



South Coast Air Quality Management District



21865 Copley Drive, Diamond Bar, CA 91765-4178
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February 10, 2010
via electronic submittal

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

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

Dear Gerardo:

Enclosed for your 45-day review is the proposed revision to the Title V facility permit for BP West Coast Products LLC (BP) located at 2350 E. 223rd Street, Carson, California. BP's initial Title V permit was issued September 1, 2009. The revision proposed under application A/N 496925 is a Significant Revision and a 30-day public notice is required.

The South Coast Air Quality Management District (AQMD) has evaluated the applications shown in table below for Permits to Operate. The AQMD has determined that the equipment will operate in compliance with all of the applicable requirements of our Rules and Regulations. The draft permit and evaluation reports are attached for your review.

Application No.	Equipment	Application for
397368	Claus Unit "A"	This application was originally submitted to remove of a sulfur pit and to add of a pressurized tank to the Claus Unit. Permit to Construct for the modification was granted on 6/12/02. The current permitting action is to issue Permit to Operate for the equipment, which also results in the removal of conditions D182.5 and E193.6. Additionally, BP requests to bypass the tail gas units allowing the Claus Unit to vent directly to the tail gas incinerators, bypassing the tail gas unit during startup, shutdown and emergency periods
397363	Claus Unit "B"	Same as above
461441	Claus Unit "C"	This application was originally submitted to install a new oxygen injection system for the Claus Unit. Permit to Construct for the modification was granted on 8/1/07. The current permitting action is to issue Permit to Operate for the equipment, which also results in the removal of conditions D182.5 and E193.6. Additionally, BP requests to bypass the tail gas units allowing the Claus Unit to vent directly to the tail gas incinerators, bypassing the tail gas unit during startup, shutdown and emergency periods
461442	Claus Unit "D"	Same as above except the current Permit to Construct does not have conditions E193.6 and D182.5.

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

Sincerely,



Jay Chen
Senior AQ Engineering Manager
Refinery and Waste Management Permitting
Engineering and Compliance

Enclosures

cc w/o enclosures:

Eric Daley, Environmental Planning Supervisor