
63.1572(c)(5)	Record results of inspection, calibration, and validation check	Y	4/11/05
63.1572(d)	Data monitoring and collection requirements	Y	4/11/05
63.1572(d)(1)	Conduct monitoring at all times source is operating except for monitoring malfunctions, repairs, and QA/QC activities	Y	4/11/05
63.1572(d)(2)	Not use data recorded during monitoring malfunctions, repairs, and QA/QC activities	Y	4/11/05
63.1573	Monitoring Alternatives	Y	4/11/05
63.1573(b)	Alternatives for monitoring for pH (Table 41, Item 5) (optional)	Y	4/11/05
63.1573(c)	Automated data compression system (optional)	Y	4/11/05
63.1573(d)	Monitoring for alternative parameters (optional)	Y	4/11/05
63.1573(e)	Alternative Monitoring Requests (optional)	Y	4/11/05
63.1574	Notification Requirements	Y	4/11/05
63.1574(a)	Notifications Required by Subpart A	Y	5/11/05 and subsequent
63.1574(a)(2)	Submit notification of intent to conduct performance test 30 days before scheduled (instead of 60 days)	Y	30 days before test
63.1574(a)(3)	Notification of Compliance Status	Y	5/11/05
63.1574(a)(3)(i)	Submit Notification of Compliance Status for initial compliance demonstration that does not include a performance test, no later than 30 days following completion of initial compliance demonstration	Y	5/11/05
63.1574(a)(3)(ii)	Submit Notification of Compliance Status for initial compliance demonstration that includes a performance test, no later than 150 days after source compliance date	Y	9/8/05
63.1574(d)	Information to be Submitted in Notice of Compliance Status (Table 42): identification of affected sources and emission points (Item 1); initial compliance demonstration (Item 2); continuous compliance (Item 3)	Y	5/11/05
63.1574(f)	Requirement to prepare Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1574(f)(1)	Submit plan to permitting authority for review and approval along with NOCS. Include duty to prepare and implement plan into Part 70 or 71 permit.	Y	5/11/05
63.1574(f)(2)	Minimum contents of Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1575	Reports	Y	7/31/05
63.1575(a)	Required reports: Statement that there were no deviations or report including information in 1575(d) or (e) (Table 43, Item 1)	Y	7/31/05

Table IV - ALa
Source-specific Applicable Requirements
S1425 – DH Catalytic Reformer Unit (CRU)

63.1575(b)	Specified semiannual report submittal dates	Y	7/31/05
63.1575(c)	Information required in compliance report	Y	7/31/05
63.1575(d)	Information required for deviations from emission limitations and work practice standards where CEMS or COMS is not used to comply with emission limitation or work practice standard	Y	7/31/05
63.1575(f)	Additional information for compliance reports	Y	7/31/05
63.1575(f)(1)	Requirement to submit performance test reports	Y	1/31/06
63.1575(f)(2)	Submittal of requested change in the applicability of an emission standard	Y	7/31/05
63.1575(g)	Submittal of reports required by other regulations in place of or as part of compliance report if they contain the required information	Y	7/31/05
63.1575(h)	Reporting requirements for startups, shutdowns, and malfunctions	Y	7/31/05
63.1576	Recordkeeping	Y	4/11/05
63.1576(a)	Required Records – General	Y	4/11/05
63.1576(d)	Records required by Tables 20, 21, 27, and 28 of Subpart UUU	Y	4/11/05
63.1576(e)	Maintain copy of Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1576(f)	Records of changes that affect emission control system performance	Y	4/11/05
63.1576(g)	Records in a form suitable and readily available for review	Y	4/11/05
63.1576(h)	Maintain records for 5 years	Y	4/11/05
63.1576(i)	Records onsite for two years; may be maintained offsite for remaining 3 years	Y	4/11/05

3. Refinery MACT II for Sulfur Recovery Units. The provisions of Refinery MACT II (40 CFR Part 63, Subpart UUU) for the Sulfur Recovery Units (SRU 1 – 4) (S1431, S1432, S1765, and S4180) are not included in the draft Title V Permit. Part 63, Subpart A requirements must also be incorporated into the Permit.

SRU 1 and 2 (S1431 and S1432) are subject to slightly different requirements of Subpart UUU and NSPS Subpart J than SRU 3 and 4 (S1765 and S4180). SRU 3 and 4 were subject to NSPS Subpart J upon construction, and have conducted all required source tests. SRU 1 and 2 predate Subpart J, and are only subject to this standard as a result of the consent decree between Shell and the USEPA in March of 2001. As initial performance testing has not been conducted on these units, the testing requirements of both NSPS Subpart J and MACT Subpart UUU must be included in the Title V permit. Also, the citations for the emission limitations for SRU 1 and 2 are specified as “elect to meet NSPS standard,” rather than “subject to NSPS.” Finally, SRU 1 and 2 have bypass lines which have been blind-flanged. The bypass line provisions of Subpart UUU must be included in the permit.

The variations in the requirements for the sulfur plant requires the creation of a new table. Remove SRU 3 and 4 from Table IV-AQ, and insert the following rows in Table IV-AQ.

Table IV – AQ
Source-specific Applicable Requirements
S1431 – CP SULFUR PLANT 1 (SRU1)
S1432 – CP SULFUR PLANT 2 (SRU2)

40 CFR Part 63 Subpart A	MACT General Provisions	Federally Enforceable (Y/N)	Future Effective Date
63.4	Prohibited Activities and Circumvention	Y	4/11/05
63.6	Compliance with Standards and Maintenance Requirements	Y	4/11/05
63.6(e)	Operation and Maintenance Requirements	Y	4/11/05
63.6(f)	Compliance with Nonopacity Emission Standards	Y	4/11/05
63.6(g)	Use of Alternative Nonopacity Emission Standard (optional)	Y	4/11/05
63.7	Performance Tests	Y	9/8/05
63.8	Monitoring	Y	4/11/05
63.9	Notifications	Y	4/11/05

Table IV – AQ
Source-specific Applicable Requirements
S1431 – CP SULFUR PLANT 1 (SRU1)
S1432 – CP SULFUR PLANT 2 (SRU2)

63.9(e)	Notification of Performance Test	Y	30 days before test
63.9(g)	Notification Requirements for sources with Continuous Monitoring Systems	Y	Simultaneous with notice of performance test
63.9(h)	Notification of Compliance Status	Y	5/11/05 and Subsequent
63.9(j)	Change in information already provided	Y	4/11/05
63.10	Recordkeeping and Reporting Requirements	Y	4/11/05
63.10(a)	General Information	Y	4/11/05
63.10(b)	General Recordkeeping Requirements	Y	4/11/05
63.10(b)(2)	Records to be maintained	Y	4/11/05
63.10(c)	Recordkeeping requirements for Continuous Monitoring Systems	Y	4/11/05
63.10(d)	General Reporting Requirements	Y	4/11/05
63.10(e)	Additional reports for sources with Continuous Monitoring Systems	Y	4/11/05
63.10(e)(2)	Reporting results of Continuous Monitoring System performance evaluation	Y	9/8/05
63.10(e)(3)	Excess Emissions and Continuous Monitoring System Performance Report and Summary Report	Y	4/11/05
40 CFR 63 Subpart UUU	NESHAP for Petroleum Refineries: Sulfur Recovery Units	Federally Enforceable (Y/N)	Future Effective Date
63.1568	Requirements for Sulfur Recovery Units	Y	4/11/05
63.1568(a)	Emission Limitations and Work Practice Standards for Sulfur Recovery Units	Y	4/11/05
63.1568(a)(1)	Emission Limitations	Y	4/11/05
63.1568(a)(1)(i)	Sulfur Emission Limitation from Claus sulfur recovery units electing to meet NSPS Limits: 250 ppmvd SO ₂ at 0% excess air. (Table 29, Item 2.a)	Y	4/11/05
63.1568(a)(3)	Prepare Operation, Maintenance, and Monitoring Plan and operate at all times according to the procedures in the plan	Y	4/11/05
63.1568(b)	Demonstrate Initial Compliance with Emission Limitation and Work Practice Standard	Y	4/11/05
63.1568(b)(1)	Continuous Emission Monitoring System to measure and record hourly average SO ₂ concentration, with O ₂ monitor to correct excess air concentration (Table 31, Item 2.a)	Y	4/11/05
63.1568(b)(2)	Performance Test: measure SO ₂ concentration using CEMS every 15 minutes for 24 hours and reduce the data to 1-hr averages (Table 32, Item 1)	Y	4/11/05
63.1568(b)(5)	Demonstrate Initial Compliance with Emission Limitation: Average SO ₂ emissions measured by CEMS in initial performance test not greater than 250 ppmvd at 0% excess O ₂ , and monitoring system meets applicable requirements (Table 33, Item 2.a)	Y	9/8/05
63.1568(b)(6)	Demonstrate initial compliance by submitting Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1568(b)(7)	Submit Notice of Compliance Status	Y	5/11/05
63.1568(c)	Demonstrate Continuous Compliance with Emission Limitation and Work Practice Standards	Y	4/11/05
63.1568(c)(1)	Demonstrate Continuous Compliance with Emission Limitation: collect hourly average SO ₂ monitoring data; maintain hourly average below applicable limit; determine and record each 12-hour concentration; report 12-hour concentration greater than applicable	Y	4/11/05

Table IV – AQ
Source-specific Applicable Requirements
S1431 – CP SULFUR PLANT 1 (SRU1)
S1432 – CP SULFUR PLANT 2 (SRU2)

	limitation (Table 34, Item 2.a)		
63.1568(c)(2)	Demonstrate Continuous Compliance with Work Practice Standards by complying with the procedures in Operation, Maintenance, and Monitoring Plan.	Y	4/11/05
63.1569	Bypass Lines	Y	4/11/05
63.1569(a)	Work Practice Standards for Bypass Lines	Y	4/11/05
63.1569(a)(1) (i)	Work Practice Standard: Option 3 – Install solid blind between flanges (Table 36, Item 3)	Y	4/11/05
63.1569(a)(3)	Prepare Operation, Maintenance, and Monitoring Plan and operate at all times according to the procedures in the plan	Y	4/11/05
63.1569(b)	Initial Compliance Demonstration	Y	5/11/05
63.1569(b)(2)	Initial Compliance Demonstration: as part of Notification of Compliance Status, certify that equipment is installed, the equipment operational by compliance date, and identify the type of equipment installed. (Table 38, Item 1.c)	Y	5/11/05
63.1569(b)(3)	Submit Operation, Maintenance, and Monitoring Plan as part of NOCS	Y	5/11/05
63.1569(b)(4)	Submit Notification of Compliance Status	Y	4/11/05
63.1569(c)	Continuous Compliance Demonstration	Y	4/11/05
63.1569(c)(1)	Visually inspect the blind at least once a month and record whether the blind is maintained in the correct position (Table 39, Item 3)	Y	4/11/05
63.1569(c)(2)	Comply with procedures in Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1570	General Compliance Requirements	Y	4/11/05
63.1570(a)	Operate in compliance with non-opacity standards at all times except during periods of startup, shutdown, and malfunction, as specified in 63.6(f)(1)	Y	4/11/05
63.1570(c)	Operate and maintain source including pollution control and monitoring equipment in accordance with 63.6(e)(1). Between 4/11/05 and the date continuous monitoring systems are installed and validated and operating limits have been set, maintain a log detailing operation and maintenance of process and equipment.	Y	4/11/05
63.1570(d)	Develop and implement startup, shutdown, and malfunction plan (SSMP) in accordance with 63.6(e)(3)	Y	4/11/05
63.1570(e)	Operate in accordance with SSMPP during periods of startup, shutdown, and malfunction	Y	4/11/05
63.1570(f)	Report deviations from compliance with this subpart according to the requirements of 63.1575	Y	4/11/05
63.1570(g)	Deviations that occur during startup, shutdown, or malfunction are not violations if operating in accordance with SSMP	Y	4/11/05
63.1571	Performance Tests	Y	5/11/05
63.1571(a)	Conduct Performance Test and submit results no later than 150 days after compliance date	Y	9/8/05
63.1571(a)(1)	For emission limitation or work practice standard where compliance not demonstrated using performance test, opacity observation, or visible emission observation, conduct initial compliance demonstration within 30 days after compliance date	Y	5/11/05
63.1571(b)	Requirements for Performance Tests	Y	9/8/05
63.1571(b)(1)	Conduct performance tests in accordance with the requirements of 63.7(e)(1)	Y	9/8/05
63.1571(b)(2)	Conduct three separate test runs of at least an hour for each performance test	Y	9/8/05
63.1571(b)(3)	Conduct each performance evaluation in accordance with the requirements of 63.8(e)	Y	9/8/05
63.1571(b)(4)	Performance tests not conducted during periods of startup, shutdown,	Y	9/8/05

Table IV – AQ
Source-specific Applicable Requirements
S1431 – CP SULFUR PLANT 1 (SRU1)
S1432 – CP SULFUR PLANT 2 (SRU2)

	or malfunction		
63.1571(b)(5)	Arithmetic average of emission rates	Y	9/8/05
63.1572	Monitoring installation, operation, and maintenance requirements	Y	4/11/05
63.1572(a)	Requirements for installation, operation, and maintenance of continuous emission monitoring system	Y	4/11/05
63.1572(a)(1)	SO ₂ CEMS must meet requirements of Performance Specification 2 (40 CFR Part 60, App B) (Table 40, Item 4)	Y	4/11/05
63.1572(a)(2)	Conduct performance evaluation for SO ₂ CEMS according to Performance Specification 2 (Table 40, Item 4)	Y	9/8/05
63.1572(a)(3)	CEMS complete one cycle of operation for each 15-minute period	Y	4/11/05
63.1572(a)(4)	Data reduction per 63.8(g)(2)	Y	4/11/05
63.1572(d)	Data monitoring and collection requirements	Y	4/11/05
63.1572(d)(1)	Conduct monitoring at all times, except for monitoring malfunctions, repairs, and QA/QC activities	Y	4/11/05
63.1572(d)(2)	Data recorded during monitoring malfunctions, repairs, and QA/QC activities not used for compliance purposes	Y	4/11/05
63.1573	Monitoring Alternatives	Y	4/11/05
63.1573(d)	Monitoring for alternative parameters (optional)	Y	4/11/05
63.1573(e)	Alternative Monitoring Requests (optional)	Y	4/11/05
63.1574	Notification Requirements	Y	5/11/05
63.1574(a)	Notifications Required by Subpart A	Y	5/11/05 and subsequent
63.1574(a)(2)	Submit notification of intent to conduct performance test 30 days before scheduled (instead of 60 days)	Y	30 days before test
63.1574(a)(3)	Notification of Compliance Status	Y	5/11/05
63.1574(a)(3)(i)	Submit Notification of Compliance Status for initial compliance demonstration that does not include a performance test, no later than 30 days following completion of initial compliance demonstration	Y	5/11/05
63.1574(a)(3)(ii)	Submit Notification of Compliance Status for initial compliance demonstration that includes a performance test, no later than 150 days after source compliance date	Y	9/8/05
63.1574(d)	Information to be Submitted in Notice of Compliance Status (Table 42): identification of affected sources and emission points (Item 1); initial compliance demonstration (Item 2); continuous compliance (Item 3)	Y	5/11/05
63.1574(f)	Requirement to prepare Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1574(f)(1)	Submit plan to permitting authority for review and approval along with NOCS. Include duty to prepare and implement plan into Part 70 or 71 permit.	Y	5/11/05
63.1574(f)(2)	Minimum contents of Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1575	Reports	Y	7/31/05
63.1575(a)	Required reports: Statement that there were no deviations or report including information in 1575(d) or (e) (Table 43, Item 1)	Y	7/31/05
63.1575(b)	Specified semiannual report submittal dates	Y	7/31/05
63.1575(c)	Information required in compliance report	Y	7/31/05
63.1575(d)	Information required for deviations from emission limitations and work practice standards where CEMS or COMS is not used to comply with emission limitation or work practice standard	Y	7/31/05
63.1575(e)	Information required for deviations from emission limitations and work practice standards where CEMS or COMS is used to comply with emission limitation or work practice standard	Y	7/31/05
63.1575(f)	Additional information for compliance reports	Y	7/31/05
63.1575(f)(1)	Requirement to submit performance test reports	Y	1/31/06
63.1575(f)(2)	Submittal of requested change in the applicability of an emission	Y	7/31/05

Table IV – AQ
Source-specific Applicable Requirements
S1431 – CP SULFUR PLANT 1 (SRU1)
S1432 – CP SULFUR PLANT 2 (SRU2)

	standard		
63.1575(g)	Submittal of reports required by other regulations in place of or as part of compliance report if they contain the required information	Y	4/11/05
63.1575(h)	Reporting requirements for startups, shutdowns, and malfunctions	Y	7/31/05
63.1576	Recordkeeping	Y	4/11/05
63.1576(a)	Required Records – General	Y	4/11/05
63.1576(b)	Records for CEMS	Y	4/11/05
63.1576(d)	Records required by Tables 34 and 35 of Subpart UUU	Y	4/11/05
63.1576(e)	Maintain copy of Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1576(f)	Records of changes that affect emission control system performance	Y	4/11/05
63.1576(g)	Records in a form suitable and readily available for review	Y	4/11/05
63.1576(h)	Maintain records for 5 years	Y	4/11/05
63.1576(i)	Records onsite for two years; may be maintained offsite for remaining 3 years	Y	4/11/05

Create new Table IV – AQa with the same information as currently included in IV – AQ and insert the following rows:

Table IV – AQa
Source-specific Applicable Requirements
S1765– OPCEN SULFUR PLANT3 (SRU3)
S4180 – OPCEN SULFUR PLANT4 (SRU4)

40 CFR Part 63 Subpart A	MACT General Provisions	Federally Enforceable (Y/N)	Future Effective Date
63.4	Prohibited Activities and Circumvention	Y	4/11/05
63.6	Compliance with Standards and Maintenance Requirements	Y	4/11/05
63.6(e)	Operation and Maintenance Requirements	Y	4/11/05
63.6(f)	Compliance with Nonopacity Emission Standards	Y	4/11/05
63.6(g)	Use of Alternative Nonopacity Emission Standard (optional)	Y	4/11/05
63.8	Monitoring	Y	4/11/05
63.9	Notifications	Y	4/11/05
63.9(h)	Notification of Compliance Status	Y	5/11/05 and Subsequent
63.9(j)	Change in information already provided	Y	4/11/05
63.10	Recordkeeping and Reporting Requirements	Y	4/11/05
63.10(a)	General Information	Y	4/11/05
63.10(b)	General Recordkeeping Requirements	Y	4/11/05
63.10(b)(2)	Records to be maintained	Y	4/11/05
63.10(c)	Recordkeeping requirements for Continuous Monitoring Systems	Y	4/11/05
63.10(d)	General Reporting Requirements	Y	4/11/05
63.10(e)	Additional reports for sources with Continuous Monitoring Systems	Y	4/11/05
63.10(e)(2)	Reporting results of Continuous Monitoring System performance evaluation	Y	9/8/05
63.10(e)(3)	Excess Emissions and Continuous Monitoring System Performance Report and Summary Report	Y	4/11/05
40 CFR 63 Subpart UUU	NESHAP for Petroleum Refineries: Sulfur Recovery Units	Federally Enforceable (Y/N)	Future Effective Date
63.1568	Requirements for Sulfur Recovery Units	Y	4/11/05

Table IV – AQa
Source-specific Applicable Requirements
S1765– OPCEN SULFUR PLANT3 (SRU3)
S4180 – OPCEN SULFUR PLANT4 (SRU4)

63.1568(a)	Emission Limitations and Work Practice Standards for Sulfur Recovery Units	Y	4/11/05
63.1568(a)(1)	Sulfur Emission Limitation from Claus sulfur recovery units subject to NSPS: 250 ppmvd SO ₂ at 0% excess air (Table 29, Item 1.a)	Y	4/11/05
63.1568(a)(3)	Prepare Operation, Maintenance, and Monitoring Plan and operate at all times according to the procedures in the plan	Y	4/11/05
63.1568(b)	Demonstrate Initial Compliance with Emission Limitation and Work Practice Standard	Y	4/11/05
63.1568(b)(1)	Continuous Emission Monitoring System to measure and record hourly average SO ₂ concentration, with O ₂ monitor to correct excess air concentration (Table 31, Item 1.a)	Y	4/11/05
63.1568(b)(5)	Demonstrate Initial Compliance with Emission Limitation : Certification that vent meets NSPS SO ₂ limit; certification that CEMS meets applicable requirements of 63.1572. (Table 33, Item 1.a)	Y	5/11/05
63.1568(b)(6)	Demonstrate initial compliance by submitting Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1568(b)(7)	Submit Notice of Compliance Status	Y	5/11/05
63.1568(c)	Demonstrate Continuous Compliance with Emission Limitation and Work Practice Standards	Y	4/11/05
63.1568(c)(1)	Demonstrate Continuous Compliance with Emission Limitation: collect hourly average SO ₂ monitoring data; maintain hourly average below applicable limit; determine and record each 12-hour concentration; report 12-hour concentration greater than applicable limitation (Table 34, Item 1.a)	Y	4/11/05
63.1568(c)(2)	Demonstrate Continuous Compliance with Work Practice Standards by complying with the procedures in Operation, Maintenance, and Monitoring Plan.	Y	4/11/05
63.1570	General Compliance Requirements	Y	4/11/05
63.1570(a)	Operate in compliance with non-opacity standards at all times except during periods of startup, shutdown, and malfunction, as specified in 63.6(f)(1)	Y	4/11/05
63.1570(c)	Operate and maintain source including pollution control and monitoring equipment in accordance with 63.6(e)(1). Between 4/11/05 and the date continuous monitoring systems are installed and validated and operating limits have been set, maintain a log detailing operation and maintenance of process and equipment.	Y	4/11/05
63.1570(d)	Develop and implement startup, shutdown, and malfunction plan (SSMP) in accordance with 63.6(e)(3)	Y	4/11/05
63.1570(e)	Operate in accordance with SSMPP during periods of startup, shutdown, and malfunction	Y	4/11/05
63.1570(f)	Report deviations from compliance with this subpart according to the requirements of 63.1575	Y	4/11/05
63.1570(g)	Deviations that occur during startup, shutdown, or malfunction are not violations if operating in accordance with SSMP	Y	4/11/05
63.1572	Monitoring installation, operation, and maintenance requirements	Y	4/11/05
63.1572(a)	Requirements for installation, operation, and maintenance of continuous emission monitoring system	Y	4/11/05
63.1572(a)(1)	SO ₂ CEMS must meet requirements of Performance Specification 2 (40 CFR Part 60, App B) (Table 40, Item 4)	Y	4/11/05
63.1572(a)(3)	CEMS complete one cycle of operation for each 15-minute period	Y	4/11/05
63.1572(a)(4)	Data reduction per 63.8(g)(2)	Y	4/11/05
63.1572(d)	Data monitoring and collection requirements	Y	4/11/05
63.1572(d)(1)	Conduct monitoring at all times, except for monitoring malfunctions, repairs, and QA/QC activities	Y	4/11/05
63.1572(d)(2)	Data recorded during monitoring malfunctions, repairs, and QA/QC	Y	4/11/05

Table IV – AQa
Source-specific Applicable Requirements
S1765– OPCEN SULFUR PLANT3 (SRU3)
S4180 – OPCEN SULFUR PLANT4 (SRU4)

	activities not used for compliance purposes		
63.1573	Monitoring Alternatives	Y	4/11/05
63.1573(d)	Monitoring for alternative parameters (optional)	Y	4/11/05
63.1573(e)	Alternative Monitoring Requests (optional)	Y	4/11/05
63.1574	Notification Requirements	Y	4/11/05
63.1574(a)	Notifications Required by Subpart A	Y	5/11/05 and subsequent
63.1574(a)(3)	Notification of Compliance Status	Y	5/11/05
63.1574(d)	Information to be Submitted in Notice of Compliance Status (Table 42): identification of affected sources and emission points (Item 1); initial compliance demonstration (Item 2); continuous compliance (Item 3)	Y	5/11/05
63.1574(f)	Requirement to prepare Operation, Maintenance, and Monitoring Manual	Y	4/11/05
63.1574(f)(1)	Submit plan to permitting authority for review and approval along with NOCS. Include duty to prepare and implement plan into Part 70 or 71 permit.	Y	5/11/05
63.1574(f)(2)	Minimum contents of Operation, Maintenance, and Monitoring Plan	Y	5/11/05
63.1575	Reports	Y	4/11/05
63.1575(a)	Required reports: Statement that there were no deviations or report including information in 1575(d) or (e) (Table 43, Item 1)	Y	7/31/05
63.1575(b)	Specified semiannual report submittal dates	Y	7/31/05
63.1575(c)	Information required in compliance report	Y	7/31/05
63.1575(d)	Information required for deviations from emission limitations and work practice standards where CEMS or COMS is not used to comply with emission limitation or work practice standard	Y	7/31/05
63.1575(e)	Information required for deviations from emission limitations and work practice standards where CEMS or COMS is used to comply with emission limitation or work practice standard	Y	7/31/05
63.1575(f)	Additional information for compliance reports	Y	7/31/05
63.1575(f)(2)	Submittal of requested change in the applicability of an emission standard	Y	7/31/05
63.1575(g)	Submittal of reports required by other regulations in place of or as part of compliance report if they contain the required information	Y	4/11/05
63.1575(h)	Reporting requirements for startups, shutdowns, and malfunctions	Y	7/31/05
63.1576	Recordkeeping	Y	4/11/05
63.1576(a)	Required Records – General	Y	4/11/05
63.1576(b)	Records for CEMS	Y	4/11/05
63.1576(d)	Records required by Tables 34 and 35 of Subpart UUU	Y	4/11/05
63.1576(e)	Maintain copy of Operation, Maintenance, and Monitoring Plan	Y	4/11/05
63.1576(f)	Records of changes that affect emission control system performance	Y	4/11/05
63.1576(g)	Records in a form suitable and readily available for review	Y	4/11/05
63.1576(h)	Maintain records for 5 years	Y	4/11/05
63.1576(i)	Records onsite for two years; may be maintained offsite for remaining 3 years	Y	4/11/05

4. Delete Initial NSPS Requirements from Table AQa: Since SRU3 and SRU4 have completed the performance testing requirements under Subpart J, remove the following rows from Table AQa:

40 CFR 60 Subpart A	General Provisions (2/12/98)	Federally Enforceable (Y/N)	Future Effective Date
60.11(a)	Performance test	Y	
60. 106(a)	Use procedures and test methods in appendix A	Y	
60. 106(f)(1)	SO ₂ test method and compliance	Y	
60. 106(f)(3)	Oxygen concentration for excess air	Y	

B. Required Modifications to Section VII

1. **Refinery MACT II Applicable Limits and Monitoring Requirements for Catalytic Cracker.**

The applicable limits and monitoring requirements of Refinery MACT II (40 CFR Part 63, Subpart UUU) for the catalytic cracker (S-1426) are not included in the draft Title V Permit. Please insert the following rows in Table VII – AH.

Table VII – AH
Applicable Limits and Compliance Monitoring Requirements
S1426 – CP CATALYTIC CRACKING UNIT (CCU)

Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
PM (Surrogate for Metal HAPs)	MACT Subpart UUU 63.1564(a)(1)(i)	Y	4/11/05	PM emissions must not exceed 1.0 lb per 1000 lb of coke burn-off plus incremental emissions of 0.10 lb/MMBtu for auxiliary fuel	Subpart UUU 63.1564(b)(2) 63.1564(b)(4)(i) 63.1564(b)(5) 63.1564(c)(1) 63.1570(c) 63.1571(a)(1) 63.1571(b) 63.1574(a)(3)(i) 63.1574(d) 63.1575(a) 63.1575(b) 63.1575(c) 63.1575(d) 63.1575(f) 63.1576(a) 63.1576(d) 63.1576(f) 63.1576(g) 63.1576(h) 63.1576(i)	P/E (Initial Compliance demonstration; performance test, emission calculation, submit initial notifications and NOCS); P/D (operational records); P/Semi-Annual (compliance report); and C (maintain records)	Records, calculations, Performance Test, and Reports

Table VII – AH
Applicable Limits and Compliance Monitoring Requirements
S1426 – CP CATALYTIC CRACKING UNIT (CCU)

Opacity (Surrogate for Metal HAPs)	MACT Subpart UUU 63.1564(a)(1)(i)	Y	4/11/05	Opacity of emissions must not exceed 30%, except for one 6-minute opacity reading in any 1-hour period	63.1564(b)(1) 63.1564(c)(1) 63.1570(c) 63.1572(b) 63.1572(d) 63.1574(a)(3)(l) 63.1574(d) 63.1575(a) 63.1575(b) <hr/> 63.1575(c) 63.1575(d) 63.1576(a) 63.1576(b) 63.1576(c) 63.1576(d) 63.1576(f) <hr/> 63.1576(g) 63.1576(h) 63.1576(i)	P/E (Initial Compliance demonstration, COMS installation and performance test, submit initial notifications and NOCS), P/D (operational records), P/Semi-Annual (compliance report), and C (opacity monitoring, maintain records)	Records, Calculations, Continuous Opacity Monitor, monitor compliance demonstration, and Reports
CO (Surrogate for HAP VOC)	MACT Subpart UUU 63.1565(a)(1)	Y	4/11/05	CO emissions shall not exceed 500 ppmv	MACT Subpart UUU 63.1565(b)(1) 63.1565(b)(2) 63.1565(b)(4) 63.1565(b)(6) 63.1565(c) 63.1570(c) 63.1571(a)(1) 63.1571(b) 63.1572(a) 63.1572(d) 63.1574(a)(ii) 63.1574(d) 63.1575(a) 63.1575(b) 63.1575(c) 63.1575(e) 63.1575(f)(1) 63.1576(a) 63.1576(b) 63.1576(d) 63.1576(f) <hr/> 63.1576(g) 63.1576(h)	P/E (Initial Compliance Demonstration, performance test, CEMS installation and performance evaluation, submit initial notifications and NOCS), P/Semi-Annual (compliance report), and C (emissions monitoring, maintain records)	Records, Performance Test, and CO CEM

2. **Refinery MACT II Applicable Limits and Monitoring Requirements for Catalytic Reformer.** The applicable limits and monitoring requirements of Refinery MACT II (40 CFR Part 63, Subpart UUU) for the catalytic reformer (S1425) are not included in the draft Title V Permit. Remove S1425 from Table VII - AE and create a new table, VII - AEa. Copy all provisions from Table IV-AE to IV-AEa and add the following rows:

**Table VII – Aea
Applicable Limits and Compliance Monitoring Requirements
S1425 – DH CATALYTIC REFORMER UNIT (CRU),**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
HCl	MACT Subpart UUU 63.1567(a)(1)	Y	4/11/05	Reduce HCl emissions by 97% (wt) or HCl emissions of 10 ppmv at 3%O ₂	MACT Subpart UUU 63.1567(b) 63.1567(c) 63.1570(c) 63.1571(b) 63.1572(c) 63.1572(d) 63.1574(a)(2) 63.1574(a)(3) (i) 63.1574(a)(3) (ii) 63.1574(d) 63.1575(a) 63.1575(b) 63.1575(c) 63.1575(d) 63.1575(f)(1) 63.1576(a) 63.1576(b) 63.1576(d) 63.1576(f) 63.1576(g) 63.1576(h)	P/E (Initial compliance demonstration, performance test, CPM installation and performance evaluation, establish operating limits, submit initial notifications and NOCS), P/Semi-Annual (compliance report), and C (parameter monitoring, maintain records)	Continuous pH and water/gas flow monitors, Performance test, Records, and reports

3. **Refinery MACT II Applicable Limits and Monitoring Requirements for Sulfur Plants.** The applicable limits and monitoring requirements of Refinery MACT II (40 CFR Part 63, Subpart UUU) for the catalytic cracker (S-1426) are not included in the draft Title V Permit. SRU 1 and 2 have different requirements from SRU 3 and 4, as the latter sources have completed initial performance testing. Delete SRU3 and SRU4 from Table VII – AI and add the following rows:

Table VII – AI
Applicable Limits and Compliance Monitoring Requirements
S1431 –CP SULFUR PLANT 1 (SRU1), S1432 – CP SULFUR PLANT 2 (SRU2)

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO ₂	MACT Subpart UUU 63.1568(a)(1)(i)	Y	4/11/05	SO ₂ emissions shall not exceed 250 ppmv at 0% excess O ₂	MACT Subpart UUU 63.1568(b)(1) 63.1568(b)(2) 63.1568(b)(5) 63.1568(c)(1) 63.1570(c) 63.1571(b) 63.1572(a) 63.1572(d) 63.1574(a)(2) 63.1574(a)(3) 63.1574(d) 63.1574(f)(1) 63.1575(a) 63.1575(b) 63.1575(c) 63.1575(e) 63.1575(f)(1) 63.1576(a) 63.1576(b) 63.1576(d) 63.1576(f) 63.1576(g) 63.1576(h) 63.1576(i)	P/E (Initial compliance demonstration, performance test, CEMs installation and performance evaluation, submit initial notifications and NOCS), P/D (records) P/Semi-Annual (compliance report) and C (emissions monitoring, maintain records)	Records, SO ₂ and O ₂ CEM, Performance Test, Reports

Create a new Table VII – AIa, with the same information as Table VII – AI and add the following rows:

Table VII – AIa
Applicable Limits and Compliance Monitoring Requirements
S1765 – OPCEN SULFUR PLANT 3(SRU3), S4180 – OPCEN SULFUR PLANT 4 (SRU4)

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO ₂	MACT Subpart UUU 63.1568(a)(1)	Y	4/11/05	250 ppmv SO ₂ at 0% excess O ₂	MACT Subpart UUU 63.1568(b)(1) 63.1568(b)(5) 63.1568(b)(7) 63.1568(c)(2) 63.1570(c) 63.1572(a)(1) 63.1572(a)(3) 63.1572(a)(4) 63.1572(d) 63.1574(a) 63.1574(d) 63.1575(a) 63.1575(b) 63.1575(c) 63.1575(e) 63.1575(g) 63.1575(h) 63.1576(a) 63.1576(b) 63.1576(d) 63.1576(e) 63.1576(f) 63.1576(g) 63.1576(h) 63.1576(i)	P/E (Initial Compliance Demonstration, Submit initial notifications and NOCS), P/D (records), P/Semi-Annual (compliance report), and C (emissions monitoring, maintain records)	Records, SO ₂ and O ₂ CEM, Reports

C. Required Modifications to Section IX

Some provisions of 40 CFR Part 63, Subpart UUU are not applicable to the various sources at the refinery. Please create the following additional tables in Section IX – Permit Shield:

Table IX A – 1a
Permit Shield for Non-applicable Requirements
S1765 – OPCEN SULFUR PLANT 3 (SRU3)
S4180 – OPCEN SULFUR PLANT 4 (SRU4)

Citation	Title or Description (Reason not applicable)
40 CFR 63 Subpart UUU 63.1568(b)(2) and 63.1571	Initial performance test for Subpart UUU initial compliance demonstration (Exempt because sources are subject to NSPS and have already completed initial performance tests).

Table IX A – 14
Permit Shield for Non-applicable Requirements
S1425 – DH Catalytic Reformer Unit (CRU)

Citation	Title or Description (Reason not applicable)
40 CFR 63 Subpart UUU 63.1566	Organic HAP emission limitations from Catalytic Reforming Units (exempt per 40 CFR 1562(f)(5); gaseous stream routed to fuel gas system).

Attachment G

Regulation 9, Rule 10, Nitrogen Oxides and Carbon Monoxide from Boilers, Steam Generators and Process Heaters in Petroleum Refineries

BAAQMD 9-10 was amended on July 17, 2002. The current Title V draft includes some rule sections that no longer apply. One of these rule sections has been deleted from the amended rule and some initial compliance requirements have already been completed. The following changes should be made to the draft Title V Operating Permit to update and correct BAAQMD 9-10 requirements.

Changes to Section IV of the Title V Permit:

1. In Table IV–BK, which includes the applicable requirements for the CO boilers, delete the following requirements, which have been completed and no longer apply:
 - **BAAQMD 9-10-401 Control Plan Requirements**
 - **BAAQMD 9-10-403 Clean-Fuel Extension Compliance Date**
 - **BAAQMD 9-10-501 Initial Demonstration of Compliance Schedule**
2. In Table IV-BK, delete 9-10-301.3 because this none of section 9-10-301 applies to CO boilers.
3. Delete BAAQMD 9-10-301.3 from gas-fired only combustion devices. BAAQMD 9-10-301.3 applies to test firing on non-gaseous fuels. Sources permitted only for gas-firing should not be subject to 9-10-301.3. Delete 9-10-301.3 from the following Table IVs:
 - IV-AZ
 - IV-BC
 - IV-BD
 - IV-BZ
 - IV-CS
 - IV-CU
4. In Tables IV–AY, AZ, BA, BC, BD, BG, BL, BZ, CS and CU, delete the following requirements, which have been deleted or completed and no longer apply:

- BAAQMD 9-10-302 Interim Facility-Wide NOx Emission Rate Limit
- **BAAQMD 9-10-401 Control Plan Requirements**
- **BAAQMD 9-10-403 Clean-Fuel Extension Compliance Date**
- **BAAQMD 9-10-501 Initial Demonstration of Compliance Schedule**

5. **Add BAAQMD 9-10-504.1 to Appropriate Tables.** Assuming that citations listed at a higher level imply that all subsections apply BAAQMD 9-10-504 in its entirety does not apply to all Reg 9, Rule 10 sources. BAAQMD 9-10-504.1 applies to all 9-10 units, 9-10-504.2 applies only to small units subject to 9-10-306 tune-up requirements. BAAQMD 9-10-504.1 should be added to the following Table IVs:

- IV-AY
- IV-AZ
- IV-BA
- IV-BC
- IV-BD
- IV-BG
- IV-BL
- IV-BZ
- IV-CS
- IV-CU

6. Boiler No. 5 (S1800) is currently not in operation. If this boiler were placed back into operation it would utilize CEMS to demonstrate compliance with BAAQMD 9-10. Therefore, in Table IV–BZ, add the following monitoring requirements:

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 1	General Provisions and Definitions (5/02/01)		
1-520	Continuous Emission Monitoring	Y	
1-520.8	Monitors as required by Regulation 10, 12 and Section 2-1-403	Y	
1-522	Continuous Emission Monitoring and Recordkeeping Procedures	Y	
1-522.3	CEM performance testing required.	Y	
1-522.4	Inoperation > 24 hours shall be reported. Proof of repair shall be provided for downtime > 15 days.	Y	
1-522.5	Daily monitor calibration.	Y	

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
1-522.6	CEM maintenance required and must be accurate.	Y	
1-522.7	Excess emissions to be reported within 96 hours and the report shall include the nature, extent, and cause.	N	
1-522.8	Monitoring data to be submitted on a monthly basis.	Y	
1-522.9	Records shall be maintained for two years.	Y	
1-522.10	Monitors required by Sections 1-521 or 2-1-403 shall meet the requirements specified by the APCO.	Y	
1-523	Parametric Monitoring and Recordkeeping Procedures	Y	
1-523.1	In operation > 24 hours shall be reported.	Y	
1-523.2	In operation shall not exceed 15 days per incident or 30 calendar days per 12-month period.	Y	
1-523.3	Violation of permit conditions to be reported within 96 hours, and the report shall include the nature, extent, and cause.	N	
1-523.4	Records maintained for two years.	Y	
1-523.5	Maintenance and calibration required.	N	
SIP Regulation 1	PROVISIONS NO LONGER IN CURRENT RULE General Provisions and Definitions (6/28/99)		
1-522.7	Excess emissions to be reported within 96 hours and the report shall include the nature, extent, and cause	Y	
1-523.3	Violation of permit conditions to be reported within 96 hours, and the report shall include the nature, extent, and cause	Y	

Changes to Section VII of the Title V Permit:

1. In Table VII-AU, AX, CB and CE, delete BAAQMD 9-10-302, because this section has been deleted from the rule.

2. In Table VII-BA, delete BAAQMD 9-10-301.3 because none of section 9-10-301 applies to CO boilers.

3. In Table VII-BL, modify the BAAQMD 9-10 monitoring requirements as follows, because S1800 has and will use CEMS if it becomes operational:

**Table VII – BL
Applicable Limits and Compliance Monitoring Requirements
S1800 – UTIL F-88 BOILER 5**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
NOx	BAAQMD 9-10-301	N		Refinery-wide NOx emission rate shall not exceed 0.033 lb/MMBtu, operating-day average	BAAQMD 9-10-502, 9-10-504.1, 9-10-505, 1-522 and 1-523	C	NOx and O ₂ CEM monitoring, records, and reporting
NOx	BAAQMD 9-10-303	Y		NOx emission rate shall not exceed 0.2 lb/MMBtu, operating-day average (facility-wide)	BAAQMD 9-10-502, 9-10-504.1, 9-10-505, 1-522 and 1-523	C	NOx and O ₂ CEM monitoring, records, and reporting
CO	BAAQMD 9-10-305	N		CO emissions shall not exceed 400 ppmv dry at 3% O ₂ , operating-day average	BAAQMD 9-10-502, 9-10-504.1, 9-10-505, 1-522 and 1-523	P	Monitoring, records, and reporting

4. *In Table VII-BL, delete the line that has BAAQMD 9-10-501 because this is a monitoring requirement for initial compliance. It is not a numeric limit and should not be in Section VII.*
5. *Since BAAQMD 9-10-504.2 only applies to small units, change BAAQMD 9-10-504 to 9-10-504.1 in the following tables:*
 - *VII-AP*
 - *VII-AQ*
 - *VII-AR*
 - *VII-AT*
 - *VII-AU*
 - *VII-AX*
 - *VII-BB*
 - *VII-BL*
 - *VII-CB*
 - *VII-CE*

Attachment H

Permit Condition 18265

Implementing Regulation 9-10, Nitrogen Oxides and Carbon Monoxide
from Boilers, Steam Generators and Process Heaters in Petroleum Refineries

Permit Condition 18265 was first included in the BAAQMD Permit to Operate on August 1, 2002. This condition was not included in the draft Title V Operating Permit. The following changes should be made to the draft Title V Operating Permit.

Changes to Section IV of the Title V Permit:

1. Permit Condition 18265, Parts 1, 3, 4, and 5 apply to heaters and boilers that utilize CEMS. The following heaters and boilers utilize CEMS:

S1486 – DH F-40 CU FEED
S1487 – DH F-41B VFU FEED
S1488 – DH F-41A VFU FEED
S1490 – DH F-43 GOHT FEED
S1491 – DH F-44 NHT FEED
S1492 – DH F-45 PRIMARY COLUMN REBOIL
S1493 – DH F-46 STABILIZER REBOIL
S1494 – DH F-47 SECONDARY COLUMN REBOIL
S1495 – DH F-49 CRU PREHEAT
S1496 – DH F-50 CRU
S1497 – DH F-51 CRU
S1498 – DH F-52 CRU REBOIL
S1499 – DH F-53 CRU REGEN
S1500 DH F-55 SGP HEAT MEDIUM
S1502 – DH F-57 HCU FIRST STAGE FEED
S1503 – DH F-58 HCU SECOND STAGE FEED
S1504 - DH F-59 HCU SECOND STAGE REBOIL
S1505 - DH F-60 HP1 STEAM METHANE REFORMER
S1508 – CP F-63 CFH FEED
S1510 – CP F-66 CCU PREHEAT
S1511 – CP F-67 CCU LGO REBOIL
S1514 - UTIL F-70 BOILER 4
S1515 – DH F-71 HCU FIRST STAGE REBOIL
S1761 - OPCEN F-104 HP2 STEAM METHANE REFORMER

S1762 – DH F-128 CRU INTERHEATER
 S1763 - DH F-126 CU FEED
 S4002 – DC F-13425-A DCU
 S4003 – DC F13425-B DCU
 S4031 – DC F-14012 HGHT REBOIL
 S4141 – DC F-14011 HGHT FEED, AND
 S4161 – DC H-101 HP3 STEAM METHANE REFORMER

Therefore, the following changes should be made to Tables IV-BA, BC, BD, BG, BL, and CU:

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Condition #18265			
Part 1	Continuous Emission Monitoring Requirements	Y	
Part 2	Emission Rate Limitations	Y	
Part 3	Interchangeable Emission Reduction Credit Compliance	Y	
Part 4	Summary of daily actual emissions, daily allowable emissions, actual monthly NOx emission rate.	Y	
Part 5	Summarize daily IERCs on a monthly basis	Y	
Part 6	If unit is scheduled for operation, initial source testing is required within 30 days of initial operation.	Y	
Part 7	Compliance with BAAQMD Policy: “NOx, CO, and O₂ Monitoring and Compliance with Regulation 9, Rule 10” (dated June 23, 2000 and subsequent revisions)	Y	
Part 8	operating range limits for S-1476, S-1477, S-1478, S-1479, S-1508, S-1760 and S-4021 [basis: Regulation 9-10-502]	Y	
Part 9	Maximum firing rate [basis: Regulation 2-1-234]	Y	
Part 10	Maintain fuel flow meter [basis: Regulation 9-10-503]	Y	
Part 11	Recordkeeping [basis: Regulation 9-10-503]	Y	

2. Permit Condition 18265, Parts 2, 3, 4, 5, and 9 apply to heaters and boilers that do not utilize CEMS. The following heaters and boilers do not utilize CEMS:

S1476 – LUBS F-24 ATMOSPHERIC FEED
 S1477 – LUBS F-25 VACUUM FEED
 S1478 - LUBS F-26 FURFURAL RAFF
 S1479 - LUBS F-27 FURFURAL EXTR,
 S1480 - LUBS F-69 ASPHALT CIRCULATION,
 S1481 – OPCEN F-30 DSU
 S1483 - LUBS F-32 ASPHALT CIRCULATION
 S1484 – LUBS F-34 LHT CHARGE
 S1506 - CP F-61 CGP FEED

S1760 - OPCEN F-102 FXU STEAM SUPERHEATER
S4021 – DC F-13909 DHT RECYCLE
S4171 – LUBS F-13000 LHT2 FEED

Therefore, the following changes should be made to Tables IV-AY, AZ, and CS:

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Condition #18265			
Part 1	Continuous Emission Monitoring Requirements	N	
Part 2	Emission Rate Limitations	Y	
Part 3	Interchangeable Emission Reduction Credit Compliance	Y	
Part 4	Summary of daily actual emissions, daily allowable emissions, actual monthly NOx emission rate.	Y	
Part 5	Summarize daily IERCs on a monthly basis	Y	
Part 6	If unit is scheduled for operation, initial source testing is required within 30 days of initial operation.	N	
Part 7	Compliance with BAAQMD Policy: “NOx, CO, and O₂ Monitoring and Compliance with Regulation 9, Rule 10” (dated June 23, 2000 and subsequent revisions)	N	
Part 8	operating range limits for S-1476, S-1477, S-1478, S-1479, S-1508, S-1760 and S-4021 [basis: Regulation 9-10-502]	N	
Part 9	Allowable operating ranges for S-1476, S-1477, S-1478, S-1479, S-1480, S-1481, S1483, S1484, S1506, S-1760, S-4021, and S-4171 [basis: Regulation 9-10-502]	Y	
Part 10	Maintain fuel flow meter [basis: Regulation 9-10-503]	N	
Part 11	Recordkeeping [basis: Regulation 9-10-503]	N	

3. Boiler No. 5 (S1800) is currently not in operation. As a result, it has not been tested. If it is placed back into operation, it will utilize CEMS. Therefore, the following citations should be added to Table IV-BZ.

Table IV – BZ Source-specific Applicable Requirements S1800 - UTIL F-88 BOILER 5			
Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Condition #18265			
Part 1	Continuous Emission Monitoring Requirements	Y	
Part 3	Interchangeable Emission Reduction Credit Compliance	Y	
Part 4	Summary of daily actual emissions, daily allowable emissions, actual monthly NOx emission rate.	Y	
Part 5	Summarize daily IERC's on a monthly basis	Y	

Table IV – BZ Source-specific Applicable Requirements S1800 - UTIL F-88 BOILER 5			
Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 6	If unit is scheduled for operation, initial source testing is required within 30-days of initial operation.	Y	

Changes to Section VI of the Title V Permit:

1. **There are some errors in Condition 18265 in the draft Title V Permit. Not all of the Parts should be added, because they duplicate BAAQMD rules and regulations or they are “one time” requirements that have already been met. Comments 2 through 10 (below) address changes to Permit Condition 18265 that must be incorporated into the Title V Permit.**

2. **In Permit Condition 18265, Part 1, the future effective dates have past. There is no reason to list the sources by phases. Incorporate all sources in Part 1 into one list.**

3. **In Permit Condition 18265, Part 1, add S1508 (CP F-63 CFH Feed) to the list of sources that utilize CEMS.**

4. **In Permit Condition 18265, Part 2, the future effective dates have past. There is no reason to list the sources by phases. Incorporate all sources in Part 2 into one list.**

5. **In Permit Condition 18265, Part 2, remove S1508 (CP F-63 CFH Feed) because it utilizes CEMS.**

6. **The requirements outlined in Part 7 of Permit Condition 18265 duplicate BAAQMD Regulation 9-10-502. Additionally, the District policy should not be referenced in a permit condition. Therefore, this permit condition should not be included in the Title V permit.**

7. **The requirements outlined in Part 8 of Permit Condition 18265 have been completed. Therefore, Part 8 should not be included in the Title V Permit.**

8. In Permit Condition 18265, Part 9, modify the table and text as follows:

Except during startup and shutdown, the allowable operating ranges for S1476, S1477, S1478, S1479, ~~S1508~~, S1760 and S4021 are as follows:

Source (F #)	O2 min	O2 max	Firing min	Firing max
1476 (F 24)	3.9	12.7	35.7	72.2
1477 (F 25)	4.1	14.2	10.6	26.6
1478 (F 26)	3.5	12.4	2.3	11.5
1479 (F 27)	3.7	12.0	10.3	25.7
1508 (F 63)	2.1	8.5	32.2	94.0
1760 (F 102)	1.8	4.4	54.9	90.5
4021 (F 13909)	0.7	5.6	11.9	33.7

I D No.	ID No.	Permit to Operate	EVS Emission Factor	O ₂ %		Firing Rate, MMBTU/hr (HHV)		Mo nitoring Method
				o	i	o	i	
MR	BA AQMD	Maximum FiringLimit MM Btu/hr (HHV)	NOxlb s./MMBtu (HHV)					
F -24	S- 1476	85	0.180	.9	3 2.7	5.7	2.2	EV S-Box
F -25	S- 1477	48	0.160	.1	4 4.2	0.6	6.6	EV S-Box
F -26	S- 1478	13	0.160	.5	3 2.4	.3	1.5	EV S-Box
F -27	S- 1479	30	0.160	.7	3 2.0	0.3	9.3	EV S-Box
F -102	S- 1760	139	0.180	.8	1 .4	4.9	0.5	EV S-Box
F -13909	S- 4021	49	0.029	.7	0 .6	1.9	3.7	EV S-Box

The O₂ concentrations are expressed as percent, and the firing rates are in million BTU/hr, higher heating value.

In the event that the owner/operator operates any source outside of its associated operating range above, the owner/operator shall perform a source test to determine NO_x emissions, in accordance with the monitoring policy in Condition 7 in Regulation 9-10-502. If NO_x emissions are less than or equal to the emission rate

indicated in Condition 2, the source testing results may be used to expand the allowable operating range above. If NO_x emissions exceed the emission rate indicated in Condition 2, this source is in violation for each day it operated outside of the defined operating range.

- 9. The requirements outlined in Part 10 of Permit Condition 18265 duplicate BAAQMD Regulation 9-10-502.2. Therefore, this permit condition should not be included in the Title V Permit.**

- 10. The requirements outlined in Part 11 of Permit Condition 18265 duplicate BAAQMD Regulation 9-10-504. Therefore, this permit condition should not be included in the Title V Permit.**

Changes to Section VII of the Title V Permit:

1. In Tables VII-AR, AT, AU, AX, BB, and CE, add the following permit condition citations for monitoring to demonstrate compliance with BAAQMD 9-10-301 and 9-10-303:
 - BAAQMD Permit Condition 18265, Part 1
 - BAAQMD Permit Condition 18265, Part 3
 - BAAQMD Permit Condition 18265, Part 4
 - BAAQMD Permit Condition 18265, Part 5

2. In Tables VII-AR, AT, AU, AX, BB, and CE, change the monitoring frequency for BAAQMD 9-10-305 from “C” to “P” to reflect periodic monitoring pursuant to the 9-10-502 “equivalent monitoring system”.

3. In Table VII-BL, add the following permit condition citations for monitoring to demonstrate compliance with BAAQMD 9-10-301 and 9-10-303:
 - BAAQMD Permit Condition 18265, Part 1
 - BAAQMD Permit Condition 18265, Part 3
 - BAAQMD Permit Condition 18265, Part 4
 - BAAQMD Permit Condition 18265, Part 5

4. In Table VII-BL, change the monitoring frequency for BAAQMD 9-10-305 from “C” to “P” to reflect periodic monitoring pursuant to the 9-10-502 “equivalent monitoring system” requirements.

5. In Tables VII-AP, AQ, and CB, add the following permit condition citations for monitoring to demonstrate compliance with BAAQMD 9-10-301 and 9-10-303:

- BAAQMD Permit Condition 18265, Part 2
 - BAAQMD Permit Condition 18265, Part 3
 - BAAQMD Permit Condition 18265, Part 4
 - BAAQMD Permit Condition 18265, Part 5
 - BAAQMD Permit Condition 18265, Part 9
6. Split Table VII-AQ into two tables. Make one Table VII-AQa for S1478, S1479, and S1760. These sources are subject to NOx box monitoring. Make the other Table VII-AQb for S1480, S1481, S1483, S1484, S1506. These sources are subject to annual NOx source testing. On Table VII-AQb, change the monitoring frequency for 9-10-301 and 9-10-303 from “C” to “P/A” to reflect the annual source test frequency specified in Condition 18265, Part 9.
 7. Split Table VII-CB into two tables. Make one Table VII-CBa for S4021, which is subject to NOx box monitoring. Make the other Table VII-CBb for S4171. This source is subject to annual NOx source testing. On Table VII-CBb, change the monitoring frequency for 9-10-301 and 9-10-303 from “C” to “P/A” to reflect the annual source testing frequency specified in Condition 18265, Part 9.
 8. In Tables VII-AP, AQ, and CB, change the monitoring frequency for BAAQMD 9-10-305 from “C” to “P” to reflect periodic monitoring pursuant to the 9-10-502 “equivalent monitoring system” requirements.

Delete 1-522 and 1-523 from Tables VII-AR, AT, AU, AX, BB, CE and delete 1-523 from Tables AP, AQ, and CB for the monitoring requirement citations for 9-10-305. These sources are required to perform periodic CO monitoring through the use of source tests, not CEMs.

Attachment Ia

Alternative Monitoring Plans 40 CFR 60, NSPS Subpart J – Fuel Gas Combustion Devices

NSPS Subpart J requires that H₂S in fuel gas be limited to 163 ppm if the fuel gas is combusted in an affected fuel gas combustion device. To demonstrate compliance, H₂S CEMS are required. The primary fuel gas streams at the refinery include refinery fuel gas (RFG) and flexigas (FXG). Each of these fuel gas streams have an H₂S CEMS as required by NSPS Subpart J. The definition of fuel gas under NSPS Subpart J also includes other gas streams, such as process vent streams, if they are routed to an affected fuel gas combustion device. For these vent streams, the refinery does not use CEMS and instead utilizes alternative monitoring that is allowed under 60.13(i). Attached is a December 4, 2002 letter from the U.S. Environmental Protection Agency, Region IX that authorizes the use of alternative monitoring. The following comments provide requested changes to the draft Title V Permit to incorporate the alternative monitoring requirements.

1. **Caustic Regenerator (CR-2) Oxidizer.** The CR-2 is permitted to vent to furnaces F-14001 or F-13425. F-14001 is BAAQMD S4141 and F-13425 is BAAQMD S4002 (F-13425-A) and S4003 (F-13425-B). All three sources are permitted to combust RFG, FXG, and CR-2 vent gas. The following changes should be incorporated into the draft permit to allow for alternative monitoring:
 - A. Copy Table IV-BC as a new Section IV Table and insert it after Table IV-BC. Assign a new Table IV-## number.
 - B. In the existing Table IV-BC, remove the reference to S4141.
 - C. In the new Table IV-##, delete the reference to S1494, S1502, S1503, S1505, S1515, S1761, S4031 and only keep the reference to “S4141 – DC F-14011 HGHT Feed.”
 - D. Insert the following row into the new Table IV-##:

**Table IV – ##TBD##
Source-Specific Applicable Requirements
S4141 – DC F-14011 HGHT Feed**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
60.13(i)	Alternatives to any monitoring procedures or requirements	Y	

- E. Copy Table IV-BF as a new Section IV Table and insert it after Table IV-BF. Assign a new Table IV-## number.
- F. In the existing Table IV-BF, remove the reference to S4002 and S4003.
- G. In the new Table IV-##, delete the reference to S1500, S1504, and S1763 and only keep the reference to “S4002 – DC F-13425-A DCU” and “S4003 – DC F13425-B DCU.”
- H. Insert the following row in the new Table IV-##:

Table IV – ##TBD##
Source-specific Applicable Requirements
S4002 – DC F-13425-A DCU
S4003 – DC F-13425-B DCU

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
60.13(i)	Alternatives to any monitoring procedures or requirements	Y	

- I. Copy Table VII-AU as a new Section VII Table and insert it after Table VII-AU. Assign a new Table VII-## number.
- J. Remove the reference to S4141 in the existing Table VII-AU.
- K. In the new Table VII-##, delete the reference to S1494, S1502, S1503, S1505, 1515, S1761, and S4031 and only keep the reference to “S4141 – DC F-14011 HGHT Feed”
- L. Incorporate the following changes and insert the following rows into the new Table VII-##:

Table VII – ##TBD##
Applicable Limits and Compliance Monitoring Requirements
S4141 – DC F-14011 HGHT Feed

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO ₂	NSPS Subpart J 60.104(a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm)	NSPS Subpart J 60.105(a)(4) and 60.105(e)(3) for refinery fuel gas and flexigas	C	H ₂ S analyzer

Table VII – ##TBD##
Applicable Limits and Compliance Monitoring Requirements
S4141 – DC F-14011 HGHT Feed

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO ₂	NSPS Subpart J 60.104 (a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm)	40 CFR 60.13(i) for CR-2 vent gas	P	Monitoring, records, and reporting

- M. Copy Table VII-AX as a new Section VII Table and insert it after Table VII-AX. Assign a new Table VII-## number.
- N. Remove the reference to S4002 and S4003 in the existing Table VII-AX.
- O. In the new Table VII-##, delete the reference to S1500, S1504, and S1763 and only keep the reference to “S4002 – DC F-13425-A DCU” and “S4003 – DC F13425-B DCU.”
- P. Incorporate the following changes and insert the following rows into the new Table VII-##:

Table VII – ##TBD##
Applicable Limits and Compliance Monitoring Requirements
S4002 – DC F-13425-A DCU
S4003 – DC F-13425-B DCU

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO ₂	NSPS Subpart J 60.104(a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm)	NSPS Subpart J 60.105(a)(4) and 60.105(e)(3) for refinery fuel gas and flexigas	C	H ₂ S analyzer
SO ₂	NSPS Subpart J 60.104 (a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm)	40 CFR 60.13(i) for CR-2 vent gas	P	Monitoring, records, and reporting

2. Lubricants Hydrotreater #1 Vacuum Flash Dryer and Sulfonation Unit SO₂ Adsorber. The Lubricants Hydrotreater #1 Vacuum Flash Dryer is permitted to vent to furnace F-34 (BAAQMD S1484). S1484 is permitted to combust RFG and Lubricants Hydrotreater #1 Vacuum Flash Dryer vent gas. The Sulfonation Unit SO₂ Adsorber is permitted to vent to furnace F-69 (BAAQMD S1480). S1480 is permitted to burn both RFG and the Sulfonation Unit SO₂ Adsorber vent gas. Both S1484 and S1480 appear in Tables IV-AY and VII-AQ. Therefore, they are combined together in this Title V modification. The following changes

should be incorporated into the draft Title V Permit to allow for alternative monitoring:

- A. Copy Table IV-AY as a new Section IV Table and insert it after Table IV-AY. Assign a new Table IV-## number.
- B. In the existing Table IV-AY, remove the reference to S1480 and S1484.
- C. In the new Table IV-##, delete the references to S1478, S1479, S1481, S1483, S1506, and S1760, and only keep the reference to “S1480 - LUBS F-69 Asphalt Circulation” and “S1484 – LUBS F-34 LHT Charge.”
- D. Insert the following row in the new Table IV-##:

**Table IV – ##TBD##
Source-specific Applicable Requirements
S1480 – LUBS F-69 ASPHALT CIRCULATION
S1484 – LUBS F-34 LHT CHARGE**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
60.13(i)	Alternatives to any monitoring procedures or requirements	Y	

- E. Copy Table VII-AQ as a new Section VII Table and insert after Table VII-AQ. Assign a new Table VII-## number.
- F. In the existing Table VII-AQ, remove the reference to S1480 and S1484.
- G. In the new Table VII-##, replace the references to S1478, S1479, S1481, S1483, S1506 and S1760, and only keep reference to “S1480 - LUBS F-69 Asphalt Circulation” and “S1484 – LUBS F-34 LHT Charge.”
- H. Incorporate the following changes and insert the following rows into the new Table VII-##:

**Table VII – ##TBD##
Applicable Limits and Compliance Monitoring Requirements
S1480 – LUBS F-69 ASPHALT CIRCULATION
S1484 – LUBS F-34 LHT CHARGE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO ₂	NSPS Subpart J 60.104(a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm)	NSPS Subpart J 60.105(a)(4) and 60.105(e)(3) for refinery fuel gas	C	H ₂ S analyzer
SO ₂	NSPS Subpart J 60.104 (a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm)	40 CFR 60.13(i) for Sulfonation Unit SO ₂ Adsorber vent gas for S1480 and Lubricants Hydrotreater #1 Vacuum Flash Dryer vent gas for S1484	P	Monitoring, records, and reporting

3. Lubricants Hydrotreater #2 Vacuum Flash Dryer. The Lubricants Hydrotreater #2 Vacuum Flash Dryer is permitted to vent to furnace F-13000 (BAAQMD S4171). S4171 is permitted to combust FXG and Lubricants

Hydrotreater #2 Vacuum Flash Dryer vent gas. The following changes should be incorporated into the draft Title V Permit to allow for alternative monitoring:

- A. Copy Table IV-CS as a new Section IV Table and insert it after Table IV-CS. Assign a new Table IV-## number.
- B. In the existing Table IV-CS, remove the reference to S4171.
- C. In the new Table IV-##, delete the reference to S4021 and only keep the reference to "S4171 – LUBS F-13000 LHT2 Feed."
- D. Insert the following row in the new Table IV-##:

**Table IV – ##TBD##
Source-specific Applicable Requirements
S4171 – LUBS F-13000 LHT2 FEED**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
60.13(i)	Alternatives to any monitoring procedures or requirements	Y	

- E. Copy Table VII-CB as a new Section VII Table and insert it after Table VII-CB. And assign a new Table VII-## number.
- F. Remove the reference to S4171 in the existing Table VII-CB.
- G. In the new Table VII-##, delete the reference to S4021 and only keep the reference to "S4171 – LUBS F-13000 LHT2 Feed."
- H. Incorporate the following changes and insert the following rows into the new Table VII-##:

**Table VII – ##TBD##
Applicable Limits and Compliance Monitoring Requirements
S4171 – LUBS F-13000 LHT2 Feed**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO ₂	NSPS Subpart J 60.104(a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm)	NSPS Subpart J 60.105(a)(4) and 60.105(e)(3) for flexigas	C	H ₂ S analyzer
SO ₂	NSPS Subpart J 60.104 (a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm)	40 CFR 60.13(i) for Lubricants Hydrotreater #2 Vacuum Flash Dryer vent gas	P	Monitoring , records, and reporting