



Kern Oil & Refining Co.

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Mr. Jon Adam
Compliance Manager
SJVAPCD
1990 E. Gettysburg Avenue
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**Subject: Comment for COM #1151 – Volatile Organic Compound Analyzers
Policy Guidelines for the Use of District VOC Analyzers**

Dear Mr. Adams:

Kern Oil & Refining Co. (Kern) is submitting the following comments on the Subject Draft Compliance Policy.

In the Policy Section entitled "EPA Method 21 and Analyzer Usage," paragraph three, the policy states, *"Duplication is not required for a violation; the inspector shall take the highest reading seen for a given component."* Kern would like to point out that this method of taking the highest reading is inconsistent with standards cited in the California Environmental Protection Agency (CalEPA)/California Air Resources Board (CARB), Compliance Division, "Petroleum Refining Training Manual", dated July 1994, Section 301 – Fugitive Emissions, page 38, which specifies that *"the concentration is measured by finding the highest sustainable concentration of the leak... read the maximum concentration that you can maintain for several seconds, not just a peak of a spike."* In addition, Method 21-Determination of VOC Compound Leaks, Section 8.3.1 requires the following; *"Leave the probe inlet at this maximum reading location for approximately two times the instrument response time."*

Based on the aforementioned, Kern recommends the following revisions:

Delete the last two sentences in the third paragraph, page 3 of Section: EPA Method 21 and Analyzer Usage, in the Draft COM #1151 Policy, which reads; *"Duplication is not required for a violation; the inspector shall take the highest reading seen for a given component. It is important to keep the probe at a potential leak source long enough to ensure the maximum reading is attained."*

Insert the following language at the end of the third paragraph, page 3 of Section: EPA Method 21 and Analyzer Usage, in the Draft COM #1151 Policy, as follows; *"To determine the maximum concentration of a potential leak, leave the probe inlet at the maximum reading location for approximately two times the instrument response time."*

In the draft COM #1151 Policy, Section Calibration Requirements, page 3, paragraph 5, the District specifies that; *"if the source asks us to demonstrate the accuracy of our instruments we will do so..."* The District did not include language for the situation where the instrument is demonstrated to not be in calibration.

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Kern recommends the following language be inserted into the draft COM #1151 Policy, Section Calibration Requirements, page 3, paragraph 5:

"If the District instrument is demonstrated to not be accurate, the inspector shall discontinue the inspection until a new instrument can be utilized or the instrument is recalibrated and demonstrated to be accurate."

Kern would also like to recommend the addition of a paragraph specifying:

"at the request of the operator, the District will demonstrate instrument accuracy prior to beginning the inspection."

Thank you for your consideration. If you have any questions, please call me at (661) 845-0761.

Sincerely,

A handwritten signature in black ink, appearing to read "Patty Lee Kusek". The signature is fluid and cursive, with the first name "Patty" being the most prominent.

Patty Lee Kusek
Environmental Coordinator