

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) RENEWAL

Permit #:	03037	Company:	Midcoast G & P (East Texas) L.P.
Project #:	35879	Site:	Avinger Gas Processing Plant
Regulated Entity #:	RN102735800	Application Area:	Avinger Gas Processing Plant
Region:	5	Customer #:	CN603573817
NAICS Code:	211111	County:	Marion
Permit Reviewer:	Liam Lin	NAICS Name:	Crude Petroleum and Natural Gas Extraction

SITE INFORMATION

Physical Location: 2339 Avinger Cut Off
Nearest City: Avinger
Major Pollutants: CO, NOX, VOC
Additional FOPs: None

PROJECT SUMMARY

Midcoast G & P (East Texas) L.P.'s Avinger Gas Processing Plant is a crude petroleum and natural gas extraction facility subject to the requirement of 30 TAC Chapter 122. The Federal Operating Permit (FOP) was issued on January 12, 2009 (Permit #03037), and most recently renewed on June 5, 2019. A timely renewal application was received by TCEQ on October 31, 2023. Significant emission sources at the site include fugitive equipment, compressor engines, loading facilities, and flares, which are subject to State and/or Federal regulations. This permit also includes existing case-by-case CAM for unit IDs C-5C and C-6B for CO and existing case-by-case PM for unit ID TRB-1 for NOx. The FOP includes general and special terms and conditions and unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-REQ1, OP-1, OP-2, OP-CRO1, OP-ACPS, OP-SUMR, OP-PBRSUP and various unit attribute forms).

PROCESS DESCRIPTION

The facility receives oil and sour gas streams separated at the individual well heads via a gathering pipeline system. From the inlet receivers, gas and oil are routed to one of three (3) 3-phase separators. Produced water that may precipitate during this step is routed to one of the slop oil/produced water storage tanks. Accumulated produced water is skimmed of any oil and is removed via a pipeline for offsite disposal. A truck loading connection is available for removal of produced water should a pipeline experience a prolonged downtime.

The crude oil stream from the separator is routed to the dedicated oil storage tanks from where it is sold via a LACT unit into a pipeline or transported offsite by tank trucks. Emissions collected during truck loading operations are routed to a dedicated control flare. Vapor recovery units (VRUs) with a sweet gas blanket are utilized to collect and route the flashing, working, and breathing emissions from the storage tanks into the sales pipeline. During periods of downtime, tank emissions are routed to the main facility flare.

The natural gas stream from the separators is routed to a compressor suction header for recompression into a sales pipeline owned and operated by a third party. The compression is powered by natural gas-fired spark ignition internal combustion reciprocating engines. The blowdowns from the compressors are routed to the main facility flare. In an event of a compressor failure, the gas that cannot be re-compressed into the sales pipeline is routed to the main facility flare. During pipeline pigging operations, all gas from the pig receivers and launchers is captured and routed to a dedicated vertical flare.

TECHNICAL REVIEW

Permit Content Summary

1. Was Periodic Monitoring (PM) required and included in the permit?.....	Yes
2. Was Compliance Assurance Monitoring (CAM) required and included in the permit?.....	Yes
3. Was case-by-case PM or CAM included in the permit?.....	Yes

4. Was a permit shield requested?..... Yes
5. If a permit shield was requested, was any permit shield request denied?..... No
6. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements..... No
 - (b) Customized Special Terms and Conditions..... Yes
 - (c) Manual changes to the IMS-generated applicable requirements..... Yes
 - (d) Alternate means of compliance for any emission unit/source at the site..... No
7. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?..... No
8. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... Yes
9. Will the draft permit be sent to public notice with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

- Special Term and Condition 1.E (IMS term A.001.G) was updated to include language regarding MACT ZZZZ and the Chapter 113 citation associated with this subpart.
- Special Term and Condition 9 (IMS term B.142) was updated to include the project number and date of Form OP-PBRSUP submittal.
- Existing case-by-case CAM for unit IDs C-5C and C-6B for CO and NOx against 30 TAC Chapter 106, Permits by Rule, was built on the permit side of the IMS and has been reviewed and retained. The existing case-by-case CAM for NOx against 30 TAC chapter 117, East Texas Combustion, was also reviewed and retained for the same unit.
- Existing case-by-case PM for unit ID TRB-1 for NOx against 40 CFR Part 60, Subpart GG, has been reviewed and retained.
- Existing permit shields for group ID GRP-LOAD and unit ID LPSEP were reviewed and retained.
- After review of the Working Draft Permit, the applicant requested some manual citation changes. These citation changes were subsequently approved by Technical Specialist Carolyn Maus on August 14, 2024. For NSPS KKK, citations 60.636(b)-(c) were removed from certain components because they only applied to pressure relief devices. 60.636(b) specifies pressure relief device information to include in the initial semiannual report. 60.636(c) specifies pressure relief device information to include in all semiannual reports (that would be the initial report as opposed to subsequent reports). RRT will need to be corrected in the future to fix this.
 - o Unit ID BTFUG, SOP Index No. 60KKK-002: Deleted 60.636(b) and [G]60.636(c) from Reporting Requirements in rows for connectors, valves in light liquid service, and valves in gas/vapor service.
 - o Unit ID FUG-3, SOP Index No. 60KKK-001: Deleted 60.636(b) and [G]60.636(c) from Reporting Requirements in rows for connectors and valves in gas/vapor service.

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP. A Statement of Basis was prepared for this project and is included in the permit file.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on November 7, 2024.
 Site rating: 15.47 / Satisfactory Company rating: 2.42 / Satisfactory
 (High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)
2. Has the permit changed on the basis of the compliance history or site/company rating?..... No

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?..... No
2. Is a compliance plan and schedule included in the permit?..... No

Delinquent Fee Check

1. The delinquent fee check was performed on November 7, 2024.
2. Were there any delinquent fees owed? No

Public Notice Information

1. Were comments received from the applicant after the draft permit was mailed and before Public Notice was published?..... No
2. Was a revised draft permit or public notice authorization package (PN-Errata) sent

- for any reason?..... No
3. Publication date: January 3, 2025 Newspaper name: Jefferson Jimplecute
4. Was bilingual public notice published?..... No
Publication date: Newspaper name:
5. Were comments received during Public Notice period?..... No
(a) Was a public hearing requested?..... No
(b) Was a public hearing held?..... No
(c) Was the public hearing request withdrawn?..... No
(d) Was permit content changed as a result of any public comments?..... No
6. Was re-publication necessary?..... Yes

Permit reviewer notes:

- The applicant informed the permit reviewer after the public notice was published on December 27, 2024, that the public viewing place that was chosen is not in the same county as the site. However, per 30 TAC 122.320 (b) it states it must be in the same county as the site. A new public viewing place was identified and forms, including OP-1 and PNAP, were updated to reflect the correct viewing place (Marion County Courthouse, 102 West Austin Street, Suite 206, Jefferson, Texas 75657-2266). Old PNAP Content ID: 7430267. New PNAP Content ID: 7517822
- The Office of the Chief Clerk (OCC) was checked on February 26, 2025, to verify no public comments.

EPA Review

1. Did EPA comment on the draft permit?..... No
2. Was a separate NOPP - Notice of Proposed Permit sent to the EPA?..... No
If yes, did the EPA comment on the proposed permit?..... No
3. Were any changes made to the permit after the EPA Review Period?..... No
If yes, were these changes made within the 60 day Public Petition Period?..... No

Permit reviewer notes:

- The Office of the Chief Clerk (OCC) was checked on February 26, 2025, to verify no EPA comments.

IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	10/31/2023	
Date Project Received by Engineer	11/17/2023	
Technical Review Period	01/26/2024	10/10/2024
Working Draft Permit Reviewed by Applicant	06/20/2024	07/15/2024
2 nd Working Draft Permit Reviewed by Applicant	08/22/2024	08/27/2024
3 rd Working Draft Permit Reviewed by Applicant	10/09/2024	10/10/2024
Date PNAP/Draft Permit Mailed	12/30/2024	
Public Notice Comment Period	01/03/2025	02/03/2025
EPA Review Period	01/07/2025	02/21/2025
Date Sign Posting Certification Received	01/03/2025	

EFFECTIVE PERMIT ISSUANCE DATE: March 5, 2025



02/26/2025

02/26/2025

Liam Lin
Permit Reviewer
Operating Permits Section
Air Permits Division

Date


Elizabeth Moorhead
Team Leader
Operating Permits Section
Air Permit Division

Date

CONTACT INFORMATION

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