

Dennis Roberts

From: Jerry Frost [jfrost@kernoil.com]
Sent: Tuesday, March 02, 2010 2:52 PM
To: Dennis Roberts
Subject: Boiler BPS - Comments

Dennis

With regard to the Boiler BPS under consideration, Kern Oil & Refining Co. requests a category specific to refinery operations fired exclusively on refinery fuel gas. This type of category should be considered for process heaters in refineries as well as for boilers. The District has recognized the uniqueness of refinery fuel gas as compared to PUC gas in previous prohibitory rules such as 4306 and 4320. If refineries did not capture, condition and recycle refinery fuel gas to fire heaters and boilers, the off-gas generated from the refinery process would then need to be flared, which would be counter-productive to the reduction of criteria and GHG emissions.

In addition, most refinery heaters are natural draft. Natural draft heaters are more energy efficient than mechanical draft heaters since natural draft heaters do not require electrical energy off the grid to power the mechanical draft motors.

There are also CO monitoring and control systems such as the Bambeck System (see link below) that increases heater/boiler efficiency and fuel efficiency by applying automatic damper control to regulate flue gas oxygen content which increases heater/boiler fuel efficiencies.

<http://www.bambecksystems.com/>

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