



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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Ref: 8ENF-AT

**SENT VIA EMAIL**

Serena Yau  
Environmental Team Lead  
Salt Lake Refinery  
Chevron Salt Lake Refinery  
685 South Chevron Way  
North Salt Lake, Utah 84054  
[Serena.Yau@chevron.com](mailto:Serena.Yau@chevron.com)

Re: Initial Performance Test Waiver for FCC Triggering NSPS Ja

Dear Ms. Yau:

I am responding to your February 25, 2021 letter requesting a waiver from the initial performance test required when triggering the Standards of Performance for Petroleum Refineries for Which Construction, Reconstruction, or Modification Commenced After May 14, 2007, Subpart Ja (NSPS Ja). As discussed below, the U.S. Environmental Protection Agency approves your request with the conditions noted below.

**Background**

Your February 25, 2021 letter indicates that the Chevron Salt Lake City Refinery (Chevron) is completing a physical change to the Fluid Catalytic Cracking Unit (FCCU) and that the change will increase the sulfur dioxide (SO<sub>2</sub>) and nitrogen oxides (NO<sub>x</sub>) emission rates, therefore, making the FCCU subject to the NSPS Ja SO<sub>2</sub> and NO<sub>x</sub> requirements. In addition, your letter indicates that Chevron is accepting NSPS Ja applicability for the carbon monoxide (CO) standard during this change.

Per 40 CFR §60.8(a) and 40 CFR §60.104a(a), a performance test is required within 60 days after achieving maximum production rate, but no later than 180 days after initial startup, to determine initial compliance with each applicable emissions limit in §60.102a.

**Performance Test Waiver**

Per 40 CFR §60.8(b)(4), Chevron requests a performance test waiver and instead proposes to provide data from the existing continuous emission monitors (CEMS) to determine compliance with the FCCU NO<sub>x</sub>, SO<sub>2</sub>, and CO standards.

**EPA Response**

Pursuant to 40 CFR §60.8(b)(4), EPA waives the requirement for initial performance testing because Chevron will demonstrate by other means, i.e., CEMs, that the FCCU will be in compliance with NSPS Ja NO<sub>x</sub>, SO<sub>2</sub>, and CO standards. EPA's approval is contingent upon Chevron submitting a report that demonstrates compliance during the 180 days following initial startup after the change and that the

NO<sub>x</sub>, SO<sub>2</sub>, and CO CEMs, as well as the oxygen (O<sub>2</sub>) CEMs met the following requirements:

- 40 CFR §60.13(a), (d), (e), and (f);
- 40 CFR Part 60, Appendix B, including the relative accuracy (if relative accuracy testing was not conducted during the 180-day timeframe, then include the results from the most recent relative accuracy test); and
- 40 CFR Part 60, Appendix F, including passing the quarterly cylinder gas audits.

Additionally, the report must identify, during the 180 days following initial startup after the change:

- any periods of exceedances of the CO hourly emission standard and the NO<sub>x</sub> and SO<sub>2</sub> 7-day rolling average emission standard (regardless of cause); and
- any period of NO<sub>x</sub>, SO<sub>2</sub>, CO, and O<sub>2</sub> CEM downtime.

If you require more specific information regarding this subject, the most knowledgeable person on my staff is Laurie Ostrand, who can be reached at (303) 312-6437 or [ostrand.laurie@epa.gov](mailto:ostrand.laurie@epa.gov).

Sincerely,

SCOTT  
PATEFIELD

 Digitally signed by SCOTT  
PATEFIELD  
Date: 2021.03.22 14:17:53 -06'00'

Scott H. Patefield, Branch Chief  
Air and Toxics Enforcement Branch

cc: Harold Burge, Utah DAQ  
[hburge@utah.gov](mailto:hburge@utah.gov)