



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

MAR 14 2012

REPLY TO THE ATTENTION OF:

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 draft of the Clean Air Act Permit for Panhandle Eastern Pipe Line Company, (permit number 95120063). The existing source is major under the Title V program.

- 1) Section 2.5 of the Statement of Basis references conditions in the permit which restrict hazardous air pollutants (HAPs) so that the source is not considered to be a major source of HAPs. The referenced conditions appear to restrict hours of operation. It is not clear how the restriction of hours of operation limits HAPs from the source to levels below the major source thresholds. Please provide a discussion within the Statement of Basis that explains how the proposed restrictions on hours of operation assure that the source will not be major for HAPs. The source's status as a major or area source of HAPs is especially important for determining the applicable standards under the Maximum Achievable Control Technology (MACT) Standard for Reciprocating Internal Combustion Engines (RICE), 40 CFR 63 Subpart ZZZZ.
- 2) Additionally, the method used to limit HAP emissions from the facility, such that it achieves area source status for applicability of the RICE MACT Standard, must include the necessary associated monitoring methods for demonstrating compliance.
- 3) Condition 4.2.2.b.ii.A contains monitoring required for demonstrating compliance with Volatile Organic Material (VOM) Requirements for the Triethylene Glycol Dehydration Plant. The applicable limit for VOMs is 8 lbs/hr. However, the condition requires calculation of emissions using a model, GRI-GLYCalc, only once per year. Section 39.5.7.d.ii of the Illinois Environmental Protection Act states, "Where the applicable requirement does not require periodic testing or instrumental or noninstrumental monitoring (which may consist of recordkeeping designed to serve as monitoring), require periodic monitoring sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit, as reported pursuant to paragraph (f) of this subsection. The Agency may determine that recordkeeping

requirements are sufficient to meet the requirements of this subparagraph.” We recommend frequency of the calculation be increased significantly, in order to sufficiently monitor emissions in light of an 8 lb/hr limit.

- 4) Condition 4.1.2.b.i.A. limits emissions of Sulfur Dioxide (SO₂) to 2000 ppm. The operational and production requirements section includes a condition (4.1.2.d.i.A.) which restricts the facility to using “pipeline quality natural gas” as the means of demonstrating compliance with the 2000 ppm SO₂ limit. The permit/permit record is not clear on how the strict use of “pipeline quality natural gas” will result in compliance with SO₂ limit. Please provide a discussion in the permit record and/or clarify the permit as necessary.

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 further questions, please feel free to contact Danny Marcus, of my staff, at (312) 353-8781.

Sincerely,



Genevieve Damico
Chief
Air Permits Section