

From: Santiago Garcia <sgarcia@allenergy.net>
Sent: Wednesday, March 19, 2025 12:17 PM
To: Joshua Wheatley; Chang, Sheila (Houston)
Cc: Chelsea Davis; Celine Rosales; Trishia McDonald; Michael Partee
Subject: RE: TCEQ Air Permit No. 179228 / Project No. 389168 at All Bunkering LLC's All Bunkering site

Confirming the withdrawal of both permits, projects 389168 & 389169.

Cheers



Santiago Garcia

CEO

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Address: 5847 San Felipe St.,
Suite 2020 Houston, TX, 77057

From: Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>
Sent: Wednesday, March 19, 2025 12:10 PM
To: Chang, Sheila (Houston) <SHEILA.CHANG@WORLEY.COM>; Santiago Garcia <sgarcia@allenergy.net>
Cc: Chelsea Davis <Chelsea.Davis@tceq.texas.gov>; Celine Rosales <Celine.Rosales@tceq.texas.gov>;
Trishia McDonald <Trishia.McDonald@tceq.texas.gov>; Michael Partee
<michael.partee@tceq.texas.gov>
Subject: FW: TCEQ Air Permit No. 179228 / Project No. 389168 at All Bunkering LLC's All Bunkering site

Hello Sheila,

Thank you for your quick reply. To withdraw the projects we will need a confirmation from someone with the company. Please have a company representative reply to this email confirming the withdrawal of both projects 389168 & 389169.

Respectfully,

Joshua Wheatley

Team Leader | Rule and Registrations Section
Air Permits Division | Office of Air
Texas Commission on Environmental Quality
Joshua.Wheatley@tceq.texas.gov

512 239-4343

www.tceq.texas.gov

How are we doing? www.tceq.texas.gov/customersurvey

From: Chang, Sheila (Houston) <SHEILA.CHANG@WORLEY.COM>

Sent: Wednesday, March 19, 2025 11:45 AM

To: Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>; SGARCIA@ALLENERGY.NET

Cc: Michael Partee <michael.partee@tceq.texas.gov>; Kristyn Campbell <Kristyn.Campbell@Tceq.Texas.Gov>; Dianne Anderson <dianne.anderson@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>

Subject: RE: TCEQ Air Permit No. 179228 / Project No. 389168 at All Bunkering LLC's All Bunkering site

Hello Joshua,

Thank you for the information. All Bunkering has decided to withdraw the standard permit and PBR applications. We will submit a case-by-case application. For the application fee, we would like to keep it in the account and use it as part of the case-by-case application review fee. Please let me know if there are any questions.

Kristyn, I will contact you to arrange a project introduction meeting.

Thanks,

Sheila Chang, Ph.D., P.E.

Senior Environmental Engineer

5985 Rodgerdale Road, Houston, TX 77072 | USA

Mob: +1 832-830-5588 | GMT -6

worley.com



From: Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>

Sent: Tuesday, March 18, 2025 11:44 AM

To: Chang, Sheila (Houston) <SHEILA.CHANG@WORLEY.COM>; SGARCIA@ALLENERGY.NET

Cc: Michael Partee <michael.partee@tceq.texas.gov>; Kristyn Campbell <Kristyn.Campbell@Tceq.Texas.Gov>; Dianne Anderson <dianne.anderson@tceq.texas.gov>; Trishia McDonald <Trishia.McDonald@tceq.texas.gov>

Subject: FW: TCEQ Air Permit No. 179228 / Project No. 389168 at All Bunkering LLC's All Bunkering site[External Sender]

Good morning,

Thank you for taking the time to discuss the pending projects with us. If the company would like to request a site determination, please reach out to Dianne Anderson to start the process. Alternatively, if the company determines the RAP MLO or case by case route would be more appropriate or has questions on those permitting routes, please contact Kristyn Campbell

the Energy Section Manager. I have cc'd both of them on this email. Please reach out if you have any questions.

Respectfully,

Joshua Wheatley

Team Leader | Rule and Registrations Section
Air Permits Division | Office of Air
Texas Commission on Environmental Quality

Joshua.Wheatley@tceq.texas.gov

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From: Chang, Sheila (Houston) <SHEILA.CHANG@WORLEY.COM>

Sent: Tuesday, March 11, 2025 10:43 AM

To: Chelsea Davis <Chelsea.Davis@tceq.texas.gov>

Cc: SGARCIA@ALLENERGY.NET; Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>; Celine Rosales <Celine.Rosales@tceq.texas.gov>; Michael Partee <michael.partee@tceq.texas.gov>

Subject: RE: TCEQ Air Permit No. 179228 / Project No. 389168 at All Bunkering LLC's All Bunkering site

Hello Chelsea,

Thank you for the information. All Bunkering is still working to find a path forward and would like to schedule a meeting with TCEQ to discuss the applications. Therefore, we'll need to extend the processing time for this request. Please let us know if you have any questions.

Best Regards,

Sheila Chang

Senior Environmental Engineer

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From: Chelsea Davis <Chelsea.Davis@tceq.texas.gov>

Sent: Tuesday, March 4, 2025 3:39 PM

To: Chang, Sheila (Houston) <SHEILA.CHANG@WORLEY.COM>

Cc: SGARCIA@ALLENERGY.NET; Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>; Celine Rosales <Celine.Rosales@tceq.texas.gov>; Michael Partee <michael.partee@tceq.texas.gov>

Subject: RE: TCEQ Air Permit No. 179228 / Project No. 389168 at All Bunkering LLC's All Bunkering site[External Sender]

Good afternoon,

Thank you for speaking with me today. Find follow up below.

We understand that the site has two dependent operations which are proposed for authorization at the site:

PBR for production of LNG fuel (Permit 179228 / Project 389168)

Electric Generating Unit SP for ten (10) engines (Permit 179229 / Project 389169)

First, there is an issue with authorizing the production and barge loading operation under Permit by Rule.

This is due to [106.261](#) (b)(1) states *"construction of a facility authorized in another section of this chapter or for which a standard permit is in effect"*. As a relevant standard permit is in effect (MLO standard permit) a PBR cannot be used for this operation.

Second, the next option would be to authorize operations under standard permit.

[Marine Loading Operations](#) (MLO) Standard permit would be applicable as operations fit the definition in (a) *"This standard permit may be used to authorize stationary facilities, or groups of facilities, at a site that conducts marine loading operation (MLO) activities."* Issues arise with this authorization due to:

- The site is listed with SIC code 4925, which includes it being applicable to using this the MLO Standard Permit.
 - (a)(5) *"This standard permit does not authorize an MLO that belongs to the Standard Industrial Classification (SIC) Codes 1311 (Crude Petroleum and Natural Gas), 1321 (Natural Gas Liquids), 4612 (Crude Petroleum Pipelines), 4613 (Refined Petroleum Pipelines), 4922 (Natural Gas Transmission), and 4923 (Natural Gas Transmission and Distribution)"*
- The Standard Permit does not include the following operations:
 - gas treatment steps (glycol, amine, and cooling units)
 - engines used for power-generation in normal operations
- Site operations are dependent on the 10 engines to provide power to the site; and cannot meet the requirement of operational independence.
 - (a)(1) *"Sources authorized in a registration under this standard permit must operate independently of other equipment at the site..."*

Third, if another standard permit was to be looked at for the site, all the facilities (both engines and LNG) would need to be viewed in the project.

[TAC 116.610](#), a project is defined as 116.610(a) *"project means the construction or modification of a facility or a group of facilities submitted under the same registration."* As provided in the applications, the two facilities are operationally dependent and would need to be permitted as a single project.

If the site cannot be authorized under the MLO or another standard permit, the next option would be to apply for a case-by-case NSR permit.

To summarize issues:

- PBR 106.261 restricts use if there is an active standard permit available.

- MLO SP is applicable due to the barge loading operation, and the SIC code is applicable. The site cannot meet requirements.
- There cannot be two *dependent* authorizations.

Due to the specifics of the operation, it is recommended at this time to initiate a meeting with management to discuss authorization methods for the site.

Failure to submit all of the requested information by **March 11, 2025** 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.

Chelsea Davis
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-1361
Chelsea.Davis@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at
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From: Chang, Sheila (Houston) <SHEILA.CHANG@WORLEY.COM>
Sent: Monday, February 24, 2025 1:09 PM
To: Chelsea Davis <Chelsea.Davis@tceq.texas.gov>
Cc: SGARCIA@ALLENERGY.NET; Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>
Subject: RE: TCEQ Air Permit No. 179228 / Project No. 389168 at All Bunkering LLC's All Bunkering site

Hello Chelsea,

Thank you for contacting me regarding All Bunkering's PBR permit application. The marine loading is a part a LNG and bunker fuel manufacturing facility. Operation of the marine loading and the control is not independent of other equipment at the site. All Bunkering has chosen to permit the marine loading and control via PBR.

Thanks,
Sheila

From: Chelsea Davis <Chelsea.Davis@tceq.texas.gov>
Sent: Monday, February 24, 2025 11:16 AM

To: Chang, Sheila (Houston) <SHEILA.CHANG@WORLEY.COM>

Cc: SGARCIA@ALLENERGY.NET; Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>

Subject: TCEQ Air Permit No. 179228 / Project No. 389168 at All Bunkering LLC's All Bunkering site[External Sender]

Good morning,

I am the TCEQ Air Permit Reviewer assigned to the PBR Permit No. 179228 / Project No. 389168 at All Bunkering LLC and All Bunkering in Jefferson 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:

- In the application, barge loading operations and control are represented and the site showing SIC Code 4925. With this information the site appears to require use of Marine Loading Operations Standard Permit: [Non-Rule Air Quality Standard Permit for Marine Loading Operations - www.tceq.texas.gov](http://www.tceq.texas.gov). Provide clarification as to why this choice was not used.

Failure to submit all of the requested information by **March 3, 2025** 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. Chelsea Davis
Rule Registration Team
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