

SECTION V

TYPOGRAPHICAL ERRORS, MISTAKES AND OTHER CORRECTIONS

- A. Sulfur Recovery System
- B. Other Combustion Sources
- C. Cooling Water Towers
- D. Tanks
- E. Process Units
- F. Paint Booths and Solvent Use
- G. Miscellaneous Sources
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A. Sulfur Recovery System

1. **Delete Condition 12271 Part 115 Because It Duplicates Condition 18618 Part 10.** These conditions are identical except that Condition 12271 part 115 applies only to OPCEN Sulfur Plant 4 (SRU4) (S4180), while Condition 18618 Part 10 applies to all sources subject to BAAQMD 9-1-313.2 (all of the sulfur plants and facility wide).

B. Other Combustion Sources

2. **Add Gas Turbine and Duct Burners (S4190 through S4193) to Table IV B.** These sources now have a throughput limit in Condition 18618, Part 1.
3. **Add Gas Turbine and Duct Burners (S4190 through S4193) to Table VII-A.** These sources now have a throughput limit in Condition 18618, Part 1 and are subject to Condition 18618, Part 2.
4. **In Table IV-DNa for Standby Engines, consider deleting BAAQMD 6-305 or add that it is federally enforceable.** Consider deleting BAAQMD 6-305, because it is not likely that standby diesel engines will emit visible particles large enough to fall on property other than Shell Martinez Refinery.
5. **In Table IV-DNa for Standby Engines, Delete BAAQMD 9-1-301.** This is a facility wide requirement and is already included in Table IV-DV. This ground level concentration applies to the entire facility, not an individual source.
6. **Delete Redundant Words in Condition 19097, Part 7 for Standby Engines.** Delete “shall be checked for” because it is repeated twice.
7. **In Section VI, Modify Condition 19097, Part 7.** Modify the condition to read “The engines shall be checked for visible emissions after combustion of 1,000,000 gallons of liquid fuel.” Inspection after 1,000 gallons is too frequent for ten IC engines that are being tested regularly.
8. **In Table VII-CY (Facility), Change The Monitoring Requirement For BAAQMD 9-1-313.2 To Condition 18618 Part 10.** Replace Condition 12271 Part 115 with Condition 18618 Part 10. Condition 12271 Part 115 applies

only to S4180, whereas Condition 18618 Part 10 applies to all sources subject to BAAQMD 9-1-313.2. Since Table VII-CY contains facility wide requirements, Condition 18618 Part 10 is the appropriate monitoring condition.

- 9. In Table IV-AQ, Correct Description Of Condition 18618 Part 10.** This condition reads source test to demonstrate compliance with BAAQMD 9-1-313.2. Source testing is no longer required. It should read analysis and recordkeeping.
- 10. In Table IV-AQ, Correct Federal Enforceability Of Condition 18618 Part 10.** This condition is not federally enforceable.
- 11. In Condition 12271 Part 111, Add Language To The End Of The Condition.** Add the following to the end of the condition: The frequency of source testing required under this condition shall be reduced to once every five years if three consecutive annual source tests document that emissions are less than 50 percent of the standard. The frequency of source testing shall revert back to once per year, if a source test documents that emissions are 50 percent of the standard or more. The source testing frequency can again be reduced to once every five years if another three consecutive annual source tests document that emissions are less than 50 percent of the standard. [basis: Regulation 2-6-409.2]
- 12. In Condition 12271 Part 112, Add Language To The End Of The Condition.** Add the following to the end of the condition: The frequency of source testing required under this condition shall be reduced to once every five years if three consecutive annual source tests document that emissions are less than 50 percent of the standard. The frequency of source testing shall revert back to once per year, if a source test documents that emissions are 50 percent of the standard or more. The source testing frequency can again be reduced to once every five years if another three consecutive annual source tests document that emissions are less than 50 percent of the standard. [basis: Regulation 2-6-409.2]
- 13. In Condition 12271 Part 113, Add Language To The End Of The Condition.** Add the following to the end of the condition: The frequency of source testing required under this condition shall be reduced to once every five years if three consecutive annual source tests document that emissions are less than 50 percent of the standard. The frequency of source testing shall revert back to once per year, if a source test documents that emissions are 50 percent of the standard or more. The source testing frequency can again be reduced to once every five years if another three consecutive annual source tests document that emissions are less than 50 percent of the standard. [basis: Regulation 2-6-409.2]
- 14. Correct typo in Table IIB, Row A-33.** The citation 40 CFR 60.112(b)(3)(ii) should read 40 CFR 60.112b(a)(3)(ii).
- 15. Add Monitoring Citation to Tables VII-L, VII-Y, VII-AM, VII-BS and VII-CO.** For the numeric limit in NESHAP Subpart FF 63.649(a)(2)(ii), add the

monitoring citation, 40 CFR 63.640(d)(5). The monitoring frequency and type are none, because no testing, monitoring, recordkeeping, or reporting is required for refinery fuel gas systems or emission points routed to refinery fuel gas systems.

- 16. Renumber Condition 7382, Parts 3, 4 and 5. Condition 7382, Parts 1, 2, and 3 (which apply to S1005) were correctly reinstated into Section VI.** However, in Condition 7382, the Parts for S1072 were incorrectly re-numbered from 1, 2 and 3 to 3, 24, and 5. Correctly renumber them to 4, 5, and 6.
- 17. Delete Visible Emission Inspections to Demonstrate Compliance with Grain Loading.** On Tables VII-AP, AR, AX, BB and CH. Condition 18618, Parts 3 and 7 for visible emissions inspections after 1 MM gallon fuel combusted should be deleted as the monitoring requirement for the 6-310.3 FP limit. It is not feasible to demonstrate compliance with a particulate grain loading limit using visible inspections. Replace Condition 18618, Parts 3 and 7 with None.
- 18. Add Condition 16688, Part 1 to Table IV-BZ (S1800).**
- 19. Correct or Delete Condition 17533, Part 15.** This part inappropriately references Permit #26876. Either the Condition 17533 Part 15 should include the requirement or it should be deleted. This deletion should be made throughout the document.
- 20. In Table VII-AP, Correct the Spelling of Sampling.** Change “sampline” to “sampling”. This is a typo.
- 21. On Table VII-CE For S4161, Change the Monitoring Type for the Subpart J SO₂ Limit and Monitoring Under 60.105(A)(4) from “Monitoring, Records, and Reporting” to “H₂S Analyzer”.** 60.105(A)(4) states “In place of the SO₂ monitor in paragraph (a)(3) of this section, an instrument for continuously monitoring and recording the concentration (dry basis) of H₂S in fuel gases before being burned in any fuel gas combustion device.” An H₂S analyzer is the instrument to be used to monitor the H₂S concentration for compliance with the limit.
- 22. Add a Permit Shield for the 9-1-502 Requirements for Continuous Monitoring Under 1-522.** The 9-1-502 requirements appear to be superseded by Condition 18618, Part 4 for the following sources: S1476, S1477,.. Note that a previous comment suggested the addition of 9-1-502 for completeness in Section IV applicability. Condition 18618, Part 4 requires sampling and analysis of sulfur content of the fuel to demonstrate SO₂ emissions compliance. This method is effective, since SO₂ emissions are presumed to be the result of, and cannot exceed, 100% oxidation of sulfur molecules in the fuel. This presumption negates the need for continuous emissions monitoring of SO₂.

C. Cooling Tower

23. Cooling Water Tower Process Weight Rate. Table VII-AJ for the cooling water towers includes BAAQMD 6-311, which limits particulate emissions based on process weight rate. This rule does not apply to cooling towers and should be deleted from this table. Note that this requirement does not appear in the corresponding Section IV tables, so no change is required in Section IV.

24. Delete BAAQMD 8-2-301 Requirements From Tables IV-AS, CY and Table VII-AJ. Cooling towers at Shell are exempted by Rule 8-2-114. "Emissions from cooling towers...are exempt from this Rule, provided best modern practices are used." Shell described its cooling water tower practices in an application provided to BAAQMD in May 2003. Shell notes that the BAAQMD engineering evaluation dated May 29, 2003, does not address the specific exemption for cooling towers in Rule 8-2-114.

D. Tanks

25. Delete the Word "Combined" in Condition 20042, Part 1 for Tank 17095 (S-17095). In Section VI, Condition 20042, Part 1, delete the word "combined" because the throughput is from one source and is not a combined throughput.

26. Delete Table IV-AG and Table VII-AA for S1116 - Tank 1116 Fresh Acid. This sulfuric acid tank does not emit particulates or acid mist. In Table IV-AG, delete 6-301 as the basis for the concentration limit on the acid. Also delete all Regulation 6 requirements

27. Delete Table IV-Kb. Change "See Table IV-J..." to "See Table IV-Jb..."

28. Correct Typo in VII – CM Header. Put "S" in front of 4311 making it S4311.

29. Correct Monitoring Frequency in Table VII-CG. For condition 60.333(b), change frequency code form "P" to "P/E (upon transfer to storage tank from another source)."

30. Correct Monitoring Frequency in Table VII-CA. For condition #12271, Part 11, change "P/E" to "P/A."

31. Clarify Emission Calculation Procedures in Condition 12771 Part A. The second paragraph in Part A reads

"Emissions shall be calculated in accordance with the emission calculation procedures used in this permit application, and summarized in Appendix B..."

Replace the reference to the application and Appendix B with the actual procedure.

32. **Table VII-I, J. Add the citation for 8-5-401.1 requirement citation for monitoring citation of 8-5-501.2.** In Table VII-J, change the monitoring citation for 8-5-328.1.1 from 8-5-501 to 8-5-501.1. These are external floating roof tanks.
33. **Table VII-P. Add the citation for 8-5-401.1 requirement citation for monitoring citation of 8-5-501.2.**
34. **Delete Monitoring Requirements Pertaining to Condition 6707 Part 2.b.i and ii from Table VII-BW.** Monitoring should say none. Since the POC and toxics emissions were originally evaluated based on worst case conditions at the allowable throughput, the POC emissions and toxics emissions inherently will not exceed the requirements of Part 2.b.i and ii
35. **Delete Monitoring Requirements Pertaining to Condition 18646 Part 2.b.i and ii from Table VII-F.** Monitoring should say none. Since the POC and toxics emissions were originally evaluated based on worst-case conditions at the allowable throughput, the POC emissions and toxics emissions inherently will not exceed the requirements of Part 2.b.i and ii.
36. **Correct Internal Floating Roof Requirements in Table IX B-2 Permit Shield for Subsumed Requirements.** Citation 60.115b(b) should be changed to 60.115b(a) Reporting and Recordkeeping Requirements for IFRTs (not EFRTs).

E. Process Units

37. **On Table VII-CA, Correct The Condition 12271, Part 11 VOC Emission Limit From “19.3 Tpy” To “193.5 Tpy”.**
38. **Modify Table VII – AG For S1426 With The Following Changes:**
39. **Delete the “source testing” from the monitoring type citation for 60.102(a)(1) PM standard.** The ongoing compliance method is the 60.105 daily recordkeeping requirements.
40. **Delete 40 CFR 60.106(g) and 60.107 performance testing and notification requirements from the monitoring requirement citations for the 60.104(b)(2) SO2 standard.** The initial performance tests and notifications have been completed. The 40 CFR 60.108(d) 24-hr testing requirement should be deleted from Table VII-AG and shielded by 60.106(i)(12) which allows an alternative monitoring method. 40 CFR 60 106(e) should be deleted from Table VII because it is not a routine monitoring requirement, instead it allows future flexibility to change the compliance standard under 60.104(b).

- 41. In Table IV-AP, Delete “SJT1” and “SJT2” from Descriptions in 63.1565(b)(1).** This was a note (initials) that appears to still be in the document.
- 42. In Table IV-AP, Citation 63.1570(e), change “SSMPP” to “SSMP”.** This is a typo.
- 43. Replace the 40 CFR Part 63 Subpart A References in Section IV Table AP Excluding the Following Subparts.** These subparts do not apply to sources listed in Table AP.
- 63.6(b)(6)
 - 63.6(c)(3)-(4)
 - 63.6(d)
 - 63.6(f)(2)(iii)(D)
 - 63.6(h)(2)(i) and (ii)
 - 63.6(h)(3)
 - 63.6(h)(5)
 - 63.6(h)(7)(iii)
 - 63.6(i)(15)
 - 63.10(c)(7)-(8)
 - 63.10(d)(2)
 - 63.10(e)(3)

F. Paint Booths and Solvent Cleaning

- 44. In Table IV-CD, Modify Table IV-CD For Parts And Solvent Cleaners (S1900, S1902 And S1903).** The description for 8-16-501.3 should read “monthly” rather than “annual”.
- 45. In Table VII-BN, Make The Following Changes Because 8-31 Were Amended On October 16, 2002:** For the monitoring frequency for citation 8-31-306, add P/M for monthly records of cleanup and surface preparation solvent used.
- 46. On Table VII-BP For The Maintenance Degreasers And Cleaners, Delete The “P/E – Visual Inspection” For BAAQMD 8-16-303.4.1 And Replace With None.** There is no basis for the visual inspection.

G. Miscellaneous Sources

- 47. Revised SIP Rule 8-7 11/06/2002.** Table IV BO cites Rule 8-7 for Gasoline Dispensing Facilities (11/17/99). A revised Rule 8-7 was approved in the SIP 11/06/2002. Consequently, for Table VII-BD, add for requirements 8-7-301.6 and 8-7-302.5 the testing requirement in 8-7-301.13. Add for requirement 8-7-302.14 the testing requirements in 8-7-302.14.

- 48. Modify Conditions 18618, Part 5 to Have an Annual Visible Emissions Check Instead of Quarterly.** Historically, the sand hopper, coke silos, and dry fines silo have not posed visible emissions issues, since they are operated with methods to minimize fugitive dust. Reduce this requirement from quarterly to annual.
- 49. Visible Emissions Monitoring.** If Condition 18618, Part 5 is Not Modified to Have an Annual Visible Emissions Check Instead of Quarterly, Then Add Language that Will Reduce Monitoring After Four Quarters of Visible Emissions Checks Indicate No Visible Emissions. Historically, the sand hopper, coke silos, and dry fines silo have not posed visible emissions issues, since they are operated with methods to minimize fugitive dust. Reduce this requirement from quarterly to annual.
- 50. On Table VII-BE For The S1650 Sandblasting Sand Hopper, Delete Condition 18618, Part 5 And Replace With None.** Condition 18618, Part 5 visible emissions monitoring requirement is not an appropriate method for demonstrating compliance with the grain loading limit of BAAQMD 6-311.
- 51. In Table VII-BG for S1767, S1768, and S1769, Delete Condition 18618, Part 5 And Replace With None.** Condition 18618, Part 5 visible emissions monitoring requirement is not an appropriate method for demonstrating compliance either with the grain loading limits of BAAQMD 6-310 and 6-311 or the control efficiency requirement of Condition 7618, Part D.3.
- 52. In Table VII-BZ for S4005 Coke Handling Facility, Delete Condition 12271, Parts 75, L And M As The Monitoring Requirements For The Condition 12271, Parts 79 And 81 PM Limits.** Condition 12271, Part 75 is a visible emission limit, not a monitoring requirement. Replace Part 75 with None as there is no appropriate compliance monitoring requirement to demonstrate compliance with the Parts 79 and 81 grain loading limits.
- 53. Condition 7618 List Of Applicable Sources Still Appears To Have Errors.** Shell previously recommended deleting this list because it was unnecessary and has errors. See previous comments from 2001 to the present that identify errors and correct them.
- 54. Condition 7618 Is Listed Incorrectly For Many Sources in Section IV and VII Tables.** Review previous comments from 2001 to the present that identify errors and correct them. Also Shell will provide additional clarifications. Due to time constraints, Shell was unable to list all of the errors related to this condition that still exist in the draft Title V permit.
- 55. Modify Condition 4041, Part 10 to Have an Annual Visible Emissions Check, If Operated, Rather Than Quarterly.** Historically, the coke corral has not had visible emissions, because it is operated with methods to minimize fugitive dust. Reduce this requirement from quarterly to annual.
- 56. On Table VII-BM for the S1803 Coke Corral, change the monitoring frequency for Condition 4041, Part 10 from “P/E” to “P/A” or P/Q (unless**

the condition language is being modified to require the monitoring only during operation of the Coke Corral).

- 57. On Table VII-BM for the S1803 Coke Corral, delete Condition 4041, Parts 10 and 11 as the monitoring requirement for BAAQMD 6-311.** The visible emission inspection is not an appropriate method to demonstrate compliance with the 6-311 grain loading particulate matter limit.
- 58. On Table VII-BM for the S1803 Coke Corral, delete the averaging period “for no more than 3 minutes/hour” for Condition 4041, Part 3, or modify the permit condition language to include the averaging period.**
- 59. Delete Condition 18618, Part 11 Startup/Shutdown Notification Requirements From Table IV-DV For Facility-Wide Applicability.** This permit condition should only be listed on the Table IV's for the process units included in the condition limited. Note, if the Condition 18618 Part 11 is deleted from Section VI, then delete it from the entire document.

H. All Sources

- 60. Delete NESHAP Requirements 63.52 through 63.53 in the Facility-Wide Table IV-DV.** These citations require applications for specific source categories, i.e. combustion turbines, site remediation, process heaters, etc. Some categories are not applicable, such as the MACT for Organic Liquid Distribution. Also the Reciprocating Internal Combustion MACT was withdrawn. Each of these requirements needs to be evaluated on a source-by-source basis. If any are applicable they should be put in source specific tables and not the facility-wide table.
- 61. Correct Subpart A Requirements.** There are still errors in many of the tables regarding Subpart A requirements associated with NSPS, NESHAPS and MACT standards. These should be corrected.