STATE OF MISSISSIPPI
AIR POLLUTION CONTROL PERMIT

TO CONSTRUCT AIR EMISSIONS EQUIPMENT

THIS CERTIFIES THAT

Chevron Products Company, Pascagoula Refinery
250 Industrial Road
Pascagoula, Mississippi
Jackson County

"FCCU NOx Limits (Consent Decree)"

has been granted permission to construct air emissions equipment to comply with the emission limitations, monitoring requirements and other conditions set forth herein. This permit is issued in accordance with the provisions of the Mississippi Air and Water Pollution Control Law (Section 49-17-1 et. seq., Mississippi Code of 1972), and the regulations and standards adopted and promulgated thereunder.

MISSISSIPPI ENVIRONMENTAL QUALITY PERMIT BOARD

AUTHORIZED SIGNATURE
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

Issued: AUG 2 1 2015

Permit No.: 1280-00058

2299 PER20140003

Part I.

A. GENERAL CONDITIONS

1. This permit is for air pollution control purposes only. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D.)

2. Any activities not identified in the application are not authorized by this permit. (Ref.: Miss. Code Ann. 49-17-29 1.b)

3. The knowing submittal of a permit application with false information may serve as the basis for the Permit Board to void the permit issued pursuant thereto or subject the applicant to penalties for operating without a valid permit pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(5).)

4. It is the responsibility of the applicant/permittee to obtain all other approvals, permits, clearances, easements, agreements, etc., which may be required including, but not limited to, all required local government zoning approvals or permits. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.1.D(6).)

5. The issuance of a permit does not release the permittee from liability for constructing or operating air emissions equipment in violation of any applicable statute, rule, or regulation of state or federal environmental authorities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(7).)

6. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit, unless halting or reducing activity would create an imminent and substantial endangerment threatening the public health and safety of the lives and property of the people of this state. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(a).)

7. The permit and/or any part thereof may be modified, revoked, reopened, and reissued, or terminated for cause. Sufficient cause for a permit to be reopened shall exist when an air emissions stationary source becomes subject to Title V. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(b).)

8. The permit does not convey any property rights of any sort, or any exclusive privilege. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(c).)

9. The permittee shall furnish to the DEQ within a reasonable time any information the DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee shall furnish such records to the DEQ along with a claim of confidentiality. The permittee may furnish such

records directly to the Administrator along with a claim of confidentiality. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.B(15)(d).)

10. Design and Construction Requirements: The stationary source shall be designed and constructed so as to operate without causing a violation of an Applicable Rules and Regulations, without interfering with the attainment and maintenance of State and National Ambient Air Quality Standards, and such that the emission of air toxics does not result in an ambient concentration sufficient to adversely affect human health and well-being or unreasonably and adversely affect plant or animal life beyond the stationary source boundaries. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A.)

11. Solids Removal: The necessary facilities shall be constructed so that solids removed in the course of control of air emissions may be disposed of in a manner such as to prevent the solids from becoming windborne and to prevent the materials from entering State waters without the proper environmental permits. (Ref.: Miss. Code Ann. 49-17-29)

12. Diversion and Bypass of Air Pollution Controls: The air pollution control facilities shall be constructed such that diversion from or bypass of collection and control facilities is not needed except as provided for in 11 Miss. Admin. Code Pt. 2, R. 1.10., "Air Emission Regulations for the Prevention, Abatement, and Control of Air Contaminants", Section 10. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 1.10.)

13. Fugitive Dust Emissions from Construction Activities: The construction of the stationary source shall be performed in such a manner so as to reduce fugitive dust emissions from construction activities to a minimum. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.A(4).)

14. Right of Entry: The permittee shall allow the Mississippi Department of Environmental Quality Office of Pollution Control and the Mississippi Environmental Quality Permit Board and/or their representatives upon presentation of credentials:

    a) To enter upon the permittee's premises where an air emission source is located or in which any records are required to be kept under the terms and conditions of this permit; and

    b) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any air emissions. (Ref.: Miss. Code Ann. 49-17-21)

15. Permit Modification or Revocation: After notice and opportunity for a hearing, the Permit Board may modify the permit or revoke it in whole or in part for good cause shown including, but not limited to:

    a) Persistent violation of any of the terms or conditions of this permit;

b) Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c) A change in federal, state, or local laws or regulations that require either a temporary or permanent reduction or elimination of previously authorized air emission.

(Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.2.C.)

16. Public Record and Confidential Information: Except for data determined to be confidential under the Mississippi Air & Water Pollution Control Law, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Mississippi Department of Environmental Quality, Office of Pollution Control. (Ref.: Miss. Code Ann. 49-17-39)

17. Permit Transfer: This permit shall not be transferred except upon approval of the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.16.B)

18. Severability: The provisions of this permit are severable. If any provision of the permit, or the application of any provision of the permit to any circumstances, is challenged or held invalid, the validity of the remaining permit provisions and/or portions thereof or their application to other persons or sets of circumstances, shall not be affected thereby. (Ref. 11 Miss. Admin. Code Pt. 2, R. 2.1.D(7).)

19. Permit Expiration: The permit to construct will expire if construction does not begin within eighteen (18) months from the date of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(1).)

20. Certification of Construction: A new stationary source issued a Permit to Construct cannot begin operation until certification of construction by the permittee. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(3).)

21. Beginning Operation: Except as prohibited in Part I, Condition 24 of this permit, after certification of construction by the permittee, the Permit to Construct shall be deemed to satisfy the requirement for a permit to operate until the date the application for issuance or modification of the Title V Permit or the application for issuance or modification of the State Permit to Operate, whichever is applicable, is due. This provision is not applicable to a source excluded from the requirement for a permit to operate as provided by 11 Miss. Admin. Code Pt. 2, R. 2.13.G. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(4).)

22. Application for a Permit to Operate: Except as otherwise specified in Part I, Condition 24 of this permit, the application for issuance or modification of the State Permit to Operate or the Title V Permit, whichever is applicable, is due twelve (12) months after beginning operation or such earlier date or time as specified in the Permit to Construct. The Permit Board may specify an earlier date or time for submittal of the application. Beginning operation will be assumed to occur upon certification of construction, unless the permittee specifies differently in writing. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(5).)

23. Operating Under a Permit to Construct: Except as otherwise specified in Part I, Condition 24 of this permit, upon submittal of a timely and complete application for issuance or modification of a State Permit to Operate or a Title V Permit, whichever is applicable, the applicant may continue to operate under the terms and conditions of the Permit to Construct and in compliance with the submitted application until the Permit Board issues, modifies, or denies the Permit to Operate. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(6).)

24. Application Requirements for a Permit to Operate for Moderate Modifications: For moderate modifications that require contemporaneous enforceable emissions reductions from more than one emission point in order to "net" out of PSD/NSR, the applicable Title V Permit to Operate or State Permit to Operate must be modified prior to beginning operation of the modified facilities. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(7).)

25. Compliance Testing: Regarding compliance testing:

    a) The results of any emissions sampling and analysis shall be expressed both in units consistent with the standards set forth in any Applicable Rules and Regulations or this permit and in units of mass per time.

    b) Compliance testing will be performed at the expense of the permittee.

    c) Each emission sampling and analysis report shall include but not be limited to the following:

        (1) detailed description of testing procedures;

        (2) sample calculation(s);

        (3) results; and

        (4) comparison of results to all Applicable Rules and Regulations and to emission limitations in the permit.

    (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.6.B(3), (4), and (6).)

B. GENERAL NOTIFICATION REQUIREMENTS

1. Within fifteen (15) days of beginning actual construction, the permittee must notify DEQ in writing that construction has begun. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(2).)

2. The permittee must notify DEQ in writing when construction does not begin within eighteen (18) months of issuance or if construction is suspended for eighteen (18) months or more. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.C(3).)

3. Upon the completion of construction or installation of an approved stationary source or modification, the applicant shall notify the Permit Board that construction or installation was

performed in accordance with the approved plans and specifications on file with the Permit Board. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(1).)

4. The Permit Board shall be promptly notified in writing of any change in construction from the previously approved plans and specifications or permit. If the Permit Board determines the changes are substantial, it may require the submission of a new application to construct with "as built" plans and specifications. Notwithstanding any provision herein to the contrary, the acceptance of an "as built" application shall not constitute a waiver of the right to seek compliance penalties pursuant to State Law. (Ref.: 11 Miss. Admin. Code Pt. 2, R. 2.5.D(2).)

SECTION 2
EMISSION POINT DESCRIPTION

The permittee is authorized to construct and operate, upon certification of construction, air emissions equipment, as described in the following table.

Emission Point ID	Description
AH-051 (F-1603)	FCC Catalyst Regenerator with an 81.4 MMBTU/hr start-up air preheat furnace (Formerly AA-053), equipped with an electrostatic precipitator (K-1603). (Formerly AA-051)

SECTION 3
EMISSION LIMITATIONS AND STANDARDS

Emission Point ID	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Limitation/Standard
AH-051 (Catalyst Regenerator)	Permit to Construct issued August 21, 2015 EPA Consent Decree (No. C-03-04650)	3.1	NOx	35.0 ppmvd @ 0% O_2 (365-day rolling average)
		3.2		70.0 ppmvd @ 0% O_2 (7-day rolling average)

3.1 For Emission Point AH-051, the permittee shall limit long-term (365-day rolling average) NOx emissions to 35.0 parts per million, volumetric, dry (ppmvd), corrected to 0% oxygen (O_2). This limit shall apply at all times that the Pascagoula FCCU is operating (including during startup, shutdown and malfunction).

(Ref.: Permit to Construct issued August 21, 2015 and Consent Decree between U.S. EPA and Chevron, No. C-03-04650, entered June 27, 2005)

3.2 For Emission Point AH-051, the permittee shall limit short-term (7-day rolling average) NOx emissions to 70.0 parts per million, volumetric, dry (ppmvd), corrected to 0% oxygen (O_2). This limit shall exclude periods of startup, shutdown, malfunction or FCCU feed hydrotreater outage if Chevron complies with the EPA-approved Hydrotreater Outage Plan (see Appendix A). This plan states that Chevron will only seek the hydrotreater outage exception to its short-term limit when the rate of imported FCCU feed exceeds 30 percent of the total FCCU feed rate as a result of a hydrotreater outage.

(Ref.: Permit to Construct issued August 21, 2015 and Consent Decree between U.S. EPA and Chevron, No. C-03-04650, entered June 27, 2005)

SECTION 4
WORK PRACTICES

Emission Point ID	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Work Practice
Intentionally Left Blank - No New Work Practices Are Being Established Through This Permit Action.				

SECTION 5.B
MONITORING AND RECORDKEEPING REQUIREMENTS

Emission Point ID	Applicable Requirement	Condition Number(s)	Pollutant/ Parameter	Monitoring/Recordkeeping Requirement
Intentionally Left Blank - No New Monitoring or Recordkeeping Requirements Are Being Established Through This Permit Action.				

SECTION 5.C
REPORTING REQUIREMENTS

Emission Point ID	Applicable Requirement	Condition Number(s)	Reporting Requirement
Intentionally Left Blank - No New Reporting Requirements Are Being Established Through This Permit Action.			

APPENDIX A

Chevron Hydrotreater Outage Plan
(revised March 27, 2009)

Jason M. Colletti
Safety, Environmental, Health
& Plant Protection Manager

Chevron Products Company
Chevron Pascagoula Refinery
A Chevron U.S.A. Inc., Division
250 Industrial Road
Pascagoula, MS 39581
Tel 228-938-4418
Fax 228-938-4682

March 27, 2009

CERTIFIED MAIL RETURN
RECEIPT NO. 7007 2680 0002 4438 5129

Director, Air Enforcement Division
Office of Regulatory Enforcement
U.S. Environmental Protection Agency
Mail Code 2242-A
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460-0001

CONSENT DECREE, U.S. V. CHEVRON U.S.A. INC., CASE NO. C 03-04650 (N.D. CAL.)
REVISED HYDROTREATER OUTAGE PLAN FOR CHEVRON PASCAGOULA REFINERY

Dear Sir or Madam:

In our NOx reducing catalyst additives demonstration period report for the Chevron Pascagoula Refinery FCCU dated February 27, 2009 we proposed to modify our Hydrotreater Outage Plan in order to clarify that the Pascagoula Refinery FCCU will only use the plan to obtain relief from its short-term NOx and SO_2 limits when it is feeding more than 30% of imported feed as a result of a hydrotreater outage. The attached proposed revision to the Chevron Hydrotreater Outage Plan (received from EPA November 20, 2007) reflects this modification.

Please note that in a separate email communication addressed to Mr. Shaun Burke of the U.S. Environmental Protection Agency on March 20, 2009 we have requested clarification regarding the specific meaning of the additive rate requirements in the Chevron Hydrotreater Outage Plan received from EPA November 20, 2007 that are expressed as a percentage of the "total daily catalyst addition rate."

If you have any questions or require additional information, please contact this office or Mr. Wes Beck at 228 938-4858.

Regards,

Jason Colletti

GA/cws

Attachment

cc: **CERTIFIED MAIL RETURN**
RECEIPT NO. 7007 2680 0002 4438 5136
Director, Air Enforcement Division
Office of Regulator Enforcement
c/o Matrix Environmental & Geotechnical Services
120 Eagle Rock Avenue
Suite 207
East Hanover, NJ 07936
Attn: Norma Eichlin

CERTIFIED MAIL RETURN
RECEIPT NO. 7007 2680 0002 4438 5143
Chief, Air Enforcement & EPCR Branch
Mail Code 4APTMD-AEEB
USEPA Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303

CERTIFIED MAIL RETURN
RECEIPT NO. 7007 2680 0002 4438 5150
Mississippi Department of Environmental Quality
Chief, Environmental Compliance & Enforcement Division
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39289

Electronic copies to:

neichlin@matrixegs.com
fentress.robert@epa.gov
foley.patrick@epa.gov

HT Outage Plan for the El Segundo, Pascagoula, Richmond and Salt Lake City refineries

1. All planned HT outages will be conducted, to the extent practicable, concurrent with any planned FCCU turnaround. EPA is aware that this element does not apply to unplanned HT outages.

2. Prior to any planned HT outage, the refinery will maximize storage of hydrotreated feed to the extent possible.

3. Whenever possible, refineries will schedule low sulfur FCCU feed purchases for delivery during HT outages.

4. During any HT outage the refinery will use hydrotreated feed to the maximum extent possible.

5. Upon conclusion of each HT outage, the refinery will submit a report to EPA identifying the periods of time that the HT outage plan was applicable rather than the short-term limit. This report will describe, in detail, the steps taken to comply with this HT outage plan for these periods. The report will contain all data (compiles on a daily average basis) including the concentrations of NOx and SO_2 necessary to document that each requirement of the plans were fully implemented.

El Segundo Refinery

6. It is EPA's understanding that Chevron will not need a HT Outage Plan in order to meet the short-term NOx emission limits for the El Segundo FCCU. Therefore, pending further discussions, the HT Outage Plan will not apply to NOx emissions from the El Segundo FCCU.

7. During any HT outage at the El Segundo refinery, Chevron will add SO_2 reducing catalyst additive at 10.0% of the total daily catalyst addition rate.

8. Chevron will begin adding catalyst additive at the maximum additive rate 2 weeks (14 days) prior to a known or planned HT outage when possible. In the event of an unplanned outage, Chevron will reach the maximum additive rate within 24 hours of the start of the HT outage. In any event, if the refinery is able to meet the short-term limit for SO_2, Chevron does not need to comply with any of the pollutant specific terms of the HT outage plan.

Pascagoula Refinery

9. Chevron included demonstration period data from periods when the FCCU feed included 0-30% of imported feed in the short-term limit setting dataset because this is considered normal operation. Consequently, Chevron will only claim relief from the short-term NOx and SO_2 limits when the rate of imported FCCU feed exceeds 30% of the total FCCU feed rate as a result of a hydrotreater outage. For any seven day average period the percentage of the total FCCU feed rate that is imported feed shall be determined as follows:

% imported FCCU feed = (Total feed – RDS produced feed) / Total feed * 100
Total feed = the 7-day average total FCCU feed rate (MBPD)
RDS produced feed = the 7-day average total RDS fractionator bottoms rate (MBPD)

10. During any HT outage, the Pascagoula refinery will use only non-platinum combustion promoter at the FCCU. Use of platinum combustion promoter will be a last resort if need to protect the unit safety.

11. During any HT outage at the Pascagoula refinery, Chevron will add NOx reducing catalyst additive at 2.0% of the total daily catalyst addition rate.

12. During any HT outage at the Pascagoula refinery, Chevron will add SO_2 reducing catalyst additive at 10.0% of the total daily catalyst addition rate.

13. Chevron will begin adding catalyst additive at the maximum additive rate 2 weeks (14 days) prior to a known or planned HT outage when possible. In the event of an unplanned outage, Chevron will reach the maximum additive rate within 24 hours of the start of the HT outage. In any event, if the refinery is able to meet the short-term limit for NOx or SO_2, Chevron does not need to comply with any of the pollutant specific terms of the HT outage plan.

Richmond Refinery

14. During any HT outage at the Richmond refinery, Chevron will use only non-platinum combustion promoter at the FCCU. Use of platinum combustion promoter will be a last resort if needed to protect the unit safety.

15. During any HT outage at the Richmond refinery, Chevron will add NOx reducing catalyst additive at 2.0% of the total daily catalyst addition rate.

16. During any HT outage at the Richmond refinery, Chevron will add SO_2 reducing catalyst additive at 10.0% of the total daily catalyst addition rate.

17. Chevron will begin adding catalyst additive at the maximum additive rate 2 weeks (14 days) prior to a known or planned HT outage when possible. In the event of an unplanned outage, Chevron will reach the maximum additive rate within 24 hours of the start of the HT outage. In any event, if the refinery is able to meet the short-term limit for NOx or SO_2, Chevron does not need to comply with any of the pollutant specific terms of the HT outage plan.

Salt Lake City Refinery

18. During any HT outage at the Salt Lake City refinery, Chevron will use only non-platinum combustion promoter at the FCCU. Use of platinum combustion promoter will be a last resort if needed to protect the unit safety

19. During any HT outage at the Salt Lake City refinery, Chevron will add NOx reducing catalyst additive at 2.0% of the total daily catalyst addition rate

20. During any HT outage at the Salt Lake City refinery, Chevron will add SO_2 reducing catalyst additive at 10.0% of the total daily catalyst addition rate.

21. Chevron will begin adding catalyst additive at the maximum additive rate 2 weeks (14 days) prior to a known or planned HT outage when possible. In the event of an unplanned outage, Chevron will reach the maximum additive rate within 24 hours of the start of the HT outage. In any event, if the refinery is able to meet the short-term limit for NOx or SO_2, Chevron does not need to comply with any of the pollutant specific terms of the HT outage plan.

22. As of the date of this letter, EPA will consider the short-term SO_2 emission limit for the purposes of the Salt Lake City HT outage plan to be 50 ppmvd @ 0% O_2 on a 7-day rolling average basis.

Compliance with this HT Outage Plan does not alleviate Chevron from compliance with the requirements of the Consent Decree outside of those specifically identify.

APPENDIX B

EPA Approval of FCCU NOx Limits
Chevron Pascagoula
(October 9, 2014)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

October 9, 2014

BY U.S. MAIL AND E-MAIL

Bruce Chinn
Refinery Manager
Pascagoula Refinery
Chevron Products Company
250 Industrial Road
Pascagoula, MS 39581-3201

Re: *United States et al. v. Chevron USA Inc.*, Civil Action No. C-03-04650 (N.D. Cal.) – Final FCCU NOx Limits for the Chevron Pascagoula Refinery

Dear Mr. Chinn:

EPA has reviewed Chevron's "Pascagoula FCCU NOx Reducing Additive Demonstration Period Report," dated February 27, 2009 (Demonstration Report), its "Revised Hydrotreater Outage Plan for the Chevron Pascagoula Refinery," dated March 27, 2009 (Revised Hydrotreater Outage Plan), and its "Response to EPA Presentation of 6/2/14 on Pascagoula FCCU NOx Demonstration Period" dated July 15, 2014 (July 2014 Response). As discussed with Chevron representatives in several conference calls since submission of the Demonstration Report, pursuant to Paragraph 13(b) of the above-referenced consent decree, EPA is establishing the final limits for nitrogen oxides (NOx) for the Chevron Pascagoula fluidized catalytic cracking unit (FCCU), as specified below.

In its Demonstration Report, Chevron proposed a long-term limit (365-day rolling average) for normal operations of 40.8 parts per million, volumetric, dry (ppmvd) NOx @ 0% O_2 and an alternate operating scenario long-term limit of 60.0 ppmvd NOx @ 0% O_2. Chevron proposed a short-term limit (7-day rolling average) for normal operations of 81.7 ppmvd NOx @ 0% O_2 and an alternate operating scenario short-term limit of 120.0 ppmvd NOx @ 0% O_2. In its July 2014 Response, Chevron proposed a revised long-term limit of 35.1 ppmvd NOx @ 0% O_2 and a revised short-term limit of 92.5 ppmvd NOx @ 0% O_2. EPA does not agree with the proposed numerical emission limits. After discussions with Chevron representatives, EPA understands Chevron has agreed to accept the limits established by EPA below.

Based on its analysis of the data during the demonstration, EPA determines that the long-term limit shall be 35.0 ppmvd NOx @ 0% O_2 on a 365-day rolling average basis and the short-

term limit shall be 70.0 ppmvd NOx @ 0% O_2 on a 7-day rolling average basis. The NOx long-term limit shall apply at all times that the Pascagoula FCCU is operating (including during startup, shutdown and malfunction). The NOx short-term limit shall exclude periods of startup, shutdown, malfunction, or FCCU feed hydrotreater outage if Chevron complies with an EPA-approved hydrotreater outage plan, but shall apply at all other times that the Pascagoula FCCU is operating. The limits are presented in the table below.

NOx Limits for the Chevron Pascagoula FCCU

Limit (ppmvd @ 0% O_2)	Chevron's Original Proposal	Chevron's Revised Proposal	EPA's Determination
365-day rolling average	Normal: 40.8 Alt. Scenario: 60.0	35.1	35.0
7-day rolling average	Normal: 81.7 Alt. Scenario: 120.0	92.5	70.0

EPA's analysis of the demonstration data incorporated Chevron's proposed revision to its hydrotreater outage plan, specifically that Chevron will only seek the hydrotreater outage exception to its short-term limit when the rate of imported FCCU feed exceeds 30 percent of the total FCCU feed rate as a result of a hydrotreater outage. The Revised Hydrotreater Outage Plan, dated March 27, 2009, is approved for the Pascagoula FCCU.

In accordance with Paragraph 13(d), Chevron shall operate the Pascagoula FCCU so as to comply with the EPA-established emission limits within ninety (90) days. As provided in Paragraph 99(a), Chevron shall apply for and make all reasonable efforts to incorporate these limits (including limitations on the treatment of emissions during periods of startup, shutdown malfunction, and hydrotreater outage, and during periods during which the Pascagoula FCCU is not operating, as provided above) into minor or major New Source Review and other applicable, federally enforceable permits for the Pascagoula FCCU, as soon as practicable, but in no event later than ninety (90) days following this determination.

If you have any questions regarding this letter, please contact Patrick Foley at (202) 564-7978.

Sincerely,

Phillip Brooks, Director
Air Enforcement Division

cc: Chief, Air Enforcement & EPCR Branch
Mail Code 4APTMD-AEEB
USEPA Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303

Mississippi Department of Environmental Quality
Chief, Environmental Compliance & Enforcement Division
Office of Pollution Control
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General Manager, Operational Excellence/
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Via e-mail:
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csullivan@matrixneworld.com