



South Coast Air Quality Management District

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

July 1, 2010
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 BP West Coast Products LLC (Facility ID #131003)

Dear Gerardo:

Enclosed for your 45-day review is the proposed revision to the Title V facility permit for BP West Coast Products LLC (BP) located at 2350 E. 223rd Street, Carson, California. BP's initial Title V permit was issued September 1, 2009. The proposed revision is a De Minimis Significant Revision and a public notice is not required.

The South Coast Air Quality Management District (AQMD) has received applications for Permits to Construct from BP for the equipment described in table below. The AQMD has evaluated the applications and made a preliminary determination that the equipment will operate in compliance with all of the applicable requirements of our Rules and Regulations. The revised portions of the permit and our evaluation reports are attached for your review.

Application No.	Equipment	Application for
502189	Hydrocracker Unit (Reaction Section)	Modifications to an existing hydrocracker unit by routing five atmospheric safety valves and five new pressure relief devices to the Hydrocracker Flare System. Additionally, two pressure safety valves will be upgraded. Both of the valves are already connected to the hydrocracker flare. The objective of the project is to meet American Petroleum Institute (API) and BP recommended standards.
502190	Hydrocracker Unit (Fractionation Section)	Same as above.
502191	Hydrocracker Flare System	Modifications to an existing flare to connect new pressure relief devices and previously atmospheric pressure safety valves from the hydrocracker unit to the flare.
504383	Coker Gasoline Fractionation Unit	Modification to an existing coker fractionation unit by upgrading the dehexanizer feed surge drum (device D1981) with a new and larger vessel and venting the new drum to the No. 5 Flare System instead of to the atmosphere as currently permitted.

Application No.	Equipment	Application for
		The new surge drum is designed to improve feed rate control and eliminate atmospheric releases. In addition, the ammonia storage tank (device D1986) currently listed in this system will be moved to the storage tank system (process 16, system 1) for consistency.
504384	Refinery No. 5 Flare	Modification to an existing flare to allow the modified coker fractionation unit to vent the flare during emergency.

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 this project, please contact the processing engineers, Ms. Hanh Le, at (909) 396-2522 (hle@aqmd.gov) or Mr. Rafik Beshai, at (909) 396-3611 (rbeshai@aqmd.gov).

Sincerely,



Jay Chen
Senior AQ Engineering Manager
Refinery and Waste Management Permitting
Engineering and Compliance

Enclosures

cc w/o enclosures:

Eric Daley, Environmental Planning Supervisor
BP West Coast Products LLC