



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1201 ELM STREET, SUITE 500  
DALLAS, TEXAS 75270

August 30, 2022

Ms. Becca Crumpler  
Environmental Manager  
Artesia Renewable Diesel Company LLC  
703 East Main Street  
Artesia, New Mexico 88210

RE: Performance Test Waiver and Alternative Monitoring Request - 40 Code of Federal Regulations (CFR) Part 60 Subparts NNN and RRR - Standards of Performance for Volatile Organic Compound (VOC) Emissions From Synthetic Organic Chemical Manufacturing Industry (SOCMI) Distillation Operations (Subpart NNN) and Reactor Processes (Subpart RRR) - Distillation Operations and Reactor Processes  
Artesia Renewable Diesel Company LLC, Artesia, NM

Dear Ms. Crumpler:

This letter is in response to your request dated January 20, 2022, on the above referenced waiver and alternative monitoring under New Source Performance Standards (NSPS). As delineated below, we are approving your request for meeting NSPS Subpart RRR in lieu of NSPS Subpart NNN requirements for testing, monitoring, and record-keeping *related specifically to the use of boilers and process heaters* for compliance with the standards of both Subparts.

In your letter, you requested a substitution of NSPS Subpart NNN for NSPS Subpart RRR as an alternative flow and temperature monitoring for the vent streams associated with the following two product stripper and naphtha stabilizer columns:

- W-2601 (product stripper column)
- W-2602 (naphtha stabilization column)

You also requested a waiver of the NSPS performance testing requirement for the boilers and furnaces shown in the following table, due to the off-gas from the product stripper and naphtha stabilizer columns being commingled with refinery fuel gases and used as primary fuel. Your letter indicates that the off-gas from these columns is normally routed to the HollyFrontier Navajo Refining LLC (HFNR) fuel gas system, where it is commingled with refinery fuel gas and then burned as a primary fuel. Our understanding is that the fuel gas system is comprised of boilers and process heaters with heat input capacities less than 150 million British thermal units per hour (MMBTU/hr) and greater than 150 MMBTU/hr. Vent gases mixed with refinery fuel gas constitute the primary fuel for these boilers and furnaces, and this fuel mixture is introduced into the flame zone of each unit. In addition, none of the distillation vents are equipped with a bypass directly to the atmosphere.

<b>Unit No.</b>	<b>Unit Name</b>	<b>Heat Input MMBtu/hr (HHV)</b>
H-0009	Unit 13 Naphtha Splitter Reboiler	49
H-0011	Unit 21 Vacuum Flasher Heater	42
H-0018	Naphtha HDS Reboiler	36
H-0019	South Crude Charge Heater	60
H-0020	South Crude Charge Heater	87
H-0028	Unit 21 Heater H-28	14
H-0030	Unit 06 Charge Heater	47
H-0040	Unit 13 Charge Heater	47
H-0312	Unit 10 FCC Feed Heater	39
H-0352	Unit 70 CCR Heater	70
H-0353	Unit 70 CCR Heater	90
H-0354	Unit 70 CCR Heater	62
H-0355	Unit 70 Stabilizer Reboiler Heater H-355	27
H-0362	Unit 70 CCR Heater	44
H-0363	Unit 70 CCR Heater	56
H-0364	Unit 70 CCR Heater	39
H-0421	Unit 44 Charge Heater	30
H-0464	SRU Hot Oil Heater	11
H-473	SRU 2 TGI	34
H-0600	Depropanizer Reboiler Heater	93
H-0601	Unit 33 Charge Heater	87
H-8801	Unit 63 Hydrogen Plant Reformer Furnace	67
H-8802	Unit 63 Hydrogen Plant Reformer Furnace	67
H-3403	Hydrocracker Reactor Charge Heater	36
H-3402	Hydrocracker Fractionator Reboiler 1	58
H-5401	Unit 54 HDS Reactor Heater	24
H-3101	SRU3 Hot Oil Heater	12
H-3103	SRU 3 TGI	10
H-2601	Unit 26 RDU Reactor Heater	43

Based on the information submitted, the United States Environmental Protection Agency (EPA) hereby approves your request to waive the initial performance test for those vents specified in your letter as being *introduced with the primary fuel* into a boiler or process heater in accordance with 40 CFR §60.8(b) and as provided for in §60.704(b)(5). Furthermore, EPA approves your request to implement the Subpart RRR monitoring provisions in lieu of complying with the monitoring provisions of 40 CFR §60.663(c) under Subpart NNN. Finally, EPA approves your request to comply with the recordkeeping requirements of 40 CFR §60.705(c)(4) in lieu of the recordkeeping requirements of Subpart NNN since those recordkeeping requirements correspond directly to those monitoring requirements to be implemented for the product stripper and naphtha stabilization distillation column vents under Subpart RRR.

Please be advised that you must provide a copy of the schematic required by Subpart RRR §60.705(s) in your initial report to the state agency and maintain a copy on site for the life of the system to ensure that the affected vent streams are being routed to appropriate control devices under this approval.

This approval is based upon the information submitted in your request for those units specified and identified within this letter. This approval is consistent with previous determinations made by EPA for Subpart NNN affected facilities. Enclosed, please find our detailed comparison of Subpart NNN and Subpart RRR requirements in relation to your request. If any new information becomes available or process unit operations are changed, this determination may become void and a new determination may be necessary. A copy of the approval will be sent to the New Mexico Environment Department Air Quality Bureau to attach to your state-issued new source review permit for federal enforceability. If you have any questions or concerns about this determination, please feel free to contact Mr. Justin Chen of my staff at (214) 665-2273.

Sincerely,

**STEVEN THOMPSON**

Digitally signed by STEVEN THOMPSON  
Date: 2022.08.30 12:08:35 -05'00'

Steve Thompson Chief,  
Air Enforcement Branch

Enclosure  
Ecc: Liz Kuehn (elizabeth.kuehn@state.nm.us)

**Enclosure**  
**Comparison of 40 CFR Subparts NNN and RRR**  
**For**  
**Flares and Boilers/Process Heaters**

The performance standards of §60.662 (Subpart NNN) and §60.702 (Subpart RRR) are established to minimize the emissions of volatile organic compounds (VOC) through the application of best demonstrated technology (BDT). Therefore, different technology controls have different testing, monitoring, and reporting requirements.

When a flare is used to seek compliance with either §60.662(b) or §60.702(b), both Subparts NNN and RRR require that the flare meet the requirements of §60.18 {see same requirement under testing at §60.664(d) and §60.704(c)}. Monitoring requirements are similar, except Subpart RRR includes monitoring flow diverted *from the flare to the atmosphere* via a bypass line {see §60.703 (b)(2)} while Subpart NNN requirements include monitoring vent streams *routed to each flare* prior to being combined with other gases {see §60.662 (b)(2)}. Therefore, Subpart RRR requires recording the flow rate more frequently (every 15 minutes) than Subpart NNN (every hour).

When a boiler or process heater is used to seek compliance with §60.662(a) and §60.702(a), the testing, monitoring, and recordkeeping requirements differ between Subparts NNN and RRR. EPA's rationale for waiving performance testing, temperature monitoring, and for refining the location and monitoring of flow indicators can be found on pages 45957 through 45959 in the Federal Register preamble to NSPS Subpart RRR (58 FR 45948 August 31, 1993. In general, Subpart RRR provides consideration of vent gases that are mixed with other gaseous streams and used as a *primary fuel* for the boiler(s) or process heater(s) whereas Subpart NNN does not address such primary fuel systems. Also, Subpart RRR addresses vent gas flows diverted *away from* a boiler(s) or process heater(s) via a bypass line(s) to the atmosphere whereas Subpart NNN merely addresses vent gases as *routed to* boilers or process heaters. For this reason, Subpart RRR requires recording the flow rate more frequently (every 15 minutes) in comparison to Subpart NNN (every hour). Specific citation comparisons are relevant as follows:

Specific to testing, both Subpart NNN §60.664(b)(5) and Subpart RRR §60.704(b)(5) waive the initial performance test requirement when a boiler or process heater with a design heat input capacity of 150 MBtu/hour or greater is used to comply with §60.662(a) and 60.702(a), respectively. Subpart RRR §60.704(b)(5) also waives the requirement for an initial performance test when a vent stream is *introduced with the primary fuel* into a boiler or process heater, regardless of heat input capacity.

Specific to monitoring, both Subpart NNN §60.663(c) and Subpart RRR §60.703(c) outline requirements for locating and monitoring vent gas flow indicators as well as monitoring firebox temperature. However, Subpart RRR §60.703(c)(1)(ii) waives the need for a flow indicator where bypass line valves to the atmosphere are secured in a closed position with a lock-and-key type configuration. Also, Subpart RRR

§60.703(c)(2) exempts the temperature monitoring requirement for any vent stream *introduced with the primary fuel* into a boiler or process heater.

Since Subpart RRR provides some relief in testing and monitoring requirements in comparison to Subpart NNN, as discussed above, an additional reporting requirement was deemed necessary. In order to ensure that the affected vent streams are being routed to appropriate control devices, Subpart RRR §60.705(s) requires that the facility maintain on file a schematic diagram of the affected vent streams, collection system(s), fuel systems, control devices, and bypass systems as part of the initial report submitted in accordance with §60.705(b). This additional reporting requirement (not required in Subpart NNN) is further discussed in the Federal Register preamble referenced above.