



August 15, 2018

Mr. Thomas Gunter
Division of Air Quality
Utah Department of Environmental Quality
PO Box 144820
Salt Lake City, UT 84114-4820

RE: Big West Oil, LLC Comments to proposed Amendments to Utah State Implementation Plan, Section IX (Control Measures for Area and Point Sources), Part H (Emission Limits and Operating Practices); R307-110-117

Dear Mr. Gunter:

Big West Oil, LLC (“BWO”) appreciates the opportunity to provide these comments regarding the Utah Department of Environmental Quality (“DEQ”), Division of Air Quality (“UDAQ”) proposed amendments to the Utah State Implementation Plan (“Utah SIP”), Section IX, Part H regarding particulate matter emissions in the Logan, Provo and Salt Lake Nonattainment Areas (the “PM SIP” or the “Rule”). BWO looks forward to working with UDAQ staff to facilitate the necessary changes to the proposed PM SIP to address these important issues.

BWO respectfully submits the following comments regarding the proposed amendments to the State Implementation plan (SIP) Subsection IX, Part H, Sections 1, 2, 11, and 12. As owner and operator of the North Salt Lake Refinery, BWO is subject to the emission limitations and other requirements proposed in this rulemaking. In addition to the comments in this letter, BWO endorses and incorporates by this reference the comments submitted by the Utah Petroleum Association (UPA) to the same rulemaking action.¹

Included in UPA’s comments is a major stationary source precursor demonstration showing that major stationary sources’ emissions of VOC, NO_x, SO_x, and NH₃ are “insignificant” contributors to PM_{2.5} concentrations in the Salt Lake City Nonattainment Area (SLC NAA). Given the conclusive results of the precursor demonstration – coupled with the legal requirement that UDAQ and the Utah Air Quality Board must determine that the controls imposed are necessary – UDAQ should forgo all proposed conditions in Part H that impose new control requirements on BWO’s VOC, NO_x, SO_x, and NH₃ emissions. Furthermore, and consistent with the PM_{2.5} Implementation Rule, UDAQ Best Available Control Technology (BACT) review should be confined to a review of potential controls on direct PM_{2.5} emissions.²

¹ BWO is a member company of UPA

² See 40 CFR § 51.1010(a)(2)(iii) (“The state is not required to identify and evaluate potential control measures to reduce emissions of a particular PM_{2.5} precursor from any existing major stationary sources if the state has submitted a major stationary source precursor demonstration approved by the EPA.”).

Comment 1

The PM SIP inappropriately proposes to apply certain requirements of U.S. EPA's New Source Performance Standards for Petroleum Refineries, codified in 40 C.F.R., Part 60, Subpart Ja ("NSPS Ja"). Specifically, Subsections IX.H.1.g.i.A.II and IX.H.11.g.i.A.II require demonstration of compliance with the Fluid Catalytic Cracking Units (FCCU) SO₂ limit in accordance with 40 C.F.R. section 60.105a(g). In addition, Subsections IX.H.1.g.i.B.III and IX.H.11.g.i.B.III require that FCCU install and operate continuous parameter monitoring system (CPMS) in accordance with 40 C.F.R. section 60.105a(b)(1).

BWO is subject to NSPS Subpart J ("NSPS J"), not NSPS Ja. Imposing NSPS Ja in this regard is inappropriate as these provisions require implementation of costly monitoring equipment without any corresponding reduction in particulate matter emission. Though the emission limits for a FCCU under NSPS J and NSPS Ja are the same for particulate matter, O₂ and SO₂, NSPS Ja requires extensive monitoring equipment while NSPS J emission are determined in accordance with prescribed stack tests, a method that Subsection IX.H.2.d.1.A of the rule endorses.

With this, BWO suggests these provisions should be revised as follows:

Subsection IX.H.1.g.i.A.II

Compliance with this limit shall be determined by using a CEM in accordance with IX.H.1.f following 40 C.F.R. §60.105a(g).

Subsection IX.H.11.g.i.A.II

Compliance with this limit shall be determined by using a CEM in accordance with IX.H.1.f following 40 C.F.R. §60.105a(g).

Subsection IX.H.1.g.i.B.III

~~[By n]No later than January 1, 2019, each owner or operator of an FCCU shall install, operate and maintain a continuous parameter monitor system (CPMS) to measure and record operating parameters from the FCCU for determination of source-wide [PM10]particulate emissions as per the requirements of 40 CFR 60.105a(b)(1).~~

Subsection IX.H.11.g.i.B.III

~~[By n]No later than January 1, 2019, each owner or operator of an FCCU shall install, operate and maintain a continuous parameter monitor system (CPMS) to measure and record operating parameters for determination of source-wide PM2.5 emissions as per the requirements of 40 CFR 60.105a(b)(1).~~

Comment 2

Subsections IX.1.g.i.B.I and IX.H.11.g.i.B.I provide for a particulate matter emission limit for FCCUs of 1.0 pounds of PM per 1,000 pounds of coke burned on a "3-hour average basis". This

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language suggests that compliance with the limit is required in a continuous 3-hour average basis. Under NSPS J or Ja it is required that compliance with the 1.0 pounds of PM per 1,000 pounds of coke burned limit be determined in accordance with the stack test protocol provided in NSPS J or NSPS Ja. These stack tests protocols under NSPS J or NSPS Ja set forth the specific parameters for both the number and length of each test that must be satisfied in order to conduct a valid test which will not allow PM emissions to be determined in a continuous or rolling 3-hour average.

Duration limits and calculation methods under Subsection IX.H.1.g.i.B.II and IX. H.11.g.i.B.I, contrary to requirements under NSPS J and NSPS Ja, which are expressly required by Subsections IX.H.1.g.B.II and IX.H.11.g.i.B.II, would make compliance with both provisions of the PM SIP impossible. With no technical basis as to why UDAQ feels that a 3-hour average basis is either necessary or appropriate, BWO feels these provisions should be revised as follows:

Subsection IX.H.1.g.i.B.I

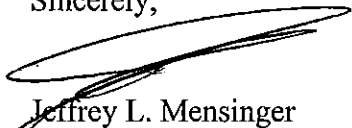
[By no later than January 1, 2018, e] Each owner or operator of an FCCU shall comply with an emission limit of 1.0 pounds PM per 1000 pounds coke ~~burn-off~~ ~~burned on a 3-hour average basis~~.

Subsection IX.H.11.g.i.B.I

[By no later than January 1, 2018, e] Each owner or operator of an FCCU shall comply with an emission limit of 1.0 pounds PM per 1000 pounds coke ~~burn-off~~ ~~burned on a 3-hour average basis~~.

Again, BWO appreciates DAQ's willingness to meet with stakeholders throughout this process and appreciate the opportunity to provide comments on this matter. BWO looks forward to working with UDAQ staff to address these concerns and to make the necessary changes to the proposed Rule. If there are any questions, please feel free to contact me at (801)296-7784.

Sincerely,



Jeffrey L. Mensinger
Sr. Environmental Engineer

cc: Mike Swanson
Orson Thornton