



BP Cherry Point Refinery
4519 Grandview Road
Blaine, Washington 98230
Telephone 360 371-1500

January 13, 2017

Ms. Robyn Jones
Northwest Clean Air Agency
1600 South Second Street
Mt. Vernon, WA 98273-5202

**Re: Title V Air Operating Permit Renewal Application
BP Cherry Point Refinery**

Ms. Jones:

BP West Coast Products, LLC (BP) owns and operates the Cherry Point Refinery, located at 4519 Grandview Road near the community of Birch Bay in Whatcom County, Washington. Northwest Clean Air Agency (NWCAA) issued the current Air Operating Permit (AOP) 015R1M1 on January 15, 2013. The current AOP will expire on January 15, 2018, and NWCAA requested an AOP renewal application be submitted by January 15, 2017 (one year prior to the AOP expiration date). BP formatted this AOP renewal application after consulting with NWCAA staff and applicable requirements in NWCAA Regulation Section 322 and WAC 173-401-510.

Key components of the AOP renewal application include:

- A mark-up of the current AOP and NWCAA's AOP Renewal Application Form;
- Discussion of new and modified permits issued by NWCAA and Washington Department of Ecology (Ecology);
- Discussion of new applicable air quality regulations;
- Requests to change current AOP monitoring, recordkeeping, and reporting requirement (MRRR) language; and
- Requests to update facility contact information and other administrative changes within the current AOP.

New and Modified Permits

NWCAA and Ecology have issued several new and modified Orders of Approval (OACs) and Prevention of Significant Deterioration (PSD) permits to the refinery since the issuance date of our current AOP. The AOP renewal application incorporates new permit conditions from these permits, including:

- OAC 1141 (Naphtha Reliability Improvement Project) – Incorporating new source performance standards (NSPS) and national emission standards for hazardous air pollutants (NESHAPs) requirements for new components in the naphtha hydrodesulfurization (HDS) unit;
- OAC 1201a (Sulfur Plant Modification) – Incorporating new permit approval conditions, NSPS, and NESHAP requirements for physical changes made to the sulfur plant;
- PSD 07-01 A2 (Boilers 6 & 7 PM10 Permit Revision) – Incorporating revised permit approval conditions for PM₁₀ emission limits; and

- Best Available Retrofit Technology (BART) Compliance Order No. 7836, Revision 2 – Incorporating revised compliance order requirements.

New Applicable Requirements

On December 1, 2015 EPA amended NSPS Subpart Ja (petroleum refineries), NESHAP Subpart CC (petroleum refineries), and Subpart UUU (catalytic cracking, catalytic reforming, and sulfur plants). EPA referred to the series of regulatory amendments as the "Refinery Sector Rule." EPA followed-up with additional refinery sector amendments in July 13, 2016 and opened specific refinery sector rule language for reconsideration on October 18, 2016. EPA also amended sections of NESHAP Subpart DDDDD (boilers and process heaters) to ensure consistency with recent court decisions.

Relevant NSPS and NESHAP changes apply to startup, shutdown and malfunction provisions, pressure relief devices, maintenance vents, flares, tanks, marine loading operations, sulfur recovery units, delayed coker units, catalytic reforming units, electronic reporting requirements, and establishing benzene fence-line monitoring programs. Proposed AOP language for several of these NSPS and NESHAP requirements indicate their future compliance dates.

In September 2016, Ecology finalized the Clean Air Rule (WAC 173-442) that caps greenhouse gas emissions from covered parties and requires annual greenhouse gas emission reductions. BP is a covered party under the CAR definitions and is currently working with Ecology to determine baseline greenhouse gas emissions and an emission reduction pathway.

Changes to Current MRRRs

The AOP renewal application proposes to current gapfilling MRRRs for the #2 reformer NOx and CO emission limits, #3 calciner scrubber SO₂ control efficiency limit, and truck loading rack vapor recovery pressure limits. Additional information regarding the requested MRRR changes is provided in the enclosed NWCAA AOP Renewal Application Form.

Editorial AOP Changes

BP requests that the AOP be updated to reflect updated facility personnel contact information, editorial changes and typo corrections, updated rule effective dates, and other formatting changes, as proposed in the enclosed AOP mark-up.

Summary

BP prepared this AOP renewal application after consulting with NWCAA staff and applicable requirements in NWCAA Regulation Section 322 and WAC 173-401-510. As discussed, this application incorporates new and revised Notice of Construction conditions, provisions from the recently updated Refinery Sector Rule, and editorial revisions. BP anticipates NWCAA and Ecology will finalize OAC and PSD permits for the coker heater replacement project in January 2017. BP will work with NWCAA to incorporate new permit conditions into the AOP renewal.

Closing

Thank you for your attention to this AOP renewal application. Please feel free to call me at 360.599.4712 if you have any questions about this application.

Sincerely,



Scott Inloes
Senior Environmental Engineer

cc: Steve Mrazek



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Title V Air Operating Permit Renewal Application

Please provide the information requested in this application. Please submit to the Northwest Clean Air Agency three paper copies and one electronic copy of the completed application. The certification at the end of this document applies to the entire submittal. If additional room to reply is required, please attach pages to this request.

In some cases, a prior submittal to the NWCAA (e.g., the annual emissions inventory) may include information requested below. If you would like to refer the NWCAA to that information rather than provide the information here, please note this in your response. Any submittal to which the NWCAA is referred will become part of your renewal application. It is also acceptable to attach relevant portions of your current Air Operating Permit if the information therein provides an adequate response to a question below.

Part 1: General Information

- 1) Company name and address [or plant name and address if different from the company name]

BP Cherry Point Refinery
4519 Grandview Road, Blaine, WA

- 2) Current Air Operating Permit number and expiration date

Air Operating Permit #: 015R1M1
Expiration Date: January 15, 2018

- 3) Owner's name and agent

BP West Coast Products LLC

- 4) Responsible Official name and address

Robert K. Allendorfer, Refinery Manager
4519 Grandview Road
Blaine, Washington 98230

- 5) Telephone number and name of plant site manager/contact

Rachel Lewis, HSSEQ Manager

(306) 371-1500

- 6) Were there any changes to the facility impacting air emissions since receiving the current Air Operating Permit? [if yes, please describe changes]

Washington Department of Ecology & NWCAA have issued new/revised PSD and NOC permits for several process units at the refinery. The enclosed AOP mark-up includes new/revised permit conditions that are currently applicable. Draft PSD and NOC permits for replacing the coker heaters are currently open for public comment. BP requests NWCAA incorporate new coker heater permit approval conditions in the new AOP, and retain existing coker heater permit conditions until the heaters are decommissioned (after successful startup of the new heaters).

The Refinery Sector Rule effects certain affected sources subject to NSPS Subpart Ja and NESHAP Subparts CC and UUU. The enclosed AOP mark-up includes new applicable conditions and corresponding compliance dates. Several new applicable conditions will become effective after NWCAA renews the AOP.

Part 2: Process and Emissions Information

- 7) Will there be any changes to the operating scenario(s) identified in the current AOP?

The operating scenarios incorporated into the current AOP are not changing, but Ecology and NWCAA have issued several new/revised permits and EPA has promulgated new regulations that need to be incorporated in the new AOP. The enclosed AOP mark-up includes new applicable conditions.

- 8) Provide a description of process and products by Standard Industrial Classification (SIC) Code. Please list the applicable SIC Code. Please repeat the list of processes and products for each alternative operating scenario.

The current AOP includes an accurate description of refinery processes. The primary SIC Code for the refinery remains 2911 (Petroleum Refining). The refinery also produces calcined coke (SIC Code 2999) and elemental sulfur (SIC Code 2819).

- 9) Please list any and all pollutants that would cause the facility to be classified as a "major source" as defined in WAC 173-401.

CO, NO_x, PM, PM₁₀, PM_{2.5}, SO₂, GHGs, and HAPs.

- 10) Please identify and describe all points of emissions at the facility except those that qualify as insignificant emission units or activities as defined in WAC 173-401-530. Are these emissions units correctly identified and defined in the current AOP? If not, please note the requested changes below.

The refinery emission units are correctly identified and defined in the current AOP with exception of the requested description changes below. The requested changes are incorporated into the enclosed AOP mark-up.

- **Crude and Vacuum Unit**
 - Request Chemical Treater, Equipment Components be moved from "Shipping, Pumping & Receiving" to "Crude and Vacuum Unit"
- **Reformer and Naphtha Units**
 - Request Naphtha HDS Unit, Equipment Components, be described as constructed in 1970 and modified in 2013.
- **Hydrocracker Unit**
- **Delayed Coker Unit**
- **#1 Diesel HDS Unit**
- **#2 Diesel HDS Unit**
- **#3 Diesel HDS Unit**
- **Isomerization Unit**
- **Light Ends and LPG Units**
- **Hydrogen Plants**
- **Calciners and Coke Handling**
- **Boilers and Cooling Towers**
- **Flares and Flare Gas Recovery**
 - Request High Pressure and Low Pressure Flares be described as constructed in 1970 and modified in 2009.
- **Sulfur Recovery Complex**
 - Request Sulfur Pits and Sulfur Tanks be described as modified in 2015.
- **Shipping, Pumping & Receiving**
- **Non-Hazardous Waste Landfarm**
- **Oily Wastewater Collection, Storage and Treatment**
- **Petroleum Storage Tanks/Vessels**
 - Request maximum true vapor pressure (MTVP) for existing tanks be updated to reflect applicable Refinery Sector Rule thresholds.
- **Stationary Internal Combustion Engines**
 - Request change to engine list to include one new emergency engine (38-GEN-01) and remove two emergency engines (91-GEN-EPIJ and 91-GEN-SPARE).

- 11) Please list and quantify all emissions of regulated air pollutants from the emission points identified in item 10 above. Please include calculations. If the most recent annual emissions inventory accurately describes these emissions, it is not necessary to repeat the same information here. Please refer the NWAPA to the most recent annual emissions inventory.

BP refers NWCAA to the most recent BP Cherry Point Refinery emission inventory, submitted to the Washington Emission Inventory Reporting System (WEIRS) on April 12, 2016.

- 12) List the fuels used and their respective usage rates at design capacity for the emission points identified in item 10 above.

The current AOP includes an accurate description of emission unit capacities.

- 13) List the raw materials used and their respective usage rates at design capacity for the emission points identified in item 10 above.

The current AOP includes an accurate description of each emission unit.

- 14) List the production rate at design capacity for the emission points identified in item 10 above.

The current AOP includes an accurate description of each emission unit.

- 15) Identify the facility operating schedule (anticipated operating hours per day, days per week, weeks per year)

The anticipated operations schedule is for continuous operations (24 hours per day, 7 days per week, and 52 weeks per year. 2015 actual operating information included in the WEIRS submittal on April 12, 2016.

- 16) Please identify all air pollution control equipment at the facility. Is this air pollution control equipment correctly identified and defined in the current AOP? If not, please provide information necessary to correct.

The current AOP includes an accurate description of air pollution control equipment at the BP Cherry Point Refinery.

- 17) Please identify and describe all compliance monitoring devices or activities at the facility.

The current AOP includes an accurate description of compliance monitoring devices at the BP Cherry Point Refinery.

- 18) Identify any limitations on source operation that affect emissions of a regulated pollutant. Similarly, list any work practice standards that affect emissions of a regulated pollutant at this facility.

The current AOP includes an accurate description of operating limits and work practice standards at the BP Cherry Point Refinery.

Part 3: Applicable Requirements

- 19) Cite and describe all applicable requirements. An updated copy of the applicable requirements in the current AOP for the facility may be sufficient.

The enclosed AOP mark-up incorporates new applicable requirements. Additional descriptions of new applicable requirements are provided in Item 25 of this AOP Renewal Form.

- 20) Please list any applicable test method(s) for determining compliance with each applicable requirement listed in item 19 above. An updated copy of the current AOP for the facility may be sufficient.

The enclosed AOP mark-up include applicable test methods for new applicable requirements.

- 21) Does the applicant propose any exemptions from an otherwise applicable requirement? If so, please explain.

BP does not propose any exemptions from an otherwise applicable requirement.

- 22) Does the CAM rule (40 CFR part 64) apply to any of the emissions units?

The CAM rule continues to apply to the following emission control devices for the specified pollutants:

- Calciner Hearths 1 & 2 WESP (shared stack): PM₁₀ and H₂SO₄
- Calciner Hearth 3 WESP: PM₁₀ and H₂SO₄
- North and South Coker Charge Heaters Flue Gas Recirculation: NO_x

BP is not proposing changes to the CAM requirements listed in the current AOP. No other emission units at the refinery are subject to the CAM rule.

- 23) Does the accidental release prevention regulation (40 CFR part 68) apply to the facility?

The refinery is subject to 40 CFR Part 68 requirements. BP maintains a Risk Management Plan (RMP) and updates the plan as required.

- 24) Do the federal Acid Rain rules (40 CFR parts 72-78) apply to any of the emissions units?

No

- 25) Are there any requested changes to any condition in the current Air Operating Permit? [if yes, identify the condition, the requested change, and the reason]

BP requests the following permit term revisions in the AOP. The enclosed AOP mark-up incorporates the requested AOP permit term changes.

Administrative Changes

Clarify 40 CFR 60 Subparts J and Ja limit H₂S in fuel gas to 162 ppmv (230 mg/dscm). Several AOP permit terms inadvertently reference "ppmvd" and "mg/dscf".

Remove generally applicable requirements from the Crude and Vacuum Unit (AOP Permit Terms 5.15.24 and 5.15.25), Isomerization Unit (AOP Permit Terms 5.8.3 and 5.8.4), #3 DHDS (AOP Permit Term 5.7.20), #2 Hydrogen Plant (AOP Permit Term 5.10.32), #5 Boiler (AOP Permit Terms 5.12.10 and 5.12.11), and #6 & #7 Boilers (AOP Permit Terms 5.12.35 and 5.12.36) as they are already generally applicable requirements in Section 2 of the AOP.

Remove AOP Permit Term 5.15.45 (Crude Rail Car Unloading Facility MACT for Equipment Leaks) because components are already subject to 40 CFR 60 Subpart GGGa for component leaks. 40 CFR 63.640(p)(2) clarifies that equipment leaks subject to 40 CFR 60 Subpart GGGa are required to only comply with Subpart GGGa requirements.

New and Revised Permits

Update AOP Permit Terms 5.3.7 (1st Stage Reactor Heater NO_x limit), 5.3.23 (1st Stage Fractionator Reboiler NO_x limits), 5.14.2 (Sulfur Recovery Complex SO₂ limit) to reflect Ecology's BART Order 7836, Revision 2 (issued on May 13, 2015).

Incorporate a new AOP permit term for Naphtha HDS components in VOC service requiring compliance with 40 CFR 60 Subpart GGGa (OAC 1141, issued April 22, 2013).

Incorporate a new AOP permit term for Sulfur Plant Incinerator NO_x and CO emission limits, update sulfur pit maintenance requirements, and update applicable H₂S limits from NSPS Subpart J to NSPS Subpart Ja (OAC 1201a issued April 16, 2015).

Update AOP permit term 5.12.24 to include PM₁₀ emission limits for Boilers 6 and 7 (PSD-07-01 Amendment 2, issued February 24, 2016).

Requested MRRR Gapfilling Changes

Revise the directly enforceable MRRR for AOP Permit Terms 5.2.29 and 5.2.30 (#2 Reformer NO_x and CO Limits) to allow for testing once every five years. The previous three source tests indicate NO_x and CO emissions are less than 50 percent and 1 percent of respective emission limits. BP requests the source testing frequency change from once every two years to once every five years based on measured NO_x and CO emissions well below applicable emission limits during the past three source tests.

Revise the directly enforceable MRRR for AOP Permit Term 5.11.11 (#3 Calciner scrubber SO₂ control efficiency) to incorporate existing CAM plan requirements for H₂SO₄ and PM₁₀. The current gapfilling MRRR requires BP conduct an annual source test of the scrubber inlet and outlet SO₂ concentrations to confirm SO₂ control efficiency of greater than or equal to 90 percent. Testing results from the past five years confirms a minimum scrubber efficiency of 95 percent. BP operates an SO₂ continuous emission monitor on the scrubber outlet and follows a rigorous CAM plan to monitor and document proper scrubber operation for H₂SO₄ and PM₁₀ emissions. BP requests that NWCAA update the gapfilling MRRR in AOP Permit Term 5.11.11 to reference existing CAM requirements in AOP permit terms 5.11.6 and 5.11.7.

Revise the directly enforceable MRRR for AOP Permit Term 5.15.15 (Transport tank pressure limits during filling) to allow for pressure safety valves to be used instead of direct measurements during testing. BP proposes to maintain pressure safety valves at or below 18 inches of water to ensure this applicable requirements is met on a continuous basis.

New Regulations

BP requests that the AOP be updated to incorporate provisions from the recently updated Refinery Sector Rule, NSPS Subpart Ja and NESHAP Subparts CC and UUU. Relevant changes in the updated rules apply to startup, shutdown and malfunction provisions to ensure that the subparts are consistent with the court decision in *Sierra Club v. EPA*, 551 F. 3d 1019 (D.C. Cir. 2008), pressure relief devices, maintenance vents, flares, tanks, marine loading operations, sulfur recovery units, delayed coker units, catalytic reforming units, electronic reporting requirements, and establishing benzene fence-line monitoring programs. The following sections summarize the provisions to be incorporated into the renewed AOP.

BP requests that the AOP be updated to reflect changes to the General Provisions cross-reference tables, specifically, NESHAP Subparts CC and UUU no longer reference the general duty requirements in 40 CFR 63 Subpart A and no longer require startup, shutdown and malfunction plans.

BP requests that the AOP be updated to incorporate new provisions from Subpart CC for equipment leaks that require that on and after January 30, 2019, owners and operators must establish preventative measures for each pressure relief device, monitor for pressure release events, estimate and report the quantity of organic HAP released, and perform root cause analysis and corrective action analysis for each event as discussed in 40 CFR 63.648(j).

BP requests that the AOP be updated to incorporate new provisions from Subpart CC for maintenance vents. Subpart CC provides that a process vent may be designated as maintenance vent if the vent is only used as a result of startup, shutdown, maintenance, or inspection of equipment where equipment is emptied, depressurized, degassed or placed into service in accordance with 40 CFR 63.643(c). If applicable, vents must be designated as maintenance compliance on and after August 1, 2017, unless an extension is requested pursuant to 40 CFR 63.6(i). Prior to August 1, 2017, or the extended compliance date, during maintenance venting events, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.

BP requests that the AOP be updated to incorporate provisions from Subpart UUU for controlling emissions from active purging and depressuring of catalytic reforming units. However, the control requirements do not apply to the coke burn-off, catalyst rejuvenation, reduction or activation vents, or to the control systems used for these vents. Further, the limits do not apply to emissions from process vents during passive depressuring when the reactor vent pressure is 5 pounds per square inch gauge (psig) or less or during active depressuring or purging prior to January 30, 2019, when the reactor vent pressure is 5 psig or less. On and after January 30, 2019, the emission limitations apply during active purging operations (when nitrogen or other purge gas is actively introduced to the reactor vessel) or active depressuring (using a vacuum pump, ejector system, or similar device) regardless of the reactor vent pressure.

BP requests that the AOP be updated to incorporate provisions from Subpart CC that apply to existing delayed coker unit decoking operations. Subpart CC requires that each coke drum be depressured to a closed blowdown system until the coke drum pressure is 2 psig determined on a rolling 60-event average.

Requirements related to flares have been updated in both Subparts CC and UUU. The new rules have been updated to replace cross-references to the General Provisions requirements at 40 CFR 63.11(b) with flare operational requirements and emergency provisions that are written directly into the rules. Owners or operators are required to comply with the new operating and monitoring requirements for existing flares no later than January 30, 2019, unless an extension is requested pursuant to 40 CFR 63.6(i). BP requests that the AOP retain current flare operational requirements and be updated to require that flares comply with the provisions in 40 CFR 63.670 on and after January 30, 2019.

BP requests the AOP be updated to incorporate new startup and shutdown provisions from Subpart UUU for sulfur recovery units (SRUs). Subpart UUU and NSPS Subpart Ja provide the same three compliance options for SRU startup and shutdown periods in 40 CFR 63.1568(4) and 40 CFR 60.102a(f)(1), including:

- Complying with existing SO₂ emission limit: 250 part per million by volume, dry basis, (ppmdv) corrected to zero percent oxygen on a 12-hour rolling average;
- Send startup and shutdown purge gases to a flare; or
- Sent startup and shutdown gases to a thermal oxidizer or incinerator: minimum hourly average firebox temperature of 1,200 Fahrenheit and a minimum hourly average exhaust oxygen concentration of 2 percent by volume, dry basis.

BP requests the flexibility to comply with any of the three options during startup and shutdown. Short-term and long-term emission limits remain unchanged for normal operating conditions.

BP requests that the AOP be updated to incorporate marine loading submerged fill requirements of 40 CFR 153.282 that now apply to existing sources with emissions less than 10 and 25 tons per year.

The new Subpart CC revised the definition of Group 1 storage vessels to include storage vessels with capacities greater than or equal to 20,000 gallons but less than 40,000 gallons if the maximum true vapor pressure is 1.0 pound per square inch absolute (psia) or greater and to include storage tanks greater than 40,000 gallons if the maximum true vapor pressure is 0.75 psia or greater. However, the new definition does not affect the classification of any Group 1 and Group 2 storage tanks at the facility. In regard to storage tank requirements, BP requests that the AOP be updated to incorporate cross-references to the generic storage vessel requirements in 40 CFR Part 63 Subpart WW, including requirements for guide pole controls and other fittings as well as inspection requirements.

BP requests that the AOP be updated to incorporate benzene fence line monitoring work practice standards. Subpart CC requires that on and after January 30, 2018, owners and operators conduct benzene sampling along the facility property boundary and analyze the samples. Root cause analysis and corrective action is required if sample results exceed an action level of 9 micrograms per cubic meter. Other provisions include reduced monitoring for monitors with consistently low fence line concentrations; requirements for alternatives to passive monitoring; monitor placement guidance; and quarterly reporting requirements.

Finally, BP requests that the AOP be updated to reflect new Washington GHG Clean Air Rule (WAC 173-442) after Ecology has issued a regulatory order containing BP's baseline GHG emissions and GHG emission reduction pathway.

- 26) If the applicant would like to request that the permit shield be extended to cover certain requirements that the applicant believes are inapplicable, please list those requirements, below. Please include a brief narrative description of each requirement and the basis for the belief that each is inapplicable.

Section 7 of the current AOP includes a summary of inapplicable requirements. BP requests to retain the current list of inapplicable requirements with the following two changes.

BP requests that WAC 173-485 be included in the AOP Section 7 list of inapplicable requirements because this regulation imposed a one-time requirement to demonstrate compliance with an energy efficiency standard set forth in WAC 173-485-040. The refinery satisfied that requirement by submitting a report to NWCAA on September 29, 2014 containing the one time certification required by WAC 173-485-050.

BP requests 40 CFR 60 Subpart NNN (SOCMI Distillation Operations) and Subpart RRR (SOCMI Reactor Processes) be removed from the AOP Section 7 list. The proposed coker heater replacement project includes a lean oil absorption system that will trigger Subpart NNN requirements. At the time Subpart NNN becomes applicable, BP will also voluntarily comply with Subpart RRR requirements.

Part 4: Compliance Status and Certification

- 27) Describe the compliance status of the facility with regard to all applicable requirements. Compliance status for each applicable requirement shall be described as "continuous" or "intermittent". Please include the method used for determining compliance. If an annual

compliance certification has been recently submitted to the NWAPA, the applicant may reference this report. However, if the applicable requirements or compliance status have changed since that submittal, an updated submittal is required.

BP submitted their 2015 annual compliance certification on February 24, 2016, and BP will submit their 2016 annual compliance certification by February 28, 2017.

28) Provide the following:

- a) For applicable requirements with which the source is in compliance, provide a statement that the source will continue to comply with such requirements;
For applicable requirements with which the source is in compliance, BP will continue to comply with such requirements.
- b) For applicable requirements that become effective during the permit term, provide a statement that the source will meet such requirements on a timely basis;
BP will meet applicable requirements that become effective during the permit term on a timely basis.
- c) For applicable requirements with which the source is not in compliance at the time of permit issuance, provide a narrative description and provide a schedule of compliance. Such a schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source will be in noncompliance at the time of permit issuance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based;

BP is currently in compliance with all applicable requirements.

- d) For sources required to have a schedule of compliance to remedy a violation, provide a schedule for submission of certified progress reports every six months or at a more frequent period if specified in an applicable requirement; and

BP is currently in compliance with all applicable requirements.

Statement of Certification: *Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.*

<u>Robert K. Allendorfer</u>	<u>Refinery Manager</u>
Name of designated responsible official	Title of responsible official
	13 JAN 17
Signature of responsible official	Date