



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

APR 27 2011

REPLY TO THE ATTENTION OF:  
AR-18J

Ed Bakowski  
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 the following comments on the Illinois Environmental Protection Agency's (IEPA) draft renewal of the Clean Air Act Permit (CAAP) for BP Pipelines (North America), Inc. – Manhattan Station, Pipe Line Breakout Station (BP) (application number 95090005).

1. The draft permit contains anticipated operating scenarios as provided for in 39.5(7)(l). However, the permit does not meet the requirements to maintain a log of the scenario under which it operating (39.5(7)(l)(i)(A)) and require monitoring, recordkeeping, and reporting (39.5(7)(l)(i)). IEPA must ensure that the permit contain these requirements for each anticipated operating scenario in permit conditions 5.11, 7.1.11, 7.2.11, 7.3.11, 7.4.11, and 7.5.11,
2. The permit provides for the use of emission factors as a method to determine emissions in 7.1.9(c)(ii)(C), 7.2.9(b)(i)(C), 7.3.9(c)(i)(C), 7.4.9(c)(i)(C), and 7.5.9(b)(i)(D). It is not clear whether the emission factors used by IEPA are indicative of the emissions at BP's facility. With a few exceptions, the EPA does not recommend the use of emission factors to develop source-specific permit limits or to determine compliance with permit requirements. *In the Matter of Tesoro Refining and Marketing Co, Martinez, California Facility*, Petition Number IX-2004-6 (March 15, 2005) at 32. IEPA either must justify in the record why these emission factors are representative of BP's operations (i.e., representative to yield reliable data from the relevant time period representative of the sources compliance), and provide sufficient evidence to demonstrate that the emissions will not vary by a degree that would cause an exceedance of the standards, or IEPA must determine and adequately support another mechanism to assure compliance with the applicable emission limits.
3. There are no Title I conditions in section 7.4. Given the dates of construction listed for the affected storage tanks in section 7.4, it is likely these units did obtain construction permits containing Title I applicable requirements. IEPA must include all applicable requirements in the CAAP. (39.5(7)(a))

The remaining comments are enclosed.

Thank you for your consideration. If you have any questions or concerns regarding these comments, please contact Genevieve Damico, of my staff, at (312) 353-4761.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela Blakley for". The signature is fluid and cursive, with a large initial "P" and a long horizontal stroke at the end.

Pamela Blakley,  
Chief  
Air Permits Section

Enclosures

**Additional Comments for BP Pipelines (North America), Inc. – Manhattan Station, Pipe Line Breakout Station (application number 95090005)**

1. The following permit terms are missing an origin and authority:
  - a. 5.7.3
  - b. 5.9.3
  - c. 5.9.7
  - d. 5.9.8
  - e. 7.1.10(b)
  - f. 7.1.11
  - g. 7.7.8
  - h. 7.8.5(c)
  - i. 7.8.5(d)
2. Condition 7.6.5 requires the permittee to “periodically monitor.” This term is practicably unenforceable. IEPA must define the minimum frequency the permittee must monitor.
3. Conditions 7.7.8 and 7.8.8 refer to “formal observations” but does not define the term. EPA encourages IEPA to define the term such as requiring Method 22. Furthermore, the permit does not detail the follow up actions the permittee must take if the “formal observations” indicate that opacity is observed. For example, the observance of opacity could trigger a Method 9 test within 15 days or at the next time the generator is operated. Requesting a Method 9 test “upon written request by the Illinois EPA” as required in 7.7.7(a) and 7.8.7(a) is not sufficient. The permit must contain a methodology to assure compliance with the opacity requirements.
4. Condition 7.8.4(b) is not a non-applicability determination. In fact BP is still subject to the maximum achievable control technology standard (MACT) although “excluded from certain requirements.” IEPA should take this term out of section 7.8.4 and include it in section 7.8.3 and either define which MACT requirements this unit is excluded from or remove this practicably unenforceable phrase from the permit.
5. The statement of basis must include the rationale for the periodic monitoring required in section 5.0 of the permit and a basis for the periodic monitoring for section 7.8 in Table 8.