

US EPA ARCHIVE DOCUMENT

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Subject: Question about MSS Activities, Domestic Crude Project GHG Permit
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Daren, As we discussed today, I would like some clarification about the Planned MSS Activities for use in the BACT analysis.

On Page 47 of the original permit application, FHR discusses the source of the emissions and some controls that are used to minimize the fugitive emissions such as engines, thermal oxidizer, and carbon canisters. On Page 83 and 84 of the original permit application, in the BACT discussion, FHR selects BACT as a number of upfront procedures including purging to a flare or flare gas recovery unit, but does not mention the other control devices.

Here is what I need:

- 1) Describe the emissions (both fugitive and non fugitive) and which activities they stem from.
- 2) What specifically are the control devices and which ones are portable?
- 3) Which emissions go to which control device (including the flares) and under what circumstances?
- 4) What can be done to minimize the fugitive emissions (which goes into the BACT discussion)?

Thanks. Please let me know if you have any questions.

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