

## Holly Refinery Heavy Crude Processing Project Summary of Changes to Intent to Approve

A number of public comments were received on the Holly ITA IN101230041-12, during the public comment period that ended on January 28, 2013. Some of these comments would have resulted in changes to that ITA and they have been incorporated into this ITA. Those changes are as follows:

- 1) The originally proposed 2008 EPA Consent Decree emission reductions have been removed from the PSD and Major NSR applicability netting analysis
- 2) The proposed plant gas fired Unit 26H1 (poly gasoline unit heater) will now be an electric heater.
- 3) Change of baseline actual emissions 24-month periods for criteria pollutants
- 4) As a result of the changes stated above, the PSD, Major NSR, and offsetting applicability and netting analysis calculations have been adjusted. However, the project remains PSD for only CO and GHGs.
- 5) The permit caps for NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>10</sub> have been reduced.
- 6) BACT determinations have remained the same.

In addition to the above changes, in order to avoid a significant increase in PM and NO<sub>x</sub>, the following changes are being proposed:

- 1) Four (4) existing gas driven compressor engines (4K1A KVG Compressor West, 4K1B KVG Compressor East, 6K1 SVG Compressor East, and 6K2 Compressor West) will be replaced with four (4) electric compressor engines.
- 2) EPA published AP-42 PM emission factors have been replaced with EPA published PM National Emissions Inventory (NEI) emission factors. Verification stack testing requirements have been included.