

From: Allen, Chris <christopher.allen@targaresources.com>
Sent: Wednesday, August 28, 2024 9:24 AM
To: Clare Hubbell
Cc: Trishia McDonald
Subject: RE: [EXTERNAL] RE: TCEQ Air Permit No. 177260 / Project No. 378571 at Gulf Coast Fractionator's Site
Attachments: MOC Project List - PBR 177260.docx

Clare-

Please find the response below and the attached project list to address the items requested in item two in the email below. Please let me know if you have any questions on the information provided.

Regards,
Chris Allen

From: Clare Hubbell <Clare.Hubbell@tceq.texas.gov>
Sent: Tuesday, August 27, 2024 1:29 PM
To: Allen, Chris <christopher.allen@targaresources.com>
Cc: Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Subject: [EXTERNAL] RE: TCEQ Air Permit No. 177260 / Project No. 378571 at Gulf Coast Fractionator's Site

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Good afternoon,

Thank you for providing a response to my questions. Before I can proceed with my review, please also address the following:

- Are emissions from the replacement cooling tower the same as emissions from the old cooling tower? If emissions are increasing, the replacement can remain authorized under PBRs 106.261/262.

The emissions from the cooling tower will be identical to the previous cooling tower so there isn't a need to authorize any cooling tower emissions under 106.261/262.

- The fugitive projects can be included in this registration. Please provide a description of each project and a brief explanation on why each project was done.

I have attached a MOC/Project List with the description of the change and the reason for the change. All of these small projects will not have any upstream or downstream effects on the facility.

Failure to submit all of the requested information by **August 30, 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-7/PI-7 CERT (General Application for

Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. 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,

Ms. Clare Hubbell
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-1254
Clare.Hubbell@tceq.texas.gov

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From: Allen, Chris <christopher.allen@targaresources.com>
Sent: Tuesday, August 20, 2024 10:38 AM
To: Clare Hubbell <Clare.Hubbell@tceq.texas.gov>
Cc: Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Subject: RE: [EXTERNAL] TCEQ Air Permit No. 177260 / Project No. 378571 at Gulf Coast Fractionator's Site

Clare-

Please find the responses below for the questions received on August 19, 2024. Please let me know if you have any questions on the responses or need anything else.

Regards,
Chris Allen

From: Clare Hubbell <Clare.Hubbell@tceq.texas.gov>
Sent: Monday, August 19, 2024 2:59 PM
To: Allen, Chris <christopher.allen@targaresources.com>
Cc: Grantham, Bill A. <BGrantham@targaresources.com>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>
Subject: [EXTERNAL] TCEQ Air Permit No. 177260 / Project No. 378571 at Gulf Coast Fractionator's Site

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Good afternoon,

I am the TCEQ Air Permit Reviewer assigned to the PBR Permit No. 177260 / Project No. 378571 at Gulf Coast Fractionators in Chambers 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:

- Based on the description provided, the replacement of the cooling tower would be more appropriately authorized under [PBR 106.264: Replacements of Facilities](#). Please provide clarification on why PBR 106.264 is not being used to authorize the cooling tower replacement.

After looking more at the project, the replacement of the cooling tower should have been registered under 106.264. The cooling tower functions in the same/similar manner (identical) to the unit being replaced. The emissions from the replacement cooling tower do not exceed 25 tpy. The physical location of the replacement cooling tower is located immediately adjacent to the unit being replaced. Additionally, there will be no increase in the capacity, production rate, or throughput of the replaced unit.

- Are the additional fugitive components associated with the cooling tower replacement? If they are not, please clarify why additional fugitive components are needed.

These are part of several small projects that are being conducted at the same time. We can pull these out of this PBR and include them in the annual fugitive PBR, but we wanted to include them as they were taking place at the same time with these other smaller projects. We can provide descriptions for these project if requested.

- Are there any upstream or downstream effects at the site resulting from this project?

There are no upstream or downstream effects resulting from the fugitive projects, replacing the cooling tower, installing the fire water pump engines, or adding the parts washer.

- The speciated emissions show emissions consisting of methyl mercaptan and ethyl mercaptan. These chemicals are listed under [PBR 106.262\(a\)\(4\)](#), so additional requirements apply to facilities handling these chemicals. Please provide the distance to nearest property line for facilities handling these chemicals.

For these facilities, they are located 400 feet from the property line, and roughly 1,100 feet from the nearest offsite receptor.

Failure to submit all of the requested information by **August 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-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. 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.

Ms. Clare Hubbell
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-1254

Clare.Hubbell@tceq.texas.gov

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MOC 987057-4

Description: Installing a pressure letdown using control valves and bypass will be installed on the HPL (second fuel gas provider) feed. Two control valves will be installed in series (with dedicated pressure drops on each) will provide redundancy if one of them fail and the other can regulate the pipeline pressure.

Reason for Change: The second fuel gas provider didn't want the liability of a pressure letdown on the supplemental fuel gas line, so GCF will install the pressure letdown to ensure pipeline integrity.

MOC 987057-5

Description: The project scope is to install a flow transducer into the flare header with a flange-to-flange connection to remove the meter spool piece to assist in future flow transducer calibrations.

Reason for Change: The flow transducers are required to be removed from the flare header and calibrated on a removable pipe spool piece. The meter spool piece will be installed on the header with a flange-to-flange connection.

MOC 987057-6

Description: Add tubing from the GCF plant air to install the Solar skid for valves with solenoid activation.

Reason for Change: Revamping the Solar process (inside skid limits), the new equipment will require plant air. The plant air will activate valve solenoids and inside the Solar skid will contain double block and bleed.

MOC 987057-11

Description: The project scope will remove the main fuel gas spool piece and modify it to fit the 2" Coriolis meter and add pipe reducers to reduce the 4" process pipe to 2" meters. Demo the starter gas fuel line to fit the meter.

Reason for Change: The reason for change is to fit and use a Solar recommended Coriolis meter.

MOC 987057-12

Description: Replacing the gasoline control valve on the gasoline merichem system.

Reason for Change: The gasoline control valve will be replaced due to previous operations having the control valve by 100% open with an open bypass to relieve any flow restrictions.