

February 12, 2004

Mr. Dawson Lasseter, P.E., CPG
Chief Engineer
Air Quality Division
Oklahoma Department of Environmental Quality
Post Office Box 1677
Oklahoma City, OK 73101-1677

RE: Wynnewood Refining Company
Wynnewood Refinery
Garvin County, Oklahoma

Dear Mr. Lasseter:

This is in response to your letter of December 8, 2003, requesting our concurrence in a determination regarding the Wynnewood Refining Company, Wynnewood Refinery, Garvin County, Oklahoma. Your request concerns whether it is appropriate to consider the proposed replacement of the Fluid Catalytic Cracking Unit (FCCU) reactor cyclone system at the refinery as a "routine maintenance, repair and replacement" project. The project is designed to change the amount of feedstock which is cracked to gas, thereby recovering those hydrocarbons as liquids suitable for gasoline blending. It is represented that this project will not result in an increase in throughput, utilization, or capacity of the FCCU, nor will there be any increase in emissions from the FCCU itself. There will be a slight increase of 0.006 tons per year in emissions of volatile organic compounds due to the increased throughput in liquid storage tanks, with a negligible decrease for all other pollutants.

When assessing whether changes can be considered "routine" under Prevention of Significant Deterioration (PSD) regulations, permitting authorities consider the following factors: nature and extent, purpose, frequency, and cost. These factors, and their relationship to each other, are assessed to determine if a project is routine or not. In your letter, you document that the Oklahoma Department of Environmental Quality considered all these factors, and concluded that the project can be considered as routine within the meaning of Title 40, Code of Federal Regulations, 52.21(b)(2)(iii)(a) and, therefore, not require a PSD permit.

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Considering your request and the background information provided to us, the Environmental Protection Agency Region 6 concurs with you that the proposed replacement of the FCCU reactor cyclone system qualifies as a “routine maintenance, repair and replacement” project. Any action relative to this project must insure that the operational and emissions limitations as prescribed under permit 1998-117-TV are both federally and State enforceable.

We trust that our response to your request is helpful, and should you have any questions or require further assistance on this matter, please contact me at (214) 665-7250, or Rick Barrett of my staff at (214) 665-7227.

Sincerely yours,

David Neleigh
Chief
Air Permits Section