



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

APR 15 2008

W. Clark Smith
Permitting Section Supervisor
Air Quality Division
Nebraska Department of Environmental Quality
P.O. Box 98922
Lincoln, NE 68509-8922

RE: NatureWorks, LLC, Blair Nebraska PSD construction permit comments

Dear Mr. Smith:

On March 12, 2008, the United States Environmental Protection Agency (EPA) Region 7 received notification of the Nebraska Department of Environmental Quality's (NDEQ) intent to approve the Prevention of Significant Deterioration (PSD) construction permit for NatureWorks, LLC (NatureWorks) to modify an existing polymer production facility located at 650 Industrial Road in Blair, Nebraska. We appreciate the opportunity to review the draft permit and provide the following comment.

The project includes allowing the two existing natural gas-fired hot oil heaters to be modified to increase maximum heat input from 62.4 MMBtu/hr to 75 MMBtu/hr. The existing permit limits the hot oil heaters to NOx emissions of 0.03 lb NOx/MMBtu; however, the draft permit language does not include the NOx emissions limit for the two hot oil heaters. Furthermore, the permitting record does not explain why this limit is being lifted other than to state that they were based on vendor guarantees and not regulatory requirements or standards. In the original permit, the vendor guaranteed the units to achieve the 0.03 lb NOx/MMBtu, but the current draft permitting record does not explain why the units will no longer be able to achieve the limit. We recommend that the permitting record clearly document the reason for the change anytime a permit limit is changed or removed.

As always, we appreciate the opportunity to provide what we hope you will find to be constructive comments. Please contact Patricia Scott at (913) 551-7312 if you have any questions or comments regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Smith".

Mark A. Smith, Chief
Air Permitting and Compliance Branch
Air and Waste Management Division