San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

August 19, 2021

Mr. Matthew Jalali
Alon Bakersfield Refining
6451 Rosedale Hwy
Bakersfied, CA 93308

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
Facility Number: S-33
Project Number: S-1211850

Dear Mr. Jalali:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project is for the installation of a new organic liquid loading/unloading rack, addition of a new acid gas treatment system to the existing sour water system, and to clarify the list of equipment changes to hydrocraker unit and gas plant #2.

The notice of preliminary decision for this project has been posted on the District's website (www.valleyair.org). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authorities to Construct with Certificates of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Samir Sheikh
Executive Director/Air Pollution Control Officer

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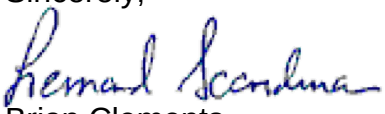
www.valleyair.org www.healthyairliving.com

Thank you for your cooperation in this matter.

Sincerely,



Brian Clements
Director of Permit Services

Enclosures

cc: Courtney Graham, CARB (w/enclosure) via email
cc: Laura Yannayon, EPA (w/enclosure) via EPS

San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review

Modifications to Renewable Fuels Project

Facility Name:	Alon Bakersfield Refining	Date:	August 17, 2021
Mailing Address:	6451 Rosedale Hwy, Bakersfield, CA 93308	Engineer:	Homero Ramirez
		Lead Engineer:	Leonard Scandura
Contact Person:	Matthew Jalali		
Telephone:	(661) 742-7243		
E-Mail:	Matthew.Jalali@bkrenewablefuels.com		
Application #(s):	S-33-56-34, '-63-15, '-124-14, '-401-4, and '-451-0		
Project #:	S-1211850		
Deemed Complete:	June 2, 2021		

I. Proposal

Alon Bakersfield Refining (Alon) has requested Authority to Construct (ATC) permits for modifications and installations in support of the Renewable Fuels Project, a project that is expected to convert approximately 15,000 barrels/day of pre-treated animal fat (tallow), other fats and greases, and vegetable oils into renewable diesel fuel. Specifically, the applicant requests the following ATCs:

- **S-33-451-0:** The applicant proposes the installation of a new organic liquid loading/unloading rack to load renewable naphtha, renewable propane, and renewable butane that are produced in the manufacture of renewable diesel. The rack will also be used to unload organic liquids from time to time.

- **S-33-63-15:** The applicant proposes to add a new acid gas treatment system to the existing sour water system (S-33-63). The new acid gas treatment system will remove ammonia and hydrogen sulfide from the off-gas stream.

The applicant also proposes the following ATC, which will not constitute an NSR modification as is discussed in the Rule 2201 section in this evaluation:

- **S-33-401-4:** The railcar loading/unloading operation is proposed to be rebuilt. To return it to service, the racks, arms, and other fugitive components will be replaced, as necessary. No changes to throughput or emission limits are proposed.

Additionally, the following two ATCs are requested to update the equipment description of outstanding ATCs S-33-56-33 and S-33-124-13, which will be implemented prior to or concurrently with the two proposed ATCs, and which will serve as the base documents for the

two proposed ATCs. Because the design has progressed and the physical changes to be made to these permit units have been further defined and/or clarified, the applicant is submitting updated descriptions of the changes to either add or remove additional equipment that is assessed solely fugitive VOC emissions. The applicant proposes to continue to comply with the existing daily emissions limits described in the outstanding ATCs.[1] These changes will also not constitute NSR modifications as is discussed in the Rule 2201 section in this evaluation.

- **S-33-56-34:** The applicant propose to modify hydrocracker unit #21 by updating the list of equipment changes (addition and removal of equipment) to outstanding ATC S-33-56-33, which will serve as the base document.

  The applicant also requests that the requirements of NSPS Subpart RRR (Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes), which apply to the new reactors approved by outstanding ATC S-33-56-33, to be incorporated into the ATC. Although this subpart applies to the previously-approved reactors, the requirements of this subpart were not specifically added previously when the outstanding ATC was issued.

- **S-33-124-14:** The applicant proposes to modify gas plant #2 by updating the list of equipment changes (addition and removal of equipment) to outstanding ATC S-33-124-13, which will serve as the base document.

The draft ATCs are included in Appendix A.

Disposition of Outstanding ATCs

Outstanding ATCs S-33-56-33 and -124-13 shall be implemented prior to or concurrently with their respective ATC in this project (per permit conditions on the new ATCs), so they will serve as the base documents for these two permit units. The two outstanding ATCs and the remaining current PTOs are included in Appendix B.

Alon received their Title V Permit in 1997. This modification can be classified as a Title V significant modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Alon must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (8/15/19)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (8/15/19)

[1] The updated description to these units will not result in an increase in emissions, and continued compliance is expected with the existing daily emissions limits described in outstanding ATCs S-33-56-33 and S-33-124-13. The updated descriptions to S-33-56 and -124 only involve equipment with fugitive emissions components. Since the fugitive emission components were previously approved, no previously-unauthorized emissions units are involved. As such, the proposed changes are not considered NSR modifications as is explained in the Rule 2201 discussion in this evaluation.

Rule 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4311	Flares (12/17/20)
Rule 4455	Components at Petroleum Refineries, Gas Liquids, Processing Facilities, and Chemical Plants (4/20/05)
Rule 4624	Transfer of Organic Liquids (12/20/07)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The facility is located at 6451 Rosedale Highway in Bakersfield, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

As part of its Renewable Fuels Project, Alon proposes to convert approximately 15,000 barrels per day (BPD) of pre-treated animal fat (tallow), other fats and greases, and vegetable oils, including but not limited to corn, soybean, and camelina oils into renewable diesel fuel (RDF). Small quantities of renewable naphtha, renewable butane, and renewable propane will be produced as byproducts. No crude oil or other hydrocarbon materials will be co-processed with the renewable feedstocks. Conventional diesel may be delivered to the facility to be blended with the finished renewable diesel product before it is delivered to customers.

The permitted units involved in this project are described below:

Sour Water and Oily Wastewater Operation (S-33-63)

The existing sour water system currently uses a steam stripper vessel to remove ammonia and hydrogen sulfide from the sour water stream. The gas stream coming from the steam stripper will consist mostly of carbon dioxide, water vapor, and trace amounts of hydrocarbon, ammonia, and hydrogen sulfide. This off-gas stream was previously processed in the Area 1 sulfur recovery units (such as S-33-16 and -338).

The permittee proposes to add a new acid gas treatment system to the sour water system. The new acid gas treatment system is a two-stage system that will remove ammonia and hydrogen sulfide from the gas stream before it is sent to the Area 2 Low Pressure Flare (S-33-65) for disposal. The liquid and gas streams associated with this new acid gas treatment system are expected to contain less than 10 percent VOC by weight, so VOC emissions are not assessed to this stream as is explained in the Calculations section. (See Appendix C for lab analysis).

The first stage ammonia removal will react the gas stream with sulfuric acid to produce ammonium sulfate. The liquid stream from this reaction vessel will be routed to an ammonium sulfate polisher to further remove any hydrogen sulfide from the ammonium sulfate stream. The liquid ammonium sulfate from the polisher will be sent to a storage tank for sales and the gas stream from the polisher will be recycled to the reaction vessel.

The gas stream from the reaction vessel, consisting mostly of carbon dioxide, water vapor, and hydrogen sulfide will be sent to a second-stage Valkyrie tail gas treatment vessel. The second stage vessel will separate the hydrogen sulfide in the gas stream into elemental sulfur, which will be sold as a product. The vent stream from the Valkyrie vessel will consist primarily of nitrogen, carbon dioxide and water vapor, with trace amounts of hydrocarbons, hydrogen, and hydrogen sulfide. The treated vent stream has negligible heating value and contains up to 10 ppmv hydrogen sulfide and 20 ppmv ammonia. This low volume treated vent stream will be sent to the Area 2 Low Pressure Flare (S-33-65). The flare will continue to comply with this permit conditions. Thus, directing the off-gas from this new gas treatment system to the flare is not modification of the flare.

Hydrocracker Unit #21 (S-33-56)

Hydrocracker Unit #21 will convert renewable feeds into renewable diesel and other products. Feed will be pumped from the feed staging tanks through preheat exchangers and filters into the Feed Drum. From there Dimethyl Disulfide (DMDS) and amine will be added to the reactor feed. Then feed will be pumped to the Hydrodeoxygenation (HDO) Reactors 21-R101 and 21-R102. Process heat will be provided by Reactor Feed Heaters 21-H11 and 21-H12. From the HDO Reactors, the process stream will be sent to the Isomerization Reactor 21-R103.

Reactor effluent will be sent to the High Pressure Hot Separator and then to the High Pressure Cold Separator. The bottoms from the High Pressure Cold Separator will go to the Low Pressure Flash Drum. Sour water from the Low Pressure Flash Drum will be sent to the Hydrocracker Water Flash Drum and then to the Sour Water Tank. Vapor from the Low Pressure Flash Drum will be sent to the Gas Plant 2.

Gas from the Cold High Pressure Separator will be sent to the High Pressure Absorber. Recycle gas from the High Pressure Absorber will be recycled to the Reactor Loop via the Recycle Compressors C11 and C12. Makeup hydrogen from the Hydrogen Plant is also compressed in the makeup cylinders of Recycle Compressors C11 and C12. Liquid from the High Pressure Hot Separator and the Low Pressure Flash Drum will be sent to the Stripper 21-V12. Renewable Diesel from the Stripper will be sent to the Renewable Diesel Storage Tanks.

A Purge Stream from the High Pressure Absorber overhead is routed through the High Pressure Membrane Package. The recovered hydrogen is compressed by Compressor C15 and returned to the reactor loop. The residue gas from the membrane is routed to Gas Plant 2.

Stripper overhead gas is sent through the Stripper Off-Gas Compressor and then combined with other process gas streams in the Low Pressure Absorber. Low pressure absorber overhead gas is routed through the Low Pressure Hydrogen Booster Compressor and then sent to the Low

Pressure Membrane Separation Skid. From there recovered hydrogen will be sent through the Hydrogen Booster Compressor and then to the Isomerization Reactor.

Specifically, the applicant has requested the following clarifications of the equipment previously authorized in ATC S-33-56-33 the hydrocracker unit:

- Install three (3) New Hydrotreating Reactors (21-R-101, R-102, and R-103)
- Install a new High-Pressure Hot Separator (21-D101), and High Pressure Absorber (21-V102)
- Reuse existing amine storage tank and install new metering pumps
- Install a new Dimethyl Disulfide (DMDS) Drum 21-D120 with associated filters and DMDS metering pumps
- Install a new High Pressure Membrane skid for hydrogen recovery
- Re-locate electrically driven compressor from Unit 14 (previously identified as 14-C2 in PTO S-33-13) to Unit 21. The compressor will be tagged as 21-C100; replace knockout drums
- Re-locate Low Pressure Membrane Separation Skid (14-Y100) from Unit 14 (PTO S-33-13)
- Replace and/or add internal components in various fractionators and drums as necessary
- Install and/or replace exchangers, drums, and vessels.
- Install miscellaneous equipment including piping, pumps, and other fugitive emission sources.
- Re-use existing heaters 21-H11 and 21-H12 with no physical changes
- Remove existing equipment and abandon in place portions of the existing process unit
- Perform maintenance on existing equipment.

Gas Plant #2 (S-33-124)

Gas Plant #2 will separate feed streams from Unit 21 into products such as renewable naphtha, renewable propane, renewable butane, and renewable gas. The renewable products are sent to storage and the recovered gas is treated to remove hydrogen sulfide and then routed to the fuel gas system. This project includes the replacement of trays in the depropanizer column, debutanizer, and deethanizer as required, along with the installation of vessels, exchangers, pumps, separator, and caustic treating process.

Specifically, the applicant has requested the following clarifications to the equipment previously authorized in ATC S-33-124-13 gas plant:

- Replace and/or add internal components in various fractionators and drums as necessary
- Reuse existing electrically driven compressor 21-C17/C18 in Stripper Offgas Compressor service
- Install a new Caustic Treater system to treat the renewable propane product
- Install a new LPG Dryer package
- Install and/or replace exchangers, drums, and vessels
- Install miscellaneous equipment including piping, pumps, and other fugitive emission sources

- Remove existing equipment and abandon in place portions of the existing process unit.

Railcar Loading/Unloading Operation (S-33-401)

The existing railcar loading/unloading rack (S-33-401) will be used to load renewable diesel product into rail cars. The applicant proposes to rebuild the loading/unloading operation to return it to service. To return it to service, the racks, arms, and other fugitive components will be replaced, as necessary. It is expected that more than 50 percent of the components in the rack will be replaced as part of this project. There will be no increase in design capacity, permitted emissions, or throughput limits from this project. Vapors collected from transfer operations at this rack will be continue to be routed to the existing facility vapor recovery system, consistent with existing permit conditions.

Truck Organic Liquid Loading/Unloading Rack (S-33-451)

Alon proposes to construct a new renewable naphtha, renewable propane, and renewable butane truck loading/unloading rack that will consist of two transfer stations. The new rack will load renewable naphtha from tanks connected to vapor recovery and will load renewable propane and renewable butane from permit-exempt pressure vessels. The rack will also be used to unload organic liquids from time to time. Vapors collected from transfer operations at this rack will be routed to the existing facility vapor recovery system. Up to 40 tanker trucks per day will be loaded/unloaded at the rack.

V. Equipment Listing

New Permit Unit:

S-33-451-0: ORGANIC LIQUID TRUCK LOADING/UNLOADING RACK WITH TWO TRANSFER STATIONS, CONNECTED TO FACILITY VAPOR RECOVERY SYSTEM

Pre-Project Equipment Description:

S-33-56-33: HYDROCRACKER UNIT #21 INCLUDING 9 HEATERS, CATALYTIC ASSEMBLY, AND MISC AIR COOLERS, EXCHANGERS , DRUMS, AND PUMPS - AREA 2

S-33-63-14: SOUR WATER AND OILY WASTEWATER OPERATION INCLUDING HYDROCRACKER AND PHENOLIC SOUR WATER STRIPPING, PHOSAM UNIT, OIL WASTEWATER CLASSIFIER (83D-13), AND MISCELLANEOUS TANKS AND ASSOCIATED PIPING - AREA 2

S-33-124-13: GAS PLANT #2 INCLUDING AMINE REGENERATION SYSTEM, VOC COALESCER, DRYER SYSTEM, DE-ETHANIZER, DE-PROPANIZER, PIPING TO SRU #1 (PTO #S-33-16) AND MISC. PUMPS, PIPING AND VESSELS

S-33-401-3: RAILCAR LOADING/UNLOADING OPERATION WITH 8 TRANSFER STATIONS

Proposed Modification:

S-33-56-34: MODIFICATION OF HYDROCRACKER UNIT #21 INCLUDING 9 HEATERS, CATALYTIC ASSEMBLY, AND MISC AIR COOLERS, EXCHANGERS , DRUMS, AND PUMPS - AREA 2: INSTALL 3 REACTORS, HIGH PRESSURE SEPARATOR, EXCHANGERS, VESSELS, HIGH PRESSURE MEMBRANE SKID, PUMPS, LEAN OIL ABSORBER, ELECTRICALLY-DRIVEN COMPRESSOR, REMOVE EXISTING HEAT EXCHANGERS

S-33-63-15: MODIFICATION OF SOUR WATER AND OILY WASTEWATER OPERATION INCLUDING HYDROCRACKER AND PHENOLIC SOUR WATER STRIPPING, PHOSAM UNIT, OIL WASTEWATER CLASSIFIER (83D-13), AND MISCELLANEOUS TANKS AND ASSOCIATED PIPING - AREA 2: ADD ACID TREATMENT SYSTEM

S-33-124-14: MODIFICATION OF GAS PLANT #2 INCLUDING AMINE REGENERATION SYSTEM, VOC COALESCER, DRYER SYSTEM, DE-ETHANIZER, DE-PROPANIZER, PIPING TO SRU #1 (PTO #S-33-16) AND MISC. PUMPS, PIPING AND VESSELS: REPLACE TRAYS IN DE-PROPANIZER COLUMN, DE-BUTANIZER, AND DE-ETHANIZER AS REQUIRED, INSTALL VESSELS, EXCHANGERS, PUMPS, SEPARATORS, AND CAUSTIC TREATING PROCESS

S-33-401-4: MODIFICATION OF RAILCAR LOADING/UNLOADING OPERATION WITH 8 TRANSFER STATIONS: REBUILD RAILCAR LOADING/UNLOADING OPERATION

Post-Project Equipment Description:

S-33-56-34: HYDROCRACKER UNIT #21 INCLUDING 9 HEATERS , CATALYTIC ASSEMBLY, AND MISC AIR COOLERS, EXCHANGERS, DRUMS, AND PUMPS, HIGH PRESSURE MEMBRANE SKID - AREA 2

S-33-63-15: SOUR WATER AND OILY WASTEWATER OPERATION INCLUDING HYDROCRACKER AND PHENOLIC SOUR WATER STRIPPING, PHOSAM UNIT, ACID GAS TREATMENT SYSTEM, OIL WASTEWATER CLASSIFIER (83D-13), AND MISCELLANEOUS TANKS AND ASSOCIATED PIPING - AREA 2

S-33-124-14: GAS PLANT #2 INCLUDING DRYER SYSTEM, DE-ETHANIZER, DE-PROPANIZER, DE-BUTANIZER AND MISC. PUMPS, PIPING, VESSELS, EXHANGERS, SEPARATORS, AND CAUSTIC TREATING PROCESS

S-33-401-4: RAILCAR LOADING/UNLOADING OPERATION WITH 8 TRANSFER STATIONS

S-33-451-0: ORGANIC LIQUID TRUCK LOADING/UNLOADING RACK WITH TWO TRANSFER STATIONS, CONNECTED TO FACILITY VAPOR RECOVERY SYSTEM

VI. Emission Control Technology Evaluation

Fugitive Components

VOC emissions result from leaks in piping components (such as valves and flanges). Fugitive VOC emissions from fugitive components are controlled via Rule 4623 (within 5 feet of each tank) and Rule 4455 (for all other components).

Organic Liquid Transfer

VOC emissions from organic liquid loading/unloading racks occur due to displaced vapors that contain VOC and to losses when loading lines are disconnected from the delivery vessels. The products to be received at the facility from truck and railcar unloading operations are vegetable oils and petroleum diesel for blending, both of which have low vapor pressures. Loading renewable diesel into railcars and tanker trucks will be controlled by a vapor recovery system.

Renewable naphtha, renewable propane, and renewable butane are more volatile than renewable diesel and those transfer operations will also be controlled by vapor recovery. All vapor recovery lines from transfer operations will be directed to the existing vapor recovery system at the facility. Leakage during hose disconnects is limited by Rule 4624.

Fugitive Components

VOC emissions result from leaks in piping components (such as valves and flanges). Fugitive VOC emissions from fugitive components are controlled via Rule 4623 (within 5 feet of each tank) and Rule 4455 (for all other components).

VII. General Calculations

As is noted in the Rule 2201 discussion in this evaluation, the changes requested for ATCs S-33-56, -124, and -401 are not considered NSR modifications. As such, emission calculations will not be necessary for those units.

A. Assumptions

S-33-63-15 (Adding new acid gas treatment system to sour water operation):

- This application is to install a new acid gas treatment system to the sour water and oily wastewater operation. Only fugitive VOC emissions are emitted.
- The components associated with the new acid gas removal system (and the existing equipment's components) all handle fluids that contain less than 10% VOC by weight. (See VOC weight fraction analysis in Appendix C.) Pursuant to District policy SSP-2015 (Procedures for Quantifying Fugitive VOC Emissions At Petroleum and SOCMI Facilities), VOC emissions are not assessed to piping and components handling fluid streams with a VOC content of 10% or less by weight. Permit conditions requiring periodic monitoring and record keeping to verify the VOC content is 10% or less by weight will be required.

S-33-451-0 (New organic liquid loading/unloading rack):

- There are only potential VOC emissions from this operation—from the fugitive VOC emissions emitted from the components and from the VOC emissions resulting from spillage during disconnections.

  Fugitive VOC Emissions

  - Facility will operate 24 hours per day, 7 days per week, and 52 weeks per year.
  - Only fugitive VOCs emitted from components in gas service are calculated.
  - Fugitive emissions from heavy oil liquid service components are negligible.

  Disconnect Emissions

  - Potential VOC emissions will result from disconnect losses. The following assumptions are made to quantify disconnect losses:
  - Assume all disconnect spillage volatilizes as VOC
  - Spillage per disconnect = 10 mL (typical for liquid loading/unloading racks) (Applicant and Rule 4624 limit)
  - # of disconnects = 1 per vessel (Applicant)
  - Negligible emissions from vapor line disconnects at the top of each railcar or truck
  - Total number of vessels loaded/unloaded = 40 per day (Applicant)

B. Emission Factors

S-33-451-0 (New organic liquid loading/unloading rack):

Potential fugitive VOC emissions for the fugitive components associated with this application are calculated using *California Implementation Guidelines for Estimating Mass Emissions of fugitive Hydrocarbon Leaks at Petroleum Facilities, CAPCOA/CARB, February 1999*. The correlation equation emission factors for refineries and marketing terminals as defined in Table IV-3a of CAPCOA guideline document are used as the basis for the existing emission limit.

The correlation equation method requires data from Method 21 leak monitoring inspections on these components, to establish the % Default Zero, % Pegged, and % within Correlation range. The screening range concentrations applied for each component type (shown below) are based Rule 4455 leak threshold for minor leaks. Because Rule 4624 prohibits major leaks, the % Pegged is set to zero for the transfer racks.

The following are the screening range concentrations applies for each component type:

Component Type:	Correlation Screening Values (ppm):
Valves	200
Pressure Relief Devices	200
Others	500
Connectors	200
Flanges	200

In the CAPCOA Correlation Equation Method, VOC emissions from fugitive components are calculated as follows:

If the screening value is less than 10,000 ppmv, then

Emissions (lb/yr) = CF1 x SV^{CF2} x (2.20462 lb/1 kg) x (8760 hr/yr), where

CF1 = Correlation factor 1 for specific component type
SV = Measured screening value, ppmv VOC
CF2 = Correlation factor 2 for specific component type

If the screening value is 10,000 ppmv or more, then the CAPCOA supplies a "pegged value" emission rate to use for each component type. Total emissions are determined by summing the emissions from each component.

TABLE IV-3a: CAPCOA-Revised 1995 EPA Correlation Equations and Factors for Refineries and Marketing Terminals [a]

Equipment Type	Service	Default Zero Factor [b] (kg/hr)	Correlation Equation [c] (kg/hr)	Pegged Factor [d] 10,000 ppmv (kg/hr)
Valves	All	0.0000078	$2.27*10^{-6}*(SV)^{0.747}$	0.064
Pump Seals	All	0.000019	$5.07*10^{-5}*(SV)^{0.622}$	0.089
Others [e]	All	0.000004	$8.69*10^{-6}*(SV)^{0.642}$	0.082
Connectors	All	0.0000075	$1.53*10^{-6}*(SV)^{0.736}$	0.03
Flanges	All	0.00000031	$4.53*10^{-6}*(SV)^{0.706}$	0.095
Open-Ended Lines	All	0.000002	$1.90*10^{-6}*(SV)^{0.724}$	0.033

[a] Source: SBCAPCD Report, dated May 1, 1997, entitled Review of the 1995 Protocol: Thea Correlation Equation Approach To Quantifying Fugitive Hydrocarbon Emissions At Petroleum Industry Facilities. Technical corrections and adjustments were made to the refineries and marketing terminals bagged data, obtained by use of the blow through method, to account for the hydrocarbon leak flow rate.

[b] The default zero factors apply only when the screening value (SV), corrected for background, equals 0.0 ppmv (i.e., the screening value is indistinguishable from background reading). The default zero factors

were based on the combined 1993 refinery and marketing terminal data only; default zero data were not collected from oil and gas production facilities.

[c] The correlation equations apply for actual screening values, corrected for background, between background and 9,999 ppmv and can be used for screening values up to 99,999 ppmv at the discretion of the local district.

[d] The 10,000 ppmv pegged factors apply for screening values, corrected for background, equal to or greater than 10,000 ppmv and are used when the correlation equations are used for screening values between background and 9,999 ppmv.

[e] The "other" component type includes instruments, loading arms, pressure relief valves, vents, compressor seals, dump lever arms, diaphragms, drains, hatches, meters, and polished rods stuffing boxes. This "others" component type should be applied for any component type other than connectors, flanges, open-ended lines, pumps, or valves. H.

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Since S-33-451-0 is a new unit, its PE1 = 0 for all pollutants. The PE1 values for the existing permit units in this project are taken from their current permits (or outstanding ATCs which will be the base documents as explained earlier) and are listed in the table below:

PE1 (lb/day)					
Permit Unit	**NO_X**	**SO_X**	**PM_{10}**	**CO**	**VOC**
ATC S-33-56-33 [2]	373.8	142.7	61.0	1293.1	73.5
S-33-63-14 [3]	0	0	0	0	0
ATC S-33-124-13	0	0	0	0	23.8
S-33-401-3	0	0	0	0	0.8
S-33-451-0	0	0	0	0	0

[2] Outstanding ATCs S-33-56-33 and -124-13 shall be implemented prior to or concurrently with their respective ATC in this project, so the values from those outstanding ATCs represent the PE1 values for this project.
[3] Emissions from this permit unit are zero because only potential fugitive VOC emissions may be emitted, and all the components associated with the permit only handle fluid streams with a VOC content of 10% or less by weight.

PE1 (lb/year)					
Permit Unit	**NO_X**	**SO_X**	**PM_{10}**	**CO**	**VOC**
ATC S-33-56-33	84,261	52,096	24,190	467,947	26,790
S-33-63-14	0	0	0	0	0
ATC S-33-124-13	0	0	0	0	8,682
S-33-401-3	0	0	0	0	303
S-33-451-0	0	0	0	0	0

2. Post-Project Potential to Emit (PE2)

As is explained below, the PE2 values for the existing permit units will not change. Only the PE2 for the new permit unit (S-33-451-0) will increase with this project.

S-33-56-34 (Modify hydrocracker #21 by adding vessels, components):
S-33-124-14 (Modify gas plant #2 by updating list of equipment):
S-33-401-4 (Rebuild railcar loading/unloading operation):

The changes requested for these three applications are not NSR modifications and will not result in changes in emissions, the PE2 = PE1 for these permit units.

S-33-63-15 (Adding new acid gas treatment system to sour water operation):

As is explained above, the new acid gas treatment system process stream is less than 10% VOC, so emissions are not assessed to this new system. Thus, the PE2 = PE1 for this application.

S-33-451-0 (New organic liquid loading/unloading rack):

The PE for the new emissions unit includes the fugitive VOC emissions from the components (which are calculated in the fugitive VOC emission calculations in Appendix D) and VOC emissions from the disconnection losses.

PE VOC fugitive = 1.2 lb-VOC/day and 425 lb-VOC/yr (See fugitive emission calculations in Appendix D.)

PE VOC disconnections
= (40 disconnects/day)(10 mL/disconnect)(8.33 lb/gallon)(1 gallon/3785 mL)
= 0.88 lb-VOC/day
= (0.88 lb-VOC/day)(365 day/yr) = 321 lb-VOC/yr

PE VOC total = 1.2 lb/day fugitives + 0.9 lb/day disconnections = 2.1 lb/day
PE VOC total = 425 lb/yr fugitives + 321 lb/year disconnections = 746 lb/year

The post-project potential to emit for all the permit unit in this project are summarized in the table below.

PE2 (lb/day)					
Permit Unit	**NO_X**	**SO_X**	**PM_{10}**	**CO**	**VOC**
S-33-56-34	373.8	142.7	61.0	1293.1	73.5
S-33-63-15	0	0	0	0	0
S-33-124-14	0	0	0	0	23.8
S-33-401-4	0	0	0	0	0.8
S-33-451-0	0	0	0	0	2.1

PE2 (lb/year)					
Permit Unit	**NO_X**	**SO_X**	**PM_{10}**	**CO**	**VOC**
S-33-56-34	84,261	52,096	24,190	467,947	26,790
S-33-63-15	0	0	0	0	0
S-33-124-14	0	0	0	0	8,682
S-33-401-4	0	0	0	0	303
S-33-451-0	0	0	0	0	746

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

Facility emissions are already above the Offset and Major Source Thresholds for VOC emissions; therefore, SSPE1 calculations are not necessary.

4. Post-Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

Since facility emissions are already above the Offset and Major Source Thresholds for VOC emissions, SSPE2 calculations are not necessary.

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months), pursuant to the Clean Air Act, Title 3, Section 302, US Codes 7602(j) and (z)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 70.2

This source is an existing Major Source for VOC emissions and will remain a Major Source for VOC. No change in other pollutants are proposed or expected as a result of this project.

Rule 2410 Major Source Determination:

The facility (a petroleum refinery) or the equipment evaluated under this project is listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 100 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO_2	VOC	SO_2	CO	PM	PM_{10}
Estimated Facility PE before Project Increase		> 100 [4]				
PSD Major Source Thresholds	100	100	100	100	100	100
PSD Major Source?	No	Yes	No	No	No	No

As shown above, the facility is an existing PSD major source for at least one pollutant.

[4] See SSPE Calculations in Appendix F. Note that facilities S-33, S-34, and S-3303 are part of the same stationary source.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

S-33-63 (New Acid Gas Treatment System)

Only the new acid gas treatment system is a new emissions unit. The emissions units associated with the existing fugitive components that are part of this permit unit are not being modified.

Since acid gas treatment system is a new emissions unit, BE = PE1 = 0 for all pollutants.

S-33-451 (New Liquid Loading/Unloading Rack)

The new loading/unloading rack is new. Since this is a new emissions unit, BE = PE1 = 0 for all pollutants.

7. SB 288 Major Modification

40 CFR Part 51.165 defines a SB 288 Major Modification as any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.

Since this facility is a major source for VOC, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if further SB 288 Major Modification calculation is required.

Petroleum refineries fall within the 28 source categories that are required to include fugitive emissions in the Federal Major Modification determination. Therefore, fugitive emissions are included in the Federal Major Modification determination for this project.

As calculated in the Calculation section above:

SB 288 Major Modification Thresholds			
Pollutant	**Project PE2 (lb/year)**	**Threshold (lb/year)**	**SB 288 Major Modification Calculation Required?**
NO_x	0	50,000	No
SO_x	0	80,000	No
PM_{10}	0	30,000	No
VOC	746 [5]	50,000	No

Since none of the SB 288 Major Modification Thresholds are surpassed with this project, this project does not constitute an SB 288 Major Modification and no further discussion is required.

8. Federal Major Modification / New Major Source

Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

As defined in 40 CFR 51.165, Section (a)(1)(v) and part D of Title I of the CAA, a Federal Major Modification is any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act. The significant net emission increase threshold for each criteria pollutant is included in Rule 2201.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. In step 1, emission decreases can not cancel out the increases. Step 2 allows consideration of the project's net emissions increase as described in 40 CFR 51.165 and the Federal Clean Air Act Section 182 (e), as applicable.

Petroleum refineries fall within the 28 source categories that are required to include fugitive emissions in the Federal Major Modification determination. Therefore, fugitive emissions are included in the Federal Major Modification determination for this project.

[5] Pursuant to APR-1150, if an emissions unit is not undergoing a physical change or an actual change in the method of operation, it must not be included in the SB 288 Major Modification and the Federal Major modification applicability calculation. The PE from the emission units that are being modified in this project are the following: Project PE2 = 0 lb (from S-33-63) + 746 lb (from S-33-451) = 746 lb-VOC/yr.

Step 1: Project Emissions Increase

For new emissions units, the increase in emissions is equal to the PE2 for each new unit included in this project:

Emission Increase = PE2

Project Emissions Increase

The project's combined total emission increases are calculated summarized in the following table and are compared to the Federal Major Modification Thresholds in the following table.

Federal Major Modification Thresholds for Emission Increases			
Pollutant	**Total Emissions Increases (lb/yr)**	**Thresholds (lb/yr)**	**Federal Major Modification?**
NO_x*		0	
VOC*	746 [6]	0	Yes
PM_{10}		30,000	
$PM_{2.5}$		20,000	
SO_x		80,000	

*If there is any emission increases in NO_x or VOC, this project is a Federal Major Modification and no further analysis is required.

Since there is an increase in VOC emissions, this project constitutes a Federal Major Modification. Consequently, as discussed below in the offset section of this evaluation, pursuant to Section 7.4.2.1 of District Rule 2201, VOC Emission Reduction Credits (ERCs) used to satisfy the offset quantity required under District Rule 2201 must surplus at the time of use (ATC issuance).

Separately, Federal Offset Quantity is calculated below.

New Major Source

As demonstrated above, this facility is not becoming a Major Source as a result of this project, therefore, this facility is not a New Major Source pursuant to 40 CFR 51.165 a(1)(iv)(A)(3).

[6] Pursuant to APR-1150, if an emissions unit is not undergoing a physical change or an actual change in the method of operation, it must not be included in the SB 288 Major Modification and the Federal Major modification applicability calculation. The PE from the emission units that are being modified in this project are the following: Project PE2 = 0 lb (from S-33-63) + 746 lb (from S-33-451) = 746 lb-VOC/yr.

Since the project emissions increase does not exceed the Major Source thresholds for any pollutant, this facility is not a New Major Source pursuant to 40 CFR 51.165 a(1)(iv)(A)(3) and no further discussion is required.

Federal Offset Quantity Calculation

The Federal Offset Quantity (FOQ) is only calculated for the pollutants for which a project is a Federal Major Modification or a New Major Source as determined above.

Pursuant to 40 CFR 51.165(a)(3)(ii)(J), the federal offset quantity is the sum of the annual emission changes for all new and modified emission units in a project calculated as the potential to emit after the modification (PE2) minus the actual emissions (AE) for each emission unit times the applicable federal offset ratio.

FOQ = ∑(PE2 – AE) x Federal offset ratio

Actual Emissions

As described in 40 CFR 51.165(a)(1)(xii), actual emissions (AE), as of a particular date, shall equal the average rate, in tons per year, at which the unit actually emitted the pollutant during a consecutive 24-month period which precedes the particular date and which is representative of normal source operation. The reviewing authority shall allow the use of a different time period upon a determination that it is more representative of normal source operation.

S-33-63 (New Acid Gas Treatment System)
S-33-451 (New Liquid Loading/Unloading Rack)

Since these two are new units, AE = 0 for S-33-63 (specifically the new acid gas treatment system) and -451.

As is explained in the Rule 2201 discussion, the remaining applications in this project are not NSR modification.

Federal Offset Ratio

According the CAA 182(e), the federal offset ratio for VOC and NOx is 1.5 to 1 (due to the District extreme non-attainment status for ozone).

Federal Offset Quantity (FOQ)

Since this project only include new units,
FOQ = PE2 x Federal offset ratio.

VOC **Federal Offset Ratio** **1.5**

Permit No.	Post-Project Potential to Emit (PE2) (lb/year)	Actual Emissions (lb/year)	Emissions Change (lb/yr)
S-33-63-15	0	0	0
S-33-451-0	746	0	746
		∑(PE2 – AE) (lb/year):	**746**
		Federal Offset Quantity (lb/year): ∑(PE2 – AE) x 1.5	**1,119**
		Federal Offset Quantity (tons/year): ∑(PE2 – AE) x 1.5 ÷ 2,000	**0.56**

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

This project only involves VOC emissions. The District has been classified nonattainment for VOC. Therefore, Rule 2410 does not apply to this project.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix J.

VIII. Compliance Determination

Rule 2201 New and Modified Stationary Source Review Rule

Three of the applications in this project do not constitute NSR Modifications as is explained below.

Rule 2201 Section 3.25 defines a Modification as any action including at least one of the following items:

3.25.1.1 Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.

Rebuilding the railcar loading/unloading operation (S-33-401) and updating the list of equipment for hydrocracker #21 (S-33-56) and gas plant #2 (S-33-124) do not result in any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.

Please note that there are no changes to the permit conditions for the railcar loading/unloading operation (S-33-401).

3.25.1.2 Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. A Routine Replacement Emissions Unit shall not be considered to be a structural change.

Rebuilding the railcar loading/unloading operation (S-33-401) and updating the list of equipment for hydrocracker #21 (S-33-56) and gas plant #2 (S-33-124) are not structural changes or additions to existing emissions units which would necessitate a change in permit conditions.

3.25.1.3 An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.

Rebuilding the railcar loading/unloading operation (S-33-401) and updating the list of equipment for hydrocracker #21 (S-33-56) and gas plant #2 (S-33-124) do not result in an increase in emissions.

3.25.1.4 Addition of any new emissions unit which is subject to District permitting requirements.

Rebuilding the railcar loading/unloading operation (S-33-401) and updating the list of equipment for hydrocracker #21 (S-33-56) and gas plant #2 (S-33-124) do not result in any new emissions units which are subject to District permitting requirements.[7]

3.25.1.5 A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Rebuilding the railcar loading/unloading operation (S-33-401) and updating the list of equipment for hydrocracker #21 (S-33-56) and gas plant #2 (S-33-124) are not changes in permit terms or conditions proposed by the applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, those three application will not be considered NSR Modifications and will not need to be included in the Rule 2201 discussions below.

[7] The updated description to these units will not result in an increase in emissions, and continued compliance is expected with the existing daily emissions limits described in outstanding ATCs S-33-56-33 and S-33-124-13. The updated descriptions to S-33-56 and -124 only involve equipment with fugitive emissions components. Since the fugitive emission components were previously approved, no previously-unauthorized emissions units are involved.

A. Best Available Control Technology (BACT)

1. BACT Applicability

Pursuant to District Rule 2201, Section 4.1, BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

a. Any new emissions unit with a potential to emit exceeding two pounds per day,
b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an Adjusted Increase in Permitted Emissions (AIPE) exceeding two pounds per day, and/or
d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

S-33-63-15 (Adding new acid gas treatment system to sour water operation):

The acid gas treatment system to be added to the sour water operation is a new emissions unit, however its PE is less than 2 lb/day for all pollutants as shown in Section VII.C.2. Therefore, BACT is not triggered for the acid gas treatment system.

S-33-451-0 (New organic liquid loading/unloading rack):

As seen in Section VII.C.2 above, the applicant is proposing to install a new organic liquids loading/unloading rack with a PE greater than 2 lb-VOC/day. Therefore BACT is triggered for VOC emissions for the new liquid loading/unloading rack.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

As discussed in Section I above, there are no modified emissions units associated with this project. Therefore BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project constitutes a Federal Major Modification for VOC emissions. Therefore BACT is triggered for VOC for all emissions units in the project for which there is an emission increase. [8]

BACT is required for the new organic liquid loading/unloading rack (S-33-451) since it will result in an emissions increase. BACT is not required for the other emissions units they do not have an emission increase.

2. BACT Guideline

BACT is trigger for liquid loading/unloading rack (S-33-451) only. BACT Guideline 7.1.10, applies to organic liquid loading racks. (See Appendix G.)

3. Top-Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, a Top-Down BACT analysis shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule.

Pursuant to the attached Top-Down BACT Analysis (see Appendix H), BACT has been satisfied with the following:

VOC: Top loading drop tubes (equivalent to bottom fill loading) with dry break couplers and VOC emissions from the vapor collection and control system less than or equal to 0.015 pounds per 1,000 gallons of organic liquid handled

B. Offsets

1. Offset Applicability

Pursuant to District Rule 2201, Section 4.5, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

[8] Pursuant to APR-1150 (Implementation of Rule 2201 for SB288 Major Modifications and Federal Major Modifications), Rule 2201 section 4.1.3 requires BACT for any new or modified emission unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification. The policy states however, that for modified emission units, only those undergoing a physical change or an actual change in the method of operation are subject to BACT requirement. Emission units not undergoing a physical change or an actual change in the method of operation are not subject to BACT requirement.

Offset Determination (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
SSPE2	- -	- -	- -	- -	> 20,000
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets Triggered?					Yes

2. Quantity of District Offsets Required

District Offset Quantities Calculation

As demonstrated above, the facility has an SSPE1 for VOC greater than the offset thresholds. Therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = (Σ[PE2 – BE] + ICCE) x DOR, for all new or modified emissions units in the project,

Where,
PE2 = Post-Project Potential to Emit, (lb/year)
BE = Baseline Emissions, (lb/year)
ICCE = Increase in Cargo Carrier Emissions, (lb/year)
DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = HAE

As calculated in Section VII.C.6 above, the BE values from the new acid gas treatment system and truck loading/unloading rack are each equal to the PE1 since they are both new.

Based on the ERC being proposed to satisfy offset requirements, the offset ratio is 1.5:1, the amount of VOC ERCs that need to be withdrawn is:

Offsets Required (lb/year) = (Σ[PE2 – BE] + ICCE) x DOR

	PE2 (lb-VOC/yr)	BE (lb-VOC/yr)	ICCE (lb-VOC/yr)	PE2 - BE-ICCE
S-33-63-15	0	0	0	0
S-33-451-0	746	0	0	746
(Σ[PE2 – BE] + ICCE)				746

Offsets Required (lb/year) = (Σ[PE2 – BE] + ICCE) x DOR
= 746 x 1.5 for VOC offsets for federal major modifications
= 1,119 lb-VOC/year

Calculating the appropriate quarterly emissions to be offset is as follows:

Quarterly offsets required (lb/qtr) = (1,119 lb-VOC/year) ÷ (4 quarters/year)
= 279.75 lb-VOC/qtr

As demonstrated in the calculation above, the quarterly amount of offsets required for this project, when evenly distributed to each quarter, results in fractional pounds of offsets being required each quarter. Since offsets are required to be withdrawn as whole pounds, the quarterly amounts of offsets need to be adjusted to ensure the quarterly values sum to the total annual amount of offsets required.

To adjust the quarterly amount of offsets required, the fractional amount of offsets required in each quarter will be summed and redistributed to each quarter based on the number of days in each quarter. The redistribution is based on the Quarter 1 having the fewest days and the Quarters 3 and 4 having the most days. The redistribution method is summarized in the following table:

Redistribution of Required Quarterly Offsets (where X is the annual amount of offsets, and X ÷ 4 = Y.z)				
Value of z	**Quarter 1**	**Quarter 2**	**Quarter 3**	**Quarter 4**
0.0	Y	Y	Y	Y
0.25	Y	Y	Y	Y+1
0.5	Y	Y	Y+1	Y+1
0.75	Y	Y+1	Y+1	Y+1

Therefore the appropriate quarterly emissions to be offset are as follows:

1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	**Total Annual**
279	280	280	280	**1,119**

District and Federal Offset Quantities

As discussed above, District offsets are triggered and required for VOC under NSR. In addition, as demonstrated above, this project does trigger Federal Major Modification requirements for VOC emissions.

Since District offsets and federal offsets are required, the facility must provide offset amounts equal to the greatest value between the District offset quantity and the federal offset quantity.

Comparison of District vs Federal VOC Offset Quantity			
	DOQ	**FOQ**	**FOQ ≥ DOQ**
VOC	1,119	1,119	**Yes**

As demonstrated above, the federal offset quantity required is greater than or equal to the District offset quantity. Therefore, pursuant to Section 7.4.1.2 of District Rule 2201, the facility must comply with the required federal offset quantities. In addition, emission reduction credits used to satisfy federal offset quantities for VOC must be creditable and surplus at the time of use (ATC issuance).

Surplus at the Time Of Use Emission Reduction Credits

The applicant has stated that the facility plans to use ERC certificate S-5178-1 to satisfy the federal offset quantities for VOC required for this project. Pursuant to the ERC surplus analysis in Appendix L, the District has verified that the credits from the ERC certificate provided by the applicant are sufficient to satisfy the federal offset quantities for VOC required for this project.

Required District and Federal Offset Quantities Summary

The applicant has proposed to use the following emission reduction certificates:

	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
ERC #S-5178-1				
Face value (lb-VOC)	29,099	29,898	30,307	30,215
Surplus value (lb-VOC)	15,568	15,995	16,217	16,165

As discussed above, the facility has sufficient credits to fully offset the quarterly VOC emissions increases associated with this project.

Proposed Rule 2201 Offset Permit Conditions

The following permit conditions will be added to ATC S-33-451-0:

- {GC# 4447 - edited} Prior to operating equipment under this Authority to Construct, permittee shall surrender surplus VOC emission reduction credits for the following quantity of emissions: 1st quarter - 279 lb, 2nd quarter - 280 lb, 3rd quarter - 280 lb, and fourth quarter - 280 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201]

- {GC# 1983} ERC Certificate Number S-5178-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201]

3. ERC Withdrawal Calculations

The applicant must identify the ERC Certificate(s) to be used to offset the increase of VOC emissions for the project. As indicated in previous section, the applicant is proposing to use ERC certificate #S-5178-1 to mitigate the increases of VOC emissions associated with this project. See Appendix K for detailed ERC Withdrawal Calculations.

C. Public Notification

1. Applicability

Pursuant to District Rule 2201, Section 5.4, public noticing is required for:

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
c. Any project which results in the offset thresholds being surpassed,
d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant, and/or
e. Any project which results in a Title V significant permit modification

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

As demonstrated in Section VII.C.7 of this evaluation, this project is a Federal Major Modification. Therefore, public noticing is required for this project for Federal Major Modification purposes.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

c. Offset Threshold

Public notification is required if the pre-project Stationary Source Potential to Emit (SSPE1) is increased to a level exceeding the offset threshold levels. The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

Offset Thresholds				
Pollutant	**SSPE1 (lb/year)**	**SSPE2 (lb/year)**	**Offset Threshold**	**Public Notice Required?**
NO_X			20,000 lb/year	
SO_X			54,750 lb/year	
PM_{10}			29,200 lb/year	
CO			200,000 lb/year	
VOC	> 20,000	> 20,000	20,000 lb/year	No

As demonstrated above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	**SSPE2 (lb/year)**	**SSPE1 (lb/year)**	**SSIPE (lb/year)**	**SSIPE Public Notice Threshold**	**Public Notice Required?**
NO_x				20,000 lb/year	
SO_x				20,000 lb/year	
PM_{10}				20,000 lb/year	
CO				20,000 lb/year	
VOC	> 20,000	> 20,000	746	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project constitutes a Title V significant modification. Therefore, public noticing for Title V significant modifications is required for this project.

2. Public Notice Action

As discussed above, public noticing is required for this project. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and a public notice will be electronically published on the District's website prior to the issuance of the ATC for this equipment.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

This project only affects fugitive VOC emissions from the components for all the units and disconnection losses for the loading/unloading racks as listed below:

Proposed Rule 2201 (DEL) Conditions:

S-33-63-15:

- The VOC content of the fluids handled by the acid gas removal system shall not exceed 10% by weight. [District Rules 2201]

- Operator shall conduct quarterly gas sampling for gas handled by acid gas removal system to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rules 2201]

- The VOC content shall be determined using American Society of Testing and Materials (ASTM) D 1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304 for liquids. [District Rule 4455, 6.4.2]

S-33-451-0:

- There shall be no more than 40 tank truck loadings/unloadings per day. [District Rule 2201]

- Permit holder shall maintain accurate component count and resultant emissions according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-3a (Feb 1999), Correlation Equations Method. Permit holder shall update such records when new components are approved and installed. Components shall be screened and leak rate shall be measured in accordance with the frequency of inspection specified in Rule 4455 as applicable. [District Rule 2201]

- VOC emission rate from fugitive components associated with this emissions unit shall not exceed 1.2 lb/day. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required for the equipment involved in this project to demonstrate compliance with Rule 2201.

2. Monitoring

Method 21 monitoring is performed as required by District Rule 4455 for the fugitive components associated with these modifications and as required District Rule 4623 for the vapor collection system associated with the organic liquid tanks.

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The permittee is required to maintain records of fugitive component inspections as well as records associated with disconnection and throughput of the loading/unloading racks.

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

F. Ambient Air Quality Analysis (AAQA)

Section 4.14 of District Rule 2201 requires that an AAQA be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. However, VOC does not have an air quality standard; therefore, since this project only involves VOC emissions an AAQA in not required.

G. Compliance Certification

Section 4.15.2 of this Rule requires the owner of a New Major Source or a source undergoing a Federal Major Modification to demonstrate to the satisfaction of the District that all other Major Sources owned by such person and operating in California are in compliance or are on a schedule for compliance with all applicable emission limitations and standards. This project constitutes a Federal Major Modification, therefore this requirement is applicable. The applicant indicates that the owner of Alon Bakersfield Refining does not operate any other major sources in California. Therefore, the compliance certification included in Appendix E, which applies to the subject stationary source, satisfies this requirement.

H. Alternate Siting Analysis

The current project occurs at an existing facility. The applicant proposes to install a new organic liquid loading/unloading rack, a new acid gas treatment system to existing operations. Since the project will provide organic liquid to be used at the same location, the existing site will result in the least possible impact from the project. Alternative sites would involve the relocation and/or construction of various support structures on a much greater scale, and would therefore result in a much greater impact.

Rule 2410 Prevention of Significant Deterioration

As shown in Section VII.C.9 above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. A significant permit modification is defined as a “permit amendment that does not qualify as a minor permit modification or administrative amendment.”

A minor permit modification is a permit modification that does not meet the definition of modification as given in Section 111 or Section 112 of the Federal Clean Air Act. Since this project involves the installation of a new emission unit (new reactors) that is subject to an NSPS requirement (Subpart RRR), the proposed project is considered to be a modification under the Federal Clean Air Act. As a result, the proposed project constitutes a Significant Modification to the Title V Permit.

As discussed above, the facility has applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility shall not implement the changes requested until the final permit is issued.

Rule 4001 New Source Performance Standards (NSPS)

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. The equipment in this project may be subject to the subparts mentioned as explained below.

40 CFR Part 60, Subpart J (Standards of Performance for Petroleum Refineries) applies to Hydrocracker unit #21 (S-33-56) and Gas Plant 2 (S-33-124). Continued compliance is expected after the changes are made.

40 CFR Part 60, Subpart GGG (Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for which Construction, Reconstruction, or Modification Commenced after January 4, 1983, and on or Before November 7, 2006) applies to Hydrocracker unit #21 (S-33-56) and the relocated compressor from Unit 14 (Mild Hydrocracker) (previously identified as 14-C2 in PTO S-33-13). However, a relocation of a source does not constitute a “modification” under 40 CFR 60.14. Compliance is expected after the changes are made.

40 CFR Part 60, Subpart VVa (Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006) applies to components that are part of a process unit that commenced construction, reconstruction, or modification after November 7, 2006 and that produces one of the chemicals listed in 40 CFR 60.489. Propane, butanes, naphtha, and renewable diesel are not listed in 40 CFR 60.489, and therefore, no units in the project are subject to this subpart.

40 CFR Part 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) applies to components that are part of a process unit that commenced construction, reconstruction, or modification after November 7, 2006. Components include compressors, and the group of the following: valves, pumps, pressure relief devices, sampling connection systems, open-ended valves or lines, and flanges or other connectors in VOC service.

Facilities that are subject to Subpart GGG are excluded from Subpart GGGa. Additionally, this rule does not apply to the racks as they are not supporting petroleum refining operations; they are supporting the facility’s renewable fuels production process.

Gas Plant 2 (Unit 24) is an existing process unit, and applicability under NSPS Subpart GGGa needs to be evaluated. Modification means a physical change in, or change in the method of

operation of, and existing facility which increases the amount of any air pollutant emitted into the atmosphere or which results in the emission of any air pollutant into the atmosphere not previously emitted. The changes to gas plant 2 did not increase the amount of emissions or result in the emissions of any new air pollutant. Therefore, the gas plant was not modified by this project.

40 CFR Part 60, Subpart III (Standards of Performance for Volatile Organic Compound (VOC) Emissions From the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Processes) applies to air oxidation reactors that are part of a process unit that produces any of the chemicals listed in 40 CFR 60.617. There are no air oxidation reactors as part of this project, therefore this Subpart does not apply.

40 CFR Part 60, Subpart NNN (Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations) applies to new distillation units that are part of a process unit that produces any of the chemicals listed in 40 CFR 60.667. Propane, and mixed butanes are included in the list of applicable chemicals. Naphtha and renewable diesel are not included in the list of applicable chemicals.

The distillation units at the facility are the Deethanizer, the Debutanizer, the Depropanizer, the Low Pressure Absorber, and the Stripper. These are all existing emission units; so they are not subject to Subpart NNN.

40 CFR Part 60, Subpart RRR (Standards of Performance for Volatile Organic Compound Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Reactor Processes) applies to new reactors that are part of a process unit that produces any of the chemicals listed in 40 CFR 60.707 (chemicals affected by subpart RRR). Propane and mixed butanes are included in the list of applicable chemicals. Naphtha and renewable diesel are not included in the list of applicable chemicals. Thus, the new reactors 21-R101, R102, and R103 will be subject to this subpart.

§60.702 (Standards) states that the operator of any affected facility shall comply with paragraph (a), (b), or (c) of this section for each vent stream on and after the date on which the initial performance test required by §§60.8 and 60.704 is completed, but not later than 60 days after achieving the maximum production rate at which the affected facility will be operated, or 180 days after the initial start-up, whichever date comes first. Each owner or operator shall either:

(a) Reduce emissions of TOC (less methane and ethane) by 98 weight-percent, or to a TOC (less methane and ethane) concentration of 20 ppmv, on a dry basis corrected to 3 percent oxygen, whichever is less stringent. If a boiler or process heater is used to comply with this paragraph, then the vent stream shall be introduced into the flame zone of the boiler or process heater; or
(b) Combust the emissions in a flare that meets the requirements of §60.18; or
(c) Maintain a TRE index value greater than 1.0 without use of a VOC emission control device.

The facility will comply with the subpart by collecting all vent streams from each reactor and either burning them in a flare that meets the requirements of 40 CFR 60.18, or burning them as primary fuel in a heater, alone or in combination with additional fuel gas. All vent streams will be collected by the facility's vapor collection system. During normal operations gas from the vapor collection system is used as fuel gas in heaters 21H11 and/or 21 H12. If the heaters are unable to burn all of the collected gas (typically during process upset conditions), collected vapors are burned in the Area 2 High Pressure or Low Pressure Flares. The applicant proposes that any bypass line is secured in the closed position with a car-seal or lock-and-key type configuration.

Compliance with this subpart will be better assured with the following conditions on the ATC:

- All process vents from reactors 21-R101, 21-R102, and 21-R103 shall be routed to a flare or to a control device which reduces emissions of regulated material or TOC by at least 98 weight-percent or to a concentration of less than 20 parts per million by volume, whichever is less stringent. [40 CFR 60.702]

Because the vent stream will be combusted as primary fuel in a heater, temperature monitoring and initial performance testing of §60.703 is not required.

Pursuant to §60.705(s), the operator who seeks to demonstrate compliance with §60.702 (a) or (b) using a control device must maintain on file a schematic diagram of the affected vent streams, collection system(s), fuel systems, control devices, and bypass systems as part of the initial report. This schematic diagram must be retained for the life of the system.

The facility will maintain a schematic diagram of the affected vent streams, collection systems, control devices, and bypass systems.

Compliance with this subpart will be better assured with the following conditions on the ATC:

- All bypass lines in the closed vent system for the new reactors shall be secured in the non-diverting position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. [40 CFR 65.703]

- Owners or operators using boilers and process heaters to meet the 98 weight-percent emission reduction or 20 parts per million by volume outlet concentration requirement as specified in §60.702 shall introduce the vent stream into the flame zone of the boiler or process heater. The boiler or process heater shall be operated at all times when emissions are vented to them. [40 CFR 60.702]

- An initial performance test is not required to demonstrate compliance with the 98 weight-percent emission reduction or 20 parts per million by volume outlet concentration requirement when the vent stream is introduced with the primary fuel or is used as the primary fuel. [40 CFR 60.704(b)(6)]

- Temperature monitoring is not required for any boiler or process heater in which all vent streams are introduced with primary fuel or are used as the primary fuel. [40 CFR 60.703]

- For each closed vent system that contains bypass lines that could divert a vent stream away from the control device and to the atmosphere, the owner or operator shall keep a record that the monthly visual inspection of the seals or closure mechanisms has been done and shall record the occurrence of all periods when the seal mechanism is broken, the bypass line valve position has changed, or the key for a lock-and-key type lock has been checked out, and records of any car-seal that has been broken. [40 CFR 60.705]

Therefore, compliance with this subpart is expected.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63.

40 CFR Part 63, Subpart CC (National Emission Standards for Hazardous Air Pollutants From Petroleum Refineries) applies to petroleum refining process units that are located at a plant that is a major source per Section 112a of the Clean Air Act and emit one or more hazardous air pollutants per Table 1 of the subpart. The facility is not a major source of HAP, as such Subpart CC does not apply.

40 CFR Part 63, Subpart FFFF (National Emission Standards for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing) applies to miscellaneous organic chemical manufacturing process units that are located at a plant that is a major source per Section 112a of the Clean Air Act. The facility is not a major source of HAP, as such Subpart FFFF does not apply.

40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial for Institutional, Commercial, and Industrial Boilers and Process Heaters) applies to boilers and process heaters that are located at a plant that is a major source per Section 112a of the Clean Air Act. The facility is not a major source of HAP, as such Subpart DDDDD does not apply.

Rule 4101 Visible Emissions

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). Provided the equipment is properly maintained and operated, compliance with visible emissions limits is expected.

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification of an existing source shall not result in an increase in cancer risk greater than the District's significance level (20 in a million) and shall not result in acute and/or chronic risk indices greater than 1.

According to the Technical Services Memo for this project, the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The resulting prioritization score, acute hazard index, chronic hazard index, and cancer risk for this project is shown below.

Health Risk Assessment Summary	
	Worst Case Potential
Prioritization Score	0.02
Cancer Risk	0.0309 in a million
Acute Hazard Index	0.00
Chronic Hazard Index	0.00
T-BACT Required?	No

Discussion of T-BACT

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

In accordance with District policy APR 1905, no further analysis is required, and compliance with District Rule 4102 requirements is expected.

See Attachment I: Health Risk Assessment Summary

Rule 4311 Flares

The treated gas stream from the proposed acid gas treatment system will be a new stream directed to the Area 2 Low Pressure Flare (S-33-65). The gas stream is mostly inert, consisting of nitrogen, carbon dioxide, and water vapor with only trace amounts of hydrocarbons. The hydrogen sulfide and ammonia concentrations in the treated gas stream are 10 ppmv-H2S and 20 ppmv-NH3, respectively. Thus, directing the low volume of off-gas from this new gas treatment system to the flare is not modification of the flare.

The flares are currently subject to the operational requirements of Rule 4311 and will continue to be operated in compliance with the rule. An updated Flare Minimization Plan will be submitted pursuant to Section 6.5.3 prior to installing new equipment under this ATC.

Rule 4455 Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants

The fugitive components to be installed as part of this project will be subject to Rule 4455. Monitoring and repair will be performed in accordance with this rule. Future compliance is anticipated.

Rule 4624 Transfer of Organic Liquids

The purpose of this rule is to limit VOC emissions from the transfer of organic liquids. This rule shall apply to organic liquid transfer facilities as defined in this rule. “Organic liquid” is defined in Section 3.20 as any liquid which contains VOCs and has a TVP of 1.5 psia or greater at the storage container’s maximum organic liquid storage temperature.

This project include existing loading/unloading rack (S-33-401) that is being rebuilt with existing conditions shown to be in compliance with Rule 4624. This Rule 4624 discussion focuses on the new truck loading/unloading rack (S-33-451) that will also be subject to this rule. The new truck loading/unloading rack will load renewable naphtha from tanks connected to vapor recovery and will load renewable propane and renewable butane from permit-exempt pressure vessels. According to the applicant, the new rack will also be used to unload organic liquids from time to time. Vapors collected from transfer operations at this rack will be routed to the existing facility vapor recovery system. Up to 40 tanker trucks per day will be loaded/unloaded at the rack.

The applicant indicates that the new rack is a Class 1 organic liquid transfer facility under the rule, which is defined in Section 3.8 as any location transferring 20,000 gallons or more on any one day of organic liquids with a TVP of 1.5 psia or greater to or from tank trucks, trailers, or railroad tank cars.

Section 5.1 limits Class 1 organic liquid transfer facility to VOC emission from the transfer operation to 0.08 pounds per 1,000 gallons of organic liquid transferred and use one of the following systems:

5.1.1 An organic liquid loading operation shall be bottom loaded.
5.1.2 The VOC from the transfer operation shall be routed to:
- 5.1.2.1 A vapor collection and control system;
- 5.1.2.2 A fixed roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids);
- 5.1.2.3 A floating roof container that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or
- 5.1.2.4 A pressure vessel equipped with an APCO-approved vapor recovery system that meets the control requirements specified in Rule 4623 (Storage of Organic Liquids); or
- 5.1.2.5 A closed VOC emission control system.

Note that the applicant is proposing the use of a vapor control system and top loading drop tubes, which has been determined to be equivalent to bottom loading, as the discharge opening into a container is completely submerged below the level of the organic liquid in the container.

The following conditions will be placed on the permit to ensure compliance with this section:

- Operation shall include truck loading/unloading operation with disconnect, dry-break couplers, top loading drop tubes (equivalent to bottom loading). Vapor lines shall vent to shared vapor control system. [District Rules 2201 and 4624]

- Vapors from loading operations shall be directed to an existing vapor recovery system. [District Rule 2201]

- Organic liquid transfer shall be with vapor control such that VOC emissions do not exceed 0.015 lb per 1000 gallons of liquid loaded. [District Rules 4624, 5.1]

- All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.015 lb/1000 gallons loaded. [District Rule 4624, 5.5]

Section 5.2 only applies to Class 2 organic liquid transfer facilities.

Section 5.3 requires a transfer operation utilizing a closed VOC emission control system or utilizing a container that meets the control requirements of Rule 4623 (Storage of Organic Liquids) to meet the emission control requirements of this rule shall demonstrate compliance with Sections 5.1 and 5.2 by complying with the leak inspection requirements of Section 5.9.

The proposed transfer operation will use a closed VOC emission control system, so the operator shall meet the requirements of Section 5.1 by complying with the requirements of Section 5.9 as discussed in the Section 5.9 discussion below.

Section 5.4 requires the vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and six (6) inches water column vacuum. This section shall not apply to the transfer of liquefied petroleum gas (which includes butane and propane).

Compliance with this section is ensured with the following condition:

- The vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. This requirement shall not apply to the transfer of liquefied petroleum gas, butane, and propane. [District Rule 4624, 5.4]

Section 5.5 states that all delivery tanks which previously contained organic liquids with a TVP of 1.5 psia or greater at the storage container's maximum organic liquid storage temperature shall be filled only at transfer facilities satisfying Sections 5.1, 5.2, or 5.4, as applicable.

Compliance with this section is ensured with the following condition:

- All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.015 lb/1000 gallons loaded. [District Rule 4624, 5.5]

Section 5.6 states that the transfer rack and vapor collection equipment shall be designed, installed, maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections.

Compliance with this section is ensured with the following condition:

- Transfer and vapor collection equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at the surface of the component interface from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mL, per average of 3 consecutive disconnects. [District Rule 4624, 5.6]

Section 5.7 states that the construction of any new top loading facility or the reconstruction, as defined in 40 CFR 60.15, or the expansion of any existing top loading facility with top loading equipment shall not be allowed.

Compliance with this section is ensured with the following condition:

- The construction of any new top loading facility or the reconstruction, as defined in 40 CFR 60.15, or the expansion of any existing top loading facility with top loading equipment shall not be allowed. [District Rule 4624, 5.7]

Section 5.8 does not apply as it applies to facilities handling exclusively handling liquefied petroleum gas.

Section 5.9 specifies the following leak inspection requirements:

5.9.1 The operator of an organic liquid transfer facility shall inspect the vapor collection system, the vapor disposal system, and each transfer rack handling organic liquids for leaks during transfer at least once every calendar quarter using the test method prescribed in Section 6.3.8.

5.9.2 A floating roof container that meets the applicable control requirements of Section 5.0 of Rule 4623 (Storage of Organic Liquids) shall be considered not leaking for the purposes of this section.

5.9.3 All equipment that are found leaking shall be repaired or replaced within 72 hours. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement.

5.9.4 An operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during the inspections required under provisions of Sections 5.9.1 and 5.9.2 during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection the frequency would revert back to quarterly and the operator shall contact the APCO in writing within 14 days.

Compliance with this section is ensured with the following conditions:

- The operator shall inspect the transfer rack vapor collection and control system and each transfer rack handling organic liquids for leaks during transfer at least once every calendar quarter using the EPA Method 21. [District Rule 4624, 5.9.1]

- Each leaking component shall be repaired or replaced within 72 hours after detection. If the leaking component cannot be repaired or replaced within 72 hours, it shall be taken out of service until such time as it is repaired or replaced. Components taken out of service shall be repaired or replaced within 15 calendar days of leak detection. [District Rule 4624, 5.9.3]

- For an organic liquid transfer facility, an operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection, the inspection frequency shall revert back to quarterly, and the operator shall contact the APCO in writing within 14 days. [District Rule 4624, 5.9.4]

Section 6.1 list the recordkeeping requirements. The following are the applicable requirements:

6.1.3 An operator subject to any part of Section 5.0 shall keep records of daily liquid throughput and the results of any required leak inspections.
6.1.4 Records required under Sections 6.1.1, 6.1.2, 6.1.3 shall be retained for a minimum of five years and shall be made readily available to the APCO, ARB, or EPA during normal business hours and submitted upon request to the APCO, ARB, or EPA.

Compliance with this section is ensured with the following conditions:

- The permittee shall keep records of daily liquid throughput and maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired), and E) inspector name and signature. [District Rule 2520, 9.3.2 and 4624, 6.1.3]

- All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 4624]

Section 6.2 lists compliance testing requirements. Section 6.2.1 requires Class 1 or Class 2 operator to perform an initial source test of the VOC emission control system. However, Section 6.2.1.2 states that the source testing requirements of Section 6.2.1 shall not apply to any Class 1 or Class 2 organic liquid transfer facility equipped with a closed VOC control system. Because the facility will control emissions with a closed VOC control system, source testing is not required.

Section 6.3 lists the approved test methods.

- VOC emissions shall be determined annually using 40CFR 60.503 Test Methods and Procedures, and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Test Procedure TP-203.1. [District Rule 4624, 6.3.2]

- Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4624, 6.3.8]

- Equivalent test methods other than specified in Sections 6.4.1 through 6.4.5 may be used provided such test methods have received prior approval from the US EPA, ARB, and APCO. [District Rule 4624, 6.3.9]

Therefore, compliance with this rule is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

<u>District is a Responsible Agency</u>

It is determined that another agency has prepared an environmental review document for the project. The District is a Responsible Agency for the project because of its discretionary approval power over the project via its Permits Rule (Rule 2010) and New Source Review Rule (Rule 2201), (CEQA Guidelines §15381). As a Responsible Agency, the District is limited to mitigating or avoiding impacts for which it has statutory authority. The District does not have statutory authority for regulating greenhouse gas emissions. The District has determined that the applicant is responsible for implementing greenhouse gas mitigation measures, if any, imposed by the Lead Agency.

District CEQA Findings

The County of Kern (County) is the public agency having principal responsibility and served as the Lead Agency for approving the project covered under this ATC project. The County identified the Project as “Minor Modification No.2 to Precise Development Plan No. 62, Map No. 102; Precise Development Plan No.21, Map No. 102-14; Precise Development Plan No.18, Map No. 102-15; and Precise Development Plan No.1, Map No. 102-23. The County determined the Project to be exempt from CEQA according to the Public Resources Code Sections 21080 (b)(1) and CEQA Guidelines §15268 (Ministerial Projects). Consistent with CEQA Guidelines §15062 a Notice of Exemption was prepared and adopted by the County in July 2019.

The District is a Responsible Agency for the project because of its discretionary approval power over the project via its Permits Rule (Rule 2010) and New Source Review Rule (Rule 2201), (CEQA Guidelines §15381). The District's engineering evaluation of the project (this document) demonstrates that compliance with District rules and permit conditions would reduce Stationary Source emissions from the project to levels below the District's significance thresholds for criteria pollutants. The District has determined that no additional findings are required (CEQA Guidelines §15096(h)).

Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit is based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

The criteria pollutant emissions and toxic air contaminant emissions associated with the proposed project are not significant, and there is minimal potential for public concern for this particular type of facility/operation. Therefore, an Indemnification Agreement and/or a Letter of Credit will not be required for this project in the absence of expressed public concern.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue ATCs S-33-56-34, '-63-15, '-124-14, '-401-4, and '-451-0 subject to the permit conditions on the attached draft ATC in Appendix A.

X. Billing Information

Annual Permit Fees			
Permit Number	**Fee Schedule**	**Fee Description**	**Annual Fee**
S-33-56-34	3020-02-H	271.4 MMBtu/hr	$1,238
S-33-63-15	3020-01-F	596 hp electric motors	$731
S-33-124-14	3020-01-E	249 hp electric motors	$495
S-33-401-4	3020-01-D	105 hp electric motors	$379
S-33-451-0	3020-06	Miscellaneous [9]	$128

[9] The applicant has confirmed that the loading rack -451 is not equipped with its own pumps like -401. The electric pumps pushing the liquids handled by the rack are located with the liquid storage pressure vessels. Therefore, -451 will be billed under the miscellaneous billing schedule.

Appendixes

A*:* Draft Authorities to Construct
B: Current Permits to Operate (or Outstanding ATC Serving as Base Document)
C: VOC Analysis of Acid Gas Removal System Stream
D: Fugitive Emission Calculations
E: Compliance Certification
F: SSPE Calculations
G: BACT Guideline
H: BACT Analysis
I: HRA Summary
J: Quarterly Net Emissions Change
K: ERC Withdrawal Calculations
L: Surplus ERC Analysis

APPENDIX A
Draft Authorities to Construct

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-33-56-34 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ALON BAKERSFIELD REFINING
MAILING ADDRESS: P O BOX 152 (AREA 1 & 2)
BAKERSFIELD, CA 93302-0152

LOCATION: 6451 ROSEDALE HWY (AREA 1 & 2)
BAKERSFIELD, CA 93308

SECTION: 28 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:
MODIFICATION OF HYDROCRACKER UNIT #21 INCLUDING 9 HEATERS, CATALYTIC ASSEMBLY, AND MISC AIR COOLERS, EXCHANGERS , DRUMS, AND PUMPS - AREA 2: INSTALL 3 REACTORS, HIGH PRESSURE SEPARATOR, EXCHANGERS, VESSELS, HIGH PRESSURE MEMBRANE SKID, PUMPS, LEAN OIL ABSORBER, ELECTRICALLY-DRIVEN COMPRESSOR, REMOVE EXISTING HEAT EXCHANGERS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) S-33-56-33 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

5. Hydrocracker unit shall include two 40.0 MMBtu/hr charge heaters (21H11 and 21H12), two 18.1 MMBtu/hr heaters (21H13 and 21H14), two 11.4 MMBtu/hr heaters (21H15 and 21H16), one 27.8 MMBtu/hr heater (21H17), one 34.6 MMBtu/hr heater (21H18), one 65.0 MMBtu/hr heater (21H20), catalytic assembly, miscellaneous air coolers, heat exchangers, drums, pumps, piping, and vessels. [District Rule 2201] Federally Enforceable Through Title V Permit

6. Firing rate of heater 21H20 shall not exceed 65.0 MMBtu/hr. [District Rules 2201and 4306] Federally Enforceable Through Title V Permit

7. Continuous records of heater 21H20's firing rate, including volumetric fuel consumption rate (corrected for temperature) and hhv of fuel burned shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit

8. VOC emission rate from fugitive components associated with this emissions unit shall not exceed 43.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

9. A component shall be considered leaking if one or more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of Rule 4455 exist at the facility. For this permit unit, except for pumps and compressors, a minor gas leak shall be defined for any component listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service as a reading in excess of 100 ppmv above background up to and including a reading of 10,000 ppmv above background. For pumps, compressors and other component types not specifically listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service, a minor gas leak shall be defined as a reading in excess of 500 ppmv above background up to and including a reading of 10,000 ppmv above background. Readings shall be taken as methane using a portable hydrocarbon detection instrument and shall be made in accordance with the methods specified in Section 6.4.1 of Rule 4455. [District Rule 2201 and District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

10. Permit holder shall maintain accurate component count and resultant emissions according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-3a (Feb 1999), Correlation Equations Method. Permit holder shall update such records when new components are approved and installed. Components shall be screened and leak rate shall be measured in accordance with the frequency of inspection specified in Rule 4455 as applicable. [District Rule 2201] Federally Enforceable Through Title V Permit

11. Except during startup and shutdown, heater 21H18 emission rates shall not exceed the following: NOx (as NO2) 0.036 lb/MMBtu or 30 ppmvd @ 3% O2, CO: 0.075 lb/MMBtu or 100 ppmv @ 3% O2, VOC: 0.005 lb/MMBtu, and PM10: 0.014 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

12. Heater 21H20 emission rates shall not exceed NOx (as NO2): 0.036 lb/MMBtu or 30 ppmv @ 3% O2, and CO: 400 ppmv @ 3% O2. [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

13. Except during startup and shutdown, heater 21H11 emission rates shall not exceed NOx (as NO2) 30 ppmvd @ 3% O2, CO: 100 ppmvd @ 3% O2, VOC: 0.003 lb/MMBtu, and PM10: 0.014 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

14. Except during startup and shutdown, heater 21H12 emission rates shall not exceed any of the following: NOx (as NO2): 30 ppmv @ 3% O2, CO: 100 ppmvd @ 3% O2, VOC: 0.003 lb/MMBtu, PM10: 0.014 lb/MMBtu, or SOx (as SO2): 0.0286 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

15. Except during startup and shutdown, heaters 21H13 through 21H17 emission rates shall not exceed: NOx (as NO2): 0.036 lb/MMBtu or 30 ppmvd @ 3% O2, CO: 400 ppmvd @ 3% O2, VOC: 0.0055 lb/MMBtu, PM10: 0.0076 lb/MMBtu, or SOx (as SO2): 0.0286 lb/MMBtu. [District Rules 2201, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

16. Emission rates from heater 21H11 shall not exceed any of the following: PM10: 13.4 lb/day, SOx (as SO2): 27.5 lb/day, VOC: 2.9 lb/day, NOx (as NO2): 34.6 lb/day, or CO: 72.0 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit

17. Emission rates from heater 21H12 shall not exceed any of the following: PM10: 13.4 lb/day, SOx (as SO2): 27.5 lb/day, VOC: 2.9 lb/day, NOx (as NO2): 34.6 lb/day, or CO: 72.0 lb/day [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

18. Emission rates from heater 21H13 shall not exceed any of the following: PM10: 3.3 lb/day, SOx (as SO2): 12.4 lb/day, VOC: 2.4 lb/day, NOx (as NO2): 36.9 lb/day or 5,694 lb/year, or CO: 130.3 lb/day or 10,655 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

19. Emission rates from heater 21H14 shall not exceed any of the following: PM10: 3.3 lb/day, SOx (as SO2): 12.4 lb/day, VOC: 2.4 lb/day, NOx (as NO2): 36.9 lb/day or 5,694 lb/year, or CO: 130.3 lb/day or 10,655 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

20. Emission rates from heater 21H15 shall not exceed any of the following: PM10: 2.1 lb/day, SOx (as SO2): 7.8 lb/day, VOC: 1.5 lb/day, NOx (as NO2): 23.3 lb/day or 3,577 lb/year, or CO: 82.1 lb/day or 6,711 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

21. Emission rates from heater 21H16 shall not exceed any of the following: PM10: 2.1 lb/day, SOx (as SO2): 7.8 lb/day, VOC: 1.5 lb/day, NOx (as NO2): 23.3 lb/day or 3,577 lb/year, or CO: 82.1 lb/day or 6,711 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

22. Emission rates from heater 21H17 shall not exceed any of the following: PM10: 5.1 lb/day, SOx (as SO2): 19.1 lb/day, VOC: 3.3 lb/day, NOx (as NO2): 56.7 lb/day or 8,760 lb/year, or CO: 200.2 lb/day or 16,365 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

23. Emission rates from heater 21H18 shall not exceed any of the following: PM10: 6.3 lb/day, SOx (as SO2): 23.7 lb/day, VOC: 4.2 lb/day, NOx (as NO2): 70.6 lb/day, or CO: 62.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

24. For heater 21H11 through 21H18, duration of start-up and shutdown shall not exceed 2 hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

25. If the unit's actual fugitive exceed 14,819 lb VOCs per calendar year the permittee must report to the District the annual VOC emissions as calculated pursuant to paragraph 40 CFR 51.165(a)(6)(iii) and any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection. Such information must be submitted to the District for a period of 5 calendar years beginning the year of operation under ATC S-33-56-32 and shall be submitted within 60 days of the end of each calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit

26. Permittee shall maintain records of duration of each start-up and shutdown for a period of five years and make such records readily available for District inspection upon request. [District Rules 2080, 4305, and 4306] Federally Enforceable Through Title V Permit

27. For heaters 21H13, 21H14, 21H15, 21H16, and 21H17, compliance with annual CO emission rate shall be determined by using CO emission concentrations obtained during monthly monitoring as required in this permit, fuel use, fuel heating value, and stack gas flow rate. Records of calculated CO emissions shall be maintained for a period of five years and made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

28. For each heater, permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

29. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

30. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

31. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

32. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306 (amended October 16, 2008). [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

33. Source testing to measure natural gas-combustion NOx and CO emissions from each heater shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

35. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

36. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

37. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4351] Federally Enforceable Through Title V Permit

38. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

39. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

40. Permittee shall meet all applicable NSPS requirements, including Subparts A, J and GGG. [NSPS 40 CFR Part 60, Subparts A & J] Federally Enforceable Through Title V Permit

41. Permittee shall maintain records of hhv of fuel burned and cumulative annual fuel use for a period of five years and shall make such records readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

42. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit

43. Sulfur content (as H2S) of fuel supplied to all heaters shall not exceed 0.1 gr/dscf (162 ppmv) based on a three hour rolling average and shall be continuously monitored and recorded. [NSPS 40 CFR Part 60, Subparts A & J] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

44. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

45. {588} Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

46. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit

47. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

48. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6B; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

49. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

50. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 4305, 6.2.1; 4306, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit

51. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 4801 and Kern County Rule 407] Federally Enforceable Through Title V Permit

52. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2] Federally Enforceable Through Title V Permit

53. Operators shall not depressurize any vessel containing VOCs unless the process unit turnaround is accomplished by employing one of the following operating procedures: The organic vapors shall either be recovered, added to the refinery fuel gas system and combusted; or controlled and piped to an appropriate firebox or incinerated for combustion; or flared, until the pressure within the process vessel is as close to atmospheric pressure as is possible. All process vessels shall be depressurized into the control facilities to less than 1020 mm Hg (5 psig) before venting/opening to atmosphere. All organic compounds which emerge from a refinery process vessel during the purging of said vessel and which otherwise would be emitted to the atmosphere shall be either directed to a flare or incinerator or shall be used for fuel until such disposition of emissions is not technically feasible or is less safe than atmospheric venting. [District Rule 4454, 4.0] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

54. The owner or operator may apply to the Administrator for a determination of equivalency for any means of emission limitation that achieves a reduction in emissions of VOC at least equivalent to the reduction in emissions of VOC achieved by the controls required in Subpart GGG. In doing so, the owner or operator shall comply with the requirements of 40 CFR 60.484. [40 CFR 60.592(c)] Federally Enforceable Through Title V Permit

55. Each pump in light liquid service (PLLS) shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485(b), except as provided in 40 CFR 60.482-1(c) and 40 CFR 60.482-2(d), (e), and (f). Each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. A leak is detected if an instrument reading of 10,000 ppm or greater is measured or if there are indications of liquids dripping from the pump seal. [40 CFR 60.482-2(a) and (b)] Federally Enforceable Through Title V Permit

56. When a leak is detected for each PLLS, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [40 CFR 60.482-2(c)] Federally Enforceable Through Title V Permit

57. Each PLLS equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of 40 CFR 60.482-2(a) provided the requirements specified in 40 CFR 60.482-2(d)(1) through (6) are met. [40 CFR 60.482(d)] Federally Enforceable Through Title V Permit

58. Any PLLS that is designated, as described in 40 CFR 60.486(e)(1) and (2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of 40 CFR 60.482-2(a), (c), and (d) if the pump meets the requirements specified in 40 CFR 60.482-2(e)(1), (2), and (3). [40 CFR 60.482-2(e)] Federally Enforceable Through Title V Permit

59. If any PLLS is equipped with a closed vent system capable of capturing and transporting leakage from the seal or seals to a control device that complies with the requirements of 40 CFR 60.482-10, it is exempt from the requirements of 40 CFR 60.482-2(a) through (e). [40 CFR 60.482-2(f)] Federally Enforceable Through Title V Permit

60. Any pump in PLLS that is designated, as described in 40 CFR 60.486(f)(1), as an unsafe-to-monitor pump is exempt from the monitoring and inspection requirements of 40 CFR 60.482-2(a) and 40 CFR 60.482-2(d)(4) through (6) if: 1). The owner or operator of the pump demonstrates that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 60.482-2(a); and 2) The owner or operator of the pump has a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment according to the procedures in 40 CFR 60.482-2(c) if a leak is detected. [40 CFR 60.482-2(g)] Federally Enforceable Through Title V Permit

61. Any pump that is located within the boundary of an unmanned plant site is exempt from the weekly visual inspection requirement of 40 CFR 60.482-2(a)(2) and (d)(4) and the daily requirements of 40 CFR 60.482-2(d)(5), provided that each pump is visually inspected as often as practicable and at least monthly. [40 CFR 60.482-2(h)] Federally Enforceable Through Title V Permit

62. Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determined by the methods specified in 40 CFR 60.485(c). [40 CFR 60.482-4(a)] Federally Enforceable Through Title V Permit

63. After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after the pressure release, except as provided in 40 CFR 60.482-9. No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, by the methods specified in 40 CFR 60.485(c). [40 CFR 60.482-4(b)] Federally Enforceable Through Title V Permit

64. Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device as described in 40 CFR 60.482-10 is exempted from the requirements of 40 CFR 60.482-4(a) and (b). [40 CFR 60.482-4(c)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

65. Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the 40 CFR 60.482-4(a) and (b), provided the owner or operator complies with the requirements in 40 CFR 60.482-4(d)(2) of this section. After each pressure release, a new rupture disk shall be installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 60.482-9. [40 CFR 60.482-4(d)] Federally Enforceable Through Title V Permit

66. Except for in-situ sampling systems and sampling systems without purges, each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 60.482-1(c). Each closed-purge, closed-loop, or closed-vent system shall comply with the requirements specified in 40 CFR 60.482-5(b)(1), (2), (3), and (4). [40 CFR 60.482-5(a), (b), and (c)] Federally Enforceable Through Title V Permit

67. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 60.482-1(c). The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with this condition at all other times. [40 CFR 60.482-6(a) and (c)] Federally Enforceable Through Title V Permit

68. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. [40 CFR 60.482-6(b)] Federally Enforceable Through Title V Permit

69. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of 40 CFR 60.482-6(a), (b) and (c). [40 CFR 60.482-6(d)] Federally Enforceable Through Title V Permit

70. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in 40 CFR 60.482-6(a) through (c) are exempt from the requirements of 40 CFR 60.482-6(a) through (c). [40 CFR 60.482-6(e)] Federally Enforceable Through Title V Permit

71. Each valve in gas/vapor service and in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485(b) and shall comply with 40 CFR 60.482-7(b) through (e), except as provided in 40 CFR 60.482-7(f), (g), and (h), 40 CFR 60.483-1, 40 CFR 60.483-2, and 40 CFR 60.482-1(c). A leak is detected if an instrument reading of 10,000 ppm or greater is measured. [40 CFR 60.482-7(a) and (b)] Federally Enforceable Through Title V Permit

72. Any valve in gas/vapor service or in light liquid service for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months. [40 CFR 60.482-7(c)] Federally Enforceable Through Title V Permit

73. When a leak is detected for any valve in gas/vapor service or in light liquid service, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 60.482-9. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the best practices specified in 40 CFR 60.482-7(e)(1), (2), (3), and (4), where practicable. [40 CFR 60.482-7(d) and (e)] Federally Enforceable Through Title V Permit

74. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486(e)(2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of 40 CFR 60.482-7(a) if the valve meets the requirements specified in 40 CFR 60.482-7(f)(1), (2), and (3). [40 CFR 60.482-7(f)] Federally Enforceable Through Title V Permit

75. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486(f)(1), as an unsafe-to-monitor valve is exempt from the requirements of 40 CFR 60.482-7(a) if: 1) The owner or operator of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 60.482-7(a); and 2) The owner or operator of the valve adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times. [40 CFR 60.482-7(g)] Federally Enforceable Through Title V Permit

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76. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486(f)(2), as a difficult-to-monitor valve is exempt from the requirements of 40 CFR 60.482-7(a) if: 1) The owner or operator of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface; 2) The process unit within which the valve is located either becomes an affected facility through 40 CFR 60.14 or 40 CFR 60.15 or the owner or operator designates less than 3.0 percent of the total number of valves as difficult-to-monitor; and 3) The owner or operator of the valve follows a written plan that requires monitoring of the valve at least once per calendar year. [40 CFR 60.482-7(h)] Federally Enforceable Through Title V Permit

77. The owner or operator may elect to comply with the applicable provisions for valves in gas/vapor service and in light liquid service as specified in 40 CFR 60.483-1 and 60.483-2. [40 CFR 60.592(b)] Federally Enforceable Through Title V Permit

78. If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, the owner or operator shall follow either one of the following procedures: 1) The owner or operator shall monitor the equipment within 5 days by the method specified in 40 CFR 60.485(b) and shall comply with the requirements of 40 CFR 60.482-8(b) through (d); or 2) The owner or operator shall eliminate the visual, audible, olfactory, or other indication of a potential leak. A leak is detected if an instrument reading of 10,000 ppm or greater is measured. [40 CFR 60.482-8(a) and (b)] Federally Enforceable Through Title V Permit

79. When a leak is detected in pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the best practices described under 40 CFR 60.482-7(e). [40 CFR 60.482-8(c) and (d)] Federally Enforceable Through Title V Permit

80. For closed vent systems and control devices, vapor recovery systems shall be designed and operated to recover the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent. [40 CFR 60.482-10(b)] Federally Enforceable Through Title V Permit

81. For closed vent systems and control devices, enclosed combustion devices shall be designed and operated to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 degrees C. [40 CFR 60.482-10(c)] Federally Enforceable Through Title V Permit

82. Flares used to comply with Subpart GGG shall comply with the requirements of 40 CFR 60.18. [40 CFR 60.482-10(d)] Federally Enforceable Through Title V Permit

83. Owners or operators of control devices used to comply with the provisions of Subpart GGG shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs. [40 CFR 60.482-10(e)] Federally Enforceable Through Title V Permit

84. Except as provided in 40 CFR 60.482-10(i) through (k), each closed vent system used to comply with the provisions of Subpart GGG shall be inspected according to the procedures and schedule specified in 40 CFR 60.482-10(f)(1) and (f)(2). Leaks, as indicated by an instrument reading greater than 500 parts per million by volume above background or by visual inspections, shall be repaired as soon as practicable except as provided in 40 CFR 60.482-10(h). A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. Repair shall be completed no later than 15 calendar days after the leak is detected. [40 CFR 60.482-10(f) and (g)] Federally Enforceable Through Title V Permit

85. Delay of repair of a closed vent system for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next process unit shutdown. [40 CFR 60.482-10(h)] Federally Enforceable Through Title V Permit

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86. If a vapor collection system or closed vent system is operated under a vacuum, it is exempt from the inspection requirements of 40 CFR 60.482-10(f)(1)(i) and (f)(2). [40 CFR 60.482-10(i)] Federally Enforceable Through Title V Permit

87. Any parts of the closed vent system that are designated, as described in 40 CFR 60.482-10(l)(1), as unsafe to inspect are exempt from the inspection requirements of 40 CFR 60.482-10(f)(1)(i) and (f)(2) if they comply with the requirements specified in 40 CFR 60.482-10 (j)(1) and (j)(2). [40 CFR 60.482-10(j)] Federally Enforceable Through Title V Permit

88. Any parts of the closed vent system that are designated, as described in 40 CFR 60.482-10(l)(2), as difficult to inspect are exempt from the inspection requirements of 40 CFR 60.482-10(f)(1)(i) and (f)(2) if they comply with the requirements specified in 40 CFR 60.482-10(k)(1) through (k)(3). [40 CFR 60.482-10(k)] Federally Enforceable Through Title V Permit

89. The owner or operator shall record the following information: 1) Identification of all parts of the closed vent system that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment; 2) Identification of all parts of the closed vent system that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment; 3) For each inspection during which a leak is detected, a record of the information specified in 40 CFR 60.486(c); 4) For each inspection conducted in accordance with 40 CFR 60.485(b) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected; and 5) For each visual inspection conducted in accordance with 40 CFR 60.482-10(f)(1)(ii) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 60.482-10(l)] Federally Enforceable Through Title V Permit

90. Closed vent systems and control devices used to comply with provisions Subpart GGG shall be operated at all times when emissions may be vented to them. [40 CFR 60.482-10(m)] Federally Enforceable Through Title V Permit

91. In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in 40 CFR 60, Appendix A or other methods and procedures as specified in 40 CFR 60.485, except as provided in 40 CFR 60.8(b). [40 CFR 60.485(a)] Federally Enforceable Through Title V Permit

92. The owner or operator shall determine compliance with the standards in 40 CFR 60.482, 60.483, and 60.484 as follows: Method 21 shall be used to determine the presence of leaking sources. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21. The following calibration gases shall be used: (i) Zero air (less than 10 ppm of hydrocarbon in air); and (ii) A mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [40 CFR 60.485(b)] Federally Enforceable Through Title V Permit

93. The owner or operator shall determine compliance with the no detectable emission standards in 40 CFR 60.482-2(e), 60.482-3(i), 60.482-4, 60.482-7(f), and 60.482-10(e) as follows: 1) The requirements of 40 CFR 60.485(b) shall apply. 2) Method 21 shall be used to determine the background level. All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm for determining compliance. [40 CFR 60.485(c)] Federally Enforceable Through Title V Permit

94. The owner or operator shall test each piece of equipment unless demonstrated that a process unit is not in VOC service, i.e., that the VOC content would never be reasonably expected to exceed 10 percent by weight. For purposes of this demonstration, the following methods and procedures shall be used: 1) Procedures that conform to the general methods in ASTM E260-73, 91, or 96, E168-67, 77, or 92, E169-63, 77, or 93 (incorporated by reference as seen in 40 CFR 60.17) shall be used to determine the percent VOC content in the process fluid that is contained in or contacts a piece of equipment; 2) Organic compounds that are considered by the Administrator to have negligible photochemical reactivity may be excluded from the total quantity of organic compounds in determining the VOC content of the process fluid; and 3) Engineering judgment may be used to estimate the VOC content, if a piece of equipment had not been shown previously to be in service. If the Administrator disagrees with the judgment, the previous two procedures as specified in 40 CFR 60.485(d)(1) and (2) shall be used to resolve the disagreement. [40 CFR 60.485(d)] Federally Enforceable Through Title V Permit

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95. The owner or operator shall demonstrate that an equipment is in light liquid service by showing that all the following conditions apply: 1) The vapor pressure of one or more of the components is greater than 0.3 kPa at 20 degrees C (1.2 in. H2O at 68 degrees F). Standard reference texts or ASTM D2879-83, 96, or 97 (incorporated by reference as seen in 40 CFR 60.17) shall be used to determine the vapor pressures; 2) The total concentration of the pure components having a vapor pressure greater than 0.3 kPa at 20 degrees Celsius is equal to or greater than 20 percent by weight; and 3) The fluid is a liquid at operating conditions. [40 CFR 60.485(e)] Federally Enforceable Through Title V Permit

96. Samples used in conjunction with 40 CFR 60.485(d), (e), and (g) shall be representative of the process fluid that is contained in or contacts the equipment or the gas being combusted in the flare. [40 CFR 60.485(f)] Federally Enforceable Through Title V Permit

97. The owner or operator shall determine compliance with the standards of flares as specified in 40 CFR 60.485(g)(1), (2), (3), (4), (5), (6), and (7). [40 CFR 60.485(g)] Federally Enforceable Through Title V Permit

98. An owner or operator of more than one affected facility subject to the provisions Subpart GGG may comply with the recordkeeping requirements for these facilities in one recordkeeping system if the system identifies each record by each facility. [40 CFR 60.486(a)] Federally Enforceable Through Title V Permit

99. When each leak is detected as specified in 40 CFR 60.482-2, 60.482-3, 60.482-7, 60.482-8, and 60.483-2, the following requirements apply: 1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment; 2) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in 40 CFR 60.482-7(c) and no leak has been detected during those 2 months; and 3) The identification on equipment except on a valve, may be removed after it has been repaired. [40 CFR 60.486(b)] Federally Enforceable Through Title V Permit

100. When each leak is detected as specified in 40 CFR 60.482-2, 60.482-3, 60.482-7, 60.482-8, and 60.483-2, the following information shall be recorded in a log and shall be kept for 5 years in a readily accessible location: 1) The instrument and operator identification numbers and the equipment identification number; 2) The date the leak was detected and the dates of each attempt to repair the leak; 3) Repair methods applied in each attempt to repair the leak; 4) ``Above 10,000" if the maximum instrument reading measured by the methods specified in 40 CFR 60.485(a) after each repair attempt is equal to or greater than 10,000 ppm; 5) ``Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak; 6) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown; 7) The expected date of successful repair of the leak if a leak is not repaired within 15 days; 8) Dates of process unit shutdown that occur while the equipment is unrepaired; and 9) The date of successful repair of the leak. [40 CFR 60.486(c) and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

101. The following information pertaining to the design requirements for closed vent systems and control devices described in 40 CFR 60.482-10 shall be recorded and kept in a readily accessible location: 1) Detailed schematics, design specifications, and piping and instrumentation diagrams; 2) The dates and descriptions of any changes in the design specifications; 3) A description of the parameter or parameters monitored, as required in 40 CFR 60.482-10(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring; 4) Periods when the closed vent systems and control devices required in 40 CFR 60.482-2, 60.482-3, 60.482-4, and 60.482-5 are not operated as designed, including periods when a flare pilot light does not have a flame; and 5) Dates of startups and shutdowns of the closed vent systems and control devices required in 40 CFR 60.482-2, 60.482-3, 60.482-4, and 60.482-5. [40 CFR 60.486(d)] Federally Enforceable Through Title V Permit

102. The following information pertaining to all equipment subject to the requirements in 40 CFR 60.482-1 to 60.482-10 shall be recorded in a log that is kept in a readily accessible location: 1) A list of identification numbers for equipment subject to the requirements of Subpart GGG; 2) (i) A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of 40 CFR 60.482-2(e), 60.482-3(i) and 60.482-7(f). (ii) The designation of equipment as subject to the requirements of 40 CFR 60.482-2(e), 60.482-3(i) and 60.482-7(f) shall be signed by the owner or operator; 3) A list of equipment identification numbers for pressure relief devices required to comply with 60.482-4; 4) (i) The dates of each compliance test as required in 40 CFR 60.482-2(e), 60.482-3(i), 60.482-4, and 60.482-7(f). (ii) The background level measured during each compliance test. (iii) The maximum instrument reading measured at the equipment during each compliance test; and 5) A list of identification numbers for equipment in vacuum service. [40 CFR 60.486(e)] Federally Enforceable Through Title V Permit

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103. The following information pertaining to all valves subject to the requirements of 40 CFR 60.482-7(g) and (h) and to all pumps subject to the requirements of 40 CFR 60.482-2(g) shall be recorded in a log that is kept in a readily accessible location: 1) A list of identification numbers for valves and pumps that are designated as unsafe-to-monitor, an explanation for each valve or pump stating why the valve or pump is unsafe-to-monitor, and the plan for monitoring each valve or pump; and 2) A list of identification numbers for valves that are designated as difficult-to-monitor, an explanation for each valve stating why the valve is difficult-to-monitor, and the schedule for monitoring each valve. [40 CFR 60.486(f)] Federally Enforceable Through Title V Permit

104. The following information shall be recorded for valves complying with 40 CFR 60.483-2: 1) A schedule of monitoring; 2) The percent of valves found leaking during each monitoring period. [40 CFR 60.486(g)] Federally Enforceable Through Title V Permit

105. The following information shall be recorded in a log that is kept in a readily accessible location: 1) Design criterion required in 40 CFR 60.482-2(d)(5) and 60.482-3(e)(2) and explanation of the design criterion; and 2) Any changes to this criterion and the reasons for the changes. [40 CFR 60.486(h)] Federally Enforceable Through Title V Permit

106. The following information shall be recorded in a log that is kept in a readily accessible location for use in determining exemptions as provided in 40 CFR 60.480(d): 1) An analysis demonstrating the design capacity of the affected facility; 2) A statement listing the feed or raw materials and products from the affected facilities and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol; and 3) An analysis demonstrating that equipment is not in VOC service. [40 CFR 60.486(i)] Federally Enforceable Through Title V Permit

107. Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location. [40 CFR 60.486(j)] Federally Enforceable Through Title V Permit

108. The provisions of 40 CFR 60.7 (b) and (d) do not apply to affected facilities subject to Subpart GGG. [District 40 CFR 60.486(k)] Federally Enforceable Through Title V Permit

109. All semiannual reports to the Administrator shall include the following information, summarized from the information in 40 CFR 60.486: 1) Process unit identification; 2) For each month during the semiannual reporting period, i) Number of valves for which leaks were detected as described in 40 CFR 60.482-7(b) or 40 CFR 60.483-2, (ii) Number of valves for which leaks were not repaired as required in 40 CFR 60.482-7(d)(1), (iii) Number of pumps for which leaks were detected as described in 40 CFR 60.482-2(b) and (d)(6)(i), (iv) Number of pumps for which leaks were not repaired as required in 40 CFR 60.482-2(c)(1) and (d)(6)(ii), (v) Number of compressors for which leaks were detected as described in 40 CFR 60.482-3(f), (vi) Number of compressors for which leaks were not repaired as required in 40 CFR 60.482-3(g)(1), and (vii) The facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible; 3) Dates of process unit shutdowns which occurred within the semiannual reporting period; 4) Revisions to items reported in the semiannual report if changes have occurred since the initial report, as required in 40 CFR 60.487 (a) and (b), or subsequent revisions to the initial report. [40 CFR 60.487(c)] Federally Enforceable Through Title V Permit

110. An owner or operator electing to comply with the provisions of 40 CFR 60.483-1 and 60.483-2 shall notify the Administrator of the alternative standard selected 90 days before implementing either of the provisions. [40 CFR 60.487(d)] Federally Enforceable Through Title V Permit

111. An owner or operator shall report the results of all performance tests in accordance with 40 CFR 60.8 of the General Provisions. The provisions of 40 CFR 60.8(d) do not apply to affected facilities subject to the provisions of Subpart GGG except that an owner or operator must notify the Administrator of the schedule for the initial performance tests at least 30 days before the initial performance tests. [40 CFR 60.487(e)] Federally Enforceable Through Title V Permit

112. The semiannual reporting requirements of 40 CFR 60.487(a), (b), and (c) remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such State. In that event, affected sources within the State will be relieved of the obligation to comply with the requirements of 40 CFR 60.487(a), (b), and (c), provided that they comply with the requirements established by the State. [40 CFR 60.487(f)] Federally Enforceable Through Title V Permit

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113. Compressors are exempt from the standards of Subpart GGG if the owner or operator demonstrates that a compressor is in hydrogen service. Each compressor is presumed not to be in hydrogen service unless an owner or operator demonstrates that the piece of equipment is in hydrogen service. For a piece of equipment to be considered in hydrogen service, it must be determined that the percent hydrogen content can be reasonably expected always to exceed 50 percent by volume. For purposes of determining the percent hydrogen content in the process fluid that is contained in or contacts a compressor, procedures that conform to the general method described in ASTM E-260, E-168, or E-169 shall be used. An owner or operator may use engineering judgment demonstrate that the percent content exceeds 50 percent by volume, provided the engineering judgment demonstrates that the content clearly exceeds 50 percent by volume. When an owner or operator and the Administrator do not agree on whether a piece of equipment is in hydrogen service, however, the procedures that conform to the general method described in ASTM E-260, E-168, or E-169 shall be used to resolve the disagreement. If an owner or operator determines that a piece of equipment is in hydrogen service, the determination can be revised only after following the procedures that conform to the general method described in ASTM E-260, E-168, or E-169. [40 CFR 60.593(b)] Federally Enforceable Through Title V Permit

114. Any existing reciprocating compressor that becomes an affected facility under provisions of 40 CFR 60.14 or 40 CFR 60.15 is exempt from 40 CFR 60.482-3 (a), (b), (c), (d), (e), and (h) provided the owner or operator demonstrates that recasting the distance piece or replacing the compressor are the only options available to bring the compressor into compliance with the provisions of 40 CFR 60.482-3 (a), (b), (c), (d), (e), and (h). [40 CFR 60.593(c)] Federally Enforceable Through Title V Permit

115. An owner or operator may use the following provision in addition to 40 CFR 60.485(e): Equipment is in light liquid service if the percent evaporated is greater than 10 percent at 150 degrees C as determined by ASTM Method D86-78, 82, 90, 95, or 96. [40 CFR 60.593(d)] Federally Enforceable Through Title V Permit

116. Equipment that is in vacuum service is excluded from the requirements of 40 CFR 60.482-2 to 40 CFR 60.482-10 if it is identified as required in 40 CFR 60.486(e)(5). [40 CFR 60.482-1(d)] Federally Enforceable Through Title V Permit

117. For fuel gas combustion devices, a continuous emissions monitoring system shall be installed, calibrated, operated, and reported according to EPA guidelines as specified under 40 CFR 60.105(a)(3). CEM results shall be calculated on a rolling three (3) hour basis. [40 CFR 60, 60.105(a)(3)] Federally Enforceable Through Title V Permit

118. For fuel gas combustion devices, operator shall report all rolling 3-hour periods during which the average concentration of H2S as measured by the H2S continuous monitoring system exceeds 0.10 gr/dscf (230 mg/dscm) or during which the average concentration of SO2 as measured by the SO2 continuous monitoring system exceeds 20 ppm (dry basis, zero percent excess air). [40 CFR 60.105(e)(3)] Federally Enforceable Through Title V Permit

119. Operator shall determine compliance with the H2S standard using EPA Methods 11, 15, 15A, or 16. [40 CFR 60.106(e)] Federally Enforceable Through Title V Permit

120. For any periods for which sulfur dioxide or oxides emissions data are not available, the operator shall submit a signed statement indicating if any changes were made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit. Operations of the control system and affected facility during periods of data unavailability are to be compared with operation of the control system and affected facility before and following the period of data unavailability. [40 CFR 60.107(d)] Federally Enforceable Through Title V Permit

121. The owner or operator shall submit the reports required under this subpart to the District semiannually for each six-month period. All semiannual reports shall be postmarked by the 30th day following the end of each six-month period. The owner or operator shall submit a signed statement certifying the accuracy and completeness of the information contained in the report. [40 CFR 60.107(e) and 60.107(f)] Federally Enforceable Through Title V Permit

122. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

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123. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4320] Federally Enforceable Through Title V Permit

124. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 4305, and 4306] Federally Enforceable Through Title V Permit

125. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

126. Compliance with permit conditions in the Title V permit shall be deemed compliance with 40 CFR 60 Subpart GGG. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

127. The operator shall be in compliance with the applicable requirement in Sections 5.4.1 of District Rule 4320 (Adopted 10/16/2008) no later than July 1, 2013. [District Rule 4320, 5.4.1] Federally Enforceable Through Title V Permit

128. Except for complying with the applicable requirements of Sections 6.1 and 7.3, the requirements of this rule shall not apply to 1) components subject to Rule 4623 (adopted 5/19/05), 2) pressure relief devices, pumps, and compressors equipped with a closed vent system as defined in Section 3.0, 3) components buried below ground, 4) components exclusively handling liquid streams which have less than 10 percent by weight (<10 wt%) evaporation at 150 C, 5) components exclusively handling liquid streams with a VOC content less than ten percent by weight (<10 wt%), 6) components exclusively handling gas/vapor streams with a VOC content of less than one percent by weight (<1wt%), 7) components incorporated in lines exclusively in vacuum service, 8) components exclusively handling commercial natural gas, and 9) one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the Air Pollution Control Officer (APCO) to be leak-free based on initial inspection. [District Rule 4455, 4.1 & 4.2] Federally Enforceable Through Title V Permit

129. The operator shall not use any component that leaks in excess of the allowable leak standards of this rule, or is found to be in violation of the provisions specified in Section 5.1.3. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the rule. [District Rule 4455, 5.1.1] Federally Enforceable Through Title V Permit

130. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2] Federally Enforceable Through Title V Permit

131. The operator shall be in violation of this rule if any District inspection demonstrates that one or more of the conditions in Sections 5.1.4 exist at the facility. [District Rule 4455, 5.1.3.1] Federally Enforceable Through Title V Permit

132. Except for annual operator inspection described in Section 5.1.3.2.3, any operator inspection that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall not constitute a violation of this rule if the leaking components are repaired as soon as practicable but not later than the time frame specified in this rule. Such components shall not be counted towards determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.1] Federally Enforceable Through Title V Permit

133. Leaking components detected during operator inspection pursuant Section 5.1.3.2.1 that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.2] Federally Enforceable Through Title V Permit

134. Any operator inspection conducted annually for a component type (including operator annual inspections pursuant to Section 5.2.5, 5.2.6, 5.2.7, or 5.2.8) that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall constitute a violation of this rule regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this rule. [District Rule 4455, 5.1.3.2.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

135. A component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. [District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

136. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be reinspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the rule. [District Rule 4455, 5.2.1 & 5.2.2] Federally Enforceable Through Title V Permit

137. The operator shall inspect all components at least once every calendar quarter, except for inaccessible components, unsafe-to-monitor components and pipes. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5, 5.2.6, and 5.2.7. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6 & 5.2.7] Federally Enforceable Through Title V Permit

138. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs which shall continue to be inspected on a quarterly basis. [District Rule 4455, 5.2.8] Federally Enforceable Through Title V Permit

139. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five (5) calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 & 5.2.10] Federally Enforceable Through Title V Permit

140. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11] Federally Enforceable Through Title V Permit

141. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12] Federally Enforceable Through Title V Permit

142. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. Any attempt by an operator to count such District inspections as part of the mandatory operator's inspections is considered to be willful circumvention and is a violation of this rule. [District Rule 4455, 5.2.13] Federally Enforceable Through Title V Permit

143. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag that contains the information specified in Section 5.3.3. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected; and is found to be in compliance with the requirements of this rule. [District Rule 4455, 5.3.1, 5.3.2 & 5.3.3] Federally Enforceable Through Title V Permit

144. An operator shall minimize all component leaks immediately to the extent possible, but not later than one (1) hour after detection of leaks in order to stop or reduce leakage to the atmosphere. [District Rule 4455, 5.3.4] Federally Enforceable Through Title V Permit

145. If the leak has been minimized but the leak still exceeds the applicable leak standards of this rule, an operator shall repair or replace the leaking component, vent the leaking component to a closed vent system, or remove the leaking component from operation as soon as practicable but not later than the time period specified in Table 3. For each calendar quarter, the operator may be allowed to extend the repair period as specified in Table 3, for a total number of leaking components, not to exceed 0.05 percent of the number of components inspected, by type, rounded upward to the nearest integer where required. [District Rule 4455, 5.3.5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

146. If the leaking component is an essential component or a critical component and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized, but the leak still exceeds any of the applicable leak standards of this rule, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6] Federally Enforceable Through Title V Permit

147. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or any combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall comply with at least one of the requirements specified in Sections 5.3.7.1, 5.3.7.2, 5.3.7.3, or 5.3.7.4 by the applicable deadlines specified in Sections 5.3.7.5 and 5.3.7.6. If the original leaking component is replaced with a new like-in-kind component before incurring five repair actions for major leaks within 12-consecutive months, the repair count shall start over for the new component. An entire compressor or pump need not be replaced provided the compressor part(s) or pump part(s) that have incurred five repair actions as described in Section 5.3.7 are brought into compliance with at least one of the requirements of Sections 5.3.7.1 through 5.3.7.6. [District Rule 4455, 5.3.7] Federally Enforceable Through Title V Permit

148. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1] Federally Enforceable Through Title V Permit

149. After a release from a process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. For refineries processing greater than 20,000 barrels of crude oil per day, any subsequent release in excess of 500 pounds of VOC within a continuous 24-hour period shall be subject to the requirements of Section 5.4.5. [District Rule 4455, 5.4.3 & 5.4.4] Federally Enforceable Through Title V Permit

150. The operator of a refinery processing greater than 20,000 barrels of crude oil per day shall connect all process PRDs serving that process equipment to an APCO-approved closed vent system as defined in Section 3.0 if any of the conditions specified in Sections 5.4.5.1 and 5.4.5.2 occurs. Process PRDs subject to the provisions of Section 5.4.5 shall be connected to an APCO-approved closed-vent system as soon as practicable, but no later than the first turnaround after the requirement to connect becomes effective. [District Rule 4455, 5.4.5] Federally Enforceable Through Title V Permit

151. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the APCO that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. The operator shall comply with the requirements of Sections 6.1.4 if there is any change in the description of major components or critical components. [District Rule 4455, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit

152. The operator shall keep a copy of the operator management plan at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved operator management plan. [District Rule 4455, 6.1.2 & 6.1.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

153. The operator shall maintain an inspection log containing, at a minimum, 1) total number of components inspected, and total number and percentage of leaking components found by component types, 2) location, type, name or description of each leaking component, and description of any unit where the leaking component is found, 3) date of leak detection and method of leak detection, 4) for gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, 5) date of repair, replacement, or removal from operation of leaking components, 6) identification and location of essential component and critical components found leaking that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 7) methods used to minimize the leak from essential components and critical components that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 8) after the component is repaired or is replaced, the date of reinspection and the leak concentration in ppmv, 9) inspector's name, business mailing address, and business telephone number, and 10) the facility operator responsible for the inspection and repair program shall sign and date the inspection log certifying the accuracy of the information recorded in the log. [District Rule 4455, 6.2.1] Federally Enforceable Through Title V Permit

154. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, analyzer reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration. [District Rule 4455, 6.2.3] Federally Enforceable Through Title V Permit

155. The operator shall notify the APCO, by telephone or other methods approved by the APCO, of any process PRD release described in Sections 5.4.4 and 5.4.5, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. [District Rule 4455, 6.3.1] Federally Enforceable Through Title V Permit

156. The operator shall submit a written report to the APCO within thirty (30) calendar days following a PRD release subject to 6.3.1. The written report shall include 1) process PRD type, size, and location, 2) date, time and duration of the process PRD release, 3) types of VOC released and individual amounts, in pounds, including supporting calculations, 4) cause of the process PRD release, and 5) corrective actions taken to prevent a subsequent process PRD release. [District Rule 4455 6.3.2] Federally Enforceable Through Title V Permit

157. Copies of all records shall be retained for a minimum of five (5) years after the date of an entry. Such records shall be made available to the APCO, ARB, or US EPA upon request. [District Rule 4455, 6.2.2, 6.2.3 & 6.2.4] Federally Enforceable Through Title V Permit

158. Equivalent test methods other than specified in Sections 6.4.1 through 6.4.5 may be used provided such test methods have received prior approval from the US EPA, ARB, and APCO. [District Rule 4455, 6.4] Federally Enforceable Through Title V Permit

159. Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4455, 6.4.1] Federally Enforceable Through Title V Permit

160. The VOC content shall be determined using American Society of Testing and Materials (ASTM) D 1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304 for liquids. [District Rule 4455, 6.4.2] Federally Enforceable Through Title V Permit

161. The percent by volume liquid evaporated at 150 C shall be determined using ASTM D 86. [District Rule 4455, 6.4.3] Federally Enforceable Through Title V Permit

162. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4455, 6.4.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

163. Halogenated exempt compounds shall be analyzed by US EPA Method 18 or ARB Method 422 "Determination of Volatile Organic Compounds in Emission from Stationary Sources". [District Rule 4455, 6.4.5] Federally Enforceable Through Title V Permit

164. All process vents from reactors 21-R101, 21-R102, and 21-R103 shall be routed to a flare or to a control device which reduces emissions of regulated material or TOC by at least 98 weight-percent or to a concentration of less than 20 parts per million by volume, whichever is less stringent. [40 CFR 60.702] Federally Enforceable Through Title V Permit

165. All bypass lines in the closed vent system for the new reactors shall be secured in the non-diverting position with a car-seal or a lock-and-key type configuration. A visual inspection of the seal or closure mechanism shall be performed at least once every month to ensure the valve is maintained in the non-diverting position and the vent stream is not diverted through the bypass line. [40 CFR 65.703] Federally Enforceable Through Title V Permit

166. Owners or operators using boilers and process heaters to meet the 98 weight-percent emission reduction or 20 parts per million by volume outlet concentration requirement as specified in §60.702 shall introduce the vent stream into the flame zone of the boiler or process heater. The boiler or process heater shall be operated at all times when emissions are vented to them. [40 CFR 60.702] Federally Enforceable Through Title V Permit

167. An initial performance test is not required to demonstrate compliance with the 98 weight-percent emission reduction or 20 parts per million by volume outlet concentration requirement when the vent stream is introduced with the primary fuel or is used as the primary fuel. [40 CFR 60.704(b)(6)] Federally Enforceable Through Title V Permit

168. Temperature monitoring is not required for any boiler or process heater in which all vent streams are introduced with primary fuel or are used as the primary fuel. [40 CFR 60.703] Federally Enforceable Through Title V Permit

169. For each closed vent system that contains bypass lines that could divert a vent stream away from the control device and to the atmosphere, the owner or operator shall keep a record that the monthly visual inspection of the seals or closure mechanisms has been done and shall record the occurrence of all periods when the seal mechanism is broken, the bypass line valve position has changed, or the key for a lock-and-key type lock has been checked out, and records of any car-seal that has been broken. [40 CFR 60.705] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-33-63-15 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ALON BAKERSFIELD REFINING
MAILING ADDRESS: P O BOX 152 (AREA 1 & 2)
BAKERSFIELD, CA 93302-0152

LOCATION: 6451 ROSEDALE HWY (AREA 1 & 2)
BAKERSFIELD, CA 93308

SECTION: 28 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:
MODIFICATION OF SOUR WATER AND OILY WASTEWATER OPERATION INCLUDING HYDROCRACKER AND PHENOLIC SOUR WATER STRIPPING, PHOSAM UNIT, OIL WASTEWATER CLASSIFIER (83D-13), AND MISCELLANEOUS TANKS AND ASSOCIATED PIPING - AREA 2: ADD ACID TREATMENT SYSTEM

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. The VOC content of the fluids handled by the acid gas removal system shall not exceed 10% by weight. [District Rules 2201] Federally Enforceable Through Title V Permit
4. Operator shall conduct quarterly gas sampling for gas handled by acid gas removal system to qualify for exemption from fugitive component counts for components handling fluids with VOC content equal to or less than 10% by weight. If gas samples are equal to or less than 10% VOC by weight for 8 consecutive quarterly samplings, sampling frequency shall only be required annually. [District Rules 2201] Federally Enforceable Through Title V Permit
5. Off-gas from stripper columns shall be processed in acid gas treatment system. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

DRAFT

Brian Clements, Director of Permit Services

S-33-63-15 : Aug 17 2021 10:46AM -- RAMIREZH : Joint Inspection Required with RAMIREZH

6. Treated gas from acid gas treatment system shall be sent to the Area 2 low pressure flare (S-33-65). [District Rule 2201] Federally Enforceable Through Title V Permit

7. Treated off-gas from the acid gas treatment system shall contain no more than 10 ppmv hydrogen sulfide and shall contain no more than 20 ppmv ammonia. [District Rule 2201] Federally Enforceable Through Title V Permit

8. Oil skims tank shall receive liquids exclusively from classifier tank #86-J-62. Liquid throughput for oil skims tank shall not exceed 750 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit

9. True vapor pressure (TVP) of any liquid placed, stored, or held in the oil skims tank or the classifier tank #86-J-62 shall not exceed 1.5 psia at storage temperature. [District Rules 2201 and 4623] Federally Enforceable Through Title V Permit

10. Permittee shall maintain records of daily liquid throughput for the oil skims tank. [District Rule 1070] Federally Enforceable Through Title V Permit

11. Pressure/vacuum relief valve on oil skims tank shall be set to 0.5 oz vacuum and 1 oz. pressure. [District Rule 2201] Federally Enforceable Through Title V Permit

12. Except for complying with the applicable requirements of Sections 6.1 and 7.3, the requirements of this rule shall not apply to 1) components subject to Rule 4623 (adopted 5/19/05), 2) pressure relief devices, pumps, and compressors equipped with a closed vent system as defined in Section 3.0, 3) components buried below ground, 4) components exclusively handling liquid streams which have less than 10 percent by weight (<10 wt%) evaporation at 150 C, 5) components exclusively handling liquid streams with a VOC content less than ten percent by weight (<10 wt%), 6) components exclusively handling gas/vapor streams with a VOC content of less than one percent by weight (<1wt%), 7) components incorporated in lines exclusively in vacuum service, 8) components exclusively handling commercial natural gas, and 9) one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the Air Pollution Control Officer (APCO) to be leak-free based on initial inspection. [District Rule 4455, 4.1 & 4.2] Federally Enforceable Through Title V Permit

13. The operator shall not use any component that leaks in excess of the allowable leak standards of this rule, or is found to be in violation of the provisions specified in Section 5.1.3. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the rule. [District Rule 4455, 5.1.1] Federally Enforceable Through Title V Permit

14. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2] Federally Enforceable Through Title V Permit

15. The operator shall be in violation of this rule if any District inspection demonstrates that one or more of the conditions in Sections 5.1.4 exist at the facility. [District Rule 4455, 5.1.3.1] Federally Enforceable Through Title V Permit

16. Except for annual operator inspection described in Section 5.1.3.2.3, any operator inspection that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall not constitute a violation of this rule if the leaking components are repaired as soon as practicable but not later than the time frame specified in this rule. Such components shall not be counted towards determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.1] Federally Enforceable Through Title V Permit

17. Leaking components detected during operator inspection pursuant Section 5.1.3.2.1 that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.2] Federally Enforceable Through Title V Permit

18. Any operator inspection conducted annually for a component type (including operator annual inspections pursuant to Section 5.2.5, 5.2.6, 5.2.7, or 5.2.8) that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall constitute a violation of this rule regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this rule. [District Rule 4455, 5.1.3.2.3] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. A component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. [District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

20. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be reinspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the rule. [District Rule 4455, 5.2.1 & 5.2.2] Federally Enforceable Through Title V Permit

21. The operator shall inspect all components at least once every calendar quarter, except for inaccessible components, unsafe-to-monitor components and pipes. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5, 5.2.6, and 5.2.7. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6 & 5.2.7] Federally Enforceable Through Title V Permit

22. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs which shall continue to be inspected on a quarterly basis. [District Rule 4455, 5.2.8] Federally Enforceable Through Title V Permit

23. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five (5) calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 & 5.2.10] Federally Enforceable Through Title V Permit

24. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11] Federally Enforceable Through Title V Permit

25. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12] Federally Enforceable Through Title V Permit

26. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. Any attempt by an operator to count such District inspections as part of the mandatory operator's inspections is considered to be willful circumvention and is a violation of this rule. [District Rule 4455, 5.2.13] Federally Enforceable Through Title V Permit

27. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag that contains the information specified in Section 5.3.3. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected; and is found to be in compliance with the requirements of this rule. [District Rule 4455, 5.3.1, 5.3.2 & 5.3.3] Federally Enforceable Through Title V Permit

28. An operator shall minimize all component leaks immediately to the extent possible, but not later than one (1) hour after detection of leaks in order to stop or reduce leakage to the atmosphere. [District Rule 4455, 5.3.4] Federally Enforceable Through Title V Permit

29. If the leak has been minimized but the leak still exceeds the applicable leak standards of this rule, an operator shall repair or replace the leaking component, vent the leaking component to a closed vent system, or remove the leaking component from operation as soon as practicable but not later than the time period specified in Table 3. For each calendar quarter, the operator may be allowed to extend the repair period as specified in Table 3, for a total number of leaking components, not to exceed 0.05 percent of the number of components inspected, by type, rounded upward to the nearest integer where required. [District Rule 4455, 5.3.5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

30. If the leaking component is an essential component or a critical component and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized, but the leak still exceeds any of the applicable leak standards of this rule, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6] Federally Enforceable Through Title V Permit

31. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or any combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall comply with at least one of the requirements specified in Sections 5.3.7.1, 5.3.7.2, 5.3.7.3, or 5.3.7.4 by the applicable deadlines specified in Sections 5.3.7.5 and 5.3.7.6. If the original leaking component is replaced with a new like-in-kind component before incurring five repair actions for major leaks within 12-consecutive months, the repair count shall start over for the new component. An entire compressor or pump need not be replaced provided the compressor part(s) or pump part(s) that have incurred five repair actions as described in Section 5.3.7 are brought into compliance with at least one of the requirements of Sections 5.3.7.1 through 5.3.7.6. [District Rule 4455, 5.3.7] Federally Enforceable Through Title V Permit

32. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1] Federally Enforceable Through Title V Permit

33. After a release from a process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. For refineries processing greater than 20,000 barrels of crude oil per day, any subsequent release in excess of 500 pounds of VOC within a continuous 24-hour period shall be subject to the requirements of Section 5.4.5. [District Rule 4455, 5.4.3 & 5.4.4] Federally Enforceable Through Title V Permit

34. The operator of a refinery processing greater than 20,000 barrels of crude oil per day shall connect all process PRDs serving that process equipment to an APCO-approved closed vent system as defined in Section 3.0 if any of the conditions specified in Sections 5.4.5.1 and 5.4.5.2 occurs. Process PRDs subject to the provisions of Section 5.4.5 shall be connected to an APCO-approved closed-vent system as soon as practicable, but no later than the first turnaround after the requirement to connect becomes effective. [District Rule 4455, 5.4.5] Federally Enforceable Through Title V Permit

35. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the APCO that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. The operator shall comply with the requirements of Sections 6.1.4 if there is any change in the description of major components or critical components. [District Rule 4455, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit

36. The operator shall keep a copy of the operator management plan at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved operator management plan. [District Rule 4455, 6.1.2 & 6.1.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

37. The operator shall maintain an inspection log containing, at a minimum, 1) total number of components inspected, and total number and percentage of leaking components found by component types, 2) location, type, name or description of each leaking component, and description of any unit where the leaking component is found, 3) date of leak detection and method of leak detection, 4) for gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, 5) date of repair, replacement, or removal from operation of leaking components, 6) identification and location of essential component and critical components found leaking that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 7) methods used to minimize the leak from essential components and critical components that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 8) after the component is repaired or is replaced, the date of reinspection and the leak concentration in ppmv, 9) inspector's name, business mailing address, and business telephone number, and 10) the facility operator responsible for the inspection and repair program shall sign and date the inspection log certifying the accuracy of the information recorded in the log. [District Rule 4455, 6.2.1] Federally Enforceable Through Title V Permit

38. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, analyzer reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration. [District Rule 4455, 6.2.3] Federally Enforceable Through Title V Permit

39. The operator shall notify the APCO, by telephone or other methods approved by the APCO, of any process PRD release described in Sections 5.4.4 and 5.4.5, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. [District Rule 4455, 6.3.1] Federally Enforceable Through Title V Permit

40. The operator shall submit a written report to the APCO within thirty (30) calendar days following a PRD release subject to 6.3.1. The written report shall include 1) process PRD type, size, and location, 2) date, time and duration of the process PRD release, 3) types of VOC released and individual amounts, in pounds, including supporting calculations, 4) cause of the process PRD release, and 5) corrective actions taken to prevent a subsequent process PRD release. [District Rule 4455 6.3.2] Federally Enforceable Through Title V Permit

41. Copies of all records shall be retained for a minimum of five (5) years after the date of an entry. Such records shall be made available to the APCO, ARB, or US EPA upon request. [District Rule 4455, 6.2.2, 6.2.3 & 6.2.4] Federally Enforceable Through Title V Permit

42. Equivalent test methods other than specified in Sections 6.4.1 through 6.4.5 may be used provided such test methods have received prior approval from the US EPA, ARB, and APCO. [District Rule 4455, 6.4] Federally Enforceable Through Title V Permit

43. Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4455, 6.4.1] Federally Enforceable Through Title V Permit

44. The VOC content shall be determined using American Society of Testing and Materials (ASTM) D 1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304 for liquids. [District Rule 4455, 6.4.2] Federally Enforceable Through Title V Permit

45. The percent by volume liquid evaporated at 150 C shall be determined using ASTM D 86. [District Rule 4455, 6.4.3] Federally Enforceable Through Title V Permit

46. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4455, 6.4.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

47. Halogenated exempt compounds shall be analyzed by US EPA Method 18 or ARB Method 422 "Determination of Volatile Organic Compounds in Emission from Stationary Sources". [District Rule 4455, 6.4.5] Federally Enforceable Through Title V Permit

48. Operators shall not depressurize any vessel containing VOCs unless the process unit turnaround is accomplished by employing one of the following operating procedures: The organic vapors shall either be recovered, added to the refinery fuel gas system and combusted; or controlled and piped to an appropriate firebox or incinerated for combustion; or flared, until the pressure within the process vessel is as close to atmospheric pressure as is possible. All process vessels shall be depressurized into the control facilities to less than 1020 mm Hg (5 psig) before venting/opening to atmosphere. All organic compounds which emerge from a refinery process vessel during the purging of said vessel and which otherwise would be emitted to the atmosphere shall be either directed to a flare or incinerator or shall be used for fuel until such disposition of emissions is not technically feasible or is less safe than atmospheric venting. [District Rule 4454, 4.0] Federally Enforceable Through Title V Permit

49. A person shall not use any compartment of any vessel or device operated for the recovery of oil or tar from effluent water, from any equipment which processes, refines, stores or handles petroleum or coal tar products unless such compartments are equipped with one of the following vapor loss control devices, except when gauging or sampling is taking place: 1) A solid cover with all openings sealed and totally enclosing the liquid contents of the compartment, except for such breathing vents as are structurally necessary, 2) A floating pontoon or double-deck type cover, equipped with closure seals that have no holes or tears, installed and maintained so that gaps between the compartment wall and seal shall not exceed one-eighth (1/8) inch for an accumulative length of 97 percent of the perimeter of the tank, and shall not exceed one-half (1/2) inch for an accumulative length of the remaining three (3) percent of the perimeter of the tank. No gap between the compartment wall and the seal shall exceed one-half (1/2) inch, or 3) A vapor recovery system with a combined collection and control efficiency of at least 90 percent by weight. [District Rule 4625, 5.1] Federally Enforceable Through Title V Permit

50. Any gauging and sampling device in the compartment cover shall be equipped with a cover or lid. The cover shall be in a closed position at all times, except when the device is in actual use. [District Rule 4625, 5.2] Federally Enforceable Through Title V Permit

51. All wastewater separator forbays shall be covered. [District Rule 4625, 5.3] Federally Enforceable Through Title V Permit

52. Skimmed oil or tar removed from wastewater separating devices shall be either charged to process units with feed or transferred to a container with a control system with at least 90 percent control efficiency by weight. [District Rule 4625, 5.4] Federally Enforceable Through Title V Permit

53. Efficiency of VOC control device shall be determined by EPA Test Method 25 and analysis of halogenated exempt compounds shall be by ARB Method 422. [District Rule 4625, 6.1.1] Federally Enforceable Through Title V Permit

54. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: S-33-124-14 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ALON BAKERSFIELD REFINING
MAILING ADDRESS: P O BOX 152 (AREA 1 & 2)
BAKERSFIELD, CA 93302-0152

LOCATION: 6451 ROSEDALE HWY (AREA 1 & 2)
BAKERSFIELD, CA 93308

SECTION: 28 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:
MODIFICATION OF GAS PLANT #2 INCLUDING AMINE REGENERATION SYSTEM, VOC COALESCER, DRYER SYSTEM, DE-ETHANIZER, DE-PROPANIZER, PIPING TO SRU #1 (PTO #S-33-16) AND MISC. PUMPS, PIPING AND VESSELS: REPLACE TRAYS IN DEPROPANIZER COLUMN, DEBUTANIZER, AND DEETHANIZER AS REQUIRED, INSTALL VESSELS, EXCHANGERS, PUMPS, SEPARATORS, AND CAUSTIC TREATING PROCESS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) S-33-124-13 shall be implemented prior to or concurrently with this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Off-gases from HTU #3 desulfurizer stripper (#S-33-52) and HCU debutanizer (#S-33-53) shall be routed to an amine absorber for sulfur removal prior to combustion, except during breakdown conditions pursuant to Rule 1100. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All amine regenerator off-gas from this permit unit shall be desulfurized at SRU #1 (S-33-16) and/or SRU #3 (S-33-338), except during breakdown conditions pursuant to Rule 1100. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

DRAFT

Brian Clements, Director of Permit Services

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

6. VOC emission rate from fugitive components associated with this emissions unit shall not exceed 23.8 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

7. A component shall be considered leaking if one or more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of Rule 4455 exist at the facility. For this permit unit, except for pumps and compressors, a minor gas leak shall be defined for any component listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service as a reading in excess of 100 ppmv above background up to and including a reading of 10,000 ppmv above background. For pumps, compressors and other component types not specifically listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service, a minor gas leak shall be defined as a reading in excess of 500 ppmv above background up to and including a reading of 10,000 ppmv above background. Readings shall be taken as methane using a portable hydrocarbon detection instrument and shall be made in accordance with the methods specified in Section 6.4.1 of Rule 4455. [District Rule 2201 and District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

8. Permit holder shall maintain accurate component count and resultant emissions according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-3a (Feb 1999), Correlation Equations Method. Permit holder shall update such records when new components are approved and installed. Components shall be screened and leak rate shall be measured in accordance with the frequency of inspection specified in Rule 4455 as applicable. [District Rule 2201] Federally Enforceable Through Title V Permit

9. If the unit's actual fugitive emissions exceed 7,792 lb VOCs per calendar year the permittee must report to the District the annual VOC emissions as calculated pursuant to paragraph 40 CFR 51.165(a)(6)(iii) and any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection. Such information must be submitted to the District for a period of 5 calendar years beginning the year of operation under ATC S-33-124-12 and shall be submitted within 60 days of the end of each calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit

10. Compliance with fugitive VOC emission limit shall be demonstrated by annual component count and District approved emission factors. [District Rule 2201] Federally Enforceable Through Title V Permit

11. Fuel oil contribution to total heat input shall not exceed the following percentages: 70% for crude heaters (11H11 and 11H12) and boilers (81B17 and 81B18) and 63% for vacuum heater (18H11). [District Rule 2201] Federally Enforceable Through Title V Permit

12. Permittee shall maintain accurate records of fuel oil contribution to total heat input for crude heaters (11H11 & 11H12), boilers (81B17 & 81B18), and vacuum heater (18H11), and shall make such records readily available for District inspection. [District Rule 1070] Federally Enforceable Through Title V Permit

13. Operators shall not depressurize any vessel containing VOCs unless the process unit turnaround is accomplished by employing one of the following operating procedures: The organic vapors shall either be recovered, added to the refinery fuel gas system and combusted; or controlled and piped to an appropriate firebox or incinerated for combustion; or flared, until the pressure within the process vessel is as close to atmospheric pressure as is possible. All process vessels shall be depressurized into the control facilities to less than 1020 mm Hg (5 psig) before venting/opening to atmosphere. All organic compounds which emerge from a refinery process vessel during the purging of said vessel and which otherwise would be emitted to the atmosphere shall be either directed to a flare or incinerator or shall be used for fuel until such disposition of emissions is not technically feasible or is less safe than atmospheric venting. [District Rule 4454, 4.0] Federally Enforceable Through Title V Permit

14. The operator shall not burn in any fuel gas combustion device any fuel that contains hydrogen sulfide (H2S) in excess of 0.10 gr/dscf (230 mg/dscm) [40 CFR 60.104(a)(1)] Federally Enforceable Through Title V Permit

15. For fuel gas combustion devices, a continuous emissions monitoring system shall be installed, calibrated, operated, and reported according to EPA guidelines as specified under 40 CFR 60.105(a)(3). CEM results shall be calculated on a rolling three (3) hour basis. [40 CFR 60, 60.105(a)(3)] Federally Enforceable Through Title V Permit

16. For fuel gas combustion devices, operator shall report all rolling 3-hour periods during which the average concentration of H2S as measured by the H2S continuous monitoring system exceeds 0.10 gr/dscf (230 mg/dscm) or during which the average concentration of SO2 as measured by the SO2 continuous monitoring system exceeds 20 ppm (dry basis, zero percent excess air). [40 CFR 60.105(e)(3)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

17. Operator shall determine compliance with the H2S standard using EPA Methods 11, 15, 15A, or 16. [40 CFR 60.106(e)] Federally Enforceable Through Title V Permit

18. For any periods for which sulfur dioxide or oxides emissions data are not available, the operator shall submit a signed statement indicating if any changes were made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit. Operations of the control system and affected facility during periods of data unavailability are to be compared with operation of the control system and affected facility before and following the period of data unavailability. [40 CFR 60.107(d)] Federally Enforceable Through Title V Permit

19. The owner or operator shall submit the reports required under this subpart to the District semiannually for each six-month period. All semiannual reports shall be postmarked by the 30th day following the end of each six-month period. The owner or operator shall submit a signed statement certifying the accuracy and completeness of the information contained in the report. [40 CFR 60.107(e) and 60.107(f)] Federally Enforceable Through Title V Permit

20. Except for complying with the applicable requirements of Sections 6.1 and 7.3, the requirements of this rule shall not apply to 1) components subject to Rule 4623 (adopted 5/19/05), 2) pressure relief devices, pumps, and compressors equipped with a closed vent system as defined in Section 3.0, 3) components buried below ground, 4) components exclusively handling liquid streams which have less than 10 percent by weight (<10 wt%) evaporation at 150 C, 5) components exclusively handling liquid streams with a VOC content less than ten percent by weight (<10 wt%), 6) components exclusively handling gas/vapor streams with a VOC content of less than one percent by weight (<1wt%), 7) components incorporated in lines exclusively in vacuum service, 8) components exclusively handling commercial natural gas, and 9) one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the Air Pollution Control Officer (APCO) to be leak-free based on initial inspection. [District Rule 4455, 4.1 & 4.2] Federally Enforceable Through Title V Permit

21. The operator shall not use any component that leaks in excess of the allowable leak standards of this rule, or is found to be in violation of the provisions specified in Section 5.1.3. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the rule. [District Rule 4455, 5.1.1] Federally Enforceable Through Title V Permit

22. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2] Federally Enforceable Through Title V Permit

23. The operator shall be in violation of this rule if any District inspection demonstrates that one or more of the conditions in Sections 5.1.4 exist at the facility. [District Rule 4455, 5.1.3.1] Federally Enforceable Through Title V Permit

24. Except for annual operator inspection described in Section 5.1.3.2.3, any operator inspection that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall not constitute a violation of this rule if the leaking components are repaired as soon as practicable but not later than the time frame specified in this rule. Such components shall not be counted towards determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.1] Federally Enforceable Through Title V Permit

25. Leaking components detected during operator inspection pursuant Section 5.1.3.2.1 that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.2] Federally Enforceable Through Title V Permit

26. Any operator inspection conducted annually for a component type (including operator annual inspections pursuant to Section 5.2.5, 5.2.6, 5.2.7, or 5.2.8) that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall constitute a violation of this rule regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this rule. [District Rule 4455, 5.1.3.2.3] Federally Enforceable Through Title V Permit

27. A component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. [District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

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28. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be reinspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the rule. [District Rule 4455, 5.2.1 & 5.2.2] Federally Enforceable Through Title V Permit

29. The operator shall inspect all components at least once every calendar quarter, except for inaccessible components, unsafe-to-monitor components and pipes. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5, 5.2.6, and 5.2.7. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6 & 5.2.7] Federally Enforceable Through Title V Permit

30. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs which shall continue to be inspected on a quarterly basis. [District Rule 4455, 5.2.8] Federally Enforceable Through Title V Permit

31. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five (5) calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 & 5.2.10] Federally Enforceable Through Title V Permit

32. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11] Federally Enforceable Through Title V Permit

33. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12] Federally Enforceable Through Title V Permit

34. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. Any attempt by an operator to count such District inspections as part of the mandatory operator's inspections is considered to be willful circumvention and is a violation of this rule. [District Rule 4455, 5.2.13] Federally Enforceable Through Title V Permit

35. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag that contains the information specified in Section 5.3.3. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected; and is found to be in compliance with the requirements of this rule. [District Rule 4455, 5.3.1, 5.3.2 & 5.3.3] Federally Enforceable Through Title V Permit

36. An operator shall minimize all component leaks immediately to the extent possible, but not later than one (1) hour after detection of leaks in order to stop or reduce leakage to the atmosphere. [District Rule 4455, 5.3.4] Federally Enforceable Through Title V Permit

37. If the leak has been minimized but the leak still exceeds the applicable leak standards of this rule, an operator shall repair or replace the leaking component, vent the leaking component to a closed vent system, or remove the leaking component from operation as soon as practicable but not later than the time period specified in Table 3. For each calendar quarter, the operator may be allowed to extend the repair period as specified in Table 3, for a total number of leaking components, not to exceed 0.05 percent of the number of components inspected, by type, rounded upward to the nearest integer where required. [District Rule 4455, 5.3.5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

38. If the leaking component is an essential component or a critical component and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized, but the leak still exceeds any of the applicable leak standards of this rule, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6] Federally Enforceable Through Title V Permit

39. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or any combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall comply with at least one of the requirements specified in Sections 5.3.7.1, 5.3.7.2, 5.3.7.3, or 5.3.7.4 by the applicable deadlines specified in Sections 5.3.7.5 and 5.3.7.6. If the original leaking component is replaced with a new like-in-kind component before incurring five repair actions for major leaks within 12-consecutive months, the repair count shall start over for the new component. An entire compressor or pump need not be replaced provided the compressor part(s) or pump part(s) that have incurred five repair actions as described in Section 5.3.7 are brought into compliance with at least one of the requirements of Sections 5.3.7.1 through 5.3.7.6. [District Rule 4455, 5.3.7] Federally Enforceable Through Title V Permit

40. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1] Federally Enforceable Through Title V Permit

41. After a release from a process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. For refineries processing greater than 20,000 barrels of crude oil per day, any subsequent release in excess of 500 pounds of VOC within a continuous 24-hour period shall be subject to the requirements of Section 5.4.5. [District Rule 4455, 5.4.3 & 5.4.4] Federally Enforceable Through Title V Permit

42. The operator of a refinery processing greater than 20,000 barrels of crude oil per day shall connect all process PRDs serving that process equipment to an APCO-approved closed vent system as defined in Section 3.0 if any of the conditions specified in Sections 5.4.5.1 and 5.4.5.2 occurs. Process PRDs subject to the provisions of Section 5.4.5 shall be connected to an APCO-approved closed-vent system as soon as practicable, but no later than the first turnaround after the requirement to connect becomes effective. [District Rule 4455, 5.4.5] Federally Enforceable Through Title V Permit

43. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the APCO that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. The operator shall comply with the requirements of Sections 6.1.4 if there is any change in the description of major components or critical components. [District Rule 4455, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit

44. The operator shall keep a copy of the operator management plan at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved operator management plan. [District Rule 4455, 6.1.2 & 6.1.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

45. The operator shall maintain an inspection log containing, at a minimum, 1) total number of components inspected, and total number and percentage of leaking components found by component types, 2) location, type, name or description of each leaking component, and description of any unit where the leaking component is found, 3) date of leak detection and method of leak detection, 4) for gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, 5) date of repair, replacement, or removal from operation of leaking components, 6) identification and location of essential component and critical components found leaking that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 7) methods used to minimize the leak from essential components and critical components that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 8) after the component is repaired or is replaced, the date of reinspection and the leak concentration in ppmv, 9) inspector's name, business mailing address, and business telephone number, and 10) the facility operator responsible for the inspection and repair program shall sign and date the inspection log certifying the accuracy of the information recorded in the log. [District Rule 4455, 6.2.1] Federally Enforceable Through Title V Permit

46. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, analyzer reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration. [District Rule 4455, 6.2.3] Federally Enforceable Through Title V Permit

47. The operator shall notify the APCO, by telephone or other methods approved by the APCO, of any process PRD release described in Sections 5.4.4 and 5.4.5, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. [District Rule 4455, 6.3.1] Federally Enforceable Through Title V Permit

48. The operator shall submit a written report to the APCO within thirty (30) calendar days following a PRD release subject to 6.3.1. The written report shall include 1) process PRD type, size, and location, 2) date, time and duration of the process PRD release, 3) types of VOC released and individual amounts, in pounds, including supporting calculations, 4) cause of the process PRD release, and 5) corrective actions taken to prevent a subsequent process PRD release. [District Rule 4455 6.3.2] Federally Enforceable Through Title V Permit

49. Copies of all records shall be retained for a minimum of five (5) years after the date of an entry. Such records shall be made available to the APCO, ARB, or US EPA upon request. [District Rule 4455, 6.2.2, 6.2.3 & 6.2.4] Federally Enforceable Through Title V Permit

50. Equivalent test methods other than specified in Sections 6.4.1 through 6.4.5 may be used provided such test methods have received prior approval from the US EPA, ARB, and APCO. [District Rule 4455, 6.4] Federally Enforceable Through Title V Permit

51. Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4455, 6.4.1] Federally Enforceable Through Title V Permit

52. The VOC content shall be determined using American Society of Testing and Materials (ASTM) D 1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304 for liquids. [District Rule 4455, 6.4.2] Federally Enforceable Through Title V Permit

53. The percent by volume liquid evaporated at 150 C shall be determined using ASTM D 86. [District Rule 4455, 6.4.3] Federally Enforceable Through Title V Permit

54. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4455, 6.4.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

55. Halogenated exempt compounds shall be analyzed by US EPA Method 18 or ARB Method 422 "Determination of Volatile Organic Compounds in Emission from Stationary Sources". [District Rule 4455, 6.4.5] Federally Enforceable Through Title V Permit

56. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-33-401-4 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ALON BAKERSFIELD REFINING
MAILING ADDRESS: P O BOX 152 (AREA 1 & 2)
BAKERSFIELD, CA 93302-0152

LOCATION: 6451 ROSEDALE HWY (AREA 1 & 2)
BAKERSFIELD, CA 93308

EQUIPMENT DESCRIPTION:
MODIFICATION OF RAILCAR LOADING/UNLOADING OPERATION WITH 8 TRANSFER STATIONS: REBUILD RAILCAR LOADING/UNLOADING OPERATION BY REPLACING RACKS, ARMS, AND OTHER FUGITIVE COMPONENTS AS NECESSARY

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Operation shall include 8-spot railcar loading/unloading operation with disconnect, dry-break couplers, top loading drop tubes (equivalent to bottom loading) and three unloading pumps. Vapor lines shall vent to shared vapor control system. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Organic liquids with TVP greater than 0.5 psia unloaded from railcars shall be piped only to vapor controlled tanks. [District Rules 2201and 4623] Federally Enforceable Through Title V Permit
5. Railcars loaded shall be connected to vapor recovery system except during the loading of crude oil with an API gravity less than 30 degrees, or crude oil, asphalt, or residual fuel oil stored in tanks which are exempt from permits pursuant to District Rule 2020. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC emission rate from equipment associated with railcar loading/unloading operation shall not exceed 0.83 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

7. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using < 10,000 ppmv emission factors from Table IV-2b (Marketing Terminal Screening Value Range Emission Factors) of the California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities based on EPA's "Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017), or other District approved emission factors. [District Rule 2201] Federally Enforceable Through Title V Permit
8. There shall be no more than 16 railcar loadings/unloadings per day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Permittee shall keep accurate records of railcar loading/unloading, liquid types, and liquid throughputs. [District Rule 1070] Federally Enforceable Through Title V Permit
10. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
11. The transfer rack vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
12. For a Class 1 organic liquid transfer facility, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. The VOC from the transfer operation shall be routed a storage tank that meets the control requirements specified in Rule 4623 (Amended 5/19/05). [District Rules 4624, 5.1] Federally Enforceable Through Title V Permit
13. The transfer rack vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.4] Federally Enforceable Through Title V Permit
14. The construction of any new top loading facility or the reconstruction, as defined in 40 CFR 60.15, or the expansion of any existing top loading facility with top loading equipment shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit
15. In an organic liquid transfer facility, a leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above background as methane, or for gasoline, a concentration of VOC greater than 10,000 ppmv as methane above background when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 4624, 3.17] Federally Enforceable Through Title V Permit
16. Excess organic liquid drainage is defined as more than ten (10) milliliters liquid drainage. Such liquid drainage for disconnect operations shall be determined by computing the average drainage from three consecutive disconnects at any one permit unit. [District Rule 4624, 3.13] Federally Enforceable Through Title V Permit
17. The operator shall inspect the transfer rack vapor collection and control system and each transfer rack handling organic liquids for leaks during transfer at least once every calendar quarter using the EPA Method 21. [District Rule 4624, 5.9.1] Federally Enforceable Through Title V Permit
18. All leaking transfer equipment shall be repaired or replaced within 72 hours of discovery. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624, 5.9.3] Federally Enforceable Through Title V Permit
19. For an organic liquid transfer facility, an operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection, the inspection frequency shall revert back to quarterly, and the operator shall contact the APCO in writing within 14 days. [District Rule 4624, 5.9.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of annual drainage inspections at disconnect for each loading arm. If excess drainage on any loading rack is found, the drainage inspection frequency for that unit shall be changed from annual to quarterly. If no excess drainage is found during five quarterly inspections, inspection frequency for that unit shall be changed back from quarterly to annual. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

21. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

22. The permittee shall keep records of daily liquid throughput and maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired), and E) inspector name and signature. [District Rule 2520, 9.3.2 and 4624, 6.1.3] Federally Enforceable Through Title V Permit

23. VOC emissions from the transfer rack vapor collection and control system shall be determined annually using 40 CFR 60.503. "Test Methods and Procedures" and EPA Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Test Procedure TP-203.1. [District Rule 4624, 6.3.2] Federally Enforceable Through Title V Permit

24. The transfer rack vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: S-33-451-0 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: ALON BAKERSFIELD REFINING
MAILING ADDRESS: P O BOX 152 (AREA 1 & 2)
BAKERSFIELD, CA 93302-0152

LOCATION: 6451 ROSEDALE HWY (AREA 1 & 2)
BAKERSFIELD, CA 93308

EQUIPMENT DESCRIPTION:
ORGANIC LIQUID TRUCK LOADING/UNLOADING RACK WITH TWO TRANSFER STATIONS, CONNECTED TO VAPOR RECOVERY SYSTEM

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Prior to operating equipment under this Authority to Construct, permittee shall surrender surplus VOC emission reduction credits for the following quantity of emissions: 1st quarter - 279 lb, 2nd quarter - 280 lb, 3rd quarter - 280 lb, and 4th quarter - 280 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 2/18/16) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
4. ERC Certificate Number S-5178-1 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct [District Rule 2201] Federally Enforceable Through Title V Permit
5. There shall be no more than 40 tank truck loadings/unloadings per day. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services

S-33-451-0 : Aug 17 2021 10:46AM -- RAMIREZH : Joint Inspection Required with RAMIREZH

6. Operation shall include truck loading/unloading operation with disconnect, dry-break couplers, top loading drop tubes (equivalent to bottom loading). Vapor lines shall vent to shared vapor control system. [District Rules 2201 and 4624] Federally Enforceable Through Title V Permit

7. Permit holder shall maintain accurate component count and resultant emissions according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-3a (Feb 1999), Correlation Equations Method. Permit holder shall update such records when new components are approved and installed. Components shall be screened and leak rate shall be measured in accordance with the frequency of inspection specified in Rule 4455 as applicable. [District Rule 2201] Federally Enforceable Through Title V Permit

8. Components shall be screened and leak rate shall be measured in accordance with the frequency of inspection specified in Rule 4455 as applicable. [District Rule 4455] Federally Enforceable Through Title V Permit

9. VOC emission rate from fugitive components associated with this emissions unit shall not exceed 1.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

10. A component shall be considered leaking if one or more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of Rule 4455 exist at the facility. For this permit unit, except for pumps and compressors, a minor gas leak shall be defined for any component listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service as a reading in excess of 100 ppmv above background up to and including a reading of 10,000 ppmv above background. For pumps, compressors and other component types not specifically listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service, a minor gas leak shall be defined as a reading in excess of 500 ppmv above background up to and including a reading of 10,000 ppmv above background. Readings shall be taken as methane using a portable hydrocarbon detection instrument and shall be made in accordance with the methods specified in Section 6.4.1 of Rule 4455. [District Rule 2201 and District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

11. Organic liquid transfer shall be with vapor control such that VOC emissions do not exceed 0.015 lb per 1000 gallons of liquid loaded. [District Rules 4624, 5.1] Federally Enforceable Through Title V Permit

12. The vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. This requirement shall not apply to the transfer of liquefied petroleum gas, butane, or propane. [District Rule 4624, 5.4] Federally Enforceable Through Title V Permit

13. All delivery tanks which previously contained organic liquids, including gasoline, with a TVP greater than 1.5 psia at loading conditions shall be filled only at Class 1 loading facilities using bottom loading equipment with a vapor collection and control system operating such that VOC emissions do not exceed 0.015 lb/1000 gallons loaded. [District Rule 4624, 5.5] Federally Enforceable Through Title V Permit

14. Transfer and vapor collection equipment shall be designed, installed, maintained and operated such that there are no leaks or excess organic liquid drainage at disconnections. A leak shall be defined as the dripping of organic compounds at a rate of more than three drops per minute or the detection of organic compounds, in excess of 10,000 ppm as methane measured at the surface of the component interface from the potential source in accordance with EPA Method 21. Excess liquid drainage shall be defined as exceeding 10 mL, per average of 3 consecutive disconnects. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit

15. The construction of any new top loading facility or the reconstruction, as defined in 40 CFR 60.15, or the expansion of any existing top loading facility with top loading equipment shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit

16. In an organic liquid transfer facility, a leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above background as methane, or for gasoline, a concentration of VOC greater than 10,000 ppmv as methane above background when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 4624, 3.17] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

17. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of drainage inspections at disconnect conducted on a quarter of the loading arms every calendar quarter. However, if one or more excess drainage condition is found during a quarterly inspection, the inspection frequency shall change to quarterly for all loading arms. If no excess drainage is found after four consecutive quarterly inspection of all loading arms, the inspection frequency shall return to inspections of a quarter of the loading arms every calendar quarter. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

18. The operator shall inspect the transfer rack vapor collection and control system and each transfer rack handling organic liquids for leaks during transfer at least once every calendar quarter using the EPA Method 21. [District Rule 4624, 5.9.1] Federally Enforceable Through Title V Permit

19. Each leaking component shall be repaired or replaced within 72 hours after detection. If the leaking component cannot be repaired or replaced within 72 hours, it shall be taken out of service until such time as it is repaired or replaced. Components taken out of service shall be repaired or replaced within 15 calendar days of leak detection. [District Rule 4624, 5.9.3] Federally Enforceable Through Title V Permit

20. For an organic liquid transfer facility, an operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection, the inspection frequency shall revert back to quarterly, and the operator shall contact the APCO in writing within 14 days. [District Rule 4624, 5.9.4] Federally Enforceable Through Title V Permit

21. The permittee shall maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired, reasons for any leak repair interval in excess of 15 days), and E) inspector name and signature. [District Rule 2520, 9.3.2 and 4624, 6.1.3] Federally Enforceable Through Title V Permit

22. VOC emissions shall be determined annually using 40CFR 60.503 Test Methods and Procedures, and EPA Reference Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Test Procedure TP-203.1. [District Rule 4624, 6.3.2] Federally Enforceable Through Title V Permit

23. Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4624, 6.3.8] Federally Enforceable Through Title V Permit

24. Equivalent test methods other than specified in Sections 6.4.1 through 6.4.5 may be used provided such test methods have received prior approval from the US EPA, ARB, and APCO. [District Rule 4624, 6.3.9] Federally Enforceable Through Title V Permit

25. Vapors from loading operations shall be directed to an existing vapor recovery system. [District Rule 2201] Federally Enforceable Through Title V Permit

26. Loading of a delivery vessel shall discontinue if its pressure relief valve opens. Corrective action shall be taken should this condition occur. [District Rule 4624] Federally Enforceable Through Title V Permit

27. Except for complying with the applicable requirements of Sections 6.1 and 7.3, the requirements of this rule shall not apply to 1) components subject to Rule 4623 (adopted 5/19/05), 2) pressure relief devices, pumps, and compressors equipped with a closed vent system as defined in Section 3.0, 3) components buried below ground, 4) components exclusively handling liquid streams which have less than 10 percent by weight (10 wt%) evaporation at 150 C, 5) components exclusively handling liquid streams with a VOC content less than ten percent by weight (10 wt%), 6) components exclusively handling gas/vapor streams with a VOC content of less than one percent by weight (1 wt%), 7) components incorporated in lines exclusively in vacuum service, 8) components exclusively handling commercial natural gas, and 9) one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the Air Pollution Control Officer (APCO) to be leak-free based on initial inspection. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

28. Permittee shall maintain accurate records number of trucks loaded/unloaded per day, of the number of disconnects per day, liquid types, liquid throughput , the quantity of excess liquid collected each week, and the calculated average liquid loss per disconnect. [District Rule 1070] Federally Enforceable Through Title V Permit

29. The permittee shall keep records of daily liquid throughput and maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired), and E) inspector name and signature. [District Rule 2520, 9.3.2 and 4624, 6.1.3] Federally Enforceable Through Title V Permit

30. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 4624] Federally Enforceable Through Title V Permit

APPENDIX B

Current Permits to Operate (or Outstanding ATC Serving as Base Document)

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

AUTHORITY TO CONSTRUCT

PERMIT NO: S-33-56-33 **ISSUANCE DATE:** 04/22/2020

LEGAL OWNER OR OPERATOR: ALON BAKERSFIELD REFINING
MAILING ADDRESS: 6451 ROSEDALE HWY (AREA 1 & 2)
BAKERSFIELD, CA 93308

LOCATION: 6451 ROSEDALE HWY (AREA 1 & 2)
BAKERSFIELD, CA 93308

SECTION: 28 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:
MODIFICATION OF HYDROCRACKER UNIT #21 INCLUDING 9 HEATERS, CATALYTIC ASSEMBLY, AND MISC AIR COOLERS, EXCHANGERS, DRUMS, AND PUMPS - AREA 2: INSTALL 3 REACTORS, HIGH PRESSURE SEPARATOR, EXCHANGERS, PUMPS, LEAN OIL ABSORBER, ELECTRICALLY-DRIVEN COMPRESSOR, REMOVE EXISTING HEAT EXCHANGERS (REISSUED TO NEW OWNER 7/27/2020)

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Prior to operating equipment the dedicated cargo carrier to produce renewable diesel fuel, permittee shall surrender NOx emission reduction credits for the following quantity of emissions: 1st quarter - 62 lb, 2nd quarter - 63 lb, 3rd quarter - 63 lb, and fourth quarter - 63 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
3. ERC Certificate Numbers S-4986-2 (or certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Records of all dates and times that this unit is designated as dormant or active, and copies of all corresponding notices to the District, shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
S-33-56-33 : Jul 27 2020 1:25PM – SCANDURL : Joint Inspection NOT Required

5. Hydrocracker unit shall include two 40.0 MMBtu/hr charge heaters (21H11 and 21H12), two 18.1 MMBtu/hr heaters (21H13 and 21H14), two 11.4 MMBtu/hr heaters (21H15 and 21H16), one 27.8 MMBtu/hr heater (21H17), one 34.6 MMBtu/hr heater (21H18), one 65.0 MMBtu/hr heater (21H20), catalytic assembly, miscellaneous air coolers, heat exchangers, drums, pumps, piping, and vessels. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Firing rate of heater 21H20 shall not exceed 65.0 MMBtu/hr. [District NSR Rule and 4306] Federally Enforceable Through Title V Permit
7. Continuous records of heater 21H20's firing rate, including volumetric fuel consumption rate (corrected for temperature) and hhv of fuel burned shall be maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
8. VOC emission rate from fugitive components associated with this emissions unit shall not exceed 43.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. A component shall be considered leaking if one or more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of Rule 4455 exist at the facility. For this permit unit, except for pumps and compressors, a minor gas leak shall be defined for any component listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service as a reading in excess of 100 ppmv above background up to and including a reading of 10,000 ppmv above background. For pumps, compressors and other component types not specifically listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service, a minor gas leak shall be defined as a reading in excess of 500 ppmv above background up to and including a reading of 10,000 ppmv above background. Readings shall be taken as methane using a portable hydrocarbon detection instrument and shall be made in accordance with the methods specified in Section 6.4.1 of Rule 4455. [District Rule 2201 and District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit
10. Permit holder shall maintain accurate component count and resultant emissions according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-3a (Feb 1999), Correlation Equations Method. Permit holder shall update such records when new components are approved and installed. Components shall be screened and leak rate shall be measured in accordance with the frequency of inspection specified in Rule 4455 as applicable. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Except during startup and shutdown, heater 21H18 emission rates shall not exceed the following: NOx (as NO2) 0.036 lb/MMBtu or 30 ppmvd @ 3% O2, CO: 0.075 lb/MMBtu or 100 ppmv @ 3% O2, VOC: 0.005 lb/MMBtu, and PM10: 0.014 lb/MMBtu. [District NSR Rule, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
12. Heater 21H20 emission rates shall not exceed NOx (as NO2): 0.036 lb/MMBtu or 30 ppmv @ 3% O2, and CO: 400 ppmv @ 3% O2. [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
13. Except during startup and shutdown, heater 21H11 emission rates shall not exceed NOx (as NO2) 30 ppmvd @ 3% O2, CO: 100 ppmvd @ 3% O2, VOC: 0.003 lb/MMBtu, and PM10: 0.014 lb/MMBtu. [District NSR Rule, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
14. Except during startup and shutdown, heater 21H12 emission rates shall not exceed any of the following: NOx (as NO2): 30 ppmv @ 3% O2, CO: 100 ppmvd @ 3% O2, VOC: 0.003 lb/MMBtu, PM10: 0.014 lb/MMBtu, or SOx (as SO2): 0.0286 lb/MMBtu. [District NSR Rule, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
15. Except during startup and shutdown, heaters 21H13 through 21H17 emission rates shall not exceed: NOx (as NO2): 0.036 lb/MMBtu or 30 ppmvd @ 3% O2, CO: 400 ppmvd @ 3% O2, VOC: 0.0055 lb/MMBtu, PM10: 0.0076 lb/MMBtu, or SOx (as SO2): 0.0286 lb/MMBtu. [District NSR Rule, 4305, 4306, and 4351] Federally Enforceable Through Title V Permit
16. Emission rates from heater 21H11 shall not exceed any of the following: PM10: 13.4 lb/day, SOx (as SO2): 27.5 lb/day, VOC: 2.9 lb/day, NOx (as NO2): 34.6 lb/day, or CO: 72.0 lb/day [District NSR Rule] Federally Enforceable Through Title V Permit
17. Emission rates from heater 21H12 shall not exceed any of the following: PM10: 13.4 lb/day, SOx (as SO2): 27.5 lb/day, VOC: 2.9 lb/day, NOx (as NO2): 34.6 lb/day, or CO: 72.0 lb/day [District NSR Rule] Federally Enforceable Through Title V Permit

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18. Emission rates from heater 21H13 shall not exceed any of the following: PM10: 3.3 lb/day, SOx (as SO2): 12.4 lb/day, VOC: 2.4 lb/day, NOx (as NO2): 36.9 lb/day or 5,694 lb/year, or CO: 130.3 lb/day or 10,655 lb/year. [District NSR Rule] Federally Enforceable Through Title V Permit

19. Emission rates from heater 21H14 shall not exceed any of the following: PM10: 3.3 lb/day, SOx (as SO2): 12.4 lb/day, VOC: 2.4 lb/day, NOx (as NO2): 36.9 lb/day or 5,694 lb/year, or CO: 130.3 lb/day or 10,655 lb/year. [District NSR Rule] Federally Enforceable Through Title V Permit

20. Emission rates from heater 21H15 shall not exceed any of the following: PM10: 2.1 lb/day, SOx (as SO2): 7.8 lb/day, VOC: 1.5 lb/day, NOx (as NO2): 23.3 lb/day or 3,577 lb/year, or CO: 82.1 lb/day or 6,711 lb/year. [District NSR Rule] Federally Enforceable Through Title V Permit

21. Emission rates from heater 21H16 shall not exceed any of the following: PM10: 2.1 lb/day, SOx (as SO2): 7.8 lb/day, VOC: 1.5 lb/day, NOx (as NO2): 23.3 lb/day or 3,577 lb/year, or CO: 82.1 lb/day or 6,711 lb/year. [District NSR Rule] Federally Enforceable Through Title V Permit

22. Emission rates from heater 21H17 shall not exceed any of the following: PM10: 5.1 lb/day, SOx (as SO2): 19.1 lb/day, VOC: 3.3 lb/day, NOx (as NO2): 56.7 lb/day or 8,760 lb/year, or CO: 200.2 lb/day or 16,365 lb/year. [District NSR Rule] Federally Enforceable Through Title V Permit

23. Emission rates from heater 21H18 shall not exceed any of the following: PM10: 6.3 lb/day, SOx (as SO2): 23.7 lb/day, VOC: 4.2 lb/day, NOx (as NO2): 70.6 lb/day, or CO: 62.3 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit

24. For heater 21H11 through 21H18, duration of start-up and shutdown shall not exceed 2 hours each per occurrence. During start-up or shutdown, the emissions control system shall be in operation, and emissions shall be minimized insofar as technologically possible. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

25. If the unit's actual fugitive exceed 14,819 lb VOCs per calendar year the permittee must report to the District the annual VOC emissions as calculated pursuant to paragraph 40 CFR 51.165(a)(6)(iii) and any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection. Such information must be submitted to the District for a period of 5 calendar years beginning the year of operation under ATC S-33-56-32 and shall be submitted within 60 days of the end of each calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit

26. Permittee shall maintain records of duration of each start-up and shutdown for a period of five years and make such records readily available for District inspection upon request. [District Rules 2080, 4305, and 4306] Federally Enforceable Through Title V Permit

27. For heaters 21H13, 21H14, 21H15, 21H16, and 21H17, compliance with annual CO emission rate shall be determined by using CO emission concentrations obtained during monthly monitoring as required in this permit, fuel use, fuel heating value, and stack gas flow rate. Records of calculated CO emissions shall be maintained for a period of five years and made readily available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit

28. For each heater, permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

29. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

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30. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

31. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

32. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306 (amended October 16, 2008). [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

33. Source testing to measure natural gas-combustion NOx and CO emissions from each heater shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

34. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit

35. NOx emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

36. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306, and 4351] Federally Enforceable Through Title V Permit

37. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306, 4351] Federally Enforceable Through Title V Permit

38. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

39. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit

40. Permittee shall meet all applicable NSPS requirements, including Subparts A, J and GGG. [NSPS 40 CFR Part 60, Subparts A & J] Federally Enforceable Through Title V Permit

41. Permittee shall maintain records of hhv of fuel burned and cumulative annual fuel use for a period of five years and shall make such records readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

42. All required source testing shall conform to the compliance testing procedures described in District Rule 1081 (amended December 16, 1993). [District Rule 1081] Federally Enforceable Through Title V Permit

43. Sulfur content (as H2S) of fuel supplied to all heaters shall not exceed 0.1 gr/dscf (162 ppmv) based on a three hour rolling average and shall be continuously monitored and recorded. [NSPS 40 CFR Part 60, Subparts A & J] Federally Enforceable Through Title V Permit

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44. Copies of all fuel invoices, gas purchase contracts, supplier certifications, and test results to determine compliance with the conditions of this permit shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

45. Particulate matter emissions shall not exceed 0.1 grain/dscf, 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rules 4201, 3.1 and 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit

46. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO2. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by source testing in combination with fuel analysis. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit

47. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

48. When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6B; or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

49. If the unit is fired on noncertified gaseous fuel and compliance with SOx emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 4084, D 3246 or grab sample analysis by GC-FPD/TCD performed in the laboratory. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

50. If fuel analysis is used to demonstrate compliance with the conditions of this permit, the fuel higher heating value for each fuel shall be certified by third party fuel supplier or determined by: ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 4305, 6.2.1; 4306, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit

51. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels; or determine that the concentration of sulfur compounds in the exhaust does not exceed the concentration limit by a combination of source testing and fuel analysis. [District Rule 4801 and Kern County Rule 407] Federally Enforceable Through Title V Permit

52. Nitrogen oxide (NOx) emissions shall not exceed 140 lb/hr, calculated as NO2. [District Rules 4301, 5.2.2] Federally Enforceable Through Title V Permit

53. Operators shall not depressurize any vessel containing VOCs unless the process unit turnaround is accomplished by employing one of the following operating procedures: The organic vapors shall either be recovered, added to the refinery fuel gas system and combusted; or controlled and piped to an appropriate firebox or incinerated for combustion; or flared, until the pressure within the process vessel is as close to atmospheric pressure as is possible. All process vessels shall be depressurized into the control facilities to less than 1020 mm Hg (5 psig) before venting/opening to atmosphere. All organic compounds which emerge from a refinery process vessel during the purging of said vessel and which otherwise would be emitted to the atmosphere shall be either directed to a flare or incinerator or shall be used for fuel until such disposition of emissions is not technically feasible or is less safe than atmospheric venting. [District Rule 4454, 4.0] Federally Enforceable Through Title V Permit

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54. The owner or operator may apply to the Administrator for a determination of equivalency for any means of emission limitation that achieves a reduction in emissions of VOC at least equivalent to the reduction in emissions of VOC achieved by the controls required in Subpart GGG. In doing so, the owner or operator shall comply with the requirements of 40 CFR 60.484. [40 CFR 60.592(c)] Federally Enforceable Through Title V Permit

55. Each pump in light liquid service (PLLS) shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485(b), except as provided in 40 CFR 60.482-1(c) and 40 CFR 60.482-2(d), (e), and (f). Each pump in light liquid service shall be checked by visual inspection each calendar week for indications of liquids dripping from the pump seal. A leak is detected if an instrument reading of 10,000 ppm or greater is measured or if there are indications of liquids dripping from the pump seal. [40 CFR 60.482-2(a) and (b)] Federally Enforceable Through Title V Permit

56. When a leak is detected for each PLLS, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. [40 CFR 60.482-2(c)] Federally Enforceable Through Title V Permit

57. Each PLLS equipped with a dual mechanical seal system that includes a barrier fluid system is exempt from the requirements of 40 CFR 60.482-2(a) provided the requirements specified in 40 CFR 60.482-2(d)(1) through (6) are met. [40 CFR 60.482(d)] Federally Enforceable Through Title V Permit

58. Any PLLS that is designated, as described in 40 CFR 60.486(e)(1) and (2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of 40 CFR 60.482-2(a), (c), and (d) if the pump meets the requirements specified in 40 CFR 60.482-2(e)(1), (2), and (3). [40 CFR 60.482-2(e)] Federally Enforceable Through Title V Permit

59. If any PLLS is equipped with a closed vent system capable of capturing and transporting leakage from the seal or seals to a control device that complies with the requirements of 40 CFR 60.482-10, it is exempt from the requirements of 40 CFR 60.482-2(a) through (e). [40 CFR 60.482-2(f)] Federally Enforceable Through Title V Permit

60. Any pump in PLLS that is designated, as described in 40 CFR 60.486(f)(1), as an unsafe-to-monitor pump is exempt from the monitoring and inspection requirements of 40 CFR 60.482-2(a) and 40 CFR 60.482-2(d)(4) through (6) if: 1). The owner or operator of the pump demonstrates that the pump is unsafe-to-monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 60.482-2(a); and 2) The owner or operator of the pump has a written plan that requires monitoring of the pump as frequently as practicable during safe-to-monitor times but not more frequently than the periodic monitoring schedule otherwise applicable, and repair of the equipment according to the procedures in 40 CFR 60.482-2(c) if a leak is detected. [40 CFR 60.482-2(g)] Federally Enforceable Through Title V Permit

61. Any pump that is located within the boundary of an unmanned plant site is exempt from the weekly visual inspection requirement of 40 CFR 60.482-2(a)(2) and (d)(4) and the daily requirements of 40 CFR 60.482-2(d)(5), provided that each pump is visually inspected as often as practicable and at least monthly. [40 CFR 60.482-2(h)] Federally Enforceable Through Title V Permit

62. Except during pressure releases, each pressure relief device in gas/vapor service shall be operated with no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as determined by the methods specified in 40 CFR 60.485(c). [40 CFR 60.482-4(a)] Federally Enforceable Through Title V Permit

63. After each pressure release, the pressure relief device shall be returned to a condition of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, as soon as practicable, but no later than 5 calendar days after the pressure release, except as provided in 40 CFR 60.482-9. No later than 5 calendar days after the pressure release, the pressure relief device shall be monitored to confirm the conditions of no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, by the methods specified in 40 CFR 60.485(c). [40 CFR 60.482-4(b)] Federally Enforceable Through Title V Permit

64. Any pressure relief device that is routed to a process or fuel gas system or equipped with a closed vent system capable of capturing and transporting leakage through the pressure relief device to a control device as described in 40 CFR 60.482-10 is exempted from the requirements of 40 CFR 60.482-4(a) and (b). [40 CFR 60.482-4(c)] Federally Enforceable Through Title V Permit

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65. Any pressure relief device that is equipped with a rupture disk upstream of the pressure relief device is exempt from the 40 CFR 60.482-4(a) and (b), provided the owner or operator complies with the requirements in 40 CFR 60.482-4(d)(2) of this section. After each pressure release, a new rupture disk shall be installed upstream of the pressure relief device as soon as practicable, but no later than 5 calendar days after each pressure release, except as provided in 40 CFR 60.482-9. [40 CFR 60.482-4(d)] Federally Enforceable Through Title V Permit

66. Except for in-situ sampling systems and sampling systems without purges, each sampling connection system shall be equipped with a closed-purge, closed-loop, or closed-vent system, except as provided in 40 CFR 60.482-1(c). Each closed-purge, closed-loop, or closed-vent system shall comply with the requirements specified in 40 CFR 60.482-5(b)(1), (2), (3), and (4). [40 CFR 60.482-5(a), (b), and (c)] Federally Enforceable Through Title V Permit

67. Each open-ended valve or line shall be equipped with a cap, blind flange, plug, or a second valve, except as provided in 40 CFR 60.482-1(c). The cap, blind flange, plug, or second valve shall seal the open end at all times except during operations requiring process fluid flow through the open-ended valve or line. When a double block-and-bleed system is being used, the bleed valve or line may remain open during operations that require venting the line between the block valves but shall comply with this condition at all other times. [40 CFR 60.482-6(a) and (c)] Federally Enforceable Through Title V Permit

68. Each open-ended valve or line equipped with a second valve shall be operated in a manner such that the valve on the process fluid end is closed before the second valve is closed. [40 CFR 60.482-6(b)] Federally Enforceable Through Title V Permit

69. Open-ended valves or lines in an emergency shutdown system which are designed to open automatically in the event of a process upset are exempt from the requirements of 40 CFR 60.482-6(a), (b) and (c). [40 CFR 60.482-6(d)] Federally Enforceable Through Title V Permit

70. Open-ended valves or lines containing materials which would autocatalytically polymerize or would present an explosion, serious overpressure, or other safety hazard if capped or equipped with a double block and bleed system as specified in 40 CFR 60.482-6(a) through (c) are exempt from the requirements of 40 CFR 60.482-6(a) through (c). [40 CFR 60.482-6(e)] Federally Enforceable Through Title V Permit

71. Each valve in gas/vapor service and in light liquid service shall be monitored monthly to detect leaks by the methods specified in 40 CFR 60.485(b) and shall comply with 40 CFR 60.482-7(b) through (e), except as provided in 40 CFR 60.482-7(f), (g), and (h), 40 CFR 60.483-1, 40 CFR 60.483-2, and 40 CFR 60.482-1(c). A leak is detected if an instrument reading of 10,000 ppm or greater is measured. [40 CFR 60.482-7(a) and (b)] Federally Enforceable Through Title V Permit

72. Any valve in gas/vapor service or in light liquid service for which a leak is not detected for 2 successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for 2 successive months. [40 CFR 60.482-7(c)] Federally Enforceable Through Title V Permit

73. When a leak is detected for any valve in gas/vapor service or in light liquid service, it shall be repaired as soon as practicable, but no later than 15 calendar days after the leak is detected, except as provided in 40 CFR 60.482-9. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the best practices specified in 40 CFR 60.482-7(e)(1), (2), (3), and (4), where practicable. [40 CFR 60.482-7(d) and (e)] Federally Enforceable Through Title V Permit

74. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486(e)(2), for no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background, is exempt from the requirements of 40 CFR 60.482-7(a) if the valve meets the requirements specified in 40 CFR 60.482-7(f)(1), (2), and (3). [40 CFR 60.482-7(f)] Federally Enforceable Through Title V Permit

75. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486(f)(1), as an unsafe-to-monitor valve is exempt from the requirements of 40 CFR 60.482-7(a) if: 1) The owner or operator of the valve demonstrates that the valve is unsafe to monitor because monitoring personnel would be exposed to an immediate danger as a consequence of complying with 40 CFR 60.482-7(a); and 2) The owner or operator of the valve adheres to a written plan that requires monitoring of the valve as frequently as practicable during safe-to-monitor times. [40 CFR 60.482-7(g)] Federally Enforceable Through Title V Permit

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76. Any valve in gas/vapor service or in light liquid service that is designated, as described in 40 CFR 60.486(f)(2), as a difficult-to-monitor valve is exempt from the requirements of 40 CFR 60.482-7(a) if: 1) The owner or operator of the valve demonstrates that the valve cannot be monitored without elevating the monitoring personnel more than 2 meters above a support surface; 2) The process unit within which the valve is located either becomes an affected facility through 40 CFR 60.14 or 40 CFR 60.15 or the owner or operator designates less than 3.0 percent of the total number of valves as difficult-to-monitor; and 3) The owner or operator of the valve follows a written plan that requires monitoring of the valve at least once per calendar year. [40 CFR 60.482-7(h)] Federally Enforceable Through Title V Permit

77. The owner or operator may elect to comply with the applicable provisions for valves in gas/vapor service and in light liquid service as specified in 40 CFR 60.483-1 and 60.483-2. [40 CFR 60.592(b)] Federally Enforceable Through Title V Permit

78. If evidence of a potential leak is found by visual, audible, olfactory, or any other detection method at pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, the owner or operator shall follow either one of the following procedures: 1) The owner or operator shall monitor the equipment within 5 days by the method specified in 40 CFR 60.485(b) and shall comply with the requirements of 40 CFR 60.482-8(b) through (d); or 2) The owner or operator shall eliminate the visual, audible, olfactory, or other indication of a potential leak. A leak is detected if an instrument reading of 10,000 ppm or greater is measured. [40 CFR 60.482-8(a) and (b)] Federally Enforceable Through Title V Permit

79. When a leak is detected in pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and connectors, it shall be repaired as soon as practicable, but not later than 15 calendar days after it is detected, except as provided in 40 CFR 60.482-9. The first attempt at repair shall be made no later than 5 calendar days after each leak is detected. First attempts at repair include, but are not limited to, the best practices described under 40 CFR 60.482-7(e). [40 CFR 60.482-8(c) and (d)] Federally Enforceable Through Title V Permit

80. For closed vent systems and control devices, vapor recovery systems shall be designed and operated to recover the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, whichever is less stringent. [40 CFR 60.482-10(b)] Federally Enforceable Through Title V Permit

81. For closed vent systems and control devices, enclosed combustion devices shall be designed and operated to reduce the VOC emissions vented to them with an efficiency of 95 percent or greater, or to an exit concentration of 20 parts per million by volume, on a dry basis, corrected to 3 percent oxygen, whichever is less stringent or to provide a minimum residence time of 0.75 seconds at a minimum temperature of 816 degrees C. [40 CFR 60.482-10(c)] Federally Enforceable Through Title V Permit

82. Flares used to comply with Subpart GGG shall comply with the requirements of 40 CFR 60.18. [40 CFR 60.482-10(d)] Federally Enforceable Through Title V Permit

83. Owners or operators of control devices used to comply with the provisions of Subpart GGG shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs. [40 CFR 60.482-10(e)] Federally Enforceable Through Title V Permit

84. Except as provided in 40 CFR 60.482-10(i) through (k), each closed vent system used to comply with the provisions of Subpart GGG shall be inspected according to the procedures and schedule specified in 40 CFR 60.482-10(f)(1) and (f)(2). Leaks, as indicated by an instrument reading greater than 500 parts per million by volume above background or by visual inspections, shall be repaired as soon as practicable except as provided in 40 CFR 60.482-10(h). A first attempt at repair shall be made no later than 5 calendar days after the leak is detected. Repair shall be completed no later than 15 calendar days after the leak is detected. [40 CFR 60.482-10(f) and (g)] Federally Enforceable Through Title V Permit

85. Delay of repair of a closed vent system for which leaks have been detected is allowed if the repair is technically infeasible without a process unit shutdown or if the owner or operator determines that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. Repair of such equipment shall be complete by the end of the next process unit shutdown. [40 CFR 60.482-10(h)] Federally Enforceable Through Title V Permit

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86. If a vapor collection system or closed vent system is operated under a vacuum, it is exempt from the inspection requirements of 40 CFR 60.482-10(f)(1)(i) and (f)(2). [40 CFR 60.482-10(i)] Federally Enforceable Through Title V Permit

87. Any parts of the closed vent system that are designated, as described in 40 CFR 60.482-10(l)(1), as unsafe to inspect are exempt from the inspection requirements of 40 CFR 60.482-10(f)(1)(i) and (f)(2) if they comply with the requirements specified in 40 CFR 60.482-10 (j)(1) and (j)(2). [40 CFR 60.482-10(j)] Federally Enforceable Through Title V Permit

88. Any parts of the closed vent system that are designated, as described in 40 CFR 60.482-10(l)(2), as difficult to inspect are exempt from the inspection requirements of 40 CFR 60.482-10(f)(1)(i) and (f)(2) if they comply with the requirements specified in 40 CFR 60.482-10(k)(1) through (k)(3). [40 CFR 60.482-10(k)] Federally Enforceable Through Title V Permit

89. The owner or operator shall record the following information: 1) Identification of all parts of the closed vent system that are designated as unsafe to inspect, an explanation of why the equipment is unsafe to inspect, and the plan for inspecting the equipment; 2) Identification of all parts of the closed vent system that are designated as difficult to inspect, an explanation of why the equipment is difficult to inspect, and the plan for inspecting the equipment; 3) For each inspection during which a leak is detected, a record of the information specified in 40 CFR 60.486(c); 4) For each inspection conducted in accordance with 40 CFR 60.485(b) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected; and 5) For each visual inspection conducted in accordance with 40 CFR 60.482-10(f)(1)(ii) during which no leaks are detected, a record that the inspection was performed, the date of the inspection, and a statement that no leaks were detected. [40 CFR 60.482-10(l)] Federally Enforceable Through Title V Permit

90. Closed vent systems and control devices used to comply with provisions Subpart GGG shall be operated at all times when emissions may be vented to them. [40 CFR 60.482-10(m)] Federally Enforceable Through Title V Permit

91. In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in 40 CFR 60, Appendix A or other methods and procedures as specified in 40 CFR 60.485, except as provided in 40 CFR 60.8(b). [40 CFR 60.485(a)] Federally Enforceable Through Title V Permit

92. The owner or operator shall determine compliance with the standards in 40 CFR 60.482, 60.483, and 60.484 as follows: Method 21 shall be used to determine the presence of leaking sources. The instrument shall be calibrated before use each day of its use by the procedures specified in Method 21. The following calibration gases shall be used: (i) Zero air (less than 10 ppm of hydrocarbon in air); and (ii) A mixture of methane or n-hexane and air at a concentration of about, but less than, 10,000 ppm methane or n-hexane. [40 CFR 60.485(b)] Federally Enforceable Through Title V Permit

93. The owner or operator shall determine compliance with the no detectable emission standards in 40 CFR 60.482-2(e), 60.482-3(i), 60.482-4, 60.482-7(f), and 60.482-10(e) as follows: 1) The requirements of 40 CFR 60.485(b) shall apply. 2) Method 21 shall be used to determine the background level. All potential leak interfaces shall be traversed as close to the interface as possible. The arithmetic difference between the maximum concentration indicated by the instrument and the background level is compared with 500 ppm for determining compliance. [40 CFR 60.485(c)] Federally Enforceable Through Title V Permit

94. The owner or operator shall test each piece of equipment unless demonstrated that a process unit is not in VOC service, i.e., that the VOC content would never be reasonably expected to exceed 10 percent by weight. For purposes of this demonstration, the following methods and procedures shall be used: 1) Procedures that conform to the general methods in ASTM E260-73, 91, or 96, E168-67, 77, or 92, E169-63, 77, or 93 (incorporated by reference as seen in 40 CFR 60.17) shall be used to determine the percent VOC content in the process fluid that is contained in or contacts a piece of equipment; 2) Organic compounds that are considered by the Administrator to have negligible photochemical reactivity may be excluded from the total quantity of organic compounds in determining the VOC content of the process fluid; and 3) Engineering judgment may be used to estimate the VOC content, if a piece of equipment had not been shown previously to be in service. If the Administrator disagrees with the judgment, the previous two procedures as specified in 40 CFR 60.485(d)(1) and (2) shall be used to resolve the disagreement. [40 CFR 60.485(d)] Federally Enforceable Through Title V Permit

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95. The owner or operator shall demonstrate that an equipment is in light liquid service by showing that all the following conditions apply: 1) The vapor pressure of one or more of the components is greater than 0.3 kPa at 20 degrees C (1.2 in. H2O at 68 degrees F). Standard reference texts or ASTM D2879-83, 96, or 97 (incorporated by reference as seen in 40 CFR 60.17) shall be used to determine the vapor pressures; 2) The total concentration of the pure components having a vapor pressure greater than 0.3 kPa at 20 degrees Celsius is equal to or greater than 20 percent by weight; and 3) The fluid is a liquid at operating conditions. [40 CFR 60.485(e)] Federally Enforceable Through Title V Permit

96. Samples used in conjunction with 40 CFR 60.485(d), (e), and (g) shall be representative of the process fluid that is contained in or contacts the equipment or the gas being combusted in the flare. [40 CFR 60.485(f)] Federally Enforceable Through Title V Permit

97. The owner or operator shall determine compliance with the standards of flares as specified in 40 CFR 60.485(g)(1), (2), (3), (4), (5), (6), and (7). [40 CFR 60.485(g)] Federally Enforceable Through Title V Permit

98. An owner or operator of more than one affected facility subject to the provisions Subpart GGG may comply with the recordkeeping requirements for these facilities in one recordkeeping system if the system identifies each record by each facility. [40 CFR 60.486(a)] Federally Enforceable Through Title V Permit

99. When each leak is detected as specified in 40 CFR 60.482-2, 60.482-3, 60.482-7, 60.482-8, and 60.483-2, the following requirements apply: 1) A weatherproof and readily visible identification, marked with the equipment identification number, shall be attached to the leaking equipment; 2) The identification on a valve may be removed after it has been monitored for 2 successive months as specified in 40 CFR 60.482-7(c) and no leak has been detected during those 2 months; and 3) The identification on equipment except on a valve, may be removed after it has been repaired. [40 CFR 60.486(b)] Federally Enforceable Through Title V Permit

100. When each leak is detected as specified in 40 CFR 60.482-2, 60.482-3, 60.482-7, 60.482-8, and 60.483-2, the following information shall be recorded in a log and shall be kept for 5 years in a readily accessible location: 1) The instrument and operator identification numbers and the equipment identification number; 2) The date the leak was detected and the dates of each attempt to repair the leak; 3) Repair methods applied in each attempt to repair the leak; 4) ``Above 10,000" if the maximum instrument reading measured by the methods specified in 40 CFR 60.485(a) after each repair attempt is equal to or greater than 10,000 ppm; 5) ``Repair delayed" and the reason for the delay if a leak is not repaired within 15 calendar days after discovery of the leak; 6) The signature of the owner or operator (or designate) whose decision it was that repair could not be effected without a process shutdown; 7) The expected date of successful repair of the leak if a leak is not repaired within 15 days; 8) Dates of process unit shutdown that occur while the equipment is unrepaired; and 9) The date of successful repair of the leak. [40 CFR 60.486(c) and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

101. The following information pertaining to the design requirements for closed vent systems and control devices described in 40 CFR 60.482-10 shall be recorded and kept in a readily accessible location: 1) Detailed schematics, design specifications, and piping and instrumentation diagrams; 2) The dates and descriptions of any changes in the design specifications; 3) A description of the parameter or parameters monitored, as required in 40 CFR 60.482-10(e), to ensure that control devices are operated and maintained in conformance with their design and an explanation of why that parameter (or parameters) was selected for the monitoring; 4) Periods when the closed vent systems and control devices required in 40 CFR 60.482-2, 60.482-3, 60.482-4, and 60.482-5 are not operated as designed, including periods when a flare pilot light does not have a flame; and 5) Dates of startups and shutdowns of the closed vent systems and control devices required in 40 CFR 60.482-2, 60.482-3, 60.482-4, and 60.482-5. [40 CFR 60.486(d)] Federally Enforceable Through Title V Permit

102. The following information pertaining to all equipment subject to the requirements in 40 CFR 60.482-1 to 60.482-10 shall be recorded in a log that is kept in a readily accessible location: 1) A list of identification numbers for equipment subject to the requirements of Subpart GGG; 2) (i) A list of identification numbers for equipment that are designated for no detectable emissions under the provisions of 40 CFR 60.482-2(e), 60.482-3(i) and 60.482-7(f). (ii) The designation of equipment as subject to the requirements of 40 CFR 60.482-2(e), 60.482-3(i) and 60.482-7(f) shall be signed by the owner or operator; 3) A list of equipment identification numbers for pressure relief devices required to comply with 60.482-4; 4) (i) The dates of each compliance test as required in 40 CFR 60.482-2(e), 60.482-3(i), 60.482-4, and 60.482-7(f). (ii) The background level measured during each compliance test. (iii) The maximum instrument reading measured at the equipment during each compliance test; and 5) A list of identification numbers for equipment in vacuum service. [40 CFR 60.486(e)] Federally Enforceable Through Title V Permit

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103. The following information pertaining to all valves subject to the requirements of 40 CFR 60.482-7(g) and (h) and to all pumps subject to the requirements of 40 CFR 60.482-2(g) shall be recorded in a log that is kept in a readily accessible location: 1) A list of identification numbers for valves and pumps that are designated as unsafe-to-monitor, an explanation for each valve or pump stating why the valve or pump is unsafe-to-monitor, and the plan for monitoring each valve or pump; and 2) A list of identification numbers for valves that are designated as difficult-to-monitor, an explanation for each valve stating why the valve is difficult-to-monitor, and the schedule for monitoring each valve. [40 CFR 60.486(f)] Federally Enforceable Through Title V Permit

104. The following information shall be recorded for valves complying with 40 CFR 60.483-2: 1) A schedule of monitoring; 2) The percent of valves found leaking during each monitoring period. [40 CFR 60.486(g)] Federally Enforceable Through Title V Permit

105. The following information shall be recorded in a log that is kept in a readily accessible location: 1) Design criterion required in 40 CFR 60.482-2(d)(5) and 60.482-3(e)(2) and explanation of the design criterion; and 2) Any changes to this criterion and the reasons for the changes. [40 CFR 60.486(h)] Federally Enforceable Through Title V Permit

106. The following information shall be recorded in a log that is kept in a readily accessible location for use in determining exemptions as provided in 40 CFR 60.480(d): 1) An analysis demonstrating the design capacity of the affected facility; 2) A statement listing the feed or raw materials and products from the affected facilities and an analysis demonstrating whether these chemicals are heavy liquids or beverage alcohol; and 3) An analysis demonstrating that equipment is not in VOC service. [40 CFR 60.486(i)] Federally Enforceable Through Title V Permit

107. Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location. [40 CFR 60.486(j)] Federally Enforceable Through Title V Permit

108. The provisions of 40 CFR 60.7 (b) and (d) do not apply to affected facilities subject to Subpart GGG. [District 40 CFR 60.486(k)] Federally Enforceable Through Title V Permit

109. All semiannual reports to the Administrator shall include the following information, summarized from the information in 40 CFR 60.486: 1) Process unit identification; 2) For each month during the semiannual reporting period, i) Number of valves for which leaks were detected as described in 40 CFR 60.482-7(b) or 40 CFR 60.483-2, (ii) Number of valves for which leaks were not repaired as required in 40 CFR 60.482-7(d)(1), (iii) Number of pumps for which leaks were detected as described in 40 CFR 60.482-2(b) and (d)(6)(i), (iv) Number of pumps for which leaks were not repaired as required in 40 CFR 60.482-2(c)(1) and (d)(6)(ii), (v) Number of compressors for which leaks were detected as described in 40 CFR 60.482-3(f), (vi) Number of compressors for which leaks were not repaired as required in 40 CFR 60.482-3(g)(1), and (vii) The facts that explain each delay of repair and, where appropriate, why a process unit shutdown was technically infeasible; 3) Dates of process unit shutdowns which occurred within the semiannual reporting period; 4) Revisions to items reported in the semiannual report if changes have occurred since the initial report, as required in 40 CFR 60.487 (a) and (b), or subsequent revisions to the initial report. [40 CFR 60.487(c)] Federally Enforceable Through Title V Permit

110. An owner or operator electing to comply with the provisions of 40 CFR 60.483-1 and 60.483-2 shall notify the Administrator of the alternative standard selected 90 days before implementing either of the provisions. [40 CFR 60.487(d)] Federally Enforceable Through Title V Permit

111. An owner or operator shall report the results of all performance tests in accordance with 40 CFR 60.8 of the General Provisions. The provisions of 40 CFR 60.8(d) do not apply to affected facilities subject to the provisions of Subpart GGG except that an owner or operator must notify the Administrator of the schedule for the initial performance tests at least 30 days before the initial performance tests. [40 CFR 60.487(e)] Federally Enforceable Through Title V Permit

112. The semiannual reporting requirements of 40 CFR 60.487(a), (b), and (c) remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternative means of compliance surveillance adopted by such State. In that event, affected sources within the State will be relieved of the obligation to comply with the requirements of 40 CFR 60.487(a), (b), and (c), provided that they comply with the requirements established by the State. [40 CFR 60.487(f)] Federally Enforceable Through Title V Permit

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113. Compressors are exempt from the standards of Subpart GGG if the owner or operator demonstrates that a compressor is in hydrogen service. Each compressor is presumed not to be in hydrogen service unless an owner or operator demonstrates that the piece of equipment is in hydrogen service. For a piece of equipment to be considered in hydrogen service, it must be determined that the percent hydrogen content can be reasonably expected always to exceed 50 percent by volume. For purposes of determining the percent hydrogen content in the process fluid that is contained in or contacts a compressor, procedures that conform to the general method described in ASTM E-260, E-168, or E-169 shall be used. An owner or operator may use engineering judgment demonstrate that the percent content exceeds 50 percent by volume, provided the engineering judgment demonstrates that the content clearly exceeds 50 percent by volume. When an owner or operator and the Administrator do not agree on whether a piece of equipment is in hydrogen service, however, the procedures that conform to the general method described in ASTM E-260, E-168, or E-169 shall be used to resolve the disagreement. If an owner or operator determines that a piece of equipment is in hydrogen service, the determination can be revised only after following the procedures that conform to the general method described in ASTM E-260, E-168, or E-169. [40 CFR 60.593(b)] Federally Enforceable Through Title V Permit

114. Any existing reciprocating compressor that becomes an affected facility under provisions of 40 CFR 60.14 or 40 CFR 60.15 is exempt from 40 CFR 60.482-3 (a), (b), (c), (d), (e), and (h) provided the owner or operator demonstrates that recasting the distance piece or replacing the compressor are the only options available to bring the compressor into compliance with the provisions of 40 CFR 60.482-3 (a), (b), (c), (d), (e), and (h). [40 CFR 60.593(c)] Federally Enforceable Through Title V Permit

115. An owner or operator may use the following provision in addition to 40 CFR 60.485(e): Equipment is in light liquid service if the percent evaporated is greater than 10 percent at 150 degrees C as determined by ASTM Method D86-78, 82, 90, 95, or 96. [40 CFR 60.593(d)] Federally Enforceable Through Title V Permit

116. Equipment that is in vacuum service is excluded from the requirements of 40 CFR 60.482-2 to 40 CFR 60.482-10 if it is identified as required in 40 CFR 60.486(e)(5). [40 CFR 60.482-1(d)] Federally Enforceable Through Title V Permit

117. For fuel gas combustion devices, a continuous emissions monitoring system shall be installed, calibrated, operated, and reported according to EPA guidelines as specified under 40 CFR 60.105(a)(3). CEM results shall be calculated on a rolling three (3) hour basis. [40 CFR 60, 60.105(a)(3)] Federally Enforceable Through Title V Permit

118. For fuel gas combustion devices, operator shall report all rolling 3-hour periods during which the average concentration of H2S as measured by the H2S continuous monitoring system exceeds 0.10 gr/dscf (230 mg/dscm) or during which the average concentration of SO2 as measured by the SO2 continuous monitoring system exceeds 20 ppm (dry basis, zero percent excess air). [40 CFR 60.105(e)(3)] Federally Enforceable Through Title V Permit

119. Operator shall determine compliance with the H2S standard using EPA Methods 11, 15, 15A, or 16. [40 CFR 60.106(e)] Federally Enforceable Through Title V Permit

120. For any periods for which sulfur dioxide or oxides emissions data are not available, the operator shall submit a signed statement indicating if any changes were made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit. Operations of the control system and affected facility during periods of data unavailability are to be compared with operation of the control system and affected facility before and following the period of data unavailability. [40 CFR 60.107(d)] Federally Enforceable Through Title V Permit

121. The owner or operator shall submit the reports required under this subpart to the District semiannually for each six-month period. All semiannual reports shall be postmarked by the 30th day following the end of each six-month period. The owner or operator shall submit a signed statement certifying the accuracy and completeness of the information contained in the report. [40 CFR 60.107(e) and 60.107(f)] Federally Enforceable Through Title V Permit

122. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320] Federally Enforceable Through Title V Permit

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123. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and 4320] Federally Enforceable Through Title V Permit

124. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 4305, and 4306] Federally Enforceable Through Title V Permit

125. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

126. Compliance with permit conditions in the Title V permit shall be deemed compliance with 40 CFR 60 Subpart GGG. A permit shield is granted from this requirement. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

127. The operator shall be in compliance with the applicable requirement in Sections 5.4.1 of District Rule 4320 (Adopted 10/16/2008) no later than July 1, 2013. [District Rule 4320, 5.4.1] Federally Enforceable Through Title V Permit

128. Except for complying with the applicable requirements of Sections 6.1 and 7.3, the requirements of this rule shall not apply to 1) components subject to Rule 4623 (adopted 5/19/05), 2) pressure relief devices, pumps, and compressors equipped with a closed vent system as defined in Section 3.0, 3) components buried below ground, 4) components exclusively handling liquid streams which have less than 10 percent by weight (<10 wt%) evaporation at 150 C, 5) components exclusively handling liquid streams with a VOC content less than ten percent by weight (<10 wt%), 6) components exclusively handling gas/vapor streams with a VOC content of less than one percent by weight (<1wt%), 7) components incorporated in lines exclusively in vacuum service, 8) components exclusively handling commercial natural gas, and 9) one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the Air Pollution Control Officer (APCO) to be leak-free based on initial inspection. [District Rule 4455, 4.1 & 4.2] Federally Enforceable Through Title V Permit

129. The operator shall not use any component that leaks in excess of the allowable leak standards of this rule, or is found to be in violation of the provisions specified in Section 5.1.3. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the rule. [District Rule 4455, 5.1.1] Federally Enforceable Through Title V Permit

130. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2] Federally Enforceable Through Title V Permit

131. The operator shall be in violation of this rule if any District inspection demonstrates that one or more of the conditions in Sections 5.1.4 exist at the facility. [District Rule 4455, 5.1.3.1] Federally Enforceable Through Title V Permit

132. Except for annual operator inspection described in Section 5.1.3.2.3, any operator inspection that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall not constitute a violation of this rule if the leaking components are repaired as soon as practicable but not later than the time frame specified in this rule. Such components shall not be counted towards determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.1] Federally Enforceable Through Title V Permit

133. Leaking components detected during operator inspection pursuant Section 5.1.3.2.1 that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.2] Federally Enforceable Through Title V Permit

134. Any operator inspection conducted annually for a component type (including operator annual inspections pursuant to Section 5.2.5, 5.2.6, 5.2.7, or 5.2.8) that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall constitute a violation of this rule regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this rule. [District Rule 4455, 5.1.3.2.3] Federally Enforceable Through Title V Permit

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135. A component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. [District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

136. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be reinspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the rule. [District Rule 4455, 5.2.1 & 5.2.2] Federally Enforceable Through Title V Permit

137. The operator shall inspect all components at least once every calendar quarter, except for inaccessible components, unsafe-to-monitor components and pipes. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5, 5.2.6, and 5.2.7. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6 & 5.2.7] Federally Enforceable Through Title V Permit

138. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs which shall continue to be inspected on a quarterly basis. [District Rule 4455, 5.2.8] Federally Enforceable Through Title V Permit

139. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five (5) calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 & 5.2.10] Federally Enforceable Through Title V Permit

140. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11] Federally Enforceable Through Title V Permit

141. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12] Federally Enforceable Through Title V Permit

142. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. Any attempt by an operator to count such District inspections as part of the mandatory operator's inspections is considered to be willful circumvention and is a violation of this rule. [District Rule 4455, 5.2.13] Federally Enforceable Through Title V Permit

143. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag that contains the information specified in Section 5.3.3. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected; and is found to be in compliance with the requirements of this rule. [District Rule 4455, 5.3.1, 5.3.2 & 5.3.3] Federally Enforceable Through Title V Permit

144. An operator shall minimize all component leaks immediately to the extent possible, but not later than one (1) hour after detection of leaks in order to stop or reduce leakage to the atmosphere. [District Rule 4455, 5.3.4] Federally Enforceable Through Title V Permit

145. If the leak has been minimized but the leak still exceeds the applicable leak standards of this rule, an operator shall repair or replace the leaking component, vent the leaking component to a closed vent system, or remove the leaking component from operation as soon as practicable but not later than the time period specified in Table 3. For each calendar quarter, the operator may be allowed to extend the repair period as specified in Table 3, for a total number of leaking components, not to exceed 0.05 percent of the number of components inspected, by type, rounded upward to the nearest integer where required. [District Rule 4455, 5.3.5] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

146. If the leaking component is an essential component or a critical component and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized, but the leak still exceeds any of the applicable leak standards of this rule, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6] Federally Enforceable Through Title V Permit

147. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or any combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall comply with at least one of the requirements specified in Sections 5.3.7.1, 5.3.7.2, 5.3.7.3, or 5.3.7.4 by the applicable deadlines specified in Sections 5.3.7.5 and 5.3.7.6. If the original leaking component is replaced with a new like-in-kind component before incurring five repair actions for major leaks within 12-consecutive months, the repair count shall start over for the new component. An entire compressor or pump need not be replaced provided the compressor part(s) or pump part(s) that have incurred five repair actions as described in Section 5.3.7 are brought into compliance with at least one of the requirements of Sections 5.3.7.1 through 5.3.7.6. [District Rule 4455, 5.3.7] Federally Enforceable Through Title V Permit

148. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1] Federally Enforceable Through Title V Permit

149. After a release from a process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. For refineries processing greater than 20,000 barrels of crude oil per day, any subsequent release in excess of 500 pounds of VOC within a continuous 24-hour period shall be subject to the requirements of Section 5.4.5. [District Rule 4455, 5.4.3 & 5.4.4] Federally Enforceable Through Title V Permit

150. The operator of a refinery processing greater than 20,000 barrels of crude oil per day shall connect all process PRDs serving that process equipment to an APCO-approved closed vent system as defined in Section 3.0 if any of the conditions specified in Sections 5.4.5.1 and 5.4.5.2 occurs. Process PRDs subject to the provisions of Section 5.4.5 shall be connected to an APCO-approved closed-vent system as soon as practicable, but no later than the first turnaround after the requirement to connect becomes effective. [District Rule 4455, 5.4.5] Federally Enforceable Through Title V Permit

151. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the APCO that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. The operator shall comply with the requirements of Sections 6.1.4 if there is any change in the description of major components or critical components. [District Rule 4455, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit

152. The operator shall keep a copy of the operator management plan at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved operator management plan. [District Rule 4455, 6.1.2 & 6.1.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

153. The operator shall maintain an inspection log containing, at a minimum, 1) total number of components inspected, and total number and percentage of leaking components found by component types, 2) location, type, name or description of each leaking component, and description of any unit where the leaking component is found, 3) date of leak detection and method of leak detection, 4) for gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, 5) date of repair, replacement, or removal from operation of leaking components, 6) identification and location of essential component and critical components found leaking that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 7) methods used to minimize the leak from essential components and critical components that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 8) after the component is repaired or is replaced, the date of reinspection and the leak concentration in ppmv, 9) inspector's name, business mailing address, and business telephone number, and 10) the facility operator responsible for the inspection and repair program shall sign and date the inspection log certifying the accuracy of the information recorded in the log. [District Rule 4455, 6.2.1] Federally Enforceable Through Title V Permit

154. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, analyzer reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration. [District Rule 4455, 6.2.3] Federally Enforceable Through Title V Permit

155. The operator shall notify the APCO, by telephone or other methods approved by the APCO, of any process PRD release described in Sections 5.4.4 and 5.4.5, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. [District Rule 4455, 6.3.1] Federally Enforceable Through Title V Permit

156. The operator shall submit a written report to the APCO within thirty (30) calendar days following a PRD release subject to 6.3.1. The written report shall include 1) process PRD type, size, and location, 2) date, time and duration of the process PRD release, 3) types of VOC released and individual amounts, in pounds, including supporting calculations, 4) cause of the process PRD release, and 5) corrective actions taken to prevent a subsequent process PRD release. [District Rule 4455 6.3.2] Federally Enforceable Through Title V Permit

157. Copies of all records shall be retained for a minimum of five (5) years after the date of an entry. Such records shall be made available to the APCO, ARB, or US EPA upon request. [District Rule 4455, 6.2.2, 6.2.3 & 6.2.4] Federally Enforceable Through Title V Permit

158. Equivalent test methods other than specified in Sections 6.4.1 through 6.4.5 may be used provided such test methods have received prior approval from the US EPA, ARB, and APCO. [District Rule 4455, 6.4] Federally Enforceable Through Title V Permit

159. Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4455, 6.4.1] Federally Enforceable Through Title V Permit

160. The VOC content shall be determined using American Society of Testing and Materials (ASTM) D 1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304 for liquids. [District Rule 4455, 6.4.2] Federally Enforceable Through Title V Permit

161. The percent by volume liquid evaporated at 150 C shall be determined using ASTM D 86. [District Rule 4455, 6.4.3] Federally Enforceable Through Title V Permit

162. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4455, 6.4.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

163. Halogenated exempt compounds shall be analyzed by US EPA Method 18 or ARB Method 422 "Determination of Volatile Organic Compounds in Emission from Stationary Sources". [District Rule 4455, 6.4.5] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-33-63-14 **EXPIRATION DATE:** 08/31/2022

SECTION: 28 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:
SOUR WATER AND OILY WASTEWATER OPERATION INCLUDING HYDROCRACKER AND PHENOLIC SOUR WATER STRIPPING, PHOSAM UNIT, OIL WASTEWATER CLASSIFIER (83D-13), AND MISCELLANEOUS TANKS AND ASSOCIATED PIPING - AREA 2

PERMIT UNIT REQUIREMENTS

1. Off-gas from adsorber and stripper columns shall be processed in sulfur recovery plants. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Oil skims tank shall receive liquids exclusively from classifier tank #86-J-62. Liquid throughput for oil skims tank shall not exceed 750 gallons per day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. True vapor pressure (TVP) of any liquid placed, stored, or held in the oil skims tank or the classifier tank #86-J-62 shall not exceed 1.5 psia at storage temperature. [District NSR Rule and 4623] Federally Enforceable Through Title V Permit
4. Permittee shall maintain records of daily liquid throughput for the oil skims tank. [District Rule 1070] Federally Enforceable Through Title V Permit
5. Pressure/vacuum relief valve on oil skims tank shall be set to 0.5 oz vacuum and 1 oz. pressure. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Except for complying with the applicable requirements of Sections 6.1 and 7.3, the requirements of this rule shall not apply to 1) components subject to Rule 4623 (adopted 5/19/05), 2) pressure relief devices, pumps, and compressors equipped with a closed vent system as defined in Section 3.0, 3) components buried below ground, 4) components exclusively handling liquid streams which have less than 10 percent by weight (<10 wt%) evaporation at 150 C, 5) components exclusively handling liquid streams with a VOC content less than ten percent by weight (<10 wt%), 6) components exclusively handling gas/vapor streams with a VOC content of less than one percent by weight (<1wt%), 7) components incorporated in lines exclusively in vacuum service, 8) components exclusively handling commercial natural gas, and 9) one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the Air Pollution Control Officer (APCO) to be leak-free based on initial inspection. [District Rule 4455, 4.1 & 4.2] Federally Enforceable Through Title V Permit
7. The operator shall not use any component that leaks in excess of the allowable leak standards of this rule, or is found to be in violation of the provisions specified in Section 5.1.3. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the rule. [District Rule 4455, 5.1.1] Federally Enforceable Through Title V Permit
8. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

9. The operator shall be in violation of this rule if any District inspection demonstrates that one or more of the conditions in Sections 5.1.4 exist at the facility. [District Rule 4455, 5.1.3.1] Federally Enforceable Through Title V Permit

10. Except for annual operator inspection described in Section 5.1.3.2.3, any operator inspection that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall not constitute a violation of this rule if the leaking components are repaired as soon as practicable but not later than the time frame specified in this rule. Such components shall not be counted towards determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.1] Federally Enforceable Through Title V Permit

11. Leaking components detected during operator inspection pursuant Section 5.1.3.2.1 that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.2] Federally Enforceable Through Title V Permit

12. Any operator inspection conducted annually for a component type (including operator annual inspections pursuant to Section 5.2.5, 5.2.6, 5.2.7, or 5.2.8) that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall constitute a violation of this rule regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this rule. [District Rule 4455, 5.1.3.2.3] Federally Enforceable Through Title V Permit

13. A component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. [District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

14. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be reinspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the rule. [District Rule 4455, 5.2.1 & 5.2.2] Federally Enforceable Through Title V Permit

15. The operator shall inspect all components at least once every calendar quarter, except for inaccessible components, unsafe-to-monitor components and pipes. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5, 5.2.6, and 5.2.7. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6 & 5.2.7] Federally Enforceable Through Title V Permit

16. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs which shall continue to be inspected on a quarterly basis. [District Rule 4455, 5.2.8] Federally Enforceable Through Title V Permit

17. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five (5) calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 & 5.2.10] Federally Enforceable Through Title V Permit

18. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11] Federally Enforceable Through Title V Permit

19. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

20. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. Any attempt by an operator to count such District inspections as part of the mandatory operator's inspections is considered to be willful circumvention and is a violation of this rule. [District Rule 4455, 5.2.13] Federally Enforceable Through Title V Permit

21. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag that contains the information specified in Section 5.3.3. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected; and is found to be in compliance with the requirements of this rule. [District Rule 4455, 5.3.1, 5.3.2 & 5.3.3] Federally Enforceable Through Title V Permit

22. An operator shall minimize all component leaks immediately to the extent possible, but not later than one (1) hour after detection of leaks in order to stop or reduce leakage to the atmosphere. [District Rule 4455, 5.3.4] Federally Enforceable Through Title V Permit

23. If the leak has been minimized but the leak still exceeds the applicable leak standards of this rule, an operator shall repair or replace the leaking component, vent the leaking component to a closed vent system, or remove the leaking component from operation as soon as practicable but not later than the time period specified in Table 3. For each calendar quarter, the operator may be allowed to extend the repair period as specified in Table 3, for a total number of leaking components, not to exceed 0.05 percent of the number of components inspected, by type, rounded upward to the nearest integer where required. [District Rule 4455, 5.3.5] Federally Enforceable Through Title V Permit

24. If the leaking component is an essential component or a critical component and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized, but the leak still exceeds any of the applicable leak standards of this rule, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6] Federally Enforceable Through Title V Permit

25. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or any combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall comply with at least one of the requirements specified in Sections 5.3.7.1, 5.3.7.2, 5.3.7.3, or 5.3.7.4 by the applicable deadlines specified in Sections 5.3.7.5 and 5.3.7.6. If the original leaking component is replaced with a new like-in-kind component before incurring five repair actions for major leaks within 12-consecutive months, the repair count shall start over for the new component. An entire compressor or pump need not be replaced provided the compressor part(s) or pump part(s) that have incurred five repair actions as described in Section 5.3.7 are brought into compliance with at least one of the requirements of Sections 5.3.7.1 through 5.3.7.6. [District Rule 4455, 5.3.7] Federally Enforceable Through Title V Permit

26. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1] Federally Enforceable Through Title V Permit

27. After a release from a process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. For refineries processing greater than 20,000 barrels of crude oil per day, any subsequent release in excess of 500 pounds of VOC within a continuous 24-hour period shall be subject to the requirements of Section 5.4.5. [District Rule 4455, 5.4.3 & 5.4.4] Federally Enforceable Through Title V Permit

28. The operator of a refinery processing greater than 20,000 barrels of crude oil per day shall connect all process PRDs serving that process equipment to an APCO-approved closed vent system as defined in Section 3.0 if any of the conditions specified in Sections 5.4.5.1 and 5.4.5.2 occurs. Process PRDs subject to the provisions of Section 5.4.5 shall be connected to an APCO-approved closed-vent system as soon as practicable, but no later than the first turnaround after the requirement to connect becomes effective. [District Rule 4455, 5.4.5] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

29. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the APCO that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. The operator shall comply with the requirements of Sections 6.1.4 if there is any change in the description of major components or critical components. [District Rule 4455, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit

30. The operator shall keep a copy of the operator management plan at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved operator management plan. [District Rule 4455, 6.1.2 & 6.1.4] Federally Enforceable Through Title V Permit

31. The operator shall maintain an inspection log containing, at a minimum, 1) total number of components inspected, and total number and percentage of leaking components found by component types, 2) location, type, name or description of each leaking component, and description of any unit where the leaking component is found, 3) date of leak detection and method of leak detection, 4) for gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, 5) date of repair, replacement, or removal from operation of leaking components, 6) identification and location of essential component and critical components found leaking that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 7) methods used to minimize the leak from essential components and critical components that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 8) after the component is repaired or is replaced, the date of reinspection and the leak concentration in ppmv, 9) inspector's name, business mailing address, and business telephone number, and 10) the facility operator responsible for the inspection and repair program shall sign and date the inspection log certifying the accuracy of the information recorded in the log. [District Rule 4455, 6.2.1] Federally Enforceable Through Title V Permit

32. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, analyzer reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration. [District Rule 4455, 6.2.3] Federally Enforceable Through Title V Permit

33. The operator shall notify the APCO, by telephone or other methods approved by the APCO, of any process PRD release described in Sections 5.4.4 and 5.4.5, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. [District Rule 4455, 6.3.1] Federally Enforceable Through Title V Permit

34. The operator shall submit a written report to the APCO within thirty (30) calendar days following a PRD release subject to 6.3.1. The written report shall include 1) process PRD type, size, and location, 2) date, time and duration of the process PRD release, 3) types of VOC released and individual amounts, in pounds, including supporting calculations, 4) cause of the process PRD release, and 5) corrective actions taken to prevent a subsequent process PRD release. [District Rule 4455 6.3.2] Federally Enforceable Through Title V Permit

35. Copies of all records shall be retained for a minimum of five (5) years after the date of an entry. Such records shall be made available to the APCO, ARB, or US EPA upon request. [District Rule 4455, 6.2.2, 6.2.3 & 6.2.4] Federally Enforceable Through Title V Permit

36. Equivalent test methods other than specified in Sections 6.4.1 through 6.4.5 may be used provided such test methods have received prior approval from the US EPA, ARB, and APCO. [District Rule 4455, 6.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

37. Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4455, 6.4.1] Federally Enforceable Through Title V Permit

38. The VOC content shall be determined using American Society of Testing and Materials (ASTM) D 1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304 for liquids. [District Rule 4455, 6.4.2] Federally Enforceable Through Title V Permit

39. The percent by volume liquid evaporated at 150 C shall be determined using ASTM D 86. [District Rule 4455, 6.4.3] Federally Enforceable Through Title V Permit

40. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4455, 6.4.4] Federally Enforceable Through Title V Permit

41. Halogenated exempt compounds shall be analyzed by US EPA Method 18 or ARB Method 422 "Determination of Volatile Organic Compounds in Emission from Stationary Sources". [District Rule 4455, 6.4.5] Federally Enforceable Through Title V Permit

42. Operators shall not depressurize any vessel containing VOCs unless the process unit turnaround is accomplished by employing one of the following operating procedures: The organic vapors shall either be recovered, added to the refinery fuel gas system and combusted; or controlled and piped to an appropriate firebox or incinerated for combustion; or flared, until the pressure within the process vessel is as close to atmospheric pressure as is possible. All process vessels shall be depressurized into the control facilities to less than 1020 mm Hg (5 psig) before venting/opening to atmosphere. All organic compounds which emerge from a refinery process vessel during the purging of said vessel and which otherwise would be emitted to the atmosphere shall be either directed to a flare or incinerator or shall be used for fuel until such disposition of emissions is not technically feasible or is less safe than atmospheric venting. [District Rule 4454, 4.0] Federally Enforceable Through Title V Permit

43. A person shall not use any compartment of any vessel or device operated for the recovery of oil or tar from effluent water, from any equipment which processes, refines, stores or handles petroleum or coal tar products unless such compartments are equipped with one of the following vapor loss control devices, except when gauging or sampling is taking place: 1) A solid cover with all openings sealed and totally enclosing the liquid contents of the compartment, except for such breathing vents as are structurally necessary, 2) A floating pontoon or double-deck type cover, equipped with closure seals that have no holes or tears, installed and maintained so that gaps between the compartment wall and seal shall not exceed one-eighth (1/8) inch for an accumulative length of 97 percent of the perimeter of the tank, and shall not exceed one-half (1/2) inch for an accumulative length of the remaining three (3) percent of the perimeter of the tank. No gap between the compartment wall and the seal shall exceed one-half (1/2) inch, or 3) A vapor recovery system with a combined collection and control efficiency of at least 90 percent by weight. [District Rule 4625, 5.1] Federally Enforceable Through Title V Permit

44. Any gauging and sampling device in the compartment cover shall be equipped with a cover or lid. The cover shall be in a closed position at all times, except when the device is in actual use. [District Rule 4625, 5.2] Federally Enforceable Through Title V Permit

45. All wastewater separator forbays shall be covered. [District Rule 4625, 5.3] Federally Enforceable Through Title V Permit

46. Skimmed oil or tar removed from wastewater separating devices shall be either charged to process units with feed or transferred to a container with a control system with at least 90 percent control efficiency by weight. [District Rule 4625, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

47. Efficiency of VOC control device shall be determined by EPA Test Method 25 and analysis of halogenated exempt compounds shall be by ARB Method 422. [District Rule 4625, 6.1.1] Federally Enforceable Through Title V Permit

48. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

APPENDIX B

Current Permits to Operate (or Outstanding ATC Serving as Base Document)

San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING

AUTHORITY TO CONSTRUCT

PERMIT NO: S-33-124-13 **ISSUANCE DATE:** 04/22/2020

LEGAL OWNER OR OPERATOR: ALON BAKERSFIELD REFINING
MAILING ADDRESS: 6451 ROSEDALE HWY (AREA 1 & 2)
BAKERSFIELD, CA 93308

LOCATION: 6451 ROSEDALE HWY (AREA 1 & 2)
BAKERSFIELD, CA 93308

SECTION: 28 **TOWNSHIP:** 29S **RANGE:** 27E

EQUIPMENT DESCRIPTION:
MODIFICATION OF GAS PLANT #2 INCLUDING AMINE REGENERATION SYSTEM, VOC COALESCER, DRYER SYSTEM, DE-ETHANIZER, DE-PROPANIZER, PIPING TO SRU #1 (PTO #S-33-16) AND MISC. PUMPS, PIPING AND VESSELS: LOWER FUGITIVE EMISSION LEAK DETECTION AND REPAIR THRESHOLD, RE-TRAY DEPROPANIZER COLUMN, INSTALL COALESCER (REISSUED TO NEW OWNER 7/27/2020)

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions: 1st quarter - 1,953 lb, 2nd quarter - 1,954 lb, 3rd quarter - 1,954 lb, and 4th quarter - 1,954 lb. These amounts include the applicable offset ratio specified in Rule 2201 Section 4.8 (as amended 8/15/19) for the ERC specified below. [District Rule 2201] Federally Enforceable Through Title V Permit
3. ERC Certificate Numbers S-4939-1 (or certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Off-gases from HTU #3 desulfurizer stripper (#S-33-52) and HCU debutanizer (#S-33-53) shall be routed to an amine absorber for sulfur removal prior to combustion, except during breakdown conditions pursuant to Rule 1100. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
S-33-124-13 : Jul 27 2020 1:25PM -- SCANDURL : Joint Inspection NOT Required

5. All amine regenerator off-gas from this permit unit shall be desulfurized at SRU #1 (S-33-16) and/or SRU #3 (S-33-338), except during breakdown conditions pursuant to Rule 1100. [District NSR Rule] Federally Enforceable Through Title V Permit

6. VOC emission rate from fugitive components associated with this emissions unit shall not exceed 23.8 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

7. A component shall be considered leaking if one or more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of Rule 4455 exist at the facility. For this permit unit, except for pumps and compressors, a minor gas leak shall be defined for any component listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service as a reading in excess of 100 ppmv above background up to and including a reading of 10,000 ppmv above background. For pumps, compressors and other component types not specifically listed in Rule 4455 Section 3.22 Table 1 in either liquid or gas/vapor service, a minor gas leak shall be defined as a reading in excess of 500 ppmv above background up to and including a reading of 10,000 ppmv above background. Readings shall be taken as methane using a portable hydrocarbon detection instrument and shall be made in accordance with the methods specified in Section 6.4.1 of Rule 4455. [District Rule 2201 and District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

8. Permit holder shall maintain accurate component count and resultant emissions according to CAPCOA's "California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities," Table IV-3a (Feb 1999), Correlation Equations Method. Permit holder shall update such records when new components are approved and installed. Components shall be screened and leak rate shall be measured in accordance with the frequency of inspection specified in Rule 4455 as applicable. [District Rule 2201] Federally Enforceable Through Title V Permit

9. If the unit's actual fugitive emissions exceed 7,792 lb VOCs per calendar year the permittee must report to the District the annual VOC emissions as calculated pursuant to paragraph 40 CFR 51.165(a)(6)(iii) and any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection. Such information must be submitted to the District for a period of 5 calendar years beginning the year of operation under ATC S-33-124-12 and shall be submitted within 60 days of the end of each calendar year. [District Rule 2201] Federally Enforceable Through Title V Permit

10. Compliance with fugitive VOC emission limit shall be demonstrated by annual component count and District approved emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit

11. Fuel oil contribution to total heat input shall not exceed the following percentages: 70% for crude heaters (11H11 and 11H12) and boilers (81B17 and 81B18) and 63% for vacuum heater (18H11). [District NSR Rule] Federally Enforceable Through Title V Permit

12. Permittee shall maintain accurate records of fuel oil contribution to total heat input for crude heaters (11H11 & 11H12), boilers (81B17 & 81B18), and vacuum heater (18H11), and shall make such records readily available for District inspection. [District Rule 1070] Federally Enforceable Through Title V Permit

13. Operators shall not depressurize any vessel containing VOCs unless the process unit turnaround is accomplished by employing one of the following operating procedures: The organic vapors shall either be recovered, added to the refinery fuel gas system and combusted; or controlled and piped to an appropriate firebox or incinerated for combustion; or flared, until the pressure within the process vessel is as close to atmospheric pressure as is possible. All process vessels shall be depressurized into the control facilities to less than 1020 mm Hg (5 psig) before venting/opening to atmosphere. All organic compounds which emerge from a refinery process vessel during the purging of said vessel and which otherwise would be emitted to the atmosphere shall be either directed to a flare or incinerator or shall be used for fuel until such disposition of emissions is not technically feasible or is less safe than atmospheric venting. [District Rule 4454, 4.0] Federally Enforceable Through Title V Permit

14. The operator shall not burn in any fuel gas combustion device any fuel that contains hydrogen sulfide (H2S) in excess of 0.10 gr/dscf (230 mg/dscm) [40 CFR 60.104(a)(1)] Federally Enforceable Through Title V Permit

15. For fuel gas combustion devices, a continuous emissions monitoring system shall be installed, calibrated, operated, and reported according to EPA guidelines as specified under 40 CFR 60.105(a)(3). CEM results shall be calculated on a rolling three (3) hour basis. [40 CFR 60, 60.105(a)(3)] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

16. For fuel gas combustion devices, operator shall report all rolling 3-hour periods during which the average concentration of H2S as measured by the H2S continuous monitoring system exceeds 0.10 gr/dscf (230 mg/dscm) or during which the average concentration of SO2 as measured by the SO2 continuous monitoring system exceeds 20 ppm (dry basis, zero percent excess air). [40 CFR 60.105(e)(3)] Federally Enforceable Through Title V Permit

17. Operator shall determine compliance with the H2S standard using EPA Methods 11, 15, 15A, or 16. [40 CFR 60.106(e)] Federally Enforceable Through Title V Permit

18. For any periods for which sulfur dioxide or oxides emissions data are not available, the operator shall submit a signed statement indicating if any changes were made in operation of the emission control system during the period of data unavailability which could affect the ability of the system to meet the applicable emission limit. Operations of the control system and affected facility during periods of data unavailability are to be compared with operation of the control system and affected facility before and following the period of data unavailability. [40 CFR 60.107(d)] Federally Enforceable Through Title V Permit

19. The owner or operator shall submit the reports required under this subpart to the District semiannually for each six-month period. All semiannual reports shall be postmarked by the 30th day following the end of each six-month period. The owner or operator shall submit a signed statement certifying the accuracy and completeness of the information contained in the report. [40 CFR 60.107(e) and 60.107(f)] Federally Enforceable Through Title V Permit

20. Except for complying with the applicable requirements of Sections 6.1 and 7.3, the requirements of this rule shall not apply to 1) components subject to Rule 4623 (adopted 5/19/05), 2) pressure relief devices, pumps, and compressors equipped with a closed vent system as defined in Section 3.0, 3) components buried below ground, 4) components exclusively handling liquid streams which have less than 10 percent by weight (<10 wt%) evaporation at 150 C, 5) components exclusively handling liquid streams with a VOC content less than ten percent by weight (<10 wt%), 6) components exclusively handling gas/vapor streams with a VOC content of less than one percent by weight (<1wt%), 7) components incorporated in lines exclusively in vacuum service, 8) components exclusively handling commercial natural gas, and 9) one-half inch nominal or less stainless steel tube fittings which have been demonstrated to the Air Pollution Control Officer (APCO) to be leak-free based on initial inspection. [District Rule 4455, 4.1 & 4.2] Federally Enforceable Through Title V Permit

21. The operator shall not use any component that leaks in excess of the allowable leak standards of this rule, or is found to be in violation of the provisions specified in Section 5.1.3. A component identified as leaking in excess of an allowable leak standard may be used provided it has been identified with a tag for repair, has been repaired, or is awaiting re-inspection after repair, within the applicable time period specified within the rule. [District Rule 4455, 5.1.1] Federally Enforceable Through Title V Permit

22. Each hatch shall be closed at all times except during sampling or adding of process material through the hatch, or during attended repair, replacement, or maintenance operations, provided such activities are done as expeditiously as possible and with minimal spillage of material and VOC emissions to the atmosphere. [District Rule 4455, 5.1.2] Federally Enforceable Through Title V Permit

23. The operator shall be in violation of this rule if any District inspection demonstrates that one or more of the conditions in Sections 5.1.4 exist at the facility. [District Rule 4455, 5.1.3.1] Federally Enforceable Through Title V Permit

24. Except for annual operator inspection described in Section 5.1.3.2.3, any operator inspection that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall not constitute a violation of this rule if the leaking components are repaired as soon as practicable but not later than the time frame specified in this rule. Such components shall not be counted towards determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.1] Federally Enforceable Through Title V Permit

25. Leaking components detected during operator inspection pursuant Section 5.1.3.2.1 that are not repaired, replaced, or removed from operation as soon as practicable but not later than the time frame specified in this rule shall be counted toward determination of compliance with the provisions of Section 5.1.4. [District Rule 4455, 5.1.3.2.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

26. Any operator inspection conducted annually for a component type (including operator annual inspections pursuant to Section 5.2.5, 5.2.6, 5.2.7, or 5.2.8) that demonstrates one or more of the conditions in Section 5.1.4 exist at the facility shall constitute a violation of this rule regardless of whether or not the leaking components are repaired, replaced, or removed from operation within the allowable repair time frame specified in this rule. [District Rule 4455, 5.1.3.2.3] Federally Enforceable Through Title V Permit

27. A component shall be considered leaking if one of more of the conditions specified in Sections 5.1.4.1 through 5.1.4.4 of the rule exist at the facility. [District Rule 4455, 5.1.4] Federally Enforceable Through Title V Permit

28. The operator shall audio-visually inspect for leaks all accessible operating pumps, compressors and PRD in service at least once every 24 hours, except when operators do not report to the facility for that given 24 hours. Any identified leak that cannot be immediately repaired shall be reinspected within 24 hours using EPA Method 21. If a leak is found, it shall be repaired as soon as practical but not later than the time frame specified in Table 3 of the rule. [District Rule 4455, 5.2.1 & 5.2.2] Federally Enforceable Through Title V Permit

29. The operator shall inspect all components at least once every calendar quarter, except for inaccessible components, unsafe-to-monitor components and pipes. Inaccessible components, unsafe-to-monitor components and pipes shall be inspected in accordance with the requirements set forth in Sections 5.2.5, 5.2.6, and 5.2.7. New, replaced, or repaired fittings, flanges and threaded connections shall be inspected immediately after being placed into service. [District Rule 4455, 5.2.3, 5.2.4, 5.2.5, 5.2.6 & 5.2.7] Federally Enforceable Through Title V Permit

30. The operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually for a component type, provided the operator meets all the criteria specified in Sections 5.2.8.1 through 5.2.8.3 of the rule. This approval shall apply to accessible component types, specifically designated by the APCO, except pumps, compressors, and PRDs which shall continue to be inspected on a quarterly basis. [District Rule 4455, 5.2.8] Federally Enforceable Through Title V Permit

31. An annual inspection frequency approved by the APCO shall revert to quarterly inspection frequency for a component type if either the operator inspection or District inspection demonstrates that a violation of the provisions of Sections 5.1, 5.2 and 5.3 of the rule exists for that component type, or the APCO issued a Notice of Violation for violating any of the provisions of this rule during the annual inspection period for that component type. When the inspection frequency changes from annual to quarterly inspections, the operator shall notify the APCO in writing within five (5) calendar days after changing the inspection frequency, giving the reason(s) and date of change to quarterly inspection frequency. [District Rule 4455, 5.2.9 & 5.2.10] Federally Enforceable Through Title V Permit

32. The operator shall initially inspect a process PRD that releases to the atmosphere as soon as practicable but not later than 24 hours after the time of the release. To insure that the process PRD is operating properly, and is leak-free, the operator shall re-inspect the process PRD not earlier than 24 hours after the initial inspection but not later than 15 calendar days after the date of the release using EPA Method 21. If the process PRD is found to be leaking at either inspection, the PRD leak shall be treated as if the leak was found during quarterly operator inspections. [District Rule 4455, 5.2.11] Federally Enforceable Through Title V Permit

33. Except for process PRD, a component shall be inspected within 15 calendar days after repairing the leak or replacing the component using EPA Method 21. [District Rule 4455, 5.2.12] Federally Enforceable Through Title V Permit

34. A District inspection in no way fulfills any of the mandatory inspection requirements that are placed upon operators and cannot be used or counted as an inspection required of an operator. Any attempt by an operator to count such District inspections as part of the mandatory operator's inspections is considered to be willful circumvention and is a violation of this rule. [District Rule 4455, 5.2.13] Federally Enforceable Through Title V Permit

35. Upon detection of a leaking component, the operator shall affix to that component a weatherproof readily visible tag that contains the information specified in Section 5.3.3. The tag shall remain affixed to the component until the leaking component has been repaired or replaced; has been re-inspected; and is found to be in compliance with the requirements of this rule. [District Rule 4455, 5.3.1, 5.3.2 & 5.3.3] Federally Enforceable Through Title V Permit

36. An operator shall minimize all component leaks immediately to the extent possible, but not later than one (1) hour after detection of leaks in order to stop or reduce leakage to the atmosphere. [District Rule 4455, 5.3.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

37. If the leak has been minimized but the leak still exceeds the applicable leak standards of this rule, an operator shall repair or replace the leaking component, vent the leaking component to a closed vent system, or remove the leaking component from operation as soon as practicable but not later than the time period specified in Table 3. For each calendar quarter, the operator may be allowed to extend the repair period as specified in Table 3, for a total number of leaking components, not to exceed 0.05 percent of the number of components inspected, by type, rounded upward to the nearest integer where required. [District Rule 4455, 5.3.5] Federally Enforceable Through Title V Permit

38. If the leaking component is an essential component or a critical component and which cannot be immediately shut down for repairs, the operator shall minimize the leak within one hour after detection of the leak. If the leak has been minimized, but the leak still exceeds any of the applicable leak standards of this rule, the essential component or critical component shall be repaired or replaced to eliminate the leak during the next process unit turnaround, but in no case later than one year from the date of the original leak detection, whichever comes earlier. [District Rule 4455, 5.3.6] Federally Enforceable Through Title V Permit

39. For any component that has incurred five repair actions for major gas leaks or major liquid leaks, or any combination of major gas leaks and major liquid leaks within a continuous 12-month period, the operator shall comply with at least one of the requirements specified in Sections 5.3.7.1, 5.3.7.2, 5.3.7.3, or 5.3.7.4 by the applicable deadlines specified in Sections 5.3.7.5 and 5.3.7.6. If the original leaking component is replaced with a new like-in-kind component before incurring five repair actions for major leaks within 12-consecutive months, the repair count shall start over for the new component. An entire compressor or pump need not be replaced provided the compressor part(s) or pump part(s) that have incurred five repair actions as described in Section 5.3.7 are brought into compliance with at least one of the requirements of Sections 5.3.7.1 through 5.3.7.6. [District Rule 4455, 5.3.7] Federally Enforceable Through Title V Permit

40. The operator shall monitor process PRD by using electronic process control instrumentation that allows for real time continuous parameter monitoring or by using telltale indicators for the process PRD where parameter monitoring is not feasible. [District Rule 4455, 5.4.1] Federally Enforceable Through Title V Permit

41. After a release from a process PRD in excess of 500 pounds of VOC in a continuous 24-hour period, the operator shall immediately conduct a failure analysis and implement corrective actions as soon as practicable but not later than 30 days to prevent the reoccurrence of similar release. For refineries processing greater than 20,000 barrels of crude oil per day, any subsequent release in excess of 500 pounds of VOC within a continuous 24-hour period shall be subject to the requirements of Section 5.4.5. [District Rule 4455, 5.4.3 & 5.4.4] Federally Enforceable Through Title V Permit

42. The operator of a refinery processing greater than 20,000 barrels of crude oil per day shall connect all process PRDs serving that process equipment to an APCO-approved closed vent system as defined in Section 3.0 if any of the conditions specified in Sections 5.4.5.1 and 5.4.5.2 occurs. Process PRDs subject to the provisions of Section 5.4.5 shall be connected to an APCO-approved closed-vent system as soon as practicable, but no later than the first turnaround after the requirement to connect becomes effective. [District Rule 4455, 5.4.5] Federally Enforceable Through Title V Permit

43. All major components and critical components shall be physically identified clearly and visibly for inspection, repair, and recordkeeping purposes. The physical identification shall consist of labels, tags, manufacturer's nameplate identifier, serial number, or model number, or other system approved by the APCO that enables an operator or District personnel to locate each individual component. The operator shall replace tags or labels that become missing or unreadable as soon as practicable but not later than 24 hours after discovery. The operator shall comply with the requirements of Sections 6.1.4 if there is any change in the description of major components or critical components. [District Rule 4455, 5.5.1 & 5.5.2] Federally Enforceable Through Title V Permit

44. The operator shall keep a copy of the operator management plan at the facility and make it available to the APCO, ARB and US EPA upon request. By January 30 of each year, the operator shall submit to the APCO for approval, in writing, an annual report indicating any changes to the existing, approved operator management plan. [District Rule 4455, 6.1.2 & 6.1.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

45. The operator shall maintain an inspection log containing, at a minimum, 1) total number of components inspected, and total number and percentage of leaking components found by component types, 2) location, type, name or description of each leaking component, and description of any unit where the leaking component is found, 3) date of leak detection and method of leak detection, 4) for gaseous leaks, record the leak concentration in ppmv, and for liquid leaks record whether the leak is a major liquid leak or a minor liquid leak, 5) date of repair, replacement, or removal from operation of leaking components, 6) identification and location of essential component and critical components found leaking that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 7) methods used to minimize the leak from essential components and critical components that cannot be repaired until the next process unit turnaround or not later one year after leak detection, whichever comes earlier, 8) after the component is repaired or is replaced, the date of reinspection and the leak concentration in ppmv, 9) inspector's name, business mailing address, and business telephone number, and 10) the facility operator responsible for the inspection and repair program shall sign and date the inspection log certifying the accuracy of the information recorded in the log. [District Rule 4455, 6.2.1] Federally Enforceable Through Title V Permit

46. Records of each calibration of the portable hydrocarbon detection instrument utilized for inspecting components, including a copy of current calibration gas certification from the vendor of said calibration gas cylinder, the date of calibration, concentration of calibration gas, analyzer reading of calibration gas before adjustment, instrument reading of calibration gas after adjustment, calibration gas expiration date, and calibration gas cylinder pressure at the time of calibration. [District Rule 4455, 6.2.3] Federally Enforceable Through Title V Permit

47. The operator shall notify the APCO, by telephone or other methods approved by the APCO, of any process PRD release described in Sections 5.4.4 and 5.4.5, and any release in excess of the reportable quantity limits as stipulated in 40 CFR, Part 117, Part 302 and Part 355, including any release in excess of 100 pounds of VOC, within one hour of such occurrence or within one hour of the time said person knew or reasonably should have known of its occurrence. [District Rule 4455, 6.3.1] Federally Enforceable Through Title V Permit

48. The operator shall submit a written report to the APCO within thirty (30) calendar days following a PRD release subject to 6.3.1. The written report shall include 1) process PRD type, size, and location, 2) date, time and duration of the process PRD release, 3) types of VOC released and individual amounts, in pounds, including supporting calculations, 4) cause of the process PRD release, and 5) corrective actions taken to prevent a subsequent process PRD release. [District Rule 4455 6.3.2] Federally Enforceable Through Title V Permit

49. Copies of all records shall be retained for a minimum of five (5) years after the date of an entry. Such records shall be made available to the APCO, ARB, or US EPA upon request. [District Rule 4455, 6.2.2, 6.2.3 & 6.2.4] Federally Enforceable Through Title V Permit

50. Equivalent test methods other than specified in Sections 6.4.1 through 6.4.5 may be used provided such test methods have received prior approval from the US EPA, ARB, and APCO. [District Rule 4455, 6.4] Federally Enforceable Through Title V Permit

51. Measurements of gaseous leak concentrations shall be conducted according to US EPA Method 21 using an appropriate portable hydrocarbon detection instrument calibrated with methane. The instrument shall be calibrated in accordance with the procedures specified in US EPA Method 21 or the manufacturer's instruction, as appropriate, not more than 30 days prior to its use. The operator shall record the calibration date of the instrument. [District Rule 4455, 6.4.1] Federally Enforceable Through Title V Permit

52. The VOC content shall be determined using American Society of Testing and Materials (ASTM) D 1945 for gases and South Coast Air Quality Management District (SCAQMD) Method 304 for liquids. [District Rule 4455, 6.4.2] Federally Enforceable Through Title V Permit

53. The percent by volume liquid evaporated at 150 C shall be determined using ASTM D 86. [District Rule 4455, 6.4.3] Federally Enforceable Through Title V Permit

54. The control efficiency of any VOC control device, measured and calculated as carbon, shall be determined by US EPA Method 25, except when the outlet concentration must be below 50 ppm in order to meet the standard, in which case Method 25a may be used. US EPA Method 18 may be used in lieu of US EPA Method 25 or US EPA Method 25a provided the identity and approximate concentrations of the analytes/compounds in the sample gas stream are known before analysis with the gas chromatograph and the gas chromatograph is calibrated for each of those known analyte/compound to ensure that the VOC concentrations are neither under- or over-reported. [District Rule 4455, 6.4.4] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

55. Halogenated exempt compounds shall be analyzed by US EPA Method 18 or ARB Method 422 "Determination of Volatile Organic Compounds in Emission from Stationary Sources". [District Rule 4455, 6.4.5] Federally Enforceable Through Title V Permit

56. The operator shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: S-33-401-3 **EXPIRATION DATE:** 08/31/2022

EQUIPMENT DESCRIPTION:
RAILCAR LOADING/UNLOADING OPERATION WITH 8 TRANSFER STATIONS

PERMIT UNIT REQUIREMENTS

1. Operation shall include 8-spot railcar loading/unloading operation with disconnect, dry-break couplers, top loading drop tubes (equivalent to bottom loading) and three unloading pumps. Vapor lines shall vent to shared vapor control system. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Organic liquids with TVP greater than 0.5 psia unloaded from railcars shall be piped only to vapor controlled tanks. [District NSR Rule and Rule 4623] Federally Enforceable Through Title V Permit
3. Railcars loaded shall be connected to vapor recovery system except during the loading of crude oil with an API gravity less than 30 degrees, or crude oil, asphalt, or residual fuel oil stored in tanks which are exempt from permits pursuant to District Rule 2020. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emission rate from equipment associated with railcar loading/unloading operation shall not exceed 0.83 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Permittee shall maintain an accurate fugitive component count and resultant emissions calculated using < 10,000 ppmv emission factors from Table IV-2b (Marketing Terminal Screening Value Range Emission Factors) of the California Implementation Guidelines for Estimating Mass Emissions of Fugitive Hydrocarbon Leaks at Petroleum Facilities based on EPA's "Protocol for Equipment Leak Emission Estimates" (EPA-453/R-95-017), or other District approved emission factors. [District NSR Rule] Federally Enforceable Through Title V Permit
6. There shall be no more than 16 railcar loadings/unloadings per day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Permittee shall keep accurate records of railcar loading/unloading, liquid types, and liquid throughputs. [District Rule 1070] Federally Enforceable Through Title V Permit
8. All records required by this permit shall be maintained for a period of five years and shall be made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
9. The transfer rack vapor collection and control equipment shall be designed, installed, maintained and operated such that there are no leaks and no excess organic liquid drainage at disconnections. [District Rule 4624, 5.6] Federally Enforceable Through Title V Permit
10. For a Class 1 organic liquid transfer facility, the emission of VOC from the transfer operation shall not exceed 0.08 pounds per 1,000 gallons of organic liquid transferred. The VOC from the transfer operation shall be routed a storage tank that meets the control requirements specified in Rule 4623 (Amended 5/19/05). [District Rules 4624, 5.1] Federally Enforceable Through Title V Permit
11. The transfer rack vapor collection and control system shall operate such that the pressure in the delivery tank being loaded does not exceed 18 inches water column pressure and 6 inches water column vacuum. [District Rule 4624, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. The construction of any new top loading facility or the reconstruction, as defined in 40 CFR 60.15, or the expansion of any existing top loading facility with top loading equipment shall not be allowed. [District Rule 4624, 5.7] Federally Enforceable Through Title V Permit

13. In an organic liquid transfer facility, a leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or for organic liquids other than gasoline, the detection of any gaseous or vapor emissions with a concentration of VOC greater than 1,000 ppmv above background as methane, or for gasoline, a concentration of VOC greater than 10,000 ppmv as methane above background when measured using a portable hydrocarbon detection instrument in accordance with EPA Method 21. [District Rule 4624, 3.17] Federally Enforceable Through Title V Permit

14. Excess organic liquid drainage is defined as more than ten (10) milliliters liquid drainage. Such liquid drainage for disconnect operations shall be determined by computing the average drainage from three consecutive disconnects at any one permit unit. [District Rule 4624, 3.13] Federally Enforceable Through Title V Permit

15. The operator shall inspect the transfer rack vapor collection and control system and each transfer rack handling organic liquids for leaks during transfer at least once every calendar quarter using the EPA Method 21. [District Rule 4624, 5.9.1] Federally Enforceable Through Title V Permit

16. All leaking transfer equipment shall be repaired or replaced within 72 hours of discovery. If the leaking component cannot be repaired or replaced within 72 hours, the component shall be taken out of service until such time the component is repaired or replaced. The repaired or replacement equipment shall be reinspected the first time the equipment is in operation after the repair or replacement. [District Rule 4624, 5.9.3] Federally Enforceable Through Title V Permit

17. For an organic liquid transfer facility, an operator may apply for a written approval from the APCO to change the inspection frequency from quarterly to annually provided no leaks were found during five consecutive quarterly inspections. Upon identification of any leak during an annual inspection, the inspection frequency shall revert back to quarterly, and the operator shall contact the APCO in writing within 14 days. [District Rule 4624, 5.9.4] Federally Enforceable Through Title V Permit

18. Corrective steps shall be taken at any time the operator observes excess drainage at disconnect. In addition, the operator shall perform and record the results of annual drainage inspections at disconnect for each loading arm. If excess drainage on any loading rack is found, the drainage inspection frequency for that unit shall be changed from annual to quarterly. If no excess drainage is found during five quarterly inspections, inspection frequency for that unit shall be changed back from quarterly to annual. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

19. Compliance shall be demonstrated by collecting all drainage at disconnect in a spouted container. The drainage shall be transferred to a graduated cylinder and the volume determined within one (1) minute of collection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

20. The permittee shall keep records of daily liquid throughput and maintain an inspection log containing at least the following: A) dates of leak and drainage inspections, B) leak determination method, C) findings, D) corrective action (date each leak or excess drainage condition repaired), and E) inspector name and signature. [District Rule 2520, 9.3.2 and 4624, 6.1.3] Federally Enforceable Through Title V Permit

21. VOC emissions from the transfer rack vapor collection and control system shall be determined annually using 40 CFR 60.503. "Test Methods and Procedures" and EPA Methods 2A, 2B, 25A and 25B and ARB Method 422, or ARB Test Procedure TP-203.1. [District Rule 4624, 6.3.2] Federally Enforceable Through Title V Permit

22. The transfer rack vapor collection and control system (VCCS) shall be tested annually to demonstrate the pressure in the delivery tanks being loaded complies with the requirements specified in this permit. Compliance shall be determined by calibrating and installing a liquid manometer, magnehelic device, or other instrument demonstrated to be equivalent, capable of measuring up to 500 mm water gauge pressure with a precision of 2.5 mm water gauge, on the terminal's VCCS at a pressure tap as close as possible to the connection with the product tank truck. The highest instantaneous pressure measurement as well as all pressure measurements at 5 minute intervals during delivery vessel loading must be recorded. Every loading position must be tested at least once during the annual performance test. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

APPENDIX C
VOC Analysis of Acid Gas Removal System Stream

Acid Gas Vent Stream Analysis

Flow Rate to Flare and VOC Weight Fraction

8/5/2021 Update

Mass Flow	94	lb/hr
Molecular Weight	32.28	lb/lbmol
Molar flow	2.919	lbmol/hr
Volume Flow	18.46	scfm
Molar Volume	379	scf/lb-mol

			PPMV	lb/lb-mol	lb/hr	lb/day
H2O	0.256	lbmol/hr				
NH3	0.000	lbmol/hr	20	46	0.002689	0.064534
H2S	0.000	lbmol/hr	10	64	0.001871	0.044893
CO	0.000	lbmol/hr				
CO2	1.003	lbmol/hr				
H2	0.036	lbmol/hr				
C1	0.024	lbmol/hr				
C2	0.010	lbmol/hr				
C3	0.008	lbmol/hr				
C4	0.001	lbmol/hr				
C5	0.000	lbmol/hr				
N2	1.581	lbmol/hr				

VOC flow rate	0.411	lb/hr
Control Efficiency	99	%
Controlled VOC emissions	0.004	lb/hr
Controlled VOC emissions	0.099	lb/day

VOC weight fraction	0.004371138

Acid Gas Treatment VOC Content of Process Streams

8/5/2021 Update

	Sour Water	Sour Gas	Valkyrie Feed	Valkyrie Contactor to Flare	
Mass Flow	29925	81	99	94	lb/hr
Molecular Weight	18.03	27.83	33.02	32.28	lb/lbmol
Molar flow	1659.53	2.900	3.011	2.919	lbmol/hr
Volume Flow		18.34	19.05	18.46	scfm
Molar Volume		379	379	379	scf/lb-mol
H2O	1657.370	0.744	0.189	0.256	lbmol/hr
NH3	0.915	0.915	0.000	0.000	lbmol/hr
H2S	0.059	0.059	0.059	0.000	lbmol/hr
CO	0.000	0.000	0.000	0.000	lbmol/hr
CO2	1.102	1.102	1.102	1.003	lbmol/hr
H2	0.036	0.036	0.036	0.036	lbmol/hr
C1	0.024	0.024	0.024	0.024	lbmol/hr
C2	0.010	0.010	0.010	0.010	lbmol/hr
C3	0.008	0.008	0.008	0.008	lbmol/hr
C4	0.001	0.001	0.001	0.001	lbmol/hr
C5	0.000	0.000	0.000	0.000	lbmol/hr
N2	0.000	0.000	1.581	1.581	lbmol/hr
VOC flow rate	0.415	0.415	0.411	0.411	lb/hr
VOC weight percentage	0.001	0.515	0.413	0.437	% by weight

APPENDIX D
Fugitive Emission Calculations

Alon Bakersfield Refining
Project #S-1211850, Permit Unit #S-33-451

Fugitive Emissions Using Correlation Equation Emission Factors

California Implementation Guidelines for Estimating Mass Emissions
of Fugitive Hydrocarbon Leaks at Petroleum Facilities
Table IV-3a: CAPCOA -Revised 1995 EPA Protocol Refinery Correlation Equations for Refineries and Marketing Terminals
Fields shaded yellow are application specific values.

Equipment Type	Service	Component Count	% Default Zeros	%Pegged (>10,000)	% in Correlation Range	Correlation Screening Value (ppm)	Default Zero Emissions (lb/day)	Pegged Emissions (lb/day)	Correlation Emissions (lb/day)	VOC emissions (lb/day)
Valves	All	88	80.0%	0.0%	20.0%	200	0.029	0.000	0.111	0.140
Pump Seals	All	0	80.0%	0.0%	20.0%	500	0.000	0.000	0.000	0.000
Pressure Relief Devices *		6	80.0%	0.0%	20.0%	200	0.001	0.000	0.017	0.018
Others	All	24	80.0%	0.0%	20.0%	500	0.004	0.000	0.119	0.123
Connectors	All	672	80.0%	0.0%	20.0%	200	0.213	0.000	0.537	0.751
Flanges	All	66	80.0%	0.0%	20.0%	200	0.001	0.000	0.133	0.134
Open-ended lines	All	0	80.0%	0.0%	20.0%	500	0.000	0.000	0.000	0.000

Total VOC Emissions (lb/day) = 1.17
Total VOC Emissions (lb/yr) = 425.00

Factors Used in Calculations - For Reference

Equipment Type	Service	Default Zero Factor (kg/hr)	Pegged Factor (kg/hr)	Correlation Equation (kg/hr)
Valves	All	7.800E-06	6.400E-02	2.27E-06(SV)^0.747
Pump Seals	All	1.900E-05	8.900E-02	5.07E-05(SV)^0.622
Pressure Relief Device				
Others	All	4.000E-06	8.200E-02	8.69E-06(SV)^0.642
Connectors	All	7.500E-06	3.000E-02	1.53E-06(SV)^0.736
Flanges	All	3.100E-07	9.500E-02	4.53E-06(SV)^0.706
Open-ended lines	All	2.000E-06	3.300E-02	1.90E-06(SV)^0.724

* : Note: The application includes "pressure relief devices", which are classified as “others” components. Since the applicant proposes a different Correleation Screening Value for the "pressure relief devices" than "others" a separate category was entered for pressure relief devices. Note "others" type includes instruments, loading arms, pressure relief valves, vents, compressor seals, dump lever arms, diaphragms, drains, hatches, meters, and polished rods stuffing boxes. This “others” component type should be applied for any component type other than connectors, flanges, open-ended lines, pumps, or valves.

APPENDIX F
SSPE Calculations

Detailed SSPE Report

Region	Facility	Unit	Mod	NOx	SOx	PM10	CO	VOC	Number of Outstanding ATCs
S	33	0	3						0
S	33	2	8						0
S	33	3	8						0
S	33	4	10						0
S	33	5	8	0	0	0	0	256	0
S	33	6	8						0
S	33	7	8						0
S	33	8	27	40637	64807	18241	486246	13201	1
S	33	9	19	40997	32570	8655	132101	6263	0
S	33	10	9						0
S	33	11	14	8104	6424	1680	15070	1242	0
S	33	12	13	33680	26758	7110	62471	14452	0
S	33	13	26	58867	13053	4660	104770	2426	0
S	33	14	10	0	0	0	0	3601	0
S	33	15	9	0	0	0	0	0	0
S	33	16	9	0	0	0	0	0	0
S	33	17	13	24966	23032	8870	119100	4417	0
S	33	18	11	0	0	0	0	0	1
S	33	19	10	0	0	0	0	79680	0
S	33	20	23	0	0	0	0	1789	0
S	33	21	14						0
S	33	22	5						0
S	33	23	8						0
S	33	24	5						0
S	33	25	5						0
S	33	26	5						0

Notes:

Blank values for a particular permit unit do not necessarily relfect zero emissions. For units with blank values, the PE must still be determined based on physical PE or as limited by permit condition.

For permits that show outstanding ATCs, consult PAS ATC Emission Profile records to determine what the highest PE is for each pollutant.

ATCs for new units (e.g. S-XXXX-X-0) must be added in separately.

ERC's for onsite reductions must be added in separately per Rule 2201 as well.

Region	Facility	Unit	Mod	NOx	SOx	PM10	CO	VOC	Number of Outstanding ATCs
S	33	27	5						0
S	33	28	5						0
S	33	29	5						0
S	33	30	5						0
S	33	31	5						0
S	33	32	5						0
S	33	33	6						0
S	33	34	5						0
S	33	35	5						0
S	33	36	6						0
S	33	37	6						0
S	33	38	5						0
S	33	40	7					0	0
S	33	41	6						0
S	33	42	5						0
S	33	43	5						0
S	33	44	8	0	0	0	0	0	0
S	33	46	6						0
S	33	47	6						0
S	33	49	9	35131	329742	7417	292759	5367	0
S	33	50	5						0
S	33	52	19	62561	14843	4700	184185	15066	0
S	33	53	22	77713	53213	14140	550000	10234	1
S	33	54	7	0	18922	0	0	0	0
S	33	55	23	22451	34698	6123	148999	6123	1
S	33	56	31	84010	52086	24161	467944	60548	3
S	33	59	16	117	1926	9	312	27	0
S	33	61	16	117	1926	9	312	27	0
S	33	62	6	0	0	0	0	5	0

Notes:

Blank values for a particular permit unit do not necessarily relfect zero emissions. For units with blank values, the PE must still be determined based on physical PE or as limited by permit condition.

For permits that show outstanding ATCs, consult PAS ATC Emission Profile records to determine what the highest PE is for each pollutant.

ATCs for new units (e.g. S-XXXX-X-0) must be added in separately.

ERC's for onsite reductions must be added in separately per Rule 2201 as well.

Region	Facility	Unit	Mod	NOx	SOx	PM10	CO	VOC	Number of Outstanding ATCs
S	33	63	14	0	0	0	0	0	0
S	33	64	5	0	0	0	0	0	0
S	33	65	7	0	0	0	0	0	1
S	33	66	5						0
S	33	67	6						0
S	33	68	5						0
S	33	70	7						0
S	33	71	5						0
S	33	72	5						0
S	33	73	5						0
S	33	74	5						0
S	33	75	5						0
S	33	76	5						0
S	33	77	5						0
S	33	78	5						0
S	33	79	5						0
S	33	80	5						0
S	33	81	5						0
S	33	82	5						0
S	33	84	5						0
S	33	85	5						0
S	33	86	5						0
S	33	87	6						0
S	33	88	5						0
S	33	89	5						0
S	33	90	5						0
S	33	91	6						0
S	33	92	5						0
S	33	93	5						0

Notes:

Blank values for a particular permit unit do not necessarily relfect zero emissions. For units with blank values, the PE must still be determined based on physical PE or as limited by permit condition.

For permits that show outstanding ATCs, consult PAS ATC Emission Profile records to determine what the highest PE is for each pollutant.

ATCs for new units (e.g. S-XXXX-X-0) must be added in separately.

ERC's for onsite reductions must be added in separately per Rule 2201 as well.

Region	Facility	Unit	Mod	NOx	SOx	PM10	CO	VOC	Number of Outstanding ATCs
S	33	96	6						0
S	33	97	5						0
S	33	98	7						0
S	33	99	7						0
S	33	100	6						0
S	33	101	6						0
S	33	102	5						0
S	33	103	5						0
S	33	104	5						0
S	33	105	5						0
S	33	106	5						0
S	33	107	5						0
S	33	108	6						0
S	33	109	6						0
S	33	110	6						0
S	33	111	6						0
S	33	112	6						0
S	33	113	5						0
S	33	114	5						0
S	33	115	7						0
S	33	117	5						0
S	33	118	5						0
S	33	119	5						0
S	33	120	5						0
S	33	121	8	0	0	0	0	46793	0
S	33	122	5						0
S	33	124	11	0	0	0	0	137620	1
S	33	125	10	8888	9313	323	144294	30922	0
S	33	126	12	5780	6985	242	108220	23191	0

Notes:

Blank values for a particular permit unit do not necessarily relfect zero emissions. For units with blank values, the PE must still be determined based on physical PE or as limited by permit condition.

For permits that show outstanding ATCs, consult PAS ATC Emission Profile records to determine what the highest PE is for each pollutant.

ATCs for new units (e.g. S-XXXX-X-0) must be added in separately.

ERC's for onsite reductions must be added in separately per Rule 2201 as well.

Region	Facility	Unit	Mod	NOx	SOx	PM10	CO	VOC	Number of Outstanding ATCs
S	33	127	12	5780	6985	242	108220	23191	0
S	33	129	6						0
S	33	130	10	141	1	8	285	21	0
S	33	131	5						0
S	33	132	5						0
S	33	133	5						0
S	33	134	6						0
S	33	135	5						0
S	33	136	5						0
S	33	137	5						0
S	33	138	8						0
S	33	139	6						0
S	33	140	5						0
S	33	142	5						0
S	33	143	5						0
S	33	144	5						0
S	33	145	5						0
S	33	146	5						0
S	33	148	5						0
S	33	149	5						0
S	33	150	5						0
S	33	151	5						0
S	33	152	5						0
S	33	153	5						0
S	33	154	5						0
S	33	155	5	0	0	0	0	17246	0
S	33	163	4	0				0	0
S	33	165	5						0
S	33	166	6						0

Notes:

Blank values for a particular permit unit do not necessarily relfect zero emissions. For units with blank values, the PE must still be determined based on physical PE or as limited by permit condition.

For permits that show outstanding ATCs, consult PAS ATC Emission Profile records to determine what the highest PE is for each pollutant.

ATCs for new units (e.g. S-XXXX-X-0) must be added in separately.

ERC's for onsite reductions must be added in separately per Rule 2201 as well.

Region	Facility	Unit	Mod	NOx	SOx	PM10	CO	VOC	Number of Outstanding ATCs
S	33	167	6						0
S	33	338	9	3060	65584	8687	7702	0	0
S	33	348	16	19272	47304	5256	127896	2453	0
S	33	349	19	15768	11826	6132	32850	33925	1
S	33	351	4					2720	0
S	33	353	4						0
S	33	356	4						0
S	33	357	4						0
S	33	358	4						0
S	33	359	4	0				0	0
S	33	369	4						0
S	33	370	4						0
S	33	371	3						0
S	33	372	5	0	0	0	0	1752	0
S	33	373	4	0	0	0	0	1752	0
S	33	380	3						0
S	33	381	3						0
S	33	382	3						0
S	33	383	3						0
S	33	384	3	0	0	0	0	0	0
S	33	385	3	0	0	0	0	0	0
S	33	386	3	774	16	8	96	54	0
S	33	399	3	0	0	0	0	0	0
S	33	401	3	0	0	0	0	303	0
S	33	402	2	397	10	14	81	17	0
S	33	405	3	0	0	0	0	4709	0
S	33	438	1	0	0	0	0	1790	0
S	33	448	0	90	0	5	9	6	0
S	34	0	3						0

Notes:

Blank values for a particular permit unit do not necessarily relfect zero emissions. For units with blank values, the PE must still be determined based on physical PE or as limited by permit condition.

For permits that show outstanding ATCs, consult PAS ATC Emission Profile records to determine what the highest PE is for each pollutant.

ATCs for new units (e.g. S-XXXX-X-0) must be added in separately.

ERC's for onsite reductions must be added in separately per Rule 2201 as well.

Region	Facility	Unit	Mod	NOx	SOx	PM10	CO	VOC	Number of Outstanding ATCs
S	34	1	18	25229	58867	6391	70641	4625	0
S	34	2	16	12078	28887	2550	22546	1845	0
S	34	3	21	22075	42924	4660	51509	3373	0
S	34	4	5						0
S	34	5	6						0
S	34	6	10	0	228600	0	0	0	0
S	34	7	6						0
S	34	8	6						0
S	34	9	11	0	0	0	0	0	0
S	34	10	11	0	0	0	0	0	0
S	34	11	11	0	0	0	0	0	0
S	34	12	5	0	0	0	0	39	0
S	34	13	5						0
S	34	14	5						0
S	34	15	5						0
S	34	16	5						0
S	34	17	5						0
S	34	18	5						0
S	34	19	5						0
S	34	20	10	0	0	2592	0	0	0
S	34	21	5						0
S	34	22	5						0
S	34	23	4						0
S	34	24	4						0
S	34	25	6	0	0	0	0	949	0
S	34	26	6	0	0	0	0	0	0
S	34	27	5	0	0	0	0	1241	0
S	34	28	4						0
S	34	29	4						0

Notes:

Blank values for a particular permit unit do not necessarily relfect zero emissions. For units with blank values, the PE must still be determined based on physical PE or as limited by permit condition.

For permits that show outstanding ATCs, consult PAS ATC Emission Profile records to determine what the highest PE is for each pollutant.

ATCs for new units (e.g. S-XXXX-X-0) must be added in separately.

ERC's for onsite reductions must be added in separately per Rule 2201 as well.

Region	Facility	Unit	Mod	NOx	SOx	PM10	CO	VOC	Number of Outstanding ATCs
S	34	33	3						0
S	34	37	4						0
S	34	38	4						0
S	34	42	9	25754	24553	12019	126883	35198	0
S	34	45	4						0
S	34	49	2	397	10	14	81	17	0
S	34	51	3	90	0	5	9	6	0
S	3303	0	3						0
S	3303	1	7						1
S	3303	2	3						0
S	3303	3	5						0
S	3303	4	4	0	0	0	0	161	0
S	3303	5	2						0
S	3303	6	2						0
S	3303	7	2						0
S	3303	8	2						0
S	3303	9	2						0
S	3303	10	2						0
S	3303	11	2						0
	SSPE (lbs)			634924	1205865	154923	3365591	600643	

Notes:

Blank values for a particular permit unit do not necessarily relfect zero emissions. For units with blank values, the PE must still be determined based on physical PE or as limited by permit condition.

For permits that show outstanding ATCs, consult PAS ATC Emission Profile records to determine what the highest PE is for each pollutant.

ATCs for new units (e.g. S-XXXX-X-0) must be added in separately.

ERC's for onsite reductions must be added in separately per Rule 2201 as well.

APPENDIX G
BACT Guideline

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 7.1.10*

Last Update: 7/19/2018

Organic Liquid Loading Rack

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
VOC	Bottom fill loading (submerged pipe fill loading) with dry break couplers, or equivalent, and VOC emissions from the vapor collection and control system less than or equal to 0.015 pounds per 1,000 gallons of organic liquid		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a State Implementation Plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source**

APPENDIX H
BACT Analysis

Top-Down BACT Analysis for VOC Emissions

Organic Liquid Loading Rack (S-33-451-0)

BACT is triggered for organic liquid loading/unloading rack S-33-451-0. BACT Guideline 7.1.10 (Organic Liquid Loading Rack) applies to the equipment.

Step 1 - Identify All Possible Control Technologies

The SJVUAPCD BACT Guideline 7.1.10 identifies the following control:

- Bottom fill loading (submerged pipe fill loading) with dry break couplers, or equivalent, and VOC emissions from the vapor collection and control system less than or equal to 0.015 lb per 1,000 gallons of organic liquids (Achieved-in-Practice).

No other controls are listed in the guideline.

Step 2 - Eliminate Technologically Infeasible Options

There is no technologically infeasible option listed.

Step 3 - Rank Remaining Control Technologies by Control Effectiveness

1. Bottom fill loading (submerged pipe fill loading) with dry break couplers, or equivalent, and VOC emissions from the vapor collection and control system less than or equal to 0.015 lb per 1,000 gallons of organic liquids (Achieved-in-Practice).

Step 4 - Cost Effectiveness Analysis

Since the applicant proposes the only control technology identified in the guideline, a cost effectiveness analysis is not required.

Step 5 - Select BACT

BACT for the organic loading rack is determined to be the use of bottom fill loading (submerged pipe fill loading) with dry break couplers, or equivalent, and VOC emissions from the vapor collection and control system less than or equal to 0.015 lb-VOC per 1,000 gallons of organic liquids.

The applicant is proposing a loading/unloading rack that will be equipped with top loading drop tubes (which has been determined to be equivalent to bottom loading as explained in the Rule 4624 discussion), with VOC emissions from the collection and control system less than or equal to 0.015 lb-VOC per 1,000 gallons of organic liquids. Therefore, BACT requirements are satisfied.

APPENDIX I
HRA Summary

San Joaquin Valley Air Pollution Control District
Risk Management Review

To:	Robert Rinaldi – Permit Services
From:	Will Worthley – Technical Services
Date:	June 3, 2021
Facility Name:	ALON BAKERSFIELD REFINING
Location:	6451 ROSEDALE HWY (AREA 1 & 2), BAKERSFIELD
Application #(s):	S-33-451-0
Project #:	S-1211850

Summary

RMR

Units	Prioritization Score	Acute Hazard Index	Chronic Hazard Index	Maximum Individual Cancer Risk	T-BACT Required	Special Permit Requirements
451-0	0.02	0.00	0.00	3.09E-08	No	No
Project Totals	0.02	0.00	0.00	3.09E-08		
Facility Totals	>1	0.07	0.01	1.58E-05		

AAQA

An AAQA was not performed as VOCs do not have any state or federal AAQA standards.

Proposed Permit Requirements

To ensure that human health risks will not exceed District allowable levels; the following shall be included as requirements for:

Unit # 451-0

1. No special requirements.

Project Description

Technical Services received a request on June 2, 2021 to perform a Risk Management Review (RMR) for the following:

- Unit -56-34: MODIFICATION OF HYDROCRACKER UNIT #21 INCLUDING 9 HEATERS , CATALYTIC ASSEMBLY , AND MISC AIR COOLERS, EXCHANGERS , DRUMS, AND PUMPS - AREA 2: ADD VESSELS AND HIGH PRESSURE MEMBRANE SKID
- Unit -63-15: MODIFICATION OF SOUR WATER AND OILY WASTEWATER OPERATION INCLUDING HYDROCRACKER AND PHENOLIC SOUR WATER STRIPPING, PHOSAM UNIT, OIL WASTEWATER CLASSIFIER (83D-13), AND MISCELLANEOUS TANKS AND ASSOCIATED PIPING - AREA 2: ADD ACID TREATMENT SYSTEM

- Unit -124-14: MODIFICATION OF GAS PLANT #2 INCLUDING AMINE REGENERATION SYSTEM, VOC COALESCER, DRYER SYSTEM, DE-ETHANIZER, DE-PROPANIZER, PIPING TO SRU #1 (PTO #S-33-16) AND MISC. PUMPS, PIPING AND VESSELS: REPLACE TRAYS IN DEPROPANIZER COLUMN, DEBUTANIZER, AND DEETHANIZER AS REQUIRED, INSTALL VESSELS, EXCHANGERS, PUMPS, SEPARATORS, AND CAUSTIC TREATING PROCESS
- Unit -401-4: MODIFICATION OF RAILCAR LOADING/UNLOADING OPERATION WITH 8 TRANSFER STATIONS: REBUILD RAILCAR LOADING/UNLOADING OPERATION
- Unit -451-0: NEW ORGANIC LIQUID LOADING RACK

RMR Report

Analysis

The District performed an analysis pursuant to the District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, May 28, 2015) to determine the possible cancer and non-cancer health impact to the nearest resident or worksite. This policy requires that an assessment be performed on a unit by unit basis, project basis, and on a facility-wide basis. If a preliminary prioritization analysis demonstrates that:

- A unit's prioritization score is less than the District's significance threshold and;
- The project's prioritization score is less than the District's significance threshold and;
- The facility's total prioritization score is less than the District's significance threshold

Then, generally no further analysis is required.

The District's significant prioritization score threshold is defined as being equal to or greater than 1.0. If a preliminary analysis demonstrates that either the unit's or the project's or the facility's total prioritization score is greater than the District threshold, a screening or a refined assessment is required

If a refined assessment is greater than one in a million but less than 20 in one million for carcinogenic impacts (Cancer Risk) and less than 1.0 for the Acute and Chronic hazard indices(Non-Carcinogenic) on a unit by unit basis, project basis and on a facility-wide basis the proposed application is considered less than significant. For unit's that exceed a cancer risk of 1 in one million, Toxic Best Available Control Technology (TBACT) must be implemented.

Toxic emissions for this project were calculated using the following methods:

- The SDS sheets for the liquids used in the operation were reviewed by CAS# for Toxic Air Contaminants (TACs). The values were entered into SHARP.

These emissions were input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). In accordance with the District's Risk Management Policy, risks from the proposed unit's toxic emissions were prioritized using the procedure in the 2016 CAPCOA Facility Prioritization Guidelines. The prioritization score for this proposed facility was greater than 1.0 (see RMR Summary Table). Therefore, a refined health risk assessment was required.

The AERMOD model was used, with the parameters outlined below and meteorological data for 2013-2017 from Bakersfield (urban dispersion coefficient selected) to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid. These dispersion factors were input into the SHARP Program, which then used the Air Dispersion Modeling and Risk Tool (ADMRT) of the Hot Spots Analysis and Reporting Program Version 2 (HARP 2) to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Source Process Rates					
Unit ID	Process ID	Process Material	Process Units	Hourly Process Rate	Annual Process Rate
451	1	VOC	LBS	0.085	740

Area Source Parameters					
Unit ID	Unit Description	Release Height (m)	X-Length (m)	Y -Length (m)	Area (m^2)
451	Loading Rack	0.00	10.00	10.00	100.00

Conclusion

RMR

The cumulative acute and chronic indices for this facility, including this project, are below 1.0; and the cumulative cancer risk for this facility, including this project, is less than 20 in a million. In addition, the cancer risk for each unit in this project is less than 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

To ensure that human health risks will not exceed District allowable levels; the permit requirements listed on page 1 of this report must be included for this proposed unit.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

Attachments

A. Modeling request from the project engineer

B. Additional information from the applicant/project engineer

C. Prioritization score w/ toxic emissions summary

D. Facility Summary

APPENDIX J
Quarterly Net Emissions Change (QNEC)

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - PE1, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
PE2 = Post-Project Potential to Emit for each emissions unit, lb/qtr.
PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.1 in the evaluation above, quarterly PE2 and quarterly PE1 can be calculated as follows:

$PE2_{quarterly}$ = $PE2_{annual}$ ÷ 4 quarters/year

$PE1_{quarterly}$= $PE1_{annual}$ ÷ 4 quarters/year

Quarterly NEC [QNEC] – S-33-56-34			
Pollutant	**PE2 (lb/qtr)**	**PE1 (lb/qtr)**	**QNEC (lb/qtr)**
NO_X	84,261/4	84,261/4	0
SO_X	52,096/4	52,096/4	0
PM_{10}	24,190/4	24,190/4	0
CO	467,947/4	467,947/4	0
VOC	26,790/4	26,790/4	0

Quarterly NEC [QNEC] – S-33-63-15			
Pollutant	**PE2 (lb/qtr)**	**PE1 (lb/qtr)**	**QNEC (lb/qtr)**
NO_X	0	0	0
SO_X	0	0	0
PM_{10}	0	0	0
CO	0	0	0
VOC	0	0	0

Quarterly NEC [QNEC] – S-33-124-14			
Pollutant	**PE2 (lb/qtr)**	**PE1 (lb/qtr)**	**QNEC (lb/qtr)**
NO_X	0	0	0
SO_X	0	0	0
PM_{10}	0	0	0
CO	0	0	0
VOC	8,682/4	8,682/4	0

Quarterly NEC [QNEC] – S-33-401-4			
Pollutant	**PE2 (lb/qtr)**	**PE1 (lb/qtr)**	**QNEC (lb/qtr)**
NO_X	0	0	0
SO_X	0	0	0
PM_{10}	0	0	0
CO	0	0	0
VOC	303/4	303/4	0

Quarterly NEC [QNEC] – S-33-451-0			
Pollutant	**PE2 (lb/qtr)**	**PE1 (lb/qtr)**	**QNEC (lb/qtr)**
NO_X	0	0	0
SO_X	0	0	0
PM_{10}	0	0	0
CO	0	0	0
VOC	746/4 = 186.5	0	186.5

APPENDIX K
ERC Withdrawal Calculations

VOC		1st Quarter (lb)	2nd Quarter (lb)	3rd Quarter (lb)	4th Quarter (lb)	Annual lb
Surplus VOC offsets required (includes offset ratio)		279	280	280	280	1,119
	% discount					
ERC S-5178-1 face value		29,099	29,898	30,307	30,215	119,519
ERC S-5178-1 surplus value	46.5%	15,568	15,995	16,217	16,165	63,945
ERC S-5178-1 value to be provided/withdrawn [offsets required ÷ (1 – xx.x)]		522	523	523	523	2,091
Amount Remaining		28,577	29,375	29,784	29,692	117,428
Credits reissued under ERC S-XXXX-1		28,577	29,375	29,784	29,692	117,428

APPENDIX L
Surplus ERC Analysis

San Joaquin Valley Air Pollution Control District

Surplus ERC Analysis

Facility Name:	Alon Bakersfield Refining	**Date:**	August 4, 2021
Mailing Address:	6451 Rosedale Hwy, Bakersfield, CA 93308	**Engineer:**	Homero Ramirez
		Lead Engineer:	
Contact Person:	Matthew Jalali		
Telephone:	(661) 742-7243		
ERC Certificate #:	S-5178-1		
Project #:	S-1211850		

I. Proposal

Alon Bakersfield Refining is proposing the use of the following Emission Reduction Credit (ERC) certificate to meet the federal offset requirements of District Project S-1211850:

Proposed ERC Certificate	
Certificate #	**Criteria Pollutant**
S-5178-1	VOC

The purpose of this analysis is to establish the current surplus value of the ERC certificate. The current face value and surplus value of the ERC certificate are summarized in the following table:

Criteria Pollutant: VOC

Certificate S-5178-1				
Pollutant	1st Qtr. (lb/qtr)	2nd Qtr. (lb/qtr)	3rd Qtr. (lb/qtr)	4th Qtr. (lb/qtr)
Current Value	29,099	29,898	30,307	30,215
Surplus Value	15,568	15,995	16,217	16,165

II. Individual ERC Certificate Analysis

ERC Certificate S-5178-1

A. ERC Background

Criteria Pollutant: VOC

ERC Certificate S-5178-1 is a certificate that was split out from original ERC Certificate S-20071301-1. Original ERC Certificate S-20071301-1 was issued to Texaco Refining and Marketing, Inc. (now Alon Bakersfield Refining, S-33) on January 14, 1988 under project S-870731. The ERCs were generated from the shutdown of refinery equipment, including a thermofor catalytic cracking (TCC) unit, heaters, internal combustion engines, a CO boiler, and fugitives components. The following table summarizes the values of the original certificate and the current value of the subject certificate proposed to be utilized as a part of the current District project:

Certificates S- 20071301-1 and S-5178-1				
Pollutant	1st Qtr. (lb/qtr)	2nd Qtr. (lb/qtr)	3rd Qtr. (lb/qtr)	4th Qtr. (lb/qtr)
Original Value of Parent Certificate S- 20071301-1	130,642	130,642	130,642	130,642
Current Value of ERC Certificate S-5178-1	29,099	29,898	30,307	30,215

B. Applicable Rules and Regulations at Time of Original Banking Project

Based on the application review for the original ERC banking project, the following rules and regulations were evaluated to determine the surplus value of actual emission reductions of VOC generated by the reduction project.

1. District Rules

Kern County Rule 210.1 Standards for Authority to Construct

The application review for the original ERC banking project demonstrated that the equipment was in compliance with the applicable permit requirements.

Kern County Rule 210.3 Emission Reduction Credit Banking

The application review for the original ERC banking project demonstrated that the ERC complied with banking rule requirements at the time it was issued.

2. Federal Rules and Regulations

The application review for the original ERC banking project demonstrated that the equipment was in compliance with RACT requirements. There were no other applicable federal rules or regulations identified that applied at the time of this original ERC banking action; therefore, no further discussion is required.

C. New or Modified Rules and Regulations Applicable to the Original Banking Project

The current versions of any applicable District and federal rules and regulations that have been adopted or amended since the original banking project was finalized will be evaluated below:

1. District Rules:

Rule 2301 - Emission Reduction Credit Banking (8/15/19)

District Rule 2301 has been amended since the original ERC certificate was issued. The requirements of this rule only apply at the time of the original banking action; therefore, no further evaluation of this rule will be performed in this analysis.

Rule 4305 - Boilers, Steam Generators, and Process Heaters – Phase 2 (8/21/03)

Rule 4306 - Boilers, Steam Generators, and Process Heaters – Phase 3 (12/17/20)

The requirements of Rules 4305 and 4306 would have been applicable to the heaters and boiler that were shut down in the original ERC banking project. However, these rules do not have any requirements for VOC emissions, or any requirements that could affect VOC emissions. The VOC emission reductions under evaluation therefore remain surplus of the requirements of these rules.

Rule 4320 - Advanced Emission Reduction Options for Boilers, Steam Generators, and Process Heaters Greater than 5.0 MMBtu/hr (12/17/20)

The requirements of Rule 4320 would have been applicable to the liquid fuel fired heaters and boiler that were shut down in the original ERC banking project. Rule 4320 effectively prohibits liquid fuel firing. Adjustments to the original value of the emission reductions from these units due to the requirements of this rule will be calculated in Section D of this analysis.

Rule 4455 - Components at Petroleum Refineries, Gas Liquids Processing Facilities, and Chemical Plants (4/20/05)

The requirements of Rule 4455 would have been applicable to the fugitives components that were shut down in the original ERC banking project. The rule specifies leak standards for various categories of components, leak detection and minimization/repair requirements, as well as inspection and maintenance, and recordkeeping requirements.

The fugitives components were previously subject to Kern County Rule 414.1 (adopted on 1/9/1979, last amended on 3/7/1996). The requirements of Rule 4455 are similar, but generally more stringent than those of Rule 414.1. For instance, Rule 4455 includes a minor gas leaks category with leak standards as low as 100 ppmv, compared to the leak/major leak standard of 10,000 ppmv in both rules; allows a leak rate of ≤ 0.5% of components inspected, compared to 2% in Rule 414.1; and allows a repair period of 2 – 7 days, compared to 15 days in Rule 414.1.

The staff report for Rule 4455 (page B-3) estimated that the rule would result in a 89% VOC emission reduction. Adjustments to the original value of the emission reductions from these units due to the requirements of this rule will be calculated in Section D of this analysis.

Rule 4701 - Internal Combustion Engines - Phase 1 (8/21/03)

District Rule 4701 was last amended on 8/21/2003 and approved into the District's SIP on 5/18/2004. This rule would have been applicable to the engines that were shut down in the original banking project. However, since the requirements of this rule have been superseded by the more stringent requirements of Rule 4702, adjustments to the original value of the emission reductions due to the requirements of this rule are not necessary.

Rule 4702 - Internal Combustion Engines (11/14/13)

District Rule 4702 was last amended on 11/14/2013 and approved into the District's SIP on 4/25/2016. This rule would have been applicable to the engines that were shut down in the original banking project. Adjustments to the original value of the emission reductions from these units due to the requirements of this rule will be calculated in Section D of this analysis.

2. Federal Rules and Regulations:

40 CFR Part 60 Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

Pursuant to §60.40b(a), the affected facility to which this subpart applies is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984. Since the boiler involved in the original ERC banking was not constructed, modified, or reconstructed after June 19, 1984, it would not have been subject to the requirements of this subpart. The VOC emission reductions under evaluation therefore remain surplus of the requirements of this subpart.

40 CFR Part 60 Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

Pursuant to §60.40c(a), the affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989. Since the process heaters involved in the original ERC banking were not constructed, modified, or reconstructed after June 9, 1989, they would not have been subject to the requirements of this subpart. The VOC emission reductions under evaluation therefore remain surplus of the requirements of this subpart.

40 CFR Part 60 Subpart J - Standards of Performance for Petroleum Refineries

This subpart does not have any requirements for VOC emissions or any requirements that could affect VOC emissions. The VOC emission reductions under evaluation therefore remain surplus of the requirements of this subpart.

40 CFR Part 60 Subpart Ja - Standards of Performance for Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After May 14, 2007

The requirements of this subpart are applicable to emission units for which construction, reconstruction, or modification commenced after May 14, 2007. Since the refinery process units involved in the original ERC banking were not constructed, modified, or reconstructed after May 14, 2007, they would not have been subject to the requirements of this subpart. The VOC emission reductions under evaluation therefore remain surplus of the requirements of this subpart.

40 CFR Part 60 Subpart GGG - Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for which Construction, Reconstruction, or Modification Commenced after January 4, 1983, and on or Before November 7, 2006

40 CFR Part 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

The requirements of Subpart GGG are applicable to emission units for which construction, reconstruction, or modification commenced after January 4, 1983. The requirements of Subpart GGGa are applicable to emission units for which construction, reconstruction, or modification commenced after November 7, 2006.

According to the original ERC banking evaluation, the emission units involved were last operated in November 1983, and the data used to calculate the reductions were from operations in 1982 and 1983. The subject emission units must therefore have been in operation prior to January 4, 1983. Based on a review of the available records, there are no permit applications or other documents indicating that any modifications were done in 1983. The emission units that were shut down would therefore not have been subject to the requirements of these subparts.

Since the emission units that were shut down would not have been subject to the requirements of these subparts, the VOC emission reductions under evaluation remain surplus of the requirements of these subparts.

40 CFR Part 60 Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

The requirements of this subpart are applicable to engines that were modified or reconstructed after June 12, 2006. Since the engines involved in the original ERC banking were not constructed, modified, or reconstructed after June 12, 2006, they would not have been subject to the requirements of this subpart. The VOC emission reductions under evaluation therefore remain surplus of the requirements of this subpart.

40 CFR Part 63 Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries

The requirements of this subpart are applicable to certain specified petroleum refining process units and to related emissions points that are located at a plant site that is a major source of HAP emissions. A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year. Based on data from the engineering evaluation for Project S-851028 (banking of ERC resulting from the installation of a CO boiler to control fluid coker exhaust emissions, 1976/77),[9] the post-project emission rate for benzene was 491 tons/year.[10] This facility would therefore have been a major HAP source, and would have been subject to the requirements of this subpart.

Pursuant to §63.640, the requirements of this subpart are applicable to the following emission points from petroleum refining process units: miscellaneous process vents, storage vessels, wastewater streams and treatment operations, equipment leaks, gasoline loading racks, marine vessel loading operations, heat exchange systems, and releases associated with the decoking operations of a delayed coking unit. Pursuant to §63.640(d)(4), the requirements of this subpart are not applicable to emissions from catalytic cracking units. Thus, of the equipment that was shut down, only the fugitives components (i.e. equipment leaks) would have been subject to the requirements of this subpart.

Pursuant §63.648(a), existing sources[11] shall meet the equipment leak standards of this subpart by implement the standards in 40 CFR 60 Subpart VV. 40 CFR 60 Subpart VV specifies leak detection and repair (LDAR) requirements for various categories of

[9] Note that the fluid coker and CO boiler in question are the same units that were subsequently shut down in Project S-870731.
[10] The pollutant of concern is identified as 'benzene' in the pre-project discussion and as 'hydrocarbons' in the post-project discussion, and is assumed in the current evaluation to be the same pollutant. Also note that the pre-project emission rate for benzene was 2,693 tons/year. Assuming the CO boiler was capable of a control efficiency of 99%, which is unlikely, then the post-project emission rate would be 27 tons/year, which is still clearly above the major source threshold.
[11] Sources for which construction, reconstruction, or modification commenced on or before July 14, 1994.

components, including valves in gas/vapor service and in light liquid service (§60.482-7) and valves in heavy liquid service and connectors (§60.482-8). The specified requirements, including a leak detection threshold of 10,000 ppm and a 15-day repair period, are generally similar to those in Kern County Rule 414.1.

Since the components that were shut down were already subject to similar LDAR requirements under Kern County Rule 414.1, the VOC emission reductions under evaluation remain surplus of the requirements of this subpart.

40 CFR Part 63 Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units

The requirements of this subpart are applicable to petroleum refineries that are located at a major source of HAP emissions. The subpart applies to each new, reconstructed, or existing affected source at a petroleum refinery. However, pursuant to §63.1562(f), the subpart does not apply to a thermal catalytic cracking unit. Thus, the subpart would not have been applicable to any of the emission units that were shut down. The VOC emission reductions under evaluation therefore remain surplus of the requirements of this subpart.

40 CFR Part 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The requirements of this subpart are applicable to new and existing engines at major and area sources of HAP emissions. Existing engines are those that commenced construction or reconstruction before June 12, 2006. Since the engines involved in the original ERC banking were shut down prior to June 12, 2006, they would have been existing engines.

Pursuant to §63.6602, existing stationary RICE with a site rating of equal to or less than 500 brake HP located at a major source of HAP emissions, must comply with the emission limitations and other requirements in Table 2c to this subpart. The following excerpt from Table 2c shows the applicable requirements for the subject engines:[12]

For each . . .	You must meet the following requirement, except during periods of startup . . .	During periods of startup you must . . .
11. Non-emergency, non-black start 4SRB stationary RICE 100≤HP≤500	Limit concentration of formaldehyde in the stationary RICE exhaust to 10.3 ppmvd or less at 15 percent O_2.	

[12] Based on the information from the original ERC banking evaluation, all the engines were rated 300 and 330 bhp. Absent any information to indicate otherwise, the engines are assumed to be 4-stroke rich burn (4SRB) units, as this is the most likely standard configuration for the type of engines concerned.

The emission rates used in the banking project are from AP-42, Table 5.1-1, where the aldeyhydes emission rate is indicated as 0.1 lb/MMBtu. However, Table 3.2-3[13] indicates a formaldehyde emission rate of 0.0205 lb/MMBtu, which is equivalent to approximately 8.5 ppmv at 15% O_2 . Thus, since the formaldehyde emission rate that would have been applicable when the emission reductions were banked is lower than the one specified in the subpart, there would have been no effect from implementation of the requirement in the subpart. The VOC emission reductions under evaluation therefore remain surplus of the requirements of this subpart.

40 CFR Part 63 Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

This subpart is applicable to industrial, commercial, or institutional boilers or process heaters that are located at, or are part of, a major source of HAP emissions.

Pursuant to §63.7500(e), units designed to burn refinery gas are not subject to any emission limits in this subpart.

Pursuant to the requirements in Table 2 of the subpart, units that are designed to burn liquid fuel are subject emission limits for HCl, mercury, PM, and CO. There are no requirements for VOC emissions. As such, this regulation will not be considered further.

D. Surplus at Time of Use Adjustments to ERC Quantities

As demonstrated in the section above, rules and regulations that would have been applicable to permit units in the original banking project have been adopted or amended since the date on which the original banking project was finalized. The emissions limits from these new/modified rules and regulations will be compared to the pre-project and post-project emission limits of each permit unit included in the original banking project to determine any discounting of the original surplus value of emission reductions due to the new/modified rules or regulations.

The quantity of ERCs issued from each permit unit in the original banking project, the percentage of that amount which was discounted due to a new/modified rule or regulation, and the current surplus value of the quantity of ERCs from each permit unit are calculated in the tables below:

[13] Uncontrolled Emission Factors for 4-Stroke Rich-Burn Engines

Surplus Value Calculations for Gas-Fired IC Engines		
Emission Reductions Contributing to ERC (A)	303,348[14]	lb/year
Pre-Project (EF1)	1,400	lb/MMscf
Post-Project (EF2)	0	lb/MMscf
Most Stringent Applicable Rule (EF_{Rule}):[15] Rule 4702, 5.2.2, Table 2, Category 1.d.	320.3	lb/MMscf
Percent Discount* (B)	77.1%	--
Surplus Reductions Contributing to ERC (A) x [1- (B)]	69,467	lb/year

*If EF_{Rule} < EF2, Percent Discount = 100%, or
If EF_{Rule} > EF1, Percent Discount = 0%, otherwise,
(EF1 – EF_{Rule}) x 100 ÷ (EF1 – EF2)

Surplus Value Calculations for TCC Kilns		
Emission Reductions Contributing to ERC (A)	205,959	lb/year
Pre-Project (EF1)	87	lb/1,000 bbl feed
Post-Project (EF2)	0	lb/1,000 bbl feed
Most Stringent Applicable Rule (EF_{Rule}): RACT (AP-42, Table 5.1-1, 4/15)	87	lb/1,000 bbl feed
Percent Discount* (B)	0%	--
Surplus Reductions Contributing to ERC (A) x [1- (B)]	205,959	lb/year

*If EF_{Rule} < EF2, Percent Discount = 100%, or
If EF_{Rule} > EF1, Percent Discount = 0%, otherwise,
(EF1 – EF_{Rule}) x 100 ÷ (EF1 – EF2)

[14] (480.52 + 350.57) lb/day x 365 days/yr.
[15] As previously discussed, the engines are assumed to be rich burn units. The applicable limit in District Rule 4702 is Section 5.2.2, Table 2, Category 1.d., i.e. 250 ppmv @ 15% O_2. This was converted to 0.3203 lb/MMBtu, which is equivalent to 320.3 lb/MMscf.

Surplus Value Calculations for Process Heaters - Gas-Firing		
Emission Reductions Contributing to ERC (A)	971	lb/year
Pre-Project (EF1)	2.8	lb/MMscf
Post-Project (EF2)	0	lb/MMscf
Most Stringent Applicable Rule (EF_{Rule}): RACT (AP-42, Table 1.4-2, 7/98)	5.5	lb/MMscf
Percent Discount* (B)	0%	--
Surplus Reductions Contributing to ERC (A) x [1- (B)]	971	lb/year

*If EF_{Rule} < EF2, Percent Discount = 100%, or
If EF_{Rule} > EF1, Percent Discount = 0%, otherwise,
(EF1 – EF_{Rule}) x 100 ÷ (EF1 – EF2)

Surplus Value Calculations for Process Heaters – Oil Firing		
Emission Reductions Contributing to ERC (A)	95	lb/year
Pre-Project (EF1)	0.28	lb/1,000 gal
Post-Project (EF2)	0	lb/1,000 gal
Most Stringent Applicable Rule (EF_{Rule}):[16] Rule 4320, 5.4.2	0	lb/1,000 gal
Percent Discount* (B)	100%	--
Surplus Reductions Contributing to ERC (A) x [1- (B)]	0	lb/year

*If EF_{Rule} < EF2, Percent Discount = 100%, or
If EF_{Rule} > EF1, Percent Discount = 0%, otherwise,
(EF1 – EF_{Rule}) x 100 ÷ (EF1 – EF2)

[16] Rule 4320 prohibits the use of liquid fuel, except on a limited basis during utility natural gas curtailment. Since the units at this facility were not fired on utility natural gas, the curtailment exemption would not have been applicable.

Surplus Value Calculations for Gas-Fired CO Boiler		
Emission Reductions Contributing to ERC (A)	2,168	lb/year
Pre-Project (EF1)	2.8	lb/MMscf
Post-Project (EF2)	0	lb/MMscf
Most Stringent Applicable Rule (EF_{Rule}): RACT (AP-42, Table 1.4-2, 7/98)	5.5	lb/MMscf
Percent Discount* (B)	0%	--
Surplus Reductions Contributing to ERC (A) x [1- (B)]	2,168	lb/year

*If EF_{Rule} < EF2, Percent Discount = 100%, or
If EF_{Rule} > EF1, Percent Discount = 0%, otherwise,
(EF1 – EF_{Rule}) x 100 ÷ (EF1 – EF2)

Surplus Value Calculations for Fugitives Components		
Emission Reductions Contributing to ERC (A)	10,027	lb/year
Pre-Project (EF1)	100%	Baseline emissions before Rule 4455 implementation
Post-Project (EF2)	0	
Most Stringent Applicable Rule (EF_{Rule}): Rule 4455 (89% emission reduction)	11%	% of emissions after Rule 4455 implementation (per Rule 4455 staff report)
Percent Discount* (B)	89%	Emission reduction per Rule 4455 staff report
Surplus Reductions Contributing to ERC (A) x [1- (B)]	1,103	lb/year

*If EF_{Rule} < EF2, Percent Discount = 100%, or
If EF_{Rule} > EF1, Percent Discount = 0%, otherwise,
(EF1 – EF_{Rule}) x 100 ÷ (EF1 – EF2)

Total Discount Percentage for ERC Certificate

The total percentage by which ERC S-20071301-1 is discounted due to new and modified rules and regulations is summarized in the following table:

Total Percent Discount Summary for ERC Certificate S-20071301-1			
Permit(s)	Quantity of ERCs Issued (lb/year)	Percent Discount	Surplus Value (lb/year)
IC Engines	303,348	77.1%	69,467
TCC Kiln	205,959	0%	205,959
Process Heaters - Gas-Firing	971	0%	971
Process Heaters - Oil-Firing	95	100%	0
CO Boiler	2,168	0%	2,168
Fugitives Sources	10,027	89%	1,103
Total	**522,568**	**--**	**279,668**
Total Percent Discount*		**46.5%**	

* Total Percent Discount = [(Total Amount of ERCs Issued – Total Surplus Value) ÷ Total Amount of ERCs Issued] x 100

E. Surplus Value of ERC Certificate

As shown in the previous section, the surplus at time of use value of this ERC certificate will be adjusted. The current face value of the ERC certificate, the percentage by which the current value is discounted based on the surplus analysis in the previous section, and the current calculated surplus value of the ERC certificate are shown in the table below:

ERC Certificate S-5178-1 – Criteria Pollutant VOC					
		1st Qtr. (lb/qtr)	2nd Qtr. (lb/qtr)	3rd Qtr. (lb/qtr)	4th Qtr. (lb/qtr)
(A)	Current ERC Quantity	29,099	29,898	30,307	30,215
(B)	Percent Discount	**46.5%**	**46.5%**	**46.5%**	**46.5%**
(C) = (A) x [1 – (B)]	**Surplus Value**	15,568	15,995	16,217	16,165