



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

MAR 16 2016

REPLY TO THE ATTENTION OF

Andrew Hall
Permit Review/Development Section
Ohio Environmental Protection Agency
Department of Air Pollution Control
50 West Town Street Suite 700
P.O. Box 1049
Columbus, Ohio 43216

Dear Mr. Hall:

On February 12, 2016, the U.S. Environmental Protection Agency submitted comments on the draft Title V renewal permit, permit number P0104782, for BP-Husky Refining LLC (BPH), located in Oregon, Ohio. We have continued our review of this permit and have the following additional comments.

Consent Decree

1. Permit condition 12(b)(2)(f) (pg. 151) states that the carbon monoxide Boiler shall be considered an affected facility for purposes of 40 CFR Part 60, Subpart J as a result of a 2001 Consent Decree (CD) and "not because the heater was modified or installed after the applicability date." EPA does not agree that the Subpart J provisions apply in these instances solely as a result of the CD. EPA is concerned that such a definitive statement will improperly lead to the removal of these requirements once the CD is terminated. Ohio EPA should remove the non-applicability language from the statement of basis.
2. Permit condition 18(d)(4) (pg. 239) lists 40 CFR Part 61, Subpart FF and the CD as the underlying authority for the carbon canisters monitoring requirements. Also, permit condition 18(g)(1), Table 1 (pg. 251-254) lists Subpart FF and the CD as the applicable standard for several pieces of equipment. The Title V permit must clearly state Part 61, Subpart FF as the origin of authority for these emission units.
3. Permit condition 20(b)(2)(b) for Sulfur Recovery Unit #2 and #3 (pg. 268) says "this permit to install (PTI P0119763 issued 10/30/2015) incorporates the emission limits and schedules set out in paragraphs 14-18 and 21 of the Consent Decree...." The Title V permit must specify which requirements apply to these emission units and must clarify that the PTI is the underlying authority for these requirements.

Coker 2 and 3 (P017 and P036)

4. Permit conditions 17(d)(2) (pg. 216) and 19(d)(4) (pg. 262) refer to monitoring equipment specified 40 CFR 63.644(a)(2). The permit conditions should include more details of the Part 63 requirements (i.e.; "a device (including but not limited to a thermocouple, an ultraviolet beam sensor, or an infrared sensor) capable of continuously detecting the presence of a pilot flame").

Refinery WWT System (P025)

5. Permit condition 18(b)(2)(c) (pg. 223) requires that all volatile organic compounds (VOC) emissions from the steam stripper shall be vented to a flare that complies with the requirements of OAC 3745-21-09(DD)(10)(d). It cites the origin of authority for this requirement to be OAC 3745-21-09(UU)(4).

However, OAC 3745-21-09(UU)(4), which applies explicitly to BPH, states that "... all VOC emissions from the steam stripper shall be vented to a flare that complies with paragraphs (DD)(10)(d) to (DD)(10)(f) of this rule." It is unclear why the requirements of OAC 3745-21-09(DD)(10)(e) and (10)(f) are not included in permit condition 18(b)(2)(c). Pursuant to OAC 3745-77-02(E)(1), please include all applicable requirements of 3745-21-09(UU)(4) in the permit.

Typographical errors

6. Permit condition 18(b)(2)i.ii. (pg. 225) should state "...and during treatment of the waste stream in accordance with **b)(2)i.i.**" instead of "...in accordance with b(2)g.i."
7. Permit condition 18(b)(2)i.iii. (pg. 225) should state "... the material is no longer subject to **b)(2)i.**" instead of "...b(2)g."

We appreciate the opportunity to provide comments on this permit. If you have any questions, please feel free to contact Sam Portanova, of my staff, at (312) 886-3189.

Sincerely,



Genevieve Damico
Chief
Air Permits Section