

ATTACHMENT 2

Table IX A - 1
Permit Shield for Non-applicable Requirements
ALL SOURCES

Citation	Title or Description (Reason not applicable)
BAAQMD Regulation 8, Rule 51	"Organic Compounds – Adhesive and Sealant Products" (7/17/02) The applicant has certified that none of the regulated activities specified in this rule are currently taking place at this facility.
BAAQMD Regulation 11, Rule 1	"Hazardous Pollutants – Lead" (3/17/82) The applicant has certified that there are no sources at this facility with the potential to emit in excess of 15 pounds per day (11-1-301) each, or with the potential to result in ground level lead concentrations in excess of 1.0 microgram/m ³ averaged over 24 hours (11-1-302).
<u>40 CFR 60.692-3(b)</u>	<u>This subsection of NSPS Subpart QQQ requires vents on oil-water separators to be routed through a closed vent system to a control device. The applicant's separator has a fixed roof that is in full contact with the liquid and does not contain any vents. As indicated in Table IV-C, applicant is subject to BAAQMD Regulation 8-8-302.1, which requires a "solid, vapor-tight, full contact cover which totally encloses the separator tank, chamber or basin (compartment) liquid contents, with all cover openings closed and sealed." Since no vents exist, there is nothing to route to a control device, so this subsection of Subpart QQQ does not apply.</u>

ATTACHMENT 3

**Table IX B - 1
Permit Shield for Subsumed Requirements
S-324 API OIL/WASTEWATER SEPARATOR**

Subsumed Requirement Citation	Title or Description	Streamlined Requirements	Title or Description
NSPS Subpart QQQ, 40 CFR 60.693-2(a)(1)	Floating roofs installed as alternative standard for oil-water separators shall be equipped with a closure device.	BAAQMD 8-8-302.1 and Permit Condition 1440, Part 1	The API separator shall be equipped and operated such that the fixed roof is in full contact with the liquid at all times. As described in the NSPS Subpart QQQ Request for Alternative Standards pursuant to 40 CFR 60.693-2(b) and 60.694 submitted to USEPA by Unocal on December 28, 1987, in lieu of a floating roof equipped with a closure device, the separator would be equipped with the full contact fixed roof as an equivalent closure
NSPS Subpart QQQ, 40 CFR 60.693-2(a)(3)	Floating roofs installed as alternative standard for oil-water separators shall be floating on the liquid (i.e., off the roof supports) at all times, except for low flow conditions.	BAAQMD 8-8-302.1 and Permit Condition 1440, Part 1	The API separator shall be equipped and operated such that the fixed roof is in full contact with the liquid at all times. As described in the NSPS Subpart QQQ Request for Alternative Standards pursuant to 40 CFR 60.693-2(b) and 60.694 submitted to USEPA by Unocal on December 28, 1987, in lieu of a floating roof equipped with a closure device, the separator would be equipped with the full contact fixed roof as an equivalent closure device.
NSPS Subpart QQQ, 40 CFR 60.697(k)	For oil-water separators subject to 60.693-2, record information from inspections conducted pursuant to the 60.693-2(a)(1)(iii)(A) and (B) requirements for floating roofs equipped with a closure device.	BAAQMD 8-8-302.1 and Permit Condition 1440, Part 1	The API separator shall be equipped and operated such that the fixed roof is in full contact with the liquid at all times. As described in the NSPS Subpart QQQ Request for Alternative Standards pursuant to 40 CFR 60.693-2(b) and 60.694 submitted to USEPA by Unocal on December 28, 1987, in lieu of a floating roof equipped with a closure device, the separator would be equipped with the full contact fixed roof as an equivalent closure device.