

US EPA ARCHIVE DOCUMENT

From: [Knowles, Daren](#)
To: [Aisling, Kathleen](#)
Subject: Flint Hills Resources West Refinery PSD Greenhouse Gas Permit Response to Information Request Revision
Date: Wednesday, March 19, 2014 3:56:38 PM
Attachments: [West Domestic Crude Project PSD GHG Permit Response to Information Request Revision_031914.pdf](#)

Kathleen,

As mentioned in our phone conversation, some corrections need to be made to the methane and nitrous oxide emission calculations for the CCR Hot Oil Heater (39BA3901), the DHT Stripper Reboiler (37BA2), the Various Boilers, and the MSS Combustion. The factor in the "Emission Factor (lb/MMBtu)" column was calculated based on converting the factor for "Natural Gas" rather than "Petroleum" in Table C-2 of 40 CFR Part 98, Subpart C. These sources burn refinery fuel gas or control petroleum vapors, so the lb/MMBtu factor should be based on the "Petroleum" factor. These corrections will slightly increase the proposed methane, nitrous oxide, GHG (mass basis), and CO₂e emission limits for the CCR Hot Oil Heater. It will also slightly increase the total PSD increases for methane, nitrous oxide, GHG (mass basis), and CO₂e. The revised application pages reflecting the corrections to the emission rate calculations and changes to emission limits and the total PSD increases are attached.

Please feel free to contact me at 361.242.8301 if you have any questions.

Thanks, Daren