



# **STATE IMPLEMENTATION PLAN**

**Site Specific Revision  
To 15% Rate of Progress Plan**

**December 20, 1997**

1D# 5069

**Submitted to:**

**EPA Region 6  
1445 Ross Avenue, 12th Floor  
Dallas, Texas 75202-2733**



M. J. "MIKE" FOSTER, JR.  
GOVERNOR

State of Louisiana

OFFICE OF THE GOVERNOR

Baton Rouge

70804-9004

POST OFFICE BOX 94004  
(504) 342-7015

December 20, 1997

Mr. Jerry Clifford  
Acting Administrator  
U.S. Environmental Protection  
Agency  
1445 Ross Avenue, Suite 1300  
Dallas, TX 75202

Dear Mr. Clifford:

The State of Louisiana has approved and is submitting a site-specific revision to the 15% Rate of Progress State Implementation Plan (SIP). The revision will provide for a schedule extension for installation of guide pole sliding cover gaskets on 33 external floating roof tanks at Exxon Company, U.S.A. Reviews by the Louisiana Department of Environmental Quality (LDEQ) and the U.S. Environmental Protection Agency, Region 6, have determined that the delay in installation of these controls has no significant impact on the volatile organic compound (VOC) reduction requirement in the SIP.

Please contact the LDEQ's Air Quality staff through Gus Von Bodungen, Assistant Secretary, at (504) 765-0102 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Foster".

M.J. "Mike" Foster, Jr.

ps

Attachment

c: Mr. Thomas Diggs, EPA Region 6

# 5069

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**SUMMARY OF 15% RATE OF PROGRESS (ROP) STATE IMPLEMENTATION PLAN  
(SIP) REVISION**

**Background**

The current approved 15% ROP SIP demonstrates the State's ability to reduce VOC emissions in the Baton Rouge serious ozone nonattainment area by 15% by 1996, as mandated by the 1990 Clean Air Act Amendments, Section 182(b)(1). The State's demonstration included VOC emission reductions from controls to be installed on external floating roof tanks, as required by LAC 33:III 2103.D.4. The total emission reductions from the 125 affected tanks was 7.9 tons per day, including 7.4 tons per day from Exxon. The guide pole tank controls were to be in operation before November 1996.

**Control Installation Extension**

In a letter dated November 13, 1996 (page 19), Exxon Company, U.S.A. requested an extension of the compliance date for the installation of controls on thirty-four floating roof tanks on the basis that the tanks must be removed from service to install the controls. Exxon requested approval to install the controls on these tanks at the next scheduled downtime. The Louisiana Department of Environmental Quality (LDEQ) requested supplemental information from Exxon, which was provided in letters dated May 14, 1997 (page 16) and July 3, 1997 (page 7), and which updated the extension request to include only thirty-three tanks.

Exxon calculated that gasketing the thirty-three tanks would reduce VOC emissions 12 tons per year annually. Units must be out of service in order to install the required controls. To remove the tanks from service (requiring degassing) to install the gaskets in compliance with the November 1996 requirement would have increased total emissions by 100 tons during the installation period. It is more beneficial to temporarily defer the 12 ton per year emission reduction rather than adhere to the November 1996 installation schedule which would result in 100 tons of additional emission in a compressed timeframe. Since 1994, the Exxon Baton Rouge Refinery has reduced total VOC emissions by 3,703 tons per year as reported on annual EIS reports to the LDEQ. Of this reduction, 2,502 tons per year resulted from decreased emissions from Refinery tankage.

The extension requested by Exxon will have no significant impact on the VOC reduction requirement in the ROP SIP. Reductions demonstrated in the 15% ROP SIP and the Post 1996 and Attainment Demonstration SIP exceed required reductions by 1.4 tons per day. DEQ's review determined that Exxon's calculations are correct and that the request is in compliance with extension provisions allowed by LAC 33:III 2103.D.4.c.

In letters dated July 17 (page 5) and September 12, 1997 (page 4), LDEQ notified Exxon of LDEQ's approval and of the necessity and procedure to obtain joint approval by EPA. LAC 33:III 2103.D.4.c provides that both EPA and DEQ must approve the installation extension. EPA Region 6 has agreed to approve the extension as a site specific SIP revision to the 15% ROP SIP.

**Submittal Request**

LDEQ requests that EPA Region 6 review the documentation contained herein, and approve Exxon's request for extension based on a completion date for all controls required by 2103.D.4 by December 2005.

**Compliance with 40 CFR 51.102 (a) through (d) (5)**

The public hearing requirements of 40 CFR 51.102 (a) through (d)(5) for SIP revision adoption are scheduled. Advertisement of the SIP revision has been requested (page 27) and will appear in the Louisiana Register on September 20, 1997 (page 28); and in the official State journal, the Advocate. The public hearing is scheduled for October 30, 1997, with the comment period ending November 6, 1997. The proposed revision is available for viewing at LDEQ Headquarters and the Capitol Regional Office in Baton Rouge; and at the Louisiana State depositories in Baton Rouge (LSU and 3rd Street).

APPENDIX A

LDEQ and Exxon Correspondence



State of Louisiana  
Department of Environmental Quality



M.J. "MIKE" FOSTER, JR.  
GOVERNOR

J. DALE GIVENS  
SECRETARY

September 12, 1997

Mr. Michael S. McWilliams  
Environmental Coordinator  
Exxon Company, U.S.A.  
P.O. Box 551

Dear Mr. McWilliams:

- The purpose of this letter is to clarify the approval given in the July 17, 1997, letter as to the required completion date for the requested schedule extension for installation of sliding cover gaskets on 33 external floating roof tanks. The approval given is contingent on a December 2005 completion date for all required gasket installations, and on EPA approval of the State's revision to the 15% Rate of Progress State Implementation Plan (SIP).

The SIP revision submitting the schedule extension will be noticed in the September 20, 1997, Louisiana Register, and will be scheduled for a public hearing and comment period.

Please contact Mr. Bennett Farrier at (504) 765-0148 if you have any questions.

Sincerely,

*Harold Schlige, Deputy Secretary*

*for* Gustave Von Bodungen, P.E.  
Assistant Secretary

GVB/BHF/ps

cc: Kerry Hawkins, Exxon Company

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State of Louisiana  
Department of Environmental Quality



M.J. "MIKE" FOSTER, JR.  
GOVERNOR

July 17, 1997

J. DALE GIVENS  
SECRETARY

Mr. Michael S. McWilliams  
Environmental Coordinator  
Exxon Company, U.S.A.  
P.O. Box 551  
Baton Rouge, LA 70821-0551

Dear Mr. McWilliams:

We have reviewed your request for a schedule extension to install certain external tank fitting controls as required by our tankage regulations (LAC 33:111 2103.D.4.a.). The original request was dated November 13, 1996 and supplemental information was furnished by letter dated May 14, 1997.

The specific request was a schedule extension for installation of guide pole sliding cover gaskets on 33 external floating roof tanks. The basis for the request was that these 33 tanks had welded rather than bolted brackets on the sliding cover rollers. Hot work requiring removal of the tanks from service would be required to install gaskets on these tanks.

Our tankage regulation has a provision for compliance schedule extensions when installation of tank controls requires removal of tanks from service. Approval is necessary by the "administrative authority\*", meaning DEQ and EPA. The DEQ reviewed your request and approves the request for a schedule extension based on the following:

1. Exxon calculated that gasketing would reduce VOC emissions 12 tons per year and that emissions from degassing 33 tanks will exceed 100 tons per year. DEQ reviewed and agrees with the calculations.

2. Total VOC emission reductions from tank controls installed by Exxon are approximately 2,500 tons per year. The gaskets are a small part of the total and have no significant impact on the VOC reduction requirement in our SIP.

We contacted Region VI for their approval and were advised that the proper procedure was to submit the schedule extension as a site specific SIP revision. Based on the reasons for the request, Region VI will approve the schedule extension as a SIP revision. The SIP revision will then have to be noticed in the Federal Register to become part of the SIP.

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Mr. Michael S. McWilliams  
Exxon Company, U.S.A.  
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We plan to initiate the SIP revision process this month and anticipate submittal to Region VI in October. Region VI anticipates that the SIP revision should be finalized as part of the SIP by mid 1998.

If you have any questions please contact me at (504) 765-0219.

Sincerely,



Gustave Von Bodungen, P.E.  
Assistant Secretary

GVB/BHF/rms

cc: Kerry Hawkins, Exxon Company

**EXXON** COMPANY, U.S.A.

POST OFFICE BOX 551 • BATON ROUGE, LOUISIANA 70821-0551

REFINING DEPARTMENT  
BATON ROUGE REFINERY

July 3, 1997

Mr. Gustave Von Bodungen, Assistant Secretary  
Office of Air Quality and Radiation Protection  
Louisiana Department of Environmental Quality  
P.O. Box 82135  
Baton Rouge, Louisiana 70884-2135

Re: EFR Retrofit Schedule Extension

Dear Mr. Von Bodungen:

Attention: Mr. Bennett H. Farrier, P. E.

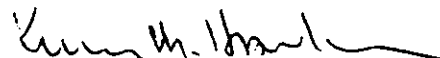
Per our recent discussion regarding our EFR Retrofit extension, I have provided the additional information you requested to support of our request a schedule extension for floating roof fitting retrofits. Updated Tables 1-3 provide the latest status information on our external floating roof tanks. There are 33 incomplete tanks, 40 completed tanks (some with a sleeve in addition to the other controls) and 23 tanks that are not subject to the rule due to product stored or being out of service. As indicated in our recent conversation, we now have only 96 external floating roof tanks.

I have also provided you the calculation back-up for the emissions calculations. These calculations show how we calculated the losses attributable to the tanks without the sliding cover gaskets.

Since the fitting configuration categories in API 19.2 and AP42 do not provide factors for the case of the missing sliding cover gasket with all the other controls in place, we assumed that the missing sliding cover gasket would have emissions equivalent to a standard unbolted, ungasketed access hatch. Consequently, we added one unbolted, ungasketed access hatch to each of the tanks and calculated the emissions for the total of the tanks.

If you have further questions, please give me a call at (504) 359-7809.

Very truly yours,

  
Kerry M. Hawkins, P.E.

g:\brr\_env\air\assure\tanks\2103F2.doc  
Airfile 1.7.01.97.003

Enclosures:

c: Dr. Sergudi Mani, LDEQ Capital Regional Office

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**Table 1 -EFR Tanks-Fitting Controls Not Complete**

N/A-Not Applicable Y-Yes, Fitting Controls Installation Complete N-No, Fitting Controls Installation Not Complete

Area	Source id	Comment	Guide pole float w/wiper	Sliding Cover Gasket	Pole wiper seal	Pole Sleeve
Anchorage	T1501	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1502	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1503	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1504	WELDED ROLLERS	N/A	N	Y	N/A
Anchorage	T1505	WELDED ROLLERS	N/A	N	Y	N/A
Anchorage	T1506	WELDED ROLLERS	N/A	N	Y	N/A
Anchorage	T1516	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1517	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1520	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1523	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1525	WELDED ROLLERS	N/A	N	Y	N/A
Anchorage	T1536	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1538	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1539	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1540	WELDED ROLLERS	Y	N	Y	N
East	T0188	WELDED ROLLERS	N/A	N	Y	N/A
East	T0770	WELDED ROLLERS/	Y	N	Y	N
Knox	T0698	WELDED ROLLERS	Y	N	Y	N
Knox	T0702	WELDED ROLLERS	Y	N	Y	N
Knox	T0708	WELDED ROLLERS	Y	N	Y	N
Knox	T0720	WELDED ROLLERS	Y	N	Y	N
Knox	T0733	WELDED ROLLERS	Y	N	Y	N
Knox	T0741	WELDED ROLLERS	Y	N	Y	N
Knox	T0746	WELDED ROLLERS	Y	N	Y	N

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Area	Source id	Comment	Guide pole float w/wiper	Sliding Cover Gasket	Pole wiper seal	Pole Sleeve
Knox	T0753	WELDED ROLLERS/	Y	N	Y	N
Knox	T0766	WELDED ROLLERS	Y	N	Y	N
Knox	T0773	WELDED ROLLERS	Y	N	Y	N
Knox	T0780	WELDED ROLLERS/	Y	N	Y	N
Knox	T0785	WELDED ROLLERS	Y	N	Y	N
Knox	T0786	WELDED ROLLERS	Y	N	Y	N
Knox	T0787	WELDED ROLLERS	Y	N	Y	N
Knox	T0797	WELDED ROLLERS	Y	N	Y	N
South	T0033	WELDED ROLLERS	Y	N	Y	N

**Table 2-EFR Tanks-Fitting Controls Complete**

N/A-Not Applicable Y-Yes, Fitting Controls Installation Complete N-No, Fitting Controls Installation Not Complete

Area	Source id	Comment	Guide pole float w/wiper	Sliding Cover Gasket	Pole wiper seal	Pole Sleeve
Anchorage	T1531	SLEEVE-8"	Y	Y	Y	Y
Anchorage	T1537	SLEEVE-8"	Y	Y	Y	Y
East	T0189	SLEEVE-8"	Y	Y	Y	Y
East	T0190	SLEEVE-8"	Y	Y	Y	Y
East	T0192		N/A	Y	Y	N/A
East	T0194		N/A	Y	Y	N
East	T0195	SLEEVE-8"	Y	Y	Y	Y
East	T0777		N/A	Y	Y	N
Knox	T0198		N/A	Y	Y	N/A
Knox	T0199		N/A	Y	Y	N/A
Knox	T0655		N	Y	Y	Y
Knox	T0701	SLEEVE-8"	Y	Y	Y	Y
Knox	T0703	SLEEVE-8"	Y	Y	Y	Y
Knox	T0710	SLEEVE-8"	Y	Y	Y	Y
Knox	T0722	COMPLETE	N/A	Y	Y	N/A
Knox	T0724	MACT RETROFIT	N/A	Y	Y	N/A
Knox	T0725	ENRAF	Y	Y	Y	N
Knox	T0727	SLEEVE-8"	Y	Y	Y	Y
Knox	T0728		Y	Y	Y	N/A
Knox	T0729		Y	Y	Y	N/A
Knox	T0730	ENRAF	Y	Y	Y	N
Knox	T0731		N/A	Y	Y	N/A
Knox	T0732		N/A	Y	Y	N/A
Knox	T0738	SLEEVE-8"	Y	Y	Y	Y

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**Table 3 -EFR Tanks Exempt From Fitting Control Requirements**

N/A-Not Applicable Y-Yes, Fitting Controls Installation Complete N-No, Fitting Controls Installation Not Complete

Area	Source id	Comment	Guide pole float w/wiper	Sliding Cover Gasket	Pole wiper seal	Pole Sleeve
Anchorage	T1528	N/A-OUS	N	N	N	N
East	T0197	N/A-OUS	N/A	N	N	N
Knox	T0864	N/A OUS-	N	Y	Y	Y
Maryland	T1006	N/A-OUS	N	N	N	N
Maryland	T1007	N/A-OUS	N	N	N	N
Maryland	T1024	N/A-OUS	N	N	N	N
Maryland	T1025	N/A-OUS	N	N	N	N
Maryland	T1035	N/A-OUS	N	N	N	N
South	T0060	N/A-OUS	N	N	N	N
South	T0071	N/A-OUS	N	N	N	N
South	T0130	N/A-<TVP	Y	Y	Y	N
South	T0131	N/A-<TVP	Y	Y	Y	N
South	T0133	N/A-OUS	N	N	N	N
South	T0402	N/A-<TVP	N	N	N	N
South	T0403	N/A-<TVP	N	N	N	N
South	T0404	N/A-<TVP	N	N	N	N
South	T0405	N/A-<TVP	N	N	N	N
South	T0406	N/A-OUS	N	N	N	N
South	T0407	N/A-<TVP	N	N	N	N
South	T0408	N/A-<TVP	N	N	N	N
South	T0419	N/A-<TVP	Y	Y	Y	N
South	T0461	N/A-<TVP	Y	Y	Y	N
South	T0919	N/A-OUS	N	N	N	N

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## Fitting Losses with Extra Access Hatch, Unbolted Cover, Ungasketed

Total emission are 11.31 tpy, same results as Access database.

Pa	(psia)	14.7
Kfa	(lb-mol/yr)	36
Kfb	(lb-mol/(mph)m-yr)	5.9
m	(—)	1.2
Kv	(—)	0.7
V	(mph)	7.6
Kf	(lb-mol/yr)	79.85

Tank	Pva (psia)	P* (—)	Mv (lb/lb-mol)	Kc (—)	Nf (—)	Ff (lb-mol/yr)	Lf (lbs/yr)	Stored Hydrocarbon	
T0033	8.8	0.224	80	1	1	79.85	1433.06	MOGAS/MOGAS COMPONENT	
T0188	8	0.194	50	0.4	1	79.85	309.72	CRUDE	
T0698	8.8	0.224	80	1	1	79.85	1433.06	MOGAS/MOGAS COMPONENT	
T0702	8.8	0.224	66	1	1	79.85	1182.27	MOGAS/MOGAS COMPONENT	
T0708	8.8	0.224	80	1	1	79.85	1433.06	MOGAS/MOGAS COMPONENT	
T0720	8.8	0.224	66	1	1	79.85	1182.27	MOGAS/MOGAS COMPONENT	
T0733	7.4	0.173	68	1	1	79.85	940.57	MOGAS/MOGAS COMPONENT	
T0741	8.8	0.224	66	1	1	79.85	1182.27	MOGAS/MOGAS COMPONENT	
T0746	8.8	0.224	66	1	1	79.85	1182.27	MOGAS/MOGAS COMPONENT	
T0753	8.8	0.224	66	1	1	79.85	1182.27	MOGAS/MOGAS COMPONENT	
T0766	7.4	0.173	68	1	1	79.85	940.57	MOGAS/MOGAS COMPONENT	
T0770	7.4	0.173	190	1	1	79.85	2628.06	NAPHTHA	
T0773	7.4	0.173	68	1	1	79.85	940.57	MOGAS/MOGAS COMPONENT	
T0780	7.4	0.173	68	1	1	79.85	940.57	MOGAS/MOGAS COMPONENT	
T0785	6.2	0.136	68	1	1	79.85	738.95	MOGAS/MOGAS COMPONENT	
T0786	7.4	0.173	68	1	1	79.85	940.57	MOGAS/MOGAS COMPONENT	
T0787	7.4	0.173	68	1	1	79.85	940.57	MOGAS/MOGAS COMPONENT	
T0797	8.8	0.224	66	1	1	79.85	1182.27	MOGAS/MOGAS COMPONENT	
T1501	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1502	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1503	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1504	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1505	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1506	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1516	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1517	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1520	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1523	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1525	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1536	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1538	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1539	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
T1540	4	0.079	50	0.4	1	79.85	126.53	CRUDE	
Total							22610.94	(lbs/yr)	
							11.31	(tpy)	

$$L_F = F_F P^* M_V K_C$$

$$P^* = \frac{\left(\frac{P_{VA}}{P_A}\right)}{\left[1 + \left(1 - \frac{P_{VA}}{P_A}\right)^{1/2}\right]^2}$$

$$P_{VA} = TVP$$

$$P_A = 14.7 \text{ psia}$$

$M_V$  = MOLECULAR WEIGHT OF PRODUCT VAPOR

$K_C$  = PRODUCT FACTOR;  $K_C = 0.4$  FOR CRUDE,  $K_C = 1$  ALL OTHER ORGANIC LIQUIDS

$$F_F = N_F \cdot K_F$$

$N_F$  = NUMBER OF FITTINGS

$$K_F = K_{Fa} + K_{Fb} (K_v v)^m$$

$K_v = 0.7$  FOR EFR

$v$  = AVERAGE AMBIENT WIND SPEED = 7.6 mph FOR BATON ROUGE, LA

$$K_{Fa} = 36$$

$$K_{Fb} = 5.9$$

$$m = 1.2$$

} From Table 7.1-12 FOR ACCESS HATCH, UNINSULATED COVER,  
UNOBTURATED





$$L_F = F_F P^x M_V K_C$$

$$P^x = \frac{\left(\frac{P_{VA}}{P_A}\right)}{\left[1 + \left(1 - \frac{P_{VA}}{P_A}\right) 0.5\right]^2} = \frac{\left(\frac{8.8}{14.7}\right)}{\left[1 + \left(1 - \frac{8.8}{14.7}\right)^{1/2}\right]^2} = 0.22434$$

$$\frac{P_{VA}}{P_A} = \frac{8.8 \text{ psia}}{14.7 \text{ psia}}$$

$$M_V = 80 \frac{\text{lb}}{\text{lb-mol}}$$

$$K_C = 1.0$$

$$F_F = N_F \cdot K_F = 1.0 \cdot 79.85 \left(\frac{\text{lb-mol}}{\text{yr}}\right) = 79.85 \frac{\text{lb-mol}}{\text{yr}}$$

$$N_F = 1.0 \text{ (---)}$$

$$K_F = K_{F_0} + K_{C_0} (K_V V)^m = 36 + 5.9 (0.7 \cdot 7.6)^{1.2} = 79.85 \frac{\text{lb-mol}}{\text{yr}}$$

$$K_V = 0.7 \text{ (---)}$$

$$V = 7.6 \text{ mph}$$

$$K_{F_0} = 36 \frac{\text{lb-mol}}{\text{yr}}$$

$$K_{C_0} = 5.9 \frac{\text{lb-mol}}{\text{yr} \cdot (\text{mph})^{1.2}}$$

$$m = 1.2 \text{ (---)}$$

$$L_F = \left(79.85 \frac{\text{lb-mol}}{\text{yr}}\right) (0.22434) \left(80 \frac{\text{lb}}{\text{lb-mol}}\right) (1.0) = \boxed{1433.08 \frac{\text{lbs}}{\text{yr}}}$$

Area	Source id	Comment	Guide pole float w/wiper	Sliding Cover Gasket	Pole wiper seal	Pole Sleeve
Knox	T0740	SLEEVE-8"	Y	Y	Y	Y
Knox	T0742	SLEEVE-8"	Y	Y	Y	Y
Knox	T0745	ENRAF	Y	Y	Y	N
Knox	T0748	ENRAF	Y	Y	Y	N
Knox	T0750		N/A	Y	Y	N/A
Knox	T0776		Y	Y	Y	N/A
Knox	T0778	ENRAF	Y	Y	Y	N
Knox	T0795		N/A	Y	Y	N
Knox	T0796		N/A	Y	Y	N
Knox	T0799	SLEEVE-8"	Y	Y	Y	Y
Knox	T0863	SLEEVE-8"	Y	Y	Y	Y
Knox	T0865	COMPLETE	Y	Y	Y	Y
Maryland	T1034	SLEEVE-8"	Y	Y	Y	N/A
Maryland	T1036	SLEEVE-8"	Y	Y	Y	Y
Maryland	T1037		Y	Y	Y	N/A
Maryland	T1046	SLEEVE-8"	Y	Y	Y	Y

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**EXXON** COMPANY, U.S.A.

POST OFFICE BOX 551 • BATON ROUGE, LOUISIANA 70821-0551

REFINING DEPARTMENT  
BATON ROUGE REFINERY

MICHAEL S. MCWILLIAMS  
ENVIRONMENTAL COORDINATOR

May 14, 1997

Mr. Gustave Von Bodungen, Assistant Secretary  
Office of Air Quality and Radiation Protection  
Louisiana Department of Environmental Quality  
P.O. Box 82135  
Baton Rouge, Louisiana 70884-2135

Re: EFR Retrofit Schedule Extension

Dear Mr. Von Bodungen:

Attention: Mr. Bennett H. Farrier, P. E.

Enclosed you will find supplementary information in support of our request of a schedule extension for floating roof retrofits. Table 1 provides a listing of our next projected downtimes for maintenance and API 653 inspections for the tanks with incomplete retrofits.

As indicated in our earlier communication, these tanks have not had gaskets installed under the sliding covers that serve the guidepoles and/or stilling wells in the tanks listed. Per provisions of LAC 33.III 2103.D.4., the extension was requested only for tanks that must be removed from service to install the controls.

There are currently thirty three (33) tanks to be completed. We have installed floats with wiper seals and pole wiper seals on all the subject tanks, to effect as much control as possible without installing the sliding cover gaskets. To accomplish the installation of the sliding cover gaskets, the guide pole roller brackets must be temporarily removed to allow the sliding cover to be elevated to insert the gasket. The roller brackets on these 33 tanks are welded in place (versus bolted in place) and require the use of cutting torches or other "hotwork" (spark generating cutting or welding) for removal). Therefore, a downtime is required to complete the retrofits.

The VOC emission impact of this extension is approximately 12 tons per year (total VOC) and will diminish each year as tanks come out of service and are retrofitted.



Progress made by the Baton Rouge Refinery in demonstrating progress toward VOC emissions reduction should be a consideration in evaluating this request. Since 1994, the Refinery has reduced total VOC emissions by 3,703 tons per year as reported on annual EIS reports to the DEQ. Of this reduction, 2,502 tons per year resulted from decreased emissions from Refinery tankage. Major impacts on the tankage reductions resulted from fitting controls installed in 1994 and 1995, as well as from rationalization of tankage at the Refinery's Maryland Tank Farm. Additional reductions are expected at YE1997 due to the full year impact of fitting controls installed in 1996 and from further tankage rationalization at Maryland Tank Farm.

Prematurely shutting the subject tanks down to install the sliding cover gaskets will result in additional shut down and cleaning emissions for each tank beyond that expected for normal maintenance and the API 653 inspection. Since the crude tanks will require extensive cleaning and disposal of tank bottoms deposits, considerable waste generation and emissions will result from an additional shut down for each tank concerned. VOC emissions from these additional shutdowns are expected to exceed 110 tons.

We believe that we have done all that we can do to accomplish the installation of the required controls, short of removing the tanks from service. We are committed to installation of these remaining controls at the earliest opportunity. We would appreciate your favorable consideration of Exxon's request for an extension of the compliance date for installation of controls on these tanks until the next scheduled downtime as shown on Table 1.

Please contact Kerry Hawkins (504/359-7809) if you have further questions.

Sincerely,



MSMc/KMH

g:\brr\_env\air\assure\tanks\2103F.doc

Enclosure:

Certified Mail-P 187 839 876

c: Dr. Sergudi Mani, LDEQ Capital Regional Office

Table 1

## EFR Fitting Retrofit Schedule

Tank #	Date for API 653 inspection or next maintenance downtime	Stored Hydrocarbon
T0786	1997	MOGAS/MOGAS COMPONENT
T1504	1997	CRUDE
T1501	1998	CRUDE
T0733	1999	MOGAS/MOGAS COMPONENT
T0787	1999	MOGAS/MOGAS COMPONENT
T0797	1999	MOGAS/MOGAS COMPONENT
T1505	1999	CRUDE
T0188	2000	CRUDE
T0702	2000	MOGAS/MOGAS COMPONENT
T0753	2000	MOGAS/MOGAS COMPONENT
T0770	2000	NAPHTHA
T0785	2000	MOGAS/MOGAS COMPONENT
T1506	2000	CRUDE
T1540	2000	CRUDE
T0033	2001	MOGAS/MOGAS COMPONENT
T0720	2001	MOGAS/MOGAS COMPONENT
T0773	2001	MOGAS/MOGAS COMPONENT
T0780	2001	MOGAS/MOGAS COMPONENT
T1525	2001	CRUDE
T0741	2002	MOGAS/MOGAS COMPONENT
T1516	2002	CRUDE
T1539	2002	CRUDE
T0746	2003	MOGAS/MOGAS COMPONENT
T1517	2003	CRUDE
T1523	2004	CRUDE
T1538	2004	CRUDE
T1520	2005	CRUDE
T1536	2005	CRUDE
T0698	2011	MOGAS/MOGAS COMPONENT
T0708	2011	MOGAS/MOGAS COMPONENT
T1502	2012	CRUDE
T0766	2013	MOGAS/MOGAS COMPONENT
T1503	2013	CRUDE

**EXXON** COMPANY, U.S.A.

POST OFFICE BOX 551 • BATON ROUGE, LOUISIANA 70821-0551

REFINING DEPARTMENT  
BATON ROUGE REFINERY

MICHAEL S. MCWILLIAMS  
ENVIRONMENTAL COORDINATOR

Certified Mail (P 187 839 870)  
Return Receipt Requested  
November 13, 1996

Mr. Gustave Von Bodungen, Assistant Secretary  
Louisiana Department of Environmental Quality  
P.O. Box 82135  
Baton Rouge, Louisiana 70884-2135

Dear Mr. Von Bodungen:

Attention: Mr. Bennett H. Farrier, P. E.

As provided for in LAC 33.III 2103.D.4.a, Exxon Refinery requests an extension of the compliance date for the installation of controls on thirty-four (34) external floating roof tanks, as required by LAC 33.III 2103.D.4.c, requirement for guide poles and stilling well systems. The extension is being requested of the "administrative authority" only for tanks that must be removed from service to install the controls.

The Refinery currently has ninety-seven (97) external floating roof storage tanks. Twelve (12) of the tanks are not subject to LAC 33.III 2103.D.4.a, because the hydrocarbon liquids stored are significantly below the vapor pressure cutoff for being subject to the rule. Eleven (11) additional tanks are out of service (either awaiting decommissioning or awaiting repair) and therefore not subject to the rule. The remaining seventy-four (74) tanks are subject to the requirements for guide poles and stilling well systems controls. As cited above, thirty-four (34) tanks require compliance extensions until the tanks are removed from service for API 653 inspections or repair, whichever is earlier.

Table 1 attached indicates the status of the incomplete tanks. Although incomplete, we have installed floats with wiper seals, sliding cover gaskets, pole wiper seals and guide pole sleeves on all the subject tanks, where possible, to effect as much control as possible without involving "hotwork" (spark generating cutting or welding). The tanks not yet complete, cannot be retrofitted while in service because they all require "hot work" or access to connections on the bottom of the tank.

Thirty-two (32) of the tanks have virtually complete installations except for the installation of the sliding cover gaskets. To accomplish the installation of the sliding cover gasket, the guide pole roller brackets must be temporarily removed to allow the sliding cover to be elevated to insert the gasket. The roller brackets on the thirty-two (32) tanks in question are welded in place (versus bolted in place) and require the use of cutting torches or other "hotwork" for removal.



Additionally, two (2) tanks that will not be completely equipped as of the compliance date because of guide pole obstructions. These two tanks' guide poles were, at some time in the past, equipped with three (3) small (3/4 in.) pipes, each passing down into the guide pole itself. These pipes were installed in an attempt to catch top, middle and bottom quality control samples from the tank. The three (3) pipes are attached to the guide pole and will require a tank downtime to remove.

Of the seventy-four (74) tanks subject to the control requirements, twenty-two (22) have been equipped with the appropriate fittings, as shown in Table 2. Where possible, we have also installed pole sleeves for additional controls beyond that required by the rule. Seventeen (17) tanks also have had guide pole "sleeves" installed to further reduce emissions. Twenty-three (23) tanks that are out of service or exempt from the rule are shown in Table 3.

Due to the age and diversity of the tanks serving the Refinery, we have encountered a number of challenges and effected solutions to these challenges that may be of interest to you and others. We have been working closely with several vendors on the development and installation of control apparati. Working with one particular vendor we have overcome the a significant challenge dealing with the guide pole floats on crude tanks. The float and its cable drip crude oil on the roof deck and ladder platform, creating a significant "housekeeping", safety, and potential environmental concern. This has been resolved with the installation of drip "sinks" on the top of guide poles to capture and route crude "drippings" back into the tank via the guidepole. Twenty-five (25) of these devices will be installed on our crude tanks by the compliance date. (See Photo)

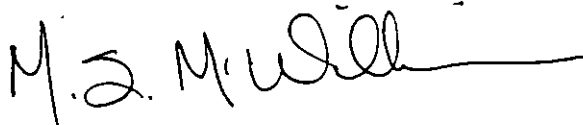
We also have a number of old ENRAF gauging systems installed on tanks. This installation has two slotted poles (a 10" stilling well pole and a 6" guidepole ) in a 20" roof well. We specially designed and fitted gaskets and external pole wiper seals to accommodate this unusual installation. We also installed floats fitted with wiper seals on the guide poles.

We believe that we have done all that we can do to accomplish the installation of the required controls, short of removing the tanks from service. We are committed to installation of these remaining controls at the earliest opportunity. We would appreciate your favorable consideration of Exxon's request for an extension of the compliance date, for installation of controls on these tanks until the next expected downtime.

Per our conversations regarding this request, we will provide you an estimate of the emissions reductions involved in the extension request and an estimated timetable for installing the remaining sliding cover gaskets.

Please contact Kerry Hawkins (504/359-7809) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "M. S. McWill", with a long horizontal flourish extending to the right.

34

**Table 1 -EFR Tanks-Fitting Controls Not Complete**

13-Nov-96

N/A-Not Applicable Y-Yes, Fitting Controls Installation Complete N-No, Fitting Controls Installation Not Complete

Area	Source id	Comment	Guide pole float w/wip	Sliding Cover Gasket	Pole wiper seal	Pole Sleeve
Anchorage	T1501	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1502	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1503	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1504	WELDED ROLLERS	N/A	N	Y	N/A
Anchorage	T1505	WELDED ROLLERS	N/A	N	Y	N/A
Anchorage	T1506	WELDED ROLLERS	N/A	N	Y	N/A
Anchorage	T1516	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1517	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1520	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1523	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1525	WELDED ROLLERS	N/A	N	Y	N/A
Anchorage	T1536	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1538	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1539	WELDED ROLLERS	Y	N	Y	N
Anchorage	T1540	WELDED ROLLERS	Y	N	Y	N
East	T0188	WELDED ROLLERS	N/A	N	Y	N/A
East	T0770	WELDED ROLLERS	Y	N	Y	N
Knox	T0655	OBSTRUCTION IN GUIDE POLE	N	Y	Y	Y
Knox	T0698	WELDED ROLLERS	Y	N	Y	N
Knox	T0702	WELDED ROLLERS	Y	N	Y	N
Knox	T0708	WELDED ROLLERS	Y	N	Y	N
Knox	T0720	WELDED ROLLERS	Y	N	Y	N
Knox	T0733	WELDED ROLLERS	Y	N	Y	N
Knox	T0741	WELDED ROLLERS	Y	N	Y	N

21

1



Area	Source id	Comment	Guide pole float w/wip	Sliding Cover Gasket	Pole wiper seal	Pole Sleeve
Knox	T0746	WELDED ROLLERS	Y	N	Y	N
Knox	T0753	WELDED ROLLERS	Y	N	Y	N
Knox	T0766	WELDED ROLLERS	Y	N	Y	N
Knox	T0773	WELDED ROLLERS	Y	N	Y	N
Knox	T0785	WELDED ROLLERS	Y	N	Y	N
Knox	T0786	WELDED ROLLERS	Y	N	Y	N
Knox	T0787	WELDED ROLLERS	Y	N	Y	N
Knox	T0797	WELDED ROLLERS	Y	N	Y	N
Knox	T0864	OBSTRUCTION IN GUIDE POLE	N	Y	Y	Y
South	T0033	WELDED ROLLERS	Y	N	Y	N

## Table 2-EFR Tank Fitting Controls Complete

13-Nov-96

22

N/A-Not Available Y-Yes, Fitting Controls Installation Complete N-No Fitting Controls Installation Not Complete

Tank Farm	Source id	Guide Pole	Stilling Well	Guide pole float w/wiper	Sliding Cover Gasket	Pole wiper seal	Pole Sleeve
Anchorage	T1531	8"-SLOTTED	N/A	Y	Y	Y	Y
Anchorage	T1537	8"-SLOTTED	20" UNSLOTTED	Y	Y	Y	Y
East	T0189	8" SLOTTED	20" UNSLOTTED	Y	Y	Y	Y
East	T0190	8" SLOTTED	N/A	Y	Y	Y	Y
East	T0195	8" SLOTTED	N/A	Y	Y	Y	Y
Knox	T0701	8" SLOTTED	N/A	Y	Y	Y	Y
Knox	T0703	8" SLOTTED	N/A	Y	Y	Y	Y
Knox	T0710	8" SLOTTED	N/A	Y	Y	Y	Y
Knox	T0727	8" SLOTTED	N/A	Y	Y	Y	Y
Knox	T0728	6"SLOTTED	10"ENRAF	Y	Y	Y	N/A
Knox	T0729	6"SLOTTED	10"ENRAF	Y	Y	Y	N/A
Knox	T0738	8" SLOTTED	N/A	Y	Y	Y	Y
Knox	T0740	8" SLOTTED	N/A	Y	Y	Y	Y
Knox	T0742	8" SLOTTED	N/A	Y	Y	Y	Y
Knox	T0750	N/A	20" UNSLOTTED	N/A	Y	Y	N/A
Knox	T0776	6" SLOTTED	10" ENRAF	Y	Y	Y	N/A
Knox	T0799	8" SLOTTED	N/A	Y	Y	Y	Y
Knox	T0863	8" SLOTTED	N/A	Y	Y	Y	Y
Maryland	T1034	8" SLOTTED	N/A	Y	Y	Y	N/A

23

Tank Farm	Source id	Guide Pole	Stilling Well	Guide pole float w/wiper	Sliding Cover Gasket	Pole wiper seal	Pole Sleeve
Maryland	T1036	8" SLOTTED	N/A	Y	Y	Y	Y
Maryland	T1037	8" SLOTTED	N/A	Y	Y	Y	N/A
Maryland	T1046	8" SLOTTED	N/A	Y	Y	Y	Y

23

**Table 3 -EFR Tanks Exempt From Fitting Control Requirements**

13-Nov-96

N/A-Not Applicable Y-Yes, Fitting Controls Installation Complete N-No, Fitting Controls Installation Not Complete

Area	Source id	Comment	Guide pole float w/wiper	Sliding Cover Gasket	Pole wiper seal	Pole Sleeve
Anchorage	T1528	N/A-OUS	N	N	N	N
Knox	T0865	N/A-OUS	N	Y	Y	Y
Maryland	T1006	N/A-OUS	N	N	N	N
Maryland	T1007	N/A-OUS	N	N	N	N
Maryland	T1024	N/A-OUS	N	N	N	N
Maryland	T1025	N/A-OUS	N	N	N	N
Maryland	T1035	N/A-OUS	N	N	N	N
South	T0060	N/A-OUS	N	N	N	N
South	T0071	N/A-OUS	N	N	N	N
South	T0130	N/A-<TVP	Y	Y	Y	N
South	T0131	N/A-<TVP	Y	Y	Y	N
South	T0133	N/A-OUS	N	N	N	N
South	T0402	N/A-<TVP	N	N	N	N
South	T0403	N/A-<TVP	N	N	N	N
South	T0404	N/A-<TVP	N	N	N	N
South	T0405	N/A-<TVP	N	N	N	N
South	T0406	N/A-<TVP	N	N	N	N
South	T0407	N/A-<TVP	N	N	N	N
South	T0408	N/A-<TVP	N	N	N	N
South	T0410	N/A-<TVP	N	N	N	N
South	T0419	N/A-<TVP	Y	Y	Y	N
South	T0461	N/A-<TVP	Y	Y	Y	N
South	T0919	N/A-OUS	N	N	N	N

25

APPENDIX B

Public Participation Documentation



State of Louisiana  
Department of Environmental Quality



M.J. "MIKE" FOSTER, JR.  
GOVERNOR

J. DALE GIVENS  
SECRETARY

September 8, 1997

MEMORANDUM

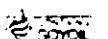
TO: Tim Knight  
Administrator  
Enforcement Division  
Office of Legal Affairs and Enforcement

FROM: Gus Von Bodungen, P.E. *GVB*  
Assistant Secretary  
Office of Air Quality and Radiation Protection

SUBJECT: Potpourri for Revision to 15% Rate of Progress (ROP) State Implementation Plan  
(SIP for Volatile Organic Compound (VOC) Emission Reduction)

Attached you will find a hard copy and disc of a potpourri announcement that the Air Quality Division would like to have published in the September 20, 1997, Louisiana Register. We would also like this published in the Baton Rouge newspaper.

Thank you for your assistance in this matter.



POTPOURRI

Department of Environmental Quality (DEQ)  
Office of Air Quality and Radiation Protection  
Air Quality Division

Revision to 15% Rate of Progress (ROP)  
State Implementation Plan (SIP)  
for Volatile Organic Compound (VOC) Emission Reductions

Under the authority of the Louisiana Environmental Quality Act, R.S. 30:2001 et seq., the secretary gives notice that the Office of Air Quality and Radiation Protection will submit a revision to the EPA approved Rate of Progress SIP. The SIP demonstrates the State's ability to reduce VOC emissions in the serious ozone nonattainment area by 15% by 1996 as mandated by the 1990 Clean Air Act amendments.

The revision will provide for a schedule extension for installation of guide pole sliding cover gaskets on 33 external floating roof tanks at Exxon Company, U.S.A. DEQ and EPA reviews have determined that the delay in installation of these controls has no significant impact on the VOC reduction requirement in the SIP.

A copy of the SIP revision may be viewed from 8 a.m. to 4:30 p.m., Monday through Friday, at the DEQ Headquarters, Air Quality Division, 7290 Bluebonnet, 2nd floor, Baton Rouge, LA; or at the Capital Regional Office, 5222 Summa Court, Baton Rouge, LA.

A public hearing will be held at 1:30 p.m. on October 30, 1997, in Room 326, Maynard Ketcham Building, 7290 Bluebonnet, Baton Rouge, LA. Interested persons are invited to attend and submit oral comments on the proposal. Should individuals with a disability need an accommodation in order to participate, please contact Pat Salvaggio at (504) 765-0915 or FAX (504) 765-0921.

All interested persons are invited to submit written comments concerning the SIP revision. Such comments should be submitted no later than 4:30 p.m., November 6, 1997. Submit comments to Pat Salvaggio, Department of Environmental Quality, Air Quality Division, Box 82135, Baton Rouge, LA, 70884-2135.

Gustave Von Bodungen, P.E.  
Assistant Secretary

Gus Von Bodungen, P.E.  
Assistant Secretary

Gus Von Bodungen, P.E.  
Assistant Secretary

9709#041

9709#042

**POTPOURRI**

**POTPOURRI**

**Department of Environmental Quality  
Office of Air Quality and Radiation Protection  
Air Quality Division**

**Department of Labor  
Office of Workers' Compensation**

**Revision to 15 Percent Rate of  
Progress State Implementation Plan (SIP)**

**Average Weekly Wage Rate**

Under the authority of the Environmental Quality Act, R.S. 30:2001 et seq., the secretary gives notice that the Office of Air Quality and Radiation Protection will submit a revision to the EPA approved Rate of Progress State Implementation Plan (SIP). The SIP demonstrates the state's ability to reduce Volatile Organic Compounds (VOC) emissions in the serious ozone nonattainment area by 15 percent by 1996, as mandated by the 1990 Clean Air Act amendments.

Pursuant to Act 583 of the Regular Session of the 1975 Louisiana Legislature, this state's average weekly wage upon which the maximum workers' compensation weekly benefit amount will be based, effective September 1, 1997, has been determined by the Department of Labor to be \$466.57.

The revision will provide for a schedule extension for installation of guide pole sliding cover gaskets on 33 external floating roof tanks at Exxon Company, U.S.A. DEQ and EPA reviews have determined that the delay in installation of these controls has no significant impact on the VOC reduction requirement in the SIP.

Gary J. Forster  
Secretary

9709#077

**POTPOURRI**

**Department of Labor  
Office of Workers' Compensation**

A copy of the SIP revision may be viewed from 8 a.m. to 4:30 p.m., Monday through Friday, at the DEQ Headquarters, Air Quality Division, 7290 Bluebonnet, Second Floor, Baton Rouge, LA; or at the Capital Regional Office, 5222 Summa Court, Baton Rouge, LA.

**Weekly Compensation Benefit Limits**

A public hearing will be held at 1:30 p.m. on October 30, 1997, in Room 326, Maynard Ketcham Building, 7290 Bluebonnet, Baton Rouge, LA.

Pursuant to R.S. 23:1202 and based on the statewide average weekly wage as determined by the Department of Labor, the following limits shall apply to weekly compensation benefits for claimants injured during the period September 1, 1997 through August 31, 1998.

Interested persons may attend and submit oral comments on the proposal. Any individual requesting special accommodations due to a disability should notify Pat Salvaggio at (504) 765-0915 or FAX (504) 765-0921.

Average Weekly Wage	Maximum Compensation	Minimum Compensation
\$466.57	\$350.00	\$93.00

All interested persons may submit written comments concerning the SIP revision no later than 4:30 p.m., November 6, 1997, to Pat Salvaggio, Department of

Gary J. Forster  
Secretary

9709#074



**CERTIFIED COPY**

da

9/22/97

**CAPITAL CITY PRESS**

**Publisher of**

**THE ADVOCATE**

**PROOF OF PUBLICATION**

The hereto attached notice was published in **THE ADVOCATE**, a daily newspaper of general circulation, published in Baton Rouge, Louisiana, and the Official Journal of the State of Louisiana, the City of Baton Rouge and the Parish of East Baton Rouge, in the issues of:

SEPTEMBER 18, 1997

*Tracy Musema*  
Advertising Representative

Sworn and subscribed before me by the person whose signature appears above in Baton

Rouge, La. on this

18

SEPTEMBER 97

day of

19

AD.

*W. H. Mc...*  
Notary Public

My Commission Expires:

Indefinite

**PUBLIC NOTICE**

**POTPOURRI**  
Department of Environmental Quality  
Office of Air Quality and Radiation Protection  
Air Quality Division  
Revision to 1975 Rate of Progress (ROP)

**State Implementation Plan (SIP) for Volatile Organic Compound (VOC) Emission Reductions**

Under the authority of the Louisiana Environmental Quality Act, R.S. 30:2007 et seq., the secretary gives notice that the Office of Air Quality and Radiation Protection will submit a revision to the EPA approved Rate of Progress SIP. The SIP demonstrates the state's ability to reduce VOC emissions in the serious ozone nonattainment area by 15 percent by 1995, as mandated by the 1990 Clean Air Act amendments.

The revision will provide for a schedule extension for installation of guide posts sliding cover gauges on 33 existing floating roof tanks at Exxon Company, U.S.A. DEQ and EPA reviews have determined that the delay in installation of these controls has no significant impact on the VOC reduction requirement in the SIP.

A copy of the SIP revision may be viewed from 8 a.m. to 4:30 p.m., Monday through Friday, at the DEQ Headquarters, Air Quality Division, 7290 Bluebonnet, Second Floor, Baton Rouge, LA; or at the Capital Regional Office, 5222 Sumner Court, Baton Rouge, LA.

A public hearing will be held at 1:30 p.m. on October 30, 1997, in Room 328, Maynard Ketchum Building, 7290 Bluebonnet, Baton Rouge, LA. Interested persons are invited to attend and submit oral comments on the proposal. Should individuals with a disability need an accommodation in order to participate, contact Pat Selveglio at (504) 765-0915 or FAX (504) 765-0921.

All interested persons are invited to submit written comments concerning this SIP revision. Such comments should be submitted no later than 4:30 p.m., November 6, 1997. Submit comments to Pat Selveglio, Department of Environmental Quality, Air Quality Division, Box 82135, Baton Rouge, LA 70884-2135.

**GUSTAVE VON BODUNGEN,**  
P.E.  
Assistant Secretary  
1271903-sep 18-11

RECEIVED BY  
DEQ

Investigations and Regulation  
Development Division

SEP 22 1997

Regulation Development Section

Time: \_\_\_\_\_

Clerk: \_\_\_\_\_

1271903

POTPOURRI

Original  
e.g. 11-4-97

DEPARTMENT OF ENVIRONMENTAL QUALITY  
STATE OF LOUISIANA

The public hearing of the Department of Environmental Quality, 7290 Bluebonnet Boulevard, Ketcham Building, Baton Rouge, Louisiana, beginning at 1:33 p.m. on October 30, 1997.

Before Mark LaCour, Certified Stenomask Reporter, in and for the State of Louisiana.

RECEIVED BY:  
DEQ

Investigations and Regulation  
Development Division

NOV - 4 1997

Regulation Development Section

Time: \_\_\_\_\_

Clerk: \_\_\_\_\_

**ASSOCIATED REPORTERS, INC.**

(504) 343-2020

H E A R I N G

1  
2           **MR. SKY-PECK:**

3           Good afternoon. My name is Steve  
4 Sky-Peck. I'm employed with the Louisiana  
5 Department of Environmental Quality. I'll be  
6 serving as hearing officer this afternoon to  
7 receive comments regarding the Air Quality  
8 Division State Implementation Plan.

9           The comment period for the State  
10 Implementation Plan revision began on  
11 September 20th, 1997, when the notice of  
12 intent was published in the Louisiana  
13 Register. The comment period will close at  
14 4:30 p.m. November 6, 1997. It would be  
15 helpful to us if all oral comments received  
16 today were followed up in writing.

17           This public hearing provides a forum  
18 for all interested parties to present  
19 comments on the proposed changes. I'll ask  
20 that each commentor begin by stating their  
21 name and affiliation for the record.

22           The Air Quality Division gives notice  
23 that a revision will be made to the  
24 Environmental Protection Agency approved Rate  
25 of Progress State Implementation Plan.

1           The Air Quality Division will receive  
2           comments regarding the revision to the State  
3           Implementation Plan. The revision will  
4           provide for a schedule extension for  
5           installation of guide pole sliding cover  
6           gaskets on 33 external floating roof tanks at  
7           Exxon Company, U.S.A. Department of  
8           Environmental Quality and Environmental  
9           Protection Agency reviews have determined  
10          that the delay in installation of these  
11          controls has no significant impact on the  
12          volatile organic compound reduction  
13          requirement in the State Implementation Plan.

14                 Does anyone care to comment on this  
15          regulation?

16                 If not then this hearing is closed.

17

18                 **WHEREUPON, AT 1:35 P.M. THE HEARING CLOSED**

19

\* \* \* \* \*

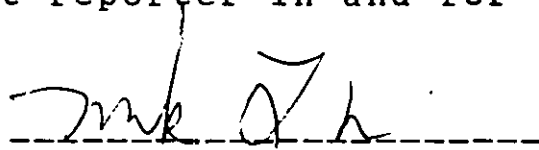
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I, the undersigned reporter, do hereby certify that the above and foregoing is a true and correct transcription of the stenomask tape of the proceedings had herein, taken down by me and transcribed under my supervision, to the best of my ability and understanding, at the time and place hereinbefore noted, in the above-entitled cause.

I further certify that the witness was duly sworn by me in my capacity as a Certified Court Reporter pursuant to the provisions of R.S. 37:2551 et seq. in and for the state of Louisiana; that I am not of counsel nor related to any of the counsel of any of the parties, nor in the employ of any of parties, and that I have no interest in the outcome of this action.

I further certify that my license is in good standing as a court reporter in and for the state of Louisiana.

  
-----  
Mark LaCour, C.C.R.

# 89054

DEPARTMENT OF ENVIRONMENTAL QUALITY  
ATTENDANT SIGN-IN SHEET

October 30, 1997

SIP - Revision to 15% Rule of Progress SIP for VOC Emission Reduction

NAME	AFFILIATION	ADDRESS	PHONE NUMBER	COMMENT (Y/N)
R McTeal	LUOBT	801 N Blvd #201 BRLA 70802	387-3505	N
H. Graham Jr.	LCA	One Amer. Place Suite 2040 70825	344-2607	N
Charlotte Skays	LBEO	9290 Boulevard	765-0914	N
H. H. H. H.	"	"	"	N
J. J. J. J.	LDFO	"	"	N



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

NOV 04 1997

Mr. Robert Hannah  
Administrator  
Air Quality Division  
Louisiana Department of  
Environmental Quality  
P.O. Box 82135  
Baton Rouge, LA 70884 2135

Dear Mr. Hannah:

Thank you for the opportunity to provide comments on the proposed site-specific revision to the Louisiana 15 Percent Rate-of-Progress Plan. The revision would grant Exxon Company U.S.A. an extension to the compliance date for the installation of guidepole controls on 33 floating roof tanks.

According to LAC 33:III.2103 (Storage of Volatile Organic Compounds), which was approved as part of the Baton Rouge 15 Percent Rate-of-Progress Plan, the compliance date for installing the controls was November 1996. Exxon has calculated that the emission reductions resulting from installation of the guidepole controls (sliding gaskets) as required by the rule would be 12 tons/year (0.03 tons/day). The gaskets represent a very small part of the 2,500 tons/year of emission reductions from Exxon's tank controls in the approved 15 Percent Plan.

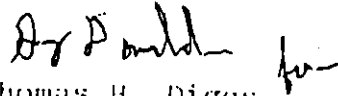
According to Exxon, to accomplish the installation of the sliding cover gaskets, the guide pole roller brackets must be temporarily removed to allow the sliding cover to be elevated to insert the gasket. The roller brackets on these 33 tanks are welded in place (versus bolted in place) and require the use of cutting torches, or "hotwork" (spark generating cutting or welding, for removal. Therefore, the tanks would have to be removed from service. The shutdown of the tanks prior to their next scheduled downtime to install the sliding cover gaskets would result in additional VOC emissions of over 100 tons.

We have reviewed the supporting documentation submitted by Exxon and feel that the emissions/reductions have been adequately quantified. Exxon has made a good faith effort to install the required controls to the greatest extent possible according to the compliance schedules outlined in §2103. The delayed reductions (12 tons/year) will not significantly impact the 15 Percent or 9 Percent Rate-of-Progress Plans for Baton Rouge.

Therefore, we have no comments to submit on the proposed site-specific State Implementation Plan revision for Exxon.

Thank you, again, for the opportunity to comment on the proposal. If I can be of further assistance, please contact me at (214) 665-7214 or Jeanne Schulze of my staff at (214) 665-7254.

Sincerely yours,



Thomas H. Diggs  
Chief

Air Planning Section (6PD-L)





**Louisiana  
Mid-Continent  
Oil and Gas Association**

W. R. "BOB" HERRIN  
Chairman of the Board

B. JIM PORTER  
President

801 North Blvd. • Suite 201 • Baton Rouge, LA 70802-5727 • (504) 387-3205 • Fax (504) 344-5502

October 30, 1997

Ms. Pat Salvaggio  
Air Quality Division  
Louisiana Department of Environmental Quality  
Post Office Box 82135  
Baton Rouge, Louisiana 70884-2135

Re: 15% Rate of Progress SIP  
Amendment

Dear Ms. Salvaggio:

The Louisiana Mid-Continent Oil and Gas Association appreciates the opportunity to submit comments on the proposed revisions to the 15 Percent Rate of Progress State Implementation Plan (SIP) cited in the September 20, 1997 Louisiana Register. Mid-Continent is an industry organization which represents individuals and companies that produce, transport, refine and market approximately 90% of the oil and natural gas in Louisiana. Exxon Company, U.S.A. is a member company of Mid-Continent and is impacted by the proposed action.

The proposed SIP revision extends the compliance time for installing controls on several tanks at the Exxon facility. It was originally thought that these controls could be installed without emptying the tanks. This has proven not to be the case, and the extra time is needed to perform this work in a more orderly fashion.

The Department is taking the proposed action at the request of Exxon. Mid-Continent appreciates the Department's willingness to work with industry to review and rectify unintended problems caused by the implementation of this and other rules.

Once again, Mid-Continent appreciates the opportunity to submit these comments.

Sincerely,

Richard T. Metcalf  
Health, Safety and Environmental  
Affairs Coordinator

RECEIVED

OCT 20 1997

LA. DEPARTMENT OF  
ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**EXXON** COMPANY, U.S.A.

POST OFFICE BOX 181 • BATON ROUGE, LOUISIANA 70821-0181

REFINING DEPARTMENT  
BATON ROUGE REFINERY

October 21, 1997

Ms. Pat Salvaggio  
Air Quality Division  
Louisiana Department of Environmental Quality  
P.O. Box 82135  
Baton Rouge, Louisiana 70884-2135

Re: SIP Revision Comments  
Exxon USA Tank Fitting Schedule Retrofit Extension

Dear Ms. Salvaggio:

Thank you for this opportunity to comment regarding the proposed SIP revision dealing with the external floating roof tank fitting schedule extension for the Baton Rouge Refinery. The request for comment appeared in the September 20, 1997 Louisiana Register.

We support the SIP modification as proposed and request that the Air Quality Division include as a part of the record, our submissions of November 13, 1996, May 14, 1997, and July 3, 1997 requesting the extension.

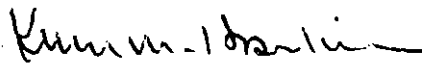
These documents provide information supporting the extension request. The VOC emission impact of the floating roof tank fittings installation is approximately 12 tons per year (total VOC) and will diminish each year as tanks come out of service and are retrofitted.

Prematurely shutting the subject tanks down to install the sliding cover gaskets will result in additional shut down and cleaning emissions for each of the tanks beyond that expected for normal maintenance and the API 653 inspections. Emissions from these additional shutdowns are expected to exceed 110 tons.

Progress made by the Baton Rouge Refinery in demonstrating progress toward VOC emissions reductions should be noted. Since 1994, the Refinery has reduced total VOC emissions by 3,703 tons per year as reported on annual EIS reports to the DEQ. Of this reduction, 2,502 tons per year resulted from decreased emissions from Refinery tankage.

Again, we appreciate the opportunity to comment on this SIP revision.

Sincerely,

  
Kerry M. Hawkins, P.E.

knh

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Enclosures



State of Louisiana  
Department of Environmental Quality



M.J. "MIKE" FOSTER, JR.  
GOVERNOR

J. DALE GIVENS  
SECRETARY

November 24, 1997

Mr. Thomas Diggs  
Chief, Air Planning Section  
U.S. Environmental Protection  
Agency  
Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733

Dear Mr. Diggs:

This is to acknowledge receipt of your comment letter of November 5, 1997, on Louisiana's proposed site-specific revision to the 15% Rate of Progress Plan for Exxon. No changes will be made to the proposed SIP in response to your comments, since no objections or recommendations were presented.

Thank you for your comments on the proposed SIP revision. The comment letter will be included in the final SIP submittal.

Sincerely,

Pat Salvaggio  
Environmental Project Specialist

c: file



State of Louisiana  
Department of Environmental Quality



M.J. "MIKE" FOSTER, JR.  
GOVERNOR

J. DALE GIVENS  
SECRETARY

November 19, 1997

Mr. Kerry M. Hawkins  
Exxon Company, U.S.A.  
Post Office Box 551  
Baton Rouge, LA 70821-0551

RE: 15% Rate of Progress SIP  
Revision

The Louisiana Department of Environmental Quality (LDEQ) is in receipt of your comment letter on the September 20, 1997, proposed site-specific 15% Rate of Progress State Implementation Plan (SIP) revision.

In response to your comments of October 21, 1997: 1. The Exxon letters of November 13, 1996, May 14, 1997, and July 3, 1997, are a part of the September 20, 1997, proposed SIP revision and will be included in LDEQ's final SIP submittal to EPA; and, 2. The additional information on Exxon's progress in reducing VOC emission reductions since 1994 will be included in the final SIP revision, as requested. Your comment letter will also be included in the final SIP.

If you are interested in viewing the final SIP revision, a copy will be retained at LDEQ Headquarters, 7290 Bluebonnet - 2nd floor, Baton Rouge, LA.

Sincerely,

Pat Salvaggio  
Environmental Project Specialist

c: file

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State of Louisiana  
Department of Environmental Quality



M.J. "MIKE" FOSTER, JR.  
GOVERNOR

J. DALE GIVENS  
SECRETARY

November 19, 1997

Mr. Richard T. Metcalf  
Louisiana Mid-Continent Oil and Gas  
Association  
801 North Blvd., Suite 201  
Baton Rouge, LA 70802-5727

RE: 15% Rate of Progress SIP  
Revision

Dear Mr. Metcalf:

The Louisiana Department of Environmental Quality is in receipt of your comment letter on the September 20, 1997, proposed site-specific 15% Rate of Progress State Implementation Plan (SIP) revision. Your letter will be included in the final SIP document submitted to EPA Region 6.

Thank you for expressing Louisiana Mid-Continent Oil and Gas Association's support of the proposed revision.

Sincerely,

Pat Salvaggio  
Environmental Project Specialist

c: file

