# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION FIELD OPERATIONS - BUREAU OF AIR QUALITY

#### **OPERATING PERMIT**

AMENDED 4/29/04

In accordance with provisions of the Air Pollution Control Act, the act of January 8, 1960, P.L. 2119, as amended, and after due consideration of an application received under Chapter 127 of the Rules and Regulations of the Department of Environmental Protection, the Department hereby issues this permit for the operation of the air contamination source(s) described below:

Permit No.	OP-23-0003	Source(s)	NO <sub>x</sub> and VOC Emitting Facility	
Owner	Conoco Phillips Company	Air	As Described Herein	
Address	4101 Post Road	Cleaning		
	Trainer, PA 19061	Device		
Attention	Mr. Ken Kerntke	Location	Post Road and Smith Street	
	HSE Manager		Trainer and Marcus Hook Boroughs	
			Delaware County	

This permit is subject to the following conditions:

- 1. That the source(s) and any associated air cleaning devices are to be:
  - a. operated in such a manner as not to cause air pollution;
  - b. in compliance with the specifications and conditions of all applicable Plan Approvals issued;
  - operated and maintained in a manner consistent with good operating and maintenance practices.
- 2. This permit is valid only for the specific equipment, location and owner named above.

Issued 02/16/1996

Francine Carlini
Regional Manager

Air Quality

Division of Permits, RCSOB Administration

SEFO

CC:

Re (RN04)55-14

AMENDED 4/29/04

#### CONDITIONS (continued):

#### 3. General Requirements

- A. This Operating Permit, OP-23-0003 is issued to Tosco Corporation for the operation of oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOCs) emission sources regulated under 25 Pa. Code Sections 129.91 129.95. This Operating Permit, OP-23-0003 also specifies Reasonably Available Control Technology (RACT) requirements for sources of VOCs and NO<sub>x</sub>. Other pollutants are regulated under the applicable provisions of Title 25 of the Pennsylvania Code and by existing permit conditions, which are incorporated herein.
- B. The expiration date shown on the Operating Permit, OP-23-0003, is for state purposes only. For Federal enforcement purposes, this Operating Permit shall remain in effect as part of the Pennsylvania State Implementation Plan (SIP) until repealed pursuant to 40 C.F.R. Part 51 and approved by the United States Environmental Protection Agency (EPA).
- C. The company shall not impose conditions upon or otherwise restrict the Department's access to the aforementioned source(s) and/or any associated air cleaning device(s) and shall allow the Department to have access at any time to said source(s) and associated air cleaning device(s) with such measuring and recording equipment, including equipment recording visual observations, as the Department deems necessary and proper for performing its duties and for the effective enforcement of the Air Pollution Control Act.
- D. If, at any time, the Department has cause to believe that air contaminant emissions from the aforementioned source(s) may be in excess of the limitations specified in, or established pursuant to, any applicable rule or regulation contained in Article III of the Rules and Regulations of the Department of Environmental Protection, the company shall be required to conduct whatever tests are deemed necessary by the Department to determine the actual emission rate(s). Such testing shall be conducted in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection, where applicable, and in accordance with any restrictions or limitations established by the Department at such time as it notifies the company that testing is required.

- 5. RACT Implementation and Source Specific Conditions:
  - A. The following conditions apply only to the Platformer Heater:
    - i. This permit does not restrict the hours of operation of the Platformer Heater.
    - RACT for the Platformer Heater shall be the operation and maintenance of one hundred eight (108) low NO<sub>x</sub> burners.
    - The following air contaminant emission limit, on a 24-hour basis, is approved for this source.
      - (1) Oxides of Nitrogen (NO<sub>x</sub>): 0.2 lb/MMBtu, when firing refinery fuel gas.
    - iv. The following data shall be recorded and kept for a minimum of five (5) years and shall be made available to the Department upon request:
      - The amount of fuel combusted shall be recorded by methods approved by the Department.
      - (2) The heating value of the fuel shall be determined by Department approved methods, which can include gas chromatography (GC) or calorimeter.
    - v. An annual tune-up on the combustion process shall be performed for the Platformer Heater. The annual tune-up shall include, but not limited to, the following:
      - Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
      - 2. Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO<sub>x</sub>,

- Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.
- vi. Each adjustment conducted under the procedures in Condition 5.A.v. shall be recorded in a permanently bound book, or other Department approved method. This log shall contain, at a minimum, the following information:
  - 1. The date of the tuning procedure.
  - The name of the service company and technicians.
  - 3. The final operating rate or load.
  - 4. The NO<sub>x</sub> emission rates.
  - The final excess oxygen rate.
- Emissions of volatile organic compounds shall be minimized by annual combustion tuning, good operating practices, and good air pollution control practices.
- B. The following conditions apply only to the 543 Crude Still Heater:
  - i. This permit does not restrict the hours of operation of the 543 Crude Still Heater.
  - RACT for the 543 Crude Still Heater shall be the operation and maintenance of twelve (12) low NO<sub>x</sub> burners.
  - The following air contaminant emission limit, on a 24-hour basis, is approved for this source.
    - 1. Oxides of Nitrogen (NO<sub>x</sub>): 0.2 lb/MMBtu, when firing refinery fuel gas.

- iv. An annual tune-up on the combustion process shall be performed for the 543 Crude Still Heater. The annual tune-up shall include, but not limited to, the following:
  - Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
  - Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO<sub>x</sub>, and to the extent practicable,
  - Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.
- v. Each adjustment conducted under the procedures in Condition 5.B.iv. shall be recorded in a permanently bound book, or other Department approved method. This log shall contain, at a minimum, the following information:
  - The date of the tuning procedure.
  - 2. The name of the service company and technicians.
  - The final operating rate or load.
  - 4. The final NO<sub>x</sub> emission rates.
  - The final excess oxygen rate.
- vi. Emissions of volatile organic compounds shall be minimized by annual combustion tuning, good operating practices and good air pollution control practices.
- vii. The following data shall be recorded and kept for a minimum of five (5) years and shall be made available to the Department upon request:
  - The amount of fuel combusted shall be recorded by methods approved by the Department.

- The heating value of the fuel shall be determined by Department approved methods, which can include gas chromatography (GC) or calorimeter.
- C. The following conditions apply only to the 544 Crude Still Heater:
  - i. This permit does not restrict the hours of operation of the 544 Crude Still Heater.
  - RACT for the 544 Crude Still Heater shall be the operation and maintenance of twelve (12) low NO<sub>x</sub> burners.
  - iii. The following air contaminant emission limit, on a 24-hour basis, is approved for this source:
    - 1. Oxides of Nitrogen (NO<sub>x</sub>): 0.2 lb/MMBtu, when firing refinery fuel gas.
  - iv. An annual tune-up on the combustion process shall be performed for the 544 Crude Still Heater. The annual tune-up shall include, but not limited to, the following:
    - Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
    - Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO<sub>x</sub>, and to the extent practicable
    - Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.
    - v. Each adjustment conducted under the procedures in Condition 5.C.iv shall be recorded in a permanently bound book, or other Department approved method. This log shall contain, at a minimum, the following information:
      - The date of the tuning procedure.
      - The name of the service company and technicians.

- 3. The final operating rate or load.
- 4. The final NO<sub>x</sub> emission rates.
- The final excess oxygen rate.
- Emissions of volatile organic compounds shall be minimized by annual combustion tuning, good operating practices and good air pollution control practices.
- vii. The following data shall be recorded and kept for a minimum of five (5) years and shall be made available to the Department upon request:
  - The amount of fuel combusted shall be recorded by methods approved by the Department.
  - The heating value of the fuel shall be determined by Department approved methods, which can include gas chromatography (GC) or calorimeter.
- D. The following conditions apply only to the No. 8 Boiler, No. 7 Boiler, No. 6 Boiler, 544 Vacuum Heater, FCC Feed Heater, VGO Heater, ISO Feed Heater, ISO Splitter Heater, and Naphtha Heater:
  - i. RACT for the No. 8 Boiler, No. 7 Boiler, No. 6 Boiler, 544 Vacuum Heater, FCC Feed Heater, VGO Heater, ISO Feed Heater, ISO Splitter Heater, and Naphtha Heater shall be an annual tune-up on the combustion process. The annual tune-up shall include, but not be limited to, the following:
    - Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
    - Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO<sub>x</sub>, and to the extent practicable
    - Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

#### CONDITIONS (continued):

- ii. Each adjustment conducted under the procedures in Condition 5.D.i. shall be recorded in a permanently bound book, or other Department approved method. This log shall contain, at a minimum, the following information:
  - 1. The date of the tuning procedure.
  - 2. The name of the service company and technicians.
  - The final operating rate or load.
  - 4. The final NOx emission rates.
  - The final excess oxygen rate.
- Emissions of volatile organic compounds (VOC) shall be minimized by annual combustion tuning, good operating practices and good air pollution control practices.
- iv. The following air contaminant emission limits, on a 30 day rolling average are approved for these sources:
  - For the No. 8 Boiler, the emission of nitrogen oxides (NO<sub>x</sub>) shall be limited to 0.65 lb/MMBtu when combusting refinery fuel gas or combusting refinery fuel oil.
  - For the No. 7 Boiler, the emission of nitrogen oxides (NO<sub>x</sub>) shall be limited to 0.52 lb/MMBtu when combusting refinery fuel gas or refinery fuel oil.
  - For the No. 6 Boiler, the emission of (NO<sub>x</sub>) shall be limited to 0.65
     lb/MMBtu when combusting refinery fuel gas or burning refinery fuel oil.
  - 4. For the 544 Vacuum Heater, the emissions of nitrogen oxides (NO<sub>x</sub>) shall be limited to 0.55 lb/MMBtu when combusting refinery fuel gas.
  - 5. For the FCC Feed Heater, the emission of nitrogen oxides (NO) shall be limited to 2.5 lb/MMBtu when combusting refinery fuel gas?
  - 6. For the VGO Heater, the emissions of nitrogen oxides (NOx)/shall become limited to 0.32 lb/MMBtu when combusting refinery fuel gas.

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- 7. For the ISO Feed Heater, the emissions of nitrogen oxides (NOx) shall be limited to 0.55 lb/MMBtu when combusting refinery fuel gas.
- 8. For the ISO Splitter Heater, the emissions of nitrogen oxides (NOx) shall fimited to 0.45 lb/MMBtu when combusting refinery fuel gas.
- For the Naphtha Heater, the emissions of nitrogen oxides (NOx) shall be limited to 0.2 lb MMBtu when combusting refinery fuel gas.
- v. Combustion tune-ups shall be performed annually.
- E. The following conditions apply only to the 542 Vacuum Heater:
  - RACT for the 542 Vacuum Heater shall be an annual tune-up on the combustion process. The annual tune-up shall include, but not be limited to, the following:
    - Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
    - Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO<sub>x</sub>, and to the extent practicable.
    - Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.
  - ii. Each adjustment conducted under the procedures in Condition 5.E.i. shall be recorded in a permanently bound book, or other Department approved method. This log shall contain, at a minimum, the following information:
    - The date of the tuning procedure.
    - 2. The name of the service company and technicians.
    - 3. The final operating rate or load.
    - 4. The final NO<sub>x</sub> emission rates.

## CONDITIONS (continued):

- The final excess oxygen rate.
- iii. Emissions of volatile organic compounds shall be minimized by annual combustion tuning, good operating practices, and good air pollution control practices.
- iv. Combustion tune-ups shall be performed annually.

F.

- G. The source identified as the Diesel Heater shall conform with the following presumptive RACT requirements (25 Pa. Code Sections 129.93(b)(2) and (b)(3)):
  - An annual adjustment or tune-up on the combustion process shall include, but not be limited to, the following:
    - Inspection, adjustment, cleaning or replacement of fuel burning equipment, including the burners and moving parts necessary for proper operation as specified by the manufacturer.
    - Inspection of the flame pattern or characteristics and adjustments necessary to minimize total emissions of NO<sub>x</sub>, and to the extent practicable
    - Inspection of the air-to-fuel ratio control system and adjustments necessary to ensure proper calibration and operation as specified by the manufacturer.

- ii. Each adjustment conducted under the procedures in Condition 5.G.i. shall be recorded in a permanently bound book, or other Department approved method. This log shall contain, at a minimum, the following information:
  - 1. The date of the tuning procedure.
  - The name of the service company and technicians.
  - The final operating rate or load.
  - 4. The final NO<sub>x</sub> emission rates.
  - The final excess oxygen rate.
  - Emissions of volatile organic compounds shall be minimized by annual combustion tuning, good operating practices and good air pollution control practices.
- H. RACT for the sources identified as the Platformer Regenerator SCOT Heater/Incinerator, Acid Gas Flare Sour Gas Flare, Main Flare, and Back-up Flare shall be maintained and operated in accordance with manufacturer's specifications (25 Pa. Code Section 129.93(c)). The sources shall also be operated and maintained in accordance with good air pollution control practices.
- The following conditions apply only to the Diesel Firewater Pump, AWWTP Diesel Generator, Control Center Diesel Generator, and Kero Heater:
  - RACT for the Diesel Firewater Pump, AWWTP Diesel Generator, Control Center Diesel Generator, and Kero Heater shall be maintenance and operation in accordance with manufacturer's specifications (25 Pa. Code Section 129.93(c)). The sources shall also be operated and maintained in accordance with good air pollution control practices.
- J. The following conditions apply only to the Peabody Heater:
  - The Peabody Heater shall only be used during the start-up after a shutdown of the FCC unit.

- RACT for the Peabody Heater shall be maintenance and operation in accordance with manufacturer's specifications (25 Pa. Code Section 129.93(c)). The source shall also be operated and maintained in accordance with good air pollution control practices.
- K. The following condition(s) apply only to the FCC/ ... Boiler.
  - i. The emissions of nitrogen oxides (NOx) shall be limited to 500 ppmdv.
  - The company shall maintain and operate the FCC/ Boiler in accordance with good air pollution control practices.
- L. The following conditions apply only to the Cooling Towers:
  - Emissions from the Cooling Towers shall be minimized by operating and maintaining the cooling system in accordance with good engineering practices.
- M. The owner shall maintain records for all de-minimis source categories, in a Department approved format, to demonstrate compliance with the de-minimis limits for VOC of three pounds per hour, fifteen pounds per day and 2.7 tons per year for each category.
- N. Fixed roof storage tanks >2,000 gallons containing VOCs with a vapor pressure less than or equal to 1.5 psia shall be operated in accordance with applicable requirements specified in 25 Pa. Code Section 129.56 or 25 Pa. Code Section 129.57.
- Emissions from Marine Ballasting shall be controlled in accordance with standards promulgated in 25 Pa. Code Section 129.81.
- P. Emissions from wastewater separators, pumps and compressors, turnaround, and purging, sampling and blind changing shall be minimized in accordance with 25 Pa. Code Section 129.55.
- Q. Refinery fugitive emissions, not otherwise regulated by permits referenced in condition No. 4, "Consolidation of Operating Permit," shall be minimized in accordance with 25 Pa. Code Section 129.58.
- R. The following conditions(s) apply to the propane/butane loading rack:
  - The emissions of VOCs from the loading rack shall be limited to 3.94 tons in a 12-month rolling period.

#### CONDITIONS (continued):

6.

- The company shall record the number of railcars that vent to the atmosphere during loading as well as the amount of propane or butane loaded.
- - A. This Operating Permit, OP-23-0003, is issued to Tosco Corporation for the operation of the LPG Recovery Unit, at the Trainer Refinery facility located in Trainer Borough, Delaware County. The LPG Recovery Unit will consist of the following components:
    - i. a refrigeration unit and flash unit,
    - ii. de-ethanizer (existing) towers,
    - iii. potassium hydroxide treatment unit,
    - iv. 32,000 barrels of propane storage,
    - v. rail car transfer operation,
    - vi. associated valves, flanges, pumps, and compressors; and,
    - viii. amine treater.

B.

#### CONDITIONS (continued):

- All pumps in VOC service shall have dual mechanical seals installed to control the emissions of VOCs.
- iii. 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 VOC above background, as determined by the methods specified in 40 C.F.R. Section 60.485(c).
  - 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 VOC above background, as soon as practicable, but
    not later than five calendar days after the pressure release, except as
    provided in 40 C.F.R. Sections 60.482 9.
  - No later than five 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 VOC above background, as determined by the methods specified in 40 C.F.R. Section 60.485(c).

iv.

- V. When a leak is detected, the company shall repair the leak as soon as practicable but not later than fifteen calendar days after it is detected. In addition, a first attempt at repair shall be made not later than five calendar days after each leak is detected.
- vi. Delay of repair of equipment for which leaks have been detected will be allowed if the repair is technically infeasible without a process unit shutdown. Repair of this equipment shall occur before the end of the next process unit shutdown.
- vii. The LPG Recovery Unit shall not be limited in its hours of operation.
- viii. The LPG Recovery Unit shall be installed, maintained and operated according to manufacturer's specifications.

## CONDITIONS (continued):

#### C: Emission Limitations

- The following air contaminant emission limit is approved for the LPG Recovery Unit:
  - Volatile Organic Compounds (VOCs): 4.6 tons of VOC in a year, calculated on a semi-annual period.
- ii. The LPG Recovery Unit shall comply with provisions contained in 25 Pa. Code Section 123.31(b).
- The LPG Recovery Unit shall comply with provisions contained in 25 Pa. Code Section 123.41.

#### D. Monitoring Requirements:

- The company shall monitor all pumps and valves for leaks (as that term is defined in 40 C.F.R. Sections 60.482-2 and 60.482-7) at least once per month.
  - Any valve for which a leak is not detected for two successive months may be monitored the first month of every quarter, beginning with the next quarter, until a leak is detected.
  - 2. If a leak is detected, the valve shall be monitored monthly until a leak is not detected for two successive months.

## E. Recordkeeping Requirements

Sufficient data shall be recorded, in a format approved by the Department, so that compliance with Condition 6 of this Operating Permit can be determined. Records shall be kept for a minimum of five (5) years and shall be made available to the Department upon request.

 The company shall keep, on-site, a copy of all the manufacturer's specifications for the installation, operation, and maintenance of the LPG recovery unit.

## CONDITIONS (continued):

7.

A. This Operating Permit, OP-23-0003, is issued to Tosco Corporation for the operation of the 542 Vacuum Heater, at the Trainer Refinery facility located in Trainer Borough, Delaware County. The 542 Vacuum Heater was manufactured by Born, Inc., with a rated capacity of 57 MMBtu/hr and a peak heat input capacity of 72 MMBtu/hr.

#### B. Operational Limitations

The 542 Vacuum Heater is subject to Subpart I of the Standards for New Stationary Sources and shall comply with all applicable requirements of this Subpart. 40 C.F.R. Section 60.4 requires submission of copies of all requests, reports, applications, submittals, and other communications to both the EPA and the Department. The EPA copies shall be forwarded to:

Director
Air, Toxics and Radiation Division
U.S. EPA, Region, III
1650 Arch Street
Philadelphia, PA 19103

- The 542 Vacuum Heater shall be limited to firing only refinery fuel gas, natural gas or a combination of natural gas and refinery fuel gas.
- iii. The 542 Vacuum Heater shall not be limited in its hours of operation.
- iv. The company shall use a gas chromatograph, or an equivalent procedure approved by the Department, to determine the heat content of the refinery fuel gas, on a daily basis.
- v. The company shall limit the amount of refinery gas combusted in the 542 Vacuum Heater to 72 million Btu per hour and 500,500 million Btu per year, calculated on a 365-day rolling basis.

#### CONDITIONS (continued):

vi. The company shall, calculate on a daily basis, the hourly heat input rate into the 542 Vacuum Heater.

#### C. Emission Limitations

- The following air contaminant emission limits, during a 12-month rolling period, are approved for the 542 Vacuum Heater:
  - Volatile Organic Compounds (VOCs): 0.18 lbs/hr and 0.79 tons of VOC in a 12-month rolling period.
  - Nitrogen Oxides (NO<sub>x</sub>): 10.8 lbs/hr and 31.3 tons in a 12-month rolling period.
  - 3. The second of the second of
  - 4.
- ii. The company shall limit the hydrogen sulfide in the refinery fuel gas combusted in the 542 Vacuum Heater to 0.1 grains per dry standard cubic foot, or less as required by 40 C.F.R. Section 60.104(a)(1).
- The 542 Vacuum Heater shall comply with the provisions contained in 25 Pa.
   Code Section 123.31(b), regarding emissions of malodors.
- The 542 Vacuum Heater shall comply with the provisions contained in 25 Pa. Code Section 123.41, regarding visible emissions.

## D. Monitoring Requirements

- The company shall monitor, on a daily basis, the heating value of the refinery fuel gas.
- The company shall monitor, on a daily basis, the amount of refinery fuel gas combusted in the 542 Vacuum Heater.

#### CONDITIONS (continued):

iii. The company shall monitor, on a daily basis, the heat input into the 542 Vacuum Heater.

iv.

v. The continuous emission monitoring system(s) for H<sub>2</sub>S as previously approved by the Department, must be operated and maintained in accordance with the quality assurance, recordkeeping and reporting requirements of Chapter 139 of the Department of Environmental Protection's Rules and Regulations and the Department's Continuous Source Monitoring Manual. The required data reports shall be submitted to the Department's Central Office, in hardcopy and computer readable-media formats as specified by the Department, within thirty (30) days following the close of each calendar quarter.

#### E. Recordkeeping Requirements

Sufficient data shall be recorded, in a format approved by the Department, so that compliance with Condition 7 of this Operating Permit can be determined. Records shall be kept for a minimum of five (5) years and shall be made available to the Department upon request.

- The company shall keep a record of the daily monitoring of the refinery fuel gas heat content.
- The company shall keep a record of all material that is required by 40 C.F.R. Part 60, Subpart J.
- iii. The company shall keep a daily record of the amount of refinery fuel gas and/or natural gas combusted.
- The company shall keep a record of the daily heat input into the 542 Vacuum Heater.
- V. The company shall keep a record of the hourly heat input rate into the 542 Vacuum Heater.

## CONDITIONS (continued):

Appendix A

Identity of Sources and Control Options for NO<sub>X</sub> Emitting Sources

Source Description	Rated Capacity MMBtu/hr¹	Fuel Used	Control Technology
Platformer Heater	917	FG	Low NO <sub>x</sub> Burners
No. 8 Boiler	335	FO/FG	Combustion Tuning
No. 7 Boiler	335	FO/FG	Combustion Tuning
FCC/CO Boiler	248	FO/FG	None
543 Crude Heater	360	FG	Low NO <sub>x</sub> Burners
544 Crude Heater	360	FG	Low NO <sub>x</sub> Burners
No. 6 Boiler	180	FO/FG	Combustion Tuning
544 Vacuum Heater	160	FG	Combustion Tuning
FCC Feed Heater	100	FG	Combustion Tuning
542 Vacuum Heater	72.0	FG/NG	Low NOx Burners
Naphtha Heater	65.0	FG	None
541 Vacuum Heater	56.3	FG/NG	Low NOx Burners
.so Splitter Heater	76.0	FG	Combustion Tuning
VGO Heater	56.0	FG	Combustion Tuning
Diesel Heater	23.0	FG	Presumptive
Iso Feed Heater	56.0	FG	Combustion Tuning
Kero Heater	19.2	FG	Presumptive
Platformer Regenerator	1	FG	Presumptive
SCOT Heater/Incinerator	4	NG	Presumptive
Acid Gas Flare		NG	Presumptive
Sour Gas Flare		NG	Presumptive
Main Flare		NG/WG	Presumptive
Back-up Flare		NG/WG	Presumptive
Peabody Heater	62	FG	Presumptive
Diesel Firewater Pump		No. 2 FO	Presumptive
AWWTP Diesel Generator	750 KW	No. 2 FO	Presumptive
Control Center Diesel Generator	200 KW	No. 2 FO	Presumptive

<sup>1</sup>Unless otherwise noted

FG=Fuel Gas

FO=Fuel Oil

NG=Natural Gas

WG=Waste Gas

<sup>&</sup>lt;sup>2</sup> Removed From Service on February 1996.

## CONDITIONS (continued):

Appendix B

## Identity of Sources and Control Options for VOC Emitting Sources

Source Description	Control Technology	
Storage Tanks Capacity < 2,000 gallons or Vapor Pressure < 1.5 Psia.	De-minimis	
Cold Cleaning Degreasers	De-minimis	
Drains	None	
Cooling Towers	Maintenance Program	
Barge Loading, No. 2 Fuel Oil	De-minimis	
Barge Loading, No. 6 Fuel Oil	De-minimis	
Barge Loading, Kerosene	De-minimis	
WWTP Primary Filters	De-minimis	
WWTP Clarifiers (3)	De-minimis	
WWTP Backwash Tank No. 1	De-minimis	
WWTP Backwash Tank No. 2	De-minimis	
Solids Handling Tank, T-8	De-minimis	
Solids Handling Tank, T-9	De-minimis	
Solids Handling Tank, T-10	De-minimis	
Solids Handling Tank, T-11	De-minimis	
Solids Handling Tank, T-12	De-minimis	
Solids Handling Tank, T-13	De-minimis	
Gasoline Fueling	De-minimis	
Painting	De-minimis	
Laboratories	De-minimis	

Re 30 (RN04)55-15

