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*Comment Received From: Tiffany Rboerts
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WSPA Comment Letter

Attached please find our comments - thank you.

Additional submitted attachment is included below.



Submitted via docket:

<https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=19-BSTD-03>

November 10, 2020

Payam Bozorgchami, P.E.
Project Manager, 2022 Building Standards
California Energy Commission

Mr. Bozorgchami,

The Western States Petroleum Association (WSPA) appreciates the opportunity to make comments to the California Energy Commission's (CEC) workshop for the 2022 Pre-Rulemaking for Building Energy Efficiency Standards. WSPA is a trade association whose members are regulated under California's Cap and Trade program which requires for every tonne of Co2e produced over 25,000 MT per year the party producing the emissions enter into the Cap and Trade program and purchase allowances to cover those emissions. The revenue from the sale of those allowances are then appropriated by the California Legislature to various programs to further reduce emissions. WSPA members take pride in energy efficiency and believe energy efficiency is a foundational part of cost effectively reducing greenhouse gas emissions.

First, WSPA would like to encourage the CEC and its partners the "2022 Title 24 Utility-Sponsored Stakeholder Group" to ensure prior to beginning any future process to include all stakeholders from the beginning. WSPA and its membership learned about this process through third party interactions, not from the agency or the stakeholder group. This lack of communication is concerning given the applicability of the code changes to WSPA members facilities all while currently being regulated by California's greenhouse gas emission programs.

Steam Trap Failure

As mentioned above, our members pride themselves in being energy efficient, there is no set standard, but each has a program in place to monitor and replace steam traps and associated equipment.

To answer the questions posed during the workshop, WSPA suggests an industry wide survey be completed that is constructed in a manner that protects individual company, proprietary, competitively sensitive information.. However, WSPA suggests the average time between failure and finding the failure, is 3 to 6 months. For the number of steam trap failures assumed to fail open, again, this would require an industry survey, but 50 percent is probably more appropriate.



Additionally, it is important to note that refinery steam systems are more complex than the “Steam System Schematic” indicated in Figure 1 of the Case Report. Typically, refineries have multiple different steam systems which operate at different pressures and are interconnected specifically for the purpose of minimizing the energy losses. It is common that when a steam trap in a higher-pressure system fails that it the steam does not go directly to the condensate system thus wasting energy and instead is routed to a to lower pressure steam systems for use in another process. This means that the wasted energy and associated greenhouse gas emissions with many of the steam traps in a refinery setting would be overestimated by the methodology used in the current Case Report, and the cost-effectiveness of putting a monitoring system on EVERY steam trap in a refinery is significantly reduced.

WSPA looks forward to engaging further with the CEC on these issues.

Proposed Code

The proposed **120.6(j) Mandatory Requirements for Steam Traps** states:

“Steam traps in new industrial facilities and steam traps serving new industrial process equipment in existing industrial facilities where the installed steam trap operating pressure is greater than 15 psig and the total combined connected boiler input rating is greater than 5 Million Btu/hr, the steam traps shall conform to the following:”

It is unclear what applicability this language has on existing facilities. Therefore, we request that the CEC clarify or provide specific examples in how it will apply. For example, the Building Code should be clear this requirement does not apply to the replacement of existing industrial process even if the replacement equipment is new. This situation may occur if a turbine pump or piece of operating equipment is retired and an operator installs new replacement equipment requiring steam lines and thus steam traps.

Thank you for consideration of our comments. We would welcome the opportunity to discuss these ideas in more detail with you. If you have any immediate questions, please feel free to contact me at troberts@wspa.org.

Sincerely,

A handwritten signature in blue ink that reads "Tiffany K. Roberts".

Tiffany K. Roberts,
Vice President, Regulatory Affairs
Western States Petroleum Association