



South Coast Air Quality Management District

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

April 8, 2015

Mr. Marshall G. Waller
Superintendent, Environmental Services
Phillips 66 Company, LA Refinery, Carson Plant
1520 E. Sepulveda Blvd
Carson, CA 90745

SUBJECT: Compliance Assurance Monitoring (CAM) Plan Approval
A/N 550868
Phillips 66 Company, LA Refinery, Carson Plant, Facility ID 171109

Dear Mr. Waller:

The South Coast Air Quality Management District has reviewed your Compliance Assurance Monitoring (CAM) Plan dated May 3, 2013 and multiple addendums. In accordance with requirements in 40CFR64, your facility submitted this plan for Executive Officer approval. This plan includes a reasonable assurance that compliance with emissions limits is continuously met by control devices used to comply with applicable emissions requirements. Monitoring is conducted using either direct monitoring of emissions, or other parameters that would indicate effective use of the control device. The following equipment is discussed in the CAM plan.

- P12S10 Selenium Plant Soil Vapor Extraction Well (D926) with associated VOC control device, Thermal Oxidizer C925
- P9S1 Air Flotation Tank 1602 (D344) with associated VOC control device, carbon adsorber C517
- P9S1 Dissolved Gas Flotation Unit V-3188 (D975) with associated VOC control devices Thermal Oxidizer C978 and Carbon Adsorber C977
- P9S1 Dissolved Gas Flotation Unit V-3189 (D976) with associated VOC control devices Thermal Oxidizer C978 and Carbon Adsorber C977
- P12S1 Tank 2520 (D432); with associated VOC control devices Thermal Oxidizer C978 and Carbon Adsorber C977

Based on the information submitted, your 40CFR64 CAM Plan has been reviewed and approved, subject to the following conditions and definitions:

GENERAL COMPLIANCE ASSURANCE MONITORING (CAM) PLAN CONDITIONS for the Following Equipment Subject to this Plan Application: Thermal Oxidizer C925, Carbon Adsorber C517, Carbon Adsorber C977, and Thermal Oxidizer C978

The operator shall operate and maintain all equipment subject to CAM requirements according to the following requirements:

1. The operator shall comply with all applicable operating and monitoring conditions and requirements referenced in Section D or H of the Title V permit.
2. All exceedances (as defined in equipment-specific definitions below) shall be reported to the AQMD pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 of 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. All prompt reporting shall be as described in Condition No. 22 in Section K of this permit.
3. The operator shall submit an application for a quality improvement plan (QIP) in accordance with 40 CFR Part 64.8 to the SCAQMD if an accumulation of exceedances for any applicable control device exceeds the number specified below.
4. The operator shall inspect and maintain all equipment components and associated monitoring equipment on an annual basis in accordance with the manufacturer's specifications.
5. The operator shall keep adequate records in a format that is acceptable to the SCAQMD to demonstrate compliance with all applicable requirements specified in this condition and 40CFR Part 64.9 for a minimum of five years.

COMPLIANCE ASSURANCE MONITORING PLAN (CAM) SPECIFIC REQUIREMENTS for Thermal Oxidizer C925 [VOC Control Device for P12S10 Selenium Plant Soil Vapor Extraction Well (D926)]

- A. For the purpose of this CAM plan, an exceedance shall be defined as when a combustion chamber temperature of less than 1400°F occurs when the equipment it serves is in operation or when a combustion chamber temperature of less than 700°F occurs during operation in catalytic mode. If the number of exceedances exceeds six 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 SCAQMD within 90 calendar days after the due date for the semi-annual monitoring period.
- B. The operator shall perform an annual verification of the accuracy of the thermocouple.

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN SPECIFIC REQUIREMENTS for Carbon Adsorber C517 [VOC Control Device for P9S1 Air Flotation Tank 1602 (D344)]

- A. For the purpose of this CAM plan, an exceedance shall be defined as when the hydrocarbon monitor reading indicates a VOC concentration of 500 ppmv or greater measured as methane at the outlet of the carbon adsorber and the operator does not divert the vent gas to a replacement carbon adsorber or stop the operation of the equipment vented to the carbon adsorber prior to the next monitoring event. If the number of exceedances exceeds six 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 SCAQMD within 90 calendar days after the due date for the semi-annual monitoring period.

- B. The operator shall perform QA/QC of the monitoring equipment in accordance with EPA Reference Method 21 requirements.

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN SPECIFIC REQUIREMENTS for Carbon Adsorber C977 [VOC Control Device for P9S1 Dissolved Gas Flotation Units V-3188 (D975) and V-3189 (D976); and P12S1 Tank 2520 (D432)]

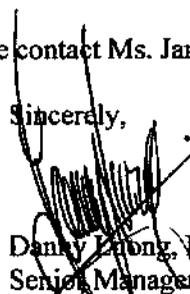
- A. For the purpose of this CAM plan, an exceedance shall be defined as when the hydrocarbon monitor reading indicates a VOC concentration of 500 ppmv or greater measured as methane at the outlet of the carbon adsorber and the operator does not divert the vent gas to an alternate control device or stop the operation of the equipment vented to the carbon adsorber prior to the next monitoring event. If the number of exceedances exceeds six 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 SCAQMD within 90 calendar days after the due date for the semi-annual monitoring period.
- B. The operator shall perform QA/QC of the monitoring equipment in accordance with EPA Reference Method 21 requirements.

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN SPECIFIC REQUIREMENTS for Thermal Oxidizer C978 [VOC Control Device for P9S1 Dissolved Gas Flotation Units V-3188 (D975) and V-3189 (D976); and P12S1 Tank 2520 (D432)]

- A. For the purpose of this CAM plan, an exceedance shall be defined as when a combustion chamber temperature of less than 1500°F occurs and the equipment it serves continues to operate. If the number of exceedances exceeds six 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 SCAQMD within 90 calendar days after the due date for the semi-annual monitoring period.
- B. The operator shall perform an annual verification of the accuracy of the thermocouple. Annual source testing shall be conducted to demonstrate the VOC destruction efficiency as required per SCAQMD Rule 1176.

If you have any questions, regarding this plan, please contact Ms. Janice West at 909-396-3763.

Sincerely,


Danny Luong, P.E.
Senior Manager
RECLAIM Admin., Refinery Permitting,
Retail Gasoline Dispensing

DL:JW

cc: Ed Pupka