

Update on Refinery & Chemical MSS Issues

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Refinery MSS Applications

- ◆ **Due date January 5, 2007.**
- ◆ **Received 27 applications.**
- ◆ **Status of reviews.**
 - ◆ **1st Public Notice authorized**
 - ◆ **1st Deficiency letter out**
- ◆ **Permits must be issued by the end of 2007.**



What Are the Issues?

- ◆ **BACT**
- ◆ **Vacuum trucks**
- ◆ **Federal applicability**
- ◆ **Defining startup and shutdown**
- ◆ **Rule issues**
- ◆ **Level of detail for activities**
- ◆ **Partial permitting**



BACT

- ◆ **Proposed BACT for some activities consistent**
- ◆ **New activities or sources**
 - ◆ **Vacuum Trucks**
 - ◆ **Tank Roof Landings**
- ◆ **Consistency of requirements for new types of activities**



BACT (cont.)

- ◆ **Control vessel degas to 34,000 ppmv as methane if VP > 0.5 psia**
 - ◆ **may go lower for Watch List compounds**
- ◆ **No convenience landings for floating roof tanks**
- ◆ **Refloating tank roofs**
 - ◆ **Control emissions**
 - ◆ **Control refill rate**
- ◆ **Process units – 1 planned shutdown per year**
 - ◆ **Looking at smaller activities**
- ◆ **Control vacuum trucks**



Vacuum Trucks

- ◆ Emissions dependent on what is/has been vacuumed
- ◆ Emissions also affected by how vacuum is operated
- ◆ No good method to estimate emissions established
- ◆ Talking to vendors to improve knowledge



Federal Applicability

- ◆ **If unit operated before PSD/NA was effective, verify that no subsequent changes increased MSS emissions**
- ◆ **If unit operated after PSD/NA, must do analysis**
 - ◆ **May include MSS in baseline if reported in EI and adjusted for BACT**
 - ◆ **May do retro-review**
 - ◆ **May do case-by-case**



Defining Startup and Shutdown

- ◆ Existing permits have requirements for concentrations, etc. that may not be met during SU/SD although emissions are less than allowable limits.
- ◆ It may be acceptable BACT to exceed those requirements during SU/SD.
- ◆ Usable, generic definition to identify when condition limits do not apply.
- ◆ Case-by-case definitions require more work after numerous conditions.
- ◆ Emissions must be compliant with all permit conditions. Nothing is “inherently” permitted.



Rule Issues

- ◆ Will lose affirmative defense for TCEQ rules when permits are issued.
- ◆ Some rules do not clearly address MSS or exemptions for permitted MSS emissions.
- ◆ Currently identifying issues that will not be resolved by BACT approval.
- ◆ Discussing issue with Chief Engineer's Office.



Level of Detail

- ◆ How much detail is enough?
 - ◆ All emissions must be quantified
 - ◆ Number of events
 - ◆ Reason for activity
 - ◆ All activities must be identified
- ◆ Examples
 - ◆ Pump maintenance – *insufficient detail*
 - ◆ Preventive maintenance or repair requiring the purging and opening of pumps – *may be acceptable*
 - ◆ Detailed listing of historical repairs made to pumps – *acceptable, but may be impractical to obtain information*



Level of Detail (cont.)

- ◆ **This issue is still under discussion.**
- ◆ **Numerous activities with small emissions.**
 - ◆ **Discussing with Regional Offices**
- ◆ **Ties to level of recordkeeping that may be required and enforceability of permit.**



Partial Permitting

- ◆ **Cannot authorize MSS by permit if equipment is authorized by PBR**
- ◆ **Must authorize all emissions associated with an activity at the same time**

Example: Must authorize controlled and uncontrolled emissions associated with a maintenance activity not just the emissions from a common control device



Issues That Have Been Resolved

- ◆ **Public notice is required if the permitted allowable emissions increase.**
- ◆ **Modeling and Health Effects review will be required- be prepared.**
- ◆ **Fee will be required.**
- ◆ **Recordkeeping will be required.**



Final Comments

- ◆ **Chemical MSS applications due January 5, 2008.**
- ◆ **Plan other permit actions accordingly to avoid delays.**
- ◆ **Early MSS applications may be voided if information is received in a timely manner.**



QUESTIONS

