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**EVALUATION FOR
PERMITS TO OPERATE**

APPLICANT'S NAME: INEOS POLYPROPYLENE LLC

MAILING ADDRESS: 2384 E. 223RD STREET
CARSON, CA 90810

CONTACT PERSON: ROBERT CRANMER
(310) 847 - 8555

EQUIPMENT LOCATION: 2384 E. 223RD STREET
CARSON, CA 90810

FACILITY ID: 124808

PLEASE SEE ATTACHED RECLAIM FACILITY PERMIT.

Additions are shown as underlines and deletions are shown as ~~strikeouts~~.

**SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC
CONDITIONS**

Equipment	ID No.	Conn To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: POLYPROPYLENE MANUFACTURING PLANT					P46.1,
System 2: POLYMERIZATION UNIT (INCLUDING HEAT EXCHANGERS & PUMPS)					S1.1, S15.1
COMPRESSOR, CO-13002, REACTOR CYCLE GAS COMPRESSOR, WITH AN EMEGENCY DRIVER A/N 552449 A/N 456014	D2184	C2290		VOC: RESIN (5) [RULE 1141, 11-17- 2001]	

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Equipment	ID No.	Conn To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
FILTER, FL-13004, REACTOR CYCLE GAS VENT FILTER A/N 552449 A/N 456014	D2185				
MIXER, MX-13001 A/N 552449 A/N 456014	D2186				
VESSEL, PV-13008, CATALYST FEED, HEIGHT: 8 FT; DIAMETER: 2 FT A/N 552449 A/N 456014	D2187				B59.1
TANK, PV-13009, ADDITIVE TANK, HEIGHT: 3 FT; DIAMETER: 2 FT A/N 552449 A/N 456014	D2188	C2290		VOC: RESIN (5) [RULE 1141, 11-17- 2001]	B59.1
TANK, PV-13009, ADDITIVE TANK, HEIGHT: 3 FT; DIAMETER: 2 FT A/N 552449 A/N 456014	D2189	C2290		VOC: RESIN (5) [RULE 1141, 11-17- 2001]	B59.1
VESSEL, PV-13011/13013, PRODUCT DISCHARGE SYSTEM 1A, HEIGHT: 14 FT; DIAMETER: 4 FT A/N 552449 A/N 456014	D2190				
VESSEL, PV-13012/13014, PRODUCT DISCHARGE SYSTEM 1B, HEIGHT: 14 FT; DIAMETER: 4 FT A/N 552449 A/N 456014	D2191				

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Equipment	ID No.	Conn To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
VESSEL, PV-13033/13035, PRODUCT DISCHARGE SYSTEM 2A, HEIGHT: 14 FT; DIAMETER: 4 FT A/N 552449 A/N 456014	D2192				
VESSEL, PV-13034/13036, PRODUCT DISCHARGE SYSTEM 2B, HEIGHT: 14 FT; DIAMETER: 4 FT A/N 552449 A/N 456014	D2193				
REACTOR, PV-13003, HEIGHT: 110 FT; DIAMETER: 23 FT A/N 552449 A/N 456014	D2194				C12.1 D12.3
System 6: VENT RECOVERY UNIT (Including Heat Exchangers & Pumps)					S15.1
COMPRESSOR, CO-12001, VENT RECOVERY SYSTEM A/N 552452 A/N 448820	D2239	C2290		VOC: RESIN (5) [RULE 1141, 11-17- 2001]	E193.1
FILTER, FL-13005, REACTOR CYCLE GAS VENT GUARD FILTER A/N 552452 A/N 448820	D2240				
FILTER, FL-12002, VENT RECOVERY COMPRESSOR SUCTION FILTER A/N 552452 A/N 448820	D2241				

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Equipment	ID No.	Conn To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
TANK, PV-12003, RECOVERY TANK, HEIGHT: 16 FT 3 IN; DIAMETER: 6 FT 6 IN A/N 552452 A/N 448820	D2242				
TANK, PV-12006, RECOVERY TANK, HEIGHT: 36 FT 9 IN; DIAMETER: 14 FT A/N 552452 A/N 448820	D2243				
TANK, PV-12007, RECOVERY TANK, HEIGHT: 14 FT; DIAMETER: 4 FT 6 IN A/N 552452 A/N 448820	D2244				
VESSEL, PV-12004, VENT SEPARATOR, HEIGHT: 10 FT; DIAMETER: 3 FT 6 IN A/N 552452 A/N 448820	D2245				
VESSEL, PV-12004, VENT SEPARATOR, HEIGHT: 10 FT; DIAMETER: 3 FT 6 IN A/N 552452 A/N 448820	D2245				
VESSEL, PV-12005, VENT SEPARATOR, HEIGHT: 10 FT; DIAMETER: 4 FT A/N 552452 A/N 448820	D2246				

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Equipment	ID No.	Conn To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
VESSEL, PV-13015, VENT SEPARATOR, HEIGHT: 18 FT; DIAMETER: 4 FT A/N 552452 A/N 448820	D2247	C2290		VOC: RESIN (5) [RULE 1141,11-17-2001]	
VESSEL, PV-12012, RECOVERY DRUM, HEIGHT: 12 FT; DIAMETER: 4 FT 6 IN A/N 552452 A/N 448820	D2248				
HEAT EXCHANGER, EX-12010, VENT RECOVERY REFRIGERATION INTERCHANGER A/N 552452 A/N 448820	D2442	C2290		VOC: RESIN (5) [RULE 1141,11-17-2001]	
System 9: AIR POLLUTION CONTROL (APC) SERVING RESIN					Condition S15.1
DEGASSING UNIT					
OXIDIZER, THERMAL, TO-41416, WITH 110 FEET STACK HEIGHT, 13 MMBTU PER HOUR . A/N 555329 A/N 456013	C2290	D2173 D2174 D2178 D2184 D2188 D2189 D2239 D2247 C2289 D2424 D2442 D2443	NOX: LARGE SOURCE	CO: 2000 PPMV (5) RULE 407; NOX: 40 PPMV NATURAL GAS PM: (9) RULE 404 PM: 0.1 GRAINS/ SCF (5) RULE 409	A63.9 A72.1 B59.2 C1.1 C8.1 D12.4 D28.1 <u>E193.xx</u>

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Equipment	ID No.	Conn To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
BLOWER, BL-41435, THERMAL OXIDIZER COMBUSTION AIR BLOWER A, 5800 CU. FT. PER MINUTE. A/N 555329 A/N 456013	D2436				
BLOWER, BL-41436, THERMAL OXIDIZER COMBUSTION AIR BLOWER B, 5800 CU. FT. PER MINUTE. A/N 555329 A/N 456013	D2437				
VESSEL, PV-41433, THERMAL OXIDIZER SEAL POT, HEIGHT: 8 FT. DIAMETER: 4 FT. 6 IN. A/N 555329 A/N 456013	D2438				
VESSEL, PV-41472, LOW TEMPERATURE FLARE SURGE DRUM, LENGTH: 20 FT. DIAMETER: 10 FT. A/N 555329 A/N 456013	D2466				
PUMP, LOW TEMPERATURE FLARE DRUM PUMP OUT PUMP PU-41473, WITH DOUBLE MECHANICAL SEALS A/N 555329 A/N 456013	D2467				
VESSEL, PV-41437, LOW TEMPERATURE FLARE HEADER K. O. DRUM HEIGHT: 12 FT. DIAMETER: 8 FT. A/N 555329 A/N 456013	D2439				

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VESSEL, PV-41441 THERMAL OXIDIZER FEED K. O. DRUM HEIGHT: 6 FT. DIAMETER: 4 FT. 6 IN. A/N 555329 A/N 456013	D2440				

PROCESS CONDITION NO. P46.1

The following conditions shall apply to VOC service fugitive components from this process:

All components are subject to 40CFR60, Subpart DDD.

All new valves greater than 2-inch size and major components in VOC service as defined by Rule 1173, except those specifically exempted by Rule 1173, shall be distinctly identified from other components through their tag numbers (e. g. numbers ending in the letter "N") and shall be noted in the records.

All valves in VOC service as defined in Rule 1173, except those specifically exempted by Rule 1173, shall be bellow-sealed valves for 2-inch and smaller sizes, except in the following applications: heavy liquid service, control valve, instrument piping/tubing, applications requiring torsional valve stem motion, application where valve failure could pose safety hazard (e. g. drain valves with valve stems in horizontal position), and retrofits with space limitations.

All components are subject to District Rule 1173 and 40CFR60 Subpart GGG.

All new components in VOC service greater than 500 ppm but less than 1000 ppm, as methane, measured above background using EPA Method 21, shall be repaired within 14 days of detection. A leak greater than 1,000 ppm shall be repaired according to Rule 1173.

All new pressure relief valves shall be connected to closed vent system or equipped with rupture disc.

All new sampling connections shall be closed-purge, closed-loop, or closed-vent system.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Off set, 5-10-1996]

[Processes subject to this condition: 1]

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SYSTEM CONDITIONS

S1.1 The operator shall limit the production rate to no more than 24955 metric ton(s) in any one month.

For the purpose of this condition, production rate shall be defined as polypropylene pellet production rate.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with this condition.

[RULE 1303(b)(2) -Offset, 5-10-1996; RULE 1303(b)(2)-Off set, 12-6-2002]

[Systems subject to this condition: Process 1, System 2]

S15.1 The vent gases from all affected devices of this process/system shall be vented as follows:

All emergency, startup, shutdown, process upset and calibration of the thermal oxidizer's temperature measuring and recording system vent gases shall be directed to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Off set, 5-10-1996]

[Systems subject to this condition: Process 1, System 1, 2, 3, 5, 6 and 9]

DEVICE CONDITIONS:

A63.9 The operator shall limit emissions from this equipment as follows:

<u>Contaminant</u>	<u>Emission Limit</u>
CO	Less than or equal to 422 LBS IN ANY 30-DAY PERIOD
PM10	Less than or equal to 255 LBS IN ANY 30-DAY PERIOD
ROG	Less than or equal to 1483 LBS IN ANY 30-DAY PERIOD

The operator shall calculate the emission limit(s) of VOC for compliance determination purposes as follows; VOC emissions equation: Sum of (total process

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vent flow x VOC emissions factor for each case x fraction of time in each operating mode) = lbs of VOC to thermal Oxidizer. Lbs of VOC x 0.01 (Destruction Factor) OC emissions. The emission factors are as follows: Normal F1 = 0.0323; Reactor Transition F2= 0.0434; C3 Regen F3= 0.0264. The total process vent flow shall be determined based on the parameters measured under condition D12.4.

The operator shall calculate the emission limit(s) of CO for compliance determination purposes as follows; The CO emissions equation: $[(\text{Natural gas flow rate lbs/hr}) \times (3.529) + \text{Sum of } (\text{Total process vent flow rate lbs/hr}) \times (\text{emission factor for each case}) \times (\text{fraction of time in each operating mode})] \times 0.00011 = \text{CO emissions in lbs/hr}$. The emission factors are as follows: Normal F1 = 0.327; Reactor Transition F2= 0.455; C3 dryer Regeneration F3= 0.305. The total process vent flow shall be determined based on the parameters measured under condition D12.4.

The operator shall calculate the emission limit(s) of PM10 emissions for compliance determination purposes as follows; PM10 emissions equation: $\text{Selective Catalytic Agent Flow Rate in lbs/hr} \times 0.1665 = \text{PM10 emissions in lbs/hr}$. The Selective Catalytic Agent Flow Rate shall be determined based on the parameters measured under condition D12.3.

Where F1 Normal Venting is defined as normal venting, i.e. no transition between polymer type formed in reactor and no regeneration of the feed purification dryers. F2 Transition Venting is defined as venting during transition between types of polymer formed in the reactor. F3 Dryer Regeneration Venting is defined as venting during the regeneration of the feed treating unit dryers.

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : C2290]

A72.1 The operator shall maintain this equipment to achieve a minimum destruction efficiency of 99 percent for ROG during the normal operation of the equipment it vents.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition: C2290]

B59.1 The operator shall only use the following material(s) in this device:

Originally permitted Catalyst/Additive or the Research Catalyst/Additive evaluated in the Rule 441 Research Project under A/Ns 419457 and 419458.

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[RULE 1303(b)(2)-Offset, 5-10-1996, RULE 1401, 3-4-2005]

[Devices subject to this condition: d2187, 2188, 2189]

B59.2 The operator shall only use the following material(s) in this device:
Process Vent Gas with a gross heating value of less than 300 Btu/scf.

[RULE 2011, 12-5-2003; RULE 2011, 1-7-2005]

[Devices subject to this condition: C2290]

C1.1 The operator shall limit the material processed to no more than 148285 lb(s) in any one month.

For the purpose of this condition, material processed shall be defined as the hydrocarbon flow rate from the process vent line to the thermal oxidizer, calculated using a District algorithm based on the parameters

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition: C2290]

C8.1 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, is not less than 1400 Deg F.

The operator shall install and maintain a(n) temperature reading device to accurately indicate the temperature in the combustion chamber. The operator shall also install and maintain a device to continuously record the parameter being measured.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : C2290]

C12.1 The operator shall use this equipment in such a manner that the amount of propylene recovered from the reactor during plant shutdown and sent back to ~~BP~~ the contiguous Carson Refinery being monitored as indicated below is greater than or equal to 67,897 pounds.

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The operator shall install and maintain a flowmeter to accurately indicate the:

1. amount of propylene recovered from the reactor during plant shutdown and sent back to BP the contiguous Carson Refinery. In addition, the operator shall keep records in a manner approved by the District, for this parameter.

The maximum amount of propylene shall be recovered from the reactor at a minimum pressure of 250 psig during shutdown prior to venting to BP the contiguous Carson Refinery Flare No. 5

The operator shall calculate the propylene recovered for compliance determination purposes as follows:

$$\text{Recovered Propylene} = 104,457 - (22,343 \text{ Cubic feet} \times \text{Reactor vapor density} \times \text{Weight proportion of propylene in reactor})$$

The contiguous Carson Refinery is the adjacent refinery owned by Tesoro or subsequent owner.

RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : D2194]

D12.3 The operator shall install and maintain a(n) flow meter to accurately indicate the flow rate of the Selective Catalytic Agent going to the reactor.

The operator shall also install and maintain a device to continuously record the parameter being measured.

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : D2194]

D12.4 The operator shall install and maintain a(n) continuous monitoring system to accurately indicate the flow rate from the process vent line to the thermal oxidizer using a District approved GC analyzer and flow meter or other District approved method.

The operator shall also install and maintain a device to continuously record the parameter being measured.

[RULE 1303(b)(2)-Offset, 5-10-1996]

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[Devices subject to this condition : C2290]

D28.1 The operator shall conduct source test(s) in accordance with the following specifications:

The test shall be conducted once every three years.

The test shall be conducted when the Plastic Extrusion Unit is operating at least at 80 percent of its maximum rated capacity.

The District shall be notified of the date and time of the test at least 10 days prior to the test.

The test shall be conducted to determine the CO emissions at the outlet.

The test shall be conducted to determine the solid PM emissions at the outlet.

The test shall be conducted to determine the PM10 emissions at the outlet.

The test shall be conducted to determine the oxygen concentration at the outlet.

The test shall be conducted to determine the VOC emissions at the inlet and outlet.

The test shall be conducted to determine the flow rate at the inlet and outlet.

The test shall be conducted for the determination of the VOC control efficiency of the thermal oxidizer.

The test shall be conducted such that plant operating data including flow rate of propylene feed, prepared catalyst, and Selective Catalyst Agent and the production rate of polypropylene powder or pellets shall be recorded and included in the final test report. Source test results shall be submitted to the District no later than 60 days after the source test was conducted.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-O« set, 5-10-1996]

[Devices subject to this condition : C2290]

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and

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other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emission (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emissions and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2) Have determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4) - Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D2199, D2202, D2206, D2212, 2214, D2215, D2218, D2219, D2220, D2223, D2224, D2225, D2249, D2253, D2255, D2256, D2257, D2259, D2263, D2267, D2268, D2269, D2271, D2274, D2277, D2279, D2281, D2283, D2435]

E193.1 The operator shall operate and maintain this equipment according to the following requirements:

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The operator shall vent the distance piece of this equipment to the suction side of the vent recovery compressor during normal operation.

The operator shall vent the nitrogen purge from the crank case of this equipment to BP the contiguous Carson Refinery's Vapor Recovery System identified as System 4 of Process 21 of BP the contiguous Carson Refinery's Facility Permit during normal operation.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Off set, 5-10-1996]

[Devices subject to this condition : D2239]

E193.xx The operator shall operate and maintain this equipment according to the following requirements:

The combustion chamber temperature shall be maintained at a minimum of 1,400 degrees Fahrenheit whenever the equipment it serves is in operation.

The operator shall operate and maintain a temperature measuring and recording system to continuously measure and record the combustion chamber temperature pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such a system shall have an accuracy of within 1% of the temperature being monitored and shall be inspected and , maintained on an annual basis, and calibrated once every 18 months in accordance with the manufacturer's specifications using an applicable AQMD or EPA approved method.

For the purpose of this condition, a deviation shall be defined as when a combustion chamber temperature of less than 1,400 degrees Fahrenheit occurs during normal operation of the equipment it serves. The operator shall review the records of the combustion chamber temperature on a daily basis to determine if a deviation occurs or shall install an alarm system to alert the operator when a deviation occurs.

Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective action to maintain the combustion chamber temperature at or above 1,400 degrees Fahrenheit, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

All deviations shall be reported to the AQMD on a semi-annual basis pursuant to the

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requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit. The semi-annual monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of this permit.

The operator shall submit an application with a Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

The operator shall keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; 40CFR Part 64, 10-22-1997]

[Devices subject to this condition : C2290]

BACKGROUND:

INEOS Polypropylene, LLC with Facility ID 124808 operates a polypropylene manufacturing plant that is currently a NOx and SOx RECLAIM Cycle II facility due to the operation of a 13 MMBtu per hour thermal oxidizer. The 13 MMBtu per hour thermal oxidizer identified as device C2290 is currently classified as a large NOx source and is no longer designated as a SOx process unit.

According to the New Source Review database, INEOS Polypropylene, LLC with Facility ID 124808 has a potential to emit 14 lb per day of CO, 0 lb per day of NOx, 9 lb per day of PM₁₀, 89 lb per day of ROG and 0 lb per day of SOx. Facility ID 124808 is currently a Cycle II NOx and SOx RECLAIM facility and also belongs to the Title V program.

INEOS Polypropylene, LLC with Facility ID 124808 is capable of manufacturing 500 million pounds per year of polypropylene pellets at its facility located at 2384 E. 223rd Street, Carson, California using a Unipol process technology licensed by Dow. The polypropylene manufacturing plant operates 24 hours per day, 7 days per week, 52 weeks per year. The

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polypropylene plant was constructed to recover propylene from the fuel gas of the BP Carson Refinery, which is now owned by Tesoro Refining and Marketing Company LLC. Effective June 1, 2013, BP West Coast Products LLC (Facility ID 131003) changed ownership to Tesoro Refining and Marketing Company LLC (Tesoro Los Angeles Refinery- Carson Operations, Facility ID 174287). The process involves the polymerization of polymer-grade propylene generated from the propane-propylene-splitter at the contiguous Carson refinery to produce polypropylene powder. The facility produces polypropylene pellets and packages it for distribution.

Systems 1, 2, 3, 5, 6, and 9 of the polypropylene manufacturing plant are currently connected to the no. 5 flare located at the Carson refinery and have been designed to vent to the no. 5 flare during periods of start-up, shutdown, process upsets, and emergency. All routine vent streams from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, and System No. 6 for Vent Recovery Unit of the INEOS polypropylene manufacturing plant are vented to an existing on-site thermal oxidizer. The thermal oxidizer is designed to destroy VOC created in the production of polypropylene. All of these systems are tied up into the contiguous Carson refinery no.5 flare identified as device C1661.

INEOS also submitted application no. 549890 on April 16, 2013 to comply with the requirements of 40 CFR 64, Continuous Assurance Monitoring. The CAM rule contains specific federal monitoring requirements for process equipment which is vented by air pollution control systems where the facilities are major sources, as defined in Title V (Reg 30).

A 13MBtu per hour thermal oxidizer identified as C2290 and covered under A/N 456013/G1304 is the air pollution control equipment venting VOC emissions from the operation of propylene dryers, propylene feed surge drum, reactor cycle gas compressor, additive tanks, vent recovery compressor, vent separator, product purge bin baghouse, recovered propylene dryers, vent recovery refrigeration interchanger, and intensive mixer vent ejector, filter, storage tanks, waste water separators and station sumps. Condition D 28.1 specifies a source test to be conducted on the thermal oxidizer once every three years. The last source test conducted on the thermal oxidizer on May 10, 2012 showed a VOC control efficiency of 99.989% which complies with the minimum destruction efficiency of 99% specified by permit condition A72.1.

A new permit condition shown as E193.xxx will be imposed on the thermal oxidizer to comply with the requirements of 40 CFR 64, Continuous Assurance Monitoring, (CAM). The temperature measuring and recording system of the thermal oxidizer C2290 shall be inspected and maintained on an annual basis and calibrated once every 18 months for compliance assurance monitoring purposes. Since the thermal oxidizer will be shutdown for the

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calibration, the vent gas during the calibration process shall also be directed to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from the system instead of venting the gas directly to the atmosphere.

Carson Refinery no. 5 flare identified as device C1661 is used by both Tesoro and INEOS for venting certain gas streams. The INEOS polypropylene manufacturing plant is unique in that it is a plastics manufacturing facility located within another type of facility, a petroleum refining facility owned and operated by the contiguous Carson Refinery. INEOS does not own, operate or control the no. 5 flare. Tesoro uses the flare for its operations, but also provides the flare as a service to INEOS, which utilizes the flare as an integral part of its polypropylene production operations.

However existing permit condition S15.1 specifies only that all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit of the INEOS polypropylene plant shall be directed to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system. Therefore, system condition S15.1 needs to be modified to include the vent gas during the calibration of the temperature measuring and recording system of the thermal oxidizer to the same blowdown flare. Application no. -555329 was submitted by INEOS on August 16, 2013 for administrative change of system condition S15.1 to include the vent gas during the calibration of the temperature measuring and recording system of the thermal oxidizer to the same blowdown flare.

INEOS Polypropylene, LLC with Facility ID 124808 currently reports more than 10 tons per year of VOC specified by Table 2 of Rule 3001. This is an existing facility applying for a Title V permit renewal. Initial Title V Facility Permit was issued on September 12, 2008 under A/N 391243 with subsequent revisions. Application no. 543840 was submitted on October 10, 2012 for a Title V permit renewal.

INEOS Polypropylene LLC submitted application nos. 552449 and 552452 on June 7, 2013 to replace the references of BP West Coast Products in conditions C12.1 and E193.1. INEOS is proposing to replace "BP Carson Refinery" with "the contiguous Carson Refinery". Condition C12.1 is associated with the reactor identified as device D2194 of System No. 2 for the Polymerization Unit. Condition E193.1 is associated with the Vent Recovery Compressor identified as device D2239 of System No. 6 for the Vent Recovery Unit.

INEOS also submitted application no. 552447 Polypropylene LLC submitted application no. 552447 on June 7, 2013 for RECLAIM/Title V permit revision due to the replacement of the references of BP West Coast Products in conditions C12.1 and E193.1 with the contiguous Carson refinery and also due to the change in system condition S15.1 to direct the vent gas

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during the calibration of the temperature measuring and recording system of the thermal oxidizer to the contiguous Carson refinery no.5 flare identified as device C1661 operated by its neighbor. This Title V permit revision qualifies as a minor permit revision since it does not result in an emission increase of a pollutant subject to New Source Review or a hazardous air pollutant.

TABLE 1: Summary of Applications Submitted and Fees

The table below summarizes the permit processing fee for each of the applications submitted on October 10, 2012 and June 7, 2013 for each of the polypropylene manufacturing systems:

Application No.	Application Type	Application Date	Fee Submitted	Required Permit Processing Fee
543640	Title V Renewal	10/10/2012	\$2,031.86	\$2,031.86
549890	Continuous Assurance Monitoring (CAM) Plan	4/16/2013	\$535.75	\$535.75
552447	Minor Title V/RECLAIM Facility Permit Revision	6/07/2013	\$894.55	\$1,789.12
552449	Administrative Change of Condition to Reactor D2194 of Polymerization Unit	6/07/2013	\$710.82	\$710.82
552452	Administrative Change of Condition to Vent Recovery Compressor D2239 of Vent Recovery Unit	6/07/2013	\$710.82	\$710.82
555329	Administrative Change of System Condition S15.1 to Thermal Oxidizer C2290 of APC Serving Resin Degassing Unit	8/16/2013	\$725.03	\$725.03
Total			\$5,608.83	\$6,503.40

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PROCESS DESCRIPTION:

Existing permit condition S15.1 specifies that all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit of the INEOS polypropylene plant shall be directed to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system.

A new permit condition shown as E193.xxx to be imposed on the thermal oxidizer to comply with the requirements of 40 CFR 64, Continuous Assurance Monitoring, (CAM) specifies that the temperature measuring and recording system of the thermal oxidizer C2290 shall be inspected and maintained on an annual basis and calibrated once every 18 months for compliance assurance monitoring purposes. Since the thermal oxidizer will be shutdown for the calibration, the vent gas during the calibration process shall also be directed to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from the system instead of venting the gas directly to the atmosphere.

System condition S15.1 will be revised to direct the calibration vent gas during the calibration of the temperature measuring and recording device of the thermal oxidizer C2290 to a blowdown flare system. INEOS currently vents all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit of the INEOS polypropylene plant to the contiguous Carson Refinery flare no. 5 and not to the flare gas recovery system (FGR) as required by Rule 1118 because District Rule 1118 does not apply to flares used for polypropylene production. System condition S15.1 will be revised to direct the calibration vent gas of the thermal oxidizer's temperature measuring and recording system to the same blowdown flare system.

EMISSION CALCULATIONS:

1. Application no. 552449 – Polymerization Unit

Reactor cycle gas compressor D2184, additive tank D2188, and additive tank D2189 are vented to the thermal oxidizer C2290

Operating schedule: 24 hours per day, 7 days per week, 52 weeks per year

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Uncontrolled ROG emissions from the operation of the polymerization unit based on previous application, A/N 456014 = 4.83 lb per hour = 115.02 lb per day

Controlled ROG emissions from the operation of the polymerization unit based on previous application, A/N 456014 = 1.61 lb per hour = 38.64 lb per day = 14,103.6 lb per year

Uncontrolled ROG emissions from the operation of the polymerization unit after change of condition C12.1 to replace BP Carson Refinery after change of ownership to Tesoro = 4.83 lb per hour = 115.02 lb per day

Controlled ROG emissions from the operation of the polymerization unit after change of condition C12.1 to replace BP Carson Refinery after change of ownership to Tesoro = 1.61 lb per hour = 38.64 lb per day = 14,103.6 lb per year

2. Application no. 552452 – Vent Recovery Unit

Operating schedule: 24 hours per day, 7 days per week, 52 weeks per year

Vent recovery compressor D2239, vessel vent separator D2247 and heat exchanger vent recovery refrigeration interchanger D2442 are vented to thermal oxidizer C2290

Operating schedule: 24 hours per day, 7 days per week, 52 weeks per year

Revised system condition S15.1 directs also the calibration of the thermal oxidizer's temperature measuring and recording system vent gas in addition to the existing emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system will not cause an increase in emissions of criteria air contaminants. All six systems are currently connected to the no. 5 flare located at the neighbor's Carson refinery and have been designed to vent to the no. 5 flare during periods of start-up, shutdown, process upsets, and emergency. Normal vents all routed to the existing thermal oxidizer. There are no new BACT requirements that apply to this project.

Uncontrolled ROG emissions from the operation of the vent recovery unit based on previous application, A/N 448820 = 42.4 lb per hour = 1017.6 lb per day

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Controlled ROG emissions from the operation of the vent recovery unit based on previous application, A/N 448820 = 0.09 lb per hour = 2.16 lb per day = 788.4 lb per year

Uncontrolled ROG emissions from the operation of the vent recovery unit after change of condition E193.1 to replace BP Carson Refinery after change of ownership to Tesoro and after change of system condition S15.1 = 42.4 lb per hour = 1017.6 lb per day

Controlled ROG emissions from the operation of the vent recovery unit after change of condition E193.1 to replace BP Carson Refinery after change of ownership to Tesoro and after change of system condition S15.1 = 0.09 lb per hour = 2.16 lb per day = 788.4 lb per year

3. Application No. 555329 - System No. 9, APC Serving Resin Degassing Unit

Operating schedule: 24 hours per day, 7 days per week, 52 weeks per year

Condition A63.9 limits emissions from the operation of the 13 MMBtu per hour thermal oxidizer to the following:

CO Less than or equal to 422 lbs in any 30-day period
PM10 Less than or equal to 255 lbs in any 30-day period
ROG Less than or equal to 1483 lbs in any 30-day period

Natural gas requirement = $\frac{13,000,000 \text{ Btu}}{\text{hour}} \left(\frac{\text{cu. ft.}}{1050 \text{ Btu}} \right) = \frac{12,381 \text{ cu. ft.}}{\text{hour}}$

Emissions from operation of 13 MMBTU per hour thermal oxidizer before change of condition S15.1 = Emissions from operation of 13 MMBTU per hour thermal oxidizer after change of condition S15.1 to include vent gas from the calibration of the temperature measuring and recording device of the thermal oxidizer in addition to existing emergency, start-up, shutdown, and process upset vent gases

Emissions from the Operation of 13.0 MMBtu per Hour Thermal Oxidizer Before Change of Conditions :

$\text{NOX} = \frac{1.30 \text{ lb}}{\text{hour}} = \frac{31.20 \text{ lb}}{\text{day}} = \frac{11,388 \text{ lb}}{\text{year}} = \text{R1} = \text{R2}$

$\text{CO} = \frac{422 \text{ lb}}{30 \text{ days}} = \frac{14.07 \text{ lb}}{\text{day}} = \frac{0.59 \text{ lb}}{\text{hour}} = \frac{5146.5 \text{ lb}}{\text{year}} = \text{R1} = \text{R2}$

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$$PM_{10} = \frac{255 \text{ lb}}{30 \text{ days}} = \frac{8.50 \text{ lb}}{\text{day}} = \frac{0.35 \text{ lb}}{\text{hour}} = \frac{2446.08 \text{ lb}}{\text{year}} = R1 = R2$$

$$ROG = \frac{2.06 \text{ lb}}{\text{hour}} = \frac{49.92 \text{ lb}}{\text{day}} = \frac{18,220.8 \text{ lb}}{\text{year}} = R1 = R2$$

$$SO_x = \frac{12,381 \text{ cu. ft.} (0.83 \text{ lb})}{\text{hour}} = \frac{0.01 \text{ lb}}{\text{hour}} = \frac{0.25 \text{ lb}}{\text{day}} = \frac{90.02 \text{ lb}}{\text{year}}$$

Emissions from the Operation of 13.0 MMBtu per Hour Thermal Oxidizer After Change of Conditions :

$$NOX = \frac{1.30 \text{ lb}}{\text{hour}} = \frac{31.20 \text{ lb}}{\text{day}} = \frac{11,388 \text{ lb}}{\text{year}} = R1 = R2$$

$$CO = \frac{422 \text{ lb}}{30 \text{ days}} = \frac{14.07 \text{ lb}}{\text{day}} = \frac{0.59 \text{ lb}}{\text{hour}} = \frac{5146.5 \text{ lb}}{\text{year}} = R1 = R2$$

$$PM_{10} = \frac{255 \text{ lb}}{30 \text{ days}} = \frac{8.50 \text{ lb}}{\text{day}} = \frac{0.35 \text{ lb}}{\text{hour}} = \frac{2446.08 \text{ lb}}{\text{year}} = R1 = R2$$

$$ROG = \frac{2.06 \text{ lb}}{\text{hour}} = \frac{49.92 \text{ lb}}{\text{day}} = \frac{18,220.8 \text{ lb}}{\text{year}} = R1 = R2$$

$$SO_x = \frac{12,381 \text{ cu. ft.} (0.83 \text{ lb})}{\text{hour}} = \frac{0.01 \text{ lb}}{\text{hour}} = \frac{0.25 \text{ lb}}{\text{day}} = \frac{90.02 \text{ lb}}{\text{year}}$$

Greenhouse Gases:

$$CO_2 = \frac{13 \text{ MMBtu}}{\text{hour}} \left(\frac{116.89 \text{ lb}}{\text{MMBtu}} \right) = \frac{1519.57 \text{ lb}}{\text{hour}} = \frac{36,469.68 \text{ lb}}{\text{day}} = \frac{13,311,433.2 \text{ lb}}{\text{year}}$$

$$CH_4 = \frac{13 \text{ MMBtu}}{\text{hour}} \left(\frac{0.0020 \text{ lb}}{\text{MMBtu}} \right) = \frac{0.026 \text{ lb}}{\text{hour}} = \frac{0.624 \text{ lb}}{\text{day}} = \frac{227.762 \text{ lb}}{\text{year}}$$

$$N_2O = \frac{13 \text{ MMBtu}}{\text{hour}} \left(\frac{0.0002 \text{ lb}}{\text{MMBtu}} \right) = \frac{0.0026 \text{ lb}}{\text{hour}} = \frac{0.0624 \text{ lb}}{\text{day}} = \frac{22.776 \text{ lb}}{\text{year}}$$

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4. Application No. 552447 - RECLAIM/Title V Permit Revision

Due to the replacement of the references of BP West Coast Products in conditions C12.1 and E193.1 with the contiguous Carson refinery as a result of the change of ownership from BP West Coast Products to Tesoro Refining and Marketing Company LLC, Calciner Operations and also due to the change in system condition S15.1 to direct the vent gas during the calibration of the temperature measuring and recording system of the thermal oxidizer to the contiguous Carson refinery no.5 flare identified as device C1661 operated by its neighbor, the current Title V Facility permit needs to be revised. Revision of system condition S15.1 directs not only all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit but also calibration vent gas of the thermal oxidizer's temperature measuring and recording device to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system. Revision of system condition S15.1 and changes to device conditions C12.1 and E193.1 qualifies as a minor permit revision since it does not result in an emission increase of a pollutant subject to New Source Review or a hazardous air pollutant. As a minor Title V revision, it requires only a 45-day EPA review and no public notice distribution and participation.

Operating schedule: 24 hours per day, 7 days per week, 52 weeks per year

R1 = 0 lb per hour = 0 lb per day = 0 lb per year because no emissions will be charged to A/N 552447 since A/N 552447 is for RECLAIM/ Title V Permit revision.

R2 = 0 lb per hour = 0 lb per day = 0 lb per year because no emissions will be charged to A/N 552447 since A/N 552447 is for RECLAIM/Title V Permit revision.

EVALUATION OF COMPLIANCE WITH MAJOR RULES AND ISSUES:

Replacement of the references of "BP Carson Refinery" with "the contiguous Carson Refinery" in conditions C12.1 and E193.1 due to change of ownership from BP Carson Refinery to Tesoro in the Title V facility permit and the change in system condition S15.1 to direct the vent gas during the calibration of the temperature measuring and recording system of the thermal oxidizer to the contiguous Carson refinery no.5 flare identified as device C1661 operated by its neighbor is expected to comply with all applicable District rules and regulations. Specific compliance with the following rules is anticipated:

Rule 212: INEOS directs all emergency, startup, shutdown, and process upset and calibration of the thermal oxidizer's temperature measuring and recording device vent gases from System No. 1 for Feed Treating Unit, System No. 2 for

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the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit to Carson refinery flare no. 5 to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system. Operation of the equipment does not happen within 1000 ft. of any school and does not increase emissions of criteria and toxic air contaminants. Operation of the equipment does not result in an exposure to a maximum individual cancer risk greater than or equal to one-per-million. Hence, public notice is not required.

Rule 401: System condition S15.1 directs not only all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit but also calibration vent gas of the thermal oxidizer's temperature measuring and recording device to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system. Operation of the equipment is expected to comply with visible emission limits when the six systems are operating properly and in compliance with permit conditions.

Rule 402: System condition S15.1 directs not only all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit but also calibration vent gas of the thermal oxidizer's temperature measuring and recording device to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system. Operation of the equipment is not likely to create a public nuisance with the proper operation of the specified systems and compliance with permit conditions.

Regulation IX: System condition S15.1 directs not only all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit but also calibration vent gas of the thermal oxidizer's temperature measuring and recording device to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system. Operation of the equipment will not trigger any new NSPS requirements with its proper

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operation and compliance with permit conditions. INEOS will continue to comply with applicable requirements of 40CFR 60 Subpart DDD for Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry and 40 CFR 60 Subpart GGG for Standards of Performance for Equipment Leaks in Petroleum Refineries for Construction, Reconstruction, or Modification Commenced after January 4, 1983, and on or before November 7, 2006 for all VOC service fugitive components.

Regulation X: System condition S15.1 directs not only all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit but also calibration vent gas of the thermal oxidizer's temperature measuring and recording device to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system. Operation of the equipment will not trigger any new NESHAP or MACT requirements. INEOS will continue to comply with applicable requirements under NESHAP (40 CFR Part 61) and NESHAP for Source Categories (40 CFR Part 63).

Rule 1118: Rule 1118(c)(4) allows the combustion of emergency, startup and shutdown vent gases from the INEOS polypropylene plant in the contiguous Carson Refinery Flare No. 5, which is in full use and has a valid permit to receive vent gases from this system.

Rule 1141: This rule requires that a resin manufacturer shall not manufacture organic resin unless the total emissions of VOC emissions from the organic resin reactor, thinning tank and blending tank vents, are reduced to 0.5 pound per 1000 pounds of completed resin produced or reduced by 95% percent or more before being vented to the atmosphere. The 13 MMBtu per hour thermal oxidizer was verified by a source test to have an overall control efficiency of over 99% for VOC emissions which exceeds the required control efficiency of 95% specified by Rule 1141. Emission limits based on resin were added to devices connected to the 13 MMBtu per hour thermal oxidizer in accordance with Rule 1141.

Rule 1173: Rule 1173 applies to control of volatile organic compound leaks from valves, fittings, pumps, compressors, pressure relief devices, diaphragms, hatches, sightglasses, etc.. INEOS will comply with the applicable requirements of Rule 1173 regarding leak control, identification, operator inspection, maintenance, and recordkeeping requirements for valves, pumps, compressors, pressure

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relief valves and other components where fugitive emissions occur as part of this operation.

Regulation XIII: System condition S15.1 directs not only all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit but also calibration vent gas of the thermal oxidizer's temperature measuring and recording device to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system. Revised condition S15.1 will not have a significant effect on the emissions from the facility. Therefore, no offsets are required.

Rule 1401: System condition S15.1 directs not only all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit but also calibration vent gas of the thermal oxidizer's temperature measuring and recording device to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system. Revised condition S15.1 will not increase emissions of toxic air contaminants. Health risks from this project will remain the same before and after change of system condition S15.1.

Rule 1402: There will be no increase in toxic air contaminants from existing sources as a result of this revision in system condition S15.1. System condition S15.1 directs not only all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit but also calibration vent gas of the thermal oxidizer's temperature measuring and recording device to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system.

Regulation XVII: Revision of system condition S15.1 to direct not only all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6

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for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit but also calibration vent gas of the thermal oxidizer's temperature measuring and recording device to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system will not trigger Prevention of Significant Deterioration (PSD) review.

Regulation XX: RECLAIM only applies to NOx and SOx emission sources. This proposed revision of system condition S15.1 to direct not only all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit but also calibration vent gas of the thermal oxidizer's temperature measuring and recording device to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system will have no impact on existing permitted NOx or SOx sources. The 13 MMBtu per hour thermal oxidizer identified as device C2290 is currently classified as a large NOx source.

Regulation XXX: INEOS Polypropylene LLC with Facility ID 124808 submitted on September 18, 2001 application no. 391243 for an initial Title V Facility Permit and the initial Title V Facility Permit was issued on September 12, 2008. Revision of system condition S15.1 directs not only all emergency, startup, shutdown, and process upset vent gases from System No. 1 for Feed Treating Unit, System No. 2 for the Polymerization Unit, System No. 3 for Resin Degassing Unit, System No. 5 for Plastic Extrusion Unit, System No. 6 for Vent Recovery Unit, and System No. 9 for the Thermal Oxidizer Serving Resin Degassing Unit but also calibration vent gas of the thermal oxidizer's temperature measuring and recording device to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system. Revision of system condition S15.1 and changes to device conditions C12.1 and E193.1 qualifies as a minor permit revision since it does not result in an emission increase of a pollutant subject to New Source Review or a hazardous air pollutant. As a minor Title V revision, it requires only a 45-day EPA review and no public notice distribution and participation.

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	PROCESSED BY BCW	CHECKED BY

CONCLUSIONS / RECOMMENDATIONS:

I recommend conditional permits to operate for System No. 2 for the Polymerization Unit, System No. 6 for Vent Recovery Unit and System No. 9 for Air Pollution Control (APC) Serving Resin Degassing Unit to direct all emergency, startup, shutdown, and process upset and calibration vent gases of the thermal oxidizer temperature measuring and recording system to a blowdown flare system, which is in full use and has a valid permit to receive vent gases from this system to INEOS Polypropylene LLC with Facility ID 124808.