

US EPA ARCHIVE DOCUMENT

Huser, Jennifer

From: Larry Moon <lmoon@zephyrenv.com>
Sent: Wednesday, May 14, 2014 3:15 PM
To: Huser, Jennifer
Cc: ksmith@coronado-ventures.com
Subject: RE: Pinecrest: question regarding TRB-MSS EPN

Jennifer,

That approach is acceptable to Coronado. It occurred to me that we have not updated the GHG emission calculations with the new Global Warming Potential factors. I will put that together and get it to you shortly.



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From: Huser, Jennifer [mailto:Huser.Jennifer@epa.gov]
Sent: Wednesday, May 14, 2014 11:14 AM
To: Larry Moon
Cc: ksmith@coronado-ventures.com
Subject: Pinecrest: question regarding TRB-MSS EPN

Hi Larry and Kathy,

In preparing the draft permit and SOB, a question has come up regarding the need to split out TRB-MSS emissions as a separate EPN. Based on the description, the emission source seems similar to natural gas fugitives. As such, would Pinecrest be amenable to including those emissions (2.2 tpy CO₂e) in the EPN NG-FUG, with a footnote explanation that the EPN NG-FUG includes emissions from fuel line shutdown/maintenance and small equipment/fugitive component repair or replacement? This would be similar to the rationale behind including CGT startup/shutdown maintenance in the emissions limit for the CTG EPNs with the explanation in the footnotes that the tpy annual emission limit includes emissions from MSS activities.

Please let me know at your earliest convenience if this would work for Pinecrest.

Thanks!

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