UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202 – 2733

September 11, 2018

Ms. Denise Rogers, Compliance Manager
Texas Gulf Terminals Inc.
1401 McKinney, Suite 1500
Houston, TX 77010

RE: Title V, 40 CFR Part 71, Air Permit Application Completeness Determination for Texas Gulf Terminals Inc.

Dear Ms. Rogers:

EPA has reviewed your application, received by EPA on July 13, 2018, for an initial part 71 Title V operating permit (Title V application) for the Texas Gulf Terminals Inc. (TGTI) crude export facility. We have determined that your Title V application is incomplete at this time. According to 40 CFR 71.7(a)(3), EPA is required to ensure that priority is given to applications such as a Prevention of Significant Deterioration (PSD) permit application or the Section 112(g) Case-By-Case Maximum Available Control Technology (MACT) determination request that are submitted under Title I of the Clean Air Act (CAA). On August 10, 2018 and August 27, 2018, EPA determined your PSD permit application and your MACT determination request, respectively, were incomplete, and sent you incompleteness letters requesting additional information. Based on these previous incomplete determinations and our review of your Title V permit application, we have determined that the Title V permit application is also incomplete at this time since the terms and conditions from the PSD permit and a prospective case-by-case MACT determination would comprise the specific conditions we would include in a Title V operating permit. As you are aware, TGTI is currently in the process of providing additional technical information and documentation in response to our incompleteness letters for the PSD permit application and the Section 112(g) Case-By-Case MACT determination. We anticipate when those two applications are determined to be complete we will consider the Title V operating permit application complete as well.

If you have any questions concerning our questions or the information we are requesting, please feel free to contact myself at (214) 665-6435 or Melanie Magee of my staff at (214) 665-7161.

Sincerely,

9/11/2018

X Jeffery J. Robinson

Jeffrey Robinson

Signed by: JEFFERY ROBINSON
Air Permits Section Chief

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Enclosure

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