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**VIA ELECTRIC SUBMISSION TO:
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Mr. Bryce Bird, Director
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Subject: Chevron Salt Lake Refinery Comments to October 2018 Revised Proposed Amendments to Utah State Implementation Plan, Section IX, Part H

Dear Messrs. Bird and Gunter:

The Chevron Products Company Salt Lake Refinery (the “Salt Lake Refinery”) appreciates the opportunity to provide these comments regarding the Utah Department of Environmental Quality, Division of Air Quality (“DAQ”) October 2018 revised proposed amendments to the Utah State Implementation Plan, Section IX (Control Measures for Area and Point Sources), Part H (Emission Limits and Operating Practices) regarding particulate matter emissions (the “PM SIP” or the “Rule”).¹

On September 24, 2018, DAQ provided its response to comments on the June 6, 2018 version of the proposed Rule.² We note, however, that, as described below, certain changes proposed in DAQ’s September 2018 Response to Comments do not appear in the October 2018 revised draft of the proposed Rule.³

¹ Available at: <https://documents.deq.utah.gov/air-quality/pm25-serious-sip/DAQ-2018-014255.pdf>

² See September 24, 2018 Memo from Bill Reiss, Environmental Engineer, to Bryce C. Bird, Executive Secretary, titled “PROPOSE FOR PUBLIC COMMENT: Amend SIP Subsection IX, Part H: Emission Limits and Operating Practices. Specifically Proposed for Amendment are Requirements in Subparts H. 1, 2, 11 and 12 (“September 2018 Response to Comments”).

³ Response to H-19 in DAQ’s September 2018 Response to Comments appears to have addressed the Salt Lake Refinery’s August 15, 2018 comments to the Technical Support Document for Section IX, Part H.12 of the PM SIP evaluating the Salt Lake Refinery as it relates to the Salt Lake City PM_{2.5} Nonattainment Area (the “Salt Lake Refinery PM_{2.5} SIP Evaluation Report”). Available at: <https://documents.deq.utah.gov/air-quality/pm25-serious-sip/DAQ-2018-007373.pdf> However, DAQ

Comment No. 1: Method for Calculating Compliance with Flare Flow Requirements Should Be Consistent for PM_{2.5} and PM₁₀

As DAQ is aware, the PM SIP requirements regarding the PM₁₀ Nonattainment/Maintenance Area and the PM_{2.5} Nonattainment/Maintenance Area largely mirror one another.⁴ While these provisions are nearly identical, there are instances in which these provisions are inconsistent or incorrect, and thus, should be appropriately corrected. Specifically, Subsection IX.H.1.g.v., which provides the general requirements for hydrocarbon flares located in the PM₁₀ Nonattainment/Maintenance Area, references hydrocarbon flares at petroleum refineries located in or affecting a PM_{2.5} non-attainment area in Utah. The reference to “PM_{2.5}” instead of “PM₁₀” in Subsection IX.H.1.g.v appears to be in error. While DAQ agreed with our August 15, 2018 comment in this regard and proposed language in its September 2018 Response to Comments to correct this issue,⁵ such language does not appear in the revised proposed Rule. Thus, we request that DAQ incorporate the language it proposed in its September 2018 Response to Comments, Response to H-17 to correct Subsection IX.H.1.g.v.

Comment No. 2: Application of U.S. EPA NSPS Ja Provisions to the Salt Lake Refinery is Inappropriate

As detailed in our prior comments, 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).⁶ As detailed in our August 15, 2018 comments, imposing NSPS Ja in this regard is inappropriate as these provisions require implementation of costly monitoring equipment without any corresponding reduction in particulate matter emissions.

has not provided a revised Salt Lake Refinery PM_{2.5} SIP Evaluation Report for public comment, but instead, states that its Response H-19 “shall be used in conjunction with the Salt Lake Refinery PM_{2.5} SIP Evaluation Report.” The Salt Lake Refinery, therefore, justifiably relies on DAQ’s Response to H-19 to conclude that its comment to the Salt Lake Refinery PM_{2.5} SIP Evaluation Report have been fully addressed.

⁴ See, e.g., Subsections H.1 (General Requirements: Control Measures and Point Sources, Emission Limits and Operating Practices, PM₁₀ Requirements) and H.11 (General Requirements: Control Measures and Point Sources, Emission Limits and Operating Practices, PM_{2.5} Requirements).

⁵ See September 2018 Response to Comments, Response to H-14, H-15, and H-17.

⁶ We note that Subsections IX.H.1.g.i.B.III and IX.H.11.g.i.B.III require CPMS to measure operating parameters for determining source-wide particulate matter *emissions*. This appears to be in error, as CPMS are required under NSPS Ja to measure and record *operating parameters* of control devices such as power input, pressure drop, liquid feed rate, exhaust gas flow rate, coke burn-off rate, as well as FCCU hours of operation—not emissions. 40 C.F.R. § 105a(b)(1). This provision also appears to conflict with Subsection IX.H.2.d.1.A. that provides for the use of *stack tests* (not CPMS operating parameters) for determining emission factors for source-wide particulate matter emissions.

While DAQ agreed with our August 15, 2018 comment in this regard and proposed language in its September 2018 Response to Comments to correct this issue,⁷ such language does not appear in the revised proposed Rule. Thus, we request that DAQ incorporate the language it proposed in its September 2018 Response to Comments, Response to H-14, to modify Subsections IX.H.1.g.i.B.III and IX.H.11.g.i.B.III to fully address this issue.

Comment No. 3: Requiring Flare No. 3 at the Salt Lake Refinery to Install a Flare Gas Recovery System is Incorrect and Contrary to the Rule

The PM SIP incorrectly proposes to require the Salt Lake Refinery to install a flare gas recovery system at Flare No.3. Flare No. 3 is directly tied to the Salt Lake Refinery’s HF Alkylation Unit, Isomerization Unit, and Reformer Unit. Importantly, under the Rule, “Flare gas recovery is *not* required for dedicated . . . HF flare and header systems”.⁸ Thus, because Flare No. 3 is directly tied to the Refinery’s HF Alkylation Unit, a flare gas recovery system is not required for this emission unit.

Based on the foregoing, these provisions should be revised as follows:

Subsection IX.H.2.d.vii.

~~ix~~ vii. No later than January 1, 2019, the owner/operator shall install the following to control emissions from the listed equipment:

Emission Unit	Control Equipment
Flares: Flare 1, 2, 3	Flare gas recovery system

Subsection IX.H.12.d.vii.

vii. No later than January 1, 2019, the owner/operator shall install the following to control emissions from the listed equipment:

Emission Unit	Control Equipment
Flares: Flare 1, 2, 3	Flare gas recovery system

We appreciate DAQ’s willingness to meet with stakeholders throughout this process and appreciate the opportunity to provide these comments. We look forward to working with DAQ staff to address these concerns and to make the necessary changes to the revised PM SIP.

Sincerely,



Mitra Kashanchi

⁷ See September 2018 Response to Comments, Response to H-18.

⁸ Subsections IX.H.1.g.v.B and IX.H.11.g.v.B (emphasis added).