

**Northwest Clean Air Agency (NWCAA) hereby issues  
Order of Approval to Construct (OAC) 305b**

**Project Summary:** Construct and operate the #2 Reformer Unit to improve the octane of gasoline blending components to meet the federally mandated phase out of tetra-ethyl lead.

**Approved Emission Units:**

- Process equipment associated with the #2 Reformer Unit
- #2 Reformer Heater (340 MMBtu/hour nominal heat input capacity)

<b>Owner/Operator</b>	<b>Facility Name and Location</b>
BP Products North America Inc. BP Cherry Point Refinery 4519 Grandview Road Blaine, WA 98230  Contact: Sahil Patel, Environmental Engineer	BP Cherry Point Refinery 4519 Grandview Road Blaine, WA 98230

**Permit History**

- As of the date of issuance, this Order supersedes NWCAA OAC 305a, issued May 3, 2012.

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 J - 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 after January 4, 1983 and on or before November 7, 2006
- 40 CFR 60 Subpart QQQ – Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems

**National Emission Standards for Hazardous Air Pollutants (NESHAP)**

- 40 CFR 63 Subpart A – General Provisions
- 40 CFR 63 Subpart CC – National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries
- 40 CFR 63 Subpart UUU – National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic Reforming Units, and Sulfur Recovery Units

- 40 CFR 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

**Issuance of this Order is authorized by Northwest Clean Air Agency Regulation Section 300. The Owner/Operator must comply with the following restrictions and conditions<sup>1</sup>:**

- (1) The #2 Reformer Heater shall not exceed 340 MMBtu/hour, higher heating value (HHV).
- (2) Hydrogen sulfide (H<sub>2</sub>S) in the fuel gas combusted in the #2 Reformer shall not exceed any of the following limits:
  - (A) 162 ppm for any three-hour average, and
  - (B) 50 ppm based on a 24-hour rolling average.

Continuous compliance with this condition shall be demonstrated by operating a certified continuous emission monitoring system (CEMS) for H<sub>2</sub>S in the fuel gas combusted in the #2 Reformer Heater. The CEMS shall be installed, calibrated, maintained, and operated in accordance with the appropriate specifications of 40 CFR 60 Appendices B and F, and NWCAA Section 367 and Appendix A.

- (3) Visual emissions from the #2 Reformer Heater shall not exceed five percent opacity for more than three minutes in any consecutive 60-minute period as determined by Washington State Department of Ecology Method 9A.
- (4) The #2 Reformer Heater shall combust only gaseous fuels.

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Robyn Jones, E.I.T.  
Environmental Engineer

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Agata McIntyre, P.E.  
Engineering Manager

Revision a: Reformat for AOP cleanup.

Revision b: Revise the 160 ppm H<sub>2</sub>S, 3-hour average limit to 162 ppm H<sub>2</sub>S, 3-hour average.  
Revise the 90 ppm H<sub>2</sub>S calendar month average limit to 50 ppm, 24-hour average.

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<sup>1</sup> 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.