

Mark C. Dangler

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Toledo Division of Environmental Services
348 South Erie Street
Toledo, OH 43604

February 15, 2013

Attn: Mr. Peter C. Park

Re: Revision to Toledo Feedstock Optimization Air Services Application
BP-Husky Refining LLC, Toledo Refinery
Facility ID: 04-48-02-0007

Dear Mr. Park:

Enclosed is a revision to the air permit application for the Toledo Feedstock Optimization (TFO) Project originally submitted on October 19, 2012. For ease of processing, BP-Husky is resubmitting all elements of the original application (documents and forms) although the majority of the contents are unchanged. This revision represents the addition of a few new scope elements, clarification of a few process details, and updated emissions estimates for a few of the project sources. A summary of the main details of these changes, versus the original application, are outlined in Attachment A to this letter.

This application and cover letter are being submitted electronically via the Air Services system of the Ohio EPA as required. A paper copy of the cover letter and permit application are also being submitted to TDES to assist the local agency in its review process.

If you have any questions or concerns regarding this report, please do not hesitate to call Allen Ellett at 419-697-6064.

Sincerely,

A handwritten signature in black ink that reads 'Mark C. Dangler'.

Mark C. Dangler
President — BP-Husky Refining LLC

Attachments

cc: T. Brungard
A. F. Clink
A. R. Ellett
J. A. Indorf
S. D. Kolbush
W. M. Rupert
T. D. Spidle
N. E. Thurber
File: 4G8F-12 Feedstock Optimization Project PTIs

Attachment A

February Revisions to TFO Air Permit Application A0046815

Added project scope:

- The project will now include a new benzene waste water stripper to help treat increased desalter water flow rates expected from use of heavier crudes.
- Added a new Amine Stripper in the TRP Amine System to allow redistribution of the amine flows in anticipation of the addition of the Coker Gas Plant and need for different pressures in amine system
- New Vacuum 1 Tower, replacement in kind, with new metallurgy
- Adjusted steam balance and emissions

Revised emission estimates:

- Estimates of future potential SO₂ emission from affected process heaters have been increased slightly and are offset by a request for a slightly lower allowable SO₂ limit for the contemporaneous Reformer 3 heater.
- The estimate of H₂S emissions from Coker cutting water has been updated based on computer simulations of the water handling processes.

Revised Permit Language

- The TFO project SO₂ PSD netting analysis relies, in part, on an interim group SO₂ limit recently established by administrative permit P0111328 issued January 4, 2013. The exact details of this interim group limit are slightly different from that contemplated in the original TFO application submittal. This revised application is updated consistent with the group limit in the issued PTI, which is included as an attachment in revised Appendix G.
- GHG BACT limits for new combustion sources have been revised to be expressed as tons/yr of CO₂ emissions (not CO₂e) and periodic burner tuning requirements have been revised consistent with the newly issued Boiler MACT requirements (which require periodic tuning every 5 years for heaters with automatic O₂ trim control).

Other Changes/Updates

- Ohio SO₂ and H₂S modeling has been updated consistent with slight revisions to these emissions.