

EPA Comments for Proposed Title V Permit Renewal Evaluation for Alon Bakersfield Refining Gas Terminal (Facility ID S-3303, Project # S-1070743)

Comment 1:

The CAM evaluation on page 16 of the engineering evaluation states that none of the emission units at this facility is equipped with an add-on control device and, therefore, no permit units are subject to CAM. EPA reviewed the equipment in the proposed Title V renewal permit and found that unit S-3303-1-5 is for a loading rack operation that is vented to a vapor collection and control system. In addition, condition 11 of the permit for this unit requires a VOC limit of 2 lb/hr, and conditions 16 and 28 contain operating limits for the vapor collection and control system. Based on this information, it appears that unit S-3303-1-5 is subject to an emission limit and has add-on controls which need to be evaluated under CAM. Please reevaluate the CAM applicability determination for this device and add any CAM provisions if required.

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 unit listed above, please keep this determination in mind, where applicable.