

WAC 173-400 General Regulations for Air Pollution Sources

Stakeholder Meeting #2

Puget Sound Clean Air Agency Office, Seattle, WA

October 16, 2018

Attendees:

Colleen Stinson, ECY
John Gustafson, USOR
Jason Alberich, ECY
Ken Johnson, WSPA
Jim Verburg, BP Cherry Point
Nancy Pritchett, ECY
Agata McIntyre, NWCAA
Philip Gent, ECY
Debebe Dererie, ECY
Ralph Munoz, PSCAA
Carole Cenci, PSCAA
Jerry Tippet, Chemtrade
Lyn Tober, NWCAA
Sandy Paris, Phillips 66
Tim Figgie, Shell
Megan Rodrigo, Lester

- Colleen Stinson facilitated the meeting and opened the meeting at 2:00 pm.
- We made introductions and reviewed the meeting minutes from the September 12, 2018 meeting. There were no comments or changes to the minutes.
- We reviewed the options of rulemaking with a goal of a rule that was acceptable to all stakeholders, protective of the NAAQS and approvable by EPA. Not proceeding with rulemaking is an option but we are continuing with the rulemaking at this time. The timeline was reviewed with a reminder that after this meeting we only have three scheduled stakeholder meetings and that we have to give the draft language to the economist by March.
- We reviewed and discussed the seven EPA Criteria for an alternative emission limitation:
 1. The revision is limited to specific, narrowly defined source categories using specific control strategies;
 2. Use of the control strategy for this source category is technically infeasible during startup or shutdown periods;
 3. The alternative emission limitation requires that the frequency and duration of operation in startup or shutdown mode are minimized to the greatest extent practicable;
 4. As part of its justification of the SIP revision, the state analyzes the potential worst-case emissions that could occur during startup and shutdown based on the applicable alternative emission limitation;
 5. The alternative emission limitation requires that all possible steps are taken to minimize the impact of emissions during startup and shutdown on ambient air quality;

6. The alternative emission limitation requires that, at all times, the facility is operated in a manner consistent with good practice for minimizing emissions and the source uses best efforts regarding planning, design, and operating procedures; and
 7. The alternative emission limitation requires that the owner or operator's actions during startup and shutdown periods are documented by properly signed, contemporaneous operating logs or other relevant evidence.
- It was proposed that the alternative emission limitation apply when the TGU is bypassed during a planned shutdown of an SRU to a cold state – this specifies the conditions related to the first criteria.
 - The second criteria is that the alternative emission limitation apply during a time that control is technically infeasible – when the TGU is bypassed and the feed is going to the incinerator there is no emission control.
 - We noted that we will not discuss modeling at this time because rule language would have to be further along first. It was acknowledged that we would have to decide relatively soon whether or not modeling would be done because of our March date for final draft rule language.
 - Rule language of Ecology, NWCAA, and PSCAA was discussed.
 - Tim Figgie will provide data on emissions during startup to better inform whether startup should be included in the alternative emission limitation. It does not currently include startup.
 - We need to go back through the rule and ensure we are consistently using the term “limitation” as opposed to “standard”.
 - Current rule language does not include hot standby in the alternative emission limitation. There were no comments.
 - Work practice standards of visual observations of sulfur amount and appearance were discussed. We requested that the terms would be defined better since some of them are relative terms such as “significant” amount of sulfur and liquid sulfur not appearing “dark”. WSPA noted that the observations should not require all of the observations but any of them so “and” should be replaced with “or”. We also determined that we should use the term “any” as opposed to “all” before listing the visual limitations. No objection was voiced.
 - The significance of the H₂S and SO₂ monitoring ratio was discussed. When it is below approximately 3 (H₂S):1 (SO₂), elemental sulfur is no longer being produced to lower the SO₂ emissions. Several WSPA members commented that this cannot be more rigidly defined since this number can vary from time to time and from facility to facility. WSPA committed to looking at the ratio monitor analyzer sub-section to clarify and get more information.
 - Length of advance notification for a planned shutdown was discussed. 24 hours is proposed. Jason mentioned that there may be need for public notification. Jim Verburg says that refineries can have a planned shutdown within less than 24 hours. An example was the Monday shutdown due to a pipeline fire in Canada. Discussion centered on how a shutdown such as this that was out of control of the refineries would be considered under this rule or by the permitting authority. There was some discussion whether this should be considered a planned shutdown or an upset. Phil brought up the point that we can get deep in the weeds examining “what if” scenarios and perhaps the discussion should be focused between local authorities and the facilities on what is the best avenue to address these issues. Ecology committed to checking in with Elena and see how we addressed this with the hog fuel or wood-fired boiler fuel language.
 - Ken Johnson of WSPA also mentioned WAC 173-400-040 (e)(i) as an example of a work practice standard that didn't include numerical limits. The 24 hour advance notification for

- shutdown, 40% opacity, and duration (15 minute period in any eight consecutive hours) which are numerical limits in that WAC were pointed out.
- Ralph Munoz asked whether it would be appropriate to do a BACT analysis. Tim said that it would be difficult to do because of the height of the stack.
 - We discussed the ability of California refineries to shutdown while staying under 2500 ppm. This may be due to taking more time for shutdown or technology such as scrubbers. Jim Verberg commented that the additional amount of sulfur that could be removed from the emissions by modifications to the work practices currently in place would be minimal. The hot sweep is really the only time that additional sulfur can be removed and there is always the possibility that sulfur will get stranded and be released to the incinerator. WSPA was asked to find out if there is a procedure or control device that allows refineries to shutdown without exceeding 1000ppm. Agata stated that in California they shut down low and slow and requested that WSPA check with their technical team on how that is done. Carole stated that we would need hard information on why this isn't doable and if safety is an issue that it be very clearly stated what the safety concern actually is.

Next Steps

1. **WSPA Sends input to Ecology by Friday, November 2.**
2. **Ecology updates rule language and disseminates to work group by Friday, November 9.**
3. **Stakeholder Meeting November 15 at PSCAA.**