



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 19 2014

REPLY TO THE ATTENTION OF

Ms. Kristin Hart
Chief
Permits and Stationary Source Modeling Section
Bureau of Air Management
Wisconsin Department of Natural Resources
PO Box 7921
Madison, Wisconsin 53707-7921

Dear Ms. Hart:

The U.S. Environmental Protection Agency has reviewed the draft air pollution control construction permit, permit number 13-DCF-129, for Enbridge Energy Co., located in Superior, Wisconsin. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and the permit record provides adequate support for the decision, EPA has the following comments:

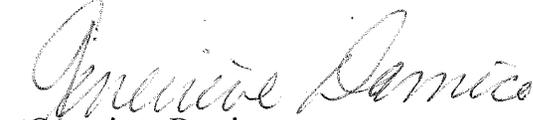
- 1.) Pages 3 through 8 of the preliminary determination discuss several projects that are currently in progress or are may be in planning. According to the table on page 7 of the preliminary determination, the inbound capacity of pipeline 67 and outbound capacity of pipeline 61 increased as a result of a project authorized in 2012. The current draft permit, once issued as a final permit, will authorize the construction of three additional storage tanks. This will facilitate an additional increase in the outbound capacity of pipeline 61. Since both projects will yield an increase to the outbound capacity of pipeline 61 and affects the throughput of the facility as a whole, it appears that the projects in the current draft construction permit 13-DCF-129 and the previously-issued construction permit 12-DCF-205 may be related and could potentially be considered the same project for permitting purposes. Please evaluate whether the projects authorized in construction permit 12-DCF-205 and the current draft permit 13-DCF-129 are related and should be aggregated or otherwise be considered as a continuation of the same project for construction permitting purposes.
- 2.) Condition I.ZZZ.1.a contains synthetic minor Hazardous Air Pollutant (HAP) emission limits that are intended to limit the potential to emit HAPs, thereby avoiding HAP major source requirements. The permit does not appear to specify the method or methods to calculate or otherwise determine single and total HAP emissions, with the exception of hexane. Although condition I.ZZZ.1.b generally requires HAP emissions to be determined either analytically or using published literature in combination with good engineering practices, the permit should identify the specific methods to determine single and total HAP emissions. Further, condition I.ZZZ.1.c does not appear to require the

facility to record the amount of HAPs emitted by the facility. For hexane, actual and potential emissions are to be calculated by March 15th of each year as required in condition I.ZZZ.1.b(3). However, it is unclear how calculating hexane emissions only once per year is sufficient to ensure compliance with the monthly hexane limit. Please clarify how HAP emissions are determined. Please also specify any additional monitoring and recordkeeping necessary to ensure both compliance with and practical enforceability of the synthetic minor HAP limits.

- 3.) Condition I.ZZZ.2.a(4)(t) requires tank 23 to include assorted equipment as noted in the application. The equipment is required to restrict the emission of HAPs, thereby avoiding major source HAP requirements. Tank 23's required equipment should be identified and included in the permit. Identification and inclusion of the required equipment in the permit as opposed to referring to the equipment listed in the permit application will both reduce ambiguity and enhance enforceability of the permit condition.
- 4.) According to condition I.ZZZ.7.a(2), the authorization to construct tanks T43-T45 under this permit will expire 36 months after the issuance of the permit. Please provide further justification within the permit record explaining why an initial 36-month construction authorization has been granted for this project as opposed to an initial 18-month construction authorization.
- 5.) Footnotes included throughout the permit are intended to clarify draft permit terms and conditions. The permit is unclear whether these footnotes are additional federally-enforceable permit conditions or if the footnotes are only explanatory in nature. Please explain in the permit record whether the footnotes are intended to be federally-enforceable permit conditions or if they are only intended to clarify a permit condition. If they are intended only to clarify a permit condition, then please consider adding the clarification to the permit condition instead of including the explanation as a footnote in the permit.
- 6.) The Best Available Control Technology (BACT) analysis concluded that the installation of a mechanical shoe primary seal for tanks T43-T45 constitutes BACT. Condition I.C'.1.a(4)(a) of the draft permit includes this requirement for tanks T43-T45. However, in the same permit, condition I.C'.1.a(1)(a)1.a also allows for the primary seal to be either a mechanical shoe seal or a liquid-mounted seal. Although BACT was determined to include mechanical shoe primary seals for tanks T43-T45, the permit may be interpreted to allow for a liquid-mounted seal for these tanks since conditions in I.C' apply generally to crude oil storage tanks, including tanks T43-T45. Please clarify these permit conditions to address the ambiguity in the primary seal requirements.

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Michael Langman, of my staff, at (312) 886-6867.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico

Chief

Air Permits Section