Petroleum Refinery Emissions Information Collection

General Instructions

Please provide the information requested in Components 1-3 and, if applicable, Component 4 for the facility listed in the Section 114 letter you received in the mail. If you received one Section 114 letter for multiple facilities, you must create a separate survey response for each facility.¹ The electronic files needed to complete the survey can be downloaded from the ICR website (https://refineryicr.rti.org).

Use the 2010 calendar year as the base year for all survey responses (*e.g.*, 2010 emissions inventory, 2010 throughput, 2010 equipment configurations) unless another year is specified in the instructions (*e.g.*, for existing emissions test data).

The following sections (Component 1) are to be completed by all facilities and returned to the address noted below by May 31, 2011:

- Part I General Facility Information: Provide information on the petroleum refinery at the facility level.
- Part II Process and Emissions Information: Provide detailed information on the process units and other emissions sources at the petroleum refinery.
- Part III Non-Routine Emissions: Provide information on non-routine emissions events during 2010 where the emissions exceeded normal emissions, normal controls were bypassed, or the effectiveness of the normal controls was reduced.
- Part IV Cost Data (Optional): Provide the age and cost to install and operate control equipment at the petroleum refinery.
- Part V Emissions Monitoring and Source Test Data: Provide results of all existing emissions data from tests or monitoring conducted on any of the processes or emission points included in Part II, Sections 2 through 16.

The following section (Component 2) is to be completed by all facilities and returned to the address noted below by June 30, 2011:

• Part VI – Emissions Inventory: Provide emissions estimates for the requested process units and other emissions sources at the petroleum refinery.

The following section (Component 3) is to be completed by all facilities and returned to the address noted below by August 31, 2011:

• Part VII – Distillation Feed Composition Analysis: Conduct an analysis of the composition of the feed to each distillation column at the refinery.

¹ For purposes of this information request, "facility" is defined as any stationary source or group of stationary sources located on one or more contiguous or adjacent properties in actual physical contact or separated solely by a public roadway or other public right-of-way and under common ownership or common control.

Component 4 (Part VIII), emissions testing, is to be completed by facilities with process units selected for testing. The Section 114 letter you received directs you to a website where you can find a list that indicates if a unit at your refinery has been selected for testing as well as detailed instructions on how the testing must be conducted. For units requiring stack tests, emissions tests (consisting of three runs per test method required) are to be conducted according to Part VIII for each unit. For fuel gas samples, triplicate grab samples are to be taken for each mix drum associated with a fuel gas system. Follow the instructions in Part VIII for sampling the wastewater treatment system. The results of the emissions tests and other requested analyses should be returned to EPA by August 31, 2011.

If you are unable to respond to an item exactly as requested, please explain why you cannot respond and/or provide any information you believe may be related. For example, if you have a special or unique type of process unit and the questions in the section related to that process unit are not relevant to your specific unit, please provide information that would help EPA classify your process unit and account for its existence and operation in potential future rulemaking.

Questions regarding this information request should be directed to Ms. Brenda Shine at (919) 541-3608 or shine.brenda@epa.gov.

Confidential Business Information (CBI)

If you believe that providing any specific information to us would reveal a trade secret, or would compromise confidential business information (CBI), please identify this information clearly in your response and submit your response as detailed in the next section. Also, please clearly label any flow diagrams or other attachments submitted with your survey that contain CBI. However, please do not label your entire response as CBI if only a portion includes trade secrets.

The EPA's procedures for handling CBI are described in the letter (and enclosures) accompanying this questionnaire. The EPA is likely to follow-up with a request for validation of CBI claims for facilities claiming large amounts of information as trade secret, especially information that is readily reported by other facilities without such claims. Any information EPA subsequently determines to constitute CBI or a trade secret under EPA's CBI regulations at 40 CFR part 2, subpart B, will be protected pursuant to those regulations and, for trade secrets, under 18 U.S.C. 1905. If no claim of confidentiality accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice pursuant to EPA regulations at 40 CFR 2.203. Because Clean Air Act (CAA) section 114(c) exempts emission data from claims of confidentiality, the emission data you provide will be made available to the public notwithstanding any claims of confidentiality.

How to Submit Your Survey Response

If your response to this information collection request includes data with a claim of CBI, you should follow the instructions in this section to ensure the protection of your data. Please note that if you submit CBI, you should separate your data into two packages, one containing your entire response, including any information claimed as CBI, and the other containing only

information that you do not claim as CBI (hereafter referred to as "non-CBI"). These two packages should be sent to EPA separately, using two different mailing addresses.

Separating CBI and Non-CBI

As you complete and review your survey response, identify the information you consider CBI. Clearly mark the CBI components as "Confidential" in your electronic survey response. If you are sending attachments, clearly mark the CBI portions of the diagrams/pages (*e.g.*, highlight or circle) as such.

Once you have marked the CBI, create a new survey response file that does not include this information. If you have attachments, remove the pages that contain CBI. The resulting files and attachments comprise your non-CBI survey response. Please check carefully to ensure that there is no CBI in these files. Send these files to EPA using one of the methods described under "Submitting Your Non-CBI Response."

Create a separate CD or DVD containing your entire survey response, including CBI. Include on the disk any pages of attachments to your survey response containing CBI, with the CBI portions of the diagrams/pages clearly marked (*e.g.*, highlighted or circled). Clearly mark the disk with the words "Confidential Business Information." Send only these CBI files under separate cover to the address provided under "Submitting CBI."

Submitting Your Non-CBI Response

For the non-CBI portions of your survey response, including non-CBI attachments (and for survey responses that are entirely non-CBI), use one of the following methods to submit your survey response to EPA:

- Upload your files to the ICR website. Detailed directions for uploading your files are provided on the ICR website (https://refineryicr.rti.org).
- E-mail an electronic copy of all requested files to <u>refineryicr@epa.gov</u>.
- Mail a CD or DVD containing an electronic copy of all requested files to the EPA address shown below. If no electronic copy is available, mail a hard copy of all requested files to the address shown below:

U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards
Sector Policies and Programs Division
U.S. EPA Mailroom (D205-01)
Attention: Brenda Shine, Petroleum Refinery Sector Lead
109 T.W. Alexander Drive
Research Triangle Park, NC 27711

EPA recommends sending your non-CBI files via Registered U.S. Mail using return receipt requested, Federal Express, or other method for which someone must provide a signature upon receipt.

Submitting CBI

Follow the instructions under "Separating CBI and Non-CBI" to create the portion of your survey response that contains CBI. Send only these CBI files under separate cover to:

U.S. Environmental Protection Agency Office of Air Quality Planning and Standards U.S. EPA Mailroom (C404-02) Attn: Mr. Roberto Morales, Document Control Officer 109 T.W. Alexander Drive Research Triangle Park, NC 27711

For security purposes, EPA highly recommends sending your confidential files to Mr. Morales via Registered U.S. Mail using return receipt requested, Federal Express, or other method for which someone must provide a signature upon receipt.

DO NOT ELECTRONICALLY TRANSMIT CONFIDENTIAL BUSINESS INFORMATION TO EPA. E-mail and facsimile are not secure forms of communication and should never be used to transmit CBI.