



Air Quality Permitting Response to Public Comments

November 7, 2008

Tier I Operating Permit No. T1-050032

**Chevron Pipe Line Company and Northwest Terminalling
Company, Boise Terminal**

Facility ID No. 001-00026

Prepared by:
Harbi Elshafei, Permit Writer
AIR QUALITY DIVISION

Final

1. BACKGROUND

As deemed appropriate by the Director, the Department of Environmental Quality (DEQ) provided for public comment the proposed revision to the Tier I Operating Permit T1-050032 for Chevron Pipe Line Company and Northwest Terminalling Company (Chevron), Boise Terminal, Idaho.

In accordance with IDAPA 58.01.01.364, DEQ provided the draft Tier I operating permit for Chevron for public comment from September 20, 2008, through October 20, 2008. DEQ received comments from Chevron and the Idaho Conservation League. The comments and DEQ's response are provided in the following section. All comments submitted in response to DEQ's proposed action are included as appendix of this document.

2. PUBLIC COMMENT AND RESPONSES

Public comments regarding the permit analysis and air quality aspects of the proposed permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, DEQ's technical analysis, or the proposed permit are not addressed.

Comment 1:

The MACT Standards of Subpart BBBBBB-National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities were inadvertently omitted from the permit application and from the draft permit. This subpart should be included in the permit by reference. The effective date of the subpart is January 10, 2011.

Response:

DEQ revised the draft permit and included Subpart BBBBBB in the permit. The following are the permit conditions that are included to the draft permit:

Gasoline Distribution Bulk Terminal

40 CFR 63, Subpart BBBBBB – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities

- 2.18 The permittee shall comply with applicable requirements of 40 CFR 63 , Subpart BBBBBB upon the compliance date, as specified in 40 CFR 63.11083(b).
- 2.19 Prior to the compliance date of Subpart BBBBBB, the permittee shall submit a complete PTC application to include the 40 CFR 63, Subpart BBBBBB requirements that apply to the facility.

The statement of basis was revised accordingly to reflect the changes to the permit by adding a MACT applicability (40 CFR 63), Subpart BBBBBB to the document.

Comment 2:

A comment was submitted by the Idaho Conservation League at which the ICL is concerned about the large amount of VOC emissions associated with the facility in light of its location near a school and hospital. The ICL requests from DEQ to consider location of schools and hospitals when reviewing permit applications for VOC emissions sources such as Chevron to protect sensitive populations such as children and the ill, and requests that fugitive emissions should be minimized and regulated.

Response:

This Tier I operating permit has been developed in accordance with the Rules for the Control of Air Pollution in Idaho (Rules) and applicable federal regulations. Where a source locates is not within DEQ's regulatory authority. That decision resides with the local planning and zoning officials. If an application meets all applicable state and federal laws, then the air permit must be issued by the local air quality permitting authority (DEQ).

Appendix

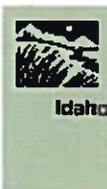
Public Comments Submitted for

Tier I Operating Permit

T1-050032

Name: Jim Robbins
Email Address: jimrobbins@chevron.com
Affiliation: Chevron

Comments: Harbi, as per our conversation, based on my review of Subpart BBBBBB it appears that this MACT applies to the Chevron Pipe Line Company/Northwest Terminalling Company, Boise Facility. This subpart was inadvertently, omitted from the draft permit application (T1-050032) and should be included by reference. Additionally, it appears that the effective date for the Boise Facility is January 10, 2011.



www.wildidaho.org

Idaho Conservation League
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Idaho Department of Environmental Quality
Harabi Elshafei
Air Quality Division
1410 North Hilton
Boise, Idaho 83706

October 22, 2008

RE: Idaho Conservation League Comments on proposed Tier I air quality permit renewal for Chevron Pipe Line Boise Terminal

Dear Mr. Elshafei:

Thank you for the opportunity to comment on the proposed Tier 1 air quality permit renewal for Chevron Pipe Line Boise Terminal. For thirty-four years, the Idaho Conservation League has been Idaho's voice for clean water, clean air, and wilderness—values that are the foundation to Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through citizen action, public education, and professional advocacy. As Idaho's largest state-based conservation organization we represent over 9,500 members, many of whom have a deep personal interest in protecting air quality.

The Idaho Conservation League is please to note that the Department of Environmental Quality has issued a renewal of the 2003 Tier 1 permit for the Chevron facility in Boise. However, we are concerned about the large volatile organic compound (VOC) emissions associated with this facility in light of its location near a school and hospital. Children and hospital patients are most sensitive to pollution that irritates the lungs and eyes.

DEQ should consider the location of schools and hospitals when reviewing permit applications for large emission sources such as the Chevron Pipe Line Boise Terminal. To protect sensitive populations such as children and the ill, fugitive emissions should be minimized and regulated. If you have any comments or questions, please contact me at (208) 345-6942 ex 23, or as scohn@wildidaho.org.

Sincerely,

Sara Cohn, Community Conservation Associate