"Colman, Christopher"
<CColman@hess.com>

10/01/2008 12:09 PM

To: Brenda Shine/RTP/USEPA/US@EPA, Ken Hustvedt/RTP/USEPA/US@EPA
cc
Subject: Odds and Ends

Brenda and KC,

1. Below is the data HOVENSA obtained on H2S and SO2 from the coker vent test. As this testing was not required by EPA, it was not included in the data package I sent you nor was the testing and data reduction quite as rigorous. As expected, SO2 is nominal. H2S is present, as expected.
Given the H2S data, it is reasonably clear that the depressurization level before venting to atmosphere is only a factor in emissions control from delayed coker. The disposition of the steam from coke drum quenching both before and after venting is also important. Prior to venting, Blowdown systems recover the dry gas and send it to the fuel gas system, avoiding/minimizing sulfur compound emissions. Flare based systems used for steam control either before or after venting will oxidize the reduced sulfur and emit SO2.

2. Table 1-5 of the test report I sent you reported the results in TPY for VOC. Run 2 reports far higher VOCs than any other run (38 TPY, almost 20 tons higher than next highest result) and the other runs were relatively consistent. Our operations people believe that a block valve that should have been closed (it must be done manually) was not closed during this test, which allowed substantial additional VOC to enter the steam vent.

3. I should have a CBI and non-CBI version of the HOVENSA heater study done for you shortly. Most of the useful data on design limitations is non-CBI. However, large chunks of the back end of the report are costing information and are CBI.

4. In case you were not working on this issue, the process heater MACT rule development group issued a 114 for process heaters in all industries. It requests NOx CEM data, in a tabular format. See pdf above. The survey is due Oct 4.

5. I am still waiting on study results for projected Nox performance on heaters that burn oil and gas at the same time. As soon as I get it, I will let you know. The Db case by case Nox limit setting process in 60.44b(f) for combined fired boilers fired with waste and natural gas is another option (obviously, there was insufficient information to set a limit) but the process looks fairly time and resource intensive. It might make sense as a backup.

Chris Colman
HOVENSA

Phil,

I received your voicemail today and put together the following tables for H2S and SO2 concentrations and emission rates measured during the source test. All measurements were taken with a multigas analyzer used by Hovensa's IH - the instrument was recently calibrated according to a label, and our operator had plenty of prior experience using such a device. We felt this was the most accurate way to measure H2S

on short notice, as it is fairly common to lose H2S out of Tedlar bags after even a few hours, and we had no way of knowing when these bags might make it back to Austin. These 30-minute Tedlar bag samples were analyzed on 6/10, so I would interpret them as having a low bias since the bags had been sitting around the lab for a couple of days before analysis.
Remember that Run 3 was the outlier, with less dry gas volume due to some sort of change in the Coker batch process.

Date	Run	Vent Activation @	Sampling Interval	Sampling Duration (min)	H_2S (ppmw)	SO_2 (ppmw)	Average Moisture (%)	H_2S (ppmd)	SO_2 (ppmd)
3-Jun	1	601	601-631	30	425	0	99.0	43,862	0
3-Jun	1	601	631-701	30	608	15.2	98.7	46,754	1169
6-Jun	3	1408	1438-1508	30	130	0	99.4	21,357	0
8-Jun	4	632	632-702	30	683	3.41	99.1	71,874	359

The following table presents H2S and SO2 emission rates developed from the concentration data, however, the flowrate data is preliminary. I have calculated a lb/cycle rate based upon a 120 minute venting cycle.
I'll send new results as soon as I work up a more comprehensive flowrate profile as well as vent cycle durations based upon final drum pressures.

Date	Run	Vent Activation @	Sampling Interval	Sampling Duration (min)	H_2S (ppmd)	SO_2 (ppmd)	Average Flowrate (dscfm)	H_2S (lb/min)	SO_2 (lb/min)	H_2S (lb/cycle)	SO_2 (lb/cycle)
3-Jun	1	601	601-631	30	43,862	0	199	0.772	0	92.7	0
3-Jun	1	601	631-701	30	46,754	1169	211	0.873	0.0410	105	4.92
6-Jun	3	1408	1438-1508	30	21,357	0	58	0.110	0	13.1	0
8-Jun	4	632	632-702	30	71,874	359	196	1.25	0.0117	150	1.41

Regards,

Chris Weber
URS Corporation
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Measurements Group
512.419.5369 office
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(See attached file: 1001085717.pdf)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

[OMB Control No. 2060-0616]
August 15, 2008

Amerada Hess (Port Reading) Corporation
Environmental Compliance Manager
750 Cliff Rd
Port Reading, NJ 7064

Re: Requirement to provide information according to Title 42 of the United States Code, Chapter 85, Subchapter I, Part A, section 7414 (42 U.S.C §7414)

Dear Environmental Compliance Manager:

The U.S. Environmental Protection Agency (EPA) is collecting information to develop a revised National Emission Standard for Hazardous Air Pollutants (NESHAP) for boilers and process heaters under section 112 of the Clean Air Act (CAA), and revised standards for commercial and industrial solid waste incineration (CISWI) units covered by section 129 of the Act. These boilers, process heaters, and CISWI units will be collectively referred to as "combustion units" for this letter.

Under sections 112 and 129, the CAA requires existing sources to meet an emission limit equal to the average emission limit achieved by the best performing 12 percent of the existing sources in each subcategory. The CAA also requires new sources to meet an emission limit equal to the best controlled source in each subcategory. To develop the CAA regulations, we are requesting your help in acquiring information for combustion units at the following facility:

Amerada Hess (Port Reading) Corporation
750 Cliff Rd
Port Reading, NJ 07064

We are requesting this information under the authority given to us within section 114 of the CAA (42 U.S.C. §7414), as explained further below, and request that you send your completed surveys to us by **October 4, 2008.** The law, as written in the United States Code (42 U.S.C. §7414), requires that you complete the enclosed survey and return it to us.

Trk No.:BLR-1607

In December 2000, emissions standards for CISWI units were promulgated at 40 CFR Part 60 Subpart CCCC *(see 65 FR 75338)*. Further, in September 2004, a NESHAP was promulgated for boilers and process heaters at 40 CFR Part 63 Subpart DDDDD (see *69 FR 55218*). Separately, EPA promulgated a rule revising the definition of "commercial and industrial solid waste" *(70 FR 55568)*. This definition was used to determine which of the two rules applied to units with heat recovery.

All of these rules have been remanded to EPA by the D.C. Circuit Court of Appeal. The CISWI standards were remanded to EPA in response to the Agency's request for a voluntary remand. Sierra Club V. EPA, No. 01-1048. The boiler and process heater NESHAP was vacated and remanded to EPA on June 8, 2007. NRDC V. EPA, 489 F.3d. 1250 (D.C. Cir. 2007). In the June 8, 2007 decision, the court also vacated and remanded EPA's CISWI definitions rule, in which the Agency had defined "commercial and industrial solid waste" to exclude materials combusted in units for energy recovery. The court held that the plain meaning of the statute required EPA to regulate under section 129 of the Act "any" combustion unit that combusts "any" solid waste material. Under section 129(g), "solid waste" is to have the meaning established by the Administrator under the Solid Waste Disposal Act. Therefore, combustion units that combust any solid waste, as that term is defined by the Administrator under the Solid Waste Disposal Act, will be subject to emissions standards under section 129. Combustion units that do not combust any solid waste will be subject to emissions standards under section 112.

Both the 2004 boiler and process heater standard and the 2000 CISWI standard were based on information on combustion units gathered for the Industrial Combustion Coordinated Rulemaking, complimented by additional survey data received from facilities combusting non-fossil materials. These data sources are over 10 years old. When the Agency recently compared these data to facilities submitting initial notifications to comply with the vacated 2004 boiler standard, a large disparity was identified in the number of potentially affected units at major sources of hazardous air pollutants (HAP). Since the last combustion unit data gathering effort, many sources have shut down, others have selected to operate with a limit on their HAP emissions in order to avoid being subject to the boiler and process heater NESHAP, and some units have switched out older solid fuel units for newer equipment due to increased insurance and maintenance costs. Therefore, the Agency has concluded that obtaining updated information will be crucial to informing its decision on a revised NESHAP standard for boilers and process heaters and on revised standards for CISWI units.

We are sensitive to the amount of time and effort required to complete these surveys. Therefore, we have tried to automate your internal review and response time by providing an electronic spreadsheet response format. We have also consulted with industry trade groups to re-word questions and add questions that will allow EPA to review variability within combustion unit subcategories. We have also designed the survey into four separate sections that will apply to specific types of combustion units at the facility.

On the survey Web-site (http://survey.erg.com/ss/wsb.dll/s/7g8d) you will find an 18-page document containing instructions on how to complete the survey, example responses, survey questions, and survey definitions. The information gathered in this survey will help us

assess the types of fuels, control devices, combustor design, control devices, emission rates, and work practice standards used by facilities with combustion units. The survey Web-site, also includes a series of seven (7) Microsoft© Excel spreadsheet files that you should use to answer the survey questions. Please complete the spreadsheets for each combustion unit used at the facility listed on page 1 of this letter.

Using the information you provide to us in this survey, along with similar information we receive from other facilities, we will revise the population of potentially affected combustion units under sections 112 and 129 of the Act, and update existing emission test data and fuel/material analysis information to address variability. These data will be used by the Agency to develop a revised NESHAP for boilers and process heaters under sections 112 of the Act, and revised standards for incineration units covered by section 129 of the Act.

Enclosure 1 contains a summary of our legal authority in section 114 of the CAA to obtain the information requested in these surveys. If you believe that providing any specific information to us would reveal a trade secret, please identify this information clearly in your response. However, please do not label your entire response "Confidential" if only a portion includes trade secrets. You can see in Enclosure 1 the type of information that EPA may ask of you at a later time to prove that any information you have so identified is truly confidential. Any information determined to be a trade secret will be protected by 18 U.S.C. 1905. If you do not claim as confidential any of the information in your returned survey, we can make this information available to the public without notifying you further (40 CFR §2.203(a)(2)). (See 40 CFR part 2, subpart B, for EPA's regulations regarding the confidentiality of business information.) Because section 114 of the CAA does not allow emission data to be claimed as confidential, the emission data you provide to us can be made available to the public. A detailed explanation of what we consider to be emission data is contained in Enclosure 2.

We have contracted RTI International (RTI) (Contract No. EP-D-06-118) to help us gather information about combustion units at your facility. RTI has subcontracted with Eastern Research Group (ERG) to conduct the survey and analyze the survey data. As noted in Enclosure 3, we have designated RTI and ERG to be our authorized representatives. Therefore, RTI and ERG have the same rights discussed above and in Enclosure 1 as EPA has. This means that RTI will have access to all information provided to us in your completed survey. As our designated representative, RTI and ERG must, by law, also abide by the requirements of 42 U.S.C. §7414(c) in regard to the confidentiality of what you claim to be trade secrets.

Enclosure 4 summarizes our policies and procedures for handling trade secret information and describes how our contractor also is required to use the same procedures as we do. Because our contractors or other authorized representatives are required to follow the requirements in Enclosure 4, we believe that we can ensure your rights and protect any privileged information you submit to us.

If you need clarification on the information we are requesting, please contact Amanda Singleton, ERG, at 919-468-7807 (e-mail combustionsurvey@erg.com). In order to meet court ordered deadlines, we are requesting that survey responses be provided in an electronic

spreadsheet format as shown on the survey Web-site. To submit the survey, please e-mail the completed spreadsheets to combustionsurvey@erg.com. If you have questions on the need for the survey or if you are submitting confidential information, as described in Enclosure 2, you may submit this information on CD-ROM by using either U.S. Postal Service Express Mail, registered mail, or a private courier to:

James Eddinger
US EPA Mailroom (D243-01)
United States Environmental Protection Agency
Office of Air Quality Planning and Standards
Research Triangle Park, NC 27711

Please return the completed survey spreadsheets by **October 4, 2008.** I am sure you understand how important it is for the EPA to use the very best information available to develop the most meaningful standard. Your help in providing this information is greatly appreciated.

Sincerely,

P. Tsirigotis

Peter Tsirigotis
Director
Sector Policies and Programs Division

4 Enclosures

cc: Walter Mugdan, USEPA, Region 2 (2PM-PA), Air Division Director New York, NY (w/o Enclosures)
Mr. Ed Choromanski, NJ Dept of Environmental Protection, Robbinsville, NJ (w/o Enclosures)