

OhioEPA
Division of Air Pollution Control (DAPC)

Response to Comments

Project: POET Biorefining - Fostoria formerly Fostoria Ethanol, LLC; Draft Air permit- to-install (PTI)
Ohio EPA ID #: PTI# 03-17304

Agency Contacts for this Project

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Ohio EPA held a public hearing on September 5, 2007 regarding draft air pollution permit #03-17304 for POET Biorefining - Fostoria. This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on September 6, 2007.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format.

Proximity of facility to Longfellow School

Comment 1: Multiple commenters expressed concern about the proximity of the facility to Longfellow School and the evacuation plan in the event an explosion occurs at the facility.

Response 1: The permit for the ethanol production facility was developed in accordance with air pollution rules and regulations which protect public health, including the health of sensitive populations such as asthmatics, children and the elderly.

In the event of an emergency involving the release of air contaminants, Ohio EPA's Division of Emergency and Remedial Response (DERR) will respond and take appropriate action to ensure public health and safety. Local emergency planning committees are designated for each county in Ohio and write chemical emergency response and preparedness plans. For additional information, contact the Seneca County Information Coordinator at (419) 447-0266.

Regulation of bioaerosols

Comment 2: Multiple commenters state that the Ohio EPA must regulate bioaerosols as a toxic air contaminant and include it as a pollutant of concern in this permit to install. The commenters urge the Director to begin the process of adding bioaerosols to the list of toxic air contaminants.

Response 2: Currently the Ohio EPA does not regulate bioaerosols. Ideally, regulators would like to eliminate all pollution and its risks, but this is usually not a realistic expectation. Regulators must address the most important risks and decrease them to the level at which they believe the risks are smaller than the benefits of the activity causing the pollution. The following link provides information on the process of identifying and regulating an air toxic of concern:
<http://www.epa.state.oh.us/dapc/regs/3745-114/3745-114SYNd2.pdf>

Length of comment period for air permit to install

Comment 3: Multiple commenters express concern that the end of the comment period was less than 24 hours of the public hearing sessions.

Response 3: Ohio EPA considers many items when determining the length of the comment period associated with a draft permit. The first and most important item is that the draft period conform with Ohio laws which require a minimum comment period of 30 days. The agency found it reasonable to end the comment period the day after the public hearing because a longer comment period was offered (39 days; (July 29, 2007 through September 6, 2007) and additionally a public hearing was scheduled without a request from the public. For most draft air permits, the comment period is 30 days and a request for a public hearing is required.

Comment 4: Multiple commenters request a 90 day extension of the comment period.

Response 4: See response to comment #3.

Application of BAT

Comment 5: Multiple commenters state the following emissions units fail to adopt BAT in controlling emissions at the proposed chemical ethanol plant in Fostoria: P001, P002, P003, P004, P005, P006, P010, P011 & T005.

Response 5: The emissions units in this permit did not obtain what the commenter calls a variance. The Ohio EPA is obligated to follow Ohio law. ORC 3704.03(T)(4) specifies that BAT does not apply to an air contaminant source that has the potential to emit (taking into account air pollution controls installed on the source) of less than ten tons per year of an air contaminant or precursor of an air contaminant for which a NAAQS has been adopted under the federal Clean Air Act. The ORC has been codified into Ohio EPA rules at 3745-31-05(A)(3)(b), Effective December 1, 2006. The source can accept voluntary synthetic minor type restrictions in the permit (either by use of operating restrictions or optional add-on controls) per OAC rule 3745-31-05(C) to restrict the emissions to below the 10 ton/yr BAT threshold. Until these changes to the SIP are approved or disapproved by USEPA, they are enforceable by the State of Ohio.

All of the emissions units specified above have emission limitations established, pursuant to OAC rule 3745-31-05(C), at a rate that is

less than ten tons per year by use of either add-on controls or operating restrictions.

Comment 6: **The commenters are concerned about a proper balancing of risk to human health with cost effective best available technology (BAT).**

Response 6: The permit for the ethanol production facility was developed in accordance with air pollution rules and regulations which protect public health which includes the application of BAT with appropriate cost effective determinations.

PM-2.5 and hazardous air pollutants (HAPs)

Comment 7: **Multiple commenters would like that PM2.5 be modeled, monitored and regulated.**

Response 7: The National Ambient Air Quality Standard (NAAQS) for PM2.5 was designated on April 5, 2005. For this pollutant to be regulated by the state of Ohio, Ohio EPA must promulgate regulations to implement the NAAQS standard. During the SIP development period, U.S.EPA requires states to use PM-10 as a surrogate to address the requirements of NAAQS for PM-2.5. By establishing a PM-10 emission limit in the interim period, states will effectively mitigate increases in PM-2.5 emissions and protect air quality because PM-2.5 is a subset of PM-10 emissions.

Comment 8: **The commenter states that as with PM-2.5, multiple monitors should be installed to determine levels of HAP emissions - before and continuously after startup - of this new emission source to determine the effect on the community, industry and public health.**

Response 8: The permit for the ethanol production facility was developed in accordance with air pollution rules and regulations which are protective of public health and the environment. Ohio EPA does not feel that an air monitor is warranted for this location at this time. Ohio EPA would certainly consider an air monitor in the future based any new or additional information that may warrant such monitoring.

Comment 9: **The commenters ask for disclosure of HAPS and insurance that the HAPS do not exceed 10 tons per year for any individual HAP and 25 tons per year of aggregated HAPS.**

Response 9: Information regarding HAPs was included in the permit application. Individual HAPs from this project do not exceed 10 tons per year

and the aggregate HAPs from the project do not exceed 25 tons per year. The permit does require testing to confirm the emissions of HAPs from the facility.

Blanket VOC emissions

Comment 10: **Multiple commenters state that a blanket volatile organic compounds (VOCs) emissions limitation does not adequately address HAP emissions and that the public should have full disclosure of each air contaminant.**

Response 10: Limitations for individual air toxic compounds and hazardous air pollutants are only established in very specific instances. Ohio EPA feels that the established limitations for volatile organic compounds effectively restricts emissions of air toxic compounds and hazardous air pollutants such that public health and the environment are protected. Also see response to comment #9 information on how HAPs were addressed.

Accounting of emissions

Comment 11: **Multiple commenters state that all emissions from all units should be accounted for before and after emission control equipment, because equipment can reasonably be expected to be inoperable at times from routine maintenance, as well as unintended downtime for repairs.**

Response 11: The uncontrolled emissions are presented in the permit application, which is available to the public for review; the current procedure employed by the agency does not require uncontrolled emissions to be presented in the issued permits. The malfunction and maintenance of control equipment is regulated under OAC rule 3745-15-06.

Comment 12: **Multiple commenters would like to know what the modeling of all air emissions from this facility will be when the emission control equipment is non-operational.**

Response 12: The permit requires the use of control equipment at all times except for a 500 hour period associated with the RTO being non-operational. When the RTO is not operational emissions continue to be controlled with a scrubber and drying operations must be discontinued. Emissions associated with RTO downtime have appropriately modeled and addressed by the permit.

Size of the facility

Comment 13: Multiple commenters would like POET-Fostoria to clarify exactly how many millions of gallons per year of ethanol it intends to produce on site because a press release issued by the facility contradicts what is specified in the PTI as the annual ethanol production rate.

Response 13: The air permit to install was written based on the production of 69 million gallons of denatured ethanol.

Comment 14: Multiple commenters state that the permit should be issued as a major polluter, i.e. as a Title V permit.

Response 14: The potential to emit for each criteria pollutant (VOC, PM10, CO, NOx and SO2) from this facility is currently less than the 100 tpy Title V threshold.

Comment 15: Multiple commenters state that the “maximum production” rates shown in the application do not necessarily reflect the actual “maximum design capacity” of the equipment.

Response 15: The permit requires the testing of emissions unit while operating at maximum capacity. As part of the initial testing and future testing requirements, the maximum capacity of emission units will be analyzed to ensure the operation has not been altered such that the presented maximum capacity in the application has been exceeded. Ohio EPA will also evaluate the maximum capacity of emission units based on inspections and data obtained in other required reports. If the company violates requirements contained in the issued final air PTI, Ohio EPA will take appropriate steps to resolve the matter including, but not limited to, enforcement action which could result in more air pollution controls and/or reduction of emissions at the facility and a future permitting action.

Comment 16: Multiple commenters asked if OEPA will require that the RTO be sized appropriately to reduce emissions? Also will OEPA require a second RTO to further reduce emissions, as well as to serve as a backup during the downtime of the primary RTO?

Response 16: The permit requires testing of the RTO to demonstrate compliance with the control efficiencies established in the permit. A second RTO is not required by the permit and an RTO downtime of 500 hours has been addressed by the permit. Any scheduled maintenance activity or malfunction of the RTO that results downtime beyond the 500 hours allowed by the permit would be addressed by OAC rule 3745-15-06.

Disclosure of information

Comment 17: Multiple commenters request that regular disclosure of all emissions, test results, complaints and violations be made available to the public.

Response 17: All Ohio EPA documents, including those associated with this facility, are public record (except for confidential documents) and are available for review by the public at the Ohio EPA 's Northwest District Office in Bowling Green, Ohio. Ohio EPA is considering setting up a document repository in the local library.

Comment 18: The commenters state that a representative for the citizens affected by the operation of POET Biorefining - Fostoria should be present during any negotiations between Ohio EPA and the applicant with respect to modifications of the draft permit.

Response 18: Any significant modifications to the permit would go through the normal permit process including the opportunity for public comment. Citizens are notified when any application for a permit modification is received, when any draft is issued, when any comment period is and when any public hearing is to be held. Citizens are given the opportunity to participate in these processes. Ohio EPA is amenable to meeting with citizens to discuss any permit modification should the occasion arise.

Environmental Impact Statement

Comment 19: Multiple commenters state that an environmental impact statement should be completed which addresses all of the emissions noted within their comments, those currently regulated and those that are not – those that are continuously emitted, those which may be emitted as a result of non-operation of emission control equipment, and those which may be emitted in case of a disaster.

Response 19: The permit addresses all pollutants in accordance with environmental regulations which do not require an environmental impact statement in this instance.

Relocation of the proposed site

Comment 20: Multiple commenters state that in the absence of their stated conditions, the plant should be relocated to an agricultural

area where the farmers economically benefit from its operation and desire its presence.

Response 20: Ohio EPA air permitting rules and regulations do not involve requirements associated with the location of a facility.

Basis for the applicable allowable emissions

Comment 21: The commenters ask if the reported emissions are based upon corn throughput?

Response 21: Emissions are based on corn throughput for the operations which process corn (i.e. grain receiving, emissions unit P901).

Future increase in volume of ethanol produced

Comment 22: The commenters ask if the emissions will be altered if different volumes of ethanol are produced from the corn?

Response 22: If the facility produces ethanol in excess of the 69,000,000 gallons, the facility must report the deviation and the agency would review the situation to determine if a modification and/or violation of the current permit occurred. Any violations of the current permit would be addressed in accordance with current enforcement procedures. If a permit modification is required as the result of any violations, the action will be public noticed and the proceedings will be open to public participation.

Comment 23: The commenters ask if the emissions projections take into account production from highly fermentable starch corn versus traditional yellow dent corn?

Response 23: No. The limits and restrictions do not distinguish between traditional and highly fermentable corn. Any violations of the current would be addressed in accordance with current enforcement procedures. If a permit modification is required as the result of any violations, the action will be public noticed and the proceedings will be open to public participation.

Wet distillers grains

Comment 24: The commenters have a concern regarding wet distillers grains stored on site.

Response 24: Emissions unit P802 of the air permit to install address the emissions from the wet distillers grains or "wetcake". The facility is

restricted to 522,972 tons of wetcake per year. The permit requires the storage area to be a four-sided enclosure and that the wetcake be removed from the storage area within 48 hours.

Ammoniation and aflatoxins

Comment 25: The commenters expressed concerns in regards to ammoniation and aflatoxins in feedstock corn and distillers grain

Response 25: Aflatoxin contamination is a concern to all the industries that use and process corn. Aflatoxin contamination is uncommon in corn grown in Midwestern states, but can occur under stressed growing conditions such as a severe drought. Industries involved in corn use and processing employ practices to prevent aflatoxin contaminated corn from being received for processing. Such practices include sampling of corn grown in areas that may be susceptible to aflatoxin contamination and "turning away" such sources of corn. The Ohio Department of Agriculture is also involved regulating the presence of aflatoxin in corn and corn products. Regulations and industry practices that address aflatoxin contamination result in protection of public health.

Confined animal feeding operations (CAFOs)

Comment 26: The commenters state that confined animal feeding operations (CAFOs) and ethanol facilities are normally in close proximity to one other and the distiller's grains from ethanol facilities are often fed to animals housed in CAFOs, the emissions from these two facilities should be aggregated.

Response 26: The air permit does not designate the final location of any products produced at the facility. Questions and inquires associated with permits for combined animal feeding operations or "factory farms" need to be addressed by the Ohio Department of Agriculture.

Environmental Justice

Comment 27: Multiple commenters state they would like Environmental Justice. The commenters state a trust fund in the amount of \$50,000,000 should be established for the benefit of those who may be negatively impacted by the operation of Fostoria Ethanol LLC to compensate for the loss of property value, relocation costs, damage to health and a health monitoring program. Additionally, provisions must be made for a warning

system in the event of disaster, and coverage for the costs associated with emergency evacuation incurred by impacted residents.

Response 27: As a recipient of federal funding, Ohio EPA is under a legal obligation to comply with Title VI of the Civil Rights Act. We have fully reviewed the guidance developed by U.S. EPA for states regarding environmental justice. Ohio EPA meets our legal obligations and implement federal guidance through both our technical review and our public involvement activities on permit applications.

Additionally, any recipient of federal funding, such as Ohio EPA, must comply with Title VI of the Civil Rights code. Under U.S. EPA's Title VI implementing regulations, States are prohibited from using criteria or methods of administering its program which have the effect of subjecting individuals to discrimination because of their race, color or national origin. As a result, States may not issue permits that are intentionally discriminatory or issue permits that have a discriminatory effect based on race, color or national origin. While we do not have a specific environmental justice policy to follow, we consider all comments raised regarding environmental justice to ensure we comply with Title VI.

Ohio EPA has also found that the most effective way to address environmental justice concerns is by building partnerships with community organizations. For example, our Northeast District Office has worked with the St. Clair Superior Neighborhood Development Association's Environmental Workgroup for a number of years. Ohio EPA worked closely with this group to increase environmental awareness and compliance in the community. U.S. EPA has stated that this committee did one of the best jobs carrying out the principles of environmental justice in Region V. Some benefits to the neighborhood included:

- Increased public participation and input in the development of federal Title V air permits.
- Increased inspections of companies and resolutions of neighborhood concerns.
- Better assurance to the neighborhood that companies are in compliance with their environmental permits. The neighborhood received copies of inspection reports and permits for companies they are concerned about.

In addition to these benefits, we have also directed enforcement penalties into environmental projects that benefit the community. For more information on this partnership, please visit:

<http://www.stclairsuperior.org/>.

Some other examples include:

Cleveland Air Century Campaign - Ohio EPA has been an active member of the Cleveland Clean Air Century Campaign since 2001. As a project partner of the Campaign, Ohio EPA acts as a technical resource and assists with projects that increase awareness and understanding of air quality issues. The Cleveland Clean Air Century Campaign engages potentially affected community residents and gives them an opportunity to participate in activities that affect their environment and/or health.

Earth Day Coalition's Sustainable Cleveland Partnership (SCP) - Ohio EPA has partnered with this group which is a local initiative in neighborhood-based environmental protection for low-income and/or minority communities. SCP training workshops have included such modules as the right-to-know laws, environmental risk regulation and reduction, environmental audits of specific neighborhoods, Title V air permit program. SCP organizes tours of industrial parks, participates in public hearings and media events, leads citizen campaigns on pollution prevention for large stationary sources, and builds capacity in a variety of minority constituent groups including citizens' councils, street and block clubs, community centers and development associations, and schools and churches.

We also develop specific communication plans for permits in areas that are deemed potential environmental justice areas such as East Liverpool and neighborhoods in Cincinnati.

Emissions unit P007 (evaporation unit)

Comment 28: The commenters would like to know what type of emission control is in use with the evaporation unit and if the wet scrubber always in operation at the fermentation unit - or only at times that the RTO is not operating?

Response 28: The evaporation unit is controlled by the RTO. The wet scrubber is in operation at all times during fermentation.

Comment 29: The commenters would like to know where the emissions from the evaporation unit accounted for and if these emissions controlled or fugitive?

Response 29: Please see response to comment #28.

Emissions units P008 and P009

Comment 30: The commenter would like an explanation of the reporting term that requires the permittee to submit deviation reports in regards to the use of natural gas.

Response 30: The use of natural gas as a fuel showed compliance with air pollution rules and regulations. The permit has included reporting requirements for insurance that other fuels are not utilized.

Comment 31: The commenter would like to know if a deviation from the use of natural gas constitute an enforcement trigger - or an implicit waiver?

Response 31: The use of fuels other than natural gas would be considered a violation of the permit conditions and would be addressed in accordance with current agency enforcement procedures.

Comment 32: The commenter would like to know what penalties apply for multiple violations?

Response 32: Each violation is addressed individually in accordance with current enforcement procedures. The presence of multiple violations does not result in different enforcement procedures.

Comment 33: The commenter states that the OEPA must clarify what fuels in addition to natural gas the applicant will be using to power the dryers and make known the impact of these fuels upon use from these emissions units.

Response 33: The applicant is permitted to only use natural gas as is specified in operational restriction B.1 of the permit. The use of fuels other than natural gas would be considered a violation of the permit conditions and would be addressed in accordance with current enforcement procedures.

Comment 34: The commenters ask if the driers must shutdown during scheduled maintenance, and how much time is permitted for such scheduled maintenance?

Response 34: Any scheduled maintenance activity of the RTO that results downtime beyond the 500 hours allowed by the permit would be addressed by OAC rule 3745-15-06.

Comment 35: The commenters ask how many hours per year are the two dryers permitted to operate if not continuously?

Response 35: The annual allowable emission limitation for these emissions units are based on 8760 hours per year of operation. These emissions units can operate continuously as long as the RTO is in operation.

Comment 36: The commenters ask what reporting/monitoring provisions are necessary to assure compliance with a condition limiting operation of this nature (i.e. unscheduled maintenance specified in P007 and the shut down of P008 &P009 during those times)?

Response 36: The permit for the dryers (emissions units P008 and P009) contains an operational restriction to shutdown the emissions unit when the RTO is down and requires the applicant to report deviations from that restriction within 30 days.

Comment 37: Multiple commenters state that the OEPA should request the applicant to breakout emissions from the dryers individually, and in the breakout require the reporting of the HAPs contained therein individually so that a determination of MACT can be made.

Response 37: The emission information as presented in the application allowed Ohio EPA to properly determine compliance with applicable air pollution rules and regulations. HAP emissions from the facility have been quantified and do not exceed the major source threshold for MACT applicability. The permit does require testing to confirm the emissions of HAPs from the facility (See response to comment #9).

Emissions unit P010

Comment 38: **The commenter would like to know if the DDGS cooling and storage (emissions unit P010) operation is controlled by the baghouse on the cooling tower and the commenter would like an explanation of “most common method of emission control being used” and “Best Available Technology” The commenter also expressed concern about the ‘waiver’ of control of VOC’s on emissions unit P010 due to the expense of controlling those emissions.**

Response 38: The cooling bed emissions are reflected in the permit in the terms and conditions for emissions unit P010. The particulate emissions from the DDGS cooling bed and storage (emissions unit P010) are controlled by a baghouse. The cooling tower emissions (emissions unit P011) are not controlled by a baghouse.

The permit does not contain the language “most common method of emission control being used” and this agency does not have a definition of the statement. OAC rule 3745-31-05(T) defines “Best Available Technology” as any combination of work practices, raw material specifications, throughput limitations, source design characteristics, an evaluation of the annualized cost per ton of air pollutant removed, and air pollution control devices that have been previously demonstrated to the director of environmental protection to operate satisfactorily in this state or other states with similar air quality on substantially similar air pollution sources.

As per the definition of BAT stated above, the total annual cost per ton of air pollutant removed is a contributing factor used to determine the best available technology.

Emissions unit P901

Comment 39: **Commenters are requesting clarification of permit page 131 for term A.2.f stating that standards applied to other grain elevators or oil extraction plants with storage for greater than 1.0 million bushels of corn will not apply to the applicant. The permit appears to be in error in stating that the applicant has a storage capability of 3.0 bushels of corn?**

Response 39: This error has been corrected. The storage capacity of the facility is 3 million bushels. The language will be modified in the final permit to install.

Comment 40: **The commenters would like the grain receiving facility to apply “complete” enclosure and utilize a wet scrubber as BAT.**

Response 40: The use of a partial enclosure with aspiration to a baghouse for grain receiving meets BAT requirements and is consistent with the requirements applied at other ethanol production facilities.

Emissions units T001, T002, T003, T004 and T005

Comment 41: **The commenters are requesting clarification on the annual throughput allowance of 86,000,000 gallons of ethanol, permit page 143, Part B.1., as the plant is permitted for only 69,000,000 gallons of ethanol annually.**

Response 41: The throughput restriction was based the overly conservative assumption that the maximum capacity of the tank would be turned over (meaning emptied and filled) once for each operational day of the year. The maximum throughput of each ethanol storage tank cannot exceed 65,550,000 gallons per year based on a maximum production capacity of 69,000,000 gallons of denatured ethanol for the facility. Since the throughput of each ethanol tank is physically limited by the annual production of denatured ethanol the throughput restriction and all associated monitoring, record keeping and reporting will be removed from the permit. The permit will be revised with the following language:

"The annual allowable emission rate is based on the annual production of 69,000,000 gallons denatured ethanol. Since the facility annual production rate is equivalent to the maximum facility capacity, no operational restrictions, monitoring, record keeping or reporting requirements are necessary to ensure that this emissions unit does not exceed its annual allowable emission rates. The requirement to record the amount of ethanol produced is in the terms and conditions of emissions unit J001"

Comment 42: **The commenters are requesting clarifications on calculations for the allowed annual throughput of the aggregate totals of denatured ethanol storage tanks (T003 & T004), each with a capacity for 2,000,000 gallons. Each tank is listed as having an annual throughput allowance of 46,200,000. The total allowed annual throughput of the combined tankage exceeds the permitted amount by over 23 million gallons/year. Permit pages 155, 2.a, 2.a and 162, 2., 2.a .**

Response 42: The throughput restriction of 46,200,000 gallons for each individual tank does NOT result in an annual total combined throughput of 92,400,000 gallons. The throughput restrictions allows for operational flexibility which allows a single tank to store up to 67% of the total denatured ethanol production (i.e. T003 could store 46,200,000 gallons while T004 stored 22,800,000 gallons).

Comments that air pollution regulations do not address.

Comment 43: Multiple commenters state that the applicant should fund a five person citizen's environmental advisory board.

Comment 44: Multiple commenters suggests that the applicant should provide specific security measures to address vandalism or terrorist attack.

Comment 45: Multiple commenters state that the applicant should establish a greenbelt buffer zone.

Comment 46: Multiple commenters state that financial assurances and accountability should required of Fostoria Ethanol LLC, the major construction contractors and the operator, in the event of harm to area residents or the environment, along with full disclosure of prior operating and litigation records as they relate to the applicant's credibility in meeting its social and economic responsibilities.

Comment 47: Multiple commenters requests that the applicant provide payment for health assessment and health monitoring for potentially affected persons.

Comment 48: Multiple commenters request that a natural resource damage assessment and restoration fund be established.

Comment 49: Multiple commenters state that there be assurance made of financial accountability of Fostoria LLC and the operator in the event of harm to area residents or the environment.

Comments from ENSR Corporation on behalf of POET Biorefining - Marion formerly Marion Ethanol, LLC

Comment : The official name of the facility has been changed to POET Biorefining - Marion. Neither the ownership nor responsible official has changed.

Response : The final permit will reflect the official name change of the facility to POET Biorefining – Marion.

Comment : Multiple typographical errors

Response : **The following table addresses each typographical error as specified in the commenters letter. It is noted whether or not the Agency will modify the permit and justification for such action.**

Emission Unit	Description	Response
B001,J001, P007,P008, P009,P010,	air toxic pollutants	All air toxic language will be modified to reflect the total emissions of the permit.
J001	VOC emission rate	Applicable emission limitation will be changed to is 3.55 TPY based on the following: 5.14 lbs/kgal x 69,000 kgal/yr x 0.02 x ton/2000 lbs
	CO emission rate	Applicable emission limitation will remain 2.90 TPY based on the following: 0.084 lbs/kgal x 69,000 kgal x ton/2000 lbs
	NOx emission rate	Applicable emission limitation will be changed to 1.15 TPY based on the following: 0.0334 lb NOx/kgal x 69,000 kgal/yr x ton/2000 lbs

P007/008/009	CO emission rate	<p>Commenter states the applicable emission limitation is 10.47 lbs/hr. Calculations show an emission rate of 10.52 TPY.</p> <p>process + RTO combustion</p> <p>8.0 lbs/hr + (84 lbs/mmscf x BTU/1000 scf x 30 mmBtu/hr)</p> <p>Applicable emission limitation will be modified to 10.52 lbs/hr.</p>
	CO emission rate	<p>Applicable emission limitation will be changed to 46.08 TPY based on the following:</p> <p>10.52 lbs/hr x 8760 hr/yr x ton/2000 lbs</p>
	PM10 emission rate	<p>Applicable emission limitation will be changed to 30.35 TPY based on the following calculation:</p> <p>6.93 lbs/hr x 8760 hr/yr x ton/2000 lbs</p> <p>Hourly emission limit will be changed to 6.93 lbs/hr based on the following:</p> <p>process emissions + combustion emissions</p> <p>(50,000 dscfm x 0.135 gr/dscf x 60 min/hr x lb/7000 gr x 0.1) = 5.79 lbs/hr</p> <p>+ (7.6 lbs/mmscf x scf /1000 BTU x 150 mmBtu/hr) = 1.14 lbs/hr</p>
	VOC emission rate	<p>Applicable emission limitation will be changed to 10.53 lbs/hr based on the following:</p> <p>process emissions + combustion emissions</p> <p>9.70 lbs/hr +</p> <p>(5.5 lbs/mmscf x scf/1000 BTU x 150 mmBtu/hr) = 0.83 lb/hr</p>

	VOC emission rate	Applicable emission limitation will be changed to 46.12 TPY based the following: 10.53 lbs/hr x 8760 hr/yr x ton/2000 lbs
P007	VOC emission rate - Down Time	Applicable emission limitation will be changed to 30.76 lbs/hr based on the following: 615.2 lbs/hr x (1-0.95)
P007	VOC emission rate - Down Time	Applicable emission limitation will be changed to 7.69 TPY based on the following: 30.76 lbs/hr x 500 hr/yr x ton/2000 lbs
P010	PM10 emission rate	Applicable emission limitation will be changed to 4.78 TPY based on the following: [0.004 gr/dscf x (23,800 + 4000 + 4000) dscfm] x 60 min/hr x lb/7000 gr x 8760 hr/yr x ton/2000 lbs
	VOC emission rate	Applicable emission limitation will remain 21.90 TPY as stated in draft PTI based on the following: 5.0 lbs/hr x 8760 hr/yr x ton/2000 lbs
P011	PM10 emission rate	Applicable emission limitation will be changed to 1.63 lbs/hr based on the following: 26,000 gal/min x 0.00005 x 3.79 L/gal x 60 min/hr x 2500 mg/L x lb/453592.4 mg
	PM10 emission rate	Applicable emission limitation will be changed to 7.14 TPY based on the following: 1.63 lbs/hr x 8760 hr/yr x ton/2000 lbs

P012	CO emission rate	Applicable emission limitation will be changed to 1.18 lbs/hr based on the following: 0.20 g/Hp-hr x 2680 Hp x lb/454 g
	SO2 emission rate	Applicable emission limitation will be changed to 10.72 lbs/hr based on the following: 0.004 lb/Hp-hr x 2680 Hp
	SO2 emission rate	Applicable emission limitation will be changed to 0.54 ton per rolling 12-month period based on the following: 10.72 lbs/hr x 100 hr/yr x ton/2000 lbs
P801	VOC emission rate	Applicable emission limitation will remain as stated in the draft PTI based on the following: 3.70 TPY from sources is VOC service + 4.60 TPY from equipment leaks in tank farm service, as is specified in the calculations submitted by the company.
P802	VOC emission rate	Applicable emission limitation will be changed to 2.17 TPY based on the following: 522,972 tpy x 0.0083 lb/ton x ton/2000 lb
P901	PM10 emission rate	Applicable emission limitation will be changed to 5.41 TPY based on the following: 0.004 gr/dscf x lb/7000 gr x 36,000 cfm x 60 min/hr x 8760 hr/yr x ton/2000 lb
P902	fugitive PE emission rate	Applicable emission limitation will be changed to 4.33 TPY based on the following: 201,480 TPY x 0.086 lb PE/ton x 0.5

	fugitive PM10 emission rate	Applicable emission limitation will be changed to 1.46 TPY based on the following: 201,480 TPY x 0.029 lb PE/ton x 0.5
T001 and T002	VOC emission rate	Applicable emission limitation will be changed to 0.37 TPY based on the following: 745.27 lbs/yr x ton/2000 lb

Comment : Emissions Unit P001, Part II.A.2.d and Emissions Unit P901 Part II.A.2.e indicate 40 CFR Part 60 Subpart DD is not applicable. Commenter believes this rule is applicable.

Response : The rule is applicable and the Agency will modify the language to reflect such.

Comment : Emissions unit P801, Part II.A.2.f indicates that the connectors at the facility will comply with 40 CFR Part 65, Subpart F. Commenter states that the facility will comply with 40 CFR Part 65, Subpart F for valves, pumps, relief valves and connectors.

Response : The Agency will modify the language to reflect compliance with 40 CFR Part 65, subpart F for the valves, pumps, relief valves, and connectors at the facility.

Comment : Storage Tank T005 Throughput Limit should be changed from 3,045,600 gallons to 3,450,000 gallons.

Response : The Agency will modify annual throughput for tank T005 to 3,450,000 gal/yr.