

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 1
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

PERMITS TO OPERATE

COMPANY NAME BP West Coast Products LLC
BP Wilmington Calciner

MAILING ADDRESS P.O. Box 1028
Wilmington, CA 90748-1028

EQUIPMENT LOCATION 1175 Carrack Avenue
Wilmington, CA 90748

FACILITY ID 131249 (CYCLE 1)

CONTACT PERSON Gary Tietavainen
(562) 499-3206

PROPOSED CHANGES TO PERMITS:

Proposed additions are underlined and proposed deletions are shown as ~~strikeouts~~.

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
Process 1: CALCINED PETROLEUM COKE PRODUCTION					P13.1
System 4: PRODUCT HANDLING STORAGE AND LOADINGS					S7.1
CONVEYOR, BELT, C00011, COOLER DISCHARGING, CALCINED COKE A/N: 421466	D22	C70		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C00012, DEDUST MIXER BYPASS, CALCINED COKE A/N: 421466	D23	C70		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, C00013, COOLER BATCH DUMPING, CALCINED COKE A/N: 421466	D24	C70		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 2
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
CONVEYOR, SCREW, SC0012, MIXING, DEDUST CALCINED COKE A/N: 421466	D25	C70		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, SCREW, SC0013, MIXING, DEDUST CALCINED COKE A/N: 421466	D26	C70		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0014, TRANSFERRING AND CHARGING CALCINED COKE A/N: 421466	D27	C70		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0016, TRANSFERRING AND CHARGING CALCINED COKE A/N: 421466	D28	C70		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0017, TRANSFERRING AND DISCHARGING CALCINED COKE A/N: 421466	D29	C70		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0018A, SILO DISCHARGING, CALCINED COKE A/N: 421466	D30	C73		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0018B, SILO DISCHARGING, CALCINED COKE A/N: 421466	D31	C73		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 3
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
CONVEYOR, BELT, C0018C, SILO DISCHARGING, CALCINED COKE A/N: 421466	D32	C73		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0018D, SILO DISCHARGING, CALCINED COKE A/N: 421466	D33	C73		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
STORAGE SILO, SIL0001, CALCINED COKE, HEIGHT: 68 FT; DIAMETER: 71 FT 3 IN A/N: 421468	D34	C73		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
STORAGE SILO, SIL0002, CALCINED COKE, HEIGHT: 68 FT; DIAMETER: 71 FT 3 IN A/N: 421469	D35	C73		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
STORAGE SILO, SIL0003, CALCINED COKE, HEIGHT: 68 FT; DIAMETER: 71 FT 3 IN A/N: 421471	D36	C73		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
STORAGE SILO, SIL0004, CALCINED COKE, HEIGHT: 68 FT; DIAMETER: 71 FT 3 IN A/N: 421472	D37	C73		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
BUCKET ELEVATOR, BE0002, RECOVERED <u>RECLAIMED</u> CALCINED COKE A/N: 421475	D42	C73 C70		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 4
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
CONVEYOR, BELT, C0021, CALCINED COKE RECLAIMER A/N: 421475	D43	C76		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0022, CALCINED COKE RECLAIMER A/N: 421475	D44	C76		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0023, CALCINED COKE RECLAIMER A/N: 421475	D45	C76		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0024, CALCINED COKE RECLAIMER A/N: 421475	D74	C76		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0025, TRANSFERRING CALCINED COKE A/N: 421475	D46	C76		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0026, TRANSFERRING CALCINED COKE WITH A DISTRIBUTOR A/N: 421475	D47	C76		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
CONVEYOR, BELT, C0027, TRANSFERRING CALCINED COKE A/N: 421475	D50	C54 C77		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 5
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
BIN, SURGE, HOP0005, TRUCK LOADOUT, 19774 CU, FT.; WIDTH: 28 FT 6 IN; HEIGHT: 27 FT 1 IN; LENGTH: 40 FT 6 IN A/N: 421475	D55	C54 C77		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
BULK MATERIAL LOAD/UNLOAD STATION, SP0003, SP0004, SP0005, & SP0006, CALCINED COKE, TRUCK LOADING STATION, 4 TOTAL A/N: 421475	D56	C77		PM: (9) [RULE 405, 2-7-1986]	A63.2 C1.5 D323.2 E125.1
BIN, VIBRATING DISCHARGE, CALCINED COKE A/N: 420213	D110			PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
FEEDER, VIBRATING, CALCINED COKE A/N: 420213	D111			PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
BIN, SURGE, HOP0004, RAIL CAR LOADOUT, 13718 CU, FT.; WIDTH: 19 FT 4 IN; HEIGHT: 24 FT 3 IN; LENGTH: 40 FT A/N: 420213	D51	C54		PM: (9) [RULE 405, 2-7-1986]	A63.2 D323.2
BULK MATERIAL LOAD/UNLOAD STATION, SP0001 & SP0002, CALCINED COKE, RAIL CAR LOADING STATION, 2 TOTAL A/N: 420213	D52	C54		PM: (9) [RULE 405, 2-7-1986]	A63.2 C1.5 D323.2
<u>STORAGE SILO, NO. 5, CALCINED COKE EMERGENCY DUMP AREA, EQUIPPED WITH AN AUTOMATIC WATER SPRAY SYSTEM, WIDTH: 25 FT; HEIGHT: 16 FT 3 IN; LENGTH: 18 FT</u>	<u>D114</u>			<u>PM: (9) [RULE 405, 2-7-1986]</u>	<u>A63.2</u> <u>A103.1</u> <u>D323.2</u>

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 6
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
<u>A/N: 473170</u>					
<u>HOPPER, , XXC0001, PORTABLE, CALCINED COKE CLEANUP, PETROLEUM COKE, EQUIPPED WITH MANUALLY ACTIVATED WATER SPRINKLER SYSTEM</u> <u>A/N: 420214</u>	<u>D112</u>			PM: (9) [RULE 405, 2-7-1986]	<u>A63.2</u> <u>D323.2</u> <u>E193.1</u>
<u>CONVEYOR, XXC0001, CALCINED COKE CLEANUP, PETROLEUM COKE</u> <u>A/N: 420214</u>	<u>D113</u>			PM: (9) [RULE 405, 2-7-1986]	
System 5: DUST COLLECTION					
BAGHOUSE, BH0002, WHEELABRATOR, MODEL 108, WITH A 100 HP BLOWER, 6100 SQ. FT. FILTER AREA <u>A/N: 396588</u>	C70	D22 D23 D24 D25 D26 D27 D28 D29 <u>D42</u>		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]]	D12.1 D322.1 D381.2 E102.1 K67.2
BAGHOUSE, BH0009, MIKROPUL, CONSISTING OF TWO MODULES, EACH 1357 SQ. FT. FILTER AREA <u>A/N: 396588</u>	C73	D30 D31 D32 D33 D34 D35 D36 D37 <u>D42</u>		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]]	D12.1 D322.1 D381.2 E102.1 K67.2

(10) Please refer to Section J of the facility permit for NESHAP/MACT requirements.

**Please refer to Sections F and G of the facility permit for the monitoring, recordkeeping, and reporting requirements.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 7
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

CONDITIONS:

The operator shall comply with the terms and conditions which are set forth below:

PROCESS CONDITIONS

PROCESS CONDITION NO. P13.1

All devices under this process are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
PM	District Rule	1158

[RULE 1158, 6-11-1999]

[Processes subject to this condition: 1]

SYSTEM CONDITION S7.1

The following conditions shall apply to all coke handling and related devices from this system:

The operator shall regularly wash exterior conveyors and return belts, overhead structures and ground area down to the coke laden water return system to avoid accumulation of coke dust.

The operator shall clean the exterior of the vehicle (including the tires) hauling the construction spoils prior to leaving the working site.

The operator shall drive all outgoing petroleum coke trucks, whether filled or empty, through the truck wash system in order to thoroughly wash any residual coke off the exterior of the trucks.

[RULE 1158, 6-11-1999]

[Systems subject to this condition: Process 1, System 1, 4]

DEVICE CONDITIONS

A. Emission Limits

A63.2 The operator shall limit emissions from this equipment as follows:

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 8
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

<u>Contaminant</u>	<u>Emission</u>
Visible Emissions	Less than 10 Percent opacity

[RULE 1158, 7-11-2008]

[Devices subject to this condition : D1, D2, D3, D4, D5, D6, D7, D12, D13, D14, D15, D16, D17, D18, D22, D23, D24, D25, D26, D27, D28, D29, D30, D31, D32, D33, D34, D35, D36, D37, D38, D42, D43, D44, D45, D46, D47, D48, D49, D50, D51, D52, D55, D56, D74, D91, D110, D111, D112, D113, D114]

A103.1 The operator shall keep materials received sufficiently moist to prevent fugitive emissions:

[RULE 1158, 12-2-1983, 6-11-1999]

[Devices subject to this condition : D1, D2, D3, D4, D5, D6, D7, D64, D114]

B. Material/Fuel Type Limits

None

C. Throughput/Operating Limitation

C1.5 The operator shall limit the material processed to no more than 7200 ton(s) in any one day.

For the purpose of this condition, material processed shall be defined as calcined coke.

This limit shall be based on the total combined limit for equipment D52 and D56.

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : D52, D56]

D. Monitoring/Testing Requirements

D323.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 9
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

If any visible emission (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emissions and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2) Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)- Periodic Monitoring, 12-12-1997; RULE 401, 3-21984; RULE 401, 11-9-2001]

[Devices subject to this condition :D1, D2, D3, D4, D5, D6, D7, D9, D10, D12, D13, D14, D15, D16, D17, D18, D21, D22, D23, D24, D25, D26, D27, D28, D29, D30, D31, D32, D33, D34, D35, D36, D37, D38, D42, D43, D44, D45, D46, D47, D48, D49, D50, D51, D52, D55, D56, D60, D63, D64, D65, D74, D91, D110, D111, D112, D113, D114]

E. Equipment Operation/Construction Requirements

E125.1 The operator shall drive all the outgoing petroleum coke trucks, whether filled or empty, through the truck wash system in order to thoroughly wash any residual coke off the exterior of the trucks.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 10
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

[RULE 1158, 6-11-1999]

[Devices subject to this condition : D1, D56]

E193.1 The operator shall operate and maintain this equipment according to the following requirements:

The operator shall activate the water sprinkler system when the hopper is in operation.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Off set, 5-10-1996]

[Devices subject to this condition : D112]

H. Applicable Rules

None

K. Recordkeeping/Reporting

None

BACKGROUND

BP West Coast Products LLC, BP Wilmington, with Facility ID 131249 is both NO_x and SO_x RECLAIM Cycle 1 facility that also belongs to the Title V program. BP West Coast Products LLC, BP Wilmington, with Facility ID 131249 produces high quality, petroleum coke from green coke by heating it in a 120 MMBtu per hour rotary kiln and combusting the volatile hydrocarbons at its facility located at 1175 Carrack Avenue, Wilmington, CA 90748.

According to the New Source Review database, West Coast Products LLC, BP Wilmington, with Facility ID 131249 has a potential to emit 1920 lb per day of NO_x, 828 lb per day of CO, 674 lb per day of PM₁₀, 3144 lb per day of SO_x and 43 lb per day of ROG.

In 2006, BP West Coast Products LLC, BP Wilmington, with Facility ID 131249 reported 209.770 tons per year of NO_x, 167.980 tons per year of SO_x, 41.743 tons per year of total suspended particulate matter, 0.933 tons per year of CO and 5.185 tons per year of ROG.

BP West Coast Products LLC, BP Wilmington, with Facility ID 131249 submitted application no. 396619 on January 18, 2002 for an initial Title V facility permit. The initial Title V facility permit was approved effective October 3, 2008.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 11
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

The AQMD also received no comments on the draft initial Title V facility permit from the owner of the petroleum coke calcining facility during the 30-day public comment period (July 1, 2008 to July 31, 2008). However, on November 4, 2008, the facility filed a petition for appeal with the Hearing Board, Case No. 5357-52 on the initial Title V facility permit issued on October 3, 2008.

BP West Coast Products LLC, BP Wilmington, with Facility ID 131249 submitted application no. 496111 on 2-13-2009 for administrative revision of the initial Title V facility permit issued on October 3, 2008. Application no. 496111 for the revised Title V facility permit was approved on October 29, 2009 and the revised Title V facility permit was issued to BP Wilmington Calciner.

BP West Coast Products LLC, BP Wilmington, with Facility ID 131249 submitted application no. 420214 on September 19, 2003 to add existing portable calcined coke cleanup hopper and a portable calcined coke cleanup conveyor operating without permits from SCAQMD to System 4 for Product Handling, Storage and Loading System of Process 1 for Calcined Petroleum Coke Production of the Facility Permit. The calcined coke cleanup hopper and the calcined coke cleanup conveyor started operating at the facility since 1983 and did not require installation because they are portable equipment. Currently, the hopper is equipped with a water sprinkler system fixed along its rim to control PM and PM₁₀ emissions. This water spray system is manually activated when the hopper is used.

Application no. 421477 was submitted by BP West Coast Products LLC, BP Wilmington on October 29, 2003 for administrative change of conditions of System 4 for Product Handling, Storage and Loading System of Process 1 for Calcined Petroleum Coke Production of the Facility Permit by the addition of an existing open emergency dump area, silo no. 5 and a portable receiving hopper/transfer station. Because this application was not submitted for existing equipment operating without permits from SCAQMD, it is superseded by A/N 473170.

BP West Coast Products LLC, BP Wilmington, with Facility ID 131249 submitted application no. 473170 on August 14, 2007 as a Class 3 application to add an existing open emergency dump area, silo no. 5 to System 4 for Product Handling, Storage and Loading System of Process 1 for Calcined Petroleum Coke Production. The silo no. 5 area is an outdoor hot coke collection and containment area with walls on three sides and a water spray system along the top perimeter of the wall which activates when hot coke enters. Silo no. 5 and the portable hopper are existing sources and were part of the original facility that commenced operations in 1982. When the calcining facility was originally constructed, what is currently called silo no. 5 was a single wall with a belt conveyor system, collectively termed the cooler batch dumping system. A correspondence to SCAQMD dated 7/17/1989 referenced application no. 131247 for the belt dumping, cooler batch dumping and

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 12
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

emergency outlet and described the system that was in place to divert coke that exceeded specified temperatures. This emergency dump system was installed to protect the conveyor system within the facility. Emissions from this operation were not identified individually in the application documentation, but were considered as part of the facility-wide PM emission sources.

The portable hopper was uncontrolled prior to the July 2008 Rule 1158 amendments. Currently, the hopper is equipped with a water sprinkler/misting system fixed along its rim to control PM and PM₁₀ emissions. This water spray system is manually activated when the hopper is used.

Application no. 473171 was submitted on August 14, 2007 for RECLAIM Facility Permit amendment but BP Wilmington Calciner was already issued an initial Title V Facility Permit effective October 3, 2008. Therefore, A/N 473171 will be processed as a RECLAIM/Title V De Minimis Significant Permit Revision with higher fees than for RECLAIM Facility Permit amendment since the facility belongs to the RECLAIM and Title V program. The proposed revision is considered as a De Minimis Significant Title V permit revision since net PM₁₀ emissions of 0.00084 lb per day result from this project. As a De Minimis Significant Title V permit revision, this project will be subject to a 45-day review period by EPA before a final permit is issued.

COMPLIANCE RECORD REVIEW

A search of the AQMD Compliance Database shows that there was one Notice of Violation No. P43492, issued on June 27, 2006 for failure to submit accurate quarterly certificate of emission reports for the second/third quarters of 2005. Otherwise, there are currently no other outstanding compliance issues concerning the facility.

PROCESS DESCRIPTION

BP West Coast Products LLC, BP Wilmington, with Facility ID 131249 produces high quality, petroleum coke from green coke by heating it in a 120 MMBtu per hour rotary kiln and combusting the volatile hydrocarbons at its facility located at 1175 Carrack Avenue, Wilmington, CA 90748. Waste heat is recovered as high pressure steam which can be used for electrical power generation.

Green petroleum coke, which is manufactured at the BP Los Angeles Refinery, is fed to the rotary kiln (13.5 feet internal diameter x 270 feet in length). The kiln includes a combination burner capable of firing natural gas and diesel oil which is rated at a maximum capacity of 120 MMBtu per hour. An oxygen injection system is used to increase the efficiency of the kiln system.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 13
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

Gases from the kiln enter the pyroscrubber afterburner where most entrained particulate combusts or settles out. Residual organics and other combustible gases are oxidized in the chamber, which has a normal residence time of 10 seconds. Gases leave the pyroscrubber at a temperature of no less than 2200⁰F. During normal operation, the hot gases pass through the waste heat recovery boiler and air pollution control systems. The hot by-pass stack located at the exit of the pyroscrubber is for emergency use only to protect downstream equipment in case of a low water level in the steam drum, fan failure, or a boiler feed water pump failure.

Heat is recovered from the flue gas in a waste heat boiler. The boiler generates approximately 300,000 pounds of high pressure steam per hour, which in turn is used by a turbine generator to generate electricity.

The flue gas leaves the waste heat boiler at a temperature of 450⁰F and enters a spray dryer reactor (30 feet in diameter by 55 feet high). A lime slurry is introduced through an atomizer which generates liquid droplets. These droplets react with the sulfur oxides in the flue gas to form calcium sulfates and sulfites. The gas leaves the spray dryer at about 210⁰F and enters a baghouse. The baghouse consists of twelve modules, each contains 168 teflon-coated fiberglass bags, 8 inches in diameter by 26 feet in length.

The flue gas is drawn through the baghouse by an induced draft fan and discharged to the atmosphere through a stack with an internal diameter of 104 inches and a height from flow disturbances of 85 feet.

Calcined coke exiting the kiln and cooler is normally transferred into product storage silos using a series of conveyors. Occasionally, calcined coke exiting the kiln and cooler is diverted to silo 5 due to unacceptably high coke temperatures. Coke with temperature greater than 130⁰F can ruin conveyor belts. Silo 5 is a three sided open containment area with metal walls and concrete floor that is located outside and near the kiln. Water sprinklers mounted on the top edges of silo 5 turn on automatically when coke is diverted to silo 5, this minimizing any coke dust emissions. In compliance with Rule 1158, coke is removed from silo 5 within 48 hours of the diversion, and a written record of all open-pile coke storage incidents is maintained.

Once the coke cools, a front loader is used to transfer moistened, calcined coke from silo 5 to the portable cleanup hopper. The portable cleanup hopper transfers the moistened coke onto the attached cleanup conveyor. The cleanup conveyor enables the moistened coke to be returned onto stationary conveyor-14 where it is combined with other calcined coke that is being transported to product storage silos. Silo 5 and the portable cleanup hopper and conveyor must be used sequentially and are never used independently.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 14
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

The moisture content of calcined coke must not exceed 0.5%. The abated hot coke in the silo no. 5 area has a high moisture content because hot coke entering the area is automatically wetted by the water spray system. This moistened coke is returned to the process in a controlled manner to ensure that the calcined coke product meets the maximum moisture content of 0.5%. The portable hopper is adjacent to the silo no. 5 area. A front end loader is used to transfer loads of abated hot coke from the silo no. 5 area to the portable hopper, which returns the abated hot coke to the process. The silo no. 5 area is currently covered with a temporary tarp to create an area with a temporary roof as well as 3 walls. The existing silo no. 5 area is equipped with a water spray system, which pre-existed the July 2008 rule amendment and meets the control requirements of the amended Rule 1158.

The portable hopper was uncontrolled prior to the July 2008 Rule 1158 amendments. Currently, the hopper is equipped with a water sprinkler system fixed along its rim to control PM and PM₁₀ emissions. This water spray system is manually activated when the hopper is used.

EMISSIONS CALCULATIONS

1. Application No. 420214 - Modification of Process 1, System 4 for Product Handling, Storage and Loading System

Application no. 420214 was submitted to add existing portable calcined coke cleanup hopper and a portable calcined coke cleanup conveyor to System 4 for Product Handling, Storage and Loading System for Process 1 for Calcined Petroleum Coke Production of the Facility Permit. Occasionally, calcined coke exiting the kiln and cooler is diverted to silo 5 due to unacceptably high coke temperatures. Coke with temperature greater than 130⁰F can ruin conveyor belts. Silo 5 is a three sided open containment area with metal walls and concrete floor that is located outside and near the kiln. Water sprinklers mounted on the top edges of silo 5 turn on automatically when coke is diverted to silo 5, this minimizing any coke dust emissions. Once the coke cools, a front loader is used to transfer moistened, calcined coke from silo 5 to the portable cleanup hopper. The portable cleanup hopper transfers the moistened coke onto the attached cleanup conveyor. The cleanup conveyor enables the moistened coke to be returned onto stationary conveyor-14 where it is combined with other calcined coke that is being transported to product storage silos. Silo 5 and the portable cleanup hopper and conveyor must be used sequentially and are never used independently.

Maximum amount of hot coke diverted to silo no. 5 = 11.7 tons per event
= 11.7 tons per hour = 11.7 tons per day = 23.3 tons per month = 280 tons per year.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 15
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

Maximum amount of calcined coke processed by the portable coke cleanup hopper and the portable coke cleanup conveyor = Maximum amount of hot coke diverted to silo no. 5
= 11.7 tons per event = 11.7 tons per hour = 11.7 tons per day = 23.3 tons per month
= 280 tons per year.

Controlled PM₁₀ emission factor for coke transfer emissions estimated by AP-42 13.2.4.3
Equation 1 = EF in lb PM₁₀ per ton = k (0.0032) (U/5)^{1.3} / (M/2)^{1.4} (100 – Eff)/100 where

k = particle size multiplier, dimensionless, = 0.35

U = mean wind speed, mph = 6.4

M = material moisture content, % = 9.3

Eff = Control efficiency, % = 80 from Rule 1158 Staff Report, 3/12/99, Table 4-2 – Water Spraying during loading/unloading

EF in lb PM₁₀ per ton = 0.35 (0.0032) (6.4/5)^{1.3} / (9.3/2)^{1.4} (100 – 80)/100 = 0.0000359

Controlled emissions of PM₁₀ from the diversion operation of the portable coke cleanup hopper and the portable coke cleanup conveyor = (0.0000359 lb per ton) (11.7 tons per hour)
= 0.00042 lb per hour = 0.00042 lb per day = 0.01005 lb per year

Uncontrolled emissions of PM₁₀ from the operation of the portable coke cleanup hopper and the portable coke cleanup conveyor = 0.00042 lb per hour / 0.20 = 0.0021 lb per hour
= 0.0021 lb per day = 0.05026 lb per year

Emissions of PM₁₀ from the operation of silo no. 5 and the portable receiving hopper and conveyor are controlled by water spray systems resulting in net PM₁₀ emissions of less than 1 lb per day .

PM₁₀ control efficiency of the water spray system = 80%

Offsets are not required for the emission increase of 0.00042 lb per day of PM₁₀ from the operation of the portable coke cleanup hopper and the portable coke cleanup conveyor due to the diversion of hot calcined coke to silo 5.

Process weight for portable coke cleanup hopper and conveyor = 11.7 tons per hour
= 23,400 lbs per hour

Maximum allowable emissions of PM₁₀ corresponding to a process weight of 23,400 lbs per hour according to Rule 405 = 12.5 lbs per hour

Controlled maximum emissions of 0.00042 lb per hour < Maximum allowable PM₁₀ emissions of 12.5 lb per hour specified by Rule 405.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 16
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

Therefore, operation of portable coke cleanup hopper and conveyor when equipped with water spray is expected to comply with Rule 405.

2. Application No. 421477 - Modification of Process 1, System 4 for Product Handling, Storage and Loading System

Application no. 421477 will have to be cancelled because A/N 421477 was submitted for administrative change of conditions for the open emergency dump area and portable receiving hopper and conveyor and was not submitted for existing equipment operating without permits from SCAQMD. A/N 473170 will be used instead to issue permits to operate for the existing open emergency dump area identified as silo 5.

3. Application No. 473170 - Modification of Process 1, System 4 for Product Handling, Storage and Loading System

Application no. 473170 was submitted on August 14, 2007 to add an existing emergency dump area identified as silo no. 5 operating without permit from SCAQMD to System 4 for Product Handling, Storage and Loading System of Process 1 for Calcined Petroleum Coke Production. The silo no. 5 area is an outdoor hot coke collection and containment area with walls on three sides. A water spray system along the top perimeter of the wall activates when hot coke enters. The portable hopper is adjacent to the silo no. 5 area. A front end loader is used to transfer loads of abated hot coke from the silo no. 5 area to the portable hopper, which returns the abated hot coke to the process. The silo no. 5 area is currently covered with a temporary tarp to create an area with a temporary roof as well as 3 walls. The existing silo no. 5 area is equipped with a water spray system, which pre-existed the July 2008 rule amendment and meets the control requirements of the amended Rule 1158. Emissions of PM and PM₁₀ from the operation of silo no. 5 and the portable receiving hopper/transfer station are controlled by water spray systems resulting in net PM₁₀ emissions of less than 0.50 lb per day. Therefore, no offsets shall be required for emissions from the operation of silo no. 5 and the portable receiving hopper and conveyor..

Condition C1.8 for the 120 MMBtu per hour rotary kiln specifies that the operator shall limit the green coke processed to no more than 2400 tons in any one day. The maximum production rate of calcined coke corresponding to the maximum feed rate of green coke is approximately 1,680 tons/day. This maximum production rate is based on historic process data, which consistently shows a 70% conversion rate of green coke into calcined coke.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 17
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

The maximum weight of calcined coke diverted to silo no. 5 can be calculated based on the following conservative assumptions:

1. During each hot coke diversion event, the rotary kiln produces calcined coke at its maximum daily production rate of 1,680 tons per day.
2. Two hot coke diversion events occur each month.
3. Each hot coke diversion event lasts approximately 10 minutes.

Based on these assumptions, the maximum amount of hot coke diverted to silo no. 5 is approximately 11.7 tons per event, which translates to 11.7 tons per hour, 11.7 tons per day, 23.3 tons per month, and 280 tons per year.

The frequency of hot coke diversion events to silo 5 is random and unpredictable and depends on many factors such as the quality of the incoming green coke feed. In addition, some diversion events are not due to excessive coke temperature but other issues such as downstream equipment breakdowns.

Silo 5 has a volume of 4,320 cubic feet and a capacity of 125 tons.

Maximum amount of hot coke diverted to silo no. 5 = 11.7 tons per event
= 11.7 tons per hour = 11.7 tons per day = 23.3 tons per month = 280 tons per year.

Controlled PM₁₀ emission factor for coke transfer emissions estimated by AP-42 13.2.4.3
Equation 1 = EF in lb PM₁₀ per ton = k (0.0032) (U/5)^{1.3} / (M/2)^{1.4} (100 – Eff)/100 where

k = particle size multiplier, dimensionless, = 0.35

U = mean wind speed, mph = 6.4

M = material moisture content, % = 9.3

Eff = Control efficiency, % = 80 from Rule 1158 Staff Report, 3/12/99, Table 4-2 – Water Spraying during loading/unloading

EF in lb PM₁₀ per ton = 0.35 (0.0032) (6.4/5)^{1.3} / (9.3/2)^{1.4} (100 – 80)/100 = 0.0000359

Controlled emissions of PM₁₀ from the diversion of hot calcined coke to silo 5
= (0.0000359 lb per ton) (11.7 tons per hour)
= 0.00042 lb per hour = 0.00042 lb per day = 0.01005 lb per year

Uncontrolled emissions of PM₁₀ from the diversion of hot calcined coke to silo 5
= 0.00042 lb per hour / 0.20 = 0.0021 lb per hour
= 0.0021 lb per day = 0.05026 lb per year

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 18
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

Emissions of PM₁₀ from the diversion of hot calcined coke to silo 5 and the operation of the portable receiving hopper and conveyor are controlled by water spray systems resulting in net PM₁₀ emissions of less than 1 lb per day .

PM₁₀ control efficiency of the water spray system = 80%

Offsets are not required for the emission increase of 0.00042 lb per day of PM₁₀ from the from the diversion of hot calcined coke to silo 5.

Process weight for storage silo no. 5 = 11.7 tons per hour = 23,400 lbs per hour

Maximum allowable emissions of PM₁₀ corresponding to a process weight of 23,400 lbs per hour according to Rule 405 = 12.5 lbs per hour

Controlled maximum emissions of 0.00042 lb per hour < Maximum allowable PM₁₀ emissions of 12.5 lb per hour specified by Rule 405.

Therefore, operation of storage silo no. 5 when equipped with water spray is expected to comply with Rule 405.

4. Application No. 473171 - Modification of Process 1, System 4 for Product Handling, Storage and Loading System

Application no. 473171 was submitted on August 14, 2007 for RECLAIM Facility Permit amendment but BP Wilmington Calciner was already issued an initial Title V Facility Permit effective October 3, 2008. BP West Coast Products LLC, BP Wilmington, with Facility ID 131249 filed a petition for appeal with the Hearing Board, Case No. 5357-52 on November 4, 2008 on the initial Title V facility permit issued on October 3, 2008 and submitted application no. 496111 on 2-23-2009 for administrative revision to update equipment description and some permit conditions of the initial Title V facility permit issued on October 3, 2008. Application no. 496111 for the revised Title V facility permit was approved on October 29, 2009 and the revised Title V Facility Permit issued to BP Wilmington Calciner.

A/N 473171 will be processed as a RECLAIM/Title V De Minimis Significant Permit Revision with higher fees than for RECLAIM Facility Permit amendment. The proposed permit will be submitted to EPA for a 45-day review period upon completion of AQMD's evaluation before a final permit is issued. EPA will comment and submit recommendations to AQMD during the 45-day period.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 19
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

FEE SUMMARY:

The fees paid for these applications are shown in Table 1 below:

Table 1 – Fee Summary

A/N	Equipment	Type	Fee Sch.	Fee Required	Fee Paid
420214	Petroleum Coke Cleanup Hopper and Conveyor	30	B	\$2,117.96	\$2,117.96
421477	Storage Silo No. 5 and Portable Receiving Hopper/Transfer Station	63	B	\$123.02	\$123.02
473170	Storage Silo No. 5 and Portable Receiving Hopper/Transfer Station	30	C	\$4,424.88	\$4,424.88
473171	Title V/RECLAIM Facility Permit Revision	76	C	\$2,232.96	\$2,232.96
Total				\$8,898.82	\$8,898.82

RULE EVALUATION:

PART I SCAQMD REGULATIONS

Rule 212
11/14/97

Standards for Approving Permits and Issuing Public Notices

Rule 212 requires public notice for the construction of a new source at a facility if 1) it is located within 1000 feet of a school; 2) any emission increase exceeds the daily maximums as specified in subsection (g) of this rule; or 3) any emission increase in toxic air contaminants for which a person may be exposed to a Maximum Individual Cancer Risk (MICR) of 1 in a million or greater . A public notice is not required here because the source is not located within 1000 feet of a school. Furthermore, emission increase of 0.0.00042 lb per day of PM₁₀ results from the addition of silo 5 and also from the addition of portable coke cleanup hopper and conveyor to the Title V Facility Permit.

Rule 402
05/07/76

Nuisance

This rule prohibits the discharge of air contaminants that cause injury, detriment, nuisance, or annoyance to a considerable number of persons; endanger the comfort, health or safety of any person; or cause injury to property. Operation of storage silo no. 5 and the portable calcined coke cleanup hopper and conveyor with water spray systems are not expected to

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 20
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

cause nuisance complaints under normal operation. No nuisance complaints have been issued for the equipment which have been operating without permits from SCAQMD. Thus, compliance has been expected.

Rule 403

06/03/05

Fugitive Dust

Fugitive dust is not expected as a result of this project to add existing silo 5 emergency dump area and the portable receiving hopper and conveyor operating without permits from SCAQMD to the Title V Facility Permit. The proposed project was an air pollution control project that improved the control of potential fugitive dust emissions since emissions of particulate matter are controlled by water spray systems.

Rule 405

02/07/86

Solid Particulate Matter - Weight

This rule prohibits the discharge of solid particulate matter in excess of the maximum emission rate allowed for solid particulate matter shown in Table 405(a). The silo 5 emergency dump area and the portable cleanup hopper and conveyor are subject to Rule 405. Operation of silo 5 emergency dump area and the portable receiving hopper and conveyor will continue to comply with the provisions of this rule since emissions of particulate matter are controlled by water spray systems.

Rule 1158

07/11/2008

Storage, Handling, and Transport of Coke, Coal and Sulfur

Operation of the petroleum coke calcining facility is subject to, and complies with Rule 1158. Rule 1158(d)(10) specifies several options for controlling PM emissions at "transfer points" including a total enclosure and a water spray system. As the coke drops (1) from the conversion conveyor 13 (D24) to the silo 5 area, and 2) from the front end loader into the portable cleanup hopper, BP currently complies with provision (d)(10) using water spray systems. Operation of silo 5 emergency dump area and the portable receiving hopper and conveyor will continue to comply with the provisions of this rule since emissions of particulate matter are controlled by water spray systems.

Reg. XIII

12/06/02

New Source Review for VOC, CO, PM₁₀, and NH₃ Emissions

This rule applies to new, modified, or relocated sources that increase emissions of any nonattainment air contaminants, ammonia, or ozone-depleting compounds. Modification of System 4 for Product Handling, Storage and Loading of Process 1 for Calcined Petroleum Coke Production by the addition of storage silo no. 5 and existing portable coke cleanup hopper and conveyor with water spray systems results in an emission increase of 0.00042 lb per day of PM₁₀ for the product handling, storage and loading

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 21
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

system. The water spray systems qualify as BACT for emission control of PM₁₀ from the operation of storage silo no. 5 and the portable coke cleanup hopper and conveyor. Emissions of PM and PM₁₀ from the operation of silo no. 5 and the portable receiving hopper and conveyor are controlled by water spray systems. Because emission increase of PM₁₀ is less than 0.50 lb per day from the operation of existing storage silo no. 5 and existing portable coke cleanup hopper and conveyor, offsets for PM₁₀ are not required.

Reg. XIV
03/04/05

Toxics

Rule 1401 New Source Review of Toxic Air Contaminants

There will be no increase in toxic air contaminants from the modifications of System 4 for Product Handling, Storage and Loading System of Process 1 for Calcined Petroleum Coke Production to add existing storage silo no. 5 and existing portable coke cleanup hopper and conveyor. These modifications are expected to result in emission increase of 0.00084 lb per day of PM₁₀ because storage silo no. 5 is equipped with an automatic water spray system and the portable receiving hopper is now equipped with a manually activated water sprinkler/ misting system along its rim after the July 2008 amendments of Rule 2008 to further control PM and PM₁₀ emissions. Because there is no increase in emission of toxic contaminants due to these modifications, a health risk assessment is not required. Compliance with this rule is expected.

Reg. XX
05/06/05

Regional Clean Air Incentives Market (RECLAIM)

BP West Coast Products LLC, BP Carson Refinery with Facility ID 131003 is both NO_x and SO_x Cycle II RECLAIM facility. It is therefore subject to Reg XX. However, RECLAIM does not apply to the existing storage silo no. 5 and the portable coke cleanup hopper and conveyor since there are no emissions of NO_x and SO_x from the operation of these equipment.

Reg. XXX
11/14/97

Title V Permits

The Title V Permit System is implemented in accordance with Title V of the 1990 BP West Coast Products LLC, BP Wilmington, with Facility ID 131249 submitted application no. 496111 on 2-13-2009 for administrative revision of the initial Title V facility permit issued on October 3, 2008. Application no. 496111 for the revised Title V facility permit was approved and the revised Title V facility permit was issued to BP Wilmington Calciner.

Application no. 473171 was submitted on August 14, 2007 for RECLAIM Facility Permit amendment to update the Facility Permit and to include existing storage silo no. 5 and portable coke cleanup hopper and conveyor operating without permits from SCAQMD. However, BP Wilmington

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 22	PAGE 22
	APPL. NOS. 420214, 421477, 473170, 473171	DATE 03/02/2010
	PROCESSED BY Belinda C.. Wan	CHECKED BY

Calcliner was already issued an initial Title V Facility Permit effective October 3, 2008. Addition of existing storage silo no. 5 and portable coke cleanup hopper and conveyor to the Title V Facility Permit is expected to result in emission increase of 0.00084 lb per day of PM₁₀ because storage silo no. 5 is equipped with an automatic water spray system and the portable receiving hopper is now equipped with a manually activated water sprinkler/ misting system along its rim after the July 2008 amendments of Rule 2008 to further control PM and PM₁₀ emissions. Therefore, A/N 473171 will be processed as a RECLAIM/Title V De Minimis Significant Permit Revision with higher fees than for RECLAIM Facility Permit amendment. The proposed permit will be submitted to EPA for a 45-day review period before a final permit is issued.

PART II STATE REGULATIONS

CEQA California Environmental Quality Act

CEQA requires that the environmental impacts of proposed projects be evaluated and that feasible methods to reduce, avoid, or eliminate identified significant adverse impacts of these projects be considered.

Because these applications are for modifications of System 4 for Product Handling, Storage and Loading System of Process 1 for Calcined Petroleum Coke Production to add existing storage silo no. 5 and portable coke cleanup hopper and conveyor that were not included in the Title V Facility Permit, no further CEQA review is required.

PART III FEDERAL REGULATIONS

CONCLUSION:

Based on the evaluation above, addition of existing storage silo no. 5 and portable coke cleanup hopper and conveyor to the Title V Facility Permit, is expected to comply with AQMD, State, and Federal Rules and Regulations. Permits to Operate are recommended with the conditions listed in the Conditions Section of this evaluation. Emissions of PM and PM₁₀ from the operation of silo no. 5 and the receiving hopper and conveyor are controlled by water spray systems.