

US EPA ARCHIVE DOCUMENT

June 25, 2013

Ms. Erica G. Le Doux
U.S. Environmental Protection Agency, Region 6
Air Permits Section (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Flint Hills Resources Corpus Christi, LLC - West Refinery
PSD Greenhouse Gas Permit Application
Domestic Crude Project
Response to Information Request

Dear Ms. Le Doux:

On behalf of Flint Hills Resources Corpus Christi, LLC (FHR), I am submitting responses to the information request you sent via email on June 18, 2013 in regards to the PSD Greenhouse Gas (GHG) permit application FHR submitted to EPA Region 6 on December 18, 2012. The permit application seeks to authorize a project at FHR's West Refinery to allow the refinery to process a larger percentage of domestic crude oil. Responses to your information request are provided on the following pages. Additional information is provided in Attachment A.

In the event you have additional questions or would like to discuss further, please contact Daren Knowles at (361) 242-8301.

Sincerely,



Valerie Pompa
Vice President and Manufacturing Manager

VP/DK/syw
Air 13-224; W 3 N 22

Enclosure

cc: Air Section Manager, TCEQ, Region 14, Corpus Christi, w/enclosure
Mr. Kris L. Kirchner, P.E., Waid Environmental, Austin, w/enclosure
Mr. Jeff Robinson, EPA Region 6, w/enclosure (via email)
Ms. Melanie Magee, EPA Region 6, w/enclosure (via email)

RESPONSES TO INFORMATION REQUEST

1. **The following EPN was not shown on the initial process flow diagram submitted in the application or the revised process flow diagram submitted in the response. Please supplement process flow diagrams indicating the following emission sources:**

MSSFUGS-DC (New)

IFRTK1 (New)

IFRTK2 (New)

FHR's Response

A new process flow diagram for MSSFUGS-DC is provided in Attachment A. As mentioned in the original submittal and FHR's May 16, 2013 response, Tanks IFRTK1 and IFRTK2 will not result in GHG emissions during normal operation due to the types of products they will be storing. However, the tanks will result in GHG emissions during maintenance because emissions generated during tank maintenance activities will be controlled using combustion sources. Therefore, these two new tanks have been included on the new process flow diagram for MSSFUGS-DC.

2. **On page 105 of the initial process flow diagram, one block is used to depict the cooling tower fugitives. However, two cooling towers are listed as part of this project:**

F-S-201 Mid-Plant Cooling Tower (Modified)

F-S-202 Mid-Plant Cooling Tower No.2 (New)

Please provide supplemental information to the process flow diagram to show both cooling towers

FHR's Response

Both cooling towers now appear on the revised process flow diagram provided in Attachment A.

3. **On page 3 of the response provided by FHR, it is stated that seven boilers potentially will be affected by the project. These boilers could potentially see an increase in utilization as a result of the project, but the total incremental increase from all of the boilers will not be more than 96 MMBtu/hr. Therefore, the seven boilers have been grouped together into an emission source called "Various Boilers" and as so represented on the process flow diagram. Please provide written confirmation that the project will not cause a change in method of operation and permit limit for *each* of the boilers that comprise the "Various Boilers."**

FHR's Response

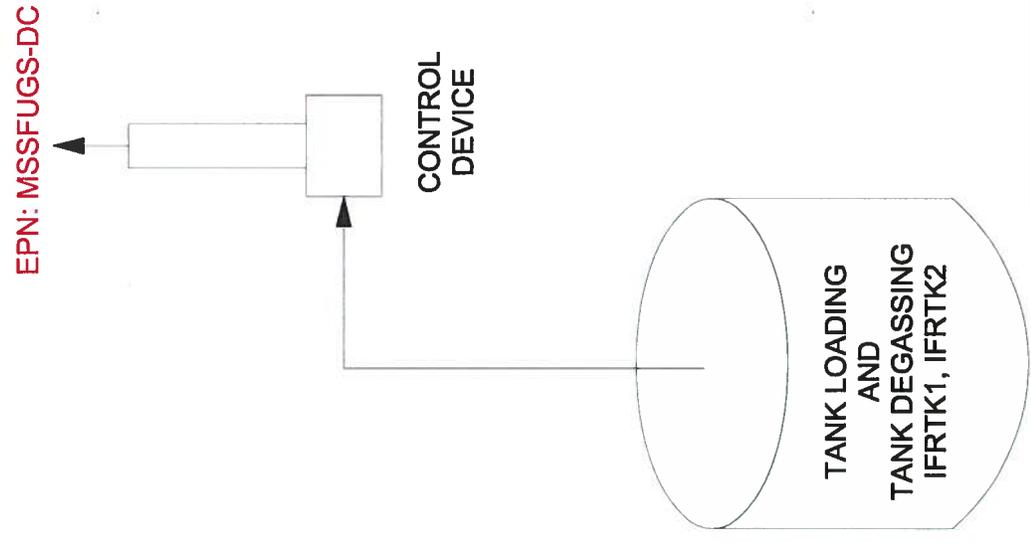
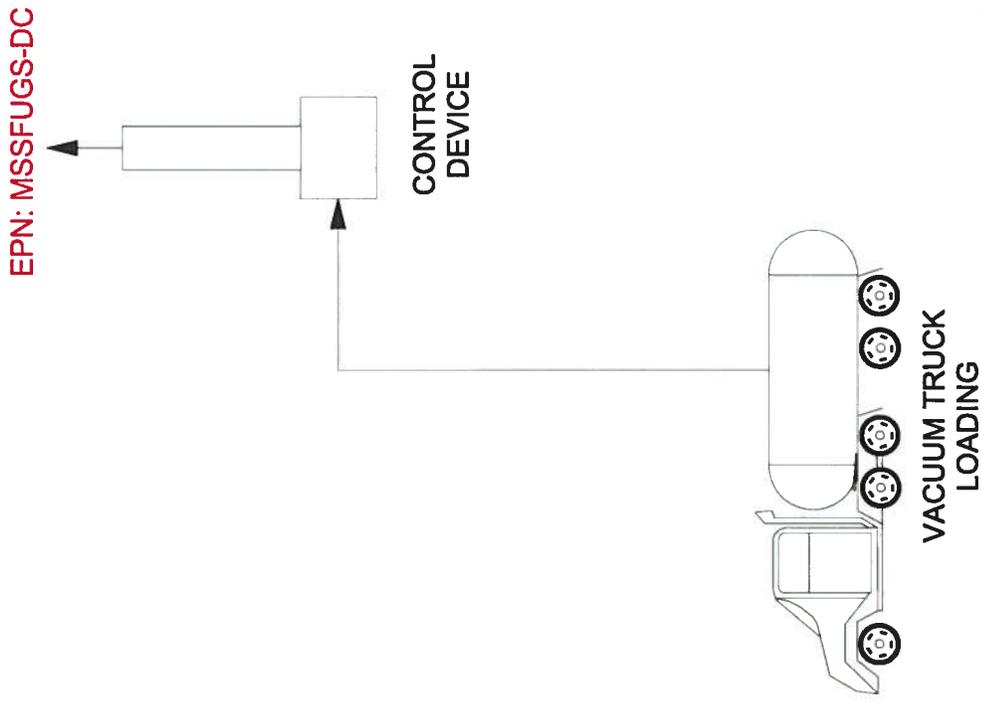
There was a typo on Page 3 of the initial response and on the revised process flow diagram for the boilers provided in FHR's May 16, 2013 response. There are six boilers, not seven, potentially affected by the project. A revised process flow diagram for the boilers is provided in Attachment A.

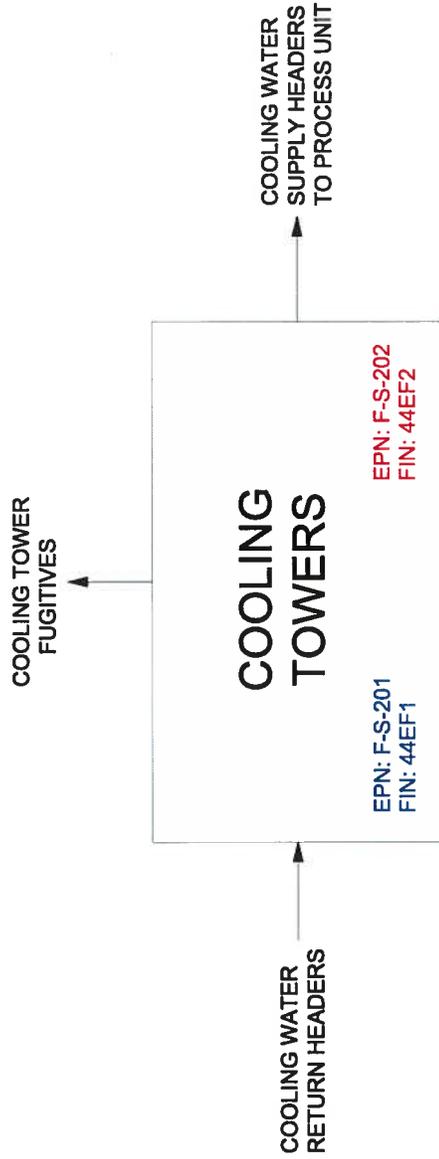
FHR confirms that the project will not cause a change in method of operation for any of the boilers. As represented in the permit application, the total incremental increase in duty from the six boilers combined will not be more than 96 MMBtu/hr. Additionally, although FHR expects that this increase in duty will be distributed among multiple boilers, we have confirmed that an increase in duty of 96 MMBtu/hr above baseline (annual average for 2011-2012) operations at any one of the six boilers would not result in an exceedance of any boiler's permitted emission rates.

ATTACHMENT A

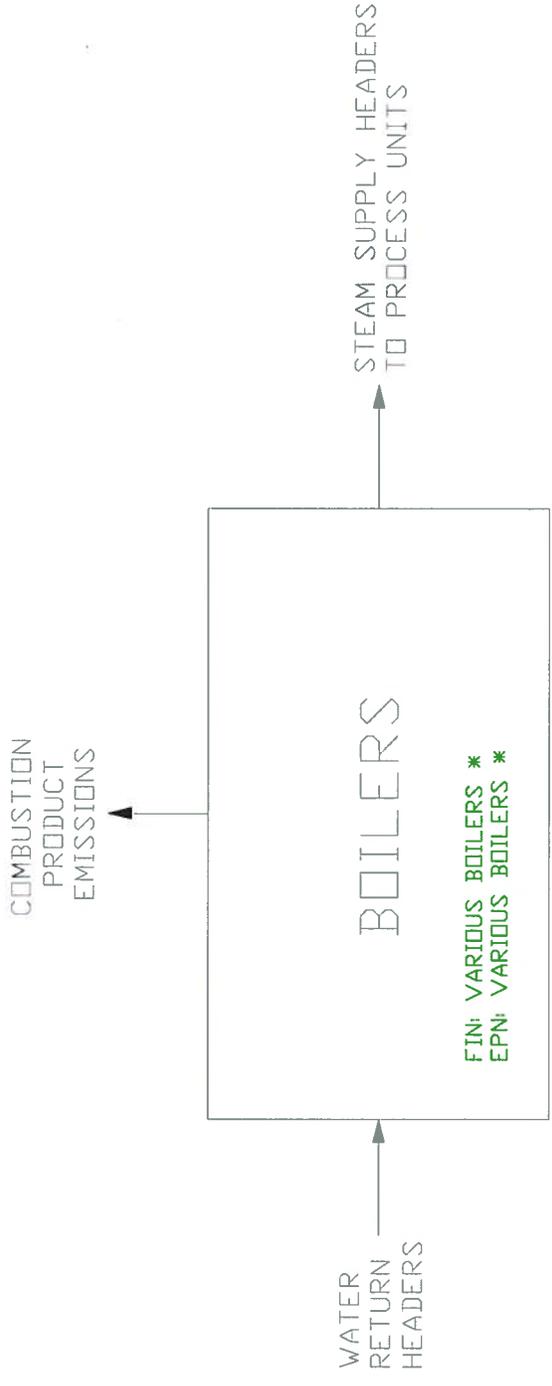
Revised Process Flow Diagrams

START-UP/SHUTDOWN/MAINTENANCE ACTIVITIES FROM DOMESTIC CRUDE PROJECT PROCESS FLOW DIAGRAM





PROCESS FLOW DIAGRAM COOLING TOWERS



* There are six boilers potentially affected by the project. Any of these boilers could potentially see an increase in utilization as a result of the project. Therefore, the six boilers have been grouped together into an emission source called Various boilers. Each of the boilers has their own vent stack.