

US EPA ARCHIVE DOCUMENT

LeDoux, Erica

From: LeDoux, Erica
Sent: Friday, July 26, 2013 3:30 PM
To: 'Benton, Christopher'; 'Bergmann, Edwin'
Cc: Robinson, Jeffrey; Magee, Melanie
Subject: Enterprise Mont Belvieu PDH Unit Request for Additional Information on July 26, 2013

Chris and Ed,

Thank you for Enterprise's Mont Belvieu Complex responses to the GHG Application Determination Letter for the Propane Dehydrogenation (PDH) Unit submitted June 21, 2013 and the follow-up information resulting from the July 2, 2013 meeting that was submitted July 15, 2013. This email is to summarize the additional information that EPA requested during the conference call held today, July 26, 2013. Please provide a written response to the following:

- 1) In addition to the proposed combustion cap for the combustion units, please propose an output-based, or combination output- and input-based limit or efficiency-based BACT limit for the following emission sources:
 - Reactor Charge Heater EPN: HR 15.101
 - Waste Heat Boiler EPN: DW37.101 (The vents directed to the WHB include Regeneration Heater, Regeneration Air Compressor Gas Turbine A/B, VOC from Reactors, Coke Burn, and WHB Duct Burners)
 - Auxiliary Boilers EPN: BO10.103A and BO10.103B

Please include the actual supporting calculations and the basis for the rationale used to derive the proposed limits. In the case of the propose limit for the WHB, please provide an explanation how each vent stream directed to the WHB is apportioned to the proposed limit.

- 2) Please provide benchmark data that compares the design selection for the Reactor Charge Heater, WHB, Regeneration Heater, Regeneration Air Compressor Gas Turbine, Auxiliary Boilers to similar or existing sources (nationally or internationally) and/or efficiency. It is suggested that Enterprise includes the details to the evaluation performed in the design decisions that are specific and unique to the plant operation (e.g., fuel gas characteristics).
- 3) Please expand on the process description given on page 5.1 of the permit application for "Combustion Units" pertaining to how emission rates were calculated.
- 4) In comparing another PDH permit application with Enterprise, a noted difference was the inclusion of a CO₂ removal system for the CO₂ present in the process gas. The other PDH unit has a absorption process for sour gas removal which selectively removes CO₂ from the process gas. Does Enterprise also have a similar CO₂ removal system for CO₂ in the process gas? If not, please explain.

Thank you,

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