

US EPA ARCHIVE DOCUMENT



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

OCT 28 2011

Mr. Jeff Weiler
Environmental Manager
ETC Texas Pipeline Ltd.
800 E. Sonterra Blvd, Suite 400
San Antonio, Texas 78258

Subject: Prevention of Significant Deterioration Permit for Greenhouse Gas for ETC Texas Pipeline. Ltd

Dear Mr. Weiler:

This letter is in response to your application received in our office on August 25, 2011, for a Greenhouse Gas (GHG) Prevention of Significant Deterioration (PSD) permit. After our initial review of the above application and all supporting information, we have determined that additional information is required to begin the processing of the application. Enclosed is a list of the information required.

Upon receipt of the additional information, the Environmental Protection Agency (EPA) will prepare a completeness determination on the technical information of your application. This information is necessary for EPA to develop a Statement of basis and rationale for the terms and conditions for a draft permit. As we develop our preliminary determination, it may be necessary for EPA to request additional clarifying or supporting information. If the supporting information substantially changes the original scope of the permit application, an amendment or new application may be required.

Although not required as part of our completeness determination, EPA may not issue a permit without determining that there will be no effects on endangered species or until it has completed consultation under Section 7 of the Endangered Species Act. In addition, EPA must undergo consultation pursuant to Section 106 of the National Historic Preservation Act. To expedite these consultations, EPA requests that permit applicants provide a Biological Assessment and a cultural resources report covering the project and action area. So that EPA may issue a permit at the earliest possible time and within the timeframes required by statute, we request that you submit this information as early as possible in the process. We acknowledge that ETC has been designated as a non-federal representative for ESA as of September 15, 2011. We look forward to working with you during these processes.

If you have any questions concerning the review of your application, please contact Aimee Wilson of my staff at (214) 665-7596.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Edlund', with a long horizontal flourish extending to the right.

Carl E. Edlund, P.E.
Director
Multimedia Planning and
Permitting Division

cc: Mr. Steve Hagle, P.E., Deputy Director
Office of Permitting and Registration, TCEQ

Mr. Mike Wilson, P.E., Director
Air Permits Division, TCEQ

ENCLOSURE

EPA Comments on the ETC Texas Pipeline, Ltd Greenhouse Gas Permit Application

General

1. The permit application indicates that there is permit by rule TAC §106.352 for current equipment at the site. Please provide a brief explanation if there will be increased utilization resulting in emission increases as a result of this project. Please indicate which equipment may be permanently dismantled. Please provide EPA a copy of the current reported emissions from this permit.

BACT Analysis

2. The permit application indicates that ETC will utilize the “best available engineering design and with the latest available technology to ensure the best available energy efficiency for the Plant’s intended process”. Please provide performance benchmarking data or any other technical support information to support your conclusion. EPA notes that the application does detail the type of equipment and proposed technology for energy efficiency but does not have a comparative benchmark study to indicate other industry operating or designed units.
3. The application indicates that most of the CO₂ is from the amine units that cannot be captured. The application provides a five step BACT analyses for Carbon Capture and Storage (CCS) and transfer via pipeline and concludes that is not technically and economically viable (pg. 25). For the combustion and other equipment the BACT analyses is based on an efficient operation. It appears that the only possibility for reducing CH₄ is from fugitive emissions. The BACT analyses for fugitive emissions indicate that the TCEQ 28 VHP, LDAR program will be used, since the GHG emissions are a minor contribution of total GHG, (pg. 39). This program will reduce the emissions by 80-90%. However, the five-step BACT analyses requires the top control such as the TCEQ 28 LAER program with other possibilities of reducing fugitive emissions and leaks be considered. Did the BACT analysis consider 28 LAER as the highest control? Please further refine the BACT analyses for fugitive emissions.

Calculations

4. Calculations for GHG are in Appendix B. The Table on B-2 provides the estimate for GHG on a mass basis. It is not clear what the percentage of CH₄ or N₂O is in the stack gas. Please provide this information or reference an applicable section in the application.
5. Please provide the basis or reference for utilizing 59% CH₄ in the gas streams for the fugitive emission calculations on pg B-6.

6. Please provide detailed explanation of assumptions made in the emission calculations for waste gas to the flares, thermal oxidizers, amine units, and dehydrators . Also, indicate the formulas used in the calculations and the source of these formulas.

Impact Analysis

7. Section 52.21(o), Additional Impact Analyses, requires an applicant to provide an analysis of the impairment to the soils and vegetation that would occur as a result of the modification. Please provide the assessment you are providing to TCEQ. The current TCEQ application does not have the air quality analyses that may assist in such an analyses.

Monitoring

8. Page 30 of the application provides for monitoring of the GHG emissions from the project. However, the information provided in this section is very general and does not propose or contain details on the monitoring of the GHG emission limits. Please provide to EPA the methods/frequency of monitoring that ETC would propose.