

TECHNICAL REVIEW: AIR PERMIT BY RULE

Permit No.:	148251	Company Name:	Motiva Enterprises LLC	APD Reviewer:	David Reyna
Project No.:	273469	Unit Name:	Port Arthur Refinery	PBR No(s).:	106.261, 106.262

GENERAL INFORMATION			
Regulated Entity No.:	RN100209451	Project Type:	Permit by Rule Application
Customer Reference No.:	CN600124051	Date Received by TCEQ:	August 21, 2017
City/County:	Port Arthur, Jefferson County	Date Received by Reviewer:	
Physical Location:	2555 Savannah Ave		

CONTACT INFORMATION					
Responsible Official/ Primary Contact Name and Title:	Greg Lucchesi General Manager	Phone No.:	(409) 989-7001	Email:	GREG.LUCCHESI@MOTIVA.COM
Technical Contact/ Consultant Name and Title:	Ryan Yoes Environmental Specialist Air Permits	Phone No.:	(409) 971-6248	Email:	RYAN.YOES@MOTIVA.COM

GENERAL RULES CHECK	YES	NO	COMMENTS
Is confidential information included in the application?	X		
Has the PBR fee been paid?	X		
Is this registration certified?	X		
Is this an APWL site?		X	
Are there any upstream or downstream affects associated with this registration?	X		The downstream emissions have been evaluated will still meet the PBR representation. The only downstream impacts are the slight increase in load to the SRU in actual emissions.
Is planned MSS included in the registration?		X	In the MSS emission are in the NSR permit 6056.
Are there affected NSR or Title V authorizations for the project?	X		If yes, what is the number(s): NSR permit 6056.
Is each PBR > 25/250 tpy?		X	
Are PBR sitewide emissions > 25/250 tpy?		X	
Are there permit limits on using PBRs at the site?		X	
Is PSD or Nonattainment netting required?		X	
Do NSPS, NESHAP, or MACT standards apply to this registration?		X	
Does NOx Cap and Trade apply to this registration?		X	
Is the facility in compliance with all other applicable rules and regulations?	X		

DESCRIBE OVERALL PROCESS AT THE SITE
The Port Arthur Refinery (PAR) processes crude oil in several processing units into several finished products including aviation jet fuel, several grades of motor gasoline, diesel fuels and lubricating oil base stocks.

DESCRIBE PROJECT AND INVOLVED PROCESS
Motiva Enterprises LLC (Motiva) is submitting the Permit by Rule registration application to authorize the installation of additional fugitive piping components at the Delayed Coker Unit No. 2 (DCU2) authorized under Permit No. 6056. The purpose of this project is to authorize changes necessary to enable compliance with the Refinery Sector Rule (RSR) 40 CFR 63, Subpart CC that requires that the coke drum pressure be reduced to 2 psig before venting the coke drum to atmosphere during the quench cycle. Motiva currently reduces the coke drum pressure to 10 psig before venting the coke drum vent to atmosphere, the vent is hot steam released into the atmosphere. In order for the additional pressure reduction, to 2 psig, the project will be adding piping for a new ejector condenser which in turn goes to an new ejector drum which the end results is the conversion of the pressurized steam into water. This water will be processed in the current SRU at the site. The SRU is current authorized in the NSR permit and currently processes the water when the coke drum was reduced in pressure to 10 psig and will now process the additional water to reduce the pressure to 2 psig. The emissions added from the PBR are the fugitive components for the new piping. The PBR evaluatio include the new piping and downstream actual emission increases.

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TECHNICAL SUMMARY - DESCRIBE HOW THE PROJECT MEETS THE RULES

PBR 106.261/262 Compliance Demonstration

- The emission point(s) associated with the facilities or changes to facilities are located at least 100 ft from the nearest off-site receptor. Yes, it located greater than a 100 ft.
- The total new or increase emissions will comply with the applicable hourly and annual emission limits as represented in the table below. Yes, it will comply with emission limits.
- There are no changes to or addition of any pollution abatement equipment. There are no changes to or added abatement equipment.
- Visible emissions to the atmosphere, from any point or fugitive source, do not exceed 5.0 opacity in any six-minute period. It will not exceed the opacity limits.
- This registration is not for authorization for construction or to change a facility authorized under another section of this chapter or under standard permit. There are no there rules for this project.

PBR 106.261(2)							
Air Contaminant				Emission Limit		Actual Emissions	
				Lb/hr	Tpy	lb/hr	tpy
VOC (refinery petroleum faction since from coker)				6.00	10.00	0.03	0.15
PBR 106.262							
Air Contaminant	L	D	K	Emission Limit		Actual Emissions	
	mg/m³	ft		lb/hr	Tpy	lb/hr	tpy
H ₂ S	1.1	1,800	18	0.06	0.27	0.01	0.06
*TOTAL EMISSIONS:						0.04	0.21

*The downstream emissions impacted are from the SRU which if included in the total emissions would remain the same since its only <0.01 lb/hr and <0.01 tpy of emissions for VOC, H₂S, NO_x, and CO. The emissions demonstration may be found in section 5 of the permit application.

COMMUNICATION LOG

Date	Time	Name/Company	Subject of Communication
8/28/2017-10/25/2017		David Reyna, Richard Goetz, Jeff Greif/TCEQ and Les Montgomery, Robin Patrick/ RPS and Damian Fryoux, Laurie Carpenter, Ryan Yoes/Motiva	Several meeting were conduct to understand the project and for representations needed for the project to meet federal and pbr requirements. (documents in the PBR application) Motive has committed in the October 25, 2017 letter conduct sampling and recordkeeping of the PBR project to demonstrate it meets all of the federal and PBR rule requirements.

ESTIMATED EMISSIONS

EPN / Emission Source	VOC		NO_x		CO		PM₁₀		PM_{2.5}		SO₂		H₂S	
	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy	lbs/hr	tpy
DCU2QFUG/DCU2 Quench System Fugitives	0.03	0.15											0.01	0.06
TOTAL EMISSIONS (TPY):		0.15												0.06
MAXIMUM OPERATING SCHEDULE:	Hours/Day			Days/Week			Weeks/Year			Hours/Year		8,760		

SIGNATURE:	TECHNICAL REVIEWER	PEER REVIEWER	FINAL REVIEWER
			
PRINTED NAME:	Mr. David Reyna		Mr. Samuel Short
DATE:	October 27, 2017		October 30, 2017