

South Coast Air Quality Management District

Statement of Basis

Proposed Renewal of Title V Permit

Issue Date: September 18, 2013

Facility Name:	INEOS Polypropylene Line LLC
Facility ID:	124808
SIC Code:	2821
Equipment Location:	2384 East 223rd Street Carson, CA 90810
Application #(s):	543640
Application Submittal Date(s):	10/10/2012
Permit Revision #:	9
Revision Date:	DRAFT
Permit Section(s) Affected:	All
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1. Introduction and Scope of Permit

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

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of

the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. CO, NO₂ and SO₂, are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment. The status for lead is non-attainment

A Title V permit is proposed to be issued to cover the operations of INEOS Polypropylene LLC located at 2384 East 223rd Street, Carson, California. This facility is subject to Title V requirements because it is a major source and is subject to certain NSPS (New Source Performance Standards) requirements.

2. Facility Description

This is an existing facility that is applying for a Title V permit renewal. INEOS Polypropylene LLC operates a polypropylene manufacturing plant in Carson, CA. It recovers propylene from the fuel gas of the contiguous Carson Refinery. The contiguous Carson Refinery is the adjacent refinery owned by Tesoro. The process involves the polymerization of polymer-grade propylene generated at the contiguous Carson refinery to produce polypropylene powder. The polypropylene powder is mixed with various additives and extruded to produce polypropylene pellets. The facility produces polypropylene and packages it for distribution. This facility operates several dryers, screens, a reactor, a scrubber, compressors, an extruder, hoppers, and several storage silos. Several baghouses are used to control emissions of particulate matter from the operation of the pellet blending storage silos and a thermal oxidizer is used to control emissions from the operation of the propylene dryers, the propylene feed drum, the additive tanks, the reactor cycle gas compressor, and the vent recovery compressor.

3. Construction and Permitting History

Construction of the polypropylene manufacturing plant located at 2384 223rd Street, Carson, California began in September, 1997 and was completed in December, 1999. The facility has been in constant operation since December 31, 1999. The initial permits for the polypropylene plant were issued to ARCO Products Company with Facility ID 800012 on September 3, 1997. However, the facility has undergone three name changes, first to ARCO Polypropylene LLC with Facility ID 124808, second to Innovene Polypropylene LLC with Facility ID 124808 in June 2005, and the last change to INEOS Polypropylene LLC with Facility ID 124808. Numerous permits to construct and permits to operate have been issued to the facility since 1997. An initial Title V permit was issued to the facility on 9/12/08 and seven subsequent revisions were issued.

4. Regulatory Applicability Determinations

The legal requirements applicable to the operations at this facility are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal

requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. NSPS requirements of 40 CFR Part 60 apply to certain units that generate VOC emissions at the polypropylene manufacturing facility, and the permit terms and conditions may be found in Section D of the Title V permit. NESHAP requirements of 40 CFR Part 63 does not apply to any operating device at the facility.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 applies to the afterburner which controls VOC emissions from the operation of the propylene dryers, the propylene feed drum, the additive tanks, the reactor cycle gas compressor, and the vent recovery compressor of the polypropylene manufacturing plant. The facility is also subject to 40 CFR 60 Subpart DDD.

6. Permit Features

Permit Shield

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

Streamlining Requirements

This facility has not applied for any streamlined conditions. Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement.

7. Summary of Emissions and Health Risks

**Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2012**

Pollutant	Emissions (tons/year)
NOx	2.776
CO	1.808
VOC	12.666

PM	1.554
SOx	0.012

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2011**

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	764.309
Benzene	0.259
1,3-Butadiene	0.015
Formaldehyde	0.646
Lead (inorganic)	0.000
Naphthalene	0.014
Nickel	0.000
PAHs, total, with components not reported	0.006

Health Risk from Toxic Air Contaminants

The facility is determined to be exempt from the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was not necessary and a Risk Reduction Plan is not currently required under Rule 1402.

8. Compliance History

As noted, the facility has been in constant operation since 1999. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed, 1 Notice to Comply issued, and no Notices of Violation issued in the last two calendar years. One Notice to Comply was issued for minor RECLAIM reporting violation which has been closed.

9. Compliance Certification

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

10. Comments

The renewal of this Title V permit will include the removal of the condition that specifies that the source test on the three baghouses C2452, C2453 and C2454 serving the pellet packaging system shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up. Initial source testing source testing of baghouse C2452 was conducted on July 6, 2000 while source testing of baghouse C2453 was conducted on July 5, 2000 and C2454 on August 7, 2000. Therefore, this condition for initial source testing of the baghouses has been satisfied. Compliance assurance monitoring conditions will be added to the Title renewal permit for the thermal oxidizer C2290 which controls emissions from the operation of the propylene dryers, the propylene feed drum, the additive tanks, the reactor cycle gas compressor, and the vent recovery compressor of the polypropylene manufacturing plant.