UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

MAY 21 2015

**URGENT LEGAL MATTER**
**REQUIRES PROMPT RESPONSE**

**CERTIFIED MAIL**
**RETURN RECEIPT REQUESTED**

Brent Baker, Chief Executive Officer
Bridgeport Biodiesel, LLC
146 Andover Street
Bridgeport, CT 06605

Re: Clean Air Act Reporting Requirement

Dear Mr. Baker:

The United States Environmental Protection Agency ("EPA") is evaluating whether Bridgeport Biodiesel, LLC, located at 146 Andover Street, Bridgeport, Connecticut ("Bridgeport Biodiesel") is in compliance with the Clean Air Act ("CAA" or "Act") and requirements promulgated under the Act.

Section 114(a)(1) of the Act, 42 U.S.C. Section 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required to enable EPA to determine whether such person is in compliance with the Act and its implementing regulations.

This reporting requirement orders Bridgeport Biodiesel to provide the information listed in each numbered paragraph below within 30 days of receipt of this letter. If Bridgeport Biodiesel does not possess some or all of the records or documents that respond to a specific request below, explain why.

1. Provide the date Bridgeport Biodiesel commenced construction at 146 Andover Street Bridgeport, CT (the date a continuous program of construction was undertaken, or the date a contractual obligation for such a program was entered into).
2. Provide the date Bridgeport Biodiesel first produced biodiesel at 146 Andover Street Bridgeport, CT.

3. Describe the current ownership and corporate structure of Bridgeport Biodiesel:
   a. List any partners or corporate officers; and
   b. List any parent and subsidiary corporations.

4. Provide date the current ownership took control of Bridgeport Biodiesel.

5. Provide a description of each storage tank (including any waste wash water tank) used to store organic material at the facility, including:
   a. Tank storage capacity (in gallons);
   b. Tank type (e.g. vertical fixed roof);
   c. Type of material the tank is made of;
   d. Materials stored in the tank. Include the methanol concentration of the materials;
   e. The maximum true vapor pressure of materials stored in the tank (in kilopascals). Include the temperature used in the determination;
   f. Method of loading and unloading the tank;
   g. Any controls used to reduce tank emissions. Include the removal efficiency of the controls and the date any media in the controls was last replaced;
   h. Types of vents on the tank. Include the vent pressure settings; and
   i. The date vents and vent pressure settings were last tested.

6. Provide a block diagram describing the production process and flow of materials through the process. Also provide a description of each piece of equipment in the process, including:
   a. A physical description of the equipment;
   b. An explanation of how the equipment is used (include processing and liquid transfer times);
   c. The capacity of the equipment (in gallons);
   d. The maximum throughput of the equipment (e.g. in gallons/hour or batches/hour);
   e. The temperature the material in the equipment is heated to;
   f. The concentration and partial pressure of methanol in the equipment;
   g. Any controls used to reduce emissions. Include the removal efficiency of the controls and the date any media in the controls was last replaced;
   h. Types of vents on the equipment. Include the vent pressure settings. If equipment is open to the atmosphere for any period of time, indicate when this occurs; and
   i. The date vents and vent pressure settings were last tested.

7. Provide the maximum annual biodiesel production capacity (in gallons/year). Include the method of calculation.

8. Provide the largest batch size of biodiesel able to be processed at the facility (in gallons of oil or gallons of biodiesel). Include:
   a. The time it would take to complete the batch; and
   b. The number of batches that can be concurrently run.

9. Provide the average ratio of materials used in a production batch described as:
   a. The ratio of methanol to oil and sulfuric acid to oil added during acid esterification;
   b. The ratio of methanol to oil and sodium methoxide (or other catalyst) to oil added during transesterification;
   c. The gallons of glycerin produced per gallon of biodiesel;
   d. The gallons of oil feedstock used per gallon of biodiesel; and
   e. The gallons of waste wash water produced per gallon of biodiesel.

10. Provide the average free fatty acid concentration of the used oil feedstock.

11. Provide a description of any process limitations on production rate or throughput, including the resulting maximum rate of flow of materials (e.g. in gallons/hour or batches/hour).

12. Provide the following information about Bridgeport Biodiesel's potential-to-emit ("PTE") methanol. Specifically, provide the annual PTE methanol (in tons per year) from:
   a. **Loading racks**. Include all data and all AP-42 factors used (e.g. EPA AP-42, Volume I, Fifth Edition, Section 5.2.2.1.1[1]), and the actual calculations performed. Indicate if methanol emissions from the unloading of sodium methoxide are included in the calculation;
   b. **Storage tanks**. Include all data and all AP-42 factors used (e.g. EPA AP-42, Volume I, Fifth Edition, Section 7.1[2]), and actual calculations performed. Indicate if methanol working and breathing emissions from sodium methoxide, wet glycerin and waste wash water tanks are included in the calculation;
   c. **Process vents and open process reactors**. Include all data and methodology used (e.g. the methodology described in 40 C.F.R. § 63.1257(d)(2)(i)), and actual calculations performed. Indicate which process components are included in the calculation; and
   d. **Fugitive sources**. Include all data and methodology used (e.g. the methodology described in EPA publication EPA-453/R-95-017[2]), and actual calculations performed. Indicate if emissions from all valves, pump seals, compressor seals, pressure relief valves, connectors, open ended lines and sampling connections were included in the calculation. Also indicate whether the valves, pump seals, compressor seals, pressure relief valves, connectors, open ended lines and sampling connections are in gas, light liquid, or heavy liquid service, and the method used to make this determination.

13. If a leak detection and repair program for equipment in volatile organic compound service is in place at the facility, provide a description of the program.

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[1] Found at http://www.epa.gov/ttnchie1/ap42/
[2] Found at http://www.epa.gov/ttn/chief/efdocs/equiplks.pdf

Submissions required by this letter shall be mailed to:

Susan Studlien, Director
Office of Environmental Stewardship
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
Attn: Darren Fortescue (OES 04-2)

Be aware that if Bridgeport Biodiesel does not provide the information in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

Bridgeport Biodiesel may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R §2.203(b). Information subject to such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 C.F.R. Part 2, Subpart B. Note that certain categories of information, such as emissions data, are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Bridgeport Biodiesel. Please be aware that states may have different rules and regulations governing the protection of confidential business information.

If you have any questions regarding this reporting requirement, please contact Darren Fortescue, Environmental Engineer, at (617) 918-1162, or have your attorney call Tom Olivier, Senior Enforcement Counsel, at (617) 918-1737.

Sincerely,

Susan Studlien

Susan Studlien, Director
Office of Environmental Stewardship

cc: Robert Girard, CT DEEP