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Administrator Stephen L. Johnson
U.S. Environmental Protection Agency
Ariel Rios Building, Mail Code 1101A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460
Fax Number: (202) 501-1450

VIA FACSIMILE AND CERTIFIED MAIL

December 17, 2008

Re: Petition for objection to proposed Title V Permit No. 339643 for Paramount Refinery, Facility ID: 800183, located at 14700 Downey Avenue, Paramount, CA 90723

Dear Administrator Johnson:

Enclosed is a petition requesting that the Administrator of the U.S. Environmental Protection Agency object to the proposed Title V Federal Operating Permit No. 339643, issued to Paramount Petroleum Corporation, a wholly owned subsidiary of ALON USA Energy, Inc. (ALON) for operation of the Paramount Refinery. Pursuant to Section 505(b)(2) of the Clean Air Act, 42 U.S.C. § 7661d(b)(2) and 40 C.F.R. § 70.8(d), this petition is timely submitted by Environmental Integrity Project, Coalition for a Safe Environment and Communities for a Better Environment (Petitioners). Petitioners are providing a copy of this Petition to the South Coast Air Quality Management District (AQMD) and ALON. Petitioners are also providing a courtesy copy of this Petition to the EPA Region 9 Air Permit Section Chief.

Thank you for your attention to this matter. If you have any questions, please call me at: 512-637-9477

Sincerely,

Layla Mansuri

ENVIRONMENTAL INTEGRITY PROJECT
On behalf of Environmental Integrity Project, Coalition for a Safe Environment and Communities for a Better Environment

cc (facsimile and certified mail):
Dr. Barry R. Wallerstein, Executive Officer, South Coast Air Quality Management District
Mr. Jeff D. Morris, President and CEO, ALON USA Energy, Inc.
Mr. Jimmy Crosby, Vice President, ALON USA Energy, Inc
Mr. Gerald Rios, USEPA Air Permit Section Chief, Region 9

UNITED STATES
ENVIRONMENAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

IN THE MATTER OF	)	PETITION FOR OBJECTION
Proposed Clean Air Act Title V Operating Permit for Paramount Refinery, Facility ID: 800183	)	Permit No. 339643

Pursuant to section 505(b)(2) of the Clean Air Act ("CAA" or "Act"), 42 U.S.C. § 7661d(b)(2), and 40 C.F.R. § 70.8(d), Environmental Integrity Project, Coalition for a Safe Environment, and Communities for a Better Environment (Petitioners), petition the Administrator of the U.S. Environmental Protection Agency (EPA) to object to the proposed Title V Operating Permit (Permit) issued by the South Coast Air Quality Management District (AQMD) to Paramount Petroleum Company, a wholly owned subsidiary of ALON USA Energy, Inc. (ALON) for operation of the Paramount Refinery in Paramount, California. Pursuant to the Act, Petitioners are providing this Petition to the EPA Administrator, the AQMD, and ALON. Petitioners are also providing this Petition to the EPA Region 9 Air Permit Section Chief.

Environmental Integrity Project (EIP) is a national nonprofit organization dedicated to advocating for more effective enforcement of environmental laws. EIP's ability to carry out its mission of improving the enforcement of environmental laws would be adversely impacted if EPA fails to object to this Permit.

Coalition For A Safe Environment (the Coalition) was established in 2001 for purposes including advocacy on behalf of its members for environmental justice, public health and public

safety involved in international trade ports, goods movement, transportation, and energy and petroleum industry issues. The Coalition has members in over 25 cities in California and in Baja California. The Coalition and its members have an interest in assuring that the Permit contains all federally applicable requirements and monitoring adequate to assure compliance with those requirements. Members of the Coalition will be adversely impacted by the inadequate emission monitoring and testing in the current version of the Permit as well as EPA's failure to object to this Permit.

Communities for a Better Environment (CBE) is a nonprofit environmental health and justice advocacy organization with offices in Oakland and Huntington Park, California. CBE and its members work to secure clean air and reduce pollutant emissions in and near its members' communities. CBE strives to accomplish this by facilitating public participation in administrative decision-making processes, and by ensuring implementation of laws that protect public health and the environment, like the Clean Air Act. CBE has approximately 20,000 members, many of whom live, work, recreate and breathe the air in parts of the Los Angeles metropolitan areas that host disproportionate numbers of pollution sources, including refineries. The Paramount Refinery is located in the Southeast Los Angeles community of Paramount, and impacts the neighboring communities of Compton, Downey, Lynwood and South Gate, as well as Huntington Park. Hundreds of CBE members live, work, and attend school in these Southeast Los Angeles and cities. Residents of these cities are primarily low-income people of color and many speak little or no English. Southeast Los Angeles already bears a disproportionate share of environmental hazards. Residents live surrounded by mobile and stationary pollution sources such as Paramount's refinery, major arterial freeways and railroad tracks, and hundreds of industrial facilities. Pollution from these sources combines to create cumulative adverse health

and environmental impacts. CBE's interests in environmental justice in the Los Angeles area has been, and continues to be, threatened by emissions from the Refinery and failure to take action to adopt a Title V permit for the Refinery that complies with state and federal law.

EPA must object to the proposed Permit because it is not in compliance with the Clean Air Act. Specifically, the proposed Permit fails to require adequate monitoring, does not contain information necessary to determine which emission limits and monitoring requirements apply for each device at the Refinery, and the Permit fails to incorporate post-1997 emission standards.

BACKGROUND

ALON owns and operates the Paramount Refinery (the Refinery), a 54,000 barrel-per-day refinery located on 63 acres in Paramount, California. The Refinery has the capability to process substantial volumes of less expensive sour crude oils, and in industry terms is characterized as a "hydroskimming refinery."[1] The processing and equipment used at the Refinery include naphtha reforming, vacuum distillation, hydrotreating, sulfur recovery, isomerization, flare, and storage tanks. The Paramount Refinery produces gasoline, diesel, jet fuel, LPG, sulfur, and asphalt. The Refinery also utilizes its own terminal to distribute CARB diesel, California Reformulated Gasoline (CaRFG), JP-8 and Jet-A into the local market. *Id.*

[1] According to ALON's annual report, it has plans to expand the Paramount Refinery by adding a naphtha hydrotreater to increase production of distillates and gasoline. ALON anticipates that the naphtha hydrotreater project will be completed in the fourth quarter of 2008. Additionally, ALON has begun the detailed engineering phase that will be required to design and construct a mild hydrocracker at the Paramount Refinery. The construction of a mild hydrocracker will allow ALON to process the remaining unfinished products at Paramount Refinery into distillates and gasoline. ALON anticipates that the hydrocracker project will be completed in the fourth quarter of 2010. *See* ALON USA Energy Inc., Annual Report (Form 10-K), at 8 (March 11, 2008).

On August 29, 2008, AQMD issued an **initial** draft Title V Permit for the Paramount Refinery. On September 3, 2008 AQMD opened a public comment period for the proposed Paramount Refinery Title V Permit. During the public comment period for Paramount Refinery, EIP and the Coalition timely submitted written comments to AQMD on November 4, 2008. All issues in this Petition were raised in the November 4, 2008 comments. *See* Attachment A, Petitioners' November 4, 2008, comments to AQMD.

EPA received the proposed Title V Permit for Paramount Refinery on September 8, 2008. EPA extended its usual 45-day review period based on AQMD Rule 3003(k) (1), which allows EPA to take up to 90 days to review AQMD submissions. The EPA review period ended on November 22, 2008. Even if EPA had not extended its review period, this Petition is timely filed since Petitioners submitted it within 60 days following the end of EPA's usual 45-day review period. *See*, 42 U.S.C. § 7661d(b)(2).

SPECIFIC OBJECTIONS

"If any [Title V] permit contains provisions that are determined by the Administrator as not in compliance with the applicable requirements of this chapter…the Administrator shall…object to its issuance." CAA § 505(b)(1); 42 U.S.C. § 7661d(b)(1) (emphasis added). EPA "does not have discretion whether to object to draft permits once noncompliance has been demonstrated." *See, N.Y. Pub. Interest Group v. Whitman*, 321 F.3d 316, 334 (2nd Cir. 2003) (holding that EPA is required to object to Title V permits once petitioner has demonstrated that permits do not comply with the Clean Air Act).

I. The proposed Permit fails to include monitoring sufficient to assure compliance with emission limits.

The Clean Air Act states that Title V permits must include monitoring requirements sufficient to assure compliance with applicable emission limits and standards. 42 U.S.C. § 7661c(c). On August 19, 2008, the D.C. Circuit Court of Appeals vacated an EPA rule that would have prohibited AQMD and other state authorities from including monitoring requirements in Title V permits if needed to "assure compliance." *Sierra Club, et al., v. EPA*, 536 F.3d 673 (D.C. Cir. 2008). The Court emphasized the statutory duty to include adequate monitoring in Title V permits:

> Title V is a complex statute with a clear objective: it enlists EPA and state and local environmental authorities in a common effort to create a permit program for most stationary sources of air pollution. Fundamental to this scheme is the mandate that "[e]ach permit...shall set forth...monitoring...requirements to assure compliance with the permit terms and conditions." 42 U.S.C. § 7661c(c). By its terms, this mandate means that a monitoring requirement insufficient 'to assure compliance' with emission limits has no place in a permit unless it is supplemented by more rigorous standards." *Id.* at 677.

In addition, the Court acknowledged that the mere existence of periodic monitoring requirements may not be sufficient. *Id.* at 676-677. The court's decision removed any doubt about AQMD's authority to supplement monitoring in Title V permits when needed to "assure compliance" with emission limits.

EPA must object to the proposed Permit until the monitoring provisions are brought into compliance with the Clean Air Act and the D.C. Circuit Court of Appeals' recent opinion. Wherever possible, the Permit should require continuous emission monitoring to measure compliance based on the averaging period in the underlying standard. For example, compliance with an emission limit that has to be met on a daily basis should be measured every day, not once a year. Where continuous monitoring is not available, the Permit should require alternative methods that more closely match monitoring frequency to the averaging time for compliance.

Attachment A to the November 4, 2008 comments provides examples of monitoring methods in the Paramount Refinery draft Title V Permit that do not appear to meet the Title V standard because testing is too infrequent to assure compliance with emission limits. Several of these examples are explained further below.

II. The proposed Permit must require continuous monitoring of particulate matter (PM).

Section D of the proposed Title V Permit limits PM emissions from the crude distillation heaters and steam engine boilers to 0.23 grams of PM per cubic meter of gas calculated to 12% CO_2 at standard conditions, averaged over a minimum of 15 consecutive minutes. AQMD Rule 409, 40 C.F.R § 52.220(b)(32)(iv)(A). There is no monitoring requirement for gaseous/liquid fueled equipment. *Id.* While these heaters and boilers may individually emit a small amount, the Refinery emits a total of 126 tons of PM per year. When combined, heaters and boilers may be a major contributor of these emissions. *See* Paramount Refinery Draft Operating Permit (Facility ID 800183) Statement of Basis, page 16 (August 29, 2008). As the Permit is currently proposed, there is no way to assure compliance with emission limits that must be met on a fifteen-minute basis without continuous monitoring requirements. Considering that the South Coast Air Basin is currently in nonattainment with PM standards, EPA must require continuous PM monitoring for Paramount Refinery. *Id.* at 1.

III. The proposed Permit must require continuous monitoring of carbon monoxide (CO)

Section D of the proposed Title V Permit limits CO emissions from the crude distillation heaters to less than 2000 ppmv averaged over a 15-minute duration. *See* AQMD Rule 407; 40

C.F.R § 52.220(b)(124)(iv)(A). Section D also requires a performance test once every five years to determine compliance with that limit.[2]

Section D of the proposed Title V Permit limits CO emissions from electric generation non-emergency IC engines to 2000 ppmv corrected to 15% oxygen on a dry basis and averaged over 15 minutes. *See* AQMD Rule 1110.2(f)(1)(C)(i); 40 C.F.R § 52.220(b) (121)(i)(C). To monitor emissions from these engines, Section D states that the Refinery must test for CO once every two years, or every 8,760 hours, whichever comes first. *Id.* Relying on annual stack tests—much less one that occurs every two years—is clearly inadequate to assure compliance with emission limits that must be met on a fifteen-minute basis.

IV. The proposed Permit fails to contain clear emission limits and monitoring requirements.

Information necessary to determine which emission limits and monitoring requirements apply to a particular unit is missing from Section D of the proposed Permit. For example, devices D26, D31, D44, D46, D47, D48, D75 and D76 are subject to AQMD Rule 1146. *See* also, 40 C.F.R § 52.220(b)(198)(i)(H)(1). Under Rule 1146, different emission limits and monitoring requirements are based upon two different parameters: mmbtu/hr and therms/yr fuel use. The proposed Permit, however, only identifies emission standards in mmbtu/hr. EPA must object to the proposed Permit because a therms/yr fuel standard is necessary to determine the appropriate monitoring method that will assure compliance with emission limits.

Section D of the proposed Permit contains emissions limits that apply to the Refinery devices. While Petitioners appreciate the effort to cross-reference rule sections throughout

[2] However, where equipment is subject to CO emission limits and requirements of source specific rules in AQMD Regulation XI (e.g. Rule 1146, 1146.1) or no CO emissions are expected, no monitoring is required.

Section D and the Code of Federal Regulations, for future permits, AQMD should specify the emission limits and monitoring methods in the Section D charts. Specifically, these limits should fall under the column "Emissions and Requirements" and "Conditions," so that the public can more easily connect the emissions limits with the equipment releasing the emissions. This would be particularly helpful for high emission devices.

In addition, the proposed Permit should define, with specificity, how emission limits are monitored. Many AQMD rules provide a list of monitoring methods for the Refinery to choose from, yet the Permit does not identify the chosen method. For example, devices D26-D31 are identified as either large or major sources of sulfur oxide (SOx). *See* Paramount Refinery Draft Operating Permit (Facility ID 800183) Section D, pages 3-5 (August 29, 2008). The Permit requires the operator to, "(i)nstall, maintain, and operate an AQMD certified direct or time-shared monitoring device or an approved alternative monitoring device for each major SOx source to continuously measure the concentration of SOx emission or fuel sulfur content." *See* Paramount Refinery Draft Operating Permit (Facility ID 800183) Section F, page 3 (August 29, 2008). The SOx Source Testing Conditions state that this must be done "in compliance with an AQMD-approved source test protocol." *Id.* at 4. If an alternative method is listed, it should be specified in the Permit.

The crude distillation heaters, found in Section D of the Permit, provide another example of unspecified monitoring requirements. *Id.* at 3-5. AQMD Rule 404 provides for maximum allowable emission limits that "var(y) with the exhaust gas flow rate." *See also*, 40 C.F.R § 52.220(b)(169)(i)(A)(1). The monitoring requirements of Rule 404 identify four methods for determining compliance. *Id.* It is unclear whether these methods are alternative options to

choose from or whether each method is a requirement that must be met. The Permit must clearly identify which method or methods are required to assure compliance.

The list of monitoring methods indicates a "requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A." It is not clear whether there is a control device for heaters, as they are not listed under Appendix A. It is also unclear whether this method is a requirement or an option. If it does require venting through a control device, it appears that the Refinery is not in compliance with Rule 404. Again, where the Refinery is allowed to choose between monitoring alternatives, the alternative that is eventually chosen or approved must be clearly identified in the Permit. EPA may not approve the proposed Permit until monitoring methods are clearly identified and assure compliance with emission limits.

V. The proposed Permit fails to incorporate amendments to post-1997 requirements.

The guidelines used by AQMD to develop the proposed Permit do not meet current requirements. AQMD developed *Periodic Monitoring Guidelines* (*Guidelines*) to incorporate periodic monitoring, testing and recordkeeping requirements into Title V permits, but these *Guidelines* are outdated and should be revised.[3] The AQMD appears to rely heavily on this guidance document to ensure that facilities have sufficient monitoring; however, the AQMD has not updated this guidance document since 1997. In light of the recent D.C. Circuit Court of Appeals' decision, EPA must object to the Permit as drafted due to AQMD's use of pre-1997 *Guidelines* as the basis for compliance with current Clean Air Act requirements.

[3] See South Coast AQMD. Title V Periodic Monitoring Guidelines (1997), available at: http://www.aqmd.gov/titlev/pdf/PeriodicMonitoringGuidelines-97.pdf.

VI. The Refinery may be subject to the maximum achievable control technology standards.

MACT requirements apply when the source emits or has the "*potential to emit* 10 tons per year (tpy) of any [hazardous air pollutant (HAP)] or 25 tpy of any combination of HAPs." 40 C.F.R. § 63.2 (emphasis added). The Refinery may be subject to MACT requirements, as it is not clear that this facility does not have the potential to emit 25 tpy of any combination of HAPs.

In addition, the amount of HAPs reported to the AQMD appears to differ significantly from amounts reported to the EPA's Toxic Release Inventory (TRI). *See* Attachment B to the November 4, 2008 comments. While Petitioners recognize the reporting periods are different, the discrepancies are large enough to warrant investigation. Paramount should be required to review HAPs emissions data reported to TRI and South Coast, and correct any discrepancies. *Id.*

In 2004, the Paramount Refinery was issued a Notice of Violation of AQMD Rule 203(b) and 2004(f)(1) for failing to install leakless seal valves on certain pieces of equipment. *See* Paramount Refinery Draft Operating Permit (Facility ID 800183) Statement of Basis, page 20 (August 29, 2008). While the Refinery reported total emissions of 26,526 lbs/yr of HAPs, the actual emissions may be much higher. Failing to comply with AQMD's rules, combined with the age of the Paramount Refinery, may have put the Refinery over the threshold for MACT applicability. If so, the Permit must incorporate applicable MACT standards. EPA must object to the Permit until the quantity of HAPs can be confirmed, and MACT status evaluated.

CONCLUSION

The proposed Paramount Refinery Title V Permit does not comply with the Clean Air Act. The Permit fails to require adequate emissions monitoring for several pollutants including PM and CO, fails to contain information necessary to determine which emission limits and

monitoring requirements apply for each device and relies on outdated guidance. Without these measures, Title V's purpose of increasing enforcement and compliance will be defeated. Title V aims to improve accountability and enforcement by "clarify[ing], in a single document, which requirements apply to a source." 57 Fed. Reg. 32250, 32251 (July 21, 1992). The proposed Permit fails to reach this aim.

For the foregoing reasons, Petitioners respectfully request that the Administrator timely object to proposed Permit No. 339643 and require the South Coast Air Quality Management District to revise the proposed Permit in accordance with the Act.

Respectfully submitted,

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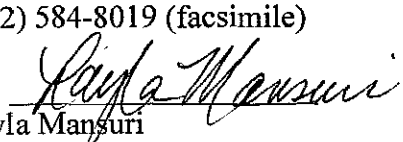
By: 
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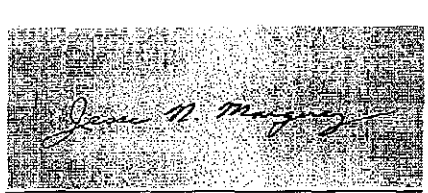
By: 
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By: __/s/_____
Shana Lazerow, Staff Attorney
Email: slazerow@cbecal.org

DATED: December 17, 2008

CERTIFICATE OF SERVICE

I declare under penalty of perjury under the laws of the United States that I have provided copies of the foregoing Petition to persons or entities below on December 17, 2008 as specified:

VIA FACSIMILE AND CERTIFIED MAIL
Administrator Stephen L. Johnson
U.S. Environmental Protection Agency
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VIA FACSIMILE AND CERTIFIED MAIL
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VIA FACSIMILE AND CERTIFIED MAIL
U.S. Environmental Protection Agency
Attn: Air Permit Section Chief
Region 9
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Layla Mansuri

Attachment A

NOVEMBER 4, 2008 COMMENTS ON THE PROPOSED TITLE V PERMIT FOR PARAMOUNT REFINERY (FACILITY ID: 800183)

ENVIRONMENTAL INTEGRITY PROJECT

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November 4, 2008

VIA CERTIFIED MAIL, EMAIL, and FAX
Mr. Jay Chen
South Coast Air Quality Management District
Engineering and Compliance
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Email: jchen@aqmd.gov

RE: Comments on the Draft Operating Permit for the Paramount Refinery
Facility ID: 800183 (14700 Downey Avenue, Paramount, CA 90723)

Dear Mr. Chen,

Environmental Integrity Project (EIP), People's Community Organization for Reform and Empowerment (People's CORE), and Coalition for a Safe Environment (CFASE) (collectively, Commenters) appreciate the opportunity to comment on the draft operating permit for the Paramount Petroleum Corporation's Refinery (Refinery). EIP is a national non-profit organization that advocates for more effective enforcement of environmental law. People's CORE and CFASE are non-profit environmental research and advocacy organizations with members in the immediate vicinity of, and directly affected by, the Refinery.

The D.C. Circuit Court of Appeals recently confirmed that Title V permits must include monitoring sufficient to assure compliance with emission limits.

The Clean Air Act states that Title V permits must include monitoring requirements sufficient to assure compliance with applicable emission limits and standards.[1] On August 19, 2008, the D.C. Circuit Court of Appeals struck down a USEPA rule that would have prohibited AQMD and other state and local authorities from including monitoring requirements in Title V permits if

[1] 42 U.S.C.A. §7661c(c).

needed to "assure compliance."[2] The court emphasized the statutory duty to include adequate monitoring in Title V permits:

> "By its terms, this mandate means that a monitoring requirement insufficient 'to assure compliance' with emission limits has no place in a permit unless it is supplemented by more rigorous standards."[3]

According to the court, the mere existence of "periodic monitoring" requirements may not be sufficient.[4] The court's decision removed any doubt about AQMD's authority to supplement monitoring in Title V permits when needed to "assure compliance" with emission limits.

AQMD should review the Title V monitoring provisions to ensure that each provision is in compliance with the Clean Air Act and the D.C. Circuit Court of Appeals' recent opinion. Wherever possible, the permit should require continuous emission monitoring to measure compliance based on the averaging period in the underlying standard. For example, compliance with an emission limit that has to be met on a daily basis should be measured every day, not once a year. Where continuous monitoring is not available, the permit should require alternative methods that more closely match monitoring frequency to the averaging time for compliance.

Attachment A provides examples of monitoring methods in the Refinery draft Title V permit that do not appear to meet the Title V standard because testing is too infrequent to assure compliance with emission limits. Several of these examples are explained further in the discussion below.

AQMD must require continuous monitoring of particulate matter (PM) from the Refinery, particularly from the Crude Distillation Heaters and Steam Generation Boilers.

Section D of the Title V permit limits PM emissions from the Crude Distillation Heaters and Steam Engine Boilers to 0.23 gram PM per cubic meter of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes.[5] There is no monitoring requirement for gaseous/liquid fueled equipment.[6] While these heaters and boilers may individually emit a small amount, the Refinery emits a total of 126 tons of PM per year. Heaters and boilers may be a major contributor of these emissions when combined.[7] There is no way to assure compliance with emission limits that must be met on a fifteen-minute basis without any monitoring requirements. Considering that the South Coast Air Basin is currently in serious nonattainment with PM standards, AQMD should require continuous PM monitoring for the Refinery.[8]

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[2] *Sierra Club, et al., v. EPA*, No. 04-1243, slip op., (D.C. Cir., August 19, 2008).
[3] Id, at 9.
[4] Id, at 6.
[5] AQMD Rule 409, 8-7-198.
[6] Id.
[7] Title V Permit, Statement of Basis, 16.
[8] Id. at 1.

AQMD must require continuous monitoring of carbon monoxide (CO) from the Refinery, particularly from the Crude Distillation Heaters and Electric Generation Non-Emergency IC Engines.

Section D of the Title V permit limits CO emissions from the Crude Distillation Heaters to less than 2000 ppmv averaged over a 15-minute duration.[9] Section D also requires a performance test once every five years to determine compliance with that limit. However, where equipment is subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1) or no CO emissions are expected, no monitoring is required.[10]

Additionally, Section D of the Title V permit limits CO emissions from Electric Generation Non-Emergency IC Engines to 2000 PPMV corrected to 15% oxygen on a dry basis and averaged over 15 minutes.[11] To monitor emissions from these engines, Section D states that the Refinery must test for CO once every two years, or every 8,760 hours, whichever comes first.[12] Relying on annual stack tests—much less one that occurs every two years—is clearly inadequate to assure compliance with emission limits that must be met on a fifteen-minute basis.

Information necessary to determine which emission limits and monitoring requirements apply for each device should be included in the Title V permit and easy to find.

Some information necessary to determine which emission limits and monitoring requirements a unit is subject to appears to be missing from Section D of the Title V Permit, which indicates that devices D26, D31, D44, D46, D47, D48, D75 and D76 are subject to Rule 1146, 11-17-2000. Under Rule 1146, the "Equipment Category" column indicates different emission limits and monitoring requirements based upon two different parameters: mmbtu/hr and therms/yr fuel use. The Refinery permit identifies an emission standard in mmbtu/hr, but does not identify the therms/yr fuel standard applicable. The therms/yr fuel standard is required to determine the appropriate monitoring method the Refinery must use to comply with emission limits.

AQMD should update the Periodic Monitoring Guidelines to incorporate amendments to emission standards and limits made after 1997.

AQMD developed the Periodic Monitoring Guidelines to incorporate periodic monitoring, testing and recordkeeping requirements into Title V permits, but these Guidelines are outdated and should be revised.[13] The AQMD appears to rely heavily on this guidance document to ensure that facilities have sufficient monitoring; however, the AQMD has not updated this guidance document since 1997. In light of the recent D.C. Circuit Court of Appeals' decision, these Guidelines should be reviewed and updated.

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[9] AQMD Rule 407, 4-2-198.
[10] Id.
[11] AQMD Rule 1110.2(f)(1)(C)(i), 2-1-2008.
[12] Id.
[13] http://www.aqmd.gov/titlev/requirements.html#pm.

To avoid confusion, the Refinery permit should contain clear emission limits and monitoring requirements.

The permit needs to define, with specificity, how the Refinery will monitor emission limits. Many of the AQMD rules provide a list of monitoring methods for the Refinery to choose from, yet do not identify the method chosen in the permit. For example, devices D26-D31 are identified as either large or major sources of sulfur oxide (SOx).[14] The Monitoring Conditions require the operator to, "(i)nstall, maintain, and operate an AQMD certified direct or time-shared monitoring device or an approved alternative monitoring device for each major SOx source to continuously measure the concentration of SOx emission or fuel sulfur content."[15] The SOx Source Testing Conditions state that this must be done "in compliance with an AQMD-approved source test protocol."[16] If an alternative method is listed, it should be specified in the permit.

The Crude Distillation Heaters, found in Section D of the Title V Permit, provide another example of vague monitoring requirements that should be reexamined.[17] AQMD Rule 404 provides for maximum allowable emission limits that "var(y) with the exhaust gas flow rate."[18] The monitoring requirements of Rule 404 identify four methods for determining compliance.[19] It is unclear whether these methods are alternative options to choose from or whether each method is a requirement that must be met. The permit needs to clearly identify which method or methods are required to assure compliance.

The list of monitoring methods indicates a "requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A." It is not clear whether there is a control device for heaters, as they are not listed under Appendix A. It is also unclear whether this method is a requirement or an option. If it does require venting through a control device, it appears that the Refinery is not in compliance with Rule 404. Where the Refinery is allowed to choose between monitoring alternatives, the alternative that is eventually chosen or approved should be identified in the permit. Greater clarity should be provided in the Refinery permit in order to prevent confusion and increase the likelihood of compliance.

The Refinery may be subject to MACT requirements.

MACT requirements apply when the source emits or has the "*potential to emit* 10 tons per year (tpy) of any [hazardous air pollutant (HAP)] or 25 tpy of any combination of HAPs."[20] The Refinery may be subject to MACT requirements, as it is not clear that this facility does not have the potential to emit 25 tpy of any combination of HAPs.

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[14] Title V Permit, Section D, p. 3-5
[15] Title V Permit, Section F, p. 3.
[16] Title V Permit, Section F, p. 4.
[17] Title V Permit, Section F, p. 3-5.
[18] AQMD Rule 404, 2-7-1986.
[19] Id.
[20] 40 C.F.R. § 63.2 (emphasis added).

In addition, the amount of HAPs reported to the AQMD appears to differ significantly from amounts reported to the USEPA's Toxic Release Inventory (TRI).[21] While we recognize the reporting periods are different, the discrepancies are large enough to warrant investigation. Paramount should be required to review HAPs emissions data reported to TRI and South Coast, and correct any discrepancies.[22]

In 2004, the Refinery was issued a Notice of Violation of AQMD Rule 203(b) and 2004(f)(1) for failing to install leakless seal valves on certain pieces of equipment.[23] While the Refinery has reported a total emission of 26,526 lbs/yr of total HAPs, the actual emissions may be much higher. Failing to comply with AQMD's rules, combined with the age of the refinery, may have put the Refinery over the threshold for MACT applicability. If so, the Refinery should be subject to MACT requirements.

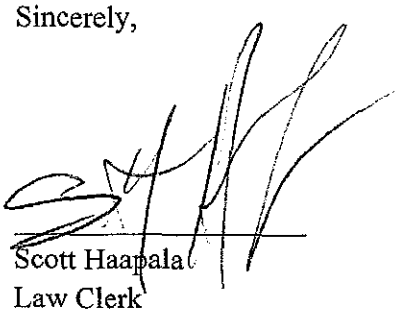
AQMD should re-organize Title V permits to clearly identify emissions limits.

Section D of the permit currently contains emissions limits that apply to the devices within the Refinery. While EIP appreciates the effort to cross-reference rule sections throughout Section D and the Code of Federal Regulations, for future permits, AQMD should specify the emission limits and monitoring methods in the Section D charts. Specifically, these limits should fall under the column "Emissions and Requirements" and "Conditions," so that the public can more easily connect the emissions limits with the equipment releasing the emissions. This would be particularly helpful for high emission devices. Please see Attachment A as an example.

Thank you for the opportunity to comment on the proposed Title V permit for the Paramount Petroleum Corporation Refinery.

[21] See Attachment B.
[22] Id.
[23] Title V Permit, Statement of Basis, 20.

Sincerely,



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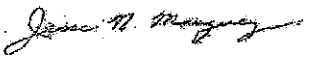

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ATTACHMENT A

	A	B	C
2	DEVICE	EMISSIONS/ REQUIREMENTS	MONITORING/ COMPLIANCE
3	CRUDE DISTILLATION: HEATERS: D26:PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] 0.23 gram PM per cubic meter of gas, calculated to 12 percent CO2 at standard conditions, 15 minute average.	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment. [Rule 409,8-7-1981]
4	29.7 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986]	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
5	CRUDE DISTILLATION: HEATERS: D26:CO	2000 ppmv (5A) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
6		400 ppmv (5) (Rule 1146, 11-17-2000) need to know how much therms/yr fuel use	need to know how much therms/yr fuel use
7	CRUDE DISTILLATION :HEATERS :D26 :NOX	38.475 PPMV (3) [RULE 2012, 5-6-2005] Concentration limit or equipment-specific emission rate. Facility emissions cap. [Regulation XX: Rule 2012(d)(1)]	Fuel meter and applicable parameters described in Appendix A, Chapter 3, Table 3-A or equivalent. Test every three years to determine continuous compliance with the concentration limit or equipment-specific emission rate.
8			
9	CRUDE DISTILLATION: HEATERS: D29:PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] No discharges exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
10	53.5 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986]	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
11	CRUDE DISTILLATION: HEATERS: D29: CO	2000 ppmv (5) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
12			
13	CRUDE DISTILLATION: HEATERS: D30:PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] No discharges exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
14	50.5 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986]	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
15	CRUDE DISTILLATION: HEATERS: D30: CO	2000 ppmv (5) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
16			
17	CRUDE DISTILLATION: HEATERS: D31:PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] No discharges exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
18	27.2 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986]	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
19	CRUDE DISTILLATION: HEATERS: D31:CO	2000 ppmv (5A) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
20		400 ppmv (5) (Rule 1146, 11-17-2000) need to know how much therms/yr fuel use	need to know how much therms/yr fuel use
21	CRUDE DISTILLATION :HEATERS :D31 :NOX	38.475 PPMV (3) [RULE 2012, 5-6-2005] Concentration limit or equipment-specific emission rate. Facility emissions cap. [Regulation XX: Rule 2012(d)(1)]	Fuel meter and applicable parameters described in Appendix A, Chapter 3, Table 3-A or equivalent. Test every three years to determine continuous compliance with the concentration limit or equipment-specific emission rate.
22			
23	HYDROTREATING: HEATERS: D44: PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] No discharges exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
24	29 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986]	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
25	HYDROTREATING: HEATERS: D44: CO	2000 ppmv (5A) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
26		400 ppmv (5) (Rule 1146, 11-17-2000) need to know how much therms/yr fuel use	need to know how much therms/yr fuel use
27	HYDROTREATING: HEATERS: D44: NOX	38.475 PPMV (3) [RULE 2012, 5-6-2005] Concentration limit or equipment-specific emission rate. Facility emissions cap. [Regulation XX: Rule 2012(d)(1)]	Fuel meter and applicable parameters described in Appendix A, Chapter 3, Table 3-A or equivalent. Test every three years to determine continuous compliance with the concentration limit or equipment-specific emission rate.
28			

	A	B	C
29	HYDROTREATING: HEATERS: D46: PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] No discharges exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
30	28 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986)	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
31	HYDROTREATING: HEATERS: D46: CO	2000 ppmv (5A) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
32		400 ppmv (5) (Rule 1146, 11-17-2000) need to know how much therms/yr fuel use	need to know how much therms/yr fuel use
33	HYDROTREATING: HEATERS: D46: NOX	38.475 PPMV (3) [RULE 2012, 5-6-2005] Concentration limit or equipment-specific emission rate. Facility emissions cap. [Regulation XX: Rule 2012(d)(1)]	Fuel meter and applicable parameters described in Appendix A, Chapter 3, Table 3-A or equivalent. Test every three years to determine continuous compliance with the concentration limit or equipment-specific emission rate.
34			
35	HYDROTREATING: HEATERS: D47: PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] No discharges exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
36	30 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986)	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
37	HYDROTREATING HEATERS: D47: CO	2000 ppmv (5A) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
38		400 ppmv (5) (Rule 1146, 11-17-2000) need to know how much therms/yr fuel use	need to know how much therms/yr fuel use
39	HYDROTREATING: HEATERS: D47: NOX	38.475 PPMV (3) [RULE 2012, 5-6-2005] Concentration limit or equipment-specific emission rate. Facility emissions cap. [Regulation XX: Rule 2012(d)(1)]	Fuel meter and applicable parameters described in Appendix A, Chapter 3, Table 3-A or equivalent. Test every three years to determine continuous compliance with the concentration limit or equipment-specific emission rate.
40			
41	HYDROTREATING: HEATERS: D48: PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] No discharges exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
42	27.6 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986)	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
43	HYDROTREATING: HEATERS: D48: CO	2000 ppmv (5A) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
44		400 ppmv (5) (Rule 1146, 11-17-2000) need to know how much therms/yr fuel use	need to know how much therms/yr fuel use
45	HYDROTREATING: HEATERS: D48: NOX	38.475 PPMV (3) [RULE 2012, 5-6-2005] Concentration limit or equipment-specific emission rate. Facility emissions cap. [Regulation XX: Rule 2012(d)(1)]	Fuel meter and applicable parameters described in Appendix A, Chapter 3, Table 3-A or equivalent. Test every three years to determine continuous compliance with the concentration limit or equipment-specific emission rate.
46			
47	CATALYTIC REFORMING: HEATERS: D73: PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] No discharges exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
48	48 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986)	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
49	CATALYTIC REFORMING: HEATERS: D73: CO	2000 ppmv (5A) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
50			
51	CATALYTIC REFORMING: HEATERS: D74: PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] No discharges exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
52	48 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986)	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
53	CATALYTIC REFORMING: HEATERS: D74: CO	2000 ppmv (5A) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
54			
55	CATALYTIC REFORMING: HEATERS: D75: PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] No discharges exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
56	38.43 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986)	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.

	A	B	C
57	CATALYTIC REFORMING: HEATERS: D75: CO	2000 ppmv (5A) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
58		400 ppmv (5) (Rule 1146, 11-17-2000) need to know how much therms/yr fuel use	need to know how much therms/yr fuel use
59			
60	CATALYTIC REFORMING: HEATERS: D76: PM	0.1Grains/SCF (5) [Rule 409,8-7-1981] No discharges exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12% of CO2 at standard conditions averaged over a minimum of 15 consecutive minutes	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
61	38.43 mmbtu/hr	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986]	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
62	CATALYTIC REFORMING: HEATERS: D76: CO	2000 ppmv (5A) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
63		400 ppmv (5) (Rule 1146, 11-17-2000) need to know how much therms/yr fuel use	need to know how much therms/yr fuel use
64			
65	CATALYTIC REFORMING: SELECTIVE CATALYTIC REDUCTION: C77: NH3	20PPMV (5) RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002	D73, D74, D75 and D76 all flow into this device and they all are major sources of NOX and SOX, yet have no emissions/requirements. Neither does this device. Why? Also, the construction permit states that the NH3 emission limit is 18ppmv, yet the operating permit states that it is 20ppmv. Why
66			
67	ASPHALT PRODUCTION: ASPHALT OXIDIZING UNIT NO.1: D80: PM	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986]	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
68		(9) 0.45 to 13.60 kilogram solid PM per hour (emission limit determined from process weight per hour (Rule 405, 2-7-1986)	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
69		0.6 kilogram per megagram (8) (40CFR63 Subpart UU, 8-5-1983)	
70			
71	ASPHALT PRODUCTION: ASPHALT OXIDIZING UNIT NO.2: D85: PM	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986]	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
72		(9) 0.45 to 13.60 kilogram solid PM per hour (emission limit determined from process weight per hour (Rule 405, 2-7-1986)	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
73		0.6 kilogram per megagram (8) (40CFR63 Subpart UU, 8-5-1983)	
74			
75	ASPHALT PRODUCTION: ASPHALT OXIDIZING UNIT NO.3: D87: PM	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986]	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
76		(9) 0.45 to 13.60 kilogram solid PM per hour (emission limit determined from process weight per hour (Rule 405, 2-7-1986)	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
77		0.6 kilogram per megagram (8) (40CFR63 Subpart UU, 8-5-1983)	
78			
79	ASPHALT PRODUCTION: ASPHALT OXIDIZING UNIT NO.4: D89: PM	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986]	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
80		(9) 0.45 to 13.60 kilogram solid PM per hour (emission limit determined from process weight per hour (Rule 405, 2-7-1986)	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
81		0.6 kilogram per megagram (8) (40CFR63 Subpart UU, 8-5-1983)	
82			
83	TREATING/STRIPPING: LIGHT NAPHTHA MEROX TREATER: D161: SOX	500 PPMV (5)]RULE 407, 4-2-1982] ≤ 500 ppmv SO2, dry basis, averaged over 15 minutes duration	None for equipment where SOX emissions are not expected; or subject to SOx emission limits and requirements of source specific rules in Regulation XI ; Other equipment: AQMD-approved portable CO analyzer once every 5 years.
84	TREATING/STRIPPING: HEAVY NAPHTHA MEROX TREATER: D161: SOX	500 PPMV (5)]RULE 407, 4-2-1982] ≤ 500 ppmv SO2, dry basis, averaged over 15 minutes duration	None for equipment where SOX emissions are not expected; or subject to SOx emission limits and requirements of source specific rules in Regulation XI ; Other equipment: AQMD-approved portable CO analyzer once every 5 years.
85	TREATING/STRIPPING: CAUSTIC STORAGE&SCRUBBING: C167: SOX	500 PPMV, dry basis, averaged over 15 minutes duration (5) [RULE 407, 4-2-1982]	None for equipment where SOX emissions are not expected; or subject to SOx emission limits and requirements of source specific rules in Regulation XI ; Other equipment: AQMD-approved portable CO analyzer once every 5 years.
86			

	A	B	C
87	TREATING/STRIPPING: CAUSTIC STORAGE&SCRUBBING: D168: SOX	500 PPMV, dry basis, averaged over 15 minutes duration (5) [RULE 407, 4-2-1982]	None for equipment where SOX emissions are not expected; or subject to SOx emission limits and requirements of source specific rules in Regulation XI ; Other equipment: AQMD-approved portable CO analyzer once every 5 years.
88			
89	SULFUR RECOVERY UNIT: SULFUR RECOVERY UNIT NO.2: D172: H2S	10 PPMV (5) [RULE 468, 10-8-1976]	CEMS installed and operated per 40 CFR 60 Appendix B & F to measure H2S; OR control device monitoring per Appendix A, AND measure H2S daily with AQMD-approved portable analyzer (or detection tube if AQMD-approved portable analyzer is not commercially available), and performance test once every 5 years in accordance with AQMD Method 307-91, or parametric monitoring correlated with a performance test
90	SULFUR RECOVERY UNIT: SULFUR RECOVERY UNIT NO.2: D172: SOX	500 PPMV, dry basis, averaged over 15 minutes duration (5) [RULE 407, 4-2-1982]	None for equipment where SOX emissions are not expected; or subject to SOx emission limits and requirements of source specific rules in Regulation XI ; Other equipment: AQMD-approved portable CO analyzer once every 5 years.
91	SULFUR RECOVERY UNIT: SULFUR RECOVERY UNIT NO.2: D647: H2S	10 PPMV (5) RULE [468, 10-8-1976]	CEMS installed and operated per 40 CFR 60 Appendix B & F to measure H2S; OR control device monitoring per Appendix A, AND measure H2S daily with AQMD-approved portable analyzer (or detection tube if AQMD-approved portable analyzer is not commercially available), and performance test once every 5 years in accordance with AQMD Method 307-91, or parametric monitoring correlated with a performance test
92	SULFUR RECOVERY UNIT: SULFUR RECOVERY UNIT NO.2: D647: SOX	500 PPMV, dry basis, averaged over 15 minutes duration (5) [RULE 407, 4-2-1982]	None for equipment where SOX emissions are not expected; or subject to SOx emission limits and requirements of source specific rules in Regulation XI ; Other equipment: AQMD-approved portable CO analyzer once every 5 years.
93	SULFUR RECOVERY UNIT: TAIL GAS INCINERATOR: C175: PM	0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981] 0.23 gram PM per cubic meter of gas, calculated to 12% CO2 at standard conditions, 15 minute average	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
94		23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) [Rule 404,2-7-1986]	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A.
95	SULFUR RECOVERY UNIT: TAIL GAS INCINERATOR: C175: CO	2000 ppmv (5) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
96			
97	ELECTRIC GENERATION: NON-EMERGENCY IC ENGINES: D370: CO	2000 PPMV by volume, corrected to 15% oxygen on a dry basis and averaged over 15 minutes. (5) [RULE 1110.2, 2-1-2008]	at least once every two years, or every 8,760 operating hours, whichever occurs first.
98	ELECTRIC GENERATION: NON-EMERGENCY IC ENGINES: D370: NOX	102 LBS/1000GAL (1) [RULE 2012, 5-6-2005] No equipment-specific emission limit. May have equipment-specific or category-specific emission rate. Facility emissions cap. [Regulation XX: 2012(e)(1)]	Fuel meter and/or timer, or equivalent.
99	ELECTRIC GENERATION: NON-EMERGENCY IC ENGINES: D370: PM	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) RULE 404, 2-7-1986	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
100	ELECTRIC GENERATION: NON-EMERGENCY IC ENGINES: D370: SOX	5.3 LBS/1000 GAL (1) [RULE 2011, 5-6-2005] No equipment-specific emission limit. Facility emissions cap. [Regulation XX: 2011(d)(1)]	Fuel meter and/or timer, or equivalent.
101	ELECTRIC GENERATION: NON-EMERGENCY IC ENGINES: D370: VOC	250 PPMV , measured as carbon, corrected to 15% oxygen on a dry basis and averaged over the sampling time required by the test method. (5) [RULE 1110.2, 2-4-2008]	at least once every two years, or every 8,760 operating hours, whichever occurs first.
102			
103	ELECTRIC GENERATION: NON-EMERGENCY IC ENGINES: D371: NOX	3400 LBS/MMSCF (1) [RULE 2012, 5-6-2005] No equipment-specific emission limit. May have equipment-specific or category-specific emission rate. Facility emissions cap. [Regulation XX: 2012(e)(1)]	Fuel meter and/or timer, or equivalent.
104	ELECTRIC GENERATION: NON-EMERGENCY IC ENGINES: D371: PM	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) RULE 404, 2-7-1986	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
105			
106	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D551: NOX	469 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005] No equipment-specific emission limit. May have equipment-specific or category-specific emission rate. Facility emissions cap. [Regulation XX: 2012(e)(1)]	Fuel meter, and/or timer, or equivalent.
107		6.9 GRAM/BHP-HR (4) [RULE 2005, 5-6-2005]	
108	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D551: PM	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) RULE 404, 2-7-1986	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
109	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D551: PM10	0.38 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) BACT, 12-6-2002]	
110	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D551: ROG	1 GRAM/BHP-HR (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1) BACT, 12-6-2002]	

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111	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D551: SOX	6.24 LBS/1000 GAL DIESEL (1) [RULE 2011, 5-6-2005] No equipment-specific emission limit. Facility emissions cap. [Regulation XX: 2011(d)(1)]	Fuel meter, and/or timer, or equivalent.
112			
113	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D651: NOX	469 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005] No equipment-specific emission limit. May have equipment-specific or category-specific emission rate. Facility emissions cap. [Regulation XX: 2012(e)(1)]	Fuel meter, and/or timer, or equivalent.
114		6.9 GRAM/BHP-HR (4) [RULE 2005, 5-6-2005]	
115	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D651: PM	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) RULE 404, 2-7-1986	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
116	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D651: SOX	6.24 LBS/1000 GAL DIESEL (1) [RULE 2011, 5-6-2005] No equipment-specific emission limit. Facility emissions cap. [Regulation XX: 2011(d)(1)]	Fuel meter, and/or timer, or equivalent.
117			
118	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D652: NOX	469 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005] No equipment-specific emission limit. May have equipment-specific or category-specific emission rate. Facility emissions cap. [Regulation XX: 2012(e)(1)]	Fuel meter, and/or timer, or equivalent.
119		6.9 GRAM/BHP-HR (4) [RULE 2005, 5-6-2005]	
120	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D652: PM	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) RULE 404, 2-7-1986	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
121	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D652: SOX	6.24 LBS/1000 GAL DIESEL (1) [RULE 2011, 5-6-2005] No equipment-specific emission limit. Facility emissions cap. [Regulation XX: 2011(d)(1)]	Fuel meter, and/or timer, or equivalent.
122			
123	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D676: NOX	469 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005] No equipment-specific emission limit. May have equipment-specific or category-specific emission rate. Facility emissions cap. [Regulation XX: 2012(e)(1)]	Fuel meter, and/or timer, or equivalent.
124		6.9 GRAM/BHP-HR (4) [RULE 2005, 5-6-2005]	
125	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D676: PM	23-450mg PM per dry, standard cubic meter of gas (maximum allowable emission limit varies with the exhaust gas flow rate) (9) RULE 404, 2-7-1986	No Monitoring: Gap-Filling: All sources: Compliance with this rule is determined through the following: Engineering calculation by the use of appropriate emission factors; Equipment limitation; Process throughput limit and recordkeeping; Requirement to vent the equipment to a control device meeting the monitoring requirements in Appendix A
126	ELECTRIC GENERATION: EMERGENCY IC ENGINES: D676: SOX	6.24 LBS/1000 GAL DIESEL (1) [RULE 2011, 5-6-2005] No equipment-specific emission limit. Facility emissions cap. [Regulation XX: 2011(d)(1)]	Fuel meter, and/or timer, or equivalent.
127			
128			
129	STEAM GENERATION: BOILERS: D373: CO	2000 ppmv (5) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	D328.2: The operator shall determine compliance with CO emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100:1 or 10:1; or (b) conducting a test at least annually using a portable analyzer and AQMD approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with the CO concentration
130	STEAM GENERATION: BOILERS: D373: PM	0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981] 0.23 gram PM per cubic meter of gas, calculated to 12% CO2 at standard conditions, 15 minute average	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
131	44.5 mmbtu/hr		D328.1: The operator shall determine compliance with CO emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100:1 or 10:1; or (b) conducting a test at least annually using a portable analyzer and AQMD approved test method.
132	STEAM GENERATION: BOILERS: D374: CO	2000 ppmv (5) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years
133	STEAM GENERATION: BOILERS: D374: PM	0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981] 0.23 gram PM per cubic meter of gas, calculated to 12% CO2 at standard conditions, 15 minute average	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
134	44.5 mmbtu/hr		D328.2: The operator shall determine compliance with CO emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100:1 or 10:1; or (b) conducting a test at least annually using a portable analyzer and AQMD approved test method.
135	STEAM GENERATION: BOILERS: D375: CO	2000 ppmv (5) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
136	STEAM GENERATION: BOILERS: D375: PM	0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981] 0.23 gram PM per cubic meter of gas, calculated to 12% CO2 at standard conditions, 15 minute average	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
137	44.5 mmbtu/hr		D328.2: The operator shall determine compliance with CO emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100:1 or 10:1; or (b) conducting a test at least annually using a portable analyzer and AQMD approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with the CO concentration
138	STEAM GENERATION: BOILERS: D376: CO	2000 ppmv (5) (Rule 407, 4-2-1982) ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years
139	STEAM GENERATION: BOILERS: D376: PM	0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981] 0.23 gram PM per cubic meter of gas, calculated to 12% CO2 at standard conditions, 15 minute average	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.
140	65.9 mmbtu/hr		

	A	B	C
141	AIR POLLUTION CONTROL: REFINERY FLARE SYSTEM: C396: CO	2000 ppmv (5) [Rule 407, 4-2-1982] ≤ 2,000 ppmv CO, dry basis, averaged over 15 minutes duration	None for equipment where CO emissions are not expected; or subject to CO emission limits and requirements of source specific rules in Regulation XI (e.g. Rule 1146, 1146.1); Other equipment: AQMD-approved portable CO analyzer once every 5 years.
142	AIR POLLUTION CONTROL: REFINERY FLARE SYSTEM: C396: PM	0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981] 0.23 gram PM per cubic meter of gas, calculated to 12% CO2 at standard conditions, 15 minute average	No Monitoring: Gap-Filling Monitoring: None for gaseous/liquid fueled equipment. Performance test once every 5 yrs or parametric monitoring correlated with a performance test for solid fuel-fired equipment.

ATTACHMENT B

PARAMOUNT Refinery (Facility ID No. 800183)	Annual Reported Emissions for Reporting Year 2006-2007 (lbs/yr) from Draft Title V Statement of Basis	2007 Emissions (lbs/yr) Reported in EPA's Toxic Release Inventory	2006 Emissions (lbs/yr) Reported in EPA's Toxic Release Iinventory
Toxic Air Contaminants			
1, 2, 4-Trimethylbenzene	8.8	0	0
1, 3 - Butadiene	1.6	0	0
2-Methyl Napthalene [PAH, POM]	0.13	0	0
Acetaldehyde	1666	0	0
Acrolein	1446	0	0
Ammonia	22771	17911	13491
Arsenic	0.01	0	0
Benzene	3344	1454	1681
Cadmium	0.9	0	0
Copper	0.03	0	0
Diesel engine exhaust, particulate matter	239	0	0
Ethylbenzene	55	79	89.64
Formaldehyde	6831	0	0
Hexane	1338	0	0
Hexachlorocyclohexanes	324	0	0
Hydrochloric acid	1.3	0	0
Lead (inorganic)	0.06	0	0
Manganese	0.02	0	0
Mercury	0.01	0	0
Methanol	0.03	0	0
Napthalene	3.4	19.73	0
Nickel	0.7	0	0
PAHs, total, with components not reported	59	0	0
Polycyclic Aromatic Compounds	0	7.55	8.36
Selenium	0.2	0	0
Styrene	0.6	0	0
Toluene	1004	1718	1908
Trichloroethylene	24	0	0
Xylenes	10573	270	310