

**BART DETERMINATION
SUPPORT DOCUMENT ADDENDUM FOR
REVISION 1 TO BART ORDER #7836
ISSUED TO THE BP CHERRY POINT REFINERY
BLAINE, WASHINGTON**

Prepared by

**Washington State Department of Ecology
Air Quality Program**

May 2013

Contents

Summary of Proposal..... 3
The Revision Request 3
Analysis of Request 3
Clarification of BART Determination for Boilers #1 and #3 4
Proposed BART Order Revision 4

Summary of Proposal

The BP Cherry Point Refinery (BP) has requested a revision to the BART order to remove the emission limitations for Boilers #6 and 7. The request is based on the finding that the boilers were erroneously included in the BART Order.

BP commented to this effect in comments submitted to the Environmental Protection Agency (EPA) on EPA's proposed approval of this BART Order as part of the Regional Haze State Implementation Plan. Subsequent to the close of the public comment period, EPA has advised Ecology that removal of the emission requirements for boilers # 6 and #7 from the Order and submitting the revision as a technical correction to the SIP submittal would be acceptable.

Removal of the boilers from the BART Order does not reduce the stringency or eliminate any emission limitations on the boilers. These requirements remain in the Air Operating permit issued to BP and are contained in the underlying regulations and Orders of Approval to Construct (OAC) issued by the Northwest Clean Air Agency.

The changes requested by BP Cherry Point Refinery are reasonable and do not allow for new or additional emissions of NOx from Boilers #6 and #7 at the refinery.

The Revision Request

BP has requested Ecology to revise BART Emission Limitation 2.1.1 of the BART Order #7836. In comments submitted to EPA on the proposed partial approval of the Washington Regional Haze Plan into the SIP, BP also requested EPA to not approve this and all other conditions in the BART order related to Boilers #6 and #7.

Analysis of Request

Boilers # 6 and #7 began operation in 2008, 30 years after the end of the time period that is used to define a BART source¹. These two new boilers replaced 2 boilers that were BART eligible. EPA has advised us that removal of these non-BART boilers from the BART order can be submitted as a technical revision of the Regional Haze SIP.

The current BART order contains emission limitation and operational criteria that came from the requirements in OAC 1001a and PSD permit #07-01. These permits approved the installation and operation of boilers #6 and #7. Boilers # 6 and #7 replaced the two BART eligible boilers, #1 and #3. These two New Source Review permits remain in force after completion of the revision.

¹ Sources subject to BART are those sources and emission units on a list of 26 source categories that began operation after August 7, 1962, and came into existence before August 7, 1977.

Clarification of BART Determination for Boilers #1 and #3

Ecology originally included the emission limitations for and the requirement to operate Boilers #6 and #7 as the BART emission control technology for the BART eligible Boilers #1 and #3. EPA has advised of that this was an incorrect inclusion. The only BART requirements related to Boilers #1 and #3 that must remain in BART Order are in BART Emission Limitation 7, which requires these units to cease operation by March 27, 2010.

Proposed BART Order Revision

Ecology proposes to revise the issued BART Order by removing BART Emission Limitations 1.1, 1.3.1, 2.1, 3.1, and 6.1. Remaining BART Limitations will be renumbered as required. The compliance date contained in Condition 5 is also being revised to reflect the effective date for the original order, August 7, 2009.