

EPA Comments for Proposed Title V Permit Renewal Evaluation for Alon Bakersfield Refinery (Facility ID S-34, Project # S-1070742)

Comment 1:

The CAM analysis on page 41 of the engineering evaluation states that only four emission units (S-34-1-14, ‘-6-7, ‘-11-10, and ‘-42-6) have add-on controls for at least one pollutant. EPA reviewed the equipment in the proposed Title V renewal permit and found that the permit requires that emission units listed below to be vented to one or more vapor collection and control systems. In addition, several of the permit conditions require that vapors from these units be discharged only to a refinery fuel gas or flare gas system, and a control device with a destruction efficiency of 95%. So it appears that these units are subject to an emission limitation or standard (e.g., destruction efficiency of 95%) and have add-on controls which need to be evaluated under CAM.

EPA also notes that consistent with comments we have recently provided to the District regarding other proposed Title V renewal permits, vapor recovery systems required to be vented to a control systems are not “inherent process equipment” which is exempt from CAM requirements. As the District reevaluates the permit units listed below, please keep this determination in mind, where applicable. EPA also requests that when a type of equipment is evaluated for CAM applicability, the CAM discussion must list all of the emission units covered by that evaluation.

- S-34-5-5
- S-34-8-5
- S-34-9-10
- S-34-10-10
- S-34-13-4
- S-34-14-4
- S-34-15-4
- S-34-16-4
- S-34-17-4
- S-34-18-4
- S-34-19-4
- S-34-21-4
- S-34-22-4
- S-34-23-4
- S-34-24-4
- S-34-25-5