To: Magee, Melanie[Magee.Melanie@epa.gov]
From: Robinson, Jeffrey
Sent: Thur 3/15/2018 2:40:51 PM
Subject: RE: Other Subpart Y Reporting Facilities

Suggestion…..it might be worth calling Brian Burdorf, Trinity Consultants, to ask if they have an HAP emission estimate yet for the project. If so, ask him how closely they've looked at Part 63 – Subpart Y applicability for the project.

From: Magee, Melanie
Sent: Thursday, March 15, 2018 9:22 AM
To: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>
Subject: RE: Other Subpart Y Reporting Facilities

LOOP Modification: 12 VLCC = 24,000,000 Barrels/yr = 423 TPY or 554 TPY VOC

So,

Unnamed Project: 200,000,000 Barrels/yr = 4,617 TPY VOC (calculation estimate based on ratio)

Estimating for R2,

R2 Project: 150,000,000 Barrels/yr = 3,463 TPY VOC (calculation estimate based on ratio)

Maybe Bonnie quickly knows a good estimate percentage (rule of thumb) of HAP emissions in crude oil? But even if a small percentage of HAP based on the VOC calculations would quickly get the project over 10/25 tpy. I suspect this is why the unnamed company is asking.

From: Robinson, Jeffrey
Sent: Thursday, March 15, 2018 9:07 AM
To: Magee, Melanie <Magee.Melanie@epa.gov>
Subject: RE: Other Subpart Y Reporting Facilities

Do you think the application we receive will project VOC emissions above 2000 TPY.

From: Magee, Melanie
Sent: Thursday, March 15, 2018 9:02 AM
To: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>
Subject: RE: Other Subpart Y Reporting Facilities

No. However, LOOP submitted to USCG in the DWP License review that for 12 VLCC loaded per year the loading loss VOC emissions are 423.54 TPY for a crude oil vapor pressure of 2.6 psia and 554.64 TPY for a crude oil vapor pressure of 6.514 psia. The calculations are based on AP-42 Section 5.2 Transportation and Marketing of Petroleum Liquids.

From: Robinson, Jeffrey
Sent: Thursday, March 15, 2018 8:50 AM
To: Magee, Melanie <Magee.Melanie@epa.gov>
Subject: RE: Other Subpart Y Reporting Facilities

Did the "yet to be named company" give us an indication or estimate of their VOC emissions in TPY?

From: Magee, Melanie
Sent: Thursday, March 15, 2018 8:21 AM
To: Robinson, Jeffrey <Robinson.Jeffrey@epa.gov>
Subject: Other Subpart Y Reporting Facilities

If you think Dave needs copies of the other permits that report under the Subpart Y NESHAP let me – or Aimee know. In Webfire, the only facilities I noted that were reporting under Subpart Y are (maybe the list changes as reports are received?):

Magellan Terminal Holdings, Pasadena Terminal. Requires LAER for Fugitive Crude Oil Loading. Permit numbers N254, 142261

Martin Operating Partnership, Corpus Christi Terminal. Permit numbers 103976, PSDTX1406

LBC Houston, Bayport Terminal. Permit numbers 123325, N206

Nustar Logistics, Corpus Christi. Permit Numbers 32769, PSDTX1258M1 and O-1238

Melanie Magee

Environmental Engineer

Air Permits Section (6MM-AP)

U.S. Environmental Protection Agency, Region 6

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