

Gulf Coast Growth Ventures LLC
P.O. Box 367
Gregory, TX 78359-0367



**ELECTRONIC SUBMISSION
TCEQ STEERS DATABASE**

March 21, 2025

MC 161, Permits Administrative Review Section
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Re: PBRs §106.262 - CONFIDENTIAL BUSINESS INFORMATION
MEG Unit Fugitive Increases MOCs 2286749 and 2291316
Gulf Coast Growth Ventures LLC
Customer Reference Number – CN605632439
Regulated Entity Number – RN109753731
Permit Numbers – NSR 146425, PSDTX1518, GHGPSDTX170, Title V O4169

On behalf of Gulf Coast Growth Ventures LLC, enclosed is the submission to authorize the increase in fugitive emissions by adding new equipment pursuant to Permits by Rule 30 TAC §106.262. The emission calculations are considered “CONFIDENTIAL BUSINESS INFORMATION”, and GCGV is submitting this portion of the authorization under a separate cover.

This PBR submittal satisfies the notification requirements as set forth in 30 TAC §106.262(a)(3), as follows:

Attachment 4 – Emission Calculations – **CONFIDENTIAL BUSINESS INFORMATION**

If you have any questions about this notification, please contact Jim Stoos at (409) 658-2134 or via email at jim.a.stoos1@exxonmobil.com.

Sincerely,

[Signed electronically via STEERS]

Brady Fontenot
Environmental Section Supervisor
Gulf Coast Growth Ventures LLC
Attachments

PBRs §106.262
MEG Unit Fugitive Increases MOCs 2286749 and 2291316
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Attachment 4 – Emission Calculations
CONFIDENTIAL BUSINESS INFORMATION

The emission calculations are considered “CONFIDENTIAL BUSINESS INFORMATION”, and GCGV is submitting this portion of the authorization under a separate cover. The information indicated as “CONFIDENTIAL BUSINESS INFORMATION” should be treated as such pursuant to Texas Clean Air Act §382.041(a) and the Texas Public Information Act Chapter 552. Any request for portions of this authorization that are marked as “CONFIDENTIAL BUSINESS INFORMATION” must be submitted in writing, pursuant to the Public Information Act, to the TCEQ Public Information Coordinator, MC-197, P. O. Box 13087, Austin, Texas 78711-3087.

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Gulf Coast Growth Ventures
MEG (Non-EO)
Omega Catalyst Fugitive Emission Calculations Added Components
MOC# 2286749 Omega Catalyst SCCV Replacements

Component Service	Number of Components			Emission Factors			LDAR Reductions	Emissions (lb/hr)		
	SOCMI Average (11%<C _{2c} <85%)	SOCMI without C _{2c} (C _{2c} < 11%)	SOCMI with C _{2c} (C _{2c} > 85%)	SOCMI Average (11%<C _{2c} <85%)	SOCMI without C _{2c} (C _{2c} < 11%)	SOCMI with C _{2c} (C _{2c} > 85%)	I/M Emission Credits (%)	SOCMI Average (11%<C _{2c} <85%)	SOCMI without C _{2c} (C _{2c} < 11%)	SOCMI with C _{2c} (C _{2c} > 85%)
Valves										
Gas/Vapor Valves	0	0	0	0.0132	0.0089	0.0258	97	0.00000	0.000000	0.00
Light Liquid Valves	0	0	0	0.0089	0.0035	0.0459	97	0.00000	0.000000	0.00
Heavy Liquid Valves	0	1	0	0.0005	0.0007	0.0005	0	0.00000	0.000700	0.00
Pumps										
Light Liquid Pumps	0	0	0	0.0439	0.0386	0.144	85	0.00000	0.000000	0.00
Heavy Liquid Pumps	0	0	0	0.019	0.0161	0.0046	0	0.00000	0.000000	0.00
Flanges/Connectors										
Gas/Vapor Flanges/Connectors	0	0	0	0.0039	0.0029	0.0053	97	0.00000	0.000000	0.00
Light Liquid Flanges/Connectors	0	0	0	0.0005	0.0005	0.0052	97	0.00000	0.000000	0.00
Heavy Liquid Flanges/Connectors	0	5	0	0.00007	0.00007	0.00007	30	0.00000	0.00025	0.00
Agitators	0	0	0	0.0439	0.0386	0.144	85	0.00000	0.000000	0.00
Compressors	0	0	0	0.5027	0.5027	0.5027	85	0.00000	0.000000	0.00
Relief Valve (Gas/Vapor)	0	0	0	0.2293	0.2293	0.2293	97	0.00000	0.000000	0.00
Open-ended Lines	0	0	0	0.0038	0.004	0.0075	97	0.00000	0.000000	0.00
Sampling Connections	0	0	0	0.033	0.033	0.033	97	0.00000	0.000000	0.00
* C _{2c} is Ethylene										
Total Emissions (lb/hr) =								0.00000	0.00095	0.000000
tons/yr =								0.00000	0.00414	0.000000

Hours of
Operation Per
Year for
Authorization
of Fugitive
Components
8760

Fugitive Emission Summary											
Component	VOC (Yes/No)	Weight* Percent	PBR Claimed	Distance to Receptor (ft)	L	K	RQ (lb/day)	Emission Limits		Emissions	
CATALYST - inorganic	No	37.54	Exempt	1948	N/A	N/A	N/A	lb/hr	tons/yr	lb/hr	tons/yr
Ethylene Glycol	No	59.15	106.262(a)(2)	1948	26	15.04	N/A	1.73	5.00	0.00035	0.00155
K2CO3 - inorganic	Yes	3.31	Exempt	1948	N/A	N/A	N/A	N/A	N/A	0.00056	0.00245
				N/A	N/A	N/A	N/A	N/A	N/A	0.00003	0.00014
				1220	103	29.6	N/A	N/A	N/A	0.00000	0.00000
				N/A	N/A	N/A	N/A	N/A	N/A	0.00000	0.00000
				N/A	N/A	N/A	N/A	N/A	N/A	0.00000	0.00000
				N/A	N/A	N/A	N/A	N/A	N/A	0.00000	0.00000
				N/A	N/A	N/A	N/A	N/A	N/A	0.00000	0.00000
				N/A	N/A	N/A	N/A	N/A	N/A	0.00000	0.00000
				N/A	N/A	N/A	N/A	N/A	N/A	0.00000	0.00000
Total		100.00						Total VOC =		0.00003	0.00014

CONFIDENTIAL BUSINESS INFORMATION

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Gulf Coast Growth Ventures
MEG (Non-EO)
Fugitive Emission Calculations Added Components
EPN G_FUG - MOC# 2291316 GAS01 Drain Pump

Component Service	Number of Components			Emission Factors			Reduction Emission Credits (%)	Emissions (lb/hr)		
	SOCMI Average (11% < C ₂ < 85 %)	SOCMI without C ₂ (C ₂ < 11%)	SOCMI with C ₂ (C ₂ > 85%)	SOCMI Average (11% < C ₂ < 85%)	SOCMI without C ₂ (C ₂ < 11%)	SOCMI with C ₂ (C ₂ > 85%)		SOCMI Average (11% < C ₂ < 85 %)	SOCMI without C ₂ (C ₂ < 11%)	SOCMI with C ₂ (C ₂ > 85%)
Valves										
Gas/Vapor Valves	0	0	0	0.0132	0.0089	0.0258	97	0.00000	0.000000	0.00
Light Liquid Valves	0	0	0	0.0089	0.0035	0.0459	97	0.00000	0.000000	0.00
Heavy Liquid Valves	0	0	0	0.0005	0.0007	0.0005	0	0.00000	0.000000	0.00
Pumps										
Light Liquid Pumps	0	1	0	0.0439	0.0386	0.144	85	0.00000	0.005790	0.00
Heavy Liquid Pumps	0	0	0	0.019	0.0161	0.0046	0	0.00000	0.000000	0.00
Flanges/Connectors										
Gas/Vapor Flanges/Connectors	0	0	0	0.0039	0.0029	0.0053	97	0.00000	0.000000	0.00
Light Liquid Flanges/Connectors	0	4	0	0.0005	0.0005	0.0052	97	0.00000	0.000060	0.00
Heavy Liquid Flanges/Connectors	0	0	0	0.00007	0.00007	0.00007	30	0.00000	0.000000	0.00
Agitators	0	0	0	0.0439	0.0386	0.144	85	0.00000	0.000000	0.00
Compressors	0	0	0	0.5027	0.5027	0.5027	85	0.00000	0.000000	0.00
Relief Valve (Gas/Vapor)	0	0	0	0.2293	0.2293	0.2293	97	0.00000	0.000000	0.00
Open-ended Lines	0	0	0	0.0038	0.004	0.0075	97	0.00000	0.000000	0.00
Sampling Connections	0	0	0	0.033	0.033	0.033	97	0.00000	0.000000	0.00
* C ₂ is Ethylene										
Total Emissions (lb/hr) =								0.00000	0.00585	0.000000
tons/gr =								0.00000	0.02562	0.000000

Number of
Operations
Per Year
for
Authorization
of
Fugitive
8760

Fugitive Emission Summary											FCEQ Workbook TAB Name	
Component	VOC (Yes/No)	Weight* Percent	PBR Claimed	Distance to Receptor (ft)	L	K	RQ (lb/dag)	Emission Limits		Emissions		
								lb/hr	tons/gr	lb/hr		tons/gr
Water	No	32.00	Exempt	1948	N/A	N/A	N/A	N/A	N/A	0.00187	0.00820	Exempt
Ethylene Glycol	Yes	68.00	106.262(a)(2)	1948	26	15.04	N/A	1.73	5.00	0.00398	0.01742	106.262(a)(2) TLV
Total		100.00						Total VOC =		0.00398	0.01742	

CONFIDENTIAL BUSINESS INFORMATION