Monroe Energy

December 22, 2022

James Rebarchak
Southeast Regional Air Quality Program Manager
Pennsylvania Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

Re: Notification of RACT III Applicability [25 Pa. Code §129.115(a)] and Alternative RACT Compliance Analysis [25 Pa. Code §129.114(i)]
Title V Operating Permit No. 23-00003
Monroe Energy, LLC – Trainer, Delaware County, PA

Dear Mr. Rebarchak:

Monroe Energy, LLC (Monroe) is providing this summary of Reasonably Available Control Technology (RACT) compliance plan for the Monroe facility located in Trainer, Pennsylvania (Facility) in accordance with 25 Pa. Code §§129.111-129.115 (RACT III). This cover letter along with the included Appendix A, B and C represents the notification of applicability and compliance proposal required under 25 Pa. Code §129.115(a). The Facility is a major source of nitrogen oxide (NO_X) and volatile organic compound (VOC) emissions. Therefore, its NO_X and VOC emitting sources are potentially subject to several provisions of the RACT III Rule. This document also includes the analyses required under 25 Pa. Code §129.114(i) for affected sources at the Facility for an alternative RACT determination was previously approved by the Pennsylvania Department of Environmental Protection (PADEP) under 25 Pa. Code §129.99(e).

Facility Background and RACT III Rule Applicability

The Facility owns and operates a petroleum refinery located on the Delaware River in the Borough of Trainer, Delaware County, Pennsylvania. The Facility operates under PADEP TVOP No. 23-00003.

On November 12, 2022, PADEP published the RACT III rule at 25 Pa. Code §§129.111-129.115. The RACT III requirements or emissions limitations supersede the requirements or emissions limitations of a RACT permit previously issued in accordance with 25 Pa. Code §§129.91-129.95 and 129.96-129.100, except in cases where an existing RACT permit specifies more stringent requirements and/or emissions limitations. Compliance with applicable RACT III requirements or emissions limitations must be demonstrated no later than January 1, 2023.

The RACT III Rule applies to major NO_X and/or major VOC emitting facilities. 25 Pa. Code §121.1 defines major NO_X and VOC emitting facilities as follows:

- Major NO_X emitting facility – a facility-wide NO_X potential to emit (PTE) of greater than 100 tons per year (tpy).

- Major VOC emitting facility – a facility-wide VOC PTE of greater than 50 tpy.

The Facility-wide NO_X PTE is greater than 100 tpy and therefore, Monroe is a major NO_X emitting facility subject to the NO_X provisions of RACT III under 25 Pa. Code §129.111(a). The Facility-wide VOC PTE is greater than 50 tpy and therefore, Monroe is also a major VOC emitting facility subject to the VOC provisions of RACT III under 25 Pa. Code §129.111(a).

In accordance with 25 Pa. Code §129.115(a), Monroe is submitting this cover letter along with Appendix A (i.e., RACT III Rule Applicability Discussion), Appendix B (i.e., RACT III Rule Applicability and Compliance Summary Tables) and Appendix C (i.e., RACT III PADEP Written Notification Template Form) to PADEP no later than December 31, 2022. Please contact me at Elizabeth.Clapp@monroe-energy.com or 610-364-8395 or Matt Torell at Matt.Torell@monroe-energy.com or (610) 364-8399 if you have any additional questions.

Sincerely,
Monroe Energy LLC

Elizabeth Clapp, P.E.
Environmental Leader

cc: Matt Torell (Monroe)
Frank Dougherty (ALL4)
Roy Rakiewicz (ALL4)

Appendix A: RACT III Rule Applicability Discussion
Appendix B: RACT III Rule Applicability and Compliance Summary Tables
Appendix C: RACT III PADEP Written Notification Template Form

APPENDIX A -
RACT III RULE APPLICABILITY DISCUSSION

Monroe Energy

Appendix A: RACT III Applicability Discussion

Notification of Applicability and Compliance Proposal [25 Pa. Code §129.115(a)]

The following subsections provide the notification of applicability and compliance proposal required under 25 Pa. Code §129.115(a).

25 Pa. Code §129.115(a)(1) – Submission Deadline

Because the Facility was a major NO_X and VOC emitting facility prior to August 3, 2018, this submittal is being made on or before December 31, 2022 in accordance with 25 Pa. Code §129.115(a)(1)(i).

25 Pa. Code §129.115(a)(2) – Identification of Air Contamination Sources That Commenced Operation on or Before August 3, 2018

Table B-1 and B-2 of Appendix B provide the RACT III Rule Applicability Summary for NO_X and VOC, respectively. Tables B-1 and B-2 identify the following:

- Air contamination sources that are subject to a presumptive RACT requirement or RACT emissions limitation under 25 Pa. Code §129.112.

- Air contamination sources that are subject to an alternative RACT requirement or RACT emissions limitation under 25 Pa. Code §129.114.

Table B-3 of Appendix B identifies the sources that are exempt from RACT III and the basis for their exemption as follows:

- Air contamination sources that are exempt from 25 Pa. Code §§129.112-114 because they emit less than 1 tpy of NO_X and/or less than 1 tpy of VOC, in accordance with 25 Pa. Code §129.111(c).

- Air contamination sources that are exempt from 25 Pa. Code §§129.112-114 because they are already subject to certain Chapter 129 RACT requirements [i.e., §129.51, §129.52(a)-(k) and Table I categories 1-11, §§129.52a-129.52e, §§129.54-129.63a, §§129.64-129.69, §§129.71-129.75, §§129.77, and §§129.101-129.107], in accordance with 25 Pa. Code §129.111(a).

Source ID 701 (Cooling Towers), which consists of three cooling towers, and the LPG Truck Loading Rack and Piping (associated with Source ID 118, installed under Plan Approval Application 23-0003AD) commenced operation after August 3, 2018. Therefore, Source ID 701 and the LPG Truck Loading Rack and Piping do not meet the applicability criteria of 25 Pa. Code §129.111(a) and are not subject to RACT III.

25 Pa. Code §129.115(a)(3) – Identification of Air Contamination Sources That Commenced Operation After August 3, 2018

Because the Facility was a major NO_X and VOC emitting facility prior to August 3, 2018, 25 Pa. Code §129.111(b) does not apply.

25 Pa. Code §129.115(a)(4) – Identification of Air Contamination Sources That Emit Less Than 1 TPY

Table B-3 of Appendix B identifies the air contamination source that emits less than 1 tpy of VOC.

25 Pa. Code §129.115(a)(5) – Air Contamination Source Information (Commenced Operation on or Before August 3, 2018)

Table B-5 of Appendix B provides a Source Inventory that includes a description, make, model, location (as available) of each RACT III affected source at the Facility. The applicable RACT requirement or RACT emissions limitation for each source is provided in the RACT III Rule Applicability Summary as Table B-1 and B-2 of Appendix B.

For Source ID 735 (Kerosene/HCN HTU Heater) and Source ID 736 (Diesel HTU Heater), which require case-by-case RACT determinations for NO_X, and Source ID 101 (FCC Unit), Source ID 104 (Marine Vessel Ballasting), Source ID 105 (Marine Vessel Loading), Source ID 111 (Cooling Towers), Source ID 118 (Railcar Loading LPG & Butane), which require case-by-case determinations for VOC, Monroe has determined that the alternative RACT requirements that were previously approved by PADEP under 25 Pa. Code §129.99 continue to represent RACT for these sources. The analyses provided below demonstrate that the case-by-case RACT determinations previously approved by PADEP under 25 Pa. Code §129.99(e) remain valid. Monroe proposes to comply with the RACT III Rule by continuing to comply with the applicable RACT conditions of the current TVOP No. 23-00003 for the referenced sources at the Facility. Monroe will meet the January 1, 2023 compliance deadline of the RACT III Rule through continued compliance with these conditions.

25 Pa. Code §129.115(a)(6) – Air Contamination Source Information (Commenced Operation After August 3, 2018)

Because the Facility was a major NO_X and VOC emitting facility prior to August 3, 2018, 25 Pa. Code §129.115(a)(6) does not apply.

25 Pa. Code §129.115(a)(7) – Air Contamination Source Information (Sources That Emit Less Than 1 TPY)

Table B-5 of Appendix B provides a Source Inventory that includes a description, make, model, and location (as available) of the air contamination source that have a potential to emit of less than 1 tpy of VOC. The corresponding PTE calculation is shown in Table B-4 of Appendix B.

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Alternative RACT Compliance [25 Pa. Code §129.114(a)]

In accordance with 25 Pa Code §129.114(d), Monroe has developed case-by-case alternative RACT analyses for the three sources at the identified in Table 1.

Table 1
Summary of Sources that Require Case-By-Case RACT Determinations

Source ID	Source Name	Pollutant	RACT III Citation
101	FCC Unit	NO_X	25 Pa. Code §129.114(b)
130	Peabody Heater	NO_X	25 Pa. Code §129.114(b)
702	ULSG[1] Cooling Tower	VOC	25 Pa. Code §129.114(c)

For Source IDs 101 and 130, alternative RACT determination were previously proposed by Monroe under 25 Pa Code §129.99(b) and approved by PADEP under 25 Pa Code §129.99(e) because the combustion sources were not subject a unit-specific presumptive RACT limit under 25 Pa Code §129.97 and NO_X emissions were greater than five tons per year each. New case-by-case alternative RACT analyses are required under RACT III because the sources cannot meet the new presumptive limit for combustion sources with a heat input of greater than 20 MMBtu/hr under 25 Pa Code §129.112(k). Monroe has proposed alternative RACT determinations in accordance with 25 Pa Code §129.114(d).

Source ID 702 was not in existence on or before July 20, 2012 and was not subject to RACT II under 25 Pa Code §129.96. Source ID 702 is subject to RACT III under 25 Pa Code §129.96. Because there is no applicable unit-specific presumptive RACT limit and its PTE of VOC is greater than 2.7 tons per year, Monroe has proposed an alternative VOC RACT determination in accordance with 25 Pa Code §129.114(d).

Monroe is submitting a Significant Operating Permit Modification Application under separate cover that includes the case-by-case RACT determinations and supporting information for the sources identified in Table 1.

Analysis of Alternative RACT Compliance [25 Pa. Code §129.114(i)]

In accordance with 25 Pa Code §129.114(i), Monroe has developed case-by-case alternative RACT analyses for the sources at the identified in Table 2. For each source identified in Table 2, the alternative RACT requirement or limitation previously approved by PADEP under 25 Pa Code §129.99(e), assures compliance with the provisions in 25 Pa Code §§(a)-(c) and (e)-(h), except for sources subject to §§129.112(c)(11) or (i)-(k). The information provided herein for the sources identified in Table 2 meets the requirements of 25 Pa Code §129.114(i).

[1] Ultra-Low Sulfur Gasoline

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Table 2
Additional Case-By-Case RACT Determinations Under 25 Pa. Code §129.114(i)

Source ID	Source Name	RACT III Citation
101	FCC Unit	25 Pa. Code §129.114(c)
104	Marine Vessel Ballasting	25 Pa. Code §129.114(c)
105	Marine Vessel Loading	25 Pa. Code §129.114(c)
111	Cooling Towers	25 Pa. Code §129.114(c)
118	Railcar Loading LPG & Butane	25 Pa. Code §129.114(c)
735	Kerosene/HCN HTU Heater	25 Pa. Code §129.114(b)
736	Diesel HTU Heater	25 Pa. Code §129.114(b)

There are no applicable unit-specific presumptive RACT VOC limits for Source IDs 101, 104, 105, 111, and 118 and their individual potential to emit VOC are each greater than 2.7 tons per year. There are no applicable unit-specific presumptive RACT NO_X limits for Source IDs 735 and 736 and their potential to emit NO_X are each greater than five tons per year.

25 Pa. Code §129.114(i)(1)(i)(A) – Identification of New Air Cleaning Devices, Air Pollution Control Technologies, or Techniques

Monroe has reviewed entries into the RACT/Best Available Control Technology (BACT)/Lowest Achievable Emissions Rate (LAER) Clearinghouse (RBLC) to determine if any new control technologies are available that can be applied to the sources identified in Table 2. No new control technologies were identified for the two heaters (Source ID 735 and Source ID 736) and the available controls remain the same as those identified the analysis submitted under RACT II [i.e., selective catalytic reduction (SCR), low NO_X burners (LNB), and ultra-low NO_X burners (ULNB)]. The current RACT emissions controls (i.e., operate and maintain the source in accordance with good operating practices and manufacturer specifications) for the heaters are consistent with recent and historical NO_X BACT determinations for each source. No new control technologies were identified for the five sources subject to 25 Pa. Code §129.114(c) (Source ID 101, Source ID 104, and Source ID 105, Source ID 111, and Source ID 118) and the available controls remain the same as the RACT analysis submitted under RACT II (i.e., good operation practices). The current RACT emissions controls (i.e., operate and maintain the source in accordance with good operating practices and manufacturer specifications) for these sources are consistent with recent and historical BACT determinations for each source. Based on process knowledge and conversations with refinery engineers and equipment vendors, Monroe has determined that no fundamentally different air pollution control devices or technologies have been demonstrated in practice since RACT II. Based on the evaluation described above, Monroe has determined that there are no new control technologies available for NO_X or VOC control of the sources identified in Table 2.

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25 Pa. Code §129.114(i)(1)(i)(B) – List Previously-Identified Technically Feasible Controls

Technically feasible air pollution control technologies previously identified under 25 Pa. Code §§129.92(b)(1)-(3) that were included in Monroe's 25 Pa. Code §129.99(d) RACT II submittal are provided in Table 3.

Table 3
Previously Identified Technically Feasible Air Pollution Control Technologies Under 25 Pa. Code §§129.92(b)(1)-(3)

Source ID	Source Description	Pollutant	Control Technology	Cost per Ton of Pollutant Removed
101	FCC Unit	VOC	Good Operating Practices	N/A – The source currently uses the top identified control technology for VOC emissions for FCC Unit which is thermal oxidation (i.e., CO Boiler) and good operating practices.
			Thermal Oxidation	
104	Marine Vessel Ballasting	VOC	Good Operating Practices	N/A – VOC RACT for the source continued the requirement that 98% of the total volume of receipts of crude oil and gasoline during each calendar year be delivered to the Refinery in vessels which do not ballast, such as barges, or in vessels which do not emit VOC when ballasted, such as tankers using SBT.
105	Marine Vessel Loading	VOC	Good Operating Practices	N/A – The source currently uses all of the identified feasible control technologies for VOC emissions from marine vessel loading and a control cost analysis was therefore not conducted.
			MVR System with Vapor Combustion	
111	Cooling Towers	VOC	Good Operating Practices	N/A – The only technically feasible control technology for the source is good operating practices.
118	Railcar Loading LPG & Butane	VOC	Good Operating Practices	N/A – The source currently uses the top identified control technology for VOC emissions for the railcar Vapor Combustion loading LPG and butane operations.
			Vapor Combustion	
735	Kerosene/HCN HTU Heater	NO_X	ULNB	$8,535
			LNB	$12,001
			SCR	$15,300
			FGR + LNB	$12,479
736	Diesel HTU Heater	NO_X	ULNB	$10,541
			LNB	$8,398

25 Pa. Code §129.114(i)(1)(i)(C) – Summary of Previous Economic Feasibility Analyses

As part of the Facility's 25 Pa. Code §129.99(d) RACT submittal, Monroe performed an analysis to determine which, if any, of the potential add-on control technologies were economically feasible using the methods presented in the "EPA Air Pollution Control Cost Manual" (Sixth Edition, EPA/452/B-02-0001, January 2002), as amended. A summary of the economic feasibility analyses submitted under 25 Pa. Code §129.99(d) has been provided above as Table 3. For Source IDs that already use the highest form of control or where no additional feasible control technologies have been identified, the cost per ton of pollutant removed column has been marked as "N/A".

25 Pa. Code §129.114(i)(1)(i)(D) – Statement of Economic Infeasibility

Monroe has evaluated the economic feasibility summaries provided under 25 Pa. Code §129.114(i)(1)(i)(C) and has determined that the cost effectiveness remains equal to or greater than $7,500 per ton of NO_X and $12,000 per ton of VOC emissions. The cost of the control technologies evaluated have not changed considerably since the analysis was performed in 2016 and, considering increases the cost of fuel and in certain economic indicators such as the Consumer Price Index (CPI), the control cost in 2022 dollars is only expected to have increased. Therefore, the control technologies for which cost effectiveness was evaluated in Monroe's 25 Pa. Code §129.99(d) RACT submittal remain economically infeasible.

25 Pa. Code §129.114(i)(1)(i)(E) – Additional Information

Monroe will provide additional information to support the Alternative RACT Compliance Analysis included herein if requested by PADEP.

Alternative RACT Compliance Summary

Based on the 25 Pa. Code §129.114(i) analysis provided herein, Monroe has determined that the alternative RACT requirements and/or RACT emissions limitations previously approved by PADEP under 25 Pa. Code §129.99(e) continue to be RACT for the sources evaluated. Monroe proposes to comply with the RACT III by continuing to comply with the applicable RACT conditions of TVOP No. 23-00003. Monroe will meet the January 1, 2023 compliance deadline of the RACT III Rule through continued compliance with these conditions.

Monroe Energy

Certification of Alternative RACT Compliance Analysis

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this 25 Pa. Code §129.114(i) Alternative RACT Compliance Analysis are true, accurate, and complete.

Mark Schuck	Senior VP, Trainer Complex
Name of Responsible Official	Title of Responsible Official
	December 21, 2022
Signature of Responsible Official	Date

RACT III Rule Compliance and Recordkeeping

In accordance with 25 Pa. Code §129.115(f), Monroe will keep sufficient records to assure compliance with the RACT III Rule including continued compliance with the RACT-specific recordkeeping conditions of the TVOP summarized in Table B-6 of Appendix B. In accordance with 25 Pa. Code §129.115(i), Monroe will record each adjustment conducted under the procedures in §129.112(b) for combustion units or process heaters subject to §129.112(b). Also, per 25 Pa. Code §129.115(k), all records will be maintained for at least five years, and will be made available to PADEP upon receipt of a written request. Compliance with the applicable RACT III Rule requirements or emissions limitations will be achieved no later than January 1, 2023.

APPENDIX B -
RACT III RULE APPLICABILITY AND COMPLIANCE SUMMARY TABLES

Table B-1
RACT III Rule Applicability Summary - NO_X
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Source Capacity/ Throughput	Fuel/ Throughput Material	NO_X Permit Limitation/PTE	RACT III Applicability		
					Classification	Citation	NO_X Limitation/ Requirement
034	Boiler 9	349.6 MMBtu/hr	Refinery Fuel Gas or Natural Gas	0.1 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(i) and (iv)	Natural gas emissions limit of 0.10 lb/MMBtu and refinery gas emissions limit of 0.25 lb/MMBtu.
035	Boiler 10	349.6 MMBtu/hr	Refinery Fuel Gas or Natural Gas	0.1 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(i) and (iv)	Natural gas emissions limit of 0.10 lb/MMBtu and refinery gas emissions limit of 0.25 lb/MMBtu.
053	Boiler 14	349.6 MMBtu/hr	Refinery Fuel Gas or Natural Gas	0.0077 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(i) and (iv)	Natural gas emissions limit of 0.10 lb/MMBtu and refinery gas emissions limit of 0.25 lb/MMBtu.
090	Existing Emergency Compression Ignition Engines <500 HP	Four Emergency Generator Engines with ratings of 255, 420, 420, and 270 horsepower (HP)	Diesel	N/A	Lean burn stationary internal combustion engine rated less than 500 bhp	§129.112(c)(6)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
091	Existing Emergency Compression Ignition Engines (IC <30 Liter)	Two Emergency Generator Engines with ratings of 490 and 619 HP	Diesel	N/A	Lean burn stationary internal combustion engine rated less than 500 bhp, and emergency standby engines that operate less than 500 hours in a 12-month rolling period	§129.112(c)(6) and (10)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
092	Yanmar CI RICE (LP Basement Godwin Pump)	28 bhp	N/A	N/A	Lean burn stationary internal combustion engine rated less than 500 bhp, and rich burn stationary internal combustion engines rated less than 100 bhp	§129.112(c)(6) and (7)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
101	FCC Unit	2,167 bbl/hr	Gas Oil and Coke-Regenerator	654.5 tpy	NO_X air contamination source with PTE > 5 ton/yr NO_X	§129.114(b)	Case-by-case RACT determination.
102	Claus Sulfur Recovery Plant	3.7 tons/hr Sulfur	Fuel Gas	N/A	Boiler and combustion source with an individual rated gross heat input less than 20 MMBtu/hr	§129.112(c)(4)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
103	Main Flare	1 bbl/hr Fuel Gas	Fuel Gas or Natural Gas	69 tpy	Flare used primarily for air pollution control	§129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
122	Back-up Flare	N/A	Natural Gas	N/A	Flare used primarily for air pollution control	§129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
130	Peabody Heater	74 MMBtu/hr	Natural Gas	7.6 tpy	NO_X air contamination source with PTE > 5 ton/yr NO_X	§129.114(b)	Case-by-case RACT determination.

Table B-1
RACT III Rule Applicability Summary - NO_X
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Source Capacity/ Throughput	Fuel/ Throughput Material	NO_X Permit Limitation/PTE	RACT III Applicability		
					Classification	Citation	NO_X Limitation/ Requirement
131	AWWTP Emergency Generator Engine	100 gal/hr	Diesel	N/A	Emergency standby engine operating less than 500 hours in a 12-month rolling period	§129.112(c)(10)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
733	FCCU Feed Heater	63 MMBtu/hr	Fuel Gas	0.045 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.
735	Kerosene/HCN HTU Heater	23 MMBtu/hr	Refinery Fuel Gas	14.32 tpy	NO_X air contamination source with PTE > 5 ton/yr NO_X	§129.114(b) and §129.114(i)	Case-by-case RACT determination.
736	Diesel HTU Heater	39 MMBtu/hr	Refinery Fuel Gas	24.36 tpy	NO_X air contamination source with PTE > 5 ton/yr NO_X	§129.114(b) and §129.114(i)	Case-by-case RACT determination.
737	Naphtha HDS Heater	76 MMBtu/hr	Refinery Fuel Gas	0.2 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.
738	Platformer Feed Heater	913 MMBtu/hr	Refinery Fuel Gas	0.12 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.
739	Isocracker Splitter Reboiler	50 MMBtu/hr	Refinery Fuel Gas	0.2 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.
740	D2/VGO Hydrotreater Feed Heater	76 MMBtu/hr	Refinery Fuel Gas	0.45 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.
741	VCD 541 VAC Heater	56 MMBtu/hr	Refinery Fuel Gas	0.25 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.
742	VCD 542 VAC Heater	56 MMBtu/hr	Refinery Fuel Gas or Natural Gas	0.25 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.
743	ACD 542 VAC Heater	72 MMBtu/hr	Refinery Fuel Gas or Natural Gas	0.25 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.
744	ACD 543 Crude Heater	514 Mcf/hr	Refinery Fuel Gas	0.2 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.
745	ACD 544 Crude Heater	514 Mcf/hr	Refinery Fuel Gas	0.2 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.
746	VCD 544 VAC Heater	229 Mcf/hr	Refinery Fuel Gas	0.06 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.

Table B-1
RACT III Rule Applicability Summary - NO_X
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Source Capacity/ Throughput	Fuel/ Throughput Material	NO_X Permit Limitation/PTE	RACT III Applicability		
					Classification	Citation	NO_X Limitation/ Requirement
C01	CO Boiler	N/A	N/A	N/A	Catalytic Oxidizer used primarily for air pollution control	§129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
C102	SRU Incinerator	N/A	N/A	N/A	Incinerator used primarily for air pollution control	§129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
747	Reactor Effluent Heater H-124-01	99.6 MMBtu/hr	Refinery Fuel Gas	0.035 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.
748	Stripper Reboiler Heater H-124-02	44.2 MMBtu/hr	Refinery Fuel Gas	0.035 lb/MMBtu	Refinery gas-fired combustion unit or process heater with a rated heat input greater than or equal to 50 MMBtu/hr	§129.112(g)(1)(iv)	Refinery gas emissions limit of 0.25 lb/MMBtu.

Table B-2
RACT III Rule Applicability Summary - VOC
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Source Capacity/ Throughput	Fuel/ Throughput Material	VOC Permit Limitation/PTE	RACT III Applicability		
					Classification	Citation	VOC Limitation/ Requirement
034	Boiler 9	349.6 MMBtu/hr	Refinery Fuel Gas or Natural Gas	2 tpy	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
035	Boiler 10	349.6 MMBtu/hr	Refinery Fuel Gas or Natural Gas	2 tpy	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
053	Boiler 14	349.6 MMBtu/hr	Refinery Fuel Gas or Natural Gas	1.98 tpy	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
090	Existing Emergency Compression Ignition Engines <500 HP	Four Emergency Generator Engines with ratings of 255, 420, 420, and 270 horsepower (HP)	Diesel	N/A	Lean burn stationary internal combustion engine rated less than 500 bhp	§129.112(c)(6)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
091	Existing Emergency Compression Ignition Engines (IC <30 Liter)	Two Emergency Generator Engines with ratings of 490 and 619 HP	Diesel	N/A	Lean burn stationary internal combustion engine rated less than 500 bhp, and emergency standby engines that operate less than 500 hours in a 12-month rolling period	§129.112(c)(6) and (10)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
092	Yanmar CI RICE (LP Basement Godwin Pump)	28 bhp	N/A	N/A	Lean burn stationary internal combustion engine rated less than 500 bhp, and rich burn stationary internal combustion engines rated less than 100 bhp	§129.112(c)(6) and (7)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
101	FCC Unit	2,167 bbl/hr	Gas Oil and Coke-Regenerator	8.1 tpy	VOC air contamination source with PTE >2.7 ton/yr VOC	§129.114(c)	Case-by-case RACT determination.
102	Claus Sulfur Recovery Plant	3.7 tons/hr Sulfur	Fuel Gas	N/A	VOC air contamination source with PTE <2.7 ton/yr VOC	§129.112(c)(2)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
103	Main Flare	1 bbl/hr Fuel Gas	Fuel Gas or Natural Gas	N/A	Flare used primarily for air pollution control	§129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
104	Marine Vessel Ballasting	8.5 Th bbl/hr	Crude Oil	9.2 tpy	VOC air contamination source with PTE >2.7 ton/yr VOC	§129.114(c) and §129.114(i)	Case-by-case RACT determination.
105	Marine Vessel Loading	108.6 Th gal/hr	Gasoline	N/A	VOC air contamination source with PTE >2.7 ton/yr VOC	§129.114(c) and §129.114(i)	Case-by-case RACT determination.

Table B-2
RACT III Rule Applicability Summary - VOC
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Source Capacity/ Throughput	Fuel/ Throughput Material	VOC Permit Limitation/PTE	RACT III Applicability		
					Classification	Citation	VOC Limitation/ Requirement
111	Cooling Towers	60 Th bbl/hr	Cooling Water	7.59 tpy	VOC air contamination source with PTE >2.7 ton/yr VOC	§129.114(c) and §129.114(i)	Case-by-case RACT determination.
118	Railcar Loading LPG & Butane	N/A	LPG and Butane	3.94 tpy	VOC air contamination source with PTE >2.7 ton/yr VOC	§129.114(c) and §129.114(i)	Case-by-case RACT determination.
122	Back-up Flare	N/A	Natural Gas	N/A	Flare used primarily for air pollution control	§129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
130	Peabody Heater	74 MMBtu/hr	Natural Gas	N/A	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
131	AWWTP Emergency Generator Engine	100 gal/hr	Diesel	N/A	Emergency standby engine operating less than 500 hours in a 12-month rolling period	§129.112(c)(10)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
702	ULSG Cooling Tower	612,000 gal/hr	Cooling Water	6.02 tpy	VOC air contamination source with PTE >2.7 ton/yr VOC	§129.114(c) and §129.114(i)	Case-by-case RACT determination.
733	FCCU Feed Heater	63 MMBtu/hr	Fuel Gas	2.2 tpy	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
735	Kerosene/HCN HTU Heater	23 MMBtu/hr	Refinery Fuel Gas	N/A	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
736	Diesel HTU Heater	39 MMBtu/hr	Refinery Fuel Gas	3.4 tpy	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
737	Naphtha HDS Heater	76 MMBtu/hr	Refinery Fuel Gas	N/A	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
738	Platformer Feed Heater	913 MMBtu/hr	Refinery Fuel Gas	N/A	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
739	Isocracker Splitter Reboiler	50 MMBtu/hr	Refinery Fuel Gas	N/A	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
740	D2/VGO Hydrotreater Feed Heater	76 MMBtu/hr	Refinery Fuel Gas	N/A	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
741	VCD 541 VAC Heater	56 MMBtu/hr	Refinery Fuel Gas	N/A	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
742	VCD 542 VAC Heater	56 MMBtu/hr	Refinery Fuel Gas or Natural Gas	N/A	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.

Table B-2
RACT III Rule Applicability Summary - VOC
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Source Capacity/ Throughput	Fuel/ Throughput Material	VOC Permit Limitation/PTE	RACT III Applicability		
					Classification	Citation	VOC Limitation/ Requirement
743	ACD 542 VAC Heater	72 MMBtu/hr	Refinery Fuel Gas or Natural Gas	< 1 tpy	Combustion unit subject to §129.111	§129.111(c)	Exempt on the basis of a PTE < 1 tpy.
744	ACD 543 Crude Heater	514 Mcf/hr	Refinery Fuel Gas	N/A	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
745	ACD 544 Crude Heater	514 Mcf/hr	Refinery Fuel Gas	N/A	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
746	VCD 544 VAC Heater	229 Mcf/hr	Refinery Fuel Gas	5.5 tpy	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
C01	CO Boiler	N/A	N/A	N/A	Catalytic Oxidizer used primarily for air pollution control	§129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
C102	SRU Incinerator	N/A	N/A	N/A	Incinerator used primarily for air pollution control	§129.112(c)(8)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
747	Reactor Effluent Heater H-124-01	99.6 MMBtu/hr	Refinery Fuel Gas	3.15 tpy	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.
748	Stripper Reboiler Heater H-124-02	44.2 MMBtu/hr	Refinery Fuel Gas	3.15 tpy	Combustion unit subject to §129.111	§129.112(d)	Install, maintain, and operate the source in accordance with the manufacturer's specifications and with good operating practices.

Table B-3
Sources Exempt From RACT III - VOC
Monroe Energy, LLC - Trainer, PA

Source ID	Source Description	Reason for Exemption	RACT III Citation
743	ACD 542 VAC Heater	Exempt on the basis of a PTE < 1 tpy.	25 Pa. Code §129.111(c)
106	Process Drains & H_2O Sep.	The source is subject to 25 Pa. Code §129.55.	25 Pa. Code §129.111(a)
112	Purging & Sampling, etc.	The source is subject to 25 Pa. Code §129.58.	25 Pa. Code §129.111(a)
113	LPG Recovery Unit[(a)]	The source is subject to 25 Pa. Code §129.58.	25 Pa. Code §129.111(a)
114	RACT Fugitive Equipment	The source is subject to 25 Pa. Code §129.58.	25 Pa. Code §129.111(a)
115	NSPS Fugitive Equipment	The source is subject to 25 Pa. Code §129.58.	25 Pa. Code §129.111(a)
123	#66 Ext. Float 43 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
124	#67 Ext. Float 43 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
125	#68 Ext. Float 43 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
126	#95 Ext. Float 59 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
127	#96 Ext. Float 59 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
128	MACT Fugitives	The source is subject to 25 Pa. Code §129.58.	25 Pa. Code §129.111(a)
133	Benzene Waste Operations	The source is subject to 25 Pa. Code §129.55.	25 Pa. Code §129.111(a)
134	#132 Int. Float 15 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
136	#151 Ext. Float 53 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
137	#152 Int. Float 61 Mbbl	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
138	#153 Ext. Float 53 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
139	#154A Int. Float 105 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
140	#155 Int. Float 63 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
141	#156 Ext. Float 53 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
142	#157 Ext. Float 77 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
143	#159 Ext. Float 79 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
144	#161 Ext. Float 86 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
145	#162 Ext. Float 82 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
146	#163 Ext. Float 82 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
147	#164 Ext. Float 83 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
148	#165 Ext. Float 82 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
149	#166 Ext. Float 83 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
150	#168 Int. Float 79 Mbbls.	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
151	#169 Ext. Float 78 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)

Table B-3
Sources Exempt From RACT III - VOC
Monroe Energy, LLC - Trainer, PA

Source ID	Source Description	Reason for Exemption	RACT III Citation
152	#170 Ext. Float 71 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
153	#171 Int. Float 83 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
154	#172 Ext. Float 81 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
155	#174 Ext. Float 154 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
156	#175 Ext. Float 151 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
157	#178 Ext. Float 80 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
160	#181 Ext. Float 129 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
161	#182 Ext. Float 129 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
162	#184 Ext. Float 26 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
163	#185 Ext. Float 150 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
164	#186 Ext. Float 151 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
165	#93 Ext. Float 244 Mbbl	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
166	#94 Ext. Float 243 Mbbl	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
180	#54 Cone Roof Tk 54 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
190	#134 Int. Float 15 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
194	#160 Int. Float 85 Mbbls	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
215	NSPS New Fugitive Equipment	The source is subject to 25 Pa. Code §129.58.	25 Pa. Code §129.111(a)
300	Miscellaneous MACT Group 2 Tanks	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
501	Spheroid 501 (1.26 MMgal)	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
502	Spheroid 502 (1.26 MMgal)	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
513	Spheroid 513 (1.26 MMgal)	The source is subject to 25 Pa. Code §129.56.	25 Pa. Code §129.111(a)
730	Reformer Unit Fugitives	The source is subject to 25 Pa. Code §129.58.	25 Pa. Code §129.111(a)

[(a)] VOC emissions from the LPG Recovery Unit are limited to 4.6 tpy in the Refinery's current TVOP. However, there are no direct process vents associated with the LPG Recovery Unit and potential emissions of VOC are fugitive in nature and may occur through leaking components. Therefore, fugitive VOC emissions from the LPG Recovery Unit are subject to the standards codified at 25 Pa. Code §129.58, as specified in the conditions for TVOP No. 23-00003 Source ID 114 – RACT Fugitive Equipment.

Table B-4
RACT III Rule Applicability Summary - PTE
Monroe Energy, LLC - Trainer, PA

Source Name	Capacity (MMBtu/hr)	VOC Emissions Limit	Emission Limit Units	PTE (tpy) [a]	RACT III Non-Applicability/Exemption Criteria
ACD 542 VAC Heater	72	0.18	lbs/hr[b]	0.79	Exempt - PTE < 1 tpy for VOC

[a] Calculations assume the following:

8,760	hr/yr - Heater
2,000	lb/ton

[b] TVOP 23-00003 has an emission limit of 0.18 lb/hr for Source ID 743 in accordance with Section D, Source ID 743, Condition No. 002.

Table B-5
RACT III Source Inventory
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Source Description	Make	Model	Location
034	Boiler 9	349.6 Million British Thermal Unit per Hour (MMBtu/hr) Boiler	B&W	FM 160-124	Boiler House
035	Boiler 10	349.6 MMBtu/hr Boiler	B&W	FM 160-124	Boiler House
053	Boiler 14	349.6 MMBtu/hr Boiler	Rentech	Serial No. 2001-29	Boiler House
090	Existing Emergency Compression Ignition Engines <500 HP	Four Emergency Generators with ratings of 255, 420, 420, and 270 horsepower (HP)	Two Cummins and Two Caterpillar	Cummins: NT-855-F1 (255 HP) and HT-855-GS2 (270 HP) Caterpillar: 3406C (420 HP) and 3406B DIT (420 HP)	Main Refinery
091	Existing Emergency Compression Ignition Engines (IC <30 Liter)	Four Emergency Generators with ratings of 490 and 619 HP	Caterpillar	C-15	Main Refinery
092	Yanmar CI RICE (LP Basement Godwin Pump)	Reciprocating Internal Combustion Engine	Custom	Custom	Main Refinery
101	FCC Unit	Fluid Catalytic Cracking Unit	Custom	Custom	Main Refinery
102	Claus Sulfur Recovery Plant	Sulfur Recovery Plant	Custom	Custom	Main Refinery
103	Main Flare	Flare	Custom	Custom	Main Refinery
104	Marine Vessel Ballasting	Marine Vessel Ballasting	Custom	Custom	Main Refinery
105	Marine Vessel Loading	Marine Vessel Loading	Custom	Custom	Main Refinery
111	Cooling Towers	Cooling Towers	Custom	Custom	Main Refinery
118	Railcar Loading LPG & Butane	Railcar Loading	Custom	Custom	Main Refinery
122	Back-up Flare	Flare	Custom	Custom	Main Refinery
130	Peabody Heater	74 MMBtu/hr Heater	Custom	Custom	Main Refinery
131	AWWTP Emergency Generator	1,793 Standard Cubic Foot per Minute (scfm) Emergency Generator	Caterpillar	GENSET 3508	Main Refinery
702	ULSG Cooling Tower	One Cooling Tower	Cooling Tower Depot	Custom	Main Refinery
733	FCCU Feed Heater	95 MMBtu/hr Heater	Onquest	Custom	Main Refinery
735	Kerosene/HCN HTU Heater	23 MMBtu/hr Heater	Petrochem	Custom	Main Refinery
736	Diesel HTU Heater	39 MMBtu/hr Heater	Petrochem	Custom	Main Refinery
737	Naphtha HDS Heater	65 MMBtu/hr Heater	Foster Wheeler	Custom	Main Refinery
738	Platformer Feed Heater	913 MMBtu/hr Heater	Custom	Custom	Main Refinery
739	Isocracker Splitter Reboiler	50 MMBtu/hr Heater	Custom	Custom	Main Refinery

Table B-5
RACT III Source Inventory
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Source Description	Make	Model	Location
740	D2/VGO Hydrotreater Feed Heater	76 MMBtu/hr Heater	Custom	Custom	Main Refinery
741	VCD 541 VAC Heater	56 MMBtu/hr Heater	Custom	Custom	Main Refinery
742	VCD 542 VAC Heater	56 MMBtu/hr Heater	Custom	Custom	Main Refinery
743	ACD 542 VAC Heater	72 MMBtu/hr Heater	Custom	Custom	Main Refinery
744	ACD 543 Crude Heater	13,664 scfm Heater	Petrochem	Custom	Main Refinery
745	ACD 544 Crude Heater	6,260 scfm Heater	Petrochem	Custom	Main Refinery
746	VCD 544 VAC Heater	16,792 scfm Heater	Petrochem	Custom	Main Refinery
C01	CO Boiler	Direct Flame Incinerator With Heat Exchange	Custom	Custom	Main Refinery
C102	SRU Incinerator	Direct Flame Incinerator Without Heat Exchange	Custom	Custom	Main Refinery
747	Reactor Effluent Heater H-124-01	99.6 MMBtu/hr Heater	Tulsa Heaters, Inc.	Custom	Main Refinery
748	Stripper Reboiler Heater H-124-02	44.2 MMBtu/hr Heater	Tulsa Heaters, Inc.	Custom	Main Refinery

Table B-6
Summary of Existing/Proposed TVOP No. 23-00003 RACT-Specific Conditions for 25 Pa. Code §129.114(i) Determinations
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	RACT-Specific Permit Condition(s)					
		Emissions/Fuel /Throughput Restriction(s)	Testing Requirement	Monitoring Requirement	Recordkeeping Requirement	Reporting Requirement	Work Practice Standards
101	FCC Unit	VOC: 8.1 tpy as a 12-month rolling sum. [Section D, Source ID 101 Condition #001]	N/A	N/A	N/A	N/A	Operate and maintain the source and air-cleaning devices in accordance with manufacturers' specifications as well as good air pollution control practices. [Section D, Source ID 101, Condition #024]
104	Marine Vessel Ballasting	VOC: 9.2 tons per 12-month rolling sum. [Section D, Source ID 104, Condition #001]	N/A	N/A	The permittee shall record each receipt of crude or gasoline at the facility. [Section D, Source ID 104, Condition #003]	N/A	N/A
105	Marine Vessel Loading	Reduce the VOCs by at least 98% by weight. [Section D, Source ID 105, Condition #003]	N/A	The permittee shall monitor and record the amount of gasoline loaded on a monthly basis. [Section D, Source ID 105, Condition #004]	The permittee shall keep record the amount of gasoline loaded on a monthly basis and calculate the VOC emission on a monthly basis and 12-month rolling sum. [Section D, Source ID 105, Condition #005]	The permittee shall notify the Department, within 10 days, the throughput and/or emission limit exceedance specified in Emission Restrictions of this section. [Section D, Source ID 105, Condition #006]	The captured VOC vapors shall be routed to the refinery fuel gas system. [Section D, Source ID 105, Condition #007]
111	Cooling Towers	(a) As per 40 C.F.R. §63.640(h)(6), heat exchange systems shall be in compliance with the existing source standards in 40 C.F.R. §63.654 no later than October 29, 2012. [Section D, Source ID 700, Condition #007]	N/A	The permittee must perform monitoring to identif leaks of total strippable volatile organic compounds (VOC) from each heat exchange system according to the procedures in paragraphs (1) through (6).	To delay a repair, the permittee must record the information in paragraphs (1)-(4) [Section D, Source ID 700, Condition #002] The permittee shall comply with the recordkeeping requirements of Condition #003 and retain these records for 5 years. [Section D, Source ID 700, Condition #003]	N/A	N/A
118	Railcar Loading LPG & Butane	VOC: 3.94 tons in any 12 consecutive month period. [Section D, Source ID 118 Condition #001]	N/A	N/A	Keep record of total rail cars that vent to atmosphere and calculate emissions from the rail car loading each month. [Section D, Source ID 118, Condition #002]	N/A	N/A
735	Kerosene/HCN HTU Heater	NO_X emissions shall not exceed 14.32 tons per year calculated as a 12-month rolling sum. [Section D, Source ID 735 Condition #001]	N/A	N/A	The permittee shall record each adjustment conducted in the tune-up for this source in a permanently bound log book, or other Department approved method. [Section D, Source ID 735, Condition #011]	N/A	A tune-up shall be performed on the unit annually if equipped with oxygen trim system. [Section D, Source ID 735 Condition #015, #017, 018] The permittee shall operate and maintain this unit in accordance with manufacturer's specifications and good operating practices for the control of VOC emissions from this unit. [Section D, Source ID 735 Condition #016]
736	Diesel HTU Heater	NO_X: 24.36 tons per year calculated as a 12-month rolling sum. VOC: 3.4 tons per year as a 12-month rolling sum. [Section D, Source ID 736, Condition #002]	N/A	N/A	The permittee shall record each adjustment conducted in the tune-up for this source in a permanently bound log book, or other Department approved method. [Section D, Source ID 736, Condition #010]	N/A	A tune-up shall be performed on the unit annually if equipped with oxygen trim system. [Section D, Source ID 736, Condition #013, #015, #016] The permittee shall operate and maintain this unit in accordance with manufacturer's specifications and good operating practices for the control of VOC emissions from this unit. [Section D, Source ID 736, Condition #014]

APPENDIX C -
RACT III PADEP WRITTEN NOTIFICATION TEMPLATE FORM

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

CHAPTER 129. STANDARDS FOR SOURCES ADDITIONAL RACT REQUIREMENTS FOR MAJOR SOURCES OF NOx AND VOCs FOR THE 2015 OZONE NAAQS

Written notification, 25 Pa. Code §§129.111 and 129.115(a)

25 Pa. Code Sections 129.111 and 129.115(a) require that the owner and operator of an air contamination source subject to the final-form RACT III regulations submit a notification describing how you intend to comply with the final-form RACT III requirements, and other information spelled out in subsection 129.115(a). The owner or operator may use this template to notify DEP. Notification must be submitted in writing or electronically to the appropriate Regional Manager located at the appropriate DEP regional office. In addition to the notification required by §§ 129.111 and 129.115(a), you also need to submit an applicable analysis or RACT determination as per § 129.114(a) or (i).

Is the facility major for NOx?	**Yes ☒ No ☐**
Is the facility major for VOC?	**Yes ☒ No ☐**

FACILITY INFORMATION						
Facility Name	***Monroe Energy LLC/ Trainer***					
Permit Number	***23-00003*** **PF ID if known** ***45-5201122-1***					
Address Line1	***4101 Post Rd***					
Address Line2						
City	***Trainer***	**State**	***PA***	**Zip**	***19061-5052***	
Municipality	***Trainer Borough***		**County**	***Delaware***		
OWNER INFORMATION						
Owner	***Monroe Energy LLC (Responsible Official: Mark Shuck)***					
Address Line1	***4101 Post Rd***					
Address Line2						
City	***Trainer***	**State**	***PA***	**Zip**	***19061-5052***	
Email	***Mark.shuck@monroe-energy.com***		**Phone**	***(610) 364-8000***		
CONTACT INFORMATION						
Permit Contact Name	***Elizabeth Clapp, P.E.***					
Permit Contact Title	***Environmental Leader***					
Address Line	***4101 Post Rd***					
City	***Trainer***	**State**	***PA***	**Zip**	***19061-5052***	
Email	***Elizabeth.Clapp@monroe-energy.com***			**Phone**	***(610) 364-8395***	

Table C-1
Source Information
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Make	Model	Physical location of a source (i.e, building#, plant#, etc.)	Was this source subject to RACT II?
034	Boiler 9	B&W	FM 160-124	Boiler House	Yes
035	Boiler 10	B&W	FM 160-124	Boiler House	Yes
053	Boiler 14	Rentech	Serial No. 2001-29	Boiler House	No
090	Existing Emergency Compression Ignition Engines <500 HP	Two Cummins and Two Caterpillar	Cummins: NT-855-F1 (255 HP) and HT-855-GS2 (270 HP) Caterpillar: 3406C (420 HP) and 3406B DIT (420 HP)	Main Refinery	Yes
091	Existing Emergency Compression Ignition Engines (IC <30 Liter)	Caterpillar	C-15	Main Refinery	Yes
092	Yanmar CI RICE (LP Basement Godwin Pump)	Custom	Custom	Main Refinery	Yes
101	FCC Unit	Custom	Custom	Main Refinery	Yes
102	Claus Sulfur Recovery Plant	Custom	Custom	Main Refinery	Yes
103	Main Flare	Custom	Custom	Main Refinery	Yes
104	Marine Vessel Ballasting	Custom	Custom	Main Refinery	Yes
105	Marine Vessel Loading	Custom	Custom	Main Refinery	Yes
111	Cooling Towers	Custom	Custom	Main Refinery	Yes
118	Railcar Loading LPG & Butane	Custom	Custom	Main Refinery	Yes
122	Back-up Flare	Custom	Custom	Main Refinery	Yes
130	Peabody Heater	Custom	Custom	Main Refinery	Yes
131	AWWTP Emergency Generator	Caterpillar	GENSET 3508	Main Refinery	Yes
702	ULSG Cooling Tower	Cooling Tower Depot	Custom	Main Refinery	No
733	FCCU Feed Heater	Onquest	Custom	Main Refinery	Yes

Table C-1
Source Information
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Make	Model	Physical location of a source (i.e, building#, plant#, etc.)	Was this source subject to RACT II?
735	Kerosene/HCN HTU Heater	Petrochem	Custom	Main Refinery	Yes
736	Diesel HTU Heater	Petrochem	Custom	Main Refinery	Yes
737	Naphtha HDS Heater	Foster Wheeler	Custom	Main Refinery	Yes
738	Platformer Feed Heater	Custom	Custom	Main Refinery	Yes
739	Isocracker Splitter Reboiler	Custom	Custom	Main Refinery	Yes
740	D2/VGO Hydrotreater Feed Heater	Custom	Custom	Main Refinery	Yes
741	VCD 541 VAC Heater	Custom	Custom	Main Refinery	Yes
742	VCD 542 VAC Heater	Custom	Custom	Main Refinery	Yes
743	ACD 542 VAC Heater	Custom	Custom	Main Refinery	Yes
744	ACD 543 Crude Heater	Petrochem	Custom	Main Refinery	Yes
745	ACD 544 Crude Heater	Petrochem	Custom	Main Refinery	Yes
746	VCD 544 VAC Heater	Petrochem	Custom	Main Refinery	Yes
C01	CO Boiler	Custom	Custom	Main Refinery	Yes
C102	SRU Incinerator	Custom	Custom	Main Refinery	Yes
747	Reactor Effluent Heater H-124-01	Tulsa Heaters, Inc.	Custom	Main Refinery	No
748	Stripper Reboiler Heater H-124-02	Tulsa Heaters, Inc.	Custom	Main Refinery	No
106	Process Drains & H_2O Sep.	Custom	Custom	Main Refinery	No
112	Purging & Sampling, etc.	Custom	Custom	Main Refinery	No
113	LPG Recovery Unit	Custom	Custom	Main Refinery	No
114	RACT Fugitive Equipment	Custom	Custom	Main Refinery	No
115	NSPS Fugitive Equipment	Custom	Custom	Main Refinery	No
123	#66 Ext. Float 43 Mbbls	Custom	Custom	Tank Farm	No
124	#67 Ext. Float 43 Mbbls	Custom	Custom	Tank Farm	No
125	#68 Ext. Float 43 Mbbls	Custom	Custom	Tank Farm	No
126	#95 Ext. Float 59 Mbbls	Custom	Custom	Tank Farm	No

Table C-1
Source Information
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Make	Model	Physical location of a source (i.e, building#, plant#, etc.)	Was this source subject to RACT II?
127	#96 Ext. Float 59 Mbbls	Custom	Custom	Tank Farm	No
128	MACT Fugitives	Custom	Custom	Main Refinery	No
133	Benzene Waste Operations	Custom	Custom	Main Refinery	No
134	#132 Int. Float 15 Mbbls	Custom	Custom	Tank Farm	No
136	#151 Ext. Float 53 Mbbls	Custom	Custom	Tank Farm	No
137	#152 Int. Float 61 Mbbl	Custom	Custom	Tank Farm	No
138	#153 Ext. Float 53 Mbbls	Custom	Custom	Tank Farm	No
139	#154A Int. Float 105 Mbbls	Custom	Custom	Tank Farm	No
140	#155 Int. Float 63 Mbbls	Custom	Custom	Tank Farm	No
141	#156 Ext. Float 53 Mbbls	Custom	Custom	Tank Farm	No
142	#157 Ext. Float 77 Mbbls	Custom	Custom	Tank Farm	No
143	#159 Ext. Float 79 Mbbls	Custom	Custom	Tank Farm	No
144	#161 Ext. Float 86 Mbbls	Custom	Custom	Tank Farm	No
145	#162 Ext. Float 82 Mbbls	Custom	Custom	Tank Farm	No
146	#163 Ext. Float 82 Mbbls	Custom	Custom	Tank Farm	No
147	#164 Ext. Float 83 Mbbls	Custom	Custom	Tank Farm	No
148	#165 Ext. Float 82 Mbbls	Custom	Custom	Tank Farm	No
149	#166 Ext. Float 83 Mbbls	Custom	Custom	Tank Farm	No
150	#168 Int. Float 79 Mbbls.	Custom	Custom	Tank Farm	No
151	#169 Ext. Float 78 Mbbls	Custom	Custom	Tank Farm	No
152	#170 Ext. Float 71 Mbbls	Custom	Custom	Tank Farm	No
153	#171 Int. Float 83 Mbbls	Custom	Custom	Tank Farm	No
154	#172 Ext. Float 81 Mbbls	Custom	Custom	Tank Farm	No
155	#174 Ext. Float 154 Mbbls	Custom	Custom	Tank Farm	No
156	#175 Ext. Float 151 Mbbls	Custom	Custom	Tank Farm	No
157	#178 Ext. Float 80 Mbbls	Custom	Custom	Tank Farm	No
160	#181 Ext. Float 129 Mbbls	Custom	Custom	Tank Farm	No
161	#182 Ext. Float 129 Mbbls	Custom	Custom	Tank Farm	No
162	#184 Ext. Float 26 Mbbls	Custom	Custom	Tank Farm	No
163	#185 Ext. Float 150 Mbbls	Custom	Custom	Tank Farm	No

Table C-1
Source Information
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	Make	Model	Physical location of a source (i.e, building#, plant#, etc.)	Was this source subject to RACT II?
164	#186 Ext. Float 151 Mbbls	Custom	Custom	Tank Farm	No
165	#93 Ext. Float 244 Mbbl	Custom	Custom	Tank Farm	No
166	#94 Ext. Float 243 Mbbl	Custom	Custom	Tank Farm	No
180	#54 Cone Roof Tk 54 Mbbls	Custom	Custom	Tank Farm	No
190	#134 Int. Float 15 Mbbls	Custom	Custom	Tank Farm	No
194	#160 Int. Float 85 Mbbls	Custom	Custom	Tank Farm	No
215	NSPS New Fugitive Equipment	Custom	Custom	Main Refinery	No
300	Miscellaneous MACT Group 2 Tanks	Custom	Custom	Tank Farm	No
501	Spheroid 501 (1.26 MMgal)	Custom	Custom	Tank Farm	No
502	Spheroid 502 (1.26 MMgal)	Custom	Custom	Tank Farm	No
513	Spheroid 513 (1.26 MMgal)	Custom	Custom	Tank Farm	No
730	Reformer Unit Fugitives	Custom	Custom	Main Refinery	No

Table C-2
Method of RACT III Compliance, NO_X
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	NOx Permit Limitation/ PTE	Exempt from RACT III (yes or no)	How do you intend to comply? (PRES, CbC, FAC or SYS)	Specific citation of rule if presumptive option is chosen
034	Boiler 9	0.1 lb/MMBtu	No	PRES	§129.112(g)(1)(i) and (iv)
035	Boiler 10	0.1 lb/MMBtu	No	PRES	§129.112(g)(1)(i) and (iv)
053	Boiler 14	0.0077 lb/MMBtu	No	PRES	§129.112(g)(1)(i) and (iv)
090	Existing Emergency Compression Ignition Engines <500 HP	N/A	No	PRES	§129.112(c)(6)
091	Existing Emergency Compression Ignition Engines (IC <30 Liter)	N/A	No	PRES	§129.112(c)(6) and (10)
092	Yanmar CI RICE (LP Basement Godwin Pump)	N/A	No	PRES	§129.112(c)(6) and (7)
101	FCC Unit	654.5 tpy	No	CbC	§129.114(b)
102	Claus Sulfur Recovery Plant	N/A	No	PRES	§129.112(c)(4)
103	Main Flare	69 tpy	No	PRES	§129.112(c)(8)
122	Back-up Flare	N/A	No	PRES	§129.112(c)(8)
130	Peabody Heater	7.6 tpy	No	CbC	§129.114(b)
131	AWWTP Emergency Generator Engine	N/A	No	PRES	§129.112(c)(10)
733	FCCU Feed Heater	0.045 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
735	Kerosene/HCN HTU Heater	14.32 tpy	No	CbC	§129.114(b) and §129.114(i)
736	Diesel HTU Heater	24.36 tpy	No	CbC	§129.114(b) and §129.114(i)
737	Naphtha HDS Heater	0.2 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
738	Platformer Feed Heater	0.12 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
739	Isocracker Splitter Reboiler	0.2 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
740	D2/VGO Hydrotreater Feed Heater	0.45 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
741	VCD 541 VAC Heater	0.25 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
742	VCD 542 VAC Heater	0.25 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
743	ACD 542 VAC Heater	0.25 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
744	ACD 543 Crude Heater	0.2 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
745	ACD 544 Crude Heater	0.2 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
746	VCD 544 VAC Heater	0.06 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
C01	CO Boiler	N/A	No	PRES	§129.112(c)(8)
C102	SRU Incinerator	N/A	No	PRES	§129.112(c)(8)
747	Reactor Effluent Heater H-124-01	0.035 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)
748	Stripper Reboiler Heater H-124-02	0.035 lb/MMBtu	No	PRES	§129.112(g)(1)(iv)

Table C-3
Method of RACT III Compliance, VOC
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	VOC PTE TPY	Exempt from RACT III (yes or no)	How do you intend to comply?	Specify citation of rule or subject to 25 Pa Code RACT regulation, (list the applicable sections)
034	Boiler 9	2 tpy	No	PRES	§129.112(d)
035	Boiler 10	2 tpy	No	PRES	§129.112(d)
053	Boiler 14	1.98 tpy	No	PRES	§129.112(d)
090	Existing Emergency Compression Ignition Engines <500 HP	N/A	No	PRES	§129.112(c)(6)
091	Existing Emergency Compression Ignition Engines (IC <30 Liter)	N/A	No	PRES	§129.112(c)(6) and (10)
092	Yanmar CI RICE (LP Basement Godwin Pump)	N/A	No	PRES	§129.112(c)(6) and (7)
101	FCC Unit	8.1 tpy	No	CbC	§129.114(c)
102	Claus Sulfur Recovery Plant	N/A	No	PRES	§129.112(c)(2)
103	Main Flare	N/A	No	PRES	§129.112(c)(8)
104	Marine Vessel Ballasting	9.2 tpy	No	CbC	§129.114(c) and §129.114(i)
105	Marine Vessel Loading	N/A	No	CbC	§129.114(c) and §129.114(i)
111	Cooling Towers	7.59 tpy	No	CbC	§129.114(c) and §129.114(i)
118	Railcar Loading LPG & Butane	3.94 tpy	No	CbC	§129.114(c) and §129.114(i)
122	Back-up Flare	N/A	No	PRES	§129.112(c)(8)
130	Peabody Heater	N/A	No	PRES	§129.112(d)
131	AWWTP Emergency Generator Engine	N/A	No	PRES	§129.112(c)(10)
702	ULSG Cooling Tower	6.02 tpy	No	CbC	§129.114(c) and §129.114(i)
733	FCCU Feed Heater	2.2 tpy	No	PRES	§129.112(d)
735	Kerosene/HCN HTU Heater	N/A	No	PRES	§129.112(d)
736	Diesel HTU Heater	3.4 tpy	No	PRES	§129.112(d)
737	Naphtha HDS Heater	N/A	No	PRES	§129.112(d)
738	Platformer Feed Heater	N/A	No	PRES	§129.112(d)
739	Isocracker Splitter Reboiler	N/A	No	PRES	§129.112(d)
740	D2/VGO Hydrotreater Feed Heater	N/A	No	PRES	§129.112(d)
741	VCD 541 VAC Heater	N/A	No	PRES	§129.112(d)
742	VCD 542 VAC Heater	N/A	No	PRES	§129.112(d)
743	ACD 542 VAC Heater	< 1 tpy	Yes	N/A	§129.111(c)
744	ACD 543 Crude Heater	N/A	No	PRES	§129.112(d)
745	ACD 544 Crude Heater	N/A	No	PRES	§129.112(d)
746	VCD 544 VAC Heater	5.5 tpy	No	PRES	§129.112(d)
C01	CO Boiler	N/A	No	PRES	§129.112(c)(8)
C102	SRU Incinerator	N/A	No	PRES	§129.112(c)(8)
747	Reactor Effluent Heater H-124-01	3.15 tpy	No	PRES	§129.112(d)
748	Stripper Reboiler Heater H-124-02	3.15 tpy	No	PRES	§129.112(d)
106	Process Drains & H_2O Sep.	N/A	Yes	N/A	§129.55
112	Purging & Sampling, etc.	N/A	Yes	N/A	§129.58
113	LPG Recovery Unit	4.6 tpy	Yes	N/A	§129.58
114	RACT Fugitive Equipment	N/A	Yes	N/A	§129.58
115	NSPS Fugitive Equipment	N/A	Yes	N/A	§129.58
123	#66 Ext. Float 43 Mbbls	N/A	Yes	N/A	§129.56
124	#67 Ext. Float 43 Mbbls	N/A	Yes	N/A	§129.56
125	#68 Ext. Float 43 Mbbls	N/A	Yes	N/A	§129.56
126	#95 Ext. Float 59 Mbbls	N/A	Yes	N/A	§129.56
127	#96 Ext. Float 59 Mbbls	N/A	Yes	N/A	§129.56

Table C-3
Method of RACT III Compliance, VOC
Monroe Energy, LLC - Trainer, PA

Source ID	Source Name	VOC PTE TPY	Exempt from RACT III (yes or no)	How do you intend to comply?	Specify citation of rule or subject to 25 Pa Code RACT regulation, (list the applicable sections)
128	MACT Fugitives	N/A	Yes	N/A	§129.58
133	Benzene Waste Operations	N/A	Yes	N/A	§129.55
134	#132 Int. Float 15 Mbbls	N/A	Yes	N/A	§129.56
136	#151 Ext. Float 53 Mbbls	N/A	Yes	N/A	§129.56
137	#152 Int. Float 61 Mbbl	N/A	Yes	N/A	§129.56
138	#153 Ext. Float 53 Mbbls	0.7 tpy	Yes	N/A	§129.56
139	#154A Int. Float 105 Mbbls	4 tpy	Yes	N/A	§129.56
140	#155 Int. Float 63 Mbbls	N/A	Yes	N/A	§129.56
141	#156 Ext. Float 53 Mbbls	N/A	Yes	N/A	§129.56
142	#157 Ext. Float 77 Mbbls	N/A	Yes	N/A	§129.56
143	#159 Ext. Float 79 Mbbls	N/A	Yes	N/A	§129.56
144	#161 Ext. Float 86 Mbbls	N/A	Yes	N/A	§129.56
145	#162 Ext. Float 82 Mbbls	N/A	Yes	N/A	§129.56
146	#163 Ext. Float 82 Mbbls	N/A	Yes	N/A	§129.56
147	#164 Ext. Float 83 Mbbls	N/A	Yes	N/A	§129.56
148	#165 Ext. Float 82 Mbbls	N/A	Yes	N/A	§129.56
149	#166 Ext. Float 83 Mbbls	N/A	Yes	N/A	§129.56
150	#168 Int. Float 79 Mbbls.	N/A	Yes	N/A	§129.56
151	#169 Ext. Float 78 Mbbls	N/A	Yes	N/A	§129.56
152	#170 Ext. Float 71 Mbbls	N/A	Yes	N/A	§129.56
153	#171 Int. Float 83 Mbbls	N/A	Yes	N/A	§129.56
154	#172 Ext. Float 81 Mbbls	N/A	Yes	N/A	§129.56
155	#174 Ext. Float 154 Mbbls	N/A	Yes	N/A	§129.56
156	#175 Ext. Float 151 Mbbls	N/A	Yes	N/A	§129.56
157	#178 Ext. Float 80 Mbbls	N/A	Yes	N/A	§129.56
160	#181 Ext. Float 129 Mbbls	N/A	Yes	N/A	§129.56
161	#182 Ext. Float 129 Mbbls	N/A	Yes	N/A	§129.56
162	#184 Ext. Float 26 Mbbls	N/A	Yes	N/A	§129.56
163	#185 Ext. Float 150 Mbbls	N/A	Yes	N/A	§129.56
164	#186 Ext. Float 151 Mbbls	N/A	Yes	N/A	§129.56
165	#93 Ext. Float 244 Mbbl	6.5 tpy	Yes	N/A	§129.56
166	#94 Ext. Float 243 Mbbl	6.5 tpy	Yes	N/A	§129.56
180	#54 Cone Roof Tk 54 Mbbls	N/A	Yes	N/A	§129.56
190	#134 Int. Float 15 Mbbls	N/A	Yes	N/A	§129.56
194	#160 Int. Float 85 Mbbls	0.3 tpy	Yes	N/A	§129.56
215	NSPS New Fugitive Equipment	N/A	Yes	N/A	§129.58
300	Miscellaneous MACT Group 2 Tanks	N/A	Yes	N/A	§129.56
501	Spheroid 501 (1.26 MMgal)	N/A	Yes	N/A	§129.56
502	Spheroid 502 (1.26 MMgal)	N/A	Yes	N/A	§129.56
513	Spheroid 513 (1.26 MMgal)	N/A	Yes	N/A	§129.56
730	Reformer Unit Fugitives	N/A	Yes	N/A	§129.58