URS

DOCKET
09-AFC-1
DATE MAR 02 2010
RECD. MAR 09 2010

March 2, 2010

Dockets Unit
California Energy Commission
1516 Ninth Street, MS 4
Sacramento, CA 95814-5512

Re: Watson Cogeneration Steam and Electric Reliability Project
Application for Certification 09-AFC-1

On behalf of Watson Cogeneration Company, the applicant for the above-referenced Watson Cogeneration Steam and Electric Reliability Project, we are pleased to submit the following air permit application modifications that were recently submitted to South Coast Air Quality Management District (SCAQMD):

- Application for Change of Condition to Watson Cogeneration Units 1-4 (Watson Cogeneration Steam and Electric Reliability Project); and

- Addendum Application for Using Aqueous Ammonia in Watson Cogeneration Steam and Electric Reliability Project, A/Ns 496922, 496924, and 496925.

These permit application modifications were prepared and submitted at the request of SCAQMD.

These documents are being submitted to the CEC for docketing.

Sincerely,
URS Corporation

Cindy Kyle-Fischer
Project Manager

Enclosures

cc: Proof of Service List

URS Corporation
8181 East Tufts Avenue
Denver, CO 80237
Tel: 303.694.2770
Fax: 303.694.3946

BP West Coast Products LLC
BP Carson Refinery
2350 E. 223rd Street
Mailing Address: Box 6210
Carson, California 90749-6210
United States of America

Telephone: +1 (310) 816-8100

February 24, 2010

South Coast Air Quality Management District
Attn: Permit Processing
21865 Copley Drive
Diamond Bar, CA 91765-4182

Subject: **Addendum Application for Using Aqueous Ammonia in Watson Cogeneration Steam and Electric Reliability Project, A/Ns 496922, 496924, and 496925.**

Reference: **Watson Cogeneration Company, Electric Generation (Process 17), BP Carson Refinery, Facility ID 131003**

Dear Sir/Madam:

Enclosed, please find the addendum permit applications for using aqueous ammonia on the proposed new cogeneration unit in the Watson Cogeneration Steam and Electric Reliability Project. A check in the amount of $2,051.52, based on Rule 301 application fees, is enclosed for the aqueous ammonia tank. Please note that application fee for the attached Form 400-E-5 (SCR System, Oxidation Catalyst, and Ammonia Catalyst) was submitted previously, and therefore, no additional fee is required.

Please note that permit application forms 500-A2 and 500-C1 were submitted previously as part of pending application numbers 496922, 496924 and 496925 and have not been re-submitted as part of this permit application package. Additionally, please note that, per the directive from Jay Chen (SCAQMD; Senior Manager), Forms 500-C2 are not to be submitted with each individual permit application package. Rather, up to date Forms 500-C2 will be submitted to the SCAQMD, as requested, and immediately prior to each re-issuance of the Title V permit. No Forms 500-C2 are submitted with this current permit application package.

Please call me at (310) 847-5652 if you have any questions or comments regarding the enclosed package.

Sincerely,

John Shao
Environmental Project Engineer

Enclosures

cc: BP Env. File 06A01-0046391 (with attachment)
Ross Metersky – BP (with attachment)
Tom Lu – Watson Cogeneration Company (with attachment)

ecc: ECC 2010-02-24 AQMD Addendum Permit for Using Aqueous Ammonia in Watson Cogeneration Steam and Electric Reliability Project (cover letter only)
Eric Daley – BP (cover letter only)
Alan Seese – BP (cover letter only)
Scott Hawley – Watson Cogeneration Company (cover letter only)

Watson Cogeneration Company

046901

DATE	INVOICE NO		DISCOUNTMOUNT	NET AMOUNT
02/17/10	STORAGE-T	2,051.52	.00	2,051.52

CHECK: 046901 02/22/10 So.Coast Air Quality Mgmt Dist CHK TOTAL: 2,051.52

WCC-6000-A (1-91)

THE FACE OF THIS CHECK HAS A COLORED BACKGROUND – NOT A WHITE BACKGROUND

Watson Cogeneration Company
22850 South Wilmington Avenue
Carson, California 90745-6203

Citibank Delaware
A SUBSIDIARY OF CITICORP
ONE PENN'S WAY
NEW CASTLE, DE 19720

046901 62-20/311

Check No. 046901

Date 02/22/10

Amount *****2,051.52*

*TWO THOUSAND FIFTY ONE DOLLARS AND 52 CENTS

Pay to the order of

So.Coast Air Quality Mgmt Dist
21865 Copley Drive
Diamond Bar CA 91765-4182

Authorized Signature

Authorized Signature

⑈046901⑈ ⑆031100209⑆ 38553567⑈

South Coast Air Quality Management District

Form 400-A

Application For Permit To Construct and Permit To Operate

Mail Application To:
P.O. Box 4944
Diamond Bar, CA 91765

Tel: (909) 396-3385
www.aqmd.gov

Section A: Operator Information

1. Business Name of Operator To Appear On The Permit:
BP West Coast Products LLC-BP Carson Refinery

2. Valid AQMD Facility ID (Available on Permit or Invoice issued by AQMD): 131003

3. Owner's Business Name (only if different from Business Name of Operator):
Watson Cogeneration Company

Section B: Equipment Location

4. Equipment Location Address:
For equipment operated at various locations in AQMD's jurisdiction, provide address of initial site

2350 E. 223rd Street
Street Address

Carson — CA, — 90810
City — State — Zip Code

County: (•) Los Angeles ( ) Orange ( ) San Bernardino ( ) Riverside

Contact Name: John Shao

Contact Title: Environmental Engineer — Phone: (310) 847-5652

Fax: (310) 847-5780 — E-Mail: john.shao@bp.com

Section C: Permit Mailing Address

5. Permit and Correspondence Information:
[ ] Check here if same as equipment location address

Carson One Campus, PO Box 6210
Street Address

Carson — CA — 90749
City — State — Zip Code

Contact Name: John Shao

Contact Title: Environmental Engineer — Phone: (310) 847-5652

Fax: (310) 847-5780 — E-Mail: john.shao@bp.com

Section D: Application Type

The facility is in ( ) RECLAIM ( ) Title V (•) RECLAIM & Title V Program (please check if applicable)

6. Reason for Submitting Application (Select only ONE):

- (•) New Construction (Permit to Construct)
- ( ) Equipment Operating Without A Permit or Expired Permit*
- ( ) Administrative Change
- ( ) Equipment On-Site But Not Constructed or Operational
- ( ) Title V Application (Initial, Revisions, etc.)
- ( ) Compliance Plan
- ( ) Facility Permit Amendment
- ( ) Registration/Certification
- ( ) Streamlined Standard Permit
- ( ) Permitted Equipment Altered/ Modified Without Permit Approval*
- ( ) Proposed Alteration/Modification to Permitted Equipment
- ( ) Change of Condition For Permit To Operate
- ( ) Change of Condition For Permit To Construct
- ( ) Change of Location—Moving to New Site

Existing Or Previous Permit/Application Number:
(If you checked any of the items in this column, you MUST provide a existing Permit/ Application Number)

* A Higher Permit Processing Fee applies to those items with an asterisk (Rule 301 (c) (1) (D)

7. Estimated Start Date of Operation/Construction (MM/DD/YYYY):

8. Description of Equipment:
Aqueous ammonia tank for SCR system for unit #5
(see supplemental tank form)

9. Is this equipment portable AND will it be operated at different locations within AQMD's jurisdiction? (•) No ( ) Yes

10. For Identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each) 0

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are $500,000 or less, or a not-for-profit training center?) (•) No ( ) Yes

12. Has a Notice of Violation (NOV) or a Notice To Comply (NC) been issued for this equipment?
(•) No ( ) Yes If yes, provide NOV/NC #:

Section E: Facility Business Information

13. What type of business is being conducted at this equipment location?
Petroleum refining

14. What is your businesses primary NAICS Code (North American Industrial Classification System)? 324110

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? ( ) No (•) Yes

16. Are there any schools (K-12) within a 1000-ft. radius of the equipment physical location? (•) No ( ) Yes

Section F: Authorization/Signature

I hereby certify that all information contained herein and information submitted with this application is true and correct.

17. Signature of Responsible Official:

18. Title:
Environmental Manager

19. Print Name:
Alan Seese

20. Date:
02/24/10

Check List
- [X] Form(s) signed and dated by authorized official
- [X] Supplemental Equipment Form (400-E-XX or 400-E-GEN)
- [X] CEQA Form (400-CEQA) attached
- [X] Payment for permit processing fee attached

Your application will be rejected if any of the above items are missing.

AQMD USE ONLY	APPLICATION/TRACKING #	TYPE B C D	EQUIPMENT CATEGORY CODE:	FEE SCHEDULE: $	VALIDATION
ENG. A R DATE	ENG. A R DATE	CLASS I III IV	ASSIGNMENT Unit Engineer	CHECK/MONEY ORDER #	AMOUNT $	Tracking #

South Coast Air Quality Management District

FORM 400-E-18
STORAGE TANK

Mail Application To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765
Tel: (909) 396-3385
www.aqmd.gov

This form must be accompanied by a completed Application for a Permit to Construct/Operate -Form 400A, Form CEQA, Plot Plan and Stack Form

Permit to be issued to (Business name of operator to appear on permit):
BP West Coast Products LLC-BP Carson Refinery

Address where the equipment will be operated (for equipment which will be moved to various location in AQMD's jurisdiction, please list the initial location site):
2350 E. 223rd Street, Carson, CA. 90810 (●) Fixed Location ( ) Various Locations

Tank Type (Select ONE)
( ) External Floating Roof Tank (EFRT) ( ) Internal Floating Roof Tank (IFRT) (●) Horizontal Tank (HT)
( ) Vertical Fixed Roof Tank (VFRT) ( ) Domed External Roof Tank (DEFRT)

Identification
Tank Identification Number:
Tank Contents/Product (include MSDS): Aqueous ammonia 30% solution

SECTION A: TANK INFORMATION

Physical Characteristics

Tank Characteristics

Shell Diameter (ft):	Shell Length (ft):	Shell Height (ft):	Turnovers Per Year:
7.00	44.88		

Is Tank Heated? ( ) Yes (●) No
Is Tank Underground? ( ) Yes (●) No
Net Throughput (gal/year):
Self Support Roof ( ) Yes ( ) No
Number of Columns?
Effective Column Diameter: ( ) 9" by 7" Built Up Column – 1.1 ( ) 8" Diameter Pipe – 0.7 ( ) Unknown
External Shell Condition: ( ) Good ( ) Poor
Internal Shell Color: ( ) Light Rust ( ) Dense Rust ( ) Gunite Lining
External Shell Color: ( ) White/White ( ) Aluminum/Specular ( ) Aluminum/Diffuse ( ) Gray/Light ( ) Gray/Medium ( ) Red/Primer
Average Liquid Height (ft): (VERT Only)
Maximum Liquid Height (ft): (VERT Only)
Working Volume (gal): (VERT Only)
Paint Condition: ( ) Good ( ) Poor
Paint Color/Shade: ( ) White/White ( ) Aluminum/Diffuse ( ) Gray/Light ( ) Aluminum/Specular ( ) Gray/Medium ( ) Red/Primer

Roof Characteristics (Floating Roof Tank)

Roof Type: ( ) Pontoon ( ) Dome Roof (Height ____ ft.) ( ) Double Deck ( ) Cone Roof (Height ____ ft.)
Roof Fitting Category: ( ) Typical ( ) Detail
Roof Height:
Roof Paint Condition: ( ) Good ( ) Poor
Roof Color/Shade: ( ) White/White ( ) Aluminum/Diffuse ( ) Gray/Light ( ) Aluminum/Specular ( ) Gray/Medium ( ) Red/Primer

Deck Characteristics (Floating Roof Tank)

Deck Type: ( ) Welded ( ) Bolted
Deck Fitting Characteristics: ( ) Typical ( ) Detailed (Complete Deck Seam)

Construction:	Deck Seam Length (ft):	Deck Seam:
( ) Sheet		( ) 5 ft. wide ( ) 6 ft. wide ( ) 7 ft. wide
( ) Panel		( ) 5 x 7.5 ft. ( ) 5 x 12 ft.

Tank Construction and Rim-Seal System (Floating Roof Tank)

Tank Construction: ( ) Welded ( ) Riveted
Primary Seal: ( ) Mechanical Shoe ( ) Liquid Mounted ( ) Vapor Mounted
Secondary Seal: ( ) Rim Mounted ( ) None ( ) Shoe Mounted

Breather Vent Setting

Vacuum Setting (psig): 30.000
Pressure Setting (psig): 30.000

*Section C of the application MUST be completed.

SECTION A: TANK INFORMATION (Cont.)

Site Selection

Nearest Major City: Carson

Daily Average Ambient Temperature (°F):	Annual Average Minimum Temperature (°F):
Annual Average Maximum Temperature (°F):	Average Wind Speed (mph):

Annual Average Solar Insulation Factor (Btu/(ft² * ft * day)):

Tank Contents

Chemical Category
- ○ Organic Liquids ○ Crude Oil
- ○ Petroleum Distillates

Liquid
- ◉ Single
- ○ Multiple:

If Multiple, Select Speciation Option:
- ○ Full Speciation ○ Partial Speciation
- ○ Various Weight Speciation ○ None

SECTION B: OPERATION INFORMATION

Vapor Control

Vapor Control During Loading or Unloading:
- ☐ Sparger ☐ Vapor Balance System ☒ Vapor Return Line
- ☐ Vented to Air Pollution Control Equipment:

If yes, a separate permit is required. If APC equipment is already permitted, provide Permit or Device Number: N/A

Vent Valve Data

Indicate Type of Setting and Vapor Disposal

	Number	Pressure Setting	Vaccum Setting	Discarging to (Check Appropriate Box) Atmosphere	Vapor Control	Flare
Combination				☐	☐	☐
Pressure				☐	☐	☐
Vaccum				☐	☐	☐
Open				☐	☐	☐

Materials

Name all liquids, vapors, gases, or mixtures of such material to be stored in this tank:
Aqueous ammonia, 30% solution, 12000 gal tank

If Material is stored in a solution, supply the following information:
Name of Solvent: water
Name of Materials Dissolved: ammonia

Concentration of Materials Dissolved: 30.00 % by Weight OR _____ % by Volume OR _____ lbs/gal

SECTION C: ROOF/DECK FITTING

Section C is required for the following tanks: External Floating Roof Tank, Internal Floating Roof Tank, or Domed External Floating Roof Tank.

Select the number of fittings for each applicable question. For Example: 3 Unbolted Cover, Ungasketed / Unbolted Cover, Gasketed

Roof/Deck Fitting Details

1. Access Hatch (24" diameter well)
   - ____ Bolted Cover, Gasketed
   - ____ Unbolted Cover, Ungasketed
   - ____ Unbolted Cover, Gasketed
2. Automatic Gauge Float Well (20" diameter well)
   - ____ Bolted Cover, Gasketed
   - ____ Unbolted Cover, Ungasketed
   - ____ Unbolted Cover, Gasketed
3. Column Well (24" diameter well)
   - ____ Built-Up Col – Sliding Cover, Gasketed
   - ____ Built-Up Col – Sliding Cover, Ungasketed
   - ____ Pipe Col – Flex. Fabric Sleeve Seal
   - ____ Pipe Col – Sliding Cover, Gasketed
   - ____ Pipe Col. – Sliding Cover, Ungasketed

Roof/Deck Fitting Details (Cont.)

4. Gauge Hatch/Sample Well (8" diameter well)

- ____ Weighted Mechanical Actuation, Gasketed
- ____ Weighted Mechanical Actuation, Ungasketed

5. Ladder Well (36" diameter)

- ____ Sliding Cover, Gasketed
- ____ Sliding Cover, Ungasketed

6. Rim Vent (6" diameter)

- ____ Weighted Mechanical Actuation, Gasketed
- ____ Weighted Mechanical Actuation, Ungasketed

7. Roof Drain (3" diameter)

- ____ Open
- ____ 90% Close

8. Roof Leg (3" diameter leg)

- ____ Adjustable, Pontoon Area, Ungasketed
- ____ Adjustable, Center Area, Ungasketed
- ____ Adjustable, Double-Deck Roofs
- ____ Fixed
- ____ Adjustable, Pontoon Area, Gasketed
- ____ Adjustable, Pontoon Area, Sock
- ____ Adjustable, Center Area, Gasketed
- ____ Adjustable, Center Area, Sock

9. Roof Leg or Hang Well

- ____ Adjustable
- ____ Fixed

10. Sample Pipe (24" diameter)

- ____ Slotted Pipe – Sliding Cover, Gasketed
- ____ Slotted Pipe – Sliding Cover, Ungasketed
- ____ Slit Fabric Seal, 10% Open

11. Guided Pole/Sample Well

- ____ Ungasketed, Sliding Cover, Without Float
- ____ Ungasketed Sliding Cover, With Float
- ____ Gasketed Sliding Cover, Without Float
- ____ Gasketed Sliding Cover, With Float
- ____ Gasketed Sliding Cover, With Pole Sleeve
- ____ Gasketed Sliding Cover, With Pole Wiper
- ____ Gasketed Sliding Cover, With Float, Wiper
- ____ Gasketed Sliding Cover, With Float, Sleeve, Wiper
- ____ Gasketed Sliding Cover, With Pole Sleeve, Wiper

12. ____ **Stub Drain** (1" diameter)

13. Unslotted Guide – Pole Well

- ____ Ungasketed, Sliding Cover
- ____ Gasketed Sliding Cover
- ____ Ungasketed Sliding Cover with Sleeve
- ____ Gasketed Sliding Cover with Sleeve
- ____ Gasketed Sliding Cover with Wiper

14. Vacuum Breaker (10" diameter well)

- ____ Weighted Mechanical Actuation, Gasketed
- ____ Weighted Mechanical Actuation, Ungasketed

SECTION D: APPLICANT CERTIFICATION STATEMENT

I hereby certify that all information contained herein and information submitted with this application is true and correct.

SIGNATURE OF PREPARER:	TITLE OF PREPARER:	PREPARER'S TELEPHONE NUMBER: (805) 569-6555
	Gregory Darvin	PREPARER'S E-MAIL ADDRESS: darvin@atmosphericdynamic

CONTACT PERSON FOR INFORMATION ON THIS EQUIPMENT:	CONTACT PERSON'S	DATE SIGNED:
John Shao	TELEPHONE NUMBER: (310) 847-5652	
E-MAIL ADDRESS: john.shao@bp.com	FAX NUMBER: (310) 847-5780	02/16/2010

CONFIDENTIAL INFORMATION

Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to a third party. If you wish to keep certain items as confidential, please complete the following steps:

(a) Make a copy of any page containing confidential information blanked out. Label this page "public copy."
(b) Label the original page "confidential." Circle all confidential items on the page.
(c) Prepare a written justification for the confidentiality of each confidential item. Append this to the confidential copy.

South Coast Air Quality Management District

FORM 400-E-5
SELECTIVE CATALYTIC REDUCTION (SCR) SYSTEM, OXIDATION CATALYST, AND AMMONIA CATALYST

Mail Application To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765

Tel: (909) 396-3385
www.aqmd.gov

This form must be accompanied by a completed Application for a Permit to Construct/Operate -Form 400A, Form CEQA, Plot Plan and Stack Form

Permit to be issued to (Business name of operator to appear on permit):
BP West Coast Products LLC- BP Carson Refinery

Address where the equipment will be operated (for equipment which will be moved to various location in AQMD's jurisdiction, please list the initial location site):
2350 E. 223rd Street, Carson, Ca. 90810 (●) Fixed Location ( ) Various Locations

SECTION A: EQUIPMENT INFORMATION

SELECTIVE CATALYTIC REDUCTION (SCR)

SCR Catalyst

Manufacturer: TBD
Catalyst Active Material: TBD: V, Tu, etc.
Model Number: TBD
Type: TBD (plate or honeycomb)
Size of Each Layer or Module: Length: 1 ft. 8.50 in. Width: 25 ft. in. Height: 38 ft. in.
No. of Layers or Modules: 1 Total Volume: 1583.330 cu.ft. Total Weight: 65000.00 lbs.

Reducing Agent

( ) Urea ( ) Anhydrous Ammonia (●) Aqueous Ammonia 30.00 % Injection Rate: lb/hr.

Reducing Agent Storage

Diameter: 7 ft. in. Height: 44 ft. 11.00 in. Capacity: 12000.0 gal Pressure Setting: 30.000 psia

Space Velocity

Gas Flow Rate/Catalyst Volume: 72000.0 hr^{-1}

Area Velocity

Gas Flow Rate/Wetted Catalyst Surface Area: 175.00 ft/hr

Manufacturer's Guarantee

NOx: 2.000 ppm $\%O_2$: 15.00 NOx: gm/bhp-hr Ammonia Slip: 5.000 ppm @ 15.00 $\%O_2$

Catalyst Life

3 years (expected)

Cost

Capital Cost: Installation Cost: Catalyst Replacement Cost:

OXIDATION CATALYST

Oxidation Catalyst

Manufacturer: TBD
Catalyst Active Material: TBD: V, Tu, etc.
Model Number: TBD
Type: TBD (plate or honeycomb)
Size of Each Layer or Module: Length: 1 ft. 8.000 in. Width: 25 ft. in. Height: 38 ft. in.
No. of Layers or Modules: 1 Total Volume: 1583.330 cu.ft. Total Weight: 65000.00 lbs.

Space Velocity

Gas flow rate/Catalyst Volume: 72000.0 hr^{-1}

Manufacturer's Guarantee

VOC 2.000 ppm VOC gm/bhp-hr CO 4.000 ppm CO gm/bhp-hr
$\%O_2$ 15.00 $\%O_2$ 15.00

Catalyst Life

3 years (expected)

Cost

Capital Cost: Installation Cost: Catalyst Replacement Cost:

AMMONIA CATALYST		
Ammonia Catalyst	Manufacturer: n/a	Catalyst Active Material:
	Model Number:	Type:
	Size of Each Layer or Module: Length: ft. in. Width: ft. in. Height: ft. in. No. of Layers or Modules: Total Volume: cu.ft. Total Weight: lbs.	
Space Velocity	Gas flow rate/Catalyst Volume: hr^{-1}	
Manufacturer's Guarantee	NH3 ppm % O_2	
Catalyst Life	years (expected)	
Cost	Capital Cost: Installation Cost: Catalyst Replacement Cost:	

SECTION B: OPERATION INFORMATION

Operating Temperature	Minimum Inlet Temperature: 680.00 °F (from cold start)	Maximum Temperature: 800.00 °F
	Warm-up Time: 3 hr. min. (maximum)	
Operating Schedule	Normal: 24 hours/day 7 days/week 52 weeks/yr.	
	Maximum: 24 hours/day 7 days/week 52 weeks/yr.	

SECTION C: APPLICANT CERTIFICATION STATEMENT

I hereby certify that all information contained herein and information submitted with this application is true and correct.

SIGNATURE OF PREPARER:	TITLE OF PREPARER: Consultant	PREPARER'S TELEPHONE NUMBER: (805) 569-6555 PREPARER'S E-MAIL ADDRESS: darvin@atmosphericdynamic
CONTACT PERSON FOR INFORMATION ON THIS EQUIPMENT: John Shao E-MAIL ADDRESS: john.shao@bp.com	CONTACT PERSON'S TELEPHONE NUMBER: (310) 847-5652 FAX NUMBER: (310) 847-5780	DATE SIGNED: 02/16/2010

CONFIDENTIAL INFORMATION

Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to a third party. If you wish to keep certain items as confidential, please complete the following steps:

(a) Make a copy of any page containing confidential information blanked out. Label this page "public copy."
(b) Label the original page "confidential." Circle all confidential items on the page.
(c) Prepare a written justification for the confidentiality of each confidential item. Append this to the confidential copy.

ATTACHMENT A

PERMIT APPLICATION FEE CALCULATIONS

PERMIT APPLICATION FEE FOR:	**Carson Steam Project _ Aqueous Ammonia Tank**
BP File Number:	**6A01-0046391**
BP Project Engineer:	**John Shao**

Device	Device ID	Previous A/N	Process ID	System ID	Schedule	Schedule Description	Application Purpose	Base Application Fee	Apply Identical Unit Fee Discount?	Penalty For Operating Without A Permit?	Apply Expedite Fee?	Total Application Fees
Aqueous Ammonia Storage Tank	N/A	N/A	17	X	B	Storage Tank, Ammonia		$2,051.52	No	No	No	**$ 2,051.52**

Subtotal:	$2,051.52
RECLAIM & Title V Permit Amendment Fee:	$0.00
Total Fees:	**$2,051.52**

Note 1: Based on Rule 301 as amended June 5, 2009
Note 2: "Total Application Fees" are rounded to the nearest penny for each device in accordance with SCAQMD guidelines.
Note 3: RECLAIM/Title V Permit Amendment Fee was already provided with A/Ns 496922, 496924 and 496925.

BP West Coast Products LLC
BP Carson Refinery
2350 E. 223rd Street
Mailing Address: Box 6210
Carson, California 90749-6210
United States of America

Telephone: +1 (310) 816-8100

February 24, 2010

South Coast Air Quality Management District
Attn: Permit Processing
21865 Copley Drive
Diamond Bar, CA 91765-4182

Subject: **Application for Change of Condition to Watson Cogeneration Units 1-4 (Watson Cogeneration Steam and Electric Reliability Project)**

Reference: **Watson Cogeneration Company at the BP Carson Refinery (Facility ID 131003; Process 17, Systems 1-4)**

Dear Sir/Madam:

Enclosed, please find permit applications for Change of Condition to the Watson Cogeneration Units 1-4 (Process 17, Systems 1-4) of the BP Carson Refinery permit (Facility ID 131003). These applications are submitted as part of the Watson Cogeneration Steam and Electric Reliability Project (SCAQMD permit application numbers 496922, 496924 and 496925) and will be used to replace permit references indicating "common to cogeneration units 1,2,3,& 4" with "common to all cogeneration systems" as well as allowing the application of a common PM-10 emissions limit. A check in the amount of $27,355.19, based on Rule 301 application fees, is enclosed along with the supporting documentation necessary for completing this permit review.

Please note that permit application forms 500-A2 and 500-C1 were submitted previously as part of pending application numbers 496922, 496924 and 496925 and have not been re-submitted as part of this permit application package. Additionally, please note that, per the directive from Jay Chen (SCAQMD; Senior Manager), Forms 500-C2 are not to be submitted with each individual permit application package. Rather, up to date Forms 500-C2 will be submitted to the SCAQMD, as requested, and immediately prior to each re-issuance of the Title V permit. No Forms 500-C2 are submitted with this current permit application package.

Also included with this permit application submittal is a request to remove the No. 4 Steam Plant (Process 18, System 1) from the permit; the SCAQMD form necessary to request this change (form titled "Request to Inactivate a Permit to Operate") has been included in this permit application package.

Please call me at (310) 847-5652 if you have any questions or comments regarding the enclosed package.

Sincerely,

John Shao
Environmental Project Engineer

Enclosures

cc: BP Env. File 06A01-0046391 (with attachment)
Ross Metersky – BP (with attachment)
Tom Lu – Watson Cogeneration Company (with attachment)

ecc: ECC 2010-02-18 AQMD Permit for Change of Condition in Existing 4 Trains for Watson Cogeneration Steam and Electric Reliability Project (cover letter only)
Eric Daley – BP (cover letter only)
Alan Seese – BP (cover letter only)
Scott Hawley – Watson Cogeneration Company (cover letter only)

Watson Cogeneration Company 046902

DATE	INVOICE NO		DISCOUNTMOUNT	NET AMOUNT
02/17/10	6A01004639	27,355.19	.00	27,355.19

CHECK: 046902 02/22/10 So.Coast Air Quality Mgmt Dist CHK TOTAL: 27,355.19

WCC-6000-A (1-91)

THE FACE OF THIS CHECK HAS A COLORED BACKGROUND – NOT A WHITE BACKGROUND

Watson Cogeneration Company
22850 South Wilmington Avenue
Carson, California 90745-6203

Citibank Delaware
A SUBSIDIARY OF CITICORP
ONE PENN'S WAY
NEW CASTLE, DE 19720

046902 62-20/311

Check No. 046902

Date 02/22/10

Amount

*TWENTY SEVEN THOUSAND THREE HUNDRED FIFTY FIVE DOLLARS AND 19 ****27,355.19*

Pay to the order of

So.Coast Air Quality Mgmt Dist
21865 Copley Drive
Diamond Bar CA 91765-4182

Authorized Signature

Authorized Signature

⑈046902⑈ ⑆031100209⑆ 3855356 7⑈

South Coast Air Quality Management District
P. O. Box 4944
Diamond Bar, CA 91765
Attn: Permit Services - Data Entry

REQUEST TO INACTIVATE A PERMIT TO OPERATE

PERMIT ISSUED TO:

1. Current Facility ID: 131003
2. Company Name: BP West Coast Products LLC BP Carson Refinery
3. Company Address: 2350 East 223rd Street, Carson, CA 90810
4. Permit Number: 435241 Date Issued: Unk.
5. Equipment Description: Process 18, System 1; Number 4 Steam Plant (No. 42 boiler and associated equipment).

Reason for Inactivation:

Cancellation of the Permit to Operate described above is hereby requested for the following reason(s). Check all that apply:

- ☐ Equipment ○ **Sold** ○ **Destroyed** or ○ **Removed** from premises. Effective Date: _____
- ☐ Equipment was replaced with (New Permit Number):
- ☒ Equipment will no longer be used. Date of disconnection: Unknown; historic occurrence
- ☐ Equipment is exempt form permit requirements by AQMD Rule 219.
- ☐ Business & Equipment Sold. Effective Date: _____

  Name and Address of new owner:

- ☐ Other (explain):

It is understood that any future use of this equipment may require a new permit application in accordance with the laws then in effect.

Required Signatures:

Signature of Responsible Official of Organization	Environmental Manager Title
Alan Seese Printed Name of Responsible Official of Organization	02/19/16 Date
Signature of AQMD Inspector (Optional)	Date

Rev. 2007.02

South Coast Air Quality Management District

Form 400-A

Application For Permit To Construct and Permit To Operate

Mail Application To:
P.O. Box 4944
Diamond Bar, CA 91765

Tel: (909) 396-3385
www.aqmd.gov

Section A: Operator Information

1. Business Name of Operator To Appear On The Permit:
BP West Coast Products LLC – BP Carson Refinery

2. Valid AQMD Facility ID (Available on Permit or Invoice issued by AQMD): 131003

3. Owner's Business Name (only if different from Business Name of Operator):
Watson Cogeneration Company

Section B: Equipment Location

4. Equipment Location Address:
For equipment operated at various locations in AQMD's jurisdiction, provide address of initial site

2350 E. 223rd Street
Street Address

Carson — CA, — 90810 –
City — State — Zip Code

County: (•) Los Angeles ( ) Orange ( ) San Bernardino ( ) Riverside

Contact Name: John Shao

Contact Title: Environmental Project Engr. Phone: (310) 847-5652

Fax: (310) 847-5780 E-Mail: john.shao@bp.com

Section C: Permit Mailing Address

5. Permit and Correspondence Information:
☐ Check here if same as equipment location address

P.O. Box 6210
Street Address

Carson — CA, — 90749 – 6210
City — State — Zip Code

Contact Name: John Shao

Contact Title: Environmental Project Engr. Phone: (310) 847-5652

Fax: (310) 847-5780 E-Mail: john.shao@bp.com

Section D: Application Type

The facility is in ( ) RECLAIM ( ) Title V (•) RECLAIM & Title V Program (please check if applicable)

6. Reason for Submitting Application (Select only ONE):

- ( ) New Construction (Permit to Construct)
- ( ) Equipment Operating Without A Permit or Expired Permit*
- ( ) Administrative Change
- ( ) Equipment On-Site But Not Constructed or Operational
- ( ) Title V Application (Initial, Revisions, etc.)
- ( ) Compliance Plan
- ( ) Facility Permit Amendment
- ( ) Registration/Certification
- ( ) Streamlined Standard Permit
- ( ) Permitted Equipment Altered/ Modified Without Permit Approval*
- ( ) Proposed Alteration/Modification to Permitted Equipment
- (•) Change of Condition For Permit To Operate
- ( ) Change of Condition For Permit To Construct
- ( ) Change of Location—Moving to New Site

Existing Or Previous Permit/Application Number:
(If you checked any of the items in this column, you MUST provide a existing Permit/ Application Number)
411168

* A Higher Permit Processing Fee applies to those items with an asterisk (Rule 301 (c) (1) (D)

7. Estimated Start Date of Operation/Construction (MM/DD/YYYY): 02/01/2010

8. Description of Equipment:
Process 17, System 1 (Cogeneration Unit No. 1)

9. Is this equipment portable AND will it be operated at different locations within AQMD's jurisdiction? (•) No ( ) Yes

10. For Identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each) 3

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are $500,000 or less, or a not-for-profit training center?) (•) No ( ) Yes

12. Has a Notice of Violation (NOV) or a Notice To Comply (NC) been issued for this equipment?
(•) No ( ) Yes If yes, provide NOV/NC #:

Section E: Facility Business Information

13. What type of business is being conducted at this equipment location?
Petroleum Refining

14. What is your businesses primary NAICS Code (North American Industrial Classification System)? 324110

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? ( ) No (•) Yes

16. Are there any schools (K-12) within a 1000-ft. radius of the equipment physical location? (•) No ( ) Yes

Section F: Authorization/Signature

I hereby certify that all information contained herein and information submitted with this application is true and correct.

17. Signature of Responsible Official:

18. Title:
Environmental Manager

19. Print Name:
Alan Seese

20. Date:
02/19/10

Check List
- [x] Form(s) signed and dated by authorized official
- [x] Supplemental Equipment Form (400-E-XX or 400-E-GEN)
- [x] CEQA Form (400-CEQA) attached
- [x] Payment for permit processing fee attached

Your application will be rejected if any of the above items are missing.

AQMD USE ONLY	APPLICATION/TRACKING #	TYPE B C D	EQUIPMENT CATEGORY CODE:	FEE SCHEDULE: $	VALIDATION

ENG. A R DATE	ENG. A R DATE	CLASS I III IV	ASSIGNMENT Unit Engineer	CHECK/MONEY ORDER #	AMOUNT $	Tracking #

South Coast Air Quality Management District

FORM 400-E-12
GAS TURBINE

Mail Application To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765

Tel: (909) 396-3385
www.aqmd.gov

This form must be accompanied by a completed Application for a Permit to Construct/Operate -Form 400A, Form CEQA, Plot Plan and Stack Form

Permit to be issued to (Business name of operator to appear on permit):
BP West Coast Products LLC - BP Carson Refinery

Address where the equipment will be operated (for equipment which will be moved to various location in AQMD's jurisdiction, please list the initial location site):
2350 E. 223rd Street, Carson, CA 90810 ◉ Fixed Location ○ Various Locations

SECTION A: EQUIPMENT INFORMATION

Turbine (NO CHANGE)

Manufacturer: General Electric

Model No.: PG7111EA

Serial No.:

Size (based on Higher Heating Value - HHV):

Manufacturer Maximum Input Rating: _____ MMBTU/hr _____ kWh

Manufacturer Maximum Output Rating: _____ MMBTU/hr _____ kWh

Function (Check all that apply) (NO CHANGE)

☒ Electrical Generation ☐ Driving Pump/Compressor ☐ Emergency Peaking Unit
☒ Steam Generation ☐ Exhaust Gas Recovery ☐ Other (specify): _____

Cycle Type (NO CHANGE)

○ Simple Cycle ○ Regenerative Cycle
◉ Combined Cycle ○ Other (specify): _____

Combustion Type (NO CHANGE)

○ Tubular ◉ Can-Annular ○ Annular

Fuel (Turbine) (NO CHANGE)

◉ Natural Gas ○ LPG ○ Digester Gas*
○ Landfill Gas* ○ Propane ◉ Refinery Gas* ◉ Other*: Butane

* (If Digester Gas, Landfill Gas, Refinery Gas, and/or Other are checked, attach fuel analysis indicating higher heating value and sulfur content).

Heat Recovery Steam Generator (HRSG) (NO CHANGE)

Steam Turbine Capacity _____ MW

Low Pressure Steam Output Capacity: _____ lb/hr @ _____ °F

High Pressure Steam Output Capacity: _____ lb/hr @ _____ °F

Superheated Steam Output Capacity: _____ lb/hr @ _____ °F

Duct Burner (NO CHANGE)

Manufacturer: John Zink

Model:

Number of burners:

Rating of each burner (HHV):

Type: ○ Low NOx (please attach manufacturer's specifications) ○ Other: _____

Show all heat transfer surface locations with the HRSG and temperature profile

Fuel (Duct Burner) (NO CHANGE)

◉ Natural Gas ○ LPG ○ Digester Gas*
◉ Refinery Gas* ○ Landfill Gas* ○ Propane ○ Other*: _____

*(If Digester Gas, Landfill Gas, Refinery Gas, and/or Other are checked, attach fuel analysis indicating higher heating value and sulfur content).

Air Pollution Control
(NO CHANGE)

- (●) Selective Catalytic Reduction (SCR)*
- ( ) Selective Non-catalytic Reduction (SNCR)*
- (●) Oxidation Catalyst*
- ( ) Other (specify)* _____
- (●) Steam/Water Injection:
  Injection Rate: _____ lbs. water/lbs. fuel, or _____ mole water/mole fuel

* Separate application is required.

Capital Cost:	Installation Cost:	Annual Operating Cost:

Oxidation Catalyst Data (If Applicable)
(NO CHANGE)

Manufacturer: _____ Model: _____

Catalyst Dimensions: Length: _____ ft. _____ in. Width: _____ ft. _____ in. Height: _____ ft. _____ in.

Catalyst Cell Density: _____ cells/sq. in. Pressure Drop Across Catalyst: _____

Manufacturer's Guarantee — CO Control Efficiency: _____ % Catalyst Life: _____ yrs.
VOC Control Efficiency: _____ % Operating Temp. Range: _____ °F

Space Velocity (gas flow rate/catalyst volume): _____ Area Velocity (gas flow/wetted catalyst surface area): _____

VOC Concentration into Catalyst: _____ PPMVD @ 15 % O_2 CO Concentration into Catalyst: _____ PPMVD @ 15 % O_2

SECTION B: OPERATION INFORMATION

On-line Emissions Data
(NO CHANGE)

Pollutants	Maximum Emissions Before Control*		Maximum Emissions After Control	
	PPM@15% O_2 dry	lb/Hour	PPM@15% O_2 dry	lb/Hour
ROG				
NOx				
CO				
PM10				
SOx				
NH3				

* Based on temperature, fuel consumption, and MW output

Reference (attach data):
☐ Manufacturer Emission Data ☐ EPA Emission Factors ☐ AQMD Emission Factors ☐ Source Test

Stack or Vent Data
(NO CHANGE)

Stack Height: _____ ft. _____ in. Stack Diameter: _____ ft. _____ in.
Exhaust Temperature: _____ °F Exhaust Pressure: _____ inches water column
Exhaust Flow Rate: _____ CFM Oxygen Level: _____ %

Operating Schedule
(NO CHANGE)

Normal: 24 hours/day 7 days/week 52 weeks/yr
Maximum: 24 hours/day 7 days/week 52 weeks/yr

_____ Serial Number

Startup Data (NO CHANGE)	No. of Startups per day: _____ No. of Startups per year: _____ Duration of each startup: _____ hours
Shutdown Data (NO CHANGE)	No. of Shutdowns per day: _____ No. of Shutdowns per year: _____ Duration of each shutdown: _____ hours

Startup and Shutdown Emissions Data (NO CHANGE)

Pollutants	Startup Emissions		Shutdown Emissions	
	PPM@15% O_2, dry	lb/Hour	PPM@15% O_2, dry	lb/Hour
ROG				
NOx				
CO				
PM10				
SOx				
NH3				

Monitoring and Reporting (NO CHANGE)

Continuous Emission Monitoring System (CEMS)

CEMS Make: _____

CEMS Model: _____

Will the CEMS be used to measure both on-line and startup/shutdown emissions? ○ Yes ○ No

The following parameters will be continuously monitored:

☒ NOx ☒ CO ☒ O_2

☒ Fuel Flow Rate ☒ Ammonia Injection Rate ☐ Other (specify) _____

☐ Ammonia Stack Concentration: Ammonia CEMS Model _____

Ammonia CEMS Make _____

SECTION C: APPLICANT CERTIFICATION STATEMENT

I hereby certify that all information contained herein and information submitted with this application is true and correct.

SIGNATURE OF PREPARER: Mike Waller	TITLE OF PREPARER: Environmental Engr.	PREPARER'S TELEPHONE NUMBER: (805) 764-6003 PREPARER'S E-MAIL ADDRESS: mwaller@algcorp.com
CONTACT PERSON FOR INFORMATION ON THIS EQUIPMENT: John Shao E-MAIL ADDRESS: john.shao@bp.com	CONTACT PERSON'S TELEPHONE NUMBER: (310) 847-5652 FAX NUMBER: (310) 847-5780	DATE SIGNED: 2/18/2010

CONFIDENTIAL INFORMATION

Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to a third party. If you wish to keep certain items as confidential, please complete the following steps:

(a) Make a copy of any page containing confidential information blanked out. Label this page "public copy."
(b) Label the original page "confidential." Circle all confidential items on the page.
(c) Prepare a written justification for the confidentiality of each confidential item. Append this to the confidential copy.

_____ Serial Number

South Coast Air Quality Management District

Form 400-A

Application For Permit To Construct and Permit To Operate

Mail Application To:
P.O. Box 4944
Diamond Bar, CA 91765

Tel: (909) 396-3385
www.aqmd.gov

Section A: Operator Information

1. **Business Name of Operator To Appear On The Permit:**
BP West Coast Products LLC – BP Carson Refinery

2. **Valid AQMD Facility ID (Available on Permit or Invoice issued by AQMD):** 131003

3. **Owner's Business Name (only if different from Business Name of Operator):** Watson Cogeneration Company

Section B: Equipment Location

4. **Equipment Location Address:**
For equipment operated at various locations in AQMD's jurisdiction, provide address of initial site

2350 E. 223rd Street
Street Address

Carson — CA, — 90810 _
City — State — Zip Code

County: (•) Los Angeles ( ) Orange ( ) San Bernardino ( ) Riverside

Contact Name: John Shao

Contact Title: Environmental Project Engr. Phone: (310) 847-5652

Fax: (310) 847-5780 E-Mail: john.shao@bp.com

Section C: Permit Mailing Address

5. **Permit and Correspondence Information:**
☐ Check here if same as equipment location address

P.O. Box 6210
Street Address

Carson — CA — 90749 _ 6210
City — State — Zip Code

Contact Name: John Shao

Contact Title: Environmental Project Engr. Phone: (310) 847-5652

Fax: (310) 847-5780 E-Mail: john.shao@bp.com

Section D: Application Type

The facility is in ( ) RECLAIM ( ) Title V (•) RECLAIM & Title V Program (please check if applicable)

6. **Reason for Submitting Application (Select only ONE):**

- ( ) New Construction (Permit to Construct)
- ( ) Equipment Operating Without A Permit or Expired Permit*
- ( ) Administrative Change
- ( ) Equipment On-Site But Not Constructed or Operational
- ( ) Title V Application (initial, Revisions, etc.)
- ( ) Compliance Plan
- ( ) Facility Permit Amendment
- ( ) Registration/Certification
- ( ) Streamlined Standard Permit
- ( ) Permitted Equipment Altered/ Modified Without Permit Approval*
- ( ) Proposed Alteration/Modification to Permitted Equipment
- (•) Change of Condition For Permit To Operate
- ( ) Change of Condition For Permit To Construct
- ( ) Change of Location—Moving to New Site

Existing Or Previous Permit/Application Number:
(If you checked any of the items in this column, you MUST provide a existing Permit/ Application Number)
411169

* A Higher Permit Processing Fee applies to those items with an asterisk (Rule 301 (c) (1) (D)

7. **Estimated Start Date of Operation/Construction (MM/DD/YYYY):** 02/01/2010

8. **Description of Equipment:**
Process 17, System 2 (Cogeneration Unit No. 2)

9. **Is this equipment portable AND will it be operated at different locations within AQMD's jurisdiction?** (•) No ( ) Yes

10. **For Identical equipment, how many additional applications are being submitted with this application?** (Form 400-A required for each) 3

11. **Are you a Small Business as per AQMD's Rule 102 definition?** (10 employees or less and total gross receipts are $500,000 or less, or a not-for-profit training center?) (•) No ( ) Yes

12. **Has a Notice of Violation (NOV) or a Notice To Comply (NC) been issued for this equipment?**
(•) No ( ) Yes If yes, provide NOV/NC #:

Section E: Facility Business Information

13. **What type of business is being conducted at this equipment location?** Petroleum Refining

14. **What is your businesses primary NAICS Code** (North American Industrial Classification System)? 324110

15. **Are there other facilities in the SCAQMD jurisdiction operated by the same operator?** ( ) No (•) Yes

16. **Are there any schools (K-12) within a 1000-ft. radius of the equipment physical location?** (•) No ( ) Yes

Section F: Authorization/Signature

I hereby certify that all information contained herein and information submitted with this application is true and correct.

17. **Signature of Responsible Official:** Alan Seese

18. **Title:** Environmental Manager

19. **Print Name:** Alan Seese

20. **Date:** 02/19/10

Check List
- [x] Form(s) signed and dated by authorized official
- [x] Supplemental Equipment Form (400-E-XX or 400-E-GEN)
- [x] CEQA Form (400-CEQA) attached
- [x] Payment for permit processing fee attached

Your application will be rejected if any of the above items are missing.

AQMD USE ONLY	APPLICATION/TRACKING #	TYPE B C D	EQUIPMENT CATEGORY CODE:	FEE SCHEDULE: $	VALIDATION
ENG. A R DATE	ENG. A R DATE	CLASS I III IV	ASSIGNMENT Unit Engineer	CHECK/MONEY ORDER #	AMOUNT $	Tracking #

South Coast Air Quality Management District

FORM 400-E-12
GAS TURBINE

Mail Application To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765

Tel: (909) 396-3385
www.aqmd.gov

This form must be accompanied by a completed Application for a Permit to Construct/Operate -Form 400A, Form CEQA, Plot Plan and Stack Form

Permit to be issued to (Business name of operator to appear on permit):
BP West Coast Products LLC - BP Carson Refinery

Address where the equipment will be operated (for equipment which will be moved to various location in AQMD's jurisdiction, please list the initial location site):
2350 E. 223rd Street, Carson, CA 90810 ◉ Fixed Location ○ Various Locations

SECTION A: EQUIPMENT INFORMATION

Turbine (NO CHANGE)

Manufacturer: General Electric

Model No.: PG7111EA

Serial No.:

Size (based on Higher Heating Value - HHV):

Manufacturer Maximum Input Rating: _____ MMBTU/hr _____ kWh

Manufacturer Maximum Output Rating: _____ MMBTU/hr _____ kWh

Function (Check all that apply) (NO CHANGE)

☒ Electrical Generation ☐ Driving Pump/Compressor ☐ Emergency Peaking Unit

☒ Steam Generation ☐ Exhaust Gas Recovery ☐ Other (specify): _____

Cycle Type (NO CHANGE)

○ Simple Cycle ○ Regenerative Cycle

◉ Combined Cycle ○ Other (specify): _____

Combustion Type (NO CHANGE)

○ Tubular ◉ Can-Annular ○ Annular

Fuel (Turbine) (NO CHANGE)

◉ Natural Gas ○ LPG ○ Digester Gas*

○ Landfill Gas* ○ Propane ◉ Refinery Gas* ◉ Other* : Butane

* (If Digester Gas, Landfill Gas, Refinery Gas, and/or Other are checked, attach fuel analysis indicating higher heating value and sulfur content).

Heat Recovery Steam Generator (HRSG) (NO CHANGE)

Steam Turbine Capacity _____ MW

Low Pressure Steam Output Capacity: _____ lb/hr @ _____ °F

High Pressure Steam Output Capacity: _____ lb/hr @ _____ °F

Superheated Steam Output Capacity: _____ lb/hr @ _____ °F

Duct Burner (NO CHANGE)

Manufacturer: John Zink

Model:

Number of burners:

Rating of each burner (HHV):

Type: ○ Low NOx (please attach manufacturer's specifications)

○ Other: _____

Show all heat transfer surface locations with the HRSG and temperature profile

Fuel (Duct Burner) (NO CHANGE)

◉ Natural Gas ○ LPG ○ Digester Gas*

◉ Refinery Gas* ○ Landfill Gas* ○ Propane ○ Other* : _____

*(If Digester Gas, Landfill Gas, Refinery Gas, and/or Other are checked, attach fuel analysis indicating higher heating value and sulfur content).

Air Pollution Control
(NO CHANGE)

- (●) Selective Catalytic Reduction (SCR)*
- ( ) Selective Non-catalytic Reduction (SNCR)*
- (●) Oxidation Catalyst*
- ( ) Other (specify)* _____
- (●) Steam/Water Injection:
  Injection Rate: _____ lbs. water/lbs. fuel, or _____ mole water/mole fuel

* Separate application is required.

Capital Cost:	Installation Cost:	Annual Operating Cost:

Oxidation Catalyst Data
(If Applicable)
(NO CHANGE)

Manufacturer:	Model:
Catalyst Dimensions: Length: ____ ft. ____ in.	Width: ____ ft. ____ in. Height: ____ ft. ____ in.
Catalyst Cell Density: _____ cells/sq. in.	Pressure Drop Across Catalyst: _____
Manufacturer's Guarantee — CO Control Efficiency: ____ %	Catalyst Life: ____ yrs.
Manufacturer's Guarantee — VOC Control Efficiency: ____ %	Operating Temp. Range: ____ °F
Space Velocity (gas flow rate/catalyst volume): _____	Area Velocity (gas flow/wetted catalyst surface area): _____
VOC Concentration into Catalyst: ____ PPMVD @ 15 % O_2	CO Concentration into Catalyst: ____ PPMVD @ 15 % O_2

SECTION B: OPERATION INFORMATION

On-line Emissions Data
(NO CHANGE)

Pollutants	Maximum Emissions Before Control*		Maximum Emissions After Control	
	PPM@15% O_2 dry	lb/Hour	PPM@15% O_2 dry	lb/Hour
ROG				
NOx				
CO				
PM10				
SOx				
NH3				

* Based on temperature, fuel consumption, and MW output

Reference (attach data):
☐ Manufacturer Emission Data ☐ EPA Emission Factors ☐ AQMD Emission Factors ☐ Source Test

Stack or Vent Data
(NO CHANGE)

Stack Height: ____ ft. ____ in.	Stack Diameter: ____ ft. ____ in.
Exhaust Temperature: ____ °F	Exhaust Pressure: ____ inches water column
Exhaust Flow Rate: ____ CFM	Oxygen Level: ____ %

Operating Schedule
(NO CHANGE)

Normal:	24 hours/day	7 days/week	52 weeks/yr
Maximum:	24 hours/day	7 days/week	52 weeks/yr

_____ Serial Number

Startup Data (NO CHANGE)	No. of Startups per day: _____ No. of Startups per year: _____ Duration of each startup: _____ hours
Shutdown Data (NO CHANGE)	No. of Shutdowns per day: _____ No. of Shutdowns per year: _____ Duration of each shutdown: _____ hours

Startup and Shutdown Emissions Data (NO CHANGE)

Pollutants	Startup Emissions		Shutdown Emissions	
	PPM@15% O_2, dry	lb/Hour	PPM@15% O_2, dry	lb/Hour
ROG				
NOx				
CO				
PM10				
SOx				
NH3				

Monitoring and Reporting (NO CHANGE)

Continuous Emission Monitoring System (CEMS)

CEMS Make: _____

CEMS Model: _____

Will the CEMS be used to measure both on-line and startup/shutdown emissions? ○ Yes ○ No

The following parameters will be continuously monitored:

☒ NOx ☒ CO ☒ O_2

☒ Fuel Flow Rate ☒ Ammonia Injection Rate ☐ Other (specify) _____

☐ Ammonia Stack Concentration: Ammonia CEMS Model _____

Ammonia CEMS Make _____

SECTION C: APPLICANT CERTIFICATION STATEMENT

I hereby certify that all information contained herein and information submitted with this application is true and correct.

SIGNATURE OF PREPARER: Mike Waller	TITLE OF PREPARER: Environmental Engr.	PREPARER'S TELEPHONE NUMBER: (805) 764-6003 PREPARER'S E-MAIL ADDRESS: mwaller@algcorp.com
CONTACT PERSON FOR INFORMATION ON THIS EQUIPMENT: John Shao E-MAIL ADDRESS: john.shao@bp.com	CONTACT PERSON'S TELEPHONE NUMBER: (310) 847-5652 FAX NUMBER: (310) 847-5780	DATE SIGNED: 2/18/2010

CONFIDENTIAL INFORMATION

Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to a third party. If you wish to keep certain items as confidential, please complete the following steps:

(a) Make a copy of any page containing confidential information blanked out. Label this page "public copy."
(b) Label the original page "confidential." Circle all confidential items on the page.
(c) Prepare a written justification for the confidentiality of each confidential item. Append this to the confidential copy.

_____ Serial Number

South Coast Air Quality Management District

Form 400-A

Application For Permit To Construct and Permit To Operate

Mail Application To:
P.O. Box 4944
Diamond Bar, CA 91765

Tel: (909) 396-3385
www.aqmd.gov

Section A: Operator Information

1. Business Name of Operator To Appear On The Permit:
BP West Coast Products LLC – BP Carson Refinery

2. Valid AQMD Facility ID (Available on Permit or Invoice issued by AQMD): 131003

3. Owner's Business Name (only if different from Business Name of Operator):
Watson Cogeneration Company

Section B: Equipment Location

4. Equipment Location Address:
For equipment operated at various locations in AQMD's jurisdiction, provide address of initial site

2350 E. 223rd Street
Street Address

Carson — CA, — 90810 _
City — State — Zip Code

County: (•) Los Angeles ( ) Orange ( ) San Bernardino ( ) Riverside

Contact Name: John Shao

Contact Title: Environmental Project Engr. Phone: (310) 847-5652

Fax: (310) 847-5780 E-Mail: john.shao@bp.com

Section C: Permit Mailing Address

5. Permit and Correspondence Information:
☐ Check here if same as equipment location address

P.O. Box 6210
Street Address

Carson — CA, — 90749 _ 6210
City — State — Zip Code

Contact Name: John Shao

Contact Title: Environmental Project Engr. Phone: (310) 847-5652

Fax: (310) 847-5780 E-Mail: john.shao@bp.com

Section D: Application Type

The facility is in ( ) RECLAIM ( ) Title V (•) RECLAIM & Title V Program (please check if applicable)

6. Reason for Submitting Application (Select only ONE):

- ( ) New Construction (Permit to Construct)
- ( ) Equipment Operating Without A Permit or Expired Permit*
- ( ) Administrative Change
- ( ) Equipment On-Site But Not Constructed or Operational
- ( ) Title V Application (Initial, Revisions, etc.)
- ( ) Compliance Plan
- ( ) Facility Permit Amendment
- ( ) Registration/Certification
- ( ) Streamlined Standard Permit
- ( ) Permitted Equipment Altered/ Modified Without Permit Approval*
- ( ) Proposed Alteration/Modification to Permitted Equipment
- (•) Change of Condition For Permit To Operate
- ( ) Change of Condition For Permit To Construct
- ( ) Change of Location—Moving to New Site

Existing Or Previous Permit/Application Number:
(If you checked any of the items in this column, you MUST provide a existing Permit/ Application Number)
411170

* A Higher Permit Processing Fee applies to those items with an asterisk (Rule 301 (c) (1) (D)

7. Estimated Start Date of Operation/Construction (MM/DD/YYYY): 02/01/2010

8. Description of Equipment:
Process 17, System 3 (Cogeneration Unit No. 3)

9. Is this equipment portable AND will it be operated at different locations within AQMD's jurisdiction? (•) No ( ) Yes

10. For Identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each) 3

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are $500,000 or less, or a not-for-profit training center?) (•) No ( ) Yes

12. Has a Notice of Violation (NOV) or a Notice To Comply (NC) been issued for this equipment?
(•) No ( ) Yes If yes, provide NOV/NC #:

Section E: Facility Business Information

13. What type of business is being conducted at this equipment location?
Petroleum Refining

14. What is your businesses primary NAICS Code (North American Industrial Classification System)? 324110

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? ( ) No (•) Yes

16. Are there any schools (K-12) within a 1000-ft. radius of the equipment physical location? (•) No ( ) Yes

Section F: Authorization/Signature

I hereby certify that all information contained herein and information submitted with this application is true and correct.

17. Signature of Responsible Official:

18. Title: Environmental Manager

19. Print Name: Alan Seese

20. Date: 02/19/10

Check List

- [x] Form(s) signed and dated by authorized official
- [x] Supplemental Equipment Form (400-E-XX or 400-E-GEN)
- [x] CEQA Form (400-CEQA) attached
- [x] Payment for permit processing fee attached

Your application will be rejected if any of the above items are missing.

AQMD USE ONLY	APPLICATION/TRACKING #	TYPE B C D	EQUIPMENT CATEGORY CODE:	FEE SCHEDULE: $	VALIDATION
ENG. A R DATE	ENG. A R DATE	CLASS I III IV	ASSIGNMENT Unit Engineer	CHECK/MONEY ORDER #	AMOUNT $	Tracking #

South Coast Air Quality Management District

FORM 400-E-12
GAS TURBINE

Mail Application To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765

Tel: (909) 396-3385
www.aqmd.gov

This form must be accompanied by a completed Application for a Permit to Construct/Operate -Form 400A, Form CEQA, Plot Plan and Stack Form

Permit to be issued to (Business name of operator to appear on permit):
BP West Coast Products LLC - BP Carson Refinery

Address where the equipment will be operated (for equipment which will be moved to various location in AQMD's jurisdiction, please list the initial location site):
2350 E. 223rd Street, Carson, CA 90810 ◉ Fixed Location ○ Various Locations

SECTION A: EQUIPMENT INFORMATION

Turbine (NO CHANGE)

Manufacturer: General Electric

Model No.: PG7111EA

Serial No.:

Size (based on Higher Heating Value - HHV):

Manufacturer Maximum Input Rating: _____ MMBTU/hr _____ kWh

Manufacturer Maximum Output Rating: _____ MMBTU/hr _____ kWh

Function (Check all that apply) (NO CHANGE)

☒ Electrical Generation ☐ Driving Pump/Compressor ☐ Emergency Peaking Unit

☒ Steam Generation ☐ Exhaust Gas Recovery ☐ Other (specify): _____

Cycle Type (NO CHANGE)

○ Simple Cycle ○ Regenerative Cycle

◉ Combined Cycle ○ Other (specify): _____

Combustion Type (NO CHANGE)

○ Tubular ◉ Can-Annular ○ Annular

Fuel (Turbine) (NO CHANGE)

◉ Natural Gas ○ LPG ○ Digester Gas*

○ Landfill Gas* ○ Propane ◉ Refinery Gas* ◉ Other*: Butane

* (If Digester Gas, Landfill Gas, Refinery Gas, and/or Other are checked, attach fuel analysis indicating higher heating value and sulfur content).

Heat Recovery Steam Generator (HRSG) (NO CHANGE)

Steam Turbine Capacity _____ MW

Low Pressure Steam Output Capacity: _____ lb/hr @ _____ °F

High Pressure Steam Output Capacity: _____ lb/hr @ _____ °F

Superheated Steam Output Capacity: _____ lb/hr @ _____ °F

Duct Burner (NO CHANGE)

Manufacturer: John Zink

Model:

Number of burners:

Rating of each burner (HHV):

Type: ○ Low NOx (please attach manufacturer's specifications)

○ Other: _____

Show all heat transfer surface locations with the HRSG and temperature profile

Fuel (Duct Burner) (NO CHANGE)

◉ Natural Gas ○ LPG ○ Digester Gas*

◉ Refinery Gas* ○ Landfill Gas* ○ Propane ○ Other*: _____

*(If Digester Gas, Landfill Gas, Refinery Gas, and/or Other are checked, attach fuel analysis indicating higher heating value and sulfur content).

Air Pollution Control
(NO CHANGE)

- (●) Selective Catalytic Reduction (SCR)*
- ( ) Selective Non-catalytic Reduction (SNCR)*
- (●) Oxidation Catalyst*
- ( ) Other (specify)* _____
- (●) Steam/Water Injection:
  Injection Rate: _____ lbs. water/lbs. fuel, or _____ mole water/mole fuel

* Separate application is required.

Capital Cost:	Installation Cost:	Annual Operating Cost:

Oxidation Catalyst Data (If Applicable)
(NO CHANGE)

Manufacturer:	Model:

Catalyst Dimensions: Length: _____ ft. _____ in. Width: _____ ft. _____ in. Height: _____ ft. _____ in.

Catalyst Cell Density: _____ cells/sq. in.	Pressure Drop Across Catalyst: _____

Manufacturer's Guarantee: CO Control Efficiency: _____ % Catalyst Life: _____ yrs.
VOC Control Efficiency: _____ % Operating Temp. Range: _____ °F

Space Velocity (gas flow rate/catalyst volume): _____	Area Velocity (gas flow/wetted catalyst surface area): _____

VOC Concentration into Catalyst: _____ PPMVD @ 15 % O_2	CO Concentration into Catalyst: _____ PPMVD @ 15 % O_2

SECTION B: OPERATION INFORMATION

On-line Emissions Data
(NO CHANGE)

Pollutants	Maximum Emissions Before Control*		Maximum Emissions After Control	
	PPM@15% O_2 dry	lb/Hour	PPM@15% O_2 dry	lb/Hour
ROG				
NOx				
CO				
PM10				
SOx				
NH3				

* Based on temperature, fuel consumption, and MW output

Reference (attach data):
☐ Manufacturer Emission Data ☐ EPA Emission Factors ☐ AQMD Emission Factors ☐ Source Test

Stack or Vent Data
(NO CHANGE)

Stack Height: _____ ft. _____ in. Stack Diameter: _____ ft. _____ in.
Exhaust Temperature: _____ °F Exhaust Pressure: _____ inches water column
Exhaust Flow Rate: _____ CFM Oxygen Level: _____ %

Operating Schedule
(NO CHANGE)

Normal:	24 hours/day	7 days/week	52 weeks/yr
Maximum:	24 hours/day	7 days/week	52 weeks/yr

_____ Serial Number

Startup Data (NO CHANGE)	No. of Startups per day: _____ No. of Startups per year: _____ Duration of each startup: _____ hours
Shutdown Data (NO CHANGE)	No. of Shutdowns per day: _____ No. of Shutdowns per year: _____ Duration of each shutdown: _____ hours

Startup and Shutdown Emissions Data (NO CHANGE)

Pollutants	Startup Emissions		Shutdown Emissions	
	PPM@15% O_2, dry	lb/Hour	PPM@15% O_2, dry	lb/Hour
ROG				
NOx				
CO				
PM10				
SOx				
NH3				

Continuous Emission Monitoring System (CEMS)

CEMS Make: _____

CEMS Model: _____

Will the CEMS be used to measure both on-line and startup/shutdown emissions? ○ Yes ○ No

Monitoring and Reporting (NO CHANGE)

The following parameters will be continuously monitored:

☒ NOx ☒ CO ☒ O_2

☒ Fuel Flow Rate ☒ Ammonia Injection Rate ☐ Other (specify) _____

☐ Ammonia Stack Concentration: Ammonia CEMS Model _____

Ammonia CEMS Make _____

SECTION C: APPLICANT CERTIFICATION STATEMENT

I hereby certify that all information contained herein and information submitted with this application is true and correct.

SIGNATURE OF PREPARER: Mike Waller	TITLE OF PREPARER: Environmental Engr.	PREPARER'S TELEPHONE NUMBER: (805) 764-6003 PREPARER'S E-MAIL ADDRESS: mwaller@algcorp.com
CONTACT PERSON FOR INFORMATION ON THIS EQUIPMENT: John Shao E-MAIL ADDRESS: john.shao@bp.com	CONTACT PERSON'S TELEPHONE NUMBER: (310) 847-5652 FAX NUMBER: (310) 847-5780	DATE SIGNED: 2/18/2010

CONFIDENTIAL INFORMATION

Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to a third party. If you wish to keep certain items as confidential, please complete the following steps:

(a) Make a copy of any page containing confidential information blanked out. Label this page "public copy."
(b) Label the original page "confidential." Circle all confidential items on the page.
(c) Prepare a written justification for the confidentiality of each confidential item. Append this to the confidential copy.

_____ Serial Number

South Coast Air Quality Management District

Form 400-A

Application For Permit To Construct and Permit To Operate

Mail Application To:
P.O. Box 4944
Diamond Bar, CA 91765

Tel: (909) 396-3385
www.aqmd.gov

Section A: Operator Information

1. Business Name of Operator To Appear On The Permit:
BP West Coast Products LLC – BP Carson Refinery

2. Valid AQMD Facility ID (Available on Permit or Invoice issued by AQMD): 131003

3. Owner's Business Name (only if different from Business Name of Operator):
Watson Cogeneration Company

Section B: Equipment Location

4. Equipment Location Address:
For equipment operated at various locations in AQMD's jurisdiction, provide address of initial site

2350 E. 223rd Street
Street Address

Carson — CA, — 90810 _
City — State — Zip Code

County: (•) Los Angeles ( ) Orange ( ) San Bernardino ( ) Riverside

Contact Name: John Shao

Contact Title: Environmental Project Engr. Phone: (310) 847-5652

Fax: (310) 847-5780 E-Mail: john.shao@bp.com

Section C: Permit Mailing Address

5. Permit and Correspondence Information:
☐ Check here if same as equipment location address

P.O. Box 6210
Street Address

Carson — CA, — 90749 _ 6210
City — State — Zip Code

Contact Name: John Shao

Contact Title: Environmental Project Engr. Phone: (310) 847-5652

Fax: (310) 847-5780 E-Mail: john.shao@bp.com

Section D: Application Type

The facility is in ( ) RECLAIM ( ) Title V (•) RECLAIM & Title V Program (please check if applicable)

6. Reason for Submitting Application (Select only ONE):

- ( ) New Construction (Permit to Construct)
- ( ) Equipment Operating Without A Permit or Expired Permit*
- ( ) Administrative Change
- ( ) Equipment On-Site But Not Constructed or Operational
- ( ) Title V Application (Initial, Revisions, etc.)
- ( ) Compliance Plan
- ( ) Facility Permit Amendment
- ( ) Registration/Certification
- ( ) Streamlined Standard Permit
- ( ) Permitted Equipment Altered/ Modified Without Permit Approval*
- ( ) Proposed Alteration/Modification to Permitted Equipment
- (•) Change of Condition For Permit To Operate
- ( ) Change of Condition For Permit To Construct
- ( ) Change of Location—Moving to New Site

Existing Or Previous Permit/Application Number:
(If you checked any of the items in this column, you MUST provide a existing Permit/ Application Number)
411171

*A Higher Permit Processing Fee applies to those items with an asterisk (Rule 301 (c) (1) (D)

7. Estimated Start Date of Operation/Construction (MM/DD/YYYY): 02/01/2010

8. Description of Equipment:
Process 17, System 4 (Cogeneration Unit No. 4)

9. Is this equipment portable AND will it be operated at different locations within AQMD's jurisdiction? (•) No ( ) Yes

10. For Identical equipment, how many additional applications are being submitted with this application? (Form 400-A required for each) 3

11. Are you a Small Business as per AQMD's Rule 102 definition? (10 employees or less and total gross receipts are $500,000 or less, or a not-for-profit training center?) (•) No ( ) Yes

12. Has a Notice of Violation (NOV) or a Notice To Comply (NC) been issued for this equipment?
(•) No ( ) Yes If yes, provide NOV/NC #:

Section E: Facility Business Information

13. What type of business is being conducted at this equipment location?
Petroleum Refining

14. What is your businesses primary NAICS Code (North American Industrial Classification System)? 324110

15. Are there other facilities in the SCAQMD jurisdiction operated by the same operator? ( ) No (•) Yes

16. Are there any schools (K-12) within a 1000-ft. radius of the equipment physical location? (•) No ( ) Yes

Section F: Authorization/Signature

I hereby certify that all information contained herein and information submitted with this application is true and correct.

17. Signature of Responsible Official:

18. Title:
Environmental Manager

19. Print Name:
Alan Seese

20. Date:
02/19/10

Check List

- ☒ Form(s) signed and dated by authorized official
- ☒ Supplemental Equipment Form (400-E-XX or 400-E-GEN)
- ☒ CEQA Form (400-CEQA) attached
- ☒ Payment for permit processing fee attached

Your application will be rejected if any of the above items are missing.

AQMD USE ONLY	APPLICATION/TRACKING #	TYPE B C D	EQUIPMENT CATEGORY CODE:	FEE SCHEDULE: $	VALIDATION
ENG. A R DATE	ENG. A R DATE	CLASS I III IV	ASSIGNMENT Unit Engineer	CHECK/MONEY ORDER #	AMOUNT $	Tracking #

South Coast Air Quality Management District

FORM 400-E-12
GAS TURBINE

Mail Application To:
SCAQMD
P.O. Box 4944
Diamond Bar, CA 91765

Tel: (909) 396-3385
www.aqmd.gov

This form must be accompanied by a completed Application for a Permit to Construct/Operate -Form 400A, Form CEQA, Plot Plan and Stack Form

Permit to be issued to (Business name of operator to appear on permit):
BP West Coast Products LLC - BP Carson Refinery

Address where the equipment will be operated (for equipment which will be moved to various location in AQMD's jurisdiction, please list the initial location site):
2350 E. 223rd Street, Carson, CA 90810 ◉ Fixed Location ○ Various Locations

SECTION A: EQUIPMENT INFORMATION

Turbine (NO CHANGE)

Manufacturer: General Electric

Model No.: PG7111EA

Serial No.:

Size (based on Higher Heating Value - HHV):

Manufacturer Maximum Input Rating: _____ MMBTU/hr _____ kWh

Manufacturer Maximum Output Rating: _____ MMBTU/hr _____ kWh

Function (Check all that apply) (NO CHANGE)

☒ Electrical Generation ☐ Driving Pump/Compressor ☐ Emergency Peaking Unit
☒ Steam Generation ☐ Exhaust Gas Recovery ☐ Other (specify): _____

Cycle Type (NO CHANGE)

○ Simple Cycle ○ Regenerative Cycle
◉ Combined Cycle ○ Other (specify): _____

Combustion Type (NO CHANGE)

○ Tubular ◉ Can-Annular ○ Annular

Fuel (Turbine) (NO CHANGE)

◉ Natural Gas ○ LPG ○ Digester Gas*
○ Landfill Gas* ○ Propane ◉ Refinery Gas* ◉ Other*: Butane

* (If Digester Gas, Landfill Gas, Refinery Gas, and/or Other are checked, attach fuel analysis indicating higher heating value and sulfur content).

Heat Recovery Steam Generator (HRSG) (NO CHANGE)

Steam Turbine Capacity _____ MW

Low Pressure Steam Output Capacity: _____ lb/hr @ _____ °F

High Pressure Steam Output Capacity: _____ lb/hr @ _____ °F

Superheated Steam Output Capacity: _____ lb/hr @ _____ °F

Duct Burner (NO CHANGE)

Manufacturer: John Zink

Model:

Number of burners:

Rating of each burner (HHV):

Type: ○ Low NOx (please attach manufacturer's specifications)
○ Other: _____
Show all heat transfer surface locations with the HRSG and temperature profile

Fuel (Duct Burner) (NO CHANGE)

◉ Natural Gas ○ LPG ○ Digester Gas*
◉ Refinery Gas* ○ Landfill Gas* ○ Propane ○ Other*: _____

*(If Digester Gas, Landfill Gas, Refinery Gas, and/or Other are checked, attach fuel analysis indicating higher heating value and sulfur content).

Air Pollution Control
(NO CHANGE)

- (●) Selective Catalytic Reduction (SCR)*
- ( ) Selective Non-catalytic Reduction (SNCR)*
- (●) Oxidation Catalyst*
- ( ) Other (specify)* _____
- (●) Steam/Water Injection:
  Injection Rate: _____ lbs. water/lbs. fuel, or _____ mole water/mole fuel

* Separate application is required.

Capital Cost:	Installation Cost:	Annual Operating Cost:

Oxidation Catalyst Data (If Applicable)
(NO CHANGE)

Manufacturer: _____ Model: _____

Catalyst Dimensions: Length: _____ ft. _____ in. Width: _____ ft. _____ in. Height: _____ ft. _____ in.

Catalyst Cell Density: _____ cells/sq. in. Pressure Drop Across Catalyst: _____

Manufacturer's Guarantee
CO Control Efficiency: _____ % Catalyst Life: _____ yrs.
VOC Control Efficiency: _____ % Operating Temp. Range: _____ °F

Space Velocity (gas flow rate/catalyst volume): _____ Area Velocity (gas flow/wetted catalyst surface area): _____

VOC Concentration into Catalyst: _____ PPMVD @ 15 % O_2 CO Concentration into Catalyst: _____ PPMVD @ 15 % O_2

SECTION B: OPERATION INFORMATION

On-line Emissions Data
(NO CHANGE)

Pollutants	Maximum Emissions Before Control*		Maximum Emissions After Control	
	PPM@15% O_2 dry	lb/Hour	PPM@15% O_2 dry	lb/Hour
ROG				
NOx				
CO				
PM10				
SOx				
NH3				

* Based on temperature, fuel consumption, and MW output

Reference (attach data):
☐ Manufacturer Emission Data ☐ EPA Emission Factors ☐ AQMD Emission Factors ☐ Source Test

Stack or Vent Data
(NO CHANGE)

Stack Height: _____ ft. _____ in. Stack Diameter: _____ ft. _____ in.
Exhaust Temperature: _____ °F Exhaust Pressure: _____ inches water column
Exhaust Flow Rate: _____ CFM Oxygen Level: _____ %

Operating Schedule
(NO CHANGE)

Normal: 24 hours/day 7 days/week 52 weeks/yr
Maximum: 24 hours/day 7 days/week 52 weeks/yr

_____ Serial Number

Startup Data (NO CHANGE)	No. of Startups per day: _____ No. of Startups per year: _____ Duration of each startup: _____ hours
Shutdown Data (NO CHANGE)	No. of Shutdowns per day: _____ No. of Shutdowns per year: _____ Duration of each shutdown: _____ hours

Startup and Shutdown Emissions Data (NO CHANGE)

Pollutants	Startup Emissions		Shutdown Emissions	
	PPM@15% O_2, dry	lb/Hour	PPM@15% O_2, dry	lb/Hour
ROG				
NOx				
CO				
PM10				
SOx				
NH3				

Monitoring and Reporting (NO CHANGE)

Continuous Emission Monitoring System (CEMS)

CEMS Make: _____

CEMS Model: _____

Will the CEMS be used to measure both on-line and startup/shutdown emissions? ○ Yes ○ No

The following parameters will be continuously monitored:

☒ NOx ☒ CO ☒ O_2

☒ Fuel Flow Rate ☒ Ammonia Injection Rate ☐ Other (specify) _____

☐ Ammonia Stack Concentration: Ammonia CEMS Model _____

Ammonia CEMS Make _____

SECTION C: APPLICANT CERTIFICATION STATEMENT

I hereby certify that all information contained herein and information submitted with this application is true and correct.

SIGNATURE OF PREPARER: Mike Waller	TITLE OF PREPARER: Environmental Engr.	PREPARER'S TELEPHONE NUMBER: (805) 764-6003 PREPARER'S E-MAIL ADDRESS: mwaller@algcorp.com
CONTACT PERSON FOR INFORMATION ON THIS EQUIPMENT: John Shao E-MAIL ADDRESS: john.shao@bp.com	CONTACT PERSON'S TELEPHONE NUMBER: (310) 847-5652 FAX NUMBER: (310) 847-5780	DATE SIGNED: 2/18/2010

CONFIDENTIAL INFORMATION

Under the California Public Records Act, all information in your permit application will be considered a matter of public record and may be disclosed to a third party. If you wish to keep certain items as confidential, please complete the following steps:

(a) Make a copy of any page containing confidential information blanked out. Label this page "public copy."
(b) Label the original page "confidential." Circle all confidential items on the page.
(c) Prepare a written justification for the confidentiality of each confidential item. Append this to the confidential copy.

Serial Number _____

GENERAL INFORMATION
BP WEST COAST PRODUCTS LLC
BP CARSON REFINERY

PERMIT APPLICATION TO REPLACE CONDITIONS REFERRING TO "COMMON TO COGENERATION UNITS 1,2,3,& 4" WITH "COMMON TO ALL COGENERATION UNITS" AND ADD A COMMON PM-10 EMISSIONS LIMIT (PROCESS 17, SYSTEMS 1-4)

This application is submitted in accordance with the applicable rules and regulations of the South Coast Air Quality Management District (SCAQMD).

GENERAL INFORMATION SUMMARY -FORM 400-E-GI

1. Equipment/Process Location Drawing

Section 3 of this permit application identifies site and property boundaries and adjacent streets. Notably, there are no schools within 1,000 feet of the equipment affected by this project.

2 Process/Project Description

A specific description of the process equipment and the modification is provided in Section 2 to this application.

3. Operating Schedule

A discussion of the operating schedule is provided in Section 4 to this application.

4. Equipment Description

A discussion of the equipment is provided in Section 5 to this application.

5. Process Rate

Not applicable. There will be no changes to the feed/throughput rates for any of the equipment affected by this project.

6. Fuels and Burners Used

Not applicable. There will be no changes to fuels or burner systems used for any of the equipment affected by this project.

7. Flow Diagram

Not applicable. There will be no changes to process flows as a result of this project.

8. Drawings Of Equipment/Process

Not applicable. There will be no changes to equipment drawings as a result of this project.

9. Drawings Of The Exhaust System

Not applicable. There will be no changes to the exhaust system as a result of this project.

10. Stack/Exhaust Emissions Data

BP does not propose to change existing stack/emissions data as part of this project. However, BP does propose the addition of a combined PM-10 emissions limit common to cogenerations units 1-4 and proposed cogeneration unit 5.

11. Air Quality Impact

A discussion of Air Quality Analysis (AQA) and Health Risk Assessment (HRA) is provided in Section 9.

SECTION 1 COMPANY INFORMATION

1.1 Company Name

BP West Coast Products LLC

1.2 Responsible Official

Alan Seese, Environmental Manager – BP Carson Refinery
310-847-5658

1.3 Contact Person

John Shao, Environmental Project Engineer – BP Carson Refinery
310-847-5652

1.4 Physical Address

BP Carson Refinery
2350 E. 223rd Street
Carson, California 90810

1.5 Mailing Address

BP Carson Refinery
Carson One Campus
P.O. Box 6210
Carson, California 90749-6210

SECTION 2 PROCESS/PROJECT DESCRIPTION

The Watson Cogeneration Plant is a combined cycle cogeneration facility that currently uses four GE Frame-7 Gas Turbine Generators to generate electric power and four associated Heat Recovery Steam Generators to produce nominal 600 psig steam. This plant provides steam and electricity to the Refinery and electricity to the Southern California Edison electrical grid.

The purpose of this application is to replace all equipment descriptions/permit conditions referencing "common to cogeneration units 1,2,3,& 4" (Process 17, Systems 1-4) with "common to all cogenerations units" as well as adding a PM-10 emissions limit applicable to the combined emissions of the four existing units and the proposed new cogeneration unit (unit 5).

SECTION 3 FACILITY LOCATION

The BP West Coast Products LLC -BP Carson Refinery (BP) is located in the City of Carson in the southern portion of Los Angeles County. The property boundaries for BP Carson Refinery are shown in Figure 3-1 and Figure 3-2.

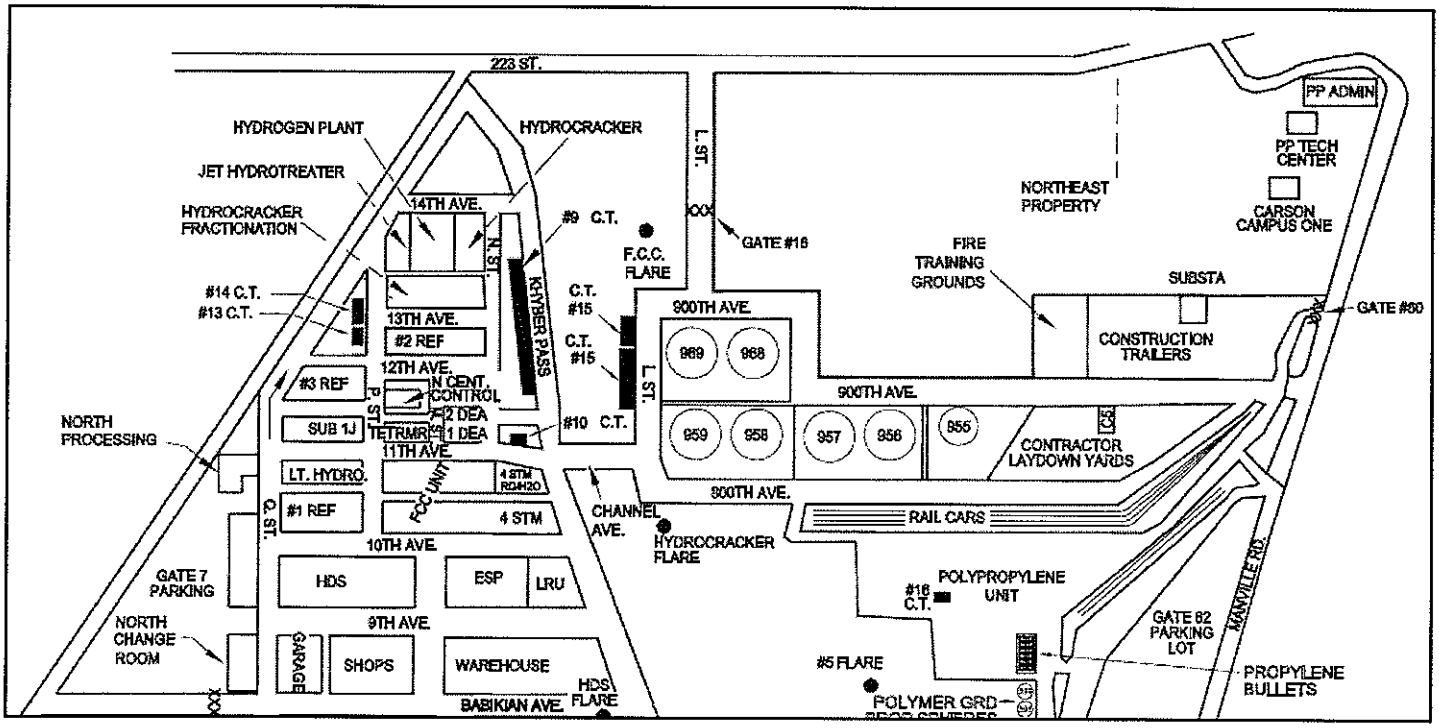

Figure 3-1 BP Carson Refinery – North Area Map

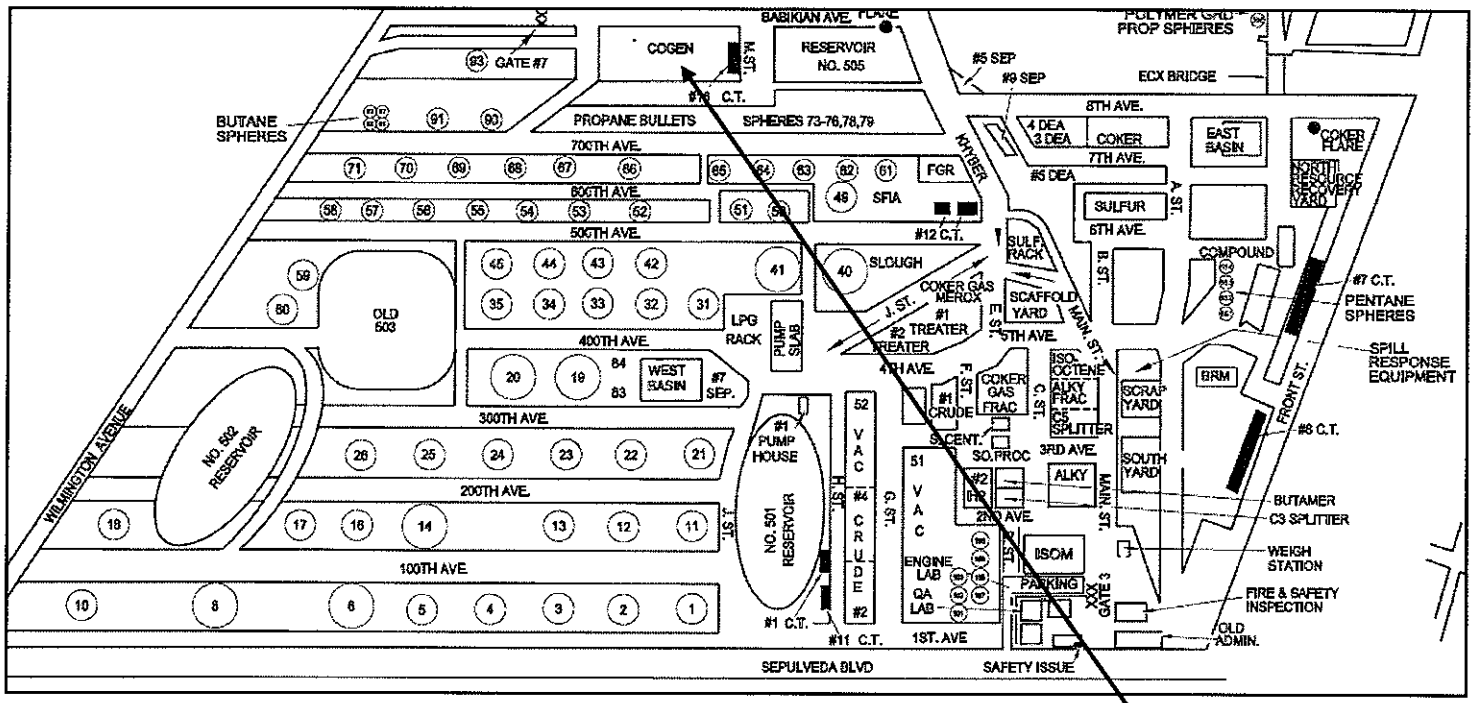

Figure 3-2 BP Carson Refinery – South Area Map

SECTION 4 OPERATING SCHEDULE

This application does not propose any changes to the operating schedule of this equipment. During normal conditions, the Cogeneration Facility operates 24 hours per day, 7 days per week and 52 weeks per year.

SECTION 5 EQUIPMENT DESCRIPTION

BP proposes the following changes in equipment description:

Device ID	Current Description	Proposed Description
D1228	STEAM TURBINE, STEAM, DRIVING 42.78 MVA ELECTRIC GENERATOR, RATED@37.5 MW, (COMMON TO COGENERATION UNITS NO. 1, 2, 3 & 4)	STEAM TURBINE, STEAM, DRIVING 42.78 MVA ELECTRIC GENERATOR, RATED@37.5 MW, **(COMMON TO THE COGENERATION SYSTEM)**
D1229	STEAM TURBINE, STEAM, DRIVING 42.78 MVA ELECTRIC GENERATOR RATED @ 37.5 MW, (COMMON TO COGENERATION UNITS NO. 1, 2, 3 & 4)	STEAM TURBINE, STEAM, DRIVING 42.78 MVA ELECTRIC GENERATOR RATED @ 37.5 MW, **(COMMON TO THE COGENERATION SYSTEM)**
D1231	CONDENSER, STEAM SURFACE, (COMMON TO COGENERATION UNITS NO. 1, 2, 3 & 4)	CONDENSER, STEAM SURFACE, **(COMMON TO THE COGENERATION SYSTEM)**
D1232	CONDENSER, STEAM SURFACE, (COMMON TO COGENERATION UNITS NO. 1, 2, 3 & 4)	CONDENSER, STEAM SURFACE, **(COMMON TO THE COGENERATION SYSTEM)**
D2111	HEAT EXCHANGER, BUTANE D2111 VAPORIZER, RPV4830, (COMMON TO COGENERATION UNITS NO. 1, 2, 3, & 4)	HEAT EXCHANGER, BUTANE D2111 VAPORIZER, RPV4830, **(COMMON TO THE COGENERATION SYSTEM)**
D2112	DRUM, KNOCK OUT, BUTANE, RPV 4831, (COMMON TO COGENERATION UNITS NO. 1, 2, 3 & 4), HEIGHT: 11 FT; DIAMETER: 5 FT 6 IN	DRUM, KNOCK OUT, BUTANE, RPV 4831, **(COMMON TO THE COGENERATION SYSTEM)**, HEIGHT: 11 FT; DIAMETER: 5 FT 6 IN
D2113	HEAT EXCHANGER, BUTANE D2113 SUPERHEATER, RPV4832, (COMMON TO COGENERATION UNITS NO. 1, 2, 3, & 4)	HEAT EXCHANGER, BUTANE D2113 SUPERHEATER, RPV4832, **(COMMON TO THE COGENERATION SYSTEM)**
D2740	COMPRESSOR, NO. 1, RW-0045-087.32, 10,700 SCFM (COMMON TO COGENERATION UNITS NO. 1, 2, 3 & 4)	COMPRESSOR, NO. 1, RW-0045-087.32, 10,700 SCFM **(COMMON TO THE COGENERATION SYSTEM)**
D2775	COMPRESSOR, NO. 2, RW-0046-087.32, D2775 10,700 SCFM (COMMON TO COGENERATION UNITS NO. 1, 2, 3 & 4)	COMPRESSOR, NO. 2, RW-0046-087.32, D2775 10,700 SCFM **(COMMON TO THE COGENERATION SYSTEM)**
D2741	DRUM, RPV-4800, SLOP COLLECTING (COMMON TO COGENERATION UNITS NO. 1, 2, 3 & 4), HEIGHT: 9 FT; DIAMETER: 4 FT	DRUM, RPV-4800, SLOP COLLECTING **(COMMON TO THE COGENERATION SYSTEM)**, HEIGHT: 9 FT; DIAMETER: 4 FT

SECTION 6 EMISSION CALCULATIONS

Change in Equipment Description/Permit Condition

The proposed change in equipment description/permit conditions will not affect emissions from Cogeneration Systems 1-4. No emissions calculations are necessary or provided with this permit application package.

PM-10 Emissions Limit

BP proposes to apply a PM-10 emissions limit of 1,244 lbs/day, applicable to the combined emissions from existing Cogeneration Units 1-4 (Process 17, Systems 1-4) and the proposed new cogeneration unit (unit 5 under permit application numbers 496922, 496924 and 492925). Emissions calculations to support the proposed emissions limit have been provided as part of pending application numbers 496922, 496924 and 492925.

SECTION 7 EVALUATION AND Rule REVIEW

7.1 Regulation II -Permits

Rule 212: Standards for Approving Permits

All equipment associated with this project are expected to continue to operate without emitting air contaminants in violation of the State Health and Safety Code or in violation of SCAQMD's rules and regulations. These devices are not located within 1,000 feet of a school. The modification will not cause an increased cancer risk greater than, or equal to, one in a million ($1x10^{-6}$) during a lifetime of 70 years, or pose a risk of nuisance.

Public notice under Rule 212(g) is *not* required for this permitting action.

Rule 218: Stack Monitoring

The provisions of this rule only apply to continuous carbon monoxide (CO) monitoring. The facility is subject to Regulation XX RECLAIM provisions; therefore, the provisions of this rule are not applicable to NOx and SOx monitoring [see Rule 2001(j)(2)].

7.2 Regulation III – Application Fees

Rule 301: Fees

Permit application fee calculations are included as **Attachment A** to this application package. A check in the amount of $27,355.19 has been attached to this application package. Fee rates are based on the June 5, 2009 revision of Rule 301. Please note that the RECLAIM/Title V Permit Amendment fee was already provided with pending applications 496922, 496924 and 496925.

7.3 Regulation IV -Prohibitions

Rule 401: Visible Emissions

The proposed changes in equipment description and permit conditions are not expected to affect compliance with the provisions of this rule. Continued compliance is anticipated.

Rule 402: Nuisance

The proposed changes in equipment description and permit conditions are not expected to affect compliance with the provisions of this rule. Continued compliance is anticipated.

Rule 404: Particulate Matter - Concentration

Not applicable. The provisions of this rule do not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.

Rule 407: Liquid and Gaseous Air Contaminants

CO Emissions: The proposed changes in equipment description and permit conditions are not expected to affect compliance with the 2,000 ppmv concentration limit imposed by this rule. Continued compliance is anticipated.
SOx Emissions: The facility is subject to Regulation XX RECLAIM provisions; the provisions of this rule, as applicable to SOx emissions, are not applicable [see Rule 2001(j)(2)].

Rule 408: Circumvention
The proposed changes in equipment description and permit conditions are not expected to affect compliance with the provisions of this rule. Continued compliance is anticipated.

Rule 409: Combustion Contaminants
The proposed changes in equipment description and permit conditions are not expected to affect compliance with the 0.1 grain combustion contaminant per cubic foot of gas emissions limit imposed by this rule. Continued compliance with the provisions of this rule is anticipated.

Rule 429: Start-up & Shutdown Exemption Provision for NOx
The facility is subject to Regulation XX RECLAIM provisions; the provisions of this rule are not applicable [see Rule 2001(j)(2)].

Rule 430: Breakdown Provisions
The facility is subject to Regulation XX RECLAIM provisions; the provisions of this rule are not applicable [see Rule 2001(j)(2)].

Rule 431.1: Sulfur Content of Gaseous Fuels
The facility is subject to Regulation XX RECLAIM provisions; the provisions of this rule are not applicable [see Rule 2001(j)(2)].

Rule 474: Fuel Burning Equipment – Oxides of Nitrogen
The facility is subject to Regulation XX RECLAIM provisions; the provisions of this rule are not applicable [see Rule 2001(j)(2)].

Rule 475: Electric Power Generating Equipment
The proposed changes in equipment description and permit conditions are not expected to affect compliance with the 0.01 grain combustion contaminant per cubic foot of gas emissions limit imposed by this rule. Continued compliance with the provisions of this rule is anticipated.

Rule 476: Steam Generating Equipment
NOx Emissions: The facility is subject to Regulation XX RECLAIM provisions; the provisions of this rule are not applicable [see Rule 2001(j)(2)].

Combustion Contaminants: The proposed changes in equipment description and permit conditions are not expected to affect compliance with

the 0.01 grain combustion contaminant per cubic foot of gas emissions limit imposed by this rule. Continued compliance with the provisions of this rule is anticipated.

7.4 Regulation IX – Standards of Performance for New Stationary Sources (NSPS)

NSPS Subpart J: Standards of Performance for Petroleum Refineries

The gas turbines and duct burners are subject to the fuel gas H2S concentration limit of 160 ppmv. The proposed changes in equipment description and permit conditions are not expected to change the regulatory applicability or affect compliance with the provisions of this rule. Continued compliance is anticipated.

NSPS Subpart Ja: Standards of Performance for Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After May 14, 2007.

The gas turbines and duct burners in cogeneration units 1-4 are not currently subject to NSPS Subpart Ja standards. The proposed changes in equipment description and permit conditions relating to cogeneration units 1-4 will not cause an emissions increase, affect throughput or require a capital expenditure exceeding NSPS Ja modification or reconstruction thresholds.

NSPS Subpart D: Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971

A fossil-fuel-fired steam generating unit is defined as a "furnace or boiler used in the process of burning fossil fuel for the purpose of producing steam by heat transfer." BP cogeneration system units 1-4 do not consist of furnaces or boilers and therefore are not subject to the provisions of this regulation.

NSPS Da: Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978

Electric utility steam-generating unit is defined as "any steam electric generating unit that is constructed for the purpose of supplying more than one-third of its potential electric output capacity and more than 25 MW net-electrical output to any utility power distribution system for sale." The cogeneration system was not constructed for the purpose of supplying more than one-third of its potential electrical output and more than 25 MW net-electrical output to any utility distribution system for sale; therefore, the provisions of this regulation do not apply.

NSPS Db: Standards of Performance for Industrial-Commercial Institutional Steam Generating Units

The provisions of this regulation apply to steam generating units with a heat input capacity greater than 29 megawatts (10 million British thermal units per hour) which are constructed, modified or reconstructed after June 19, 1984.

The heat recovery steam generators associated with cogeneration units 1-4 are subject to the 0.2 lbs NOx per million British thermal unit heat input emissions limit of this regulation. The PM and SOx emissions limitations do not apply due to the exclusive burning of natural gas, fuel gas and/or butane. The proposed changes in equipment description and permit conditions are not expected to change the regulatory applicability or affect compliance with the provisions of this rule. Continued compliance is anticipated.

NSPS Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

The provisions of this regulation apply to small industrial-commercial-institutional steam generating units with a maximum design heat input capacity of 29 megawatts (100 million British thermal units per hour) or less, but greater than or equal to 2.9 megawatts (10 MMBtu/hr). BP cogeneration units 1-4 exceed the maximum heat input threshold; therefore, the provisions of this regulation do not apply.

NSPS Subpart GG: Standard of Performance for Stationary Gas Turbines

The provisions of this regulation apply to stationary gas turbines with a peak load heat input rating greater than 10 million British thermal units per hour which are constructed, modified or reconstructed after October 3, 1977. The gas turbines associated with cogeneration units 1-4 are subject to the provisions of this regulation and are subject to both the NOx and SOx effluent concentration limits of this regulation. The proposed changes in equipment description and permit conditions are not expected to change the regulatory applicability or affect compliance with the provisions of this rule. Continued compliance is anticipated.

NSPS Subpart KKKK: Standard of Performance for Stationary Combustion Turbines

The provisions of this regulation apply to stationary combustion turbines with heat input ratings greater than 10 million British thermal units per hour which are constructed, modified or reconstructed after February 18, 2005. Since Cogeneration units 1-4 were installed prior to February 18, 2005, the provisions of this regulation do not apply. The proposed changes in equipment description and permit conditions relating to these units will not cause an emissions increase, affect throughput or require a capital expenditure exceeding NSPS KKKK modification or reconstruction thresholds.

7.5 Regulation X – National Emission Standards for Hazardous Air Pollutants (NESHAPS)

MACT Subpart YYYY: National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines

The provisions of this regulation apply to stationary combustion turbines at major sources of HAP emissions. Although not listed in Section K of the permit, Subpart YYYY applies to cogeneration units 1-4. Cogeneration units 1-4 are considered "existing" units and do not have to meet the requirements of this subpart or Subpart A [see 40 CFR 63.6090(b)(4)]. The proposed changes in equipment description and permit conditions relating to these units will not trigger the "reconstruction" capital expenditure threshold of 50% for the construction of a comparable new unit [see 63.6090(a)(3)]; therefore, no new requirements will apply as a result of this permitting project.

7.6 Regulation XI – Source Specific Standards

Rule 1134: Emissions of Oxides of Nitrogen from Stationary Gas Turbines
The facility is subject to Regulation XX RECLAIM provisions; the provisions of this rule are not applicable [see Rule 2001(j)(2)].

Rule 1135: Emissions of Oxides of Nitrogen from Electric Power Generating Systems
The facility is subject to Regulation XX RECLAIM provisions; the provisions of this rule are not applicable [see Rule 2001(j)(2)].

Rule 1146: Emissions of Oxides of Nitrogen from Industrial, Institutional and Commercial Boilers, Steam Generators, and Process Heaters
The duct burners associated with cogeneration units 1-4 are excluded from the definition of "boiler or steam generator" and therefore are not subject to the provisions of this rule [Rule 1146(b)(4)].

7.7 Regulation XIII – New Source Review

Best Available Control Technology (VOC, CO, PM)
As noted in Section 6, the proposed changes will not cause an emission increase; therefore, BACT is not triggered by this permitting action.

Offsets (VOC, CO, PM)
As noted in Section 6, the proposed changes will not cause an emission increase to cogeneration units 1-4; therefore, offset requirements are not triggered by this permitting action.

Air Quality Modeling (VOC, CO, PM)
As noted in Section 6, the proposed changes will not cause an emission increase; therefore, air quality modeling is not required.

7.8 Regulation XIV – Toxics and Other Non-Criteria Pollutants

Rule 1401: New Source of Toxic Air Contaminants

As noted in Section 6, the proposed changes will not cause an emission increase; therefore, evaluation under Rule 1401 is not required.

Rule 1402: Control of Toxic Air Contaminants From Existing Sources
There will be no increase in toxic air contaminants from existing sources as a result of the proposed modification.

7.9 Regulation XVII – Preventions of Significant Deterioration (PSD)

The proposed changes to cogeneration units 1-4 will not cause an actual or potential increase in the issuance of attainment air contaminants; therefore, PSD provisions are not triggered by this permitting action.

7.10 Regulation XX – Regional Clean Air Incentives Market (RECLAIM)

Best Available Control Technology (NOx, SOx)
As noted in Section 6, the proposed changes will not cause an emission increase; therefore, BACT is not triggered by this permitting action.

RECLAIM Trading Credits (RTC) (NOx, SOx)
As noted in Section 6, the proposed changes will not cause an emission increase; therefore, no additional RTC's are required as a result of this permitting action.

Air Quality Modeling (NOx, SOx)
As noted in Section 6, the proposed changes will not cause an emission increase; therefore, air quality modeling is not required.

The proposed changes in equipment description and permit conditions are not expected to affect the facility's ability to comply with the provisions of this rule. Continued compliance is anticipated.

7.11 Regulation XXX – Title V Permits

Since this application is part of the Watson Cogeneration Steam and Reliability Project, it should be processed with together with the application for cogeneration unit number 5 as a Title V Significant Permit Revision due to:

1. The proposed installation of cogeneration unit number 5 will attempt to "[establish] or [change] a permit condition that the facility assumes to avoid an applicable requirement" (PM-10 offsets) *and*
2. The proposed installation of cogeneration unit number 5 will be "new equipment subject to a New Source Performance Standard (NSPS) pursuant to 40 CFR Part 60, or a National Emission Standard for Hazardous Air Pollutants (NESHAP) pursuant to 40 CFR Part 61 or 40 CFR Part 63 [see Rule 3000(b)(28)].

7.12 40 CFR PART 40 – COMPLIANCE ASSURANCE MONITORING

Compliance Assurance Monitoring (CAM) provisions do not apply to cogeneration units 1-4 based on the following criteria:

1. ROG, SOx and PM: Uncontrolled emissions from several of these pollutants may exceed major source thresholds; however, these pollutants do not use a control device to meet these emissions limitations [see 40 CFR 64.2(a)(2)].
2. NOx and CO: Uncontrolled emissions of these pollutants exceed major source thresholds, are subject to an emissions limitation, and use a control device to meet these standards (SCR and a CO oxidation catalyst) [see 40 CFR 64.2(a)]; however, these pollutants are monitored using a Continuous Emissions Monitoring System (CEMS) and are exempt from the provisions of CAM [see 40 CFR 64.2(b)(vi)].

SECTION 8 BEST AVAILABLE CONTROL TECHNOLOGY (BACT) ANALYSIS

As noted in Section 6, the proposed changes will not cause an emission increase; therefore, BACT is not triggered by this permitting action.

SECTION 9 AIR QUALITY IMPACTS ANALYSIS AND HEALTH RISK ASSESSMENT

As noted in Section 6, the proposed changes will not cause an emission increase; therefore, an air quality impact and toxic risk analysis is not required as a result of this permitting action.

SECTION 10 MODIFICATIONS TO PERMIT CONDITIONS

Please make modification(s) to the following permit condition(s):

GAS TURBINE CONDITIONS

Permit Condition A63.12

Current: The operator shall limit emissions from this equipment as follows:

ROG Less than or equal to 108 lbs/day

NOX Less than or equal to 2156 lbs/day

SOX Less than or equal to 59 lbs/day

CO Less than or equal to 82 lbs/day

PM Less than or equal to 186 lbs/day

The operator shall calculate the emissions, as the total emissions from the waste heat boiler exhaust of a cogeneration unit during the 24 hours of operation following firing.

[Rule 1303(b)(2)-Offset, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Proposed New Condition A63.xx

Proposed: The operator shall limit emissions from this equipment as follows:

PM-10 Less than or equal to 1,244 lbs per day

For purposes of this condition, this limit applies to the total combined emissions of the units to which this permit condition applies.

[Rule 1303(b)(2)-Offset, 12-6-2002, Rule 1304(c)(2), 6-14-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239, Dxxxx (Proposed Cogeneration Unit No. 5)]

Basis: This proposed permit condition is requested in order to qualify for Rule 1304(c)(2) concurrent facility modification offset exemption by limiting aggregated PM-10 emissions from cogeneration units 1-5 to the maximum emissions evaluated for cogeneration units 1-4.

Permit Condition A99.1

Current: The 8 PPM NOX emission limit(s) shall not apply when this equipment is operating during startup and shutdown modes.

[Rule 2005, 5-6-2005] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition A99.2

Current: The 2.5 PPM CO emission limit(s) shall not apply when the associated gas turbine is operating at less than 85 percent of the rated capacity. This condition refers to CO emission limit.

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition A99.3

Current: The 2.5 PPM CO emission limit(s) shall not apply when the equipment is operating at startup and shutdown modes.

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition A248.1

Current: The 8 PPM NOX emission limit is dry, corrected to 15 percent oxygen.

[Rule 2005, 5-6-2005] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition A248.2

Current: The 2 PPM SOX emission limit is dry, corrected to 15 percent oxygen.

[Rule 2005, 5-6-2005] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition A248.3

Current: The 2.5 PPM CO emission limit is dry, corrected to 15 percent oxygen.

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition A248.4

Current: The 4.5 PPM CO emission limit is dry, corrected to 15 percent oxygen.

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition A327.1

Current: For the purpose of determining compliance with District Rule 475, combustion contaminant emissions may exceed the concentration limit or the mass emission limit listed, but not both limits at the same time.

[Rule 475, 10-8-1976; Rule 475, 8-7-1978] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition B61.1

Current: The operator shall only use refinery gas containing the following specified compounds:

Total Sulfur less than 100 ppmv.

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240]

Proposed: No change requested.

Permit Condition B61.2

Current: The operator shall only use butane containing the following specified compounds:

Total Sulfur less than 50 ppmv

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240]

Proposed: No change requested.

Permit Condition B61.3

Current: The operator shall only use natural gas containing the following specified compounds:

Total Sulfur less than 5 ppmv

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240]

Proposed: No change requested.

Permit Condition B61.4

Current: The operator shall not use fuel gas, except uncombined natural gas which is not regulated by the condition, containing the following specified compounds:

H2S greater than 160 ppmv

[40CFR 60 Subpart J, 6-24-2008] [Devices subject to this condition: D27, D29, D31, D33, D67, D69, D151, D153, D155, D250, D252, D416, D417, D418, D419, D421, D423, D425, D532, D535, D538, D539, D541, D570, D625, D626, D627, D628, D629, C910, D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240, D1262, C1326, D1439, D1465, C2413, D2837]

Proposed: No change requested.

Permit Condition C1.33

Current: The operator shall limit the duration of shutdown to no more than 4 hour(s). For the purpose of this condition, "duration of shutdown" shall be defined as the duration prior to extinguishing the flame in the gas turbine.

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition C1.34

Current: The operator shall limit the duration of startup to no more than 8 hour(s). For the purpose of this condition, "duration of startup" shall be defined as the duration beginning immediately following initial firing of the gas turbine.

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition D12.1

Current: The operator shall install and maintain a(n) continuous monitoring system to accurately indicate the fuel usage at the gas turbine for each fuel being fired. The operator shall also install and maintain a device to continuously record the parameter being measured. The measuring device or gauge shall be accurate to within + or - 5.0 percent. It shall be calibrated once every 12 months.

[Rule 1303(b)(2)-Offset, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition D12.2

Current: The operator shall install and maintain a(n) continuous monitoring system to accurately indicate the steam-to-fuel ratio at the gas turbine for each fuel fired. The operator shall also install and maintain a device to continuously record the parameter being measured. The measuring device or gauge shall be accurate to within + or - 5.0 percent. It shall be calibrated once every 12 months.

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition D90.3

Current: The operator shall periodically analyze the fuel gas for total sulfur content in the refinery gases and butane used in the cogeneration facility according to the following specifications:

The operator shall analyze once every week.

[Rule 2005, 5-6-2005; Rule 3004(a)(4)-Periodic Monitoring, 12-12-1997] [Devices subject to this condition: D860, D866, D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240]

Proposed: No change requested.

Permit Condition D90.4

Current: The operator shall continuously monitor the H2S concentration in the fuel gases before being burned in this device according to the following specifications:

The operator shall use Gas Chromatograph meeting the requirements of 40CFR60 Subpart J to monitor the parameter. The operator shall also

install and maintain a device to continuously record the parameter being monitored. The operator may monitor the H2S concentration at a single location for fuel combustion devices, if monitoring at this location accurately represents the concentration of H2S in the fuel gas being burned in this device.

[40CFR 60 Subpart J, 6-24-2008] [Devices subject to this condition: D27, D29, D31, D33, D67, D69, D151, D153, D155, D250, D252, D313, D416, D417, D418, D419, D421, D423, D425, D532, D535, D538, D539, D541, D570, D625, D626, D627, D628, D629, C910, D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240, D1262, D1439, C2413, D2837]

Proposed: No change requested.

Permit Condition D90.17

Current: The operator shall periodically monitor the H2S concentration at the inlet of this device according to the following specifications:

The Alternative Monitoring Plan (AMP) approved by the United States Environmental Protection Agency (USEPA) on July 11, 2003 for the periodic monitoring and reporting of H2S concentration for refinery gas stream to four WCC turbines In addition, the operator shall also comply with all other requirements of the AMP issued by the USEPA on July 11, 2003 for four WCC turbines.

[40CFR 60 Subpart A, 6-13-2007; 40CFR 60 Subpart J, 6-24-2008] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition D94.1

Current: The operator shall install, maintain and operate a sampling line from the sampling port and made accessible in the gas turbine exhaust duct and after the waste heat boiler in accordance with District guidelines.

[Rule 1303(a)(1)-BACT, 5-10-1996; Rule 1303(b)(2)-Offset, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition E17.1

Current: The operator shall not use more than 4 of the following items simultaneously:

Device ID: D1226 (Turbine, Cogeneration Unit No. 1)

Device ID: D1233 (Turbine, Cogeneration Unit No. 2)

Device ID: D1236 (Turbine, Cogeneration Unit No. 3)

Device ID: D1262 (No. 42 Boiler)

Device ID: D1239 (Turbine, Cogeneration Unit No. 4)

[Rule 1303(b)(2)-Offset, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: **BP requests the removal of this permit condition since it is requesting the removal of the No. 42 Boiler (D1262).**

Permit Condition E54.1

Current: The operator is not required to vent this equipment to the following equipment if any of the requirements listed below are met:

Device ID: D2808 [DRUM, KNOCK OUT, VERTICAL, SFIA VAPOR RECOVERY WEST]

Requirement number 1: During periods of startup and shutdown modes.

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240]

Proposed: No change requested.

Permit Condition E73.1

Current: Notwithstanding the requirements of Section E conditions, the operator may, at his discretion, choose not to use steam injection if any of the following requirement(s) are met:

Startup and shutdown modes of operation.

[Rule 2005, 5-6-2005] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition E226.1

Current: **The following condition number(s) shall only apply if any of the requirement(s) stated below are met:**

Condition number 17-1

Requirement 1: Boiler No. 42 is in operation

[Rule 1303(b)(2)-Offset, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: BP requests the removal of this permit condition since it is requesting the removal of the No. 42 Boiler (D1262).

Permit Condition H23.1

Current: This equipment is subject to the applicable requirements of the following rules or regulations:

H2S; 40CFR60, SUBPART J

[40CFR 60 Subpart J, 6-24-2008] [Devices subject to this condition: D27, D29, D31, D33, D67, D69, D151, D153, D155, D250, D252, D313, D416, D417, D418, D419, D421, D423, D425, D532, D535, D538, D539, D541, D570, D625, D626, D627, D628, D629, C910, D1227, D1233, D1234, D1236, D1237, D1239, D1240, D1262, C1326, D1439, D1465, C2413, D2837]

Proposed: No change requested.

Permit Condition H23.18

Current: This equipment is subject to the applicable requirements of the following rules or regulations:

NOX; 40CFR60, SUBPART GG

SOX; 40CFR60, SUBPART GG

H2S; 40CFR60, SUBPART J

[40CFR 60 Subpart GG, 2-24-2006; 40CFR 60 Subpart J, 6-24-2008] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

Permit Condition K67.3

Current: The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Type and quantity of fuel usage, ammonia usage, actual and corrected outlet NOX emission concentration.

[Rule 1303(b)(2)-Offset, 5-10-1996] [Devices subject to this condition: D1226, D1233, D1236, D1239]

Proposed: No change requested.

DUCT BURNER CONDITIONS

Permit Condition A327.2

Current: For the purpose of determining compliance with District Rule 476, combustion contaminant emissions may exceed the concentration limit or the mass emission limit listed, but not both limits at the same time.

[Rule 476, 10-8-1976] [Devices subject to this condition: D1227, D1234, D1237, D1240, D1262]

Proposed: No change requested.

Permit Condition B61.1

Current: The operator shall only use refinery gas containing the following specified compounds:

Total Sulfur less than 100 ppmv

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240]

Proposed: No change requested.

Permit Condition B61.2

Current: The operator shall only use butane containing the following specified compounds:

Total Sulfur less than 50 ppmv

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240]

Proposed: No change requested.

Permit Condition B61.3

Current: The operator shall only use natural gas containing the following specified compounds:

Total Sulfur less than 5 ppmv

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240]

Proposed: No change requested.

Permit Condition B61.4

Current: The operator shall not use fuel gas, except uncombined natural gas which is not regulated by the condition, containing the following specified compounds:

H2S greater than 160 ppmv

[40CFR 60 Subpart J, 6-24-2008] [Devices subject to this condition: D27, D29, D31, D33, D67, D69, D151, D153, D155, D250, D252, D416, D417, D418, D419, D421, D423, D425, D532, D535, D538, D539, D541, D570, D625, D626, D627, D628, D629, C910, D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240, D1262, C1326, D1439, D1465, C2413, D2837]

Proposed: No change requested.

Permit Condition D90.3

Current: The operator shall periodically analyze the fuel gas for total sulfur content in the refinery gases and butane used in the cogeneration facility according to the following specifications:

The operator shall analyze once every week.

[Rule 2005, 5-6-2005; Rule 3004(a)(4)-Periodic Monitoring, 12-12-1997] [Devices subject to this condition: D860, D866, D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240]

Proposed: No change requested.

Permit Condition D90.4

Current: The operator shall continuously monitor the H2S concentration in the fuel gases before being burned in this device according to the following specifications:

The operator shall use Gas Chromatograph meeting the requirements of 40CFR60 Subpart J to monitor the parameter. The operator shall also install and maintain a device to continuously record the parameter being monitored. The operator may monitor the H2S concentration at a single location for fuel combustion devices, if monitoring at this location accurately represents the concentration of H2S in the fuel gas being burned in this device.

[40CFR 60 Subpart J, 6-24-2008] [Devices subject to this condition: D27, D29, D31, D33, D67, D69, D151, D153, D155, D250, D252, D313, D416, D417, D418, D419, D421, D423, D425, D532, D535, D538, D539, D541, D570, D625, D626, D627, D628, D629, C910, D1226, D1227,

D1233, D1234, D1236, D1237, D1239, D1240, D1262, D1439, C2413, D2837]

Proposed: No change requested.

Permit Condition E54.1

Current: The operator is not required to vent this equipment to the following equipment if any of the requirements listed below are met:

Device ID: D2808 [DRUM, KNOCK OUT, VERTICAL, SFIA VAPOR RECOVERY WEST]

Requirement number 1: During periods of startup and shutdown modes

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: D1226, D1227, D1233, D1234, D1236, D1237, D1239, D1240]

Proposed: No change requested.

Permit Condition E71.1

Current: The operator shall not fire this equipment during the startup mode of operation.

[Rule 1303(b)(2)-Offset, 5-10-1996] [Devices subject to this condition: D1227, D1234, D1237, D1240]

Proposed: No change requested.

Permit Condition H23.1

Current: This equipment is subject to the applicable requirements of the following rules or regulations:

H2S; 40CFR60, SUBPART J

[40CFR 60 Subpart J, 6-24-2008] [Devices subject to this condition: D27, D29, D31, D33, D67, D69, D151, D153, D155, D250, D252, D313, D416, D417, D418, D419, D421, D423, D425, D532, D535, D538, D539, D541, D570, D625, D626, D627, D628, D629, C910, D1227, D1233, D1234, D1236, D1237, D1239, D1240, D1262, C1326, D1439, D1465, C2413, D2837]

Proposed: No change requested.

Permit Condition H23.19

Current: This equipment is subject to the applicable requirements of the following rules or regulations:

H2S; 40CFR60, SUBPART J

NOX; 40CFR60, SUBPART Db

[40CFR 60 Subpart Db, 1-28-2009; 40CFR 60 Subpart J, 6-24-2008] [Devices subject to this condition: D1227, D1234, D1237, D1240]

Proposed: No change requested.

SCR SYSTEM CONDITIONS

Permit Condition A99.4

Current: The 20 ppm NH3 emission limit(s) shall not apply when this equipment is operating at startup and shutdown modes.

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: C1242, C1248, C1252, C1256]

Proposed: No change requested.

Permit Condition D12.9

Current: The operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature at the inlet to the SCR unit.

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: C1242, C1248, C1252, C1256]

Proposed: No change requested.

Permit Condition D28.1

Current: The operator shall conduct source test(s) in accordance with the following specifications:

The test shall be conducted at least annually. The test shall be conducted to determine the NOX emissions at the outlet. The test shall be conducted to determine the SOX emissions at the outlet. The test shall be conducted to determine the flow rate at the outlet. The test shall be conducted to determine the CO emissions at the outlet. The test shall be conducted to determine the total hydrocarbon emissions at the outlet. The test shall be conducted to determine the total PM emissions at the outlet. The test shall be conducted to determine the NH3 emissions at the outlet. The test shall be conducted to determine the formaldehyde emissions at the outlet.

[Rule 1303(a)(1)-BACT, 5-10-1996; Rule 1303(b)(2)-Offset, 5-10-1996; Rule 3004(a)(4)-Periodic Monitoring, 12-12-1997] [Devices subject to this condition: C1242, C1248, C1252, C1256]

Proposed: No change requested.

Permit Condition E73.2

Current: Notwithstanding the requirements of Section E conditions, the operator may, at his discretion, choose not to use ammonia injection if any of the following requirement(s) are met:

Temperature measured at the SCR inlet is less than 500 Deg. F

[Rule 1303(a)(1)-BACT, 5-10-1996] [Devices subject to this condition: C1242, C1248, C1252, C1256]

Proposed: No change requested.

Permit Condition D82.1

Current: The operator shall install and maintain a CEMS to measure the following parameters:

Oxygen concentration in percent volume.

CO concentration in ppmv.

Concentrations shall be corrected to 15 percent oxygen on a dry basis.

[Rule 1303(a)(1)-BACT, 5-10-1996; Rule 1303(b)(2)-Offset, 5-10-1996] [Devices subject to this condition: C1243, C1249, C1253, C1257]

Proposed: No change requested.

ATTACHMENT A

PERMIT APPLICATION FEE CALCULATIONS

PERMIT APPLICATION FEE FOR:	**Carson Steam Project**
BP File Number:	**6A01-0046391**
BP Project Engineer:	**John Shao**

Device	Device ID	Previous A/N	Process ID	System ID	Schedule	Schedule Description	Application Purpose	Base Application Fee	Apply Identical Unit Fee Discount?	Penalty For Operating Without A Permit?	Apply Expedite Fee?	Total Application Fees
Cogen Unit No. 1	System	411168	17	1	G	Gas Turbine, >50 MW, other fuel	Change of condition to reflect proposed new train and impose a common PM limit to all 5 trains.	$ 10,942.07	No	No	No	**$ 10,942.07**
Cogen Unit No. 2	System	411169	17	2	G	Gas Turbine, >50 MW, other fuel		$ 10,942.07	Yes	No	No	**$ 5,471.04**
Cogen Unit No. 3	System	411170	17	3	G	Gas Turbine, >50 MW, other fuel		$ 10,942.07	Yes	No	No	**$ 5,471.04**
Cogen Unit No. 4	System	411171	17	4	G	Gas Turbine, >50 MW, other fuel		$ 10,942.07	Yes	No	No	**$ 5,471.04**

Subtotal:	$27,355.19
RECLAIM & Title V Permit Amendment Fee	$0.00
Total Fees:	**$27,355.19**

Note 1: Based on Rule 301 as amended June 5, 2009
Note 2: "Total Application Fees" are rounded to the nearest penny for each device in accordance with SCAQMD guidelines.
Note 3: RECLAIM/Title V Permit Amendment Fee was already provided with A/Ns 496922, 496924 and 496925.

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION
FOR THE *WATSON COGENERATION STEAM AND ELECTRICITY RELIABILITY PROJECT*

Docket No. 09-AFC-1

PROOF OF SERVICE LIST
(Revised 1/27/10)

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*indicates change

DECLARATION OF SERVICE

I, Cindy Kyle-Fischer, declare that on March 2, 2010, I served and filed copies of the attached *Application for Change of Condition to Watson Cogeneration Units 1-4 (Watson Cogeneration Steam and Electric Reliability Project)* and the attached *Addendum Application for Using Aqueous Ammonia in Watson Cogeneration Steam and Electric Reliability Project, A/Ns 496922, 496924, and 496925*, each dated February 24, 2010. The original documents, filed with the Docket Unit, are accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: **[www.energy.ca.gov/sitingcases/watson]**.

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(*Check all that Apply*)

FOR SERVICE TO ALL OTHER PARTIES:

_X_ sent electronically to all email addresses on the Proof of Service list

_X_ by personal delivery or by depositing in the United States mail at Denver, Colorado with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list above to those addresses **NOT** marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

_X_ sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (***preferred method***);

OR

____depositing in the mail an original and ___ paper copies, as follows:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 09-AFC-1
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct.

Cindy Kyle-Fischer