

From: Crystal DelaCruz
Sent: Friday, July 26, 2024 12:06 PM
To: Guo, Yanshan
Cc: Foster, Tanner; Pina, Stephanie; Thomas Greinert; Dan Sims; Michael Partee; Miro, Alena M.; Weiler, Jeff; Trishia McDonald
Subject: RE: draft email RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Thank you Peter. My manager, Mr. Michael Partee, has been in contact with Mr. Wieler and have determined a path forward with the pending project. We will continue to have further discussions about the NSPS OOOOb applicability outside of the permitting timeframes. This project should be set to be approve/issued on Monday.

Let me know if you have any questions.

Have a great weekend.

Thanks,
Crystal



How are we doing?

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From: Guo, Yanshan <yanshan.guo@energytransfer.com>
Sent: Thursday, July 25, 2024 4:08 PM
To: Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Thomas Greinert <Thomas.Greinert@tceq.texas.gov>; Dan Sims <dan.sims@tceq.texas.gov>; Michael Partee <michael.partee@tceq.texas.gov>; Miro, Alena M. <alena.miro@energytransfer.com>; Weiler, Jeff <Jeff.Weiler@energytransfer.com>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>
Subject: FW: draft email RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station
Importance: High

Hi Ms. McDonald,

I am trying to email you again because my original email was returned due to the attachment size limit by TCEQ.

Please see below for our response. Let me know if you can receive all attachments.

Thanks,

Peter (Yanshan) Guo, P.E.
Staff Engineer, E&C Environmental

Energy Transfer
O: 214.840.5412
M: 469.233.7014



From: Guo, Yanshan
Sent: Thursday, July 25, 2024 3:43 PM
To: 'Trishia McDonald' <Trishia.McDonald@tceq.texas.gov>
Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Thomas Greinert <Thomas.Greinert@tceq.texas.gov>; Dan Sims <dan.sims@tceq.texas.gov>; Michael Partee <michael.partee@tceq.texas.gov>; Miro, Alena M. <alena.miro@energytransfer.com>; Weiler, Jeff <Jeff.Weiler@energytransfer.com>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>
Subject: RE: draft email RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station
Importance: High

Good afternoon,

Thank you for the meeting this morning. Please find attached EPA interpretation for facility relocation under NSPS and some project examples previously approved by TCEQ as you requested, including the following documents:

EPA ADI NR128 for Part 60, OOO, Nonmetallic Mineral Processing
EPA ADI 0300006 for Part 60, GG, Stationary Gas Turbines
EPA ADI 0000110 for Part 60, GG, Stationary Gas Turbines
EPA Letter OOOO Applicability Determination for Two Compressors at Hattievillle Compressor Station
EPA Federal Register / Vol. 77, No. 159 for OOOO Preamble
TCEQ Approved Project - Tippet Gas Plant Standard Permit in 2012 – Adding Compressors (Only regulation applicability pages provided due to the original file size)
TCEQ Approved Project - Wilma CS Standard Permit in 2016 – Adding Compressors (Only regulation applicability pages provided due to the original file size)
TCEQ Approved Project - Area 41 CGP Facility Non-Rule Standard Permit in 2017 – Replacing compressors (Only regulation applicability pages provided due to the original file size)

As discussed previously, the fugitive components at the site will be subject to NSPS OOOOb due to the hp increase of the proposed compressor under § 60.5365b (i). ET will comply with the applicable requirement under the rule.

Please note that “For purposes of § 60.5397b, a “modification” to a compressor station occurs when...” applies to fugitive emissions components affected facilities, NOT to each reciprocating compressor affected facility under 60.5365b (c).

However, the proposed compressor at the site will not be subject to the NSPS OOOOb based on the citation: § 60.5365b (c) and § 60.5385b does not apply to the proposed compressor at the site. The proposed compressor at Encana Summit Compressor Station was manufactured prior to Dec

6, 2022, effective date of NSPS OOOOb. There is no modification for compressor's emission according to § 60.14 and it had not been reconstructed and modified, therefore, it is not subject to NSPS OOOOb. Based on the manufacture date of the proposed compressor, it was determined to be subject to NSPS OOOOa, not NSPS OOOOb. As provided in 40 CFR 60.14(e)(6), relocation of an existing facility is not modification. Simply relocating a compressor to replace an existing unit is not construction, modification, and reconstruction under NSPS and would not trigger new NSPS applicability according to all attached EPA documents and TCEQ approved permits.

Let me know if you have any questions.

Thanks,

Peter (Yanshan) Guo, P.E.

Staff Engineer, E&C Environmental

Energy Transfer

O: 214.840.5412

M: 469.233.7014



From: Trishia McDonald <Trishia.McDonald@tceq.texas.gov>

Sent: Wednesday, July 24, 2024 4:33 PM

To: Guo, Yanshan <yanshan.guo@energytransfer.com>

Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Thomas Greinert <Thomas.Greinert@tceq.texas.gov>; Dan Sims <dan.sims@tceq.texas.gov>; Michael Partee <michael.partee@tceq.texas.gov>; Miro, Alena M. <alena.miro@energytransfer.com>; Weiler, Jeff <Jeff.Weiler@energytransfer.com>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>

Subject: RE: draft email RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Good afternoon Peter,

We have discussed with our management and would like to schedule a meeting for tomorrow. Please let us know your availability tomorrow.

Thank you,

Ms. Trishia McDonald
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-2250
Trishia.McDonald@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at
<https://www.tceq.texas.gov/customersurvey>

From: Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>

Sent: Tuesday, July 23, 2024 12:47 PM

To: Guo, Yanshan <yanshan.guo@energytransfer.com>

Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Thomas Greinert <Thomas.Greinert@tceq.texas.gov>; Dan Sims <dan.sims@tceq.texas.gov>; Michael Partee <michael.partee@tceq.texas.gov>; Miro, Alena M. <alena.miro@energytransfer.com>; Weiler, Jeff <Jeff.Weiler@energytransfer.com>

Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Thank you Peter. We will review that provided information and provide you with an update soon.

Have a great day.

Thanks,
Crystal



How are we doing?

Fill out our online customer satisfaction survey at: <https://www.tceq.texas.gov/customersurvey>

From: Guo, Yanshan <yanshan.guo@energytransfer.com>

Sent: Tuesday, July 23, 2024 12:44 PM

To: Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>

Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Thomas Greinert <Thomas.Greinert@tceq.texas.gov>; Dan Sims <dan.sims@tceq.texas.gov>; Michael Partee <michael.partee@tceq.texas.gov>; Miro, Alena M. <alena.miro@energytransfer.com>; Weiler, Jeff <Jeff.Weiler@energytransfer.com>

Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Importance: High

Hi Ms. Crystal DelaCruz,

Thank you for the meeting we had yesterday. Please find attached EPA interpretation regarding facility relocation under NSPS rule as you requested.

Per this reference, the proposed compressor at Encana Summit Compressor station was manufactured prior to Dec 6, 2022, effective date of NSPS OOOOb and had not been reconstructed and modified, therefore, it is not subject to NSPS OOOOb. According to 40 CFR 60.14(e)(6), relocation or change of ownership shall not be considered a modification.

Let me know if this addressed our concerns.

Regards,

Peter (Yanshan) Guo, P.E.

Staff Engineer, E&C Environmental

Energy Transfer

O: 214.840.5412

M: 469.233.7014



From: Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>

Sent: Monday, July 22, 2024 2:21 PM

To: Guo, Yanshan <yanshan.guo@energytransfer.com>

Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Thomas Greinert <Thomas.Greinert@tceq.texas.gov>; Dan Sims <dan.sims@tceq.texas.gov>; Michael Partee <michael.partee@tceq.texas.gov>; Miro, Alena M. <alena.miro@energytransfer.com>

Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Importance: High

Good afternoon Peter,

It was a pleasure speaking with you and your colleagues this afternoon. Per the meeting, here are the options discussed for the project not to trigger NSPS OOOOb:

- Provide a "Determination of Construction or Modification" per 60.5 from EPA which confirms that the project as represented should not be considered construction or modification for NSPS applicability determination purposes. An existing determination from the EPA Applicability Determination Index that addresses relocation to a different site as a replacement facility can be used for this purpose.
- Alternatively, the facility can be authorized as a replacement under PBR 106.264 to be consistent with the NSPS applicability determination, provided that all PBR requirements can be met including no increase in authorized emissions or capacity as compared the facility being replaced.

Failure to submit all of the requested information by **July 26, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-1S (Registrations for Air Standard Permit) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 116. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

Respectfully,

Crystal DelaCruz

Team Leader | Rule Registrations Section
Air Permits Division
Texas Commission on Environmental Quality
(512) 239-1216

Crystal.DelaCruz@tceq.texas.gov

www.tceq.texas.gov

How are we doing? <https://www.tceq.texas.gov/customersurvey>

From: Crystal DelaCruz

Sent: Tuesday, July 16, 2024 5:28 PM

To: Guo, Yanshan <yanshan.guo@energytransfer.com>; Miro, Alena M.

<alena.miro@energytransfer.com>

Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Pina, Stephanie

<stephanie.pina@energytransfer.com>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Thomas

Greinert <Thomas.Greinert@tceq.texas.gov>; Dan Sims <Dan.Sims@tceq.texas.gov>

Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Hi Peter,

I will be out of the office on Friday but if you are available to meet, I can have my Work Leader, Ms. Trishia McDonald attend the meeting in my place. Our Technical Specialists, Mr. Dan Sims, and Ms. Dara Winsted, will also be available on Friday. I will be available on Monday.

Availability:

Friday, July 19th from 1-2pm

Attendees:

- Trishia McDonald – Work Leader
- Dan Sims – Technical Specialist
- Dara Winsted – Technical Specialist
- Thomas Greinert – Permit Reviewer

Monday, July 22nd anytime from 1-4pm

Attendees:

- Crystal DelaCruz – Team Leader
- Dan Sims – Technical Specialist
- Dara Winsted – Technical Specialist
- Thomas Greinert – Permit Reviewer

Let me know if you have any questions. Feel free to send the Microsoft Teams invite.

Respectfully,

Crystal DelaCruz

Team Leader | Rule Registrations Section
Air Permits Division
Texas Commission on Environmental Quality
(512) 239-1216

Crystal.DelaCruz@tceq.texas.gov

www.tceq.texas.gov

How are we doing? <https://www.tceq.texas.gov/customersurvey>

From: Guo, Yanshan <yanshan.guo@energytransfer.com>

Sent: Tuesday, July 16, 2024 1:40 PM

To: Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>; Miro, Alena M. <alena.miro@energytransfer.com>

Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Thomas Greinert <Thomas.Greinert@tceq.texas.gov>; Dan Sims <dan.sims@tceq.texas.gov>

Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Hi Crystal,

We would be available for a conference call for 1-4pm on Friday (July 19) or 1-4pm on Monday (Jul 22). Let me know what time would work for you or if you prefer other time.

Thanks,

Peter (Yanshan) Guo, P.E.

Staff Engineer, E&C Environmental
Energy Transfer
O: 214.840.5412
M: 469.233.7014



From: Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>

Sent: Monday, July 15, 2024 6:32 PM

To: Guo, Yanshan <yanshan.guo@energytransfer.com>; Miro, Alena M. <alena.miro@energytransfer.com>

Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Thomas Greinert <Thomas.Greinert@tceq.texas.gov>; Dan Sims <dan.sims@tceq.texas.gov>

Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Good evening Mr. Guo,

I am responding on behalf of Mr. Greinert. If you could send us your availability for this week, we would like to set up a call to discuss the NSPS OOOOb applicability of the compressor.

Have a great evening.

Respectfully,

Crystal DelaCruz

Team Leader | Rule Registrations Section
Air Permits Division
Texas Commission on Environmental Quality
(512) 239-1216
Crystal.DelaCruz@tceq.texas.gov
www.tceq.texas.gov
How are we doing? <https://www.tceq.texas.gov/customersurvey>

From: Guo, Yanshan <yanshan.guo@energytransfer.com>

Sent: Monday, July 15, 2024 12:54 PM

To: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>; Miro, Alena M. <alena.miro@energytransfer.com>

Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>

Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Importance: High

Hi Mr. Thomas Greinert,

Thanks for your response. I want to make sure we are on the same page for the compressor NSPS OOOOb regulation applicability determination for this project.

For the proposed compressor, the NSPS OOOOb regulation applicability was determined based on the following citation:

§ 60.5365b Am I subject to this subpart?

You are subject to the applicable provisions of this subpart if you are the owner or operator of one or more of the onshore affected facilities listed in paragraphs (a) through (i) of this section, that is located within the Crude Oil and Natural Gas source category, as defined in § 60.5430b, for which you commence construction, modification, or reconstruction after December 6, 2022.

(c) Each reciprocating compressor affected facility, which is a single reciprocating compressor. A reciprocating compressor located at a well site is not an affected facility under this subpart. A reciprocating compressor located at a centralized production facility is an affected facility under this subpart.

Based on the manufacture date of the proposed compressor, it was determined to be subject to NSPS OOOOa, not NSPS OOOOb. Simply relocating a compressor to replace an existing unit is not construction, modification, and reconstruction under NSPS and would not trigger new NSPS applicability. You mentioned “Operational changes are considered to be modifications”. We would like to request more guidance about the definition of the modification from TCEQ.

For the fugitive components at the site, the NSPS OOOOb regulation applicability was determined based on the following citation:

§ 60.5365b Am I subject to this subpart?

You are subject to the applicable provisions of this subpart if you are the owner or operator of one or more of the onshore affected facilities listed in paragraphs (a) through (i) of this section, that is located within the Crude Oil and Natural Gas source category, as defined in § 60.5430b, for which you commence construction, modification, or reconstruction after December 6, 2022.

- (i) Each fugitive emissions components affected facility, which is the collection of fugitive emissions components at a well site, centralized production facility, or a compressor station.*

(3) For purposes of § 60.5397b, a “modification” to a compressor station occurs when:

- (i) An additional compressor is installed at a compressor station; or*
- (ii) One or more compressors at a compressor station is replaced by one or more compressors of greater total horsepower than the compressor(s) being replaced. When one or more compressors is replaced by one or more compressors of an equal or smaller total horsepower than the compressor(s) being replaced, installation of the replacement compressor(s) does not trigger a modification of the compressor station for purposes of § 60.5397b.*

As discussed previously, the fugitive components at the site will be subject to NSPS OOOOb due to the hp increase of the proposed compressor. ET will comply with the applicable requirement under the rule.

Let me know if this addressed your concerns. I will propose some time slots for a follow up call.
Thanks again,

Peter (Yanshan) Guo, P.E.
Staff Engineer, E&C Environmental
Energy Transfer
O: 214.840.5412
M: 469.233.7014



From: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>
Sent: Monday, July 15, 2024 11:30 AM
To: Miro, Alena M. <alena.miro@energytransfer.com>
Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Guo, Yanshan <yanshan.guo@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Crystal Delacruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Good morning,

I've discussed this project with management and our technical specialists. Operational changes are considered to be modifications; therefore, the increased gas throughput would be considered a modification of the site. Additionally, per §60.5365b(i)(3):

“For purposes of §60.5397b, a “modification” to a compressor station occurs when: (i) An additional compressor is installed at a compressor station; or (ii) **One or more compressors at a compressor station is replaced by one or more compressors of greater total horsepower than the compressor(s) being replaced.** When one or more compressors is replaced by one or more compressors of an equal or smaller total horsepower than the compressor(s) being replaced, installation of the replacement compressor(s) does not trigger a modification of the compressor station for purposes of §60.5397b.”

As this project involves replacing one compressor at a compressor station with one of greater horsepower, it would also be considered a modification.

Per §60.5, you may request that the EPA review the project to determine if it constitutes construction or modification. If the company will be pursuing an EPA determination, this project will need to be withdrawn to comply with agency timelines.

If you would like to schedule a call with management and our technical specialist, please provide some times that work for you and I will schedule the call. Otherwise, please explain how the company will comply with NSPS OOOOb or let me know if the company will be pursuing an EPA determination.

Failure to submit all of the requested information by **July 19, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-1S (Registrations for Air Standard Permit) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 116. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

Thomas Greinert
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-2254
thomas.greinert@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Miro, Alena M. <alena.miro@energytransfer.com>
Sent: Friday, July 12, 2024 4:26 PM
To: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>
Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Guo, Yanshan <yanshan.guo@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Hi Thomas,

The compressor is the affected unit per the OOOO regulations (OOOO/OOOOa/OOOOb/OOOOc)

(c) Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

Processing more gas will not increase the air emissions from the affected unit. The only emissions generated from a compressor would be fugitive in nature.

Let me know if maybe we should schedule a call to talk through this?

Alena Miro
Manager, Environmental Compliance
Western Division
Energy Transfer
M: 713.865.6825



From: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>
Sent: Friday, July 12, 2024 2:47 PM
To: Miro, Alena M. <alena.miro@energytransfer.com>
Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Guo, Yanshan <yanshan.guo@energytransfer.com>; Pina, Stephanie <stephanie.pina@energytransfer.com>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Good afternoon,

Thank you for the response. As the replacement engine will have a higher horsepower than the existing engine, please clarify how this will not result in increased gas going through the compressor.

Failure to submit all of the requested information by **July 17, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-1S (Registrations for Air Standard Permit) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 116. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

Thank you,
Thomas Greinert
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-2254
thomas.greinert@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at
www.tceq.texas.gov/customersurvey

From: Miro, Alena M. <alena.miro@energytransfer.com>
Sent: Thursday, July 11, 2024 3:58 PM
To: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>; Guo, Yanshan <yanshan.guo@energytransfer.com>
Cc: Foster, Tanner <tanner.foster@energytransfer.com>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Pina, Stephanie <stephanie.pina@energytransfer.com>
Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Hi Thomas –

I agree that the facility fugitive emission are subject to OOOOb regulations as the site is increasing total HP. However, the compressor has not increased emissions. The increase in emissions is generated from the engine which is not an applicable facility in OOOOb.

Alena Miro
Manager, Environmental Compliance
Western Division
Energy Transfer
M: 713.865.6825



From: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>

Sent: Thursday, July 11, 2024 2:46 PM

To: Guo, Yanshan <yanshan.guo@energytransfer.com>

Cc: Miro, Alena M. <alena.miro@energytransfer.com>; Crystal DelaCruz

<Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>

Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station

Good afternoon,

NSPS OOOOb (§ 60.5365b) states that a facility is subject if construction, modification, or reconstruction is commenced post December 6, 2022.

As NSPS OOOOb is located in 40 CFR Part 60, the definition of construction that must be used is in § 60.2, which does not exclude relocation.

The compressor is being installed at a new location and causing an increase in emissions. This is considered a construction activity.

As for considering the installation of the engine as a modification, § 60.14(e) and (e)(6) states that relocation, by itself, is not considered a modification. The project includes replacement of a 1,775 hp compressor engine with a 1,875 hp compressor engine, resulting in increased emissions of VOC and other pollutants. Since emissions at the site are increasing with this project, the relocation is not an isolated action and triggers a modification.

Additionally, fugitive components at the site will also be considered modified and subject to NSPS OOOOb per § 60.5365b(i)(3).

“For purposes of § 60.5397b, a “modification” to a compressor station occurs when: (i) An additional compressor is installed at a compressor station; or (ii) One or more compressors at a compressor station is replaced by one or more compressors of greater total horsepower than the compressor(s) being replaced. When one or more compressors is replaced by one or more compressors of an equal or smaller total horsepower than the compressor(s) being replaced, installation of the replacement compressor(s) does not trigger a modification of the compressor station for purposes of § 60.5397b.”

Please clarify how this project does not result in the construction or modification of an affected facility.

Failure to submit all of the requested information by **July 18, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-1S (Registrations for Air Standard Permit) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 116. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

Thank you,

Thomas Greinert
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-2254
thomas.greinert@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at
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From: Guo, Yanshan <yanshan.guo@energytransfer.com>
Sent: Tuesday, July 9, 2024 3:57 PM
To: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>
Cc: Miro, Alena M. <alena.miro@energytransfer.com>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station site
Importance: High

Hi Mr. Thomas Greinert,

The proposed engine was made in 2019 and then installed and operated at other sites before the OOOOb applicable date. It will be relocated to Encana Summit CDP Station for this engine replacement project. Simply relocating an engine to replace an existing unit would not trigger new NSPS applicability. Therefore, the proposed engine/compressor will not be subject to the NSPS OOOOb. Please refer to the following definitions under NSPS and MACT. Let me know if this addressed your concerns.

§ 60.14 Modification.

- (e) The following shall not, by themselves, be considered modifications under this part:
- (6) The relocation or change in ownership of an existing facility.

§ 63.2 Definitions. *Construction* means the on-site fabrication, erection, or installation of an affected source. Construction does not include the removal of all equipment comprising an affected source from an existing location and reinstallation of such equipment at a new location. The owner or operator of an existing affected source that is relocated may elect not to reinstall minor ancillary equipment including, but not limited to, piping, ductwork, and valves. However, removal and reinstallation of an affected source will be construed as reconstruction if it satisfies the criteria for reconstruction as defined in this section. The costs of replacing minor ancillary equipment must be considered in determining whether the existing affected source is reconstructed.

§ 60.2 Definitions. *Construction* means fabrication, erection, or installation of an affected facility.

Thanks,

Peter (Yanshan) Guo, P.E.

Staff Engineer, E&C Environmental

Energy Transfer

O: 214.840.5412

M: 469.233.7014



From: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>

Sent: Tuesday, July 9, 2024 1:58 PM

To: Guo, Yanshan <yanshan.guo@energytransfer.com>

Cc: Miro, Alena M. <alena.miro@energytransfer.com>; Crystal DelaCruz

<Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>

Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station site

Good afternoon,

Thank you for your response. OOOOb applicability is determined by the equipment's date of installation or modification, not manufacture date. As this project is being executed after the OOOOb start date, the engine would fall under OOOOb unless there is another reason that it would not be applicable. Please let me know if OOOOb is applicable to this project and how the company will comply if so.

Failure to submit all of the requested information by **July 16, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-1S (Registrations for Air Standard Permit) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 116. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

If you have questions or would like to discuss this project over the phone, feel free to contact me.

Thomas Greinert
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-2254
thomas.greinert@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at
www.tceq.texas.gov/customersurvey

From: Guo, Yanshan <yanshan.guo@energytransfer.com>

Sent: Monday, July 8, 2024 3:39 PM

To: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>

Cc: Miro, Alena M. <alena.miro@energytransfer.com>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Subject: RE: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station site

Hi Mr. Thomas Greinert,

Based on the engine/compressor manufacture date (2019) , the proposed compressor will not be subject to the NSPS OOOOb. Let me know if this addressed your concerns or need anything else.

Thanks,

Peter (Yanshan) Guo, P.E.

Staff Engineer, E&C Environmental
Energy Transfer
O: 214.840.5412
M: 469.233.7014



From: Thomas Greinert <Thomas.Greinert@tceq.texas.gov>
Sent: Wednesday, July 3, 2024 9:09 AM
To: Guo, Yanshan <yanshan.guo@energytransfer.com>
Cc: Miro, Alena M. <alena.miro@energytransfer.com>; Crystal DelaCruz <Crystal.DelaCruz@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Subject: TCEQ Air Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC's Encana Summit Cdp Station site

Good morning,

I am the TCEQ Air Permit Reviewer assigned to the Standard Permit No. 149029 / Project No. 375846 at ET Gathering & Processing LLC and Encana Summit Cdp Station in Midland County, Texas. You have been identified as a Technical Contact.

I have completed my initial review for this project and will need additional information/clarification before I can proceed with my review. Please address the following:

- The application addresses OOOOa applicability; however, the EPA has finalized new source performance standards (NSPS) OOOOb with an effective date of May 7th, 2024.
 - As the new engine will fall under OOOOb, please address OOOOb applicability for the project.

Failure to submit all of the requested information by **July 12, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-1S (Registrations for Air Standard Permit) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC

Chapter 116. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

If you have questions or would like to discuss this project over the phone, feel free to contact me.

Mr. Thomas Greinert
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-2254
Thomas.Greiner@tceq.texas.gov

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www.tceq.texas.gov/customersurvey

Private and confidential as detailed [here](#). If you cannot access hyperlink, please e-mail sender.