

STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

Notice of Availability of Draft Notice of Construction and Draft Prevention of Significant Deterioration (NOC/PSD) Permit No. EFSEC/2002-01, Amendment 1 for Public Comment; **Notice of Public Comment Period: March 2, 2007 to April 6, 2007; Notice of Public Hearing: April 3, 2007, Blaine, Washington**

PROJECT DESCRIPTION: On June 21, 2005, BP West Coast Products, LLC, (BP) was issued a Notice of Construction/Prevention of Significant Deterioration (NOC/PSD) air emissions permit (Permit NO. EFSEC/2002-01) for the proposed 720 megawatt BP Cherry Point Cogeneration Project (Project) located in Whatcom County approximately 6 miles (9.6 km) northwest of Ferndale and 7 miles (11 km) southeast of Blaine, Washington.

In June 2006, BP requested an application amendment changing the design of the Project to initially construct two of the three permitted turbines to produce 520 to 570 megawatts (MW) using two GE 7FA or two Siemens SGT6-5000 combustion turbines rather than the original 720 MW three GE 7FA combustion Turbines. With the 520 MW project there would be only two HRSGs but an increase in steam to the refinery from 770,000 lbs. per hour maximum to 1,200,000 lbs. per hour maximum (510,000 lbs. per hour average). Duct burner maximum firing rate would change from 315 MMBTU/Hr total (105 MMBtu/hr. each) to 900-1,200 MMBtu/hr. total (450-600MMBtu/hr. each). Other components would remain the same.

PRELIMINARY DETERMINATION: Draft PSD and NOC permits and technical support document (fact sheet) have been prepared for Amendment 1 and are being issued for Council and public consideration. This notice serves as the Council's official notification that draft amendment to the PSD/NOC permit has been issued, and is available for public inspection and comment. It also serves as notice that members of the public and interested parties have an opportunity to submit written comments to the Council on the draft amendment to the PSD/NOC permit. The Project is subject to permitting requirements under the federal requirements of 40 CFR 52.21 for emissions of nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), sulfuric acid mist (H₂SO₄), particulate matter (PM), particulate matter less than 10 micrometers (PM₁₀), and volatile organic compounds (VOC). The Project is also subject to emission limitation, monitoring and reporting requirements of New Source Performance Standards (NSPS) 40 CFR 60 Subpart KKKK, 40 CFR 60 Subpart GG, Chapter 173-400 WAC, 40 CFR 60 Appendices A, B, and F, and 40 CFR 75; and to gas fuel monitoring requirements under 40 CFR 60 Subpart KKKK and 40 CFR Part 75 Appendix D. Ammonia (NH₃) emissions from the Project are subject to permitting under the requirements of WAC 463-78-005(1) and 005(4), which adopt Chapters 173-400 and 173-460 WAC respectively.

After reviewing the NOC/PSD amendment application, the accompanying BACT evaluation, and additional supporting evaluations submitted by BP West Coast Products, LLC, the Council's permit writer has made a preliminary determination that all requirements for PSD, New Source Review, and NOC are satisfied, and that if the draft approval of the permit amendment was approved, the emission units would comply with all applicable federal and state new source performance standards. BACT as required under 40 CFR 52.21(j) and WAC 173-400-113 (2) and toxic best available control technology (T-BACT) as required under WAC 173-460-040 (4) would be used for the control of all air pollutants which would be emitted by the proposed Project. Turbine BACT control technology would consist of: use of an oxidation catalyst plus lean premix turbine burners for control of CO and VOCs; use of natural gas fuel and good combustion practice for control of PM/PM₁₀, SO₂ and sulfuric acid mist; Selective Catalytic Reduction (SCR) plus lean premix dry low NO_x turbine burners and low NO_x duct burners for the control of NO_x; and limitation of ammonia emission rate to 5 parts per million (ppm) averaged

over 24 hours. BACT for the emergency generator and firewater pump engines would require that the engine be new and meet the 40 CFR 89 federal engine standards for the year of engine purchase, use of diesel fuel that meets the sulfur content specification of on road diesel fuel at the time of fuel purchase, and operation of no more than 250 hours per year for each unit. BACT for the cooling tower would require installation of a demister guaranteed to have a drift loss of 0.0005% or less of the recirculating water flow rate.

ENVIRONMENTAL IMPACT: The Council's permit writer has determined that allowable emissions from the proposed emission units, in conjunction with all other applicable emission increases or reductions (including secondary emissions) would not cause or contribute to violation of any ambient air quality standard or any applicable maximum allowable increase (PSD increment) over the baseline concentration in any area. Ambient Impact Analysis indicates the Project will have no adverse impact from pollutant deposition on soils and vegetation in the following Class I areas: the North Cascades National Park, the Glacier Peak Wilderness Area, the Pasayten Wilderness Area, and the Alpine Lakes Wilderness Area. The Federal Land Managers use a 5% visibility impact as their threshold for possible concern. A 6% visibility impact was predicted for the Olympic National Park on one day per year. The National Park Service considered this acceptable. Ambient Air Quality modeling indicates that projected concentrations of pollutants will be below levels that require further impacts analysis or air monitoring. Ozone modeling indicates that the maximum increased impacts expected would range from 0.2 to 0.6 parts per billion (ppb). This was determined to be acceptable by both Ecology and EPA. Use of cogeneration steam is expected to result in emissions reductions at the refinery. These refinery emissions reductions were not relied upon for the cogeneration power plant's emissions impacts analysis or emissions permitting. The emissions of toxic air pollutants from this facility will not exceed any acceptable source impact level (ASIL) established under WAC 173-460-150 or 160.

PUBLIC COMMENT: The Draft Approval of PSD/NOC Permit No. EFSEC/2002-01 Amendment 1 and the corresponding technical support document (a supplement to the permit to provide more detailed information) are available for review during the public comment period at the following locations:

- Washington State Library, Joel M. Pritchard Library, Point Plaza East, 6880 Capitol Blvd, Tumwater, WA, 98504-2460, (360) 704-5200
- Washington State Department of Ecology, 300 Desmond Drive, Lacey, Washington, 98503, Please contact Robert Burmark at (360) 407-6812
- White Rock Public Library, 15342 Buena Vista Avenue, White Rock, BC V4B 1Y6 Canada
- Whatcom County Library, P.O. Box 1209, Ferndale, WA 98248
- Bellingham Library, 210 Central Avenue, Bellingham, WA 98225-4421
- Semiahmoo Library, #200 1815 152 Street, Surrey, BC V4A 9Y9 Canada
- Whatcom County Library, 610 Third Street, Blaine, WA 98230

Copies of the documents will also be mailed to persons or agencies upon request.

The public comment period will extend from March 2, 2007 through April 6, 2007. Interested persons may review the documents and submit written comments regarding the proposed permit to: Allen Fiksdal, EFSEC, PO Box 43172, Olympia, WA 98504-3172, or by e-mail to efsec@cted.wa.gov. **Written comments must be postmarked no later than April 6, 2007.** EFSEC requests that comments not be sent by fax. EFSEC will also accept written comments submitted in person at the April 3, 2007, public hearing (see below).

All persons, including the applicant, who believe any condition of this draft permit amendment are inappropriate must raise all reasonably ascertainable issues and submit all reasonably available arguments supporting their position in writing by the end of the comment

period. Any supporting materials which are submitted must be included in full and may not be incorporated by reference, unless they are already part of the administrative record for this proposed approval or are generally available reference material.

A final determination on this PSD/NOC permit amendment approval will not be made until after the public comment period, and until all comments received pursuant to this notice have been considered. Once the final determination is made on this PSD/NOC permit amendment approval, a copy of the Council's final determination regarding the proposed amendment will be filed for review at the locations above. Within 30 calendar days after the final decision has been issued, any person who commented on the draft approval may petition the EPA Administrator, under 40 CFR 124.19, to review any condition of the decision. Any person who failed to file comments or failed to participate in the public hearing on the draft may petition for administrative review only to the extent of the changes from the draft to the final approved decision.

PUBLIC HEARING: A public hearing on this matter will be held at the following date, time and location: **Tuesday April 3, 2007 – Starting at 6:30 PM**, Blaine Performing Arts Center, 975 H Street, Blaine, Washington, 98230.

ADDITIONAL INFORMATION: More specific information about the Project is available from EFSEC's office or from reviewing the application at the public libraries listed above. Information regarding the Project is also on EFSEC's Internet site at: <http://www.efsec.wa.gov>. Please bring this Notice to the attention of persons who you know would be interested in this matter. For more information, or if you have special accommodation needs, contact Stephen Posner at 360/956-2063.

Dated: February 27, 2007, By: Allen J. Fiksdal, EFSEC Manager, PO Box 43172, Olympia, Washington 98504-3172