

**Concise Explanatory Statement  
from the Washington Department of Ecology's Air Quality Program  
Responding to Written Public Comments on the  
Proposed Amendments to  
PSD Permit No. 5, Second Amendment  
and  
PSD Permit 95-01, First Amendment  
for BP Cherry Point Refinery**

Written comments were received during the public review/comment period from Steven J. Mrazek (Sr. Environmental Engineer, BP Cherry Point Refinery):

1. Relative to PSD No. 5, your request that "compliance demonstration [for Approval Condition 1] be based on the average of at least three 1-hour test runs" was already described in Approval Condition 6. No change is necessary to satisfy your request.
2. Dee Morse of the National Park Service verified that BP Cherry Point satisfied the conditions of Approval Condition 2 in PSD-95-01.<sup>1</sup> Ecology removed Approval Condition 2 from the final version of PSD Permit 95-01, First Amendment.
3. Ecology agrees with modifying Approval Condition 3 (now Approval Condition 2) in the final version of PSD Permit 95-01, First Amendment to facilitate future updating of the monitoring procedure for Approval Condition 1.
4. Ecology agrees with modifying Approval Condition 4 (now Approval Condition 3) in the final version of PSD Permit 95-01, First Amendment to keep in consistent with Approval Condition 2.
5. Under the terms of the Ecology-EPA Region 10 delegation agreement, Ecology cannot delegate approval of amended monitoring methodology solely to the Northwest Clean Air Agency (NWCAA) under a PSD permit. Practically-speaking, this should impose little on amending the monitoring procedure. Ecology is very likely to give deference to NWCAA's expertise and familiarity with BP Cherry Point's operating practices.

Bernard Brady, P.E.  
Environmental Engineer  
January 12, 2009

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<sup>1</sup>Dee Morse (Environmental Protection Specialist, Air Resources Division, Natural Resource Program Center, National Park Service) to Elizabeth Waddell (Seattle Office, National Park Service), electronic message January 9, 2009.