

EPA Comments for Proposed Title V Permit Renewal Evaluation for Tricor Refining LLC, Facility ID S-44, Project # S-1070111

EPA appreciates the opportunity to comment on the District's proposed Title V permit renewal for Tricor Refining LLC. EPA has the following comments on the permit.

1. The CAM analysis in the engineering evaluation must address CAM applicability for the following units. If CAM applies, adequate monitoring must be included in the permits for these units.
 - a. S-44-194-4 which is subject to a VOC limit and requirements to vent to a control system (condition 2);
 - b. S-44-150-3 which is subject to a VOC limit and requirements to vent to a control system (condition 2); and
 - c. S-44-16-4. Condition 3 requires the tanks to vent to a lean oil absorber and carbon canister (i.e., the control device), condition 4 requires VOC concentration to be monitored, and condition 5 requires these systems to operate at least at 99.99% by weight (i.e., the emission limit).

2. Unit S-44-5-12 is described as standby equipment and used when the cogeneration facility (Oildale Energy) is not in operation. The engineering evaluation states that specifying daily CAM monitoring would have an adverse effect since this unit is not operated on a daily basis. However, the engineering evaluation does not show how CAM does or does not apply. Please clarify CAM applicability to the unit. If CAM applies, adequate monitoring must be included in the permits for this unit. Also, although condition 3 requires the boiler not to be fired during operation of the cogeneration facility, the permit does not limit hours of operation of the unit or contain conditions regarding how often the Oildale Energy facility operates. Please revise the permit to provide operating limitations for the boiler.