Section III

NSPS Subpart J - Fuel Gas Combustion Devices Process Vents Alternative Monitoring

NSPS Subpart J requires that H₂S in fuel gas be limited to 163 ppm if the fuel gas is combusted in an affected fuel gas combustion device. To demonstrate compliance, CEMS are required to monitor the H₂S concentration of fuel gas. The primary fuel gas streams at the refinery include refinery fuel gas (RFG) and flexigas (FXG). Each of these fuel gas streams have an H₂S CEMS as required by NSPS Subpart J. The definition of fuel gas under NSPS Subpart J also includes other "fuel gas" streams, such as process vent gases, if they are routed to an affected fuel gas combustion device. For these vent gases, the refinery does not use CEMS and instead utilizes alternative monitoring that is allowed under 60.13(i). In accordance with 60.13(i), the alternative monitoring plans have been approved by U.S. Environmental Protection Agency, Region IX. In the Title V Permit, the following changes are requested to clarify the appropriate monitoring requirements.

1. In Table VII-AU, modify the following line item as follows:

S	O ₂	NSPS	Y	Fuel gas H ₂ S limited to	NSPS	С	H_2S
		Subpart J		0.10 gr/dscf (163 ppm) for	Subpart J		analyzer <u>for</u>
		60.104(a)(1)		refinery fuel gas (RFG)	60.105(a)(4)		refinery fuel
				and/or flexigas (FXG)	and		gas (RFG)
					60.105(e)(3)		and/or
							flexigas
							<u>(FXG)</u>

2. Modify Table VII-CDa as follows:

Table VII – CDa
Applicable Limits and Compliance Monitoring Requirements
S4141 – DC F-14011 HGHT FEED

Type of Limit	Citation of Limit	FE Y/N See	Future Effective Date e Table VII	Limit – AU & CD for additional 1	Monitoring Requirement Citation requirements.	Monitoring Frequency (P/C/N)	Monitoring Type
\$0 2	NSPS Subpart J 60.104(a)(1)	¥		Fuel gas H₂S limited to 0.10 gr/dscf (163 ppm)	NSPS Subpart J 60.105(a)(4) and 60.105(e)(3) for refinery fuel gas and flexigas	E	H ₂ S analyzer

Table VII – CDa Applicable Limits and Compliance Monitoring Requirements S4141 – DC F-14011 HGHT FEED

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO_2	NSPS	Y		Fuel gas H2S limited to	40 CFR	Р	Monitoring,
	Subpart J			0.10 gr/dscf (163 ppm) for	60.13(i) for		records, and
	60.104			CR-2 vent gas	CR-2 vent		reporting <u>for</u>
	(a)(1)				gas		CR-2 vent
							gas

3. In Table VII-AX, modify the following line item as follows:

Γ	SO_2	NSPS	Y	Fuel gas H ₂ S limited to	NSPS	С	H_2S
		Subpart J		0.10 gr/dscf (163 ppm) for	Subpart J		analyzer <u>for</u>
		60.104(a)(1)		refinery fuel gas (RFG)	60.105(a)(4)		refinery fuel
				and/or flexigas (FXG)	and		gas (RFG)
					60.105(e)(3)		and/or
							flexigas
							<u>(FXG)</u>

4. In Table VII-BY, modify the following two line item as follows:

SO 2	NSPS	¥	Fuel gas H ₂ S limited to	NSPS	C	H_2S
	Subpart J		0.10 gr/dscf (163 ppm)	Subpart J		analyzer
	60.104(a)(1)			60.105(a)(4)		
				and		
				60.105(e)(3)		
				for refinery		
				fuel gas and		
				flexigas		
SO_2	NSPS	Y	Fuel gas H2S limited to	40 CFR	Р	Monitoring,
	Subpart J		0.10 gr/dscf (163 ppm) <u>fo</u>	60.13(i) for		records, and
	60.104		CR-2 vent gas	CR-2 vent		reporting for
	(a)(1)			gas		CR-2 vent
						gas

5. In Table VII-AQ, modify the following line item as follows:

SO_2	NSPS	Y	Fuel gas H ₂ S limited to	NSPS	С	H_2S
	Subpart J		0.10 gr/dscf (163 ppm) for	Subpart J		analyzer <u>for</u>
	60.104(a)(1)		refinery fuel gas (RFG)	60.105(a)(4)		refinery fuel
			and/or flexigas (FXG)	and		gas (RFG)
				60.105(e)(3)		and/or
						flexigas
						<u>(FXG)</u>

6. Modify Table VII-AQa as follows:

Table VII – AQaApplicable Limits and Compliance Monitoring RequirementsS1480 – LUBS F-69 ASPHALT CIRCULATION, S1481 – OPCEN F-30 DSU,S1484 – LUBS F-34 LHT CHARGE, S1506 – CP F-61 CGP FEED

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO 2	NSPS Subpart J 60.104(a)(1)	¥		Fuel gas H2S limited to 0.1 gr/dscf (163 ppm)	NSPS Subpart J 60.105(a)(4) and 60.105(e)(3) for refinery fuel gas	G	H ₂ S analyzer
SO ₂	NSPS Subpart J 60.104(a)(1)	Y		Fuel gas H2S limited to 0.1 gr/dscf (163 ppm) <u>for</u> <u>vent gases from</u> <u>Sulfonation Unit SO₂ Adsorber and Lubricants</u> <u>Hydrotreater #1 Vacuum</u> <u>Flash Dryer</u>	40 CFR 60.13(i) for Sulfonation Unit SO2 Adsorber vent gas for S1480 and Lubricants Hydrotreater #1-Vacuum Flash Dryer vent gas for S1484	Р	Monitoring, records, and reporting for <u>vent gases</u> from <u>Sulfonation</u> <u>Unit SO₂ Adsorber and Lubricants <u>Hydrotreater</u> <u>#1 Vacuum</u> Flash Dryer</u>

7. In Table VII-CB, modify the following line item as follows:

SO ₂	NSPS	Y	Fuel gas H ₂ S limited to	NSPS	С	H ₂ S analyzer
	Subpart J		0.10 gr/dscf (163 ppm)	Subpart J		for refinery
	60.104(a)(1)		for refinery fuel gas	60.105(a)(4)		fuel gas
			(RFG) and/or flexigas	and		(RFG) and/or
			<u>(FXG)</u>	60.105(e)(3)		flexigas
						(FXG)

8. Modify Table VII-CC as follows:

Table VII – CC Applicable Limits and Compliance Monitoring Requirements S4171 – LUBS F-13000 LHT2 FEED

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO 2	NSPS	¥		Fuel gas H ₂ S limited to	NSPS	e	H ₂ S analyzer
	Subpart J			0.10 gr/dscf (163 ppm)	Subpart J		
	60.104(a)(1)				60.105(a)(4)		
					and		
					60.105(e)(3)		
					for flexigas		

Table VII – CCApplicable Limits and Compliance Monitoring RequirementsS4171 – LUBS F-13000 LHT2 FEED

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
SO ₂	NSPS	Y		Fuel gas H ₂ S limited to	40 CFR	Р	Monitoring,
	Subpart J			0.10 gr/dscf (163 ppm)	60.13(i) for		records, and
	60.104(a)(1)			for vent gas from	Lubricants		reporting for
				Lubricants Hydrotreater	Hydrotreater		vent gas from
				<u>#2 Vacuum Flash Dryer</u>	#2 Vacuum		Lubricants
					Flash Dryer		Hydrotreater
					vent gas		#2 Vacuum
							Flash Dryer