# **2006 Environmental Conference: Advance Program**

The Westin Riverwalk Hotel San Antonio, Texas





## **2006 Environmental Conference: Advance Program**

The NPRA Environmental Conference focuses on environmental regulatory and policy issues at the plant level. The sessions are designed to address the impacts of various environmental regulations on refineries and petrochemical plants and to provide compliance solutions and procedures for a facility. Approximately 300 environmental representatives from refinery and petrochemical plants and service organizations attend. It is an opportunity to network with peers, sharing similar problems and challenges in the refining and petrochemical industry.

#### **Panel Discussions**

Questions for the panel discussions represent real questions and problems that have been submitted by your peers. Panelists include representatives from the NPRA environmental committee, operating companies, service organizations and government agencies. Panelists bring prepared answers to the sessions and use their experience and knowledge to respond to questions raised by attendees.

#### Managing Facility Startup Shutdown, Maintenance, Malfunction and Upset (SSMMU) Activities Under the Clean Air Act

Managing environmental compliance for facility Startup Shutdown, Maintenance, Malfunction and Upset (SSMMU) activities has been a focal point of discussion within the industry for a number of years. Ambiguity in regulatory language and differences in agency interpretations has led to uncertainty in how SSMMU activities should be accounted and reported for various regulations promulgated under the Clean Air Act. This workshop will help clarify some of the uncertainty by providing information and interactive panel discussions through six modules that individually address compliance for SSMMU activities. Presenters and panel members will include representatives from consulting, industry, and state and federal agencies who are considered to be subject matter experts in the field. The workshop will benefit both refining and petrochemical staff responsible for managing environmental compliance for their facilities.

#### Conference Co-Chairs:

Paul Young, Ergon Inc.
Chris Swanberg, Coffeyville Resources LLC

### We would like to thank our 2006 Environmental Conference Sponsors:

Providence Engineering RMT The RETEC Group

#### **Schedule at a Glance**

#### Sunday, September 17, 2006

10:30 am – 5:00 pm Registration / Badge Pick-up

12:30 pm – 5:00 pm Workshop:

Managing Facility Startup Shutdown, Maintenance, Malfunction and Upset Activities Under the Clean Air Act

Coordinated by Sage Environmental Consulting

See registration form for fees.

You must be signed up for the conference to attend the workshop.

#### Monday, September 18, 2006

7:00 am – 5:30 pm Registration / Badge Pick-up

8:00 am – 8:45 am Keynote Session

8:45 am – 10:00 pm Greenhouse Gases

10:00 am - 10:30 am Coffee Break

10:30 am – 12:00 pm Remediation and Water Issues

12:00 pm – 1:30 pm Lunch

1:30 pm – 3:30 pm Fugitive Emissions, Flares, and Fence Line Monitoring

3:30 pm – 5:30 pm Technical Poster Session and Reception

#### Tuesday, September 19, 2006

7:00 am – 3:00 pm Registration / Badge Pick-up

8:00 am - 10:00 am Compliance Assurance

10:00 am - 10:30 am Coffee Break

10:30 am – 12:00 pm Compliance Assurance

12:00 pm – 1:30 pm Lunch

1:30 pm – 3:00 pm Panel Discussion:

Newsreel: Regulatory & Legislative Update

12:30 pm - 5:00 pm

#### Workshop

Managing Facility Startup Shutdown, Maintenance,
Malfunction and Upset (SSMMU) Activities Under the Clean Air Act
Coordinated by Sage Environmental Consulting

You must be signed up for the conference to attend the workshop.

### Module 1 SSM Plan Strategies

- SOPs referencing
- Checklist use
- Plan structure
- Recordkeeping
- Event management

Moderator: *Brett Kriley*, Sage Environmental Consulting

Representative, Total Petrochemicals, USA

# Panel Discussion: Module 2 SSM Refinery MACT I /II, HON/MON MACT

- Tanks
- Flares
- SRU
- FCCU
- Process vents

Moderator: Kelly Bradberry, Sage Environmental Consulting Representative, ConocoPhillips Representative, LaDEQ Bob Lucas, EPA OAQPS (Invited) Rob Ferry, The TGB Partnership

### Panel Discussion: *Module 3*

#### **SSMU Benzene NESHAP Issues**

- Rule interpretations
- Waste accounting (2 Mg vs. 6 Mg Option)
- Control device maintenance

Moderators: Larry Darcy, Darrell Bruckert, Sage Environmental Consulting Representative, BP Representative, SCAQD Ken Garing, EPA NEIC

Brad Raffle, Baker Botts, LLP (Invited)

## Panel Discussion: Module 4 SSMM NSPS A & J Issues

- Rule interpretations
- CEMS reporting during SSMM
- Flares
- SRU / Sulfur Pit

Moderator: Mike Hopperton, Sage Environmental Consulting Representative, Exxon Mobil Corporation Representative, TCEQ Patrick McCoy, EPA Region V (Invited) Jim Jahnke, Phd, Source Technology Associates (Invited)

#### Panel Discussion: Module 5 SSM Permitting

- NSR Legalities netting, offsets,
   SIP caps, NAAQS, enforcement, etc.
- Permitting MSS and QUAN;
   Texas developments
- Flex PAL advantages and disadvantages

Moderator: *Jim Myers*, Sage Environmental Consulting

Representative, Exxon Mobil Corporation Representative, TCEQ Representative, EPA Region VI Matt Kuryla, ESQ, Baker Botts, LLP

### Module 6 SSM Reporting

- Immediate vs. periodic reporting
- State overlap
- Title V deviations
- EPCRA\CERCLA overlap

Moderator: Jamie Mann, Sage
Environmental Consulting
Percentative Coffeedille Resources

Representative, Coffeyville Resources LLC

8:00 am – 8:45 am

8:45 am – 10:00 am

#### **Keynote Address**

GHG: Coming Soon to a Theater Near You Mindy Lubber, Executive Director, CERES

#### **Green House Gases**

Geoff Swett, ARCADIS

Voluntary Actions to Address Climate Change: A Survey of Strategies and Activities by US Refiners and Petrochemical Producers Ron Crum, URS Implementing Climate Change
Policy in the Refining Industry –
Industry Specific Challenges and
Lessons Learned

Julie Chiaravalli, David Wolfe, Trihydro Corporation

Cost Effective Actions to Mitigate the Impact of a Climate Change Policy

Terry Shires, URS

**Question & Answer Session** 

10:30 am - 12:00 pm

#### **Remediation and Water Issues**

Increasing Water Scarcity
Raising Refineries – Interests in
Water Recycle and Reuse

Enrique Falcon, Michael Romano, Earth Tech / Tyco Infrastructure

#### Managing the Business of Environmental Remediation

Marc Ferries, El Paso Corporation Ken Tyrrel, URS Corp

### Implementation of MACT Rulemakings

Lyn Holmes, Roger Rinas, Valero Energy Corporation Henry Goyette, ERM

### Permitting New or Expanded Discharges in Impaired Waters

Mike Hansel, Barr Engineering Company

12:00 pm - 1:30 pm

Lunch with Speaker

1:30 pm - 3:30 pm

### Fugitive Emission, Flares, and Fence Line Monitoring

### Effective Flare Management in Refineries

Mudumbai Venkatesh, ENSR Corporation

#### Reducing Emissions From Plant Flares

Meg Healy, Robert Levy, Lucy Randel, Donald Weaver, Industry Professionals for Clean Air

#### Designing Emission Testing Programs to Support Refinery MACT and EPA Consent Decree Implementation

Gary Lloyd, Jeffrey O'Neill, Weston Solutions Inc.

#### **Smart LDAR - Writing the Rules**

Robert Ferry, The TGB Partnership

### The Third Generation LDAR - Lower Fugitive Emissions at a Lower Cost

Nimish Katwala, Liming Zhou, Kevin Calhoun, Yousheng Zeng, Providence Engineering and Environmental Group LLC

#### Continuous Fenceline Air Monitoring for Benzene Using an Automated-Gas Chromatograph

Brian Cochran, Scott Jenkins, URS Corporation

#### SMART LDAR

Ken Garing, EPA NEIC (Invited)

3:30 pm - 5:00 pm

#### **Poster Session**

#### Managing Continuous Emissions Monitoring Systems

Jena Golightly, ConocoPhillips Lisa Cruz, T3, Inc.

### Using Asset Recovery to Lower Costs and Reduce Liabilities

J. Mitchum, URS Corp. Cleveland Wrecking Company

#### Achieving Increased Consistency through Implementation of Multi-Site Environmental Information Management System

Gary Hart, Shell Oil Company
David Cox, Rebecca Morris, ESP
(Environmental Software Providers)

#### Field Data Collection Using Handheld Computers

Brian Powers, National Cooperative Refinery Association Jess Askey, Mark Schoenheider, Trihydro Corporation

#### DynaWave Wet Gas Scrubbing: A New Alternative for Claus Unit Tail Gas Treating

Cristina Kulczycki, Steve Meyer, MECS, Inc.

#### Optimizing the Performance of Ultra-Low-Emission Burners in Refinery and Chemical Plant Furnaces

Charles Benson, Mark Bury, Roberto Pellizzari, ENVIRON International Corporation

#### Use of Landfill Gas (LFG) at Cytec Industries Inc. Fortier Manufacturing Complex

Julie Roussel, Dave Vaishnav, Cytec Industries Inc.

#### **Unresolved BWON Issues**

Bruce Douglas, Brown and Caldwell

#### Implementation of a Real-Time Environmental Data Management System to Ensure HRVOC Program Compliance

Kelly Coppola, BP Products North America, Inc. Jane Buchanan, Mustang Engineering, LP

### Port Hawsbury Bioremediation and Secondary Containment Upgrades

Michael Romano, Don Shosky Jr., Earth Tech, Inc.

#### Sediment Remedial Approach – Monitored Natural Recovery

Tammy Brendel, Amber Murray, Christopher Pearson, William Solberg, The RETEC Group, Inc.

#### Use and Calibration of the API Mobility Model to Predict LNAPL Recovery – A Case Study for a Former Midwestern Refinery

Christopher Pearson, P.E., The RETEC Group, Inc.

#### National Partnership for Environmental Priorities

Ryan Rosserm, EPA Region 6

8:00 am - 12:00 pm

#### **Compliance Assurance**

### DOT Applicability – Are You Covered?

June Coover, John McCabe, The RETEC Group, Inc.

#### An Insightful NSR Case Study

Luis Comas, Sunoco Environmental Services Albert Hatto, ERM

## The Invisible Business Risks in the Refinery Fuels Laboratory: It doesn't have to be Fraud to be Frightening

John Huntington, Gateway Enterprises

### Regulatory Reporting Requirements for the Petroleum Industry

Terry Cirbo, Thomas Nelson, Anita Firestine, Ashok Patel, URS Corporation

#### Secrets to Meaningful, Sustainable and Efficient Regulatory Task Development for Compliance Certification

Alan Savage, Tesoro Refining and Marketing Company John Beath, Lynn McGuire, ERM Challenges in Dealing with Regional Haze for BART and New Source Permitting

David Heinold, Robert Paine, ENSR

#### Looking Down the Road: Implications of EPA's New AERMOD Model for Refineries

Bob Muche, Sunoco, Inc. Mark Garrison, ERM

#### Strategic Compliance Planning in Eight-Hour Ozone Nonattainment Areas

Sharon Jones, CDM

### Controlling NOX on Refinery Heaters Using CO-Based Control Technology

Robert Bambeck, Bambeck Systems Inc. Representative, Placid Refining Company

#### The New PM NAAQS: Its Practical Implications, and a Viewpoint on its Scientific Basis

Yousheng Zeng, Providence Engineering and Environmental Group LLC

12:00 pm - 1:30 pm

Lunch with Speaker

1:30 pm - 3:00 pm

#### **Panel Discussion:**

Newsreel: Regulatory & Legislative Update

#### 1. Conference Registration and Tickets

Click here to register or complete the enclosed registration form. Registration includes admission to the General Sessions, the Reception and Poster Session on Monday, and luncheons Monday and Tuesday. Registration for the Managing Facility Startup Shutdown, Maintenance, Malfunction and Upset (SSMMU) Activities Under the Clean Air Act Workshop is a separate fee. Refer to the registration form for conference and workshop fees. You'll save \$100 off full conference registration if you register by August 16!

#### 2. Hotel Reservations

Reserve your hotel on-line when you register at www.npra.org and receive an immediate acknowledgement of your reservation. Or, fill in the appropriate space on the enclosed registration form. Hotel reservation requests will be processed in the order received by the NPRA. Get immediate acknowledgement on-line but allow 3 weeks if submitted to NPRA. The hotel requires a deposit equal to one night room rental plus tax to guarantee your room. This is refundable if notice is received at least seventy-two (72) hours prior to your arrival and a cancellation number is obtained. The credit card will be charged the first nights deposit as soon as NPRA turns the rooming list over to the Westin in mid-August.

August 16, 2006, is the cut-off date for making hotel reservations, cancellations or substitutions through NPRA or on-line. Beginning August 21, reservations, substitutions, or cancellations must be made through the hotel directly.

#### 3. Spouse Registration

For just \$50, your spouse can join you at the Welcome Reception as well as the included business sessions.

#### 4. Payment

Pay by credit card, check or wire transfer. If you register on-line but wish to pay by check or wire please be sure to include your system ID# and name with payment.

#### 5. Confirmation

Your registration will be confirmed via e-mail if you provided us your email address. Otherwise, your confirmation will be sent via U.S. mail.

#### Cancellation Policy:

Registration substitution/cancellations may be faxed to 202.835.0467 or e-mailed to ENV@npra.org. Substitute conference registrations may be made in advance or on arrival with no penalty. Cancellations may be made by August 16, 2006 with no penalty. Written cancellations postmarked, faxed, or emailed between August 17 and September 1, 2006 will receive a refund of fees, less a \$50 processing fee. No refunds after September 1, 2006. No telephone cancellations.

#### Fee Policy:

Eligibility for member rates is based on membership information currently on file with NPRA. If your company is not currently a member, the non-member fees will be charged to your credit card.

#### Registration Policy:

Those who are present at the site of an NPRA meeting and/or occupy a hotel room in the NPRA room block to conduct business with industry personnel gathered for that meeting are expected to register for that meeting and pay the registration fee, whether or not they attend a specific function.

#### Spouse / Guest Policy:

A guest is a spouse/significant other, friend or an adult child (18 years old or older) who is not in an industry-related occupation. A co-worker, an associate or spouse who works within the industry may not use the Spouse/Guest Registration category.

Step 1: Attendee Profile Please fill out completely. Badges will be printed from this information.  Name  Title			Step 3: Payment Information  Payments to NPRA are not deductible as charitable contributions for federal income tax purposes. However, they may be deductible under other provisions of the Internal Revenue Code  □ Check Enclosed (US Dollars only)  □ Bank Transfer: Sun Trust Banks, Inc., Washington, DC Routing #061000104 • Acct #206887906			
			Company			<ul><li>□ Credit Card</li><li>□ VISA</li></ul>
Address						
Address			Credit Card Number			
City	State Z	Cip Country	Exp. Date			
Phone (Area/Country/City Code)	Fax (Area/Country/C	City Code)	Name of person on card (F	Please print)		
E-mail  This is not a permanent address change.			Signature (Required; authorizing charge & acknowledging cancellation/refund, fee, registration, & spouse policies)  Step 4: Hotel Reservations  Hotel Reservation requests must be accompanied by paid conference registration to be processed. Room Rate is \$189 single/double occupancy at the Westin Riverwalk Hotel,			
						Spouse/Guest Name* (if attending)
☐ Check here if you req Please attach a descr						420 Market Street,
Step 2: Meeting Registration			Arrival Date			
	\$ 400 \$ \$ 795 \$	After August 16 5 500 6 895 6 50	Departure Date  If no dates are indicated, we will assign arrival Sunday, September 17 and departure Tuesday, September 19.			
The SSMMU Workshop September 17			Room Type:   One Bed  Two Beds  Number of People in Room:			
(Must be registered for □ Member  \$ □ Non-Member  \$	•	end) 5 125 6 195	Special Requests:	<ul><li>☐ Smoking</li><li>☐ Disability</li></ul>	<ul><li>□ Non-smoking</li><li>□ Other</li></ul>	
Total Amount Due			Room Guarantee:	<ul><li>□ AMEX</li><li>□ MasterCard</li><li>□ Diners</li></ul>	□ VISA □ Discover	
Name of Member Company  Not sure if your company is a meml	per? Click here.		Credit Card Number			
			Exp. Date			
Register by Fax: Return your form by fax with credit card information to 202.835.0467	NPRA 1899 L Street, Suite 1000	1899 L Street, NW Suite 1000		Signature  Register on-line to receive immediate acknowledgement of hotel. August 16th is the final cut-off date to reserve a room.  Contact the hotel directly with changes or cancellations		
Washington, DC 20036			beginning August 21, 2006.			