

Minor Modification to a Covered Source
Review Summary

Application File No.: 0088-14 (Minor Modification)

Permit No.: 0088-01-C

Applicant: Chevron USA Products Company

Facility Title: Chevron Hawaii Refinery
Located at 91-480 Malakole Street, Kapolei, Oahu

Mailing Address: Chevron USA Products Company
Hawaii Refinery
91-480 Malakole Street
Kapolei, HI 96707

Responsible Official: Mr. Edward J. Wagner
Refinery Manager
Ph. (808) 682-5711

Point of Contact: Ms. Helen Mary Wessel
Environmental Specialist
Ph. (808) 682-2282

Application Date: March 28, 2008

Proposed Project:

SICC 2911 (Petroleum Refining)

The applicant is applying for a minor modification to existing Covered Source Permit (CSP) No. 0088-01-C. The FCCU is required by Consent Decree No. C 03-04650 (CRB) Section F (37A) to install qualifying controls on the FCCU heater (F-5300) no later than December 31, 2008.

The Hawaii Refinery had a facility outage in April 2008. During this facility outage, the F-5300 burners were replaced with Callidus Ultra Blue Burners which are the latest in NO_x reduction technology. The Ultra Blue Burners reduce NO_x emissions 40-50% lower than current Ultra Low NO_x Burners.

Per the Department of Health's letter dated April 7, 2008 and in accordance with Hawaii Administrative Rules (HAR), Section 11-60.1-82(k)(1), the Department approved the applicant proceeding with the installation and operation of the Callidus Ultra Blue Burners prior to issuance of this minor modification.

This application qualifies as a minor modification because this modification:

1. Does not increase the emissions of any pollutant above the permitted emission limits;
2. Does not result in the emission of any air pollutant not previously emitted;
3. Does not increase the emissions of any air pollutant identified in the application and not limited by the permit;

4. Does not violate any applicable requirement;
5. Does not involve significant changes to existing monitoring requirements or any relaxation or significant change to existing reporting or recordkeeping requirements in the permit.
6. Does not require or change a case-by-case determination of an emission limitation or other standard, a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
7. Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement, and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject; and
8. Are not modifications pursuant to any provision of Title I of the Act.

A permit modification application fee of \$200.00 was submitted by the applicant and processed.

Equipment Description:

Callidus Ultra Blue Burners installed in the FCCU heater F-5300.

Applicable Requirements:

This minor modification will not violate any applicable requirement including PSD requirements. All existing applicable requirements will continue to be met as stated in the covered source permit review for CSP No. 0088-01-C. The planned modification will not trigger the applicability of New Source Performance Standards (NSPS) under modification (no emission increases) or reconstruction (less than 50% of the new construction costs).

Best Available Control Technology (BACT):

A Best Available Control Technology (BACT) analysis is applicable only to new covered sources and significant modifications to covered sources that have the potential to emit or a net emissions increase above significant levels as defined in HAR §11-60.1-1. Since this is a minor modification, a BACT analysis is not applicable.

Consolidated Emissions Reporting Rule (CERR):

No change from Covered Source Permit 0088-01-C. This facility exceeds the Type A CER triggering levels. Therefore, this facility is subject to CER.

The Clean Air Branch also requests annual emissions reporting from those facilities that have facility-wide emissions of a single air pollutant exceeding in-house triggering levels. The emissions from this facility exceed the in-house triggering levels and thus annual emissions reporting is required for in-house recordkeeping purposes. In addition, annual emissions reporting is required since this is a covered source.

Compliance Assurance Monitoring (CAM):

No change from Covered Source Permit 0088-01-C. This facility is subject to CAM at first permit renewal.

Synthetic Minor Source:

No change from Covered Source Permit 0088-01-C. This facility is a major source, not a

synthetic minor source.

Insignificant Activities:

No change from Covered Source Permit 0088-01-C.

Alternate Operating Scenarios:

No change from Covered Source Permit 0088-01-C. There are no alternate operating scenarios proposed for this facility.

Project Emissions:

Emissions - FCCU Heater F-5300

Pollutant	Potential Emissions (lb/hr)	Potential Emissions (tpy)
NO _x	6.4	22.2

Ambient Air Quality Impact Assessment:

An ambient air quality impact assessment is not required for minor modifications to covered sources since there are no emission increases.

Significant Permit Conditions:

The following permit condition in the covered source permit were modified. As is custom when modifying regulatory language, new language is underlined, while [deleted language is shown in brackets].

Attachment II(I), Special Condition No. A.1 – Equipment Description

- c. One (1) – 61 MMBtu/hr furnace identified as F-5300 equipped with Callidus Ultra Blue Burners.

Conclusion and Recommendations:

The proposed minor modification will not result in any emission increases. All applicable state and federal regulations will continue to be met. Recommend approving the application for installing the Callidus Ultra Blue Burners in the FCCU heater F-5300 by amending the covered source permit. A 45-day EPA review period is also required.

Reviewer: Darin Lum
Date: 6/2008