UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

Ms. Stacey Lynch
Chevron U.S.A. Products Company
324 W. El Segundo Boulevard
El Segundo, CA 90245

RE: SOCMI HON applicability to the Chevron El Segundo, CA Refinery and Richmond, CA Refinery

Dear Ms. Lynch:

Based upon the information that you provided Michael Stenburg, as well as your correspondence of April 10, 1996, we feel that the design and operation of the Chevron El Segundo, CA and Richmond, CA refineries is such that it would not subject either of these two refineries to the provisions of the HON.

The unit that is called the MTBE unit is probably misnomered because it is not producing MTBE as a primary product, and it is integral to the refining process, situated before the Alkylation unit. While there is MTBE being produced, it is within the process that creates the refined feedstock to the Alkylation unit. The unit does produce MTBE, but only as a secondary product to the upgraded feedstock.

Therefore, we have determined that this unit would be exempt from the SOCMI HON rule because it can be considered part of the refining process and would fall into the definition of a refining process per 40CFR, Subpart F, Section 63.101 of the HON. Section 63.100 (j) (2) of the HON, specifically exempts the refining processes from the provisions of Subparts F, G, and H of the HON.

You are correct in your assertion that the petroleum refining NESHAP will apply to these two California units, and Chevron should prepare accordingly.

With regard to your request to reclassify the Chevron Refinery in Pascagoula, MS, please be advised that such a request should be directed to our Region 4 office in Atlanta, GA which has responsibility for that jurisdiction. The contact in Atlanta is Phillip Barnett at (404) 347-3555, extension 4106.

Post-it® Fax Note 7671	Date 5/9/97	# of pages ▶ 4
To Jay Chen	From Stacey Lynch	
Co./Dept. SCAQMD	Co. Chevron	
Phone #	Phone (310) 615-5840	
Fax # 909-396-3341	Fax #	

Per your request!

I hope this letter responds to your request. If you have additional questions, please direct them to Michael Stenburg at (415) 744-1182.

Sincerely,

David P. Howekamp
Director
Air and Toxics Division