

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	APPL. NO. 526347	DATE 11/1/11	PAGE 2 of 14
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The operator shall keep all spent filters in a tightly covered container which shall remain closed at all times until removal and transport to a hazardous waste landfill.

The operator shall maintain records in a manner approved by the District to demonstrate compliance with the requirements specified under this condition.

[Rule 1303(b)(2)-Offset, 5-10-1996; Rule 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition: Dx1]

H23.x This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1173

This equipment is subject to the heavy liquid fugitive components limit of 100 ppm.

[RULE 1173, 5-13-1994; RULE 1173, 2-6-2009]

[Devices subject to this condition: Dx2]

BACKGROUND

Paramount Petroleum Corporation (Paramount) operates a petroleum refinery located at 14700 Downey Avenue in the city of Paramount in the southern portion of Los Angeles County. Paramount processes crude oil into marketable products including gasoline, diesel fuel, jet fuel and other products. Emission sources at the refinery include combustion sources (heaters, boilers, and IC engines), fugitive components pumps, valves, flanges, compressors, drains, etc.), cooling towers, storage tanks, flares and loading/unloading facilities. The South Coast Air Quality Management District (AQMD) identification number for the facility is 800183.

Paramount is proposing to install a new in-line distillate filter for shipments of finished jet, diesel or kerosene to or from Paramount's tank farm and third-party terminals. AQMD received the application package on August 25, 2011. Paramount submitted supplemental information from September 6, 2011 to October 10, 2011. Table 1 lists permit processing tracking information and fees. No additional fees are required for this permit application.

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Table 1: PERMIT ADMINISTRATION & APPLICATION TRACKING INFORMATION

<i>Application No.</i>	<i>526347</i>
Equipment Description	Distillate Filter
Date Received	8/25/2011
Deemed Complete Date	10/12/2011
Application Type	10: Permit to Construct
Application Status	20: Class I
Previous Application No.	N/A
B-CAT No.	299950, Schedule B
C-CAT No.	00
Schedule B Fee	\$2,123.92
Expedited Fee	\$ 1061.96
Title V Revision Fee (<i>A/N 526484</i>)	\$ 1,747.19
Total Fees Required	\$ 4,933.07
Fees Submitted	\$ 4,933.07

COMPLIANCE RECORD REVIEW

A review of the AQMD Compliance Database showed 33 Notices of Violation (NOV) and Notices to Comply (NC) issued to Paramount in the past five years (10/01/06 - 10/31/11). All notices are either closed or in compliance status. The Stipulated Orders for Abatement (SOFA) are closed. Paramount is on a schedule to compliance on the Variance Cases.

PROCESS DESCRIPTION and EMISSIONS CALCULATION

Paramount proposes to install a filter that will be used to remove particulates from distillate for shipments of finished jet, diesel or kerosene to or from Paramount's tank farm and third party terminals. The distillate storage tanks can operate with or without the subject filter. The distillate filter is a self-contained vessel that may cause issuance of air contaminants during its operation and maintenance. It will be equipped with a pressure relief valve that will vent to a lower pressure tankage/process piping. VOC emissions are expected from the regular replacement of filter cartridges and from fugitive components.

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Emissions from Replacement of Filter Media

Description of Filter Cartridge Change-out

According to Paramount, during normal operation, filter cartridges may be changed up to twice per month. To do this, the filter housing is isolated by closing block valves upstream and downstream. A valve on the bottom of the filter housing is opened and the liquid in the vessel drained to an open topped half barrel. It must gravity drain into an open container because it does not have sufficient head to move directly into a storage tank or pressure vessel via hard pipe. When liquid drains into the barrel it is immediately removed using a vacuum truck. Once all liquid is drained from the vessel it can be opened and the cartridges replaced. The spent filters are removed and immediately placed in plastic bags, which are closed and then transferred to a closed-top bin for waste disposal.

Emissions from Opening the Filter Housing Vessel

The filter housing has an inside diameter of 26.5 inches, and an inside height of 88.25 inches. Although the housing is a pressure vessel, the volume will be calculated assuming it is a cylinder with constant cross sectional area over the entire height. This means that the volume calculated will be slightly larger than the actual volume.

It is assumed that the gas inside the vessel will be saturated in equilibrium with diesel fuel at ambient temperature. Based on the Material Safety Data Sheet submitted by Paramount, the vapor pressure of diesel fuel is 0.03 psia at 20°C.

$$\text{ppm VOC} = (0.03 \text{ psi} / 14.7 \text{ psi}) \times (1,000,000 \text{ ppm}) = 2,041 \text{ ppm}$$

$$\text{Total Volume of Vessel} = (26.5 \text{ in} / 2)^2 \times (\pi) \times (88.25 \text{ in}) \times (1 \text{ ft} / 12 \text{ in})^3 = 28.17 \text{ ft}^3$$

$$\text{Volume of VOC} = (28.17 \text{ ft}^3) \times (2,041 \text{ ppm} / 1,000,000 \text{ ppm}) = 0.0575 \text{ ft}^3$$

$$\text{Mass of VOC} = (0.0575 \text{ ft}^3) \times (1 \text{ lb-mole} / 379 \text{ ft}^3) \times (130 \text{ lbs/lb-mole}) = 0.02 \text{ lb}$$

The total mass of VOC emitted to the atmosphere for each change out from opening the vessel is 0.02 lb.

Emissions from Draining the Vessel

The volume of liquid drained from the vessel will be:

$$(28.17 \text{ ft}^3) \times (7.48 \text{ gallons/ft}^3) = 211 \text{ gallons}$$

Emissions from this operation are approximated assuming splash loading using the equation for rail car and tank truck loading, which is:

$$\text{Loading Losses, } L_L = 12.46 \text{ SPM/T, where}$$

loading losses are in lbs VOC/1,000 gallons loaded; S is a saturation factor, which is 1.45 for splash loading; P is the true vapor pressure of the liquid loaded in psia; M is the vapor molecular weight in lb/lb-

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mole; and T is the temperature in °R. VOC emissions for each 1000 gallons drained from the filter housing vessel are therefore:

$$L_L = (12.46) \times (1.45) \times (0.03 \text{ psia}) \times (130 \text{ lb/lb-mole}) / (528^\circ\text{R}) = 0.13 \text{ lb VOC/1000 gallons}$$

Since a maximum of 211 gallons are drained during each filter change operation, the mass of VOC (as Kerosene) emitted to the atmosphere from draining the vessel is:

$$(0.13 \text{ lb VOC/1000 gallons}) \times (211 \text{ gallons}) = 0.03 \text{ lb VOC/change}$$

30-Day Daily Average Emissions

Since the frequency of filter change may be twice per month, average daily emissions are:

$$(0.02 \text{ lb VOC/change} + 0.03 \text{ lb VOC/change}) \times (2 \text{ changes/month}) \times (1 \text{ month/30 days}) = 0.003 \text{ lb VOC/day, or}$$

0.00 lbs VOC/day

Fugitive Components

Paramount estimates that there will be nine (9) valves, six (6) sets of flanges, one (1) pressure relief valve and thirty six (36) others (connectors, etc) associated with this filter installation. Emissions from fugitive components are calculated using the CAPCOA-revised 1995 EPA Correlation Equations. (Table IV-3a from AQMD Guidelines for Fugitive Emissions Calculations, June 2003). Fugitive emissions are calculated as 0.28 lb/day VOC. Details on the component counts and associated emissions are provided in Table 2.

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**Table 2: FUGITIVE COMPONENTS COUNT AND EMISSIONS
FOR TANK FARM DISTILLATE FILTER, A/N 526347**

Source Unit		Service	No of Existing Components (1)	No. of New Components to be Installed (2)	Correlation Equation Factor, 100 ppm Screening Value (lbs/year)	Pre-Mod Emissions (lbs/year)	Post-Mod Emissions (lbs/year)
Valves	Sealed Bellows	All					
	SCAQMD Approved I & M Program	Gas / Vapor					
		Light Liquid (3)					
		Heavy Liquid (4)		14	1.37		19.13
Pumps	Sealless Type	Light Liquid (3)					
	Double Mechanical Seals or Equivalent Seals	Light Liquid (3)					
	Single Mechanical Seals	Heavy Liquid (4)					
Compressors		Gas / Vapor					
Flanges (ANSI 16.5-1988)		All		9	2.24		20.20
Connectors		All		50	0.88		43.76
Pressure Relief Valves		All		1	3.23		3.23
Process Drains with P-Trap or Seal Pot		All					
Other (including fittings, hatches, sight-glasses, and meters)		All		5	3.23		16.17
Total Emissions (lbs/year)							102.49
Total Emissions (lbs/day)							0.28

- (1) Any component existing prior to the modification.
- (2) Any new component proposed to be installed due to the modification; this also includes new components to be installed to replace existing components.
- (3) Light liquid and gas/liquid streams: Liquid or gas/liquid stream with a vapor pressure greater than that of kerosene (>0.1 psia @ 100°F or 689 Pa @ 38°C), based on the most volatile class present at 20% by volume.
- (4) Heavy liquid: streams with a vapor pressure equal to or less than that of kerosene (<0.1 psia @ 100°F or 689 Pa @ 38°C), based on the most volatile class present at 20% by volume.

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The total emissions from this project are due to the fugitive components of 102.49 lbs/yr or 0.28 lb/day and filter replacement of 1.095 lbs/yr or 0.003 lb/day. This amount of emissions does not qualify as a significant increase but will be categorized as a de minimis increase.

RULES EVALUATION

PART 1: SCAQMD REGULATIONS

Rule 212 Standards for Approving and Issuing Public Notice (Amended Nov. 14, 1997)

- (a) The applicant is required to show that the equipment, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, is so designed, controlled, or equipped with such air pollution control equipment that it may be expected to operate without emitting air contaminants in violation of provisions of Division 26 of the State Health and Safety Code of these rules. The operation of the proposed project is expected to comply with this requirement.

- (c)(1) Public notification is required if any new or modified permit unit, source under Regulation XX, or equipment under Regulation XXX may emit air contaminants located within 1000 feet from the outer boundary of a school. ***As shown on the map provided by Paramount, the source is within 1000 feet of a school, public notification is therefore required under this section.*** Per R212(d), Paramount will be required to distribute public notice to the parents or legal guardians of children in any school within ¼ mile of the facility and to each address within a radius of 1000 feet from the outer property line of the proposed new or modified facility.

- (c)(2) Public notification is required if any new or modified facility has on-site increases exceeding any of the daily maximums specified in subdivision (g) of this rule. Since the increase in emissions does not exceed the daily maximum specified with the operation of the proposed project, public notification is therefore not required under this section.

- (c)(3) Public notification is required if the increase in maximum individual cancer risk (MICR), based on Rule 1401, exceeds one in a million (1×10^{-6}), due to a project's new construction or proposed modification. Since the increase in emissions does not result in MICR over the threshold, public notification is therefore not required under this section.

- (g) This subdivision sets forth the process for federal public notification and distribution and specifies the daily maximum emissions increase as follows:

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<u>Air Contaminant</u>	<u>Daily Maximum in lbs/day</u>
Volatile Organic Compounds	30
Nitrogen Oxides	40
PM10	30
Sulfur Dioxide	60
Carbon Monoxide	220
Lead	3

The increase in emissions does not exceed the daily maximum specified; federal public notification is therefore not required.

Rule 401 Visible Emissions (Amended November 9, 2001)
 Operation of this permit unit is not expected to result in visible emissions. Therefore, compliance with this rule is expected.

Rule 402 Nuisance (Adopted May 7, 1976)
 Operation of this permit unit is not expected to result in a public nuisance. Therefore, compliance with this rule is expected.

Reg IX Standards of Performance for New Stationary Sources (Amended March 5, 2010)

40 CFR 60 Subpart GGGa: Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006

§60.590a Applicability and designation of affected facility

This regulation is applicable to affected facilities in refineries that begin construction after November 7, 2006. The following are affected facilities under this subpart:

- Compressors
- The group of all equipment within a process unit

Owners and operators are not required to comply with the definition of “process unit” in §60.591a of this subpart until the EPA takes final action to require compliance and publishes a document in the Federal Register. As of November 1, 2011, the definition of “process unit” in §60.591a is stayed, thus the definition in §60.591a(e) is used. Process unit is defined as components assembled to produce intermediate or final products from petroleum, unfinished petroleum derivatives, or other intermediates; a process unit can operate independently if supplied with sufficient feed or raw materials and sufficient storage facilities for the product.

The new fugitive components being installed in the Distillate Filter are not subject to the requirements of this regulation, since the distillate filter is not considered a process unit as defined in this section.

Reg X National Emission Standards for Hazardous Air Pollutants (Amended April 4, 2008)
 There are currently no NESHAP standards that apply to the Distillate Filter as outlined in the District’s Regulation X.

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Rule 1173 Control of Volatile Organic Compound Leaks and Releases from Components at Petroleum Facilities and Chemical Plants (Amended 06/01/07)

The miscellaneous fugitive components of P9S1 are subject to Rule 1173 per Condition H23.1. The fugitive components will be subject to the leak, identification, operator inspection, maintenance and recordkeeping and reporting requirements. As required by Rule 1173(g)(1), any fugitive components associated with this filter with leaks greater than 100 ppm will be repaired, replaced or removed. Paramount shall include the new components into their Inspection and Maintenance (I &M) program for monitoring and repairing fugitive components. Compliance with this rule is expected.

Reg XIII New Source Review (NSR)

Rule 1303: Requirements (Amended Dec. 6, 2002)

1303(a) Best Available Control Technology (BACT)
 BACT is required for any increase in emissions that exceeds 1.0 lb/day on a maximum daily basis. Compliance with Rule 1173 is BACT for fugitive components for heavy liquid. As discussed in the Emissions Calculation Section of this evaluation, the increase in emissions from the distillate filter is less than 1.0 lb/day in fugitive emissions, therefore BACT is not triggered; nevertheless, Paramount will continue to comply with the requirements of Rule 1173. Compliance is expected.

1303(b) This subdivision lists the following requirements for a Permit to Construct for any new or modified source which results in a net emission increase of any non-attainment air contaminant at a facility.

1303(b)(1) Modeling
 According to Rule 1303 Appendix A, modeling for VOC is not required.

1303(b)(2) Emission Offsets
 Offsets are required according to District policy if project emission increases, including sum of all emission increases from all applications for that project are more than 0.5 lb/day for all non-attainment air contaminant and their precursors (excludes CO). As shown in Table 2, there is a 0.28 lb/day increase in VOC emissions from this project. Emission offset is not required.

1303(b)(3) Sensitive Zone Requirements
 Since Emission Reduction Credits were not required, this section does not apply.

1303(b)(4) Facility Compliance
 The facility is currently in compliance with all applicable rules and regulations of the District.

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- 1303(b)(5) Major Polluting Facilities
- (A) Alternative Analysis
 - (B) Statewide Compliance
 - (C) Protection of Visibility
 - (D) Compliance Through California Environmental Quality Act

This application is not considered a major modification according to the definition in R1302(r), since the increase in emissions is less than one lb/day. This section, therefore, does not apply

Reg XIV Toxics and Other Non-Criteria Pollutants

Rule 1401: New Source Review of Toxic Air Contaminants (Amended March 4, 2005)

This rule specifies limits for maximum individual cancer risk (MICR), cancer burden, and noncancer acute and chronic hazard index (HI) from new permit units, relocations or modifications to existing permit units which emit toxic air contaminants (TAC) listed in Table 1 of this rule.

Compliance to Rule 1401 is demonstrated by passing the requirement of Tier 1-Multiple Pollutant Screening Level Procedure. The District used the conservative nearest worker and residential receptor location of **25 meters** for analysis. As shown in the two tables below, neither the cumulative cancer/chronic hazard nor acute hazard index exceeds 1. MICRs, HICs and HIAs are therefore below Rule 1401 risk limits.

Table 3: ANALYSIS FOR CANCINOGENIC AND/OR CHRONIC COMPOUNDS

<i>A/N</i>	<i>Toxic Air Contaminant</i>	<i>Wt % (1)</i>	<i>VOC Increase/yr (2)</i>	<i>Qyear (3)</i>	<i>PSL (4)</i>	<i>PSI (5)</i>
JP-8	Benzene	0.04	103.57	0.04	1.14E+00	3.51E-02
	Toluene	0.06	103.57	0.06	9.92E+03	6.05E-06
	Xylene	0.04	103.57	0.04	2.31E+04	1.73E-06
	Ethyl Benzene	0.01	103.57	0.01	1.31E+01	7.63E-04
					Σ PSI	3.51E-02
Diesel	Benzene	0.03	103.57	0.03	1.14E+00	2.63E-02
	Toluene	0.03	103.57	0.03	9.92E+03	3.02E-06
	Xylene	0.02	103.57	0.02	2.31E+04	8.66E-07
	Ethyl Benzene	0.00	103.57	0.00	1.31E+01	0.00E-00
					Σ PSI	2.63E-02

- (1) Wt % was provided by Paramount
- (2) See Table 2 for total emissions, lbs/yr
- (3) Annual emissions of each TAC (Qyear), lbs/yr
- (4) Pollutant Screening Level (PSL), as contained in Table 1A of Attachment L, Risk Assessment Procedures, Version 7.0 (Revised September 10, 2010)

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(5) Pollutant Screening Index = Q/PSL

Table 4: ANALYSIS FOR ACUTE COMPOUNDS

<i>A/N</i>	<i>Toxic Air Contaminant</i>	<i>Wt % (1)</i>	<i>Total VOC Emissions/hr (2)</i>	<i>Q_{hr} (3)</i>	<i>PSL (4)</i>	<i>PSI (5)</i>
JP-8	Benzene	0.04	0.01	4.00E-06	7.39E-01	5.41E-06
	Toluene	0.06	0.01	6.00E-06	1.85E+01	3.24E-06
	Xylene	0.04	0.01	4.00E-06	1.10E+01	3.64E-06
					Σ PSI	1.23E-05
Diesel	Benzene	0.03	0.01	3.00E-06	7.39E-01	4.06E-06
	Toluene	0.03	0.01	3.00E-06	1.85E+01	1.62E-06
	Xylene	0.02	0.01	2.00E-06	1.10E+01	1.82E-06
					Σ PSI	7.5E-06

- (1) Wt % was provided by Paramount
- (2) See Table 2, lbs/hr
- (3) Total hourly emissions of each TAC (Q_{hour}), lbs/hr
- (4) Pollutant Screening Level (PSL), as contained in Table 1A of Attachment L, Risk Assessment Procedures, Version 7.0 (Revised September 10, 2010)
- (5) Pollutant Screening Index = Q/PSL

Both the cumulative cancer/chronic risk and cumulative acute risk indices are well below 1; therefore no further risk screening assessment is required. Further, based on Paramount's Tier 2 Screening Assessment, the MICR, HIC and HIA are below Rule 1401 risk limits.

- 1401(d)(1) **MICR and Cancer Burden**
 The cumulative increase in MICR shall not result in an increased MICR greater than one in one million, if the permit is constructed without T-BACT and greater than ten in one million if the permit unit is constructed with T-BACT. As shown in the Risk Assessment, MICR is very well below the specified limit.
- 1401(d)(2) **Chronic Hazard Index**
 The cumulative increase in total chronic HI for any target organ system shall not exceed 1.0 at any receptor location. As shown in the Risk Assessment, Table 3, chronic hazard index is very well below the specified limit.
- 1401(d)(3) **Acute Hazard Index**
 The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location. The total emissions shall be calculated according to 1401(f)(4) based on maximum hourly basis from permit conditions which directly limit the emissions. As shown in the Risk Assessment, Table 4, acute hazard index is very well below the specified limit.

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- 1401(d)(4) Risk Per Year
 The risk per year shall not exceed 1/70 of the maximum allowable risk specified in (d)(1)(A) or (d)(1)(B). Since the MICR is less than 1 in a million, the facility complies with this requirement.
- 1401(d)(5) Operating conditions imposed pursuant to Rule 1401, which prohibit or limit the use or emission of toxic air contaminants, shall apply only to those toxic air contaminants listed in the version of Rule 1401 applicable at the time the permit conditions were imposed. There is no permit conditions prohibiting or limiting the use of toxic air contaminants for the subject storage tanks.
- 1401(d)(6) Federal New Source Review for Toxics
 Section 112 of the federal Clean Air Act (CAA) defines major source as any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit considering controls, in the aggregate, 10 tons per year or more of any hazardous air pollutant (HAP) or 25 tons per year or more of any combination of hazardous air pollutants (HAPs). Since Paramount does not emit more than 10 tons annually of a listed HAP or more than 25 tons annually of a combination of HAPs, it is not subject to this requirement.

Reg XVII Prevention of Significant Deterioration (PSD)

This regulation sets forth preconstruction review requirements for stationary sources to ensure that air quality in clean air areas does not significantly deteriorate while maintaining a margin for future industrial growth.

The SCAQMD is presently considered in attainment for the following criteria pollutants: NO₂, SO₂, CO and Lead; thus these pollutants are subject to PSD regulations. The tank farm distillate filter will not emit these pollutants. Therefore, Reg XVII requirements do not apply to this new construction.

Reg XX Regional Clean Air Incentives Market (RECLAIM)

Paramount is a Cycle 1 NO_x and SO_x RECLAIM facility and therefore is subject to RECLAIM requirements. However, the subject equipment does not emit NO_x or SO_x and therefore RECLAIM requirements do not apply to this project.

Reg XXX Title V Permits

Rule 3001(a): Applicability (Amended November 14, 1997)

The Title V Permit system is the air pollution control permit system required to implement the federal Operating Permit Program as required by Title V of the federal Clean Air Act as amended in 1990. Paramount has been designated as a Phase One Title V facility. The final initial Title V permit under A/N 337522 was issued on February 27, 2009.

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Rule 3005: Permit Revisions (Amended March 16, 2001)

The permit for this project will be issued as a “de minimis significant permit revision” of the Title V permit as defined in Rule 3000(b)(6), because the cumulative emission increase is not greater than the following threshold:

<u>Air Contaminant</u>	<u>Daily Maximum in lbs/day</u>
HAP	30
Volatile Organic Compounds	30
Nitrogen Oxides	40
PM10	30
Sulfur Dioxide	60
Carbon Monoxide	220

The table below shows that the cumulative emission increase is not greater than the threshold; therefore the requirements of this rule have been met. The revision will be applicable to a 45-day EPA review.

Table 5: De Minimis Emissions Accumulation for Paramount Refinery
 (Initial Title V Issuance to Latest Revision, February 27, 2009-November 1, 2011)

<i>Air Contaminant</i>	<i>Current, lbs/day</i>	<i>Additional due to this project, lbs/day</i>	<i>Total, lbs/day</i>
HAP	0.00	0.00	0.00
VOC	0.42	0.28	0.70
NOx	0.59	0.00	0.59
PM10	0.02	0.00	0.02
SOx	0.03	0.00	0.03
CO	0.50	0.00	0.50

Rule 3006: Public Participation (Amended November 14, 1997)

Since the permit for this project will be issued as a “de minimis significant permit revision” of the Title V permit, it will not be subject to public notice requirements of this rule.

PART 2: STATE REGULATIONS

CEQA

California Environmental Quality Act (Amended 01/01/05)

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. The CEQA Applicability Form (400-CEQA) submitted by Paramount indicates that the project does not have any impacts which trigger the preparation of a CEQA document; therefore a CEQA analysis is not required.

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PART 3: FEDERAL REGULATIONS

40 CFR 60 Subpart GGGa: Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for which Construction, Reconstruction, or Modification commenced after November 7, 2006 (Amended March 4, 2011)
 This regulation is evaluated under District’s Reg IX above.

40 CFR 63 Subpart CC: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Petroleum Refineries
 Paramount has provided data to the District to show that Paramount Refinery is not a major HAP source which is defined as a source emitting 10 tons/year of any single HAP or 25 tons/year of all HAPs combined. Therefore, this subpart is not applicable because the refinery does not meet the criterion specified by paragraph (a)(1) of this section.

CONCLUSION AND RECOMMENDATION

Based on the above evaluation, the installation and operation of the tank farm distillate filter is expected to comply with all applicable District, State and Federal Rules and Regulations. Therefore, issuance of Permit to Construct is recommended.