



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

OCT 09 2012

REPLY TO THE ATTENTION OF:

Edwin C. Bakowski, P.E.
Bureau of Air
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

Dear Mr. Bakowski:

The U.S. Environmental Protection Agency has reviewed the draft Renewal Clean Air Act Permit Program (CAAPP) permit (Permit No. 02120051) prepared by the Illinois Environmental Protection Agency (Illinois EPA) for Natural Gas Pipeline Company of America, located at 23725 West County Farm, R.R. #8, Shorewood, Illinois. EPA has the following comments on the draft CAAPP permit:

1. It is not clear whether or not 40 C.F.R. Part 63, subpart DDDDD applies to the source. The Statement of Basis states that the source is subject to both 40 C.F.R. Part 60, subpart GG and 40 C.F.R. Part 63, subpart DDDDD. Statement of Basis at 7. However, the draft CAAPP permit explains that the source is not subject to 40 C.F.R. Part 63, subpart DDDDD "because the source is not a major source for [Hazardous Air Pollutants]." Permit at 29. Please clarify Illinois EPA's determination regarding the applicability of 40 C.F.R. Part 63, subpart DDDDD to the source.
2. Please clarify how the source will demonstrate compliance with the Particulate Matter (PM) emission limits in Condition 4.1.2(b)(i)(A). Condition 4.1.2(b)(i)(A)(I) limits PM emissions from the turbines (combined) to 5.18 tons per year (tpy). Condition 4.1.2(b)(i)(A)(II) limits PM emissions from the larger turbine (ENG-10) to 0.64 pounds per hour (lb/hr). Condition 4.1.2(b)(i)(A)(III) limits PM emissions from each smaller turbine (ENG-1 through ENG-9) to 0.121 lb/hr. Pursuant to Condition 4.1.2(b)(ii)(A), it appears that the source will demonstrate compliance with the above emission limits by complying with the operational and production restrictions in Condition 4.1.2(g) and the work practice requirement in Condition 4.1.2(h). However, neither the permit nor the Statement of Basis explains how the source will calculate emissions for purposes of demonstrating compliance with the numerical PM emission limits in Condition 4.1.2(b)(i)(A). Please explain in the permit record how compliance with the work practice and operational restrictions in the permit will assure compliance with the numerical PM emissions limits.
3. The permit does not specify how the source will demonstrate compliance with the Volatile Organic Material (VOM) and the Carbon Monoxide (CO) emission limits in

conditions 4.1.2(d)(i) and 4.1.2(e)(ii)(B), respectively. Pursuant to conditions 4.1.2(d)(ii) and 4.1.2(e)(ii), it appears that the source will demonstrate compliance with the VOM and CO emission limits by complying with the operational and production restrictions in Condition 4.1.2(g) and the work practice requirement in Condition 4.1.2(h), and through emissions testing in accordance with Condition 4.1.4(a)(i)(B). However, the testing provision in Condition 4.1.4(a)(i)(B) only requires testing of "substitute" turbines. *See* Permit at 26 and Statement of Basis at 15. It is not clear how the source will demonstrate compliance with the numerical VOM limits in Condition 4.1.2(d)(i), or the CO limits in Condition 4.1.2(e)(i), which apply to each turbine operated at the source. Neither the permit nor the Statement of Basis explains why emissions testing is only required for "substitute" turbines and not other turbines. How will the source calculate emissions for demonstrating compliance with the numerical VOM and CO emission limits in conditions 4.1.2(d)(i) and 4.1.2(e)(i)?

4. Please clarify how the source will demonstrate compliance with the Nitrogen Oxides (NO_x) emission limits in conditions 4.1.2(f)(i)(B) and (C). It appears from Condition 4.1.2(f)(ii)(C) that the source will annually monitor NO_x concentrations from the larger turbine (ENG-10) as specified in conditions 4.1.2(f)(ii)(C)(I) and (II). Performance tests will also be required for the larger turbine at a frequency of once every five years pursuant to Condition 4.1.2(f)(ii)(G). Presumably, the annual NO_x monitoring and performance tests for the larger turbine will provide emissions data to be used for monitoring compliance with the larger turbine's NO_x limits. How will compliance be monitored for the smaller turbines?
5. Some cited conditions appear to be missing from the draft CAAPP permit. Conditions 4.2.5(a)(i)(A)(I) and Condition 4.1.2(d)(i)(B)(IV) reference conditions 4.2.2(c)(i), and 4.2.2(d)(i) of the draft CAAPP permit but these referenced conditions appear to be missing from the version of the draft CAAPP permit reviewed by EPA. *See*, also, Statement of Basis at 16 (referring to Condition 4.2.2(c)).

We provide these comments to help ensure that the project meets all federal requirements, that the permit provides all necessary information so that it is readily accessible to the public, and that the record provides adequate support for the permit decision. We look forward to working with you to address all of our comments. If you have any questions, please feel free to contact me at (312) 353-4761 or David Ogulei, of my staff, at (312) 353-0987.

Sincerely,


Genevieve Damico
Chief
Air Permits Section