

**Northwest Clean Air Agency (NWCAA) hereby issues
Order of Approval to Construct (OAC) 1200**

Project Summary:

- Replace two existing delayed coker unit heaters used for thermal cracking with two new, larger, heaters. Each new heater is rated at 303 MMBtu/hr (HHV) and will be fired on coker off-gas.
- Replace the boiler feed water circulation pump to recover heat from the coker unit.
- Install a lean oil absorption system with compressor to recover additional light components from coker off gas. These recovered hydrocarbons will be sent to downstream units to recover light components.
- Install new bypasses for heat exchangers in the crude unit preheat system to accommodate online cleaning capability.

Approved Emission Units:

- Two (2) 303 MMBtu/hr (HHV) capacity coker heaters (East and West), with ultra-low NOx burners (ULNB), coker off-gas as a fuel source.
- One (1) Lean Oil Adsorption System for recovering light components from coker off-gas.
- Components at the delayed coker unit (including lean oil adsorption system) and crude unit.

Owner/Operator	Facility Name and Location
BP West Coast Products LLC Cherry Point Refinery 4519 Grandview Road Blaine, WA 98230 Contact: Scott Inloes, Senior Environmental Engineer	BP Cherry Point Refinery 4519 Grandview Road Blaine, WA 98230

Note that in addition to other applicable rules and regulations, one or more of the approved emission units are subject to applicable portions of the following federal regulations:

New Source Performance Standards (NSPS)

- 40 CFR 60 Subpart A - General Provisions
- 40 CFR 60 Subpart Ja - Standards of Performance for Petroleum Refineries
- 40 CFR 60 Subpart GGG - Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced Before November 7, 2006 [references portions of Subpart VV].
- 40 CFR 60 Subpart NNN - Standards of Performance for Synthetic Organic Chemical Manufacturing - Distillation

National Emission Standards for Hazardous Air Pollutants (NESHAP)/Maximum Achievable Control Technology Standards (MACT)

- 40 CFR 63 Subpart A – General Provisions
- 40 CFR 63 Subpart CC – National Emission Standards for Hazardous Air Pollutants: Petroleum Refineries
- 40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants: Boilers and Process Heaters
- 40 CFR 61 Subpart FF – National Emission Standards for Benzene Waste Operations

Issuance of this Order is authorized by Northwest Clean Air Agency Regulation Section 300. The Owner/Operator must comply with the following restrictions and conditions¹:

- (1) Comply with the requirements of 40 CFR 60 Subpart GGGa for components at the delayed coker unit (including lean oil adsorption system).
- (2) Comply with the requirements of 40 CFR 60 Subpart GGGa for components at the crude unit.
- (3) During commissioning of the East and West Coker Heaters and until the North and South Coker Heaters are permanently shut-down, feed residual oil to only two of the four coker heaters (North, South, East, and West Coker Heaters) at any one time.
- (4) Permanently shut-down the existing coker heaters (North and South Coker Heaters) within 12 months after startup of the new East and West Coker Heaters. If the East and West Coker Heaters are started-up on different dates, shut-down at least one of the existing coker heaters (either North or South) within 12 months of the startup of the first new coker

¹ Nothing in this permit is intended to, or shall, alter or waive any applicable law [including but not limited to defenses, entitlements, challenges or clarifications related to the Credible Evidence Rule, 62 FR 8315 (Feb. 27, 1997)] concerning the use of data for any purpose under the Act, generated by the reference method specified herein or otherwise.

Pursuant to Section 300.10 of the NWCAA Regulation and ch 43.21B RCW, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon the NWCAA within 30 days of the date the applicant receives this Order. Additional information regarding appeal procedures can be found at: <http://www.eluho.wa.gov/> under PCHB.

heater. Shut down the second existing coker heater within 12 months after the startup of the second new coker heater.

- (5) Provide written notice to the NWCAA of the startup dates of the East Coker Heater, the West Coker Heater, and the Lean Oil Adsorption System. Send the notice(s) (postmark) no later than 15 days after startup of each unit and include a reference to OAC 1200.
- (6) Provide written notice to the NWCAA of the permanent shut-down dates of the North Coker Heater and South Coker Heater. Send the notice(s) (postmark) no later than 30 days after the permanent shut-down of each heater and include a reference to OAC 1200.

Agata McIntyre, P.E.
Engineering Manager

Mark Buford
Deputy Director