

**Minor Modification to a Covered Source**  
**Review Summary**

**Application File No.:** 0088-12 (Minor Modification)

**Permit No.:** 0088-01-C

**Applicant:** Chevron USA Products Company

**Facility Title:** Chevron Hawaii Refinery  
Located at 91-480 Malakole Street, Kapolei, Oahu

**Mailing Address:** Chevron USA Products Company  
Hawaii Refinery  
91-480 Malakole Street  
Kapolei, HI 96707

**Responsible Official:** Mr. Thomas M. Kovar  
Refinery Manager  
Ph. (808) 682-5711

**Point of Contact:** Ms. Helen Mary Wessel  
Environmental Specialist  
Ph. (808) 682-2282

**Application Date:** August 9, 2006

**Proposed Project:**

SICC 2911 (Petroleum Refining)

Petroleum storage tank no. 275 is an existing external floating roof tank with mechanical shoe primary seals. Chevron plans to construct a geodesic dome on tank no. 275 to act as weather barrier, improve product integrity, and decrease air pollutant emissions.

The Department previously determined that the construction of a geodesic dome on an external floating roof tank can be used to convert a tank into an internal floating roof tank to comply with the Refinery MACT requirements, therefore, Chevron chose to comply with the Refinery MACT requirements in this manner for tank no. 275. Secondary seals will not be required if the domed roof is installed. This application qualifies as a minor modification because this modification:

1. Does not increase the emissions of any pollutant above the permitted emission limits;
2. Does not result in the emission of any air pollutant not previously emitted;
3. Does not increase the emissions of any air pollutant identified in the application and not limited by the permit;
4. Does not violate any applicable requirement;
5. Does not involve significant changes to existing monitoring requirements or any relaxation or significant change to existing reporting or recordkeeping requirements in the permit.
6. Does not require or change a case-by-case determination of an emission limitation or other standard, a source-specific determination for temporary sources of ambient

- impacts, or a visibility or increment analysis;
7. Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement, and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject; and
  8. Are not modifications pursuant to any provision of Title I of the Act.

A permit modification application fee of \$200.00 was submitted by the applicant and processed.

**Equipment Description:**

Petroleum storage tank no. 275 is a 5,000 bbl external floating roof petroleum storage tank that will be converted to an internal floating roof petroleum storage tank.

**Applicable Requirements:**

This minor modification will not violate any applicable requirement including PSD requirements. All existing applicable requirements will continue to be met as stated in the covered source permit review for CSP 0088-01-C. The planned modification will not trigger the applicability of New Source Performance Standards (NSPS) under modification (no emission increases) or reconstruction (less than 50% of the new construction costs).

**Best Available Control Technology (BACT):**

A Best Available Control Technology (BACT) analysis is applicable only to new covered sources and significant modifications to covered sources that have the potential to emit or a net emissions increase above significant levels as defined in HAR §11-60.1-1. Since this is a minor modification, a BACT analysis is not applicable.

**Consolidated Emissions Reporting Rule (CERR):**

No change from Covered Source Permit 0088-01-C. This facility exceeds the Type A CER triggering levels. Therefore, this facility is subject to CER.

The Clean Air Branch also requests annual emissions reporting from those facilities that have facility-wide emissions of a single air pollutant exceeding in-house triggering levels. The emissions from this facility exceed the in-house triggering levels and thus annual emissions reporting is required for in-house recordkeeping purposes. In addition, annual emissions reporting is required since this is a covered source.

**Compliance Assurance Monitoring (CAM):**

No change from Covered Source Permit 0088-01-C. This facility is subject to CAM at first permit renewal.

**Synthetic Minor Source:**

No change from Covered Source Permit 0088-01-C. This facility is a major source, not a synthetic minor source.

**Insignificant Activities:**

No change from Covered Source Permit 0088-01-C.

**Alternate Operating Scenarios:**

No change from Covered Source Permit 0088-01-C. There are no alternate operating scenarios proposed for this facility.

**Project Emissions:**

<b>Equipment</b>	<b>Proposed Potential VOC Emissions (tpy)</b>	<b>Existing Potential VOC Emissions (tpy)</b>
Tank No. 275	1.0	11.8

**Ambient Air Quality Impact Assessment:**

An ambient air quality impact assessment is not required for minor modifications to covered sources since there are no emission increases. In addition, the only emissions are fugitive VOCs from the petroleum storage tank and any HAPs associated with these VOCs. An ambient air quality impact assessment was not performed for the following reasons: 1) VOCs do not have an ambient air quality standard, and 2) The Department of Health air modeling guidance generally exempts an applicant from performing an ambient air quality impact assessment for fugitive sources (storage tanks, etc.)

**Significant Permit Conditions:**

Attachment II(B) - Petroleum Storage Tanks, was previously modified on April 16, 2002 for tanks nos. 249 and 250, by clarifying and expanding Section G - 40 CFR Part 63, Subpart CC Requirements, by incorporating the requirements for external floating roof tanks converted to internal floating roof tanks as specified in 40 CFR §63.646. Similar to tanks nos. 249 and 250, the requirements for external floating roof tanks converted to internal floating roof tanks will apply to tank no. 275.

**Conclusion and Recommendations:**

The proposed minor modification will not result in any emission increases. All applicable state and federal regulations will continue to be met. Recommend approving the geodesic domed roof installation on petroleum storage tank no. 275 to meet the Refinery MACT requirements and amending the covered source permit subject to the significant permit condition noted above and a 45-day EPA review period.

Reviewer: Darin Lum  
Date: 6/2007