

Specific Comments on Title V Revision 1 Permit Language Tesoro Golden Eagle Refinery (Plant # B2758 & #B2759)

Item No.	Section	Source # or Condition #	Comment and Modification Requested
1.	Table II A	S973 S974	The descriptions for these two sources need to be reversed - S973 should be F56, and S974 should be F55. This would accurately reflect the information contained in our Permit to Operate (PTO), as shown in the attached page 27 from the PTO. This change also needs to be made for the references to these sources in Table IV-AF and Table VII-AF.
2.	Table II B	A904 A927 A950 A971 A1431 A1432 A1433	For all of these abatement devices, the listed "Applicable Requirement" cites Regulation 9-10-301, with its associated "Limit or Efficiency" noted as a NOx requirement of 0.033 lb NOx/MMBtu. This specific citation is for the refinery-wide NOx requirement, and as such, is not explicitly the limit for each of these specific abatement devices. Since these abatement devices are associated with furnaces already under this requirement citation in their respective Table IV, this reference to Regulation 9-10-301 is unnecessary and duplicative.
3.	Table II B	A8 A9 A11 A30 A806	All of these abatement devices are electrostatic precipitators with visible emissions/particulate limitations regulated under Regulation 6. The Table II B column defining "Operating Parameters" which would specify control-operating conditions to achieve these limits has a future effective date of June 1, 2004. Since the future effective date will occur prior to the issuance of the Revision 1 permit, we request that this future effective date be extended to allow the facility to achieve compliance with the citation.
4.	Section VI	#18372	There are typographical errors under 29.) A. and B. (missing part of firing rate unit of measurement, MMBtu/H). For clarity, we also request the changes to the language proposed by WSPA in their letter to Mr. Steve Hill, submitted April 14, 2004, <u>NOx Alternative Compliance Provisions for Small Heaters and Boilers</u> .

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5.	Section VI	#19528	Item 11A) refers to a flow measurement /recordkeeping requirement for the refinery flare system. We believe this referenced parametric monitoring citation would have the same applicable requirements as other parametric monitors for other refinery sources, and, as such would allow periods of inoperability under Regulation 1-522. For item 11C) b. ii. We request that the distance range be changed from "15 ft to 0.25 miles" to "15 ft to 0.5 miles", to allow the area operators to be closer to their operating areas to manage the upset process condition, rather than getting closer to the flares to make the visible inspection.
6.	Table VII-Ja	S660 S808	These sources were removed from the requirements in permit condition #19528, Part 14, but still remain included in the Table VII reference. These two sources should be removed from Table VII-Ja.