

US EPA ARCHIVE DOCUMENT

From: [Roberts, Melanie](#)
To: [Wilson, Aimee](#); [Keiser, Jessica](#)
Subject: RE: Targa Train 5 GHG PSD Permit
Date: Monday, November 04, 2013 9:01:05 AM
Attachments: [BACT TEG-Amine \(11-1-13\).pdf](#)
[Summary Emission Rates.pdf](#)
[RTO-5 Calcs.pdf](#)
[FLR-5 Startup Calcs.pdf](#)
[AU-4 to FLR-5 Calcs.pdf](#)
[MSS Calculations Explanation.pdf](#)
[DRAFT-GHG Permit Targa Mt Belvieu 110113 Targa.docx](#)
[MtBelvieu FINAL SOB 110113 Targa.docx](#)

Attached are the edited versions of the draft permit and Statement of Basis. I used track changes so you can see what was changed.

I've also attached the revised BACT write-up for the permit application splitting out the TEG and Amine units since their BACT analyses are not the same.

Finally, I've attached the revised pages from the emission calculation spreadsheets with the change from venting AU-4 during RTO downtime to show these emissions venting to the flare for 152 hours per year (instead of to atmosphere). I revised the RTO-5 emission calculations to remove the flash gas since this will normally be routed to the fuel system. I've also revised the startup spreadsheet to include flare emissions during startup from the Amine flash tank and still vent. This matches the process for the TEG unit as well. The attached sheets are the GHG Emission Summary, RTO-5 Calcs, AU-4 to FLR-5 Calcs, and Startup Emissions to Flare Calcs. I printed the full calculations for the RTO, AU-4 to FLR-5 and FLR-5 Startup so it includes GHG and criteria pollutants. The GHG section is after the criteria pollutant calculations.

I also responded to your comments below.

Please give me a call if you have any questions about any of the changes or my comments below.

Thank you,
Melanie Roberts

From: Wilson, Aimee [<mailto:Wilson.Aimee@epa.gov>]
Sent: Tuesday, October 29, 2013 1:37 PM
To: Keiser, Jessica; Roberts, Melanie
Subject: RE: Targa Train 5 GHG PSD Permit

I made revisions to both the draft permit and the SOB. Please review carefully. There are a couple of places where I have a comment bubble where I need some additional information, or need you to verify what I have. You will see that I have combined emissions for RTO and RTO MSS, and I combined all the flare related emissions. I prefer to have one limit for each emission unit. If you want them separate, please let me know.

Please feel free to make edits directly on the documents, just please use the tracked changes feature.

There were a few revisions that you requested that I did not do. The permit cover page cannot be changed. If we do not get comments on the permit, we will revise the language to state that the permit becomes effective immediately. If we get comments, that language does not change. Also – the oxygen monitoring requirement for the RTO has not been removed. We have required this in most of the permits for RTOs – including the Targa Longhorn permit.

Targa maintains that we do not believe monitoring the oxygen gives any information to indicate performance of the RTO. We did discuss this monitoring requirement with TCEQ combustion staff and they agreed that monitoring oxygen was not necessary for this type of RTO based on the information we provided from the vendor. However, we are not willing to hold up our permit going to public notice in order to save the money required to install this monitoring system.

An item that I definitely need clarification is amine unit emissions to atm. Response from November has a different value than the October emails. And I did not see an updated emissions table for those emissions. Please provide the hours of downtime for the RTO. Also review the permit conditions I have incorporated for the amine unit vent emissions.

The calculations in the October emails had the wrong number of hours for the MSS emissions for the RTO. The RTO startup emissions had 12 events at 2 hr/event for a total of 24 hours but this was revised to a maximum of 4 events per year at 2 hr/event for 8 hr/yr. This was explained in a letter from Trinity Consultants dated 11/27/2012 with the revised calculations.

For the downtime hours there was only 24 hours included instead of the intended 152 hours. The 152 hours accounts for the necessary time to cool down the thermal oxidizer prior to inspection, time to inspect the unit, and time to startup (warm up) the unit prior to being able to introduce waste gas for destruction.

Also, Kyndall had a few conditions for the flare that I was trying to figure out. One was a limit on venting to the atmosphere of 104 events per year – What is venting to the atm? And the next was MSS to atm – I’m assuming these are the emissions identified as “Maintenance Emissions to Atmosphere”?

We have prepared additional details on the maintenance activities as you requested. Under the Maintenance activities that vent to flare and then atmosphere they are listed by number of events per year. Several activities have 104 events per year but you would have to add up all the events to get the total number of maintenance activities that could vent to atmosphere over a year. We also have shutdown emissions represented in the application that will follow a similar procedure to maintenance activities as far as flaring down the vessel prior to opening to atmosphere. These were not included in the maintenance summary attachment.

Please feel free to call me if you have questions – or we can discuss on Thursday. Did you have a time that worked for you on Thursday?

Thanks,
Aimee

From: Keiser, Jessica [<mailto:Jkeiser@targaresources.com>]
Sent: Monday, October 28, 2013 9:23 AM
To: Wilson, Aimee
Cc: Roberts, Melanie; Robinson, Jeffrey
Subject: Re: Targa Train 5 GHG PSD Permit

Hi Aimee,

Just checking how things are going and if you have any questions for us on our comments. At one point, we were thinking we may all need to get on the phone to discuss the destruction efficiency on the RTO and maybe talk about the glycol unit. We're still available to discuss.

Thanks,
Jessica

Sent from my iPhone

On Oct 17, 2013, at 4:35 PM, "Wilson, Aimee" <Wilson.Aimee@epa.gov> wrote:

Since Kyndall is out on maternity leave, I was asked to finalize your permit and prepare everything for public notice. Jeff Robinson forwarded me several emails from both of you. I will be going through everything and making the needed revisions to the draft permit. I will be in contact with you if I have any questions and will send a revised permit to you before we go to notice for a final check.

Feel free to call me at (214) 665-7596 if you have any questions.

Thanks,
Aimee Wilson
<image003.jpg>

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