

US EPA ARCHIVE DOCUMENT

Enterprise Products, LLC
Propane Dehydrogenation Unit, Mont Belvieu, Texas
Prevention of Significant Deterioration Permit for Greenhouse Gas Emissions
PSD-TX-1336-GHG

Responses to Public Comments

U.S. Environmental Protection Agency
April 14, 2014

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I. Summary of the Formal Public Participation Process

The U.S. Environmental Protection Agency, Region 6 (EPA) proposed to issue a Prevention of Significant Deterioration (PSD) permit to Enterprise Products, LLC, Mont Belvieu, Chambers County, Texas for construction of a new, greenfield Propane Dehydrogenation Unit on March 7, 2014. The public comment period on the draft permit began March 7, 2014 and closed on April 7, 2014. EPA announced the public comment period through a public notice published in *The Baytown Sun* on March 7, 2014 and on Region 6's website. EPA also notified agencies and municipalities on March 6, 2014 in accordance with 40 CFR Part 124.

The Administrative Record for the draft permit was made available at EPA Region 6's office. EPA also made the draft permit, Statement of Basis and other supporting documentation available on Region 6's website, and available for viewing at the West Chambers Branch Library in Mont Belvieu, TX.

EPA's public notice for the draft permit also provided the public with notice of the public hearing. The public notice stated that "Any requests for a public hearing must be received by the EPA either by email or mail by April 1, 2014, and must state the nature of the issues proposed to be raised in the hearing...EPA has the right to cancel a public hearing if no request for a public hearing is received by April 1, 2014, or the EPA determines that there is not a significant interest. If the hearing is cancelled, EPA will post an announcement of the cancellation by April 4, 2014 on the EPA's Website <http://yosemite.epa.gov/r6/Apermit.nsf/AirP>. Individuals may also call the EPA at the contact number listed above to determine if the public hearing has been cancelled." During the comment period, EPA received no requests for a hearing. EPA Region 6 cancelled the scheduled public hearing and posted notice of the decision on the EPA Region 6 website mentioned above on April 4, 2014. EPA received one public comment on the proposed permitting action via email on April 7, 2014. The content of that comment and EPA's response are discussed in section II below.

II. EPA's Response to Public Comments

This section summarizes the public comments received by EPA and provides our responses to the comments. EPA received one comment via email on April 7, 2014.

Comment: "Why is Enterprise being allowed to install a highly polluting technology for PDH when there is lesser polluting (lower GHG's and no toxic Chrome catalyst) technology available?" The commenter questions EPA's decisions to allow the use of a specific technology that he contends is more polluting than other available methods of propylene production. The commenter does not specify a technology against which EPA should compare the company's proposal.

Response:

The commenter expresses concern with the company's choice of technology to manufacture propylene at the proposed plant; however, he does not bring to EPA's attention any specific technology or set of technologies that would result in lower greenhouse gas (GHG) emissions. Therefore, we are not able to make a side-by-side comparison of the commenter's preferred technology and the selected technology. However, our review of public information on other currently available technologies for propylene production did not result in a decision to deem one of these other technologies superior in terms of GHG emissions or efficiency. Evaluating best available control technology for pollutants other than GHGs is outside the scope of this permitting action

Our statement of basis, made available to the commenter at the time of public notice, discusses how the proposed permit for GHG emissions meets the applicable legal and technical requirements of the act.

The commenter also expresses concern with the company's selection of a technology that employs a "chrome catalyst." Other PDH catalysts use heavy metals such as platinum alumina based, platinum-tin based, and zinc-calcium aluminates. EPA considers environmental impacts in Step 4 of its BACT analysis, including the trade-offs between emissions of various pollutants resulting from the application of a specific control technique. The commenter does not provide a specific technology for EPA to consider alongside the selected technology. EPA lacks sufficient information to determine whether the commenter's preferred technology results in decreases in GHG emissions or increases in non-GHG emissions or other pollutants..

III. Revisions in Final Permit

No revisions were made to the draft permit before signature.

IV. National Historic Preservation Act (NHPA)

On March 6, 2014, EPA sent a letter to the State Historic Preservation Officer (SHPO) requesting concurrence on EPA findings for DCP's cultural survey. The SHPO provided concurrence to the EPA on April 3, 2014.