

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:

SO ₂	NSPS Subpart J 60.104(a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm) <u>for refinery fuel gas (RFG) and/or flexigas (FXG)</u>	NSPS Subpart J 60.105(a)(4) and 60.105(e)(3)	C	H ₂ S analyzer <u>for refinery fuel gas (RFG) and/or flexigas (FXG)</u>
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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	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
See Table VII – AU & CD for additional requirements.							
SO ₂	NSPS Subpart J 60.104(a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm)	NSPS Subpart J 60.105(a)(4) and 60.105(e)(3) <u>for refinery fuel gas and flexigas</u>	C	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 Subpart J 60.104 (a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm) for CR-2 vent gas	40 CFR 60.13(i) for CR-2 vent gas	P	Monitoring, records, and reporting for CR-2 vent gas

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

SO ₂	NSPS Subpart J 60.104(a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm) for refinery fuel gas (RFG) and/or flexigas (FXG)	NSPS Subpart J 60.105(a)(4) and 60.105(e)(3)	C	H ₂ S analyzer for refinery fuel gas (RFG) and/or flexigas (FXG)
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4. In Table VII-BY, modify the following two line item as follows:

SO₂	NSPS Subpart J 60.104(a)(1)	Y		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	C	H₂S analyzer
SO ₂	NSPS Subpart J 60.104 (a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm) for CR-2 vent gas	40 CFR 60.13(i) for CR-2 vent gas	P	Monitoring, records, and reporting for CR-2 vent gas

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

SO ₂	NSPS Subpart J 60.104(a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm) for refinery fuel gas (RFG) and/or flexigas (FXG)	NSPS Subpart J 60.105(a)(4) and 60.105(e)(3)	C	H ₂ S analyzer for refinery fuel gas (RFG) and/or flexigas (FXG)
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6. Modify Table VII-AQa as follows:

Table VII – AQa
Applicable Limits and Compliance Monitoring Requirements
S1480 – 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)	Y		Fuel gas H ₂ S limited to 0.1 gr/dscf (163 ppm)	NSPS Subpart J 60.105(a)(4) and 60.105(e)(3) for refinery fuel gas	C	H ₂ S analyzer
SO ₂	NSPS Subpart J 60.104(a)(1)	Y		Fuel gas H ₂ S limited to 0.1 gr/dscf (163 ppm) for vent gases from Sulfonation Unit SO ₂ Adsorber and Lubricants Hydrotreater #1 Vacuum Flash Dryer	40 CFR 60.13(i) for Sulfonation Unit SO ₂ Adsorber vent gas for S1480 and Lubricants Hydrotreater #1 Vacuum Flash Dryer vent gas for S1484	P	Monitoring, records, and reporting for vent gases from Sulfonation Unit SO ₂ Adsorber and Lubricants Hydrotreater #1 Vacuum Flash Dryer

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

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

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 Subpart J 60.104(a)(1)	Y		Fuel gas H ₂ S limited to 0.10 gr/dscf (163 ppm) <u>for vent gas from Lubricants Hydrotreater #2 Vacuum Flash Dryer</u>	40 CFR 60.13(i) for Lubricants Hydrotreater #2 Vacuum Flash Dryer vent gas	P	Monitoring, records, and reporting <u>for vent gas from Lubricants Hydrotreater #2 Vacuum Flash Dryer</u>