

# *South Coast Air Quality Management District*

## *Statement of Basis*

### *Proposed Title V Permit*

(Proposed for Public Review: 7/07/08)

**Facility Name:** Ultramar Refinery  
**Facility ID:** 800026  
**SIC Code:** 2911  
**Facility Address:** 2402 E. Anaheim Street  
Wilmington, CA 90744

**Application Number:** 337243  
**Application Submittal Date:** 2/27/98

**AQMD Contact Person:** Bhaskar Chandan, Senior Air Quality Engineer  
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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.

The South Coast Air Quality Management District (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. AQMD also has published a draft of the Technical Guidance Document for Title V (March 2005, Version 4.0) available on the AQMD website at <http://www.aqmd.gov/titlev/TGD.html>.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant in the South Coast Air Basin. The Basin is in attainment with National Ambient Air Quality Standards (NAAQS) for NO<sub>2</sub>, SO<sub>2</sub>, CO, and lead. The status for CO was redesignated from nonattainment to attainment in June 2007 (72 FR 26718). The status for PM-10 is currently serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued for the refinery operations of Ultramar, Inc., which are located at 2402 E. Anaheim Street, Wilmington, CA 90744. The refinery is owned by Ultramar Inc., which is a Valero Company. It is subject to Title V requirements because it is a major source and is subject to certain NSPS (New Source Performance Standards) and NESHAP (National Emission Standards for Hazardous Air Pollutants) requirements.

Ultramar also operates a Marine Terminal (Facility I.D. 800198) (leased from the Port of Los Angeles), which is located at 961 W. La Paloma in Wilmington, California and Marine Tank Farm (Facility I.D. 127648) (leased from the Los Angeles Department of Water and Power) located at 130 West A Street in Wilmington. Raw, intermediate, and finished materials are transferred between Ultramar's Marine Terminal and Marine Tank Farm via pipeline. These materials are also transferred between the marine tank farm and the refinery via pipeline. Ultramar has been issued permits to operate for equipment at the Olympic Tank Farm (ID 127749) (leased from the Los Angeles Department of Water and Power), which is located at 1220 N. Alameda in Wilmington. Ultramar is not currently utilizing this facility but they expect to be utilizing the Olympic Tank Farm in lieu of the Marine Tank Farm by early 2011.

Ultramar's Marine Terminal and Olympic Tank Farm have applied for their own separate Title V permits. The Title V permits for these facilities are expected to be issued shortly. Ultramar's Marine Tank Farm is not subject to Title V permitting requirements.

## **2. Facility Description**

This refinery is owned and operated by Ultramar Inc., which is a Valero Company. The refinery processes crude oil into various petroleum products such as gasoline, diesel, jet fuel, fuel oil, Liquefied Petroleum Gases (LPG), and coke. Currently, the Ultramar refinery has a capacity to process approximately 80,000 barrels of crude oil per day. The refinery utilizes several processes to separate petroleum components in crude oil and to convert heavy components into lighter hydrocarbon compounds. These hydrocarbon compounds are used as blending components for gasoline, diesel, and other products.

Operations at Ultramar refinery include the following major processes:

### Crude and Vacuum Distillation Units

These units are the first major processing units in the refinery flow. They are used to separate the crude oil by distillation into fractions according to boiling points. The products from these units are gases (propane, butane, etc), gasoline, naphtha, diesel, gasoil, and straight run and vacuum residual.

### Fluid Catalytic Cracking Unit (FCCU)

The FCCU converts heavy gasoil into lighter hydrocarbon compounds. The process is called the "cracking process." It involves mixing gasoil feed with fluidized catalyst in a reactor under appropriate temperature and pressure. The FCCU produces a large quantity of gasoline blending components and feed stocks for the alkylation operations.

### Isomerization (Butamer) Unit

The isomerization unit changes straight-chain hydrocarbon molecules into branched-chain hydrocarbons with higher octane rating. The product, isomerate, is a gasoline blending stock that is extremely low in benzene.

### Reforming

Reforming converts naphtha fractions to products of higher octane value. Thermal reforming is a light cracking process applied to heavy naphthas to produce increased yields of hydrocarbons in the gasoline boiling range. Catalytic reforming is applied to various naphtha fractions, and primarily consists of the conversion of naphthenes and paraffins to aromatics. Hydrogen is an important byproduct of this process.

### Alkylation Unit

This unit produces alkylate, a high octane gasoline component by allowing olefin feed stock, such as butylenes, to react with isobutane in the presence of a catalyst. Ultramar uses a modified HF (hydrofluoric acid) alkylation process.

### Hydrotreating

Petroleum products are catalytically stabilized and impurities are removed from products or feedstocks by reacting them with hydrogen. Impurities removed by hydrotreating include sulfur, nitrogen, and oxygen. Hydrotreating is applied to a wide range of feedstocks, from naphtha to reduced crude oil. Most of the hydrogen utilized at the refinery is currently purchased from the Air Products and Chemical, Inc. Wilmington Hydrogen Plant.

### Blending

The various process units create blend stocks for gasoline, jet fuel and diesel. For example, alkylate, reformate, and FCC gasoline are all gasoline blend stocks. The blending process combines these blend stocks to assure that all finished products meet their specifications.

### Coking

Heavy residual oil and recovered oil are thermally cracked at a high temperature to produce light hydrocarbons and petroleum coke. Petroleum coke is transferred as a slurry to one of three hydrobins from which the coke is loaded into trucks for transport out of the refinery.

In addition to the above major processes, the facility operates other distillation and separation processes, numerous combustion units such as heaters and boilers that are utilized in many of the above processes, sulfur plants, stationary internal combustion engines, refinery flares, and wastewater treatment systems. Also, the facility uses fixed roof tanks, internal storage tanks, external storage tanks, and pressurized storage tanks to store crude oil, intermediate and finished products.

### **3. Construction and Permitting History**

The refinery has been in constant operation since 1969. Numerous permits to construct and permits to operate have been issued to the refinery since initial construction in 1969. The current permit to operate and/or permit to construct for each permit unit located at the refinery is contained in the Title V permit.

### **4. Regulatory Applicability Determinations**

Applicable legal requirements with which this refinery must comply have been identified in the Title V permit (for example, Sections D, E, and H of the proposed Title V permit). Device level condition H23.x denote applicability of federal regulations and source specific AQMD Rules to permitted equipment. 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) for this facility have been completed. Federal NSPS requirements of 40 CFR Part 60 apply to certain units at the facility and the permit terms and conditions may be found in Sections D and H of the Title V permit. NESHAP requirements of 40 CFR Parts 61 and 63 apply to certain units at the facility and the permit terms and conditions may be found in Sections D, H, and J of the Title V permit. Determinations of federal regulations that do not apply can be found in this section of the Statement of Basis.

This section contains a discussion of complex regulatory applicability determinations. This section also summarizes the NSPS and NESHAP applicability determinations for permitted equipment at this facility.

#### Federal Regulations

##### ***Standards of Performance for New Stationary Sources (NSPS) (40 CFR 60)***

With the exception of certain specific equipment as further explained in Tables 4.1 to 4.3 below, the refinery is generally subject to the following NSPSs:

- 40 CFR 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units;
- 40 CFR 60 Subpart J – Standards of Performance for Petroleum Refineries;
- 40 CFR 60 Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973 and Prior to May 19, 1978;
- 40 CFR 60 Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978 and Prior to July 23, 1984;
- 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Storage Vessels (Including Petroleum Liquids Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced July 23, 1984;
- 40 CFR 60 Subpart GGG – Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries;

- Subpart GGGa – Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for which Construction, Reconstruction, or Modification Commenced After November 7, 2006; and
- 40 CFR 60 Subpart QQQ – Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems.

The above regulations specify standards for applicable equipment within the refinery based on construction date or subsequent modifications that resulted in an emission increase as defined by 40 CFR 60.14(a) or reconstruction with a capital cost of the new components exceeding 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility as defined in 40 CFR 60.15(a) and (b). The applicability of the above rules is based on information contained in the permit application files or through refinery responses to information requests.

All of the equipment in the Title V Permit has been reviewed to determine whether they are subject to any of the NSPSs. Tables 4.1 to 4.3 below contain tabulated summaries of selected negative determinations regarding NSPS applicability.

**Table 4.1 Combustion Sources Not Subject to NSPS Requirements**

<b>Device ID</b>	<b>Equipment</b>	<b>Regulation</b>	<b>Summary of Non-Applicability Determination</b>
D377	Boiler	40 CFR 60, Subparts Db/Dc <sup>1</sup>	Capacity less than the 100 MMBtu/hr applicability threshold of NSPS Subpart Db and was constructed prior to the June 9, 1989 applicability date of NSPS Subpart Dc with no subsequent modification or reconstruction.
D378	Boiler	40 CFR 60, Subparts Db/Dc <sup>1</sup>	Capacity greater than the 10 - 100 MMBtu/hr applicability range of NSPS Subpart Dc and was constructed prior to the June 19, 1984 applicability date of NSPS Subpart Db with no subsequent modification or reconstruction.

<sup>1</sup> 40 CFR 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

**Table 4.2 Storage Tanks and Wastewater Systems Not Subject to NSPS Requirements**

<b>Device ID</b>	<b>Equipment</b>	<b>Regulation</b>	<b>Summary of Non-Applicability Determination</b>
D449 D848 D998	Storage Tank	40 CFR 60, Subpart K/Ka/Kb	Tanks are permitted to store inorganic liquids only.

Device ID	Equipment	Regulation	Summary of Non-Applicability Determination
D234 D245 D251 D279 D283 D974 D975 D979 D980 D981 D982 D990 D1610	Storage Tank	40 CFR 60, Subpart K/Ka/Kb	Storage capacity below threshold for the subject NSPSs.
D28 D1129	Storage Tank	40 CFR 60, Subpart K/Ka/Kb	Vapor pressure of permitted commodities is below the vapor pressure threshold of the subject NSPSs.
D284 D285 D286 D287 D288 D289 D290 D291 D292 D293 D294 D295 D296 D978 D1547	Storage Tank	40 CFR 60, Subpart K/Ka/Kb	These tanks are pressure vessels designed to operate in excess of 30 psig without emissions to the atm. except under emergency conditions.
D219 D220 D222 D223 D224 D276 D277 D278	Storage Tank	40 CFR 60, Subpart K/Ka/Kb	Tanks were constructed prior to June 11, 1973, and have not been modified or reconstructed since then.
D201 D210 D214 D215 D1000 D1003 D1006 D1133 D1224 D1225 D1226 D1227 D1240 D1241 D1405	Wastewater Treatment System	40 CFR 60, Subpart QQQ	Last modifications in 1979. No subsequent modifications or reconstruction.

**Table 4.3 Fugitive Components Not Subject to NSPS Requirements**

Device ID	Equipment	Regulation	Summary of Non-Applicability Determination
D1623	Fug. Comp. (P12S1)	40 CFR 60, Subpart GGG	Components associated with material loading or unloading. Not part of a process unit.
D1624	Fug. Comp. (P12S2)		
D1625	Fug. Comp. (P12S3)		
D1626	Fug. Comp. (P12S4)		
D1353	Fug. Comp. (P13S1)	40 CFR 60, Subpart GGG	Components associated with wastewater treatment systems. Not part of a process unit.
D1354	Fug. Comp. (P13S2)		

Device ID	Equipment	Regulation	Summary of Non-Applicability Determination
D1355	Fug. Comp. (P14S1)	40 CFR 60, Subpart GGG	Components associated with material storage. Not part of a process unit.
D1357	Fug. Comp. (P14S4)		
D1358	Fug. Comp. (P14S4)		
D1442	Fug. Comp. (P14S5)		
D1353	Fug. Comp. (P13S1)	40 CFR 60, Subpart GGG	Components associated with wastewater treatment systems. Not a process unit.
D1354	Fug. Comp. (P13S2)		
D1310	Fug. Comp. (P1S1)	40 CFR 60, Subpart GGG	Process unit was constructed prior to January 4, 1983, and has not been modified or reconstructed since then.
D1312	Fug. Comp. (P1S3)		
D1314	Fug. Comp. (P1S5)		
D1317	Fug. Comp. (P2S1)		
D1318	Fug. Comp. (P2S3)		
D1319	Fug. Comp. (P2S5)		
D1321	Fug. Comp. (P3S1)		
D1323	Fug. Comp. (P4S1)		
D1325	Fug. Comp. (P4S3)		
D1331	Fug. Comp. (P5S1)		
D1336	Fug. Comp. (P8S1)		
D1337	Fug. Comp. (P8S3)		
D1338	Fug. Comp. (P8S5)		
D1340	Fug. Comp. (P9S1)		
D1341	Fug. Comp. (P10S2)		
D1343	Fug. Comp. (P13S2)		
D1344	Fug. Comp. (P10S3)		
D1345	Fug. Comp. (P10S4)		
D1367	Fug. Comp. (P10S12)		
D1369	Fug. Comp. (P17S50)		
D1370	Fug. Comp. (P17S97)		
D1418	Fug. Comp. (P17S88)		

This refinery is not subject to the NSPSs listed below.

- 40 CFR 60 Subpart D - Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced after August 17, 1971. This refinery does not operate any steam generators that have a permitted heat capacity greater than 250 MMBtu/hr.

- 40 CFR 60 Subpart Da - Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978. This refinery does not meet the definition of an electric utility.
- 40 CFR 60 Subpart XX - Standards of Performance for Bulk Gasoline Terminals. This refinery does not own or operate a bulk gasoline terminal or pipeline breakout station at this location. The gasoline loading rack at this facility is subject to 40 CFR 63 Subpart CC as a Group 1 loading rack.
- 40 CFR 60 Subpart III- Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes. This refinery does not conduct any SOCMI operations.
- 40 CFR 60 Subpart NNN - Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations. The refinery does not conduct any SOCMI operations.
- 40 CFR 60 Subpart RRR - Standards of Performance for Volatile Organic Compound Emissions from Synthetic Organic Chemical. This refinery does not conduct any SOCMI operations.

***National Emission Standard for Hazardous Air Pollutants (NESHAP) (40 CFR 61 and 63)***

The refinery is generally subject to the following NESHAPs:

- 40 CFR 61 Subpart FF - National Emission Standard for Benzene Waste Operation,
- 40 CFR 63 Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries,
- 40 CFR 63 Subpart UUU - National Emission Standard for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units,
- 40 CFR 63 Subpart EEEE - National Emission Standard for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline), and
- 40 CFR 63 Subpart GGGGG – National Emission Standard for Hazardous Air Pollutants for Site Remediation.

Each of these standards, as applicable to the Ultramar refinery, is incorporated into the Title V permit.

***40 CFR 61 Subpart FF***

40 CFR 61 Subpart FF-National Emission Standard for Benzene Waste Operations (Benzene Waste NESHAP) defines a major source as any chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery with 10 megagram per year (Mg/yr) (11 tons/yr) or more of benzene in the waste streams. This regulation requires a major source to control benzene in any waste streams that contain 10 parts per million by weight (ppmw) or more of benzene. It requires the removal or destruction of the benzene contained in the waste using a treatment process or waste water treatment system that either a) removes benzene from the waste stream to a level less than 10 ppmw on a flow-weighted annual average basis, b) removes benzene from

the waste stream by 99 percent or more on a mass basis, or c) destroys benzene in the waste stream by incinerating the waste in a combustion unit that achieves a destruction efficiency of 99 percent or greater for benzene.

The regulation also specifies a standard for each waste management unit that receives or manages the waste stream before and during treatment of the waste stream. Waste management unit includes tanks, surface impoundments, containers, individual drain systems, and oil water separators.

Condition P13.2 has been tagged to all processes that contain benzene waste streams that are subject to Subpart FF. All of these waste streams are subject to the recordkeeping and reporting requirements of 40 CFR61.356 and 61.357, respectively. Where applicable, waste management units and waste treatment systems subject to Subpart FF have been identified in the permit by specifying the 500 ppm VOC limit in the “Emissions and Requirements” column and/or condition S13.7, H23.13, and H23.25 in sections D and H of the Title V permit. The emission limit and condition have been tagged with Subpart FF. The listing in the “Emissions and Requirements” column also references Section J of the permit where the applicable Subpart FF requirements are contained.

The following equipment have been identified in the permit as subject to equipment-specific requirements of Subpart FF based on information contained in the individual equipment permit files or based on the refinery’s Subpart FF report submitted to EPA as required by 40 CFR 61.357:

**Table 4.4 Equipment Subject to Benzene NESHAP**

<b>Process No.</b>	<b>System No.</b>	<b>Equipment</b>
13 (Oil/Wtr. Separation)	1 (Wastewater Treatment)	Oil-Water Separator (s)
13 (Oil/Wtr. Separation)	1 (Wastewater Treatment)	Induced Gas and Air Flotation Units
13 (Oil/Wtr. Separation)	1 (Wastewater Treatment)	Sump(s)
13 (Oil/Wtr. Separation)	1 (Wastewater Treatment)	Tank(s)
13 (Oil/Wtr. Separation)	1 (Wastewater Treatment)	Sludge Hopper
13 (Oil/Wtr. Separation)	2 (WW Separation & Storage)	Storage Tank(s)
14 (Storage Tanks)	1 (Fixed Roof Tanks)	Storage Tank(s)
14 (Storage Tanks)	4 (Mobile Tanks)	Storage Tank(s)

40 CFR 63 Subpart CC

The Ultramar refinery is also a major source under the definition of 40 CFR 63 Subpart CC (NESHAP from Petroleum Refineries). This rule seeks to reduce the emissions of eleven air toxics, including benzene. The rule requires controls for emissions of air toxics from storage tanks, equipment leaks, process vents, and wastewater collection and treatment system. For each equipment subject to Subpart CC, “HAP” is listed in the “Emissions and Requirements” column of sections D and H of the Title V permit along with a reference to Section J of the permit, which contains the emission limits and requirements for Subpart CC.

The following equipment have been identified in the permit as subject to Subpart CC based on the refinery's Notification of Compliance Status report submitted to EPA as required by 40 CFR 63.654(f) and/or based on a response to additional information requested by the AQMD:

**Table 4.5 Group 1 Storage Vessels**

(Storage vessels with a capacity of  $\geq 177 \text{ m}^3$ , and vapor pressure  $\geq 10.4 \text{ kPa}$  (maximum) and  $\geq 8.3 \text{ kPa}$  (annual average), and Organic Liquid HAP concentration  $> 4\%$  by weight (annual average))

Process No.	System No.	Equipment
14 (Storage Tanks)	2 (External Floating Roof Tanks)	Storage Tank
14 (Storage Tanks)	9 (Domed Ext. Floating Roof Tanks)	Storage Tank

**Table 4.6 Group 1 Wastewater Streams, Existing/New Source**

Process No.	System No.	Equipment
None	None	None

**Table 4.7 Group 1 Process Vents, Existing/New Source**

(Process vents containing organic HAP concentration  $\geq 20 \text{ ppmv}$ , and total VOC emissions  $\geq 33 \text{ kg/day}$ )

Process No.	System No.	Equipment
None	None	None

**Table 4.8 Group 1 Gasoline Loading Rack, Existing/New Source**

Process No.	System No.	Equipment
12 (Loading/Unloading)	4 (Tank Truck Bulk Loading)	Loading Rack

**Table 4.9 Equipment Leaks, Existing Source**

(Equipment containing or contacting fluid that is 5% by weight total organic HAPs)

Process No.	System No.	Equipment
1 (Crude Distillation)	1 (Crude Distillation Unit)	Fugitive Emissions
1 (Crude Distillation)	3 (Crude Unit No. 11)	Fugitive Emissions
2 (Coking & Resid. Conditioning)	1 (Delayed Coking Unit No. 30)	Fugitive Emissions
2 (Coking & Resid. Conditioning)	3 (Delayed Coking Unit No. 31)	Fugitive Emissions
2 (Coking & Resid. Conditioning)	5 (Delayed Coking Blowdown)	Fugitive Emissions
3 (Catalytic Cracking)	1(FCCU)	Fugitive Emissions
4 (Hydrotreating)	1 (Gas Oil Unibon Hydrotreating)	Fugitive Emissions

Process No.	System No.	Equipment
4 (Hydrotreating)	3 (Naphtha Hydrotreating Unit 60)	Fugitive Emissions
4 (Hydrotreating)	5 (Gas Oil Hydrodesulfurization)	Fugitive Emissions
4 (Hydrotreating)	7 (Naphtha Hydrotreater/Splitter)	Fugitive Emissions
5 (Catalytic Reforming)	1 (Platformer Unit No. 70)	Fugitive Emissions
7 (Alkylation and Isomerization)	1 (Alkylation Unit No. 68)	Fugitive Emissions
7 (Alkylation and Isomerization)	3 (Butamer Unit No. 69)	Fugitive Emissions
8 (Gas Production)	1 (FCCU Gas Plant/Frac. Unit)	Fugitive Emissions
8 (Gas Production)	2 (FCCU Gas Plant/Compression)	Fugitive Emissions
8 (Gas Production)	3 FCCU Gas Plant/ LPG Drying)	Fugitive Emissions
8 (Gas Production)	4 (Light Ends VRU No. 43)	Fugitive Emissions
8 (Gas Production)	5 (Light Ends VRU No. 44)	Fugitive Emissions
10 (Treating/Stripping)	4 (FCC Gasoline Merox Unit 66)	Fugitive Emissions
10 (Treating/Stripping)	10 (Amine Treating Unit No. 51)	Fugitive Emissions
10 (Treating/Stripping)	11 (Amine Treating Unit No. 55)	Fugitive Emissions
13 (Oil/Wtr Separation)	1 (WW Treatment System)	Fugitive Emissions
14 (Storage Tanks)	4 (Mobile Tanks)	Fugitive Emissions
17 (Air Pollution Control)	10 (Gasoline TT Loading VRS)	Fugitive Emissions
17 (Air Pollution Control)	11 (VRS Serving WWTS)	Fugitive Emissions

**Table 4.10 Group 2 Process Vents /Storage Vessels/ Wastewater Streams**  
(Storage vessels with a capacity of  $\geq 177$  m<sup>3</sup>, and vapor pressure  $\geq 10.4$  kPa (maximum) and  $\geq 8.3$  kPa (annual average), and Organic Liquid HAP concentration  $< 4\%$  by weight (annual average), and process vents that are not group 1)

Process No.	System No.	Equipment
10 (Treating/Stripping)	14 (Sour Wtr Se Conc. Unit)	Storage Tank(s)
13 (Oil/Wtr Separation)	1 (WW Treatment System)	Air Flotation Unit
13 (Oil/Wtr Separation.)	1 (WW Treatment System)	API Separator
13 (Oil/Wtr Separation.)	1 (WW Treatment System)	Drain System
13 (Oil/Wtr. Separation)	2 (WW Separation & Storage)	Storage Tank
14 (Storage Tanks)	2 (Ext. Floating Roof Tanks)	Storage Tank(s)
14 (Storage Tanks)	4 (Mobile Tanks)	Storage Tank(s)
14 (Storage Tanks)	7 (Int. Floating Roof Tanks)	Storage Tank(s)
14 (Storage Tanks)	9 (Domed EFR Tanks)	Storage Tank(s)

40 CFR 63 Subpart UUU

Subpart CC addresses the emissions of air toxics from miscellaneous process vents in petroleum refineries. However, it does not address emissions from process vents on catalytic cracking units, catalytic reforming units, and sulfur recovery units. To address air toxics emissions from these sources, EPA adopted 40 CFR 63 Subpart UUU- National Emission Standard for

Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units (CCUs), Catalytic Reforming Units (CRUs), and Sulfur Recovery Units (SRUs).

For equipment that is subject to Subpart UUU, the regulated pollutant is listed in the “Emissions and Requirements” column of sections D and H of the Title V permit. This listing references Section J of the permit, which contains the emission limits and requirements of Subpart UUU.

The following equipment have been identified in the permit as subject to the requirements of this rule based on engineering knowledge of the process, permit, and the rule:

**Table 4.11 Fluid Catalytic Cracking Unit**

Process No.	System No.	Equipment
3 (Catalytic Cracking)	1 (FCCU)	Regenerator
3 (Catalytic Cracking)	3 (FCCU Control)	Electrostatic Precipitators

Ultramar’s FCCU is also subject to 40CFR60 Subpart J. As specified in Table 1 of Subpart UUU, FCCUs, which are also subject to 40CFR60 Subpart J, are subject to a PM emission limit of 1 lb. per 1000 lb. of coke burnoff and an opacity limit of 30 percent (except for one 6-minute average opacity reading in any one-hour period). As specified in Table 8 of Subpart UUU, the FCCU is subject to a CO emission limit of 500 ppmvd (as measured, 1-hour avg.).

**Table 4.12 Catalytic Reforming Unit**

Process No.	System No.	Equipment
5 (Cat. Reforming & Isomer.)	1 (Platformer Unit 70)	Catalyst Hopper
5 (Cat. Reforming & Isomer.)	1 (Platformer Unit 70)	Lift Engager Vessel
5 (Cat. Reforming & Isomer.)	1 (Platformer Unit 70)	Reactor(s)
5 (Cat. Reforming & Isomer.)	1 (Platformer Unit 70)	Regeneration Tower
5 (Cat. Reforming & Isomer.)	1 (Platformer Unit 70)	Chloride Treaters

Ultramar’s CRU is subject to the inorganic HAP limit for existing continuous catalytic reforming units. As specified in Table 22 to Subpart 22, existing continuous CRUs must reduce uncontrolled emission of HCl by 97 percent (wt.) using a control device or to a concentration of 10 ppmvd (3% O<sub>2</sub>). Ultramar installed a Chlorsorb™ System to comply with this HCl emission control requirement. As specified at 40CFR63.1562(e)(5), Ultramar’s CRU is not subject to the organic HAP limit of this regulation since the vent stream is routed to the refinery fuel gas system.

**Table 4.13 Sulfur Recovery Unit(s)**

Process No.	System No.	Equipment
11 (Sulfur Production)	1 (SRU No. 1)	final condenser
11 (Sulfur Production)	2 (SRU No. 2)	final condenser

Ultramar’s SRUs, which each have a capacity greater than 20 long tons per day, utilize reduction control systems. The SRU is equipped with a tailgas incinerator (C1260) that is utilized only during process upset conditions. Since both SRUs are also subject to 40CFR60 Subpart J, they are subject to an SO2 emission limit of 300 ppmv (dry, 0% excess O2) as specified in Table 29 to Subpart UUU.

40 CFR 63 Subpart EEEE

This NESHAP applies to Organic Liquid (Non-Gasoline) Distribution operations that are located at or are part of a major source of HAPs and that are not subject to another part 63 standard such as 40 CFR 63 Subpart CC. Organic liquids are defined as all crude oils, regardless of HAP compositions, and non-crude oil liquids that contain at least 5 percent organic HAP and have an annual average true vapor greater than 0.1 psia. The standard covers storage tanks, transfer racks, equipment leak components and transport vehicles that handle organic liquids.

The facility has identified the equipment in the table below as being an affected source under this NESHAP. This equipment is subject to this NESHAP based on its permitted ability to handle crude oil. Since the equipment is used exclusively for unloading, no controls are required per Table 2 – Emission Limits, and no work practice standards apply per Table 4 – Work Practice Standards.

**Table 4.14 Affected Sources under 40 CFR 63 Subpart EEEE**

Process No.	System No.	Equipment
12 (Loading/Unloading)	1 (Crude and Gas Oil Tank Truck Unloading )	Unloading Rack

Per 40CFR63.328(c)(1), all equipment leak components associated with this affected source are excluded, since all pumps, valves, and piping associated with these sources are part of an affected source under 40 CFR 63 Subpart CC. All storage tanks and transfer racks not identified as an affected source under this subpart are generally part of the affected sources under 40 CFR 63 Subpart CC.

40 CFR 63 Subpart GGGGG

This NESHAP is applicable to site remediation activities located at facilities that are a major source of HAP emissions and have at least one other source category that is regulated by a part 63 standard. This standard does not cover site remediation activities performed under CERCLA or RCRA. Affected sources include: remediation process vents, remediation material management units (tanks, containers, oil-water separators, transfer systems, etc.), and equipment leak components.

According to Ultramar, the refinery is subject to this NESHAP due to soil excavation and spill response activities that may qualify as site remediation as defined in this regulation. The facility does not have any ongoing in-situ or ex-situ remediation processes such as soil vapor extraction, bioremediation or air stripping processes. The refinery uses the 30-day Short Term Exemption, described in 63.7884(b), to demonstrate compliance with of all site remediation activities subject

to this NESHAP. Site remediation activities that qualify for the 30-day Short Term Exemption are not subject to the standards specified in 63.7885 through 63.7955 of the regulation. Applicability of this regulation is specified in the Title V permit at a facility level with condition F52.2

NESHAP Non-applicability

This refinery is not subject to the NESHAPs listed below.

- 40 CFR 61 Subpart J - National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene. This refinery does not operate any equipment in “benzene service.”
- 40 CFR 61 Subpart Y - National Emission Standards for Benzene Emissions from Benzene Storage Vessels. This refinery does not store or transfer benzene.
- 40 CFR 61 Subpart BB - National Emission Standards for Benzene Emissions from Benzene Transfer Operations. This refinery does not store or transfer benzene.
- 40 CFR 63 Subpart F - National Emission Standards for Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry. This refinery does not operate any SOCOMI operations.
- 40 CFR 63 Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater. This refinery does not operate any SOCOMI operations.
- 40 CFR 63 Subpart H - National Emission for Organic Hazardous Air Pollutants for Equipment Leaks. This refinery does not operate any SOCOMI operations.
- 40 CFR 63 Subpart Q - National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers. This refinery does not use chromium based water treatment chemicals.
- 40 CFR 63 Subpart R - National Emission Standards for Hazardous Air Pollutants for Gasoline Distribution Facilities. This refinery does not own or operate a bulk gasoline terminal or pipeline breakout station at this location.
- 40 CFR 63 Subpart VV - National Emission Standards for Oil-Water Separators and Organic-Water Separators. This subpart is not applicable because no other subpart of 40 CFR Part 60, 61, or 63 references this subpart, even though this refinery controls emissions from oil-water and organic-water separators.
- 40 CFR 63 Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This subpart does not apply because this refinery does not own or operate stationary reciprocating internal combustion engines with a site rating of more than 500 brake horsepower.
- 40 CFR 63 Subpart EEE - National Emission Standards for Hazardous Air Pollutants for Hazardous Waste Incinerators. There are no hazardous waste incinerators, cement kilns, or aggregate kilns located at this refinery.

### ***Compliance Assurance Monitoring (CAM) (40 CFR 64)***

This regulation requires facilities of major sources to submit CAM plans to accompany the application for renewal of their respective Title V permits or for initial Title V applications submitted after 4/20/98. Since this application is an initial application submitted prior to 4/20/98, no CAM plans are required at this time.

### **5. Periodic Monitoring 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 J and Appendix B of the proposed Title V permit).

This refinery is subject to RECLAIM monitoring, source test requirements, and other monitoring provisions that are required by federal, state or AQMD laws and regulations. Section F of the permit contains the monitoring and source test permit conditions imposed by Regulation XX. More specifically, it summarizes the monitoring and testing requirements for Major, Large and Process units at NO<sub>x</sub> and SO<sub>x</sub> RECLAIM facilities. Finally, Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not currently apply to any of the permitted emission sources at this facility.

As specified in AQMD Rule 3004(a)(4), the proposed permit includes periodic monitoring conditions for equipment that is subject to SIP-approved, federally enforceable rules, which do not require sufficient monitoring to assure compliance with emission limitations or other requirement of the rule. Permit conditions in Section D and H of the permit that fulfill Title V periodic monitoring requirements are tagged with the following: *Rule 3004(a)(4)-Periodic Monitoring, 12-12-1997*. These periodic monitoring conditions are also tagged with the underlying rule(s) for which the condition is fulfilling the monitoring requirement. In some cases, existing monitoring conditions that were installed under NSR fulfill the periodic monitoring requirements for other rules or regulations. For these cases, the monitoring condition was tagged with Rule 3004(a)(4) and the underlying rule(s) for which the condition is fulfilling the monitoring requirement.

A draft Periodic Monitoring Guidance document was published by the AQMD in August 1997. A public consultation was held to solicit public input. The final Periodic Monitoring Guideline Document was published by the AQMD in November 1997. This guideline was used to establish the periodic monitoring requirements in the Title V permit. In addition, the AQMD used the CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Requirements in SIP (June 24, 1999) for applicable opacity limits, grain loading limits for material handling equipment, and for sulfur content of fuels. Furthermore, the AQMD used the CAPCOA/ARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP for combustion sources (July 2001). These documents are included in Appendix II.

## 6. Title V Permit Format

The Title V permit consists of eleven sections and two appendices. Each section is devoted to a particular function as summarized below:

### **Section A Facility Information**

This section contains operator name, facility location and mailing address. It also lists the name of the responsible official and contact person for the facility. Lastly, this section indicates whether Regulation XXX and RECLAIM apply to the facility.

### **Section B RECLAIM Annual Emission Allocation**

This section applies to RECLAIM facilities only and lists NO<sub>x</sub> and SO<sub>x</sub> allocations for the facility. This facility is subject to both the NO<sub>x</sub> and SO<sub>x</sub> requirements of RECLAIM.

### **Section C Facility Plot Plan**

This section is reserved for the development of the facility plot plan in the future.

### **Section D Facility Description and Equipment Specific Conditions**

This section describes equipment at the refinery that has been issued permits to operate. It also includes facility-wide operating conditions, emission limitations, the rules for which the emission limits and permit conditions are derived, and the periodic monitoring requirements as appropriate. The description of the process and equipment is structured in the following manner:

#### Process

A process is the largest grouping of equipment under the Title V permit, which includes all equipment involved in the making of final product from raw feed. A process can end at an intermediate product if the succeeding process is significantly different.

#### System

A system is the combination of equipment into a unit which is a logical subsystem of a process. A system can be used to identify individual process lines, or it can separate a long process line into separate functions. The main use of this grouping will be to separate a large process into manageable groups.

#### Equipment

This column describes equipment contained within a system or a process. It contains information necessary to identify equipment and ensure compliance with rules and regulations such as dimensions of a tank, heat input of a heater, horsepower of an engine, etc.. This section also lists the equipment application number (A/N). The A/N is an identification number issued by the AQMD to the application submitted by the applicant for a Permit to Construct or Permit to Operate for a piece of equipment. A facility is required to submit a permit

application when it plans to install a new piece of equipment, alter an existing piece of equipment, or modify a permit condition. An A/N in the Title V permit changes each time the AQMD approves a new application.

#### Device Identification (I.D.) Number

Each piece of equipment is assigned a unique I.D. number. When a piece of equipment is modified it retains its existing I.D. number. However, when it is removed from service, the I.D. number is retired and will not be used to identify another piece of equipment at this facility.

#### Connected to

This column is used to identify air pollution control equipment that is connected to a specific piece of equipment at the refinery.

#### RECLAIM Source Type/Monitoring Unit

This column is used to identify equipment classification pursuant to the RECLAIM program. The classification of major source, large source and process units are defined in Rule 2012. The equipment classification is assigned to NO<sub>x</sub> and SO<sub>x</sub> emission sources subject to RECLAIM. Each classification of equipment is subject to a specific monitoring requirement under RECLAIM.

#### Emissions and Requirements

This column lists emission limits applicable to each piece of equipment. It also lists the rules for which the limits were derived. If AQMD adopted a rule that has not yet been approved into the State Implementation Plan (SIP), emission limits established by both the SIP-approved and non SIP-approved versions of the rule are included in the permit.

#### Conditions

This column lists specific permit conditions applicable to the facility, process, system or equipment. A facility level condition applies to the whole facility and is designated by the letter F. The process conditions apply to the entire process and are designated by the letter P. The system conditions apply to the entire system and are designated by the letter S. The equipment (device) level conditions are designated by other letters depending on the category of conditions such as monitoring, recordkeeping, etc. Each permit condition references the law or rule for which the requirements in the condition were derived. If AQMD adopted a rule that has not yet been approved into the SIP, emission limits established by both the SIP-approved and non SIP-approved versions of the rule are included in the permit. One category of the device level condition is the periodic monitoring condition.

### **Section E Administrative Conditions**

This section contains general administrative permit conditions that apply to all facilities. The conditions listed in this section apply to all permitted equipment at

the facility unless superseded by other conditions listed elsewhere in the facility permit.

**Section F RECLAIM Monitoring & Source Testing Requirements**

This section contains monitoring and source testing permit conditions imposed by Regulation XX. It summarizes the monitoring and testing requirements for Major, Large and Process units at RECLAIM facilities.

**Section G RECLAIM Recordkeeping & Reporting Requirements**

This section contains recordkeeping and reporting requirements specified in Regulation XX. It summarizes the recordkeeping and reporting requirements for RECLAIM sources.

**Section H Permit to Construct and Temporary Permit to Operate**

The permit format in this section is the same as described for Section D above. However, equipment listed in this section has not been issued permits to operate, but were issued a permit to construct and/or a temporary permit to operate.

**Section I Compliance Plans & Schedules**

This section lists active compliance plans specified in the SIP-approved rules.

**Section J Air Toxics**

This section lists permit conditions pertaining to Federal NESHAP/MACT requirements.

**Section K Title V Administration**

This section lists the Title V administrative conditions. They are the same for all Title V facilities, except for the list of applicable rules table at the end of the section. The table at the end of the section lists all applicable rules referenced in Sections D and H (emission limit and conditions) and any rules that are referenced to the facility. This table also indicates which rules are federally enforceable and which are only enforceable by AQMD.

**Appendix A NO<sub>x</sub> and SO<sub>x</sub> Emitting Equipment Exempt from Written Permit Pursuant to Rule 219**

This section lists classes of NO<sub>x</sub>- and SO<sub>x</sub>- emitting Rule 219 exempt equipment present at the facilities that are subject to RECLAIM.

**Appendix B Rule Emission Limits**

Some emission limits that are too complex to be listed in the Emissions and Requirements column of Sections D and H are listed in Appendix B of the Title V permit. Emission limits in this appendix are referenced by an emission type “(9)” in the “Emissions and Requirements” column of the permit.

## **7. Permit Features**

### 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. Incorporation of 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 AQMD Rule 3004 (c). This facility has not applied for a permit shield for any of the equipment at the refinery.

### Alternate Operating Scenarios

An alternative operating scenario (AOS) is a set of provisions and conditions in a permit that allow the operator to switch back and forth between alternative modes of operation without submitting an application for a permit revision before each switch. However, each AOS must be evaluated for compliance with AQMD rules and regulations and applicable State and Federal requirements. AOS is addressed in AQMD Rule 3005 (j). This facility has not applied for an AOS for any of the equipment at the refinery.

### Emissions Trading

This facility is subject to the NO<sub>x</sub> and SO<sub>x</sub> emissions trading requirements under Regulation XX.

### Prevention of Significant Deteriorations (PSD) Permits

PSD is a federal program for permitting new and modified sources that emit air pollutants for which the AQMD is classified as in attainment with the National Ambient Air Quality Standards (NAAQS). This facility has not been issued a PSD permit by either the EPA or the AQMD.

### EPA New Source Review (NSR) Permits

NSR is a federal program for permitting new and modified sources that emit air pollutants for which the AQMD is classified as in Non-attainment with NAAQS. Before SIP-approval of the AQMD NSR Rule in 1978, EPA issued NSR permits for new construction and/or equipment modifications in the AQMD. A check of the records indicates that there are no NSR permits issued by the EPA for the Ultramar refinery.

## **8. Summary of Emissions and Health Risks**

### Summary of Refinery Criteria Air Pollutant and Toxic Air Contaminant Emissions

This section contains a summary of the Criteria Air Pollutant (CAP) and Toxic Air Contaminant (TAC) emissions for the refinery as reported in the refinery's Annual Emission Report (AER) for fiscal year 2006-2007.

**Table 8.1 Criteria Pollutant Emissions (tons/year)  
from Annual Reported Emissions for Reporting Fiscal Year 2006 – 2007**

Pollutant	Emissions (tons/year)
NOx	342
CO	162
VOC	129
PM	106
SOx	524

**Table 8.2 Toxic Air Contaminants Emissions (TAC)  
Annual Reported Emissions for Reporting Year 2006 – 2007**

The Following TACs Were Reported	Emissions (lbs/yr)
1,1,2,2-Tetrachloroethane	0.002
1,2,4-Trimethylbenzene	347
1,3-Butadiene	94.
2-Methyl naphthalene [PAH, POM]	0.13
3-Methylcholanthrene	0.03
7,12-Dimethylbenz[a]anthracene	0.006
Acenaphthene	0.16
Acenaphthylene	0.15
Anthracene	0.65
Acetaldehyde	6734
Acrolein	2.2
Ammonia	72829
Arsenic	6.3
Benzo(ghi)perylene	0.06
Benz[a]anthracene	0.23
Benzene	855
Benzo[a]pyrene	0.05
Benzo[b]fluoranthene	0.04
Benzo[e]pyrene [PAH, POM]	0.008
Benzo[j]fluoranthene	0.01
Benzo[k]fluoranthene	0.03
Beryllium	0.15
Cadmium	1.2
Chromium (VI)	2.5
Chrysene	0.29
Copper	8.5
Di (2-ethylhexyl) phthalate	7.1
Dibenz[a,h]anthracene	0.03
Diesel engine exhaust, particulate matter	4292
Ethylbenzene	233
Fluoranthene	0.36

The Following TACs Were Reported	Emissions (lbs/yr)
Fluorene	78.
Formaldehyde	2455
Hexane	2181
Hydrochloric acid	585.
Hydrogen fluoride (hydrofluoric acid)	44.5
Hydrogen sulfide	8023
Indeno[1,2,3-cd]pyrene	0.03
Lead (inorganic)	10.7
Methyl t-Butylether	15.3
Manganese	31.3
Mercury	5.6
Methyl chloride {Chloromethane}	0.08
Methyl ethyl ketone	22.9
Naphthalene	36.8
Nickel	47.5
PAHs, total, with components not reported	252
Phenanthrene	18.6
Pyrene	0.36
Perchloroethylene	14.2
Perylene [PAH, POM]	0.01
Phosphorus	6.2
Selenium	3.7
Styrene	0.60
Toluene	856
Xylenes	728
o-Xylene	13.8

Health Risk from Toxic Air Contaminants

The Ultramar refinery is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved in 2002 with the following risk factors.

Cancer Risk	6.08 in one million
Acute Hazard Index	0.80
Chronic Hazard Index	0.07

**9. Compliance History**

The Ultramar refinery is subject to the terms of a consent decree entered by the U.S. District Court (Western District of Texas) on November 23, 2005; and a Hearing Board Order entered for Case No. 3845-69 regarding compliance with District Rule 1118.

Consent Decree (Civil Action No. SA-05-CA-0569)

In 2000, the United States Environmental Protection Agency (USEPA) initiated a nationwide, broad-based compliance and enforcement initiative involving the petroleum refining industry. As a result

of this initiative, the subject Consent Decree is the product of a settlement between Valero and EPA over alleged violations of certain Clean Air Act and CERCLA/EPCRA provisions. This comprehensive settlement covers Valero refineries located in Benicia and Wilmington, California; Corpus Christi (two refineries), Houston, Sunray, Texas City and Three Rivers, Texas; Krotz Springs and St. Charles Parish, Louisiana; Ardmore, Okla.; Denver, Colo.; and Paulsboro, N.J.

As part of the Consent Decree, Valero agreed to install additional air pollution control equipment and implement other enhancements to air pollution management practices at its refineries to reduce air emissions. Specifically for the Wilmington Refinery, Valero agreed to the following:

- Establish new CO, PM, NO<sub>x</sub>, and SO<sub>x</sub> emissions limits for the FCCU regenerator.
- All heaters, boilers, flares, SRUs, and FCCU, which were not already subject to 40CFR60 Subpart J, became affected sources subject to this NSPS. As required by the Consent Decree, Ultramar submitted applications to the AQMD to integrate these requirements into the refinery's RECLAIM facility permit. These requirements are included in the proposed Title V permit.
- Enhancement of the Benzene Waste Operations NESHAP (40CFR61 Subpart FF) program.
- Enhancements of the Leak Detection and Repair (LDAR) program.
- Implementation of new investigative, reporting, and corrective action procedures for flares.

#### Variance(s)

*Hearing Board Case No. 3845-69:* AQMD Rule 1118 was amended in November of 2005. Subsection (g)(3) of the amended rule specifies that owners or operators with flares subject to the rule shall install and operate a flare monitoring system (FMS) by July 1, 2007 to perform monitoring and recording of the parameters specified in the second section of Table 1 of the rule. This monitoring includes gas flow, gas higher heating value (HHV), and total sulfur concentration (TSC) of the gas. Subsections (g)(3) and (j)(1)(C) contain performance specifications for the monitors. Rule 1118(j)(1)(C) also requires that the accuracy of the flow meter be verified annually according to manufacturer specifications. Additionally, Rule 1118 contains reporting requirements that are based on these monitoring requirements.

The Ultramar Refinery operates the following three General Service Flares that are subject to Rule 1118: Phase 0 Flare (C401), Phase I Flare (C402) and Phase II Flare (C403).

At the time of the rule adoption, technical challenges and issues related to feasibility, reliability, maintainability, accuracy, and safety that had the potential to delay implementation of the specified monitoring systems. Due to these known issues, the AQMD Governing Board adopted a resolution directing AQMD staff to work with the Western States Petroleum Association and its refiner members to resolve outstanding issues. Pilot projects for the development of TSC and HHV analyzers were completed in March 2008. Based on a determination that the pilot analyzers demonstrated compliance with the technical requirements of Rule 1118, the AQMD approved the TSC and HHV analyzers on May 20, 2008. Under the variances issued by the Hearing Board, the refineries have until September 1, 2008, to complete the design, acquisition, and installation of the required analyzers.

According to Ultramar, the September 1, 2008 variance deadline is not likely to be met by the refineries because the analyzer approval was given later than expected. On March 27, 2008, the refiners submitted to the Hearing Board a written request for continuance of the April 22-24, 2008 hearing scheduled in their variance orders for consideration of petitions for modification/extension. The Hearing Board granted this request, and also continued the previously established April 8, 2008 date for filing of such petitions. The Hearing Board established a new filing date of June 27, 2008, and scheduled the hearing on the petitions for July 15, 16, and 17, 2008.

As required by Rule 3004(a)(10)(C), condition II.1 has been added to the affected equipment in section D and H of the permit requiring the operator to comply with all the conditions of the variance including the submittal of progress reports. A copy of each of the documents related to this regular variance is available on the internet under the AQMD's "Facility Information Detail" database (FIND, at [http://www.aqmd.gov/webappl/fim/prog/hbdisplay.aspx?fac\\_id=800026](http://www.aqmd.gov/webappl/fim/prog/hbdisplay.aspx?fac_id=800026)).

The issuance of the regular variance by the AQMD Hearing Board does not affect federal or citizen enforceability of the subject requirements.

#### Order(s) for Abatement

The refinery is not currently subject to any AQMD Orders for Abatement.

#### Notices to Comply and Notices of Violation

As noted, the refinery has been in continuous operation since 1969. Since that time, the refinery has been subject to both self-reporting requirements and AQMD inspections. Further information regarding the facility's compliance status is available on the internet under the AQMD's "Facility Information Detail" database (FIND, at [http://www.aqmd.gov/webappl/fim/prog/novnc.aspx?fac\\_id=800026](http://www.aqmd.gov/webappl/fim/prog/novnc.aspx?fac_id=800026)).

Likewise, the compliance documentation for Variances and Abatement Orders is also available on the internet under the AQMD's "Facility Information Detail" database (FIND, at [http://www.aqmd.gov/webappl/fim/prog/novnc.aspx?fac\\_id=800026](http://www.aqmd.gov/webappl/fim/prog/novnc.aspx?fac_id=800026)).

### **10. Compliance Certification**

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

### **11. Appendices**

In order to minimize printing, all of the following appendices are available on the AQMD website as shown below. In addition, they will be made available on CDs upon request. Please contact the AQMD contact person identified on the public notice for this facility or call Bhaskar Chandan at (909) 396-3902 for assistance in finding the information on the website or to obtain a copy of the CD.

- I. Technical Guidance Document For the Title V Permit Program (March 2005, Version 4.0) (<http://www.aqmd.gov/titlev/TGD.html>)
- II. Periodic Monitoring Guidance Documents
  - A. AQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997) (<http://www.aqmd.gov/titlev/pdf/PeriodicMonitoringGuidelines-97.pdf>)
  - B. CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999) (<http://www.arb.ca.gov/fcaa/tv/tvinfo/pmrec624.pdf>)
  - C. CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001) (<http://www.arb.ca.gov/fcaa/tv/tvinfo/pmrecoms.pdf>)
- III. Summary Report of Notice of Violations. Further information regarding the facility's compliance status is available on the internet under the AQMD's "Facility Information Detail" database (FIND, at [http://www.aqmd.gov/webappl/fim/prog/novnc.aspx?fac\\_id=800026](http://www.aqmd.gov/webappl/fim/prog/novnc.aspx?fac_id=800026)).
- IV. Variances and Abatement Orders. Further information regarding the facility's compliance status is available on the internet under the AQMD's "Facility Information Detail" database (FIND, at [http://www.aqmd.gov/webappl/fim/prog/hbdisplay.aspx?fac\\_id=800026](http://www.aqmd.gov/webappl/fim/prog/hbdisplay.aspx?fac_id=800026)).