



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

April 5, 2012

Mr. Sam D. Sanders
Sr. Environmental Engineer
Valero Refining-Texas, LP, Corpus Christi Refinery
PO Box 9370
Corpus Christi, TX 78469-9370

Re: Alternative Monitoring Plans ("AMPs")
Steam Methane Reformer Pressure Swing Adsorption Off-Gas and Catalytic Reformer
Unit Fuel Gas from Fuel Gas Drums Nos. 1 & 2
New Source Performance Standards ("NSPS") for Refineries
Valero Refining-Texas, LP, Corpus Christi West Plant ("Valero CC West")
Corpus Christi, Nueces County, TX

Dear Mr. Sanders:

This letter is in response to your request dated January 18, 2011 to discontinue two previously approved AMPs concerning fuel gas streams that you have identified as inherently low in sulfur content under 40 CFR Part 60 Subpart J (NSPS Subpart J). The Environmental Protection Agency (EPA) has evaluated your request in light of changes made to NSPS Subpart J on June 24, 2008 (73 Federal Register 35866), and finds that the two previously approved AMPs (EPA responses both dated January 13, 2005) are no longer necessary since an exemption provided in the rule applies to the streams, as explained below.

Specifically, the previously approved AMPs pertained to the Steam Methane Reformer Pressure Swing Adsorption Off-Gas vent stream and the Catalytic Reformer Unit Fuel Gas from Fuel Gas Drums Nos. 1 & 2 vent stream. The Steam Methane Reformer Pressure Swing Adsorption Off-Gas stream is produced in a hydrogen plant and combusted in the Reformer Heaters. The Catalytic Reformer Unit Fuel Gas from Fuel Gas Drums Nos. 1 & 2 stream is produced in a catalytic reforming unit and combusted in the Catalytic Reforming Unit Heaters. Based upon the information you provided, the Steam Methane Reformer Pressure Swing Adsorption Off-Gas vent stream and the Catalytic Reformer Unit Fuel Gas from Fuel Gas Drums Nos. 1 & 2 vent stream are fuel gas streams that meet the exemption requirement of 40 CFR §60.105(a)(4)(iv)(C) {i.e., the vent streams are considered inherently low in sulfur since they are produced in process units intolerant to sulfur contamination}. Therefore, the fuel gas combustion devices do not need to meet the monitoring requirements of either 40 CFR §60.105(a)(3) or §60.105(a)(4).

If refinery operations change such that the sulfur content for either of these vent streams changes, then Valero CC West must document the change(s) and determine if the fuel gas

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stream(s) remain exempt. If it is determined that any of the streams are no longer exempt, continuous monitoring must begin within 15 days of the change in accordance with 40 CFR §60.105(a)(4)(iv). If you have any questions or concerns about this determination, please feel free to contact Daniel Hoyt of my staff at (214) 665-7326.

Sincerely,



David F. Garcia
Associate Director
Air/Toxics & Inspection
Coordination Branch

cc: Michael de la Cruz (TCEQ)
Salal Tahari (TCEQ)