



# South Coast Air Quality Management District

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

May 7, 2014  
via electronic submittal

Mr. Gerardo Rios  
Chief, Permits Office  
U.S. EPA, Region IX, Mail Stop AIR-3  
75 Hawthorne St.  
San Francisco, CA 94105

**Subject: Proposed De Minimis Significant Revision to Title V Facility Permit for Air Products & Chemicals, Inc., Wilmington Hydrogen Plant (Facility ID: 101656) - Expedited Review Request**

Dear Mr. Rios:

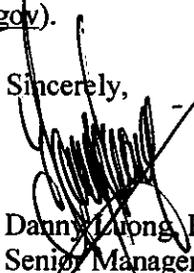
Enclosed for your review is the proposed De Minimis Significant revision of the Title V facility permit for the hydrogen plant of Air Products & Chemicals, Inc. located at 700 N. Henry Ford Ave., Wilmington, California.

Under this revision, the South Coast Air Quality Management District (SCAQMD) proposes to issue Permits to Construct (PC) under A/Ns 561635 and 561636 for the hydrogen plant and its flare, respectively. The issuance of the PCs will facilitate modifications to bring the facility into compliance with SCAQMD Rule 407. The revised portion of the permit (Section H) along with our evaluation report is attached for your review.

**In consideration of the upcoming hearing for the Regular Variance/AOC for Case No. 4276-14, scheduled for May 20, 2014, an expedited review (in lieu of 45 days) is requested by the SCAQMD on behalf of Air Products & Chemicals, Inc. (see attached letter from facility).**

This letter is being sent to you via email in order to facilitate your review. If you have any questions or wish to provide comments regarding the proposed permits, please contact permitting engineer, Mr. Thomas Lee at (909) 396-3138 ([tleel@aqmd.gov](mailto:tleel@aqmd.gov)).

Sincerely,



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

Enclosures

cc: Jim Reebe (AP Wilmington) – w/o enclosures  
Application File 561635, 561636

*"Cleaning the air that we breathe..."*



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**Air Products and Chemicals, Inc.**  
700 N. Henry Ford Avenue  
Wilmington, CA 90744  
Telephone (310) 952-9172

22 April 2014

**Mr. Danny Luong**  
**Senior Manager**  
**RECLAIM Administration, Refinery Permitting & Retail Gasoline Dispensing**  
**South Coast Air Quality Management District**  
**21865 Copley Drive**  
**Diamond Bar, CA 91765-4182**

**Subject: Air Products and Chemicals, Inc. Wilmington Hydrogen Plant (Facility ID # 101656)**  
**Request for EPA Expedited Review of A/Ns 561637, 561635 and 561636**

Dear Mr. Luong:

On behalf of Air Products and Chemicals, Inc. (Air Products) Wilmington Hydrogen Plant, I am writing to request that the South Coast Air Quality Management District (District) obtain expedited EPA review of A/Ns 561637, 561635 and 561636. These applications will allow for routing of an existing atmospheric vent source to the facility clean-service flare to achieve compliance with the CO concentration limit under Rule 407(a)(1), which is currently being exceeded per the interim variance and alternative operating conditions issued by the District's Hearing Board on February 20, 2014 (Case No. 4276-14). The proposed change will result in a reduction in VOC emissions of ~2 lbs/day and CO emissions of ~63 lbs/day. Once a permit-to-construct and the corresponding Title V Permit amendments are issued, the facility anticipates completing the proposed physical changes within 5-7 days. The interim variance remains valid through May 20, 2014. As discussed between counsel for Air Products and the District, Air Products hopes to obtain a final permit-to-construct and complete the proposed rerouting to the flare prior to expiration of the interim variance, which would eliminate non-compliance with Rule 407(a)(1) and thereby avoid the need for the Hearing Board to hold a hearing on Air Products' requested regular variance and alternative operating conditions. By allowing Air Products to complete the physical changes and achieve compliance before expiration of the interim variance, expedited review would therefore be in the best interest of the public/environment and would conserve the resources and time of both the Hearing Board and District staff. To facilitate this, we would kindly request that your office please request expedited EPA review (i.e., early termination of its 45-day review period) with respect to the applications indicated above.

Feel free to contact me at (714) 642-4252 or at reebeljc@airproducts.com if you require any additional information or have any questions regarding this request. Thank you.

Sincerely,



**Jim Reeber**  
**Sr. Environmental Engineer**

**c: Tom Lee – Air Quality Engineer**  
**Karin Manwaring – Senior Deputy District Counsel**  
**Chris McWilliams – Plant Manager**  
**Todd Solodar – APCI Corporate Counsel**  
**Kevin Poloncarz – Paul Hastings LLP**

**File: CA\Wilmington\SCAQMD Permitting**