UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

April 28, 2020

Jenni C. Melder
EHS Manager, Galena Park Splitter
Kinder Morgan Crude & Condensate LLC
407 Clinton Dr.
Galena Park, TX 77547

Sent by email: jennifer_melder@kindermorgan.com

Re: Alternative Monitoring Plan (AMP) – New Source Performance Standards (NSPS) Subpart Ja – Span Gas Concentration for Nitrogen Oxides (NO_x) Continuous Emission Monitoring System (CEMS) at Kinder Morgan Crude & Condensate LLC (Kinder Morgan), Galena Park Splitter, Galena Park, Texas.

Dear Ms. Melder:

This letter is in response to your Alternative Monitoring Plan (AMP) request dated December 3, 2019, regarding the requirements of NO_x span gas used during continuous emission monitoring system (CEMS) audits for process heaters under NSPS Subpart Ja. Based upon the information provided, the United States Environmental Protection Agency (EPA) approves your request, as explained below.

Under NSPS Subpart Ja, CEMS for process heaters are subject to the monitoring requirements of 40 C.F.R. § 60.107a(c), process heaters complying with the NO_x concentration-based limit. According to 40 C.F.R. § 60.107a(c)(1), the owner or operator shall install, operate and maintain each NO_x monitor according to Performance Specification 2 of Appendix B to Part 60. The span value of this NO_x monitor must be between 2 and 3 times the applicable emissions limit, inclusive.

Kinder Morgan operates two forced draft process heaters at the Galena Park Splitter and elected to comply with the NO_x emission limit of 60 ppmvd in accordance with 40 C.F.R. §60.102a(g)(2)(ii)(A), which requires span gas concentration of 120 -180 ppmvd. Kinder Morgan has installed selective catalytic reduction units on both heaters and monitors NO_x emissions with CEMS. However, Kinder Morgan's CEMS analyzers at the Galena Park Splitter have a span of 100 ppmvd. Kinder Morgan is requesting that the span value of the NO_x CEMS for the two process heaters at the Galena Park Splitter should be set to 100 ppmvd instead of 120 -180 ppmvd required under NSPS Ja.

Kinder Morgan provided NO_x emission monitoring information for January 2017 through September 2019 that shows that NO_x emissions were well below the 60 ppmvd requirement. The information provided demonstrates that a 100 ppmvd NO_x span gas will be adequate to operate and maintain the CEMS as required in 40 C.F.R. § 60.107a(c)(1).

Based on the information provided, EPA approves your request to use a 100 ppmvd span gas for the two-process heater CEMS at the Galena Park Splitter, provided that all other requirements of the monitoring procedures of NSPS Subpart Ja for NO_x and O_2 are followed.

This approval is site specific for the Kinder Morgan Galena Park Splitter. If operations change from representations made in your request that will impact NO_x emissions at the two process heaters, then Kinder Morgan must document the change(s) and submit a new AMP request. This approval should also be incorporated into the facility's New Source Review (NSR) and Title V permits for federal enforceability. This response has been coordinated with EPA's Office of Enforcement and Compliance Assurance (OECA) and EPA's Office of Air Quality Planning and Standards (OAQPS). If you have any questions or concerns about this approval, please contact Prince Nfodzo of my staff at (214) 665-7491 or nfodzo.prince@epa.gov.

Sincerely,

STEVEN THOMPSON

Digitally signed by STEVEN THOMPSON
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Date: 2020.04.28 15:48:43 -05'00'

Steve Thompson
Chief,
Air Enforcement Branch

cc: Michael De La Cruz, TCEQ, michael.delacruz@tceq.texas.gov
Maria Malave (OECA), Malave.Maria@epa.gov
Brenda Shine (OAQPS), Shine.Brenda@epa.gov