Bay Area Air Quality Management District

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San Francisco, CA 94109
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Proposed
Permit Evaluation
and
Statement of Basis
for
MAJOR FACILITY REVIEW PERMIT
Reopening – Revision 1.5

for

Tesoro Refining and Marketing Company
Facility B2758 & B2759

Facility Addresses:

Avon Refinery
150 Solano Way
Martinez, CA 94553

Amorco Terminal
1750 Marina Vista Way
Martinez, CA 94553

Mailing Address:

Avon Refinery 150 Solano Way
Martinez, CA 94553

January 2005

Application 11696

Reopening of Title V permit for Tesoro

Statement of Basis

On October 8, 2004, EPA Region IX determined that cause exists to reopen the Title V permit for Tesoro. The two issues identified by EPA are compliance monitoring for enclosed combustion devices, and federal enforceability of certain ConocoPhillips permit conditions originally established in NSR permits. The purpose of this reopening is to address these issues. The District responded to EPA regarding these two issues in a January 6, 2005, letter, the contents of which is referred to herein and which also forms a part of the basis for this reopening.

Compliance Monitoring for Enclosed Combustion Devices

EPA's October 8, 2004 finding of cause to reopen states that the Bay Area Title V permits lack periodic monitoring for the following requirements: 40 CFR 60.482-10(c), 60.692-5(a), and 61.242-11(c). These standards require that enclosed combustion devices be designed and operated to reduce VOC emissions by 95% or to provide a minimum residence time at a specified temperature.

40 CFR 60.482-10(c) requires the operator to choose one of two compliance options: 95% control or 20 ppm exit concentration (whichever is less stringent), or a minimum residence time and temperature.

40 CFR 60.692-5(a) requires the operator to choose one of two compliance options: 95% control or a minimum residence time and temperature.

40 CFR 61.242-11(c) requires the operator to choose one of two compliance options: 95% control or 20 ppm exit concentration (whichever is less stringent), or a minimum residence time and temperature.

EPA's October 8, 2004, letter directs this finding of cause to reopen towards all refineries" in the Bay Area. The District has reviewed applicability of these requirements, and believes that EPA's finding of cause to reopen is relevant to the following sources at the Bay Area refineries:

Source	Applicable Req.	Monitoring contained in Current Perit	
		Temp	Res. Time
Chevron			
Fugitive Sources (abated by ES-300's or ES-60)	60.482-10(c)	Table VII.H.2.1	None

Fugitive Sources (abated by ES-300's or ES-60)	60.692-5(a)	Table VII.H.2.1	None
Fugitive Sources (abated by ES-300's or ES-60)	61.242-11(c)	Table VII.H.2.1	None
Conoco-Phillips			
Components	60.482-10(c)	None—all subject sources are vented to fuel gas system	None—all subject sources are vented to fuel gas system
Components	60.692-5(a)	None—all subject sources are vented to fuel gas system	None—all subject sources are vented to fuel gas system
Tesoro			
Components	60.482-10(c)	Table VII-CF	Table VII-CF
Components	60.692-5(a)	None (temp monitoring for 60.692-5(b) in Table VII-CF)	None
Components	61.242-11(c)	Table VII-CF	Table VII-CF
Shell			
No affected sources			
Valero & Valero Asphalt			
No affected sources			

The District is proposing to address EPA's concerns by revising Table VII-CF to indicate that existing temperature and flow rate monitoring will also be used to determine compliance with 40 CFR 60.692-5(a).

Changes to the Permit

Section VII

Table VII-CF has been revised to indicate that existing temperature and flow rate monitoring will also be used to determine compliance with 40 CFR 60.692-5(a).

Table VII – CF
Applicable Limits and Compliance Monitoring Requirements
COMPONENTS

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
POC	60.692-5 (a)	Y		Combustion devices ≥ 95% destruction efficiency or ≥ 0.75 seconds and ≥ 816°C		C	Continuous temperature monitoring
POC	60.692-5 (a)	Y		Combustion devices ≥ 95% destruction efficiency or ≥ 0.75 seconds and ≥ 816°C		C	flowrate