



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

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

DEC 06 2011

Dear Ms. Massoth:

We have reviewed the prevention of significant deterioration (PSD) permit for Columbian Chemicals Company for the tail gas flare and boiler. After reviewing the draft permit and application we have the following comments. We provide the comments to help ensure the project meets the federal Clean Air Act (CAA) requirements, that the permit will provide necessary information so that the basis for the decision is transparent and readily accessible to the public, and that the record provides adequate support for the permit decision.

The permit limits the oil feedstock to reactors No. 2 and No. 3 to four percent or less sulfur by weight on a 12 month rolling average. The permit is not clear on how the average is calculated. It implies that oil purchase records should be used. We suggest that the permit clarify that the sulfur limit be based on a weighted average calculated by:

$$average = \frac{\sum_{i=1}^n s_i v_i}{\sum_{i=1}^n v_i}$$

where n is the number of shipments in last 12 months;
 s is the sulfur content by weight of the oil shipment; and
 v is the volume purchased in the oil shipment.

We also suggest that the permit require Columbian Chemicals Company to maintain records of these calculations on-site for at least two years to allow inspections to verify that the calculations are being performed correctly.

We appreciate the opportunity to provide what we hope you will find to be constructive comments. Please contact Ward Burns at (913) 551-7960 if you have any questions or comments regarding this letter.

Sincerely,

for Mark Smith, Branch Chief
Air Permitting and Compliance Branch

cc: Mr. James D. Stewart
Kansas Department of Health and Environment

