



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

April 5, 2021

Greg Lucchesi, General Manager
Motiva Enterprises, LLC
2555 Savannah Avenue
P.O. Box 712
Port Arthur, TX 77641-0712

RE: Revised Alternative Monitoring Plan (AMP) – NSPS Subpart J and NESHAP Subpart UUU – Parametric Monitoring in Lieu of Continuous Opacity Monitoring System for FCCU No. 3 Catalyst Regenerator Wet Gas Scrubber at the Motiva Refinery located in Port Arthur, Texas; Motiva Enterprises LLC Consent Decree No. H-01-0978.

Dear Mr. Lucchesi:

This letter is in response to your request dated January 20, 2020, pertaining to modification of your approved AMPs¹ for the No. 3 Fluidized Catalytic Cracking Unit (FCCU) Wet Gas Scrubber (WGS) unit under New Source Performance Standards (NSPS) for Petroleum Refineries (40 CFR Part 60 Subpart J) and National Emission Standards for Hazardous Air Pollutants (NESHAP) for Petroleum Refineries (40 CFR Part 63 Subpart UUU). Upon review of all available information, the U.S. Environmental Protection Agency (EPA) approves Motiva Enterprises, LLC's (Motiva) request to modify the limits for parametric monitoring for the No. 3 FCCU WGS at the Port Arthur Refinery, as follows:

No. 3 FCCU

1. Minimum Liquid-to-Gas Ratio (L/G): 0.057 gal/scfm.
2. Minimum Water Pressure to Nozzles in Quench/Spray Tower (P_L): 44.31 psig.
3. Minimum Pressure Drop Across Filter/Cyclolabs (ΔP_C): 9.45 in H₂O.

Compliance for the above OPLs is determined on an hourly rolling average based on evaluation of results from three one-hour test runs, consistent with the FCCU operating conditions and corresponding test data from the most recent particulate matter performance test. Any parameter values that are less than the approved cut-off levels represent and shall be reported as a deviation. Motiva Port Arthur Refinery shall incorporate the terms of this AMP approval into the facility's New Source Review (NSR) and Title V permits for federal enforceability.

¹ See EPA AMP approval letter addressed to Mr. Greg Lucchesi (Motiva Enterprises, LLC) dated July 31, 2018.

Revised AMP Approval, Updated 2019

Motiva Enterprises, LLC Port Arthur Refinery, #3 FCCU WGS

Page 2 of 2

As per the requirements at 40 CFR § 63.1571(a)(5), Motiva Port Arthur Refinery shall conduct performance tests at least once every five years to verify that the established values for OPLs are still representative of facility operations and WGS performance, or to determine new representative values. A copy of each performance test report must be submitted to EPA and the permitting authority, along with any changes to the prior OPL values resulting from the data obtained during testing at the FCCU WGS.

If operations change from those represented in the enclosure for the FCCU operations at Motiva Port Arthur Refinery, this approval may become void and a new AMP request will be necessary. If you have any questions or concerns about this approval, please contact Emad Shahin of my staff at shahin.emad@epa.gov or at 214-665-6717.

Sincerely,

STEVEN
THOMPSON

Digitally signed by STEVEN THOMPSON
DN: cn=US, o=U.S. Government, ou=Environmental
Protection Agency, cn=STEVEN THOMPSON,
0.9.2342.1.9200300.100.1.1=#68001003652657
Date: 2021.04.05 19:17:53 -0500

Steve Thompson
Chief
Air Enforcement Branch

Enclosure

ec: Michael De La Cruz, Texas Commission on Environmental Quality,
michael.delacruz@tceq.texas.gov