


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	<p>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.</p> <p>Corrections have been made to the permit.</p>
2.	Table II B	A904 A927 A950 A971 A1431 A1432 A1433	<p>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.</p> <p>The reference to the citation has been changed in the "Applicable Requirement" column to indicate that 9-10-301 is a "Facility Limit". The limit has been changed in the "Limit or Efficiency" column to indicate that 0.033 lb NOx/MMBtu is a "Facility Limit". The clarification made that these were "Facility Limits" were added in order to keep the abatement device in the table and/or avoid listing an abatement device without having any applicable requirements or limits.</p>
3.	Table II B	A8 A9 A11 A30 A806	<p>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.</p>

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

			Tesoro must establish parameters to monitor by June 1, 2004.
4.	Section VI	#18372	<p>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>.</p> <p>The typographical errors have been corrected. For the requested changes to the language, please refer to the response to WSPA's letter from Steve Hill.</p>

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

5.	Section VI	#19528	<p>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.</p> <p>Part 1 of the comment was not addressed in Revision 1 but will be addressed in Revision 2. In Table IV, Regulation 1-523 Parametric Monitoring and Recordkeeping Procedures will be cited instead of Regulation 1-522 Continuous Emission Monitoring and Recordkeeping Procedures.</p> <p>For Part 2 of the comment, the maximum distance allowed is 0.25 miles in Method 22, Section 11.1. An electronic copy of Method 22 is included in this document (see below).</p> <div style="text-align: center;">  m-22.pdf </div>
6.	Table VII-Ja	S660 S808	<p>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.</p> <p>S660 and S808 were removed from Table VII-Ja. S660 was added to Table VII- J (with S659) since it is also abated by A9 Coker Precipitator.</p>