

	STATEMENT OF BASIS Page 1 of 1 BAQ Engineering Services Division 2600 Bull Street, Columbia, SC 29201 Phone: 803-898-4123 Fax: 803-898-4079
Company Name: BP Amoco – Cooper River Plant Permit Number: TV-0420-0029	Permit Writer: Jennifer L. Shaltanis/Tracey Stewart Date: August 7, 2009

DATE APPLICATION RECEIVED: March 12, 2008 & July 28, 2008
DATE OF LAST INSPECTION: July 18, 2007 (comprehensive, no violations)

FACILITY DESCRIPTION

The BP Amoco Chemical Company- Cooper River Plant is owned and operated by BP America Inc. BP is located on a 6,000-acre site in Berkeley County, South Carolina on the east bank of the Cooper River. The plant has been in operation since October 1978 and runs two shifts continuously.

The BP Cooper River (CR) plant falls under the SIC Code 2869. The plant produces only Purified Terephthalic Acid (see Title V greensheet VG, dated 6-26-2007, for more information). The BP CR plant is a major stationary source for SO₂, NO_x, CO, PM/PM₁₀, VOC and Aggregate HAP.

PROJECT DESCRIPTION

This project is both a minor and significant modification to the Title V operating permit. The facility originally requested three minor changes. During that modification, several additional issues were raised. That minor modification was stopped, to receive these subsequent requests, and all will be rolled into one major modification. The facility requests the following changes:

- 1) plant manager name (formerly Michael Olbrich, now Mark Fitts) and Mark Berlinger is no longer the environmental contact; it has been updated to Brent Pace
- 2) typos – correct CO and VOC emission limits in condition 5.E.4 (they are correct in the summary table 5.19); correct 5.C and 5.D header (see below for grammar, editing, and miscellaneous)
- 3) add wording to condition 5.E.5 to state “limit incorporates all VOC limits from previous construction permits”
- 4) revise condition 5.E.6 to reflect compliance with HON requirement
- 5) add wording to condition 6.B.1, which increases number of readings taken per day (an average would be used in lieu of a single daily reading); additional wording is as follows:
 “However, more than one reading may be taken in a 24-hour period (during a time that the process or emission generating equipment was operating) and all readings taken in the 24-hour period shall be averaged together for a daily reading for comparison to an established parameter.”

The significant modification covers relaxing monitoring for the exiting High Pressure Vent Gas Treatment System CR#1 so that actual temperature ranges are removed from Table 6.1 and Condition 6.B.21 and replaced with monitoring language that states source test data will be used to establish approved operational ranges for CR#1.

The modifications do not call for changes in emissions. Also, a new regulatory review is not needed as no new regulatory requirements are triggered by these changes.

SPECIAL CONDITIONS, MONITORING, LIMITS

Please see TV greensheet by VG, dated 6-26-2007.

PUBLIC NOTICE

Since monitoring for CR#1 is being relaxed, the significant modification will be public noticed.