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# Title V Air Operating Permit Renewal Application

The information requested in this document must be provided for a complete application. Please submit to the Northwest Clean Air Agency (NWCAA) one paper copy 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]

Phillips 66 Company Ferndale Refinery  
 PO Box 8  
 Ferndale, WA 98248-0008

- 2) Current Air Operating Permit number and expiration date

Air Operating Permit 016R2  
 Expires: January 1, 2023

- 3) Owner's name and agent

Same as above

- 4) Responsible Official name and address

Carl P. Perkins  
 General Manager  
 PO Box 8  
 Ferndale, WA 98248-0008

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

Carl P. Perkins  
 360-384-8343

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

No

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**Part 2: Process and Emissions Information**

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

No

- 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.

SIC 2911

Please see AOP for information pertaining to processes and products.

- 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.

Criteria Pollutant Emissions from 2020 Emissions Inventory (>100 tons emitted):

CO: 140 tons

NOx: 603 tons

VOC: 785 tons

- 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.

Please see attached.

- 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.

Please refer to 2020 Emissions Inventory submitted via WEIRS on 4/14/2021.

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

Current AOP includes accurate description of each emission point.

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

Current AOP includes accurate description of each emission point.

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

Current AOP includes accurate description of each emission point.

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

The refinery operates 24 hours per day, 7 days per week, 365 days per year. For actual operating information for 2020 please refer to 2020 Emissions Inventory submitted via WEIRS on 4/14/2021.

- 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 accurate descriptions of all air pollution control equipment.

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

The current AOP includes accurate descriptions of all compliance monitoring devices or activities.

- 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.

There are currently no limitations on source operation or any work practice standards that would affect emissions at this time.

### **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 current AOP includes accurate citations and descriptions of all applicable requirements.

- 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 current AOP contains accurate information pertaining to any applicable test method(s) for compliance determination.

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

Phillips 66 has two existing EPA-approved Alternative Monitoring Plans (AMPs) for Truck Loading Rack sulfur and Wet Gas Scrubber (WGS) particulate monitoring.

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

The CAM Rule is applicable to the Truck Loading Rack and is referenced in Table 2-6 of the Statement of Basis.

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

Yes and the Risk Management Plan is updated 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]

No

- 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.

None requested.

**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 NWCAA, the applicant may reference this report. However, if the applicable requirements or compliance status have changed since that submittal, an updated submittal is required.

The 2020 Annual Compliance Certification was submitted to NWCAA on 1/28/2021.

- 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;

Phillips 66 will continue to comply with all applicable 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;

Phillips 66 will comply with applicable requirements that become effective during the permit term in a timely manner.

- 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;

Phillips 66 is in compliance with all current 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

|   |                               |
|---|-------------------------------|
| <b>Statement of Certification:</b> <i>Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.</i> |                               |
| <u>CARL P. PERKINS</u>  | <u>GENERAL MANAGER</u>        |
| Name of designated responsible official   | Title of responsible official |
| <u>Carl P. Perkins</u>  | <u>12/09/2021</u>             |
| Signature of responsible official   | Date                          |

Item 10 Attachment

| REFINERY EMISSION POINTS                            |                 |
|---|-----------------|
| Source  | ID#             |
| Crude Heater  | 1F-1            |
| #2 Crude Heater                                     | 1F-1A           |
| Vacuum Flasher Heater                               | 4F-2            |
| Alkylation Heater                                   | 17F-1           |
| Tier III/LSR Heater                                 | 41F-1*          |
| #3 Pretreater Heater                                | 18F-1           |
| #3 Reformer Heater                                  | 18F-21          |
| #3 Reformer Heater                                  | 18F-23          |
| DHT Heater  | 33F-1           |
| Szorb Heater  | 38F-100         |
| SRU #1 Incinerator                                  | 19F-21          |
| SRU #2 Incinerator                                  | 39F-0104        |
| Flue Gas Scrubber                                   | 4F-100 & 4F-101 |
| #1 Boiler   | 22F-1C          |
| #2 Boiler   | 22F-1A          |
| #3 Boiler   | 22F-1B          |
| #4 Boiler   | 22F-1E          |
| Elevated Flare                                      | 13V-11          |
| Truck Gasoline Loading Rack<br>with Vapor Combustor | 11V-11          |

\*ID # to be added to permit