



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

AUG 05 2008

Marian Massoth, Air Permitting Chief  
Kansas Department of Health and Environment  
Bureau of Air and Radiation  
1000 SW Jackson, Suite 310  
Topeka, KS 66612-1366

RE: National Cooperative Refinery Association PSD Construction Permit comments

Dear Ms. Massoth:

On July 10, 2008, the United States Environmental Protection Agency (EPA) received notice from the Kansas Department of Health and Environment (KDHE), of the intent to approve the Prevention of Significant Deterioration (PSD) construction permit for National Cooperative Refinery Association (NCRA) to undertake its heavy crude expansion project and its benzene reduction project. The facility is located at 1391 Iron Horse Road, McPherson, Kansas. We have completed our review of the draft permit and have the following comments.

In review of the draft permit, the following items were observed:

#### Comment 1.

Page 8. Permit Conditions. 40 CFR Part 60 Subpart A – General Provisions Requirements, 5. The paragraph references 40 CFR 60.11 (f) and (g); however, language for section (g) has been omitted. We recommend that the language for section (g) be included in the paragraph.

#### Comment 2.

Page 8. BACT Limits for New and Modified Heaters, ATS Stack, and New Baghouses. For the process heaters. The first paragraph appears to have a typographical error that sets the 365 day rolling average at 160 ppm at 0% O<sub>2</sub>. The limit should be 60 ppm at 0% O<sub>2</sub> for the 365 day rolling average.

In review of the Permit Summary Sheet, the following items were observed:

#### Comment 3.

Page 4. Best Available Control Technology (BACT), For the process heaters. The first paragraph mirrors the statement in the permit and appears to have a typographical error that sets the 365 day rolling average at 160 ppm at 0% O<sub>2</sub>. The limit should be 60 ppm at 0% O<sub>2</sub> for the 365 day rolling average.

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". The signature is fluid and cursive, with a large initial "M" and a stylized "S" at the end.

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