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July 30, 2003

AUG 4 2003

VIA CERTIFIED MAIL RETURN
RECEIPT REQUESTED
AND BY FACSIMILE

STATE OF ILLINOIS
Pollution Control Board

Pollution Control Board
Attn: Clerk
100 West Randolph Street
James R. Thompson Center
Suite 11-500
Chicago, Illinois 60601-3218

Bryan Cave LLP
One Metropolitan Square
211 North Broadway
Suite 3600
St. Louis, MO 63102-2750
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Re: Koch Pipeline Company, L.P. – Hartford Terminal, Lifetime Operating Permit Application Number 83100026, Initial Permit Issuance I.D. No. 119821AAH, issued June 27, 2003

Hong Kong
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Kansas City
Kuwait
Los Angeles
New York
Phoenix
Riyadh
Shanghai
St. Louis
United Arab Emirates
Abu Dhabi
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To Whom it May Concern:

Pursuant to 415 ILCS 5/40(a)(1) and Ill. Admin. Code tit. 35, § 105.208, Koch Pipeline Company, L.P. ("Koch") requests a ninety (90) day extension of the 35-day period for requesting an appeal of the issuance of its Lifetime Operating Permit – NPS Source ("Permit") issued on June 27, 2003. The current period for petitioning for appeal expires on August 1, 2003.

Koch and IEPA are requesting an extension of the appeal period on the grounds that IEPA will likely not complete its reissuance of the Permit prior to August 1. Koch has requested IEPA to reissue the Permit for the reasons set forth in the attached correspondence from Koch to Eric Jones, the Permit writer.

I certify that on July 25, 2003, I spoke with Robb Layman, Esq., Special Assistant Attorney General before the Pollution Control Board, Division of Legal Counsel, IEPA, who agreed to the request for a 90-day extension.

Sincerely,

Christopher E. Erker

In Association With
Bryan Cave (Illinois)
Chicago

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Enclosure

Pollution Control Board
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Bryan Cave LLP

cc: Robb Layman
Mark McMahon, Koch Pipeline Company



KOCH PIPELINE COMPANY LP

July 8, 2003

Mr. Eric Jones
Permit Section
Division of Air Pollution Control
Illinois Environmental Protection Agency
P.O. Box 19506
Springfield, Illinois 62794-9506

Re: Koch Pipeline Company, L.P. - Hartford Terminal
Application Number 83100026

Dear Mr. Jones:

As a follow-up to our telephone conversation today regarding the above-referenced permit application, attached are Koch Pipeline Company, L.P.'s ("KPL") proposed revisions to the lifetime operating permit for KPL's Hartford Terminal.

To summarize our discussion, the following revisions were proposed by KPL:

- The gallon/month throughput limit in Paragraph 5 should be changed to 137,000,000 gallons/month since the number IEPA used in the permit was the average of only one tank (of which there are four), but the permit showed it as a facility-wide limit for routine material storage.
- Paragraph 6 should be amended since VOM emissions from fugitive losses, meter proving, maintenance activities, tank cleaning and filters may well exceed 4 tons per year. We propose amending this amount to 12 tons. This would accommodate fugitive losses as well as potential maintenance activities that may be required in the future (i.e. multiple tank emptying and refills within a year due to expected/unexpected outages driven by inspections, seal damage, maintenance, etc.)
- We request HAP limits be changed to 10 tons/year of a single HAP and 25 tons/year of any combination of such HAPs to be consistent with the federal major HAP source thresholds.

Per our discussion, you agreed to the 137,000,000 gallons/month throughput limit and an increase in the fugitive loss limit of paragraph 6 given an explanation of potential emission producing activities as stated above.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me at (651) 437-0902.

Sincerely,

Mark McMahon
Compliance Manager