

## FACT SHEET

### Request for an Alternative Means of Emission Limitation at Flint Hills Resources LLC.

#### **Action**

- *October 6, 2021* – The U.S. Environmental Protection Agency (EPA) is requesting comments on an alternative means of emission limitation (AMEL) request for Leak Detection and Repair (LDAR) requirements in the Standards of Performance and National Emission Standards for Hazardous Air Pollutants for the Synthetic Organic Chemical Manufacturing Industry (SOCMI) and the Petroleum Refining Industry (40 CFR part 60 Subparts VV, VVa, GGG, GGGa, and part 63 Subparts H and CC.)
- The alternative proposed by Flint Hills Resources LLC. (FHR) would replace the manual component-by-component periodic EPA Method 21 (M21) monitoring requirements with a monitoring and documentation system comprised of continuously operating leak detection sensor networks (LDSN) and work practices that are detailed as a detection response framework (DRF).
- This AMEL would be a landmark use of continuous leak detection systems at a refinery. Continuous monitoring has the potential to detect leaks, especially large ones, much faster than the current practice of monitoring periodically using EPA Method 21. This potential reduction in large leaks alone would likely lead to less pollution and therefore cleaner air for communities that live and work near these sites.
- This AMEL would apply to two process units (mid-crude and meta-xylene) at FHR's West Refinery in Corpus Christi, Texas. EPA is taking comment on:
  - all aspects of the proposed AMEL; and
  - the specific operating conditions that FHR would follow to ensure that equivalent emissions reductions are achieved by this LDSN-DRF system.
- The Clean Air Act provides the ability for regulated sources to seek approval of an AMEL, which must achieve emission reductions at least equivalent to the existing standards.

#### **Background**

- FHR submitted this AMEL request because the continuous monitoring system represents a cost savings to them.
- Based on EPA's analysis of the information provided in FHR's request, we have determined the proposed AMEL will achieve emission reductions at least equivalent to compliance with the applicable M21 requirements.

#### **How to Comment**

- EPA will accept comment on this action for 45 days after publication in the *Federal Register*.
- Comments, identified by Docket ID No. EPA-HQ-OAR-2021-0299, may be submitted by one of the following methods:
  - Go to <https://www.regulations.gov/> and follow the online instructions for submitting comments.
  - Send comments by email: [A-and-R-Docket@epa.gov](mailto:A-and-R-Docket@epa.gov). Include Docket ID No. EPA-HQ-OAR-2021-0299 in the subject line of the message.
- Out of an abundance of caution for members of the public and our staff, the EPA

Docket Center and Reading Room are closed to the public, with limited exceptions, to reduce the risk of transmitting COVID-19. Hand deliveries and couriers may be received by scheduled appointment only. Our Docket Center staff will continue to provide remote customer service via email, phone and webform. We encourage the public to submit comments via <https://www.regulations.gov/> or email, as there will be a delay in process mail and no hand deliveries will be accepted.

- For further information on EPA Docket Center services, please visit us online at <https://www.epa.gov/dockets>.

### **For More Information**

- Interested parties can download a copy of this proposed action from EPA's website at the following address: <https://www.epa.gov/stationary-sources-air-pollution/alternative-means-emission-limitation-leak-detection-and-repair>
- Today's action and other background information are also available electronically at <https://www.regulations.gov/>, the EPA's electronic public docket and comment system.
- For further information about this action, contact Ms. Karen Marsh of EPA's Office of Air Quality Planning and Standards, at (919) 541-1065 or by email at [Marsh.Karen@epa.gov](mailto:Marsh.Karen@epa.gov).