

Impacts Review Summary

(1) Based on Receptor and Property Line Distances

(Is there a receptor or property line within the specified distance of the registration? The distances are 1/4 mile for PBR Level 1, 1/2 mile for PBR Level 2, and 1 mile for Standard Permit.)

Authorization selected for this site:	PBR Level 2	
Shortest distance in feet to any recepto facility/unit included in this registration	•	808.00 ft
Shortest distance in feet to any proper facility/unit included in this registration	•	50.00 ft

Based on the nearest receptor distance:	A full impacts review is required for Benzene.
Based on the nearest property line	A full impacts review is required for H2S, SO2, and NO2.

(2) Based on Net Project Emission Increases

(Are the net project emission increases less than any of the de-minimis rates?)

			Net Project Emission Increases								
	De-minimis	steady state	< 30 psig	≥ 30 psig							
	Rates (lb/hr)	lb/hr	periodic lb/hr	periodic lb/hr	TPY						
Benzene	0.0390	0.0155	0.2979	1.7447	0.0397						
H2S	0.0250	0.2528	0.4237	1.2140	0.3446						
SO2	2.0000	0.0000	0.0000	0.0000	0.0000						
NOX	4.0000	0.0000	0.0000	0.0000	0.0000						

Based on the net project emission increases:

A full impacts review is required for Benzene.

A full impacts review is required for H2S.

A full impacts review is NOT required for SO2.

A full impacts review is NOT required for NO2.

(3) Based on the Project Maximum Predicted Concentrations

(Are project max. predicted Benzene concentrations \leq 10% of the applicable effects screening level (ESL) or \leq 25% of the applicable ESL? Are project maximum predicted H2S, SO2, and NOX concentrations \leq the significant impact level, SIL, where SIL = 4% of the applicable ambient air standard (AAQS)?)

This exemption has not been considered.

(4) Based on the above assessment from (1) - (3):

A full impacts review is required for Benzene. Please see Benzene impacts table for detailed evaluation.

A full impacts review is required for H2S. Please see H2S impacts table for detailed evaluation.

A full impacts review is NOT required for SO2.

A full impacts review is NOT required for NO2.

Full Impacts Review - Benzene

	Benzene Hourly Steady State - Impact Review										
EPN Tanks	FIN Tanks	Source Name All Storage Tanks	TCEQ Impacts table corresponding to EPN	Steady state hourly estimated emissions (Ib/hr) 2.0E-01	WREPNX 9.9E-01	ESLbenzene, short term (µg/m3)	Distance to nearest receptor (ft) 808.00	Height of emission release point (ft)	GEPNx 155.8	Emax, EPNx, hourly, steadystate (lb/hr) 1.1E+00	
FUG	FUG	Equipment Fugitives		1.8E-03	8.8E-03	170	808.00	3	250.2	6.0E-03	
	Benzene Hourly S	teady State - Impacts R	eview Summary	Eestimated, total, hourly,			1	Emax, total, hourly, steadystate (lb/hr) 1.09E+00			

Notes

 ${\bf 1.}\ \ {\bf Please}\ refer\ to\ individual\ emissions\ calculation\ tables\ for\ steady-state\ emission\ rates\ information.$

Full Impacts Review - Benzene

			Benzene Hourly Low Pr	essure Periodic	- Impact Re	eview				
EPN	FIN	Source Name	TCEQ Impacts table corresponding to EPN	LP Periodic hourly estimated emissions (lb/hr)	WREPNx	ESLbenzene, short term (μg/m3)	Distance to nearest receptor (ft)	Height of emission release point (ft)	GEPNx	Emax, EPNx, hourly, LP periodic (lb/hr)
Tanks	Tanks	All Storage Tanks	Tank Hatch	2.0E-01	5.2E-01	170	808.00	20	155.8	5.7E-01
TRUCK1	TRUCK1	PW Loading - Normal Ops - Colin W. Johnson Unit A 1	Loading	1.2E-03	3.0E-03	170	808.00	10	287.4	1.8E-03
MSS	TRUCK2	MSS Loading - Blowcase MSS / AOS - Colin W. Johnson Unit A 1	Loading	8.9E-02	2.3E-01	170	808.00	10	287.4	1.4E-01
TRUCK3	TRUCK3	PW Loading - Normal Ops - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	Loading	2.3E-03	6.0E-03	170	808.00	10	287.4	3.6E-03
MSS	TRUCK4	MSS Loading - Blowcase MSS / AOS - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	Loading	8.9E-02	2.3E-01	170	808.00	10	287.4	1.4E-01
FUG	FUG	Equipment Fugitives	Fugitive	1.8E-03	4.6E-03	170	808.00	3	250.2	3.2E-03
MSS	MSS-Tank Degas	Tank Degas	Low P. Blowd./Purg./Pig.	2.0E-03	5.1E-03	170	808.00	20	209.5	4.1E-03
			Eestimated, total, hourly, LP periodic (lb/hr) 3.88E-01	Total 100%		Pass			Emax, total, hourly, LP periodic (lb/hr) 8.54E-01	

 $^{1. \ \} Periodic \ emissions \ impacts \ table \ has \ been \ setup \ to \ conservatively \ include \ both \ steady-state \ and \ periodic \ emissions.$

Full Impacts Review - Benzene

			Benzene Hourly High	Pressure Perio	dic - Impact	t Review				
EPN	FIN	Source Name	TCEQ Impacts table corresponding to EPN	HP Periodic hourly estimated emissions (lb/hr)	WREPNx	ESLbenzene, short term (μg/m3)	Distance to nearest receptor (ft)	Height of emission release point (ft)	GEPNx	Emax, EPNx, hourly, HP periodic (lb/hr)
Tanks	Tanks	All Storage Tanks	Tank Hatch	2.0E-01	1.1E-01	170	808.00	20	155.8	1.2E-01
TRUCK1	TRUCK1	PW Loading - Normal Ops - Colin W. Johnson Unit A 1	Loading	1.2E-03	6.4E-04	170	808.00	10	287.4	3.8E-04
MSS	TRUCK2	MSS Loading - Blowcase MSS / AOS - Colin W. Johnson Unit A 1	Loading	8.9E-02	4.8E-02	170	808.00	10	287.4	2.9E-02
TRUCK3	TRUCK3	PW Loading - Normal Ops - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	Loading	2.3E-03	1.3E-03	170	808.00	10	287.4	7.5E-04
MSS	TRUCK4	MSS Loading - Blowcase MSS / AOS - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	Loading	8.9E-02	4.8E-02	170	808.00	10	287.4	2.9E-02
FUG	FUG	Equipment Fugitives	Fugitive	1.8E-03	9.8E-04	170	808.00	3	250.2	6.7E-04
MSS	MSS-Tank Degas	NF Tank Degas	Low P. Blowd./Purg./Pig.	2.0E-03	1.1E-03	170	808.00	20	209.5	8.8E-04
MSS-SEP-1	MSS-SEP-1	MSS Sep 1 Maintenance - Colin W. Johnson Unit A 1	High P. Blowd./Purg./Pig.	4.8E-01	2.6E-01	170	808.00	10	23.9	1.9E+00
MSS-SEP-2	MSS-SEP-2	MSS Sep 2 Maintenance - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	High P. Blowd./Purg./Pig.	9.6E-01	5.3E-01	170	808.00	10	23.9	3.7E+00
Benzene Hourly High Pressure Periodic - Impacts Review Summary			Eestimated, total, hourly, HP periodic (lb/hr) 1.83E+00	Total 100 %	Pass			Emax, total, hourly, HP periodic (lb/hr) 5.79E+00		

Notes

 $1. \ \ Periodic \ emissions \ impacts \ table \ has \ been \ setup \ to \ conservatively \ include \ both \ steady-state \ and \ periodic \ emissions.$

Full Impacts Review - Benzene

			Benzene An	nual - Impact R	eview					
EPN	FIN	Source Name	TCEQ Impacts table corresponding to EPN	Annual estimated emissions (tpy)	WREPNx	ESLbenzene, long term (µg/m3)	Distance to nearest receptor (ft)	Height of emission release point (ft)	GEPNx	Emax,EPNx,
Tanks	Tanks	All Storage Tanks	Tank Hatch	2.9E-02	7.2E-01	4.5	808.00	20	155.8	1.1E+00
TRUCK1	TRUCK1	PW Loading - Normal Ops - Colin W. Johnson Unit A 1	Loading	1.4E-04	3.4E-03	4.5	808.00	10	287.4	1.1E-04
MSS	TRUCK2	MSS Loading - Blowcase MSS / AOS - Colin W. Johnson Unit A 1	Loading	8.1E-05	2.0E-03	4.5	808.00	10	287.4	5.1E-07
TRUCK3	TRUCK3	PW Loading - Normal Ops - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	Loading	1.0E-04	2.6E-03	4.5	808.00	10	287.4	3.1E-05
MSS	TRUCK4	MSS Loading - Blowcase MSS / AOS - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	Loading	6.5E-05	1.6E-03	4.5	808.00	10	287.4	3.3E-07
FUG	FUG	Equipment Fugitives	Fugitive	7.9E-03	2.0E-01	4.5	808.00	3	250.2	2.0E-01
MSS	MSS-Tank Degas	NF Tank Degas	Low P. Blowd./Purg./Pig.	3.4E-05	8.5E-04	4.5	808.00	20	209.5	1.6E-05
MSS-SEP-1	MSS-SEP-1	MSS Sep 1 Maintenance - Colin W. Johnson Unit A 1	High P. Blowd./Purg./Pig.	9.6E-04	2.4E-02	4.5	808.00	10	23.9	1.1E-04
MSS-SEP-2	MSS-SEP-2	MSS Sep 2 Maintenance - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	High P. Blowd./Purg./Pig.	1.9E-03	4.9E-02	4.5	808.00	10	23.9	2.3E-04
Benzene Annual Emissions - Impacts Review Summary				Eestimated, total, annual (tpy) 3.97E-02	Total 100%	Pass			Emax, total, annual (tpy) 1.33E+00	

Notes

1. Please refer to individual emissions calculation tables for annual emission rates information.

Full Impacts Review - H2S

WREPNx 1.0E+00	hourly (μg/m3)	Distance to nearest property line (ft)	Height of emission release point (ft)	GEPNx	Emax,EPNx, hourly, steadystate (lb/hr)
1.0F+00				CLITTA	(10/111)
1.02100	108	50.00	20	183.0	5.9E-01
2.7E-03	108	50.00	3	2,625.0	1.1E-04
Total		Pa	ass		Emax,total, hourly, steadystate (lb/hr) 5.89E-01
		Total	Total		Total

 $^{{\}bf 1.}\ \ {\bf Please}\ \ {\bf refer}\ \ {\bf to}\ \ {\bf individual}\ \ {\bf emission}\ \ {\bf calculation}\ \ {\bf tables}\ \ {\bf for}\ \ {\bf steady-state}\ \ {\bf emission}\ \ {\bf rates}\ \ {\bf information}.$

Full Impacts Review - H2S

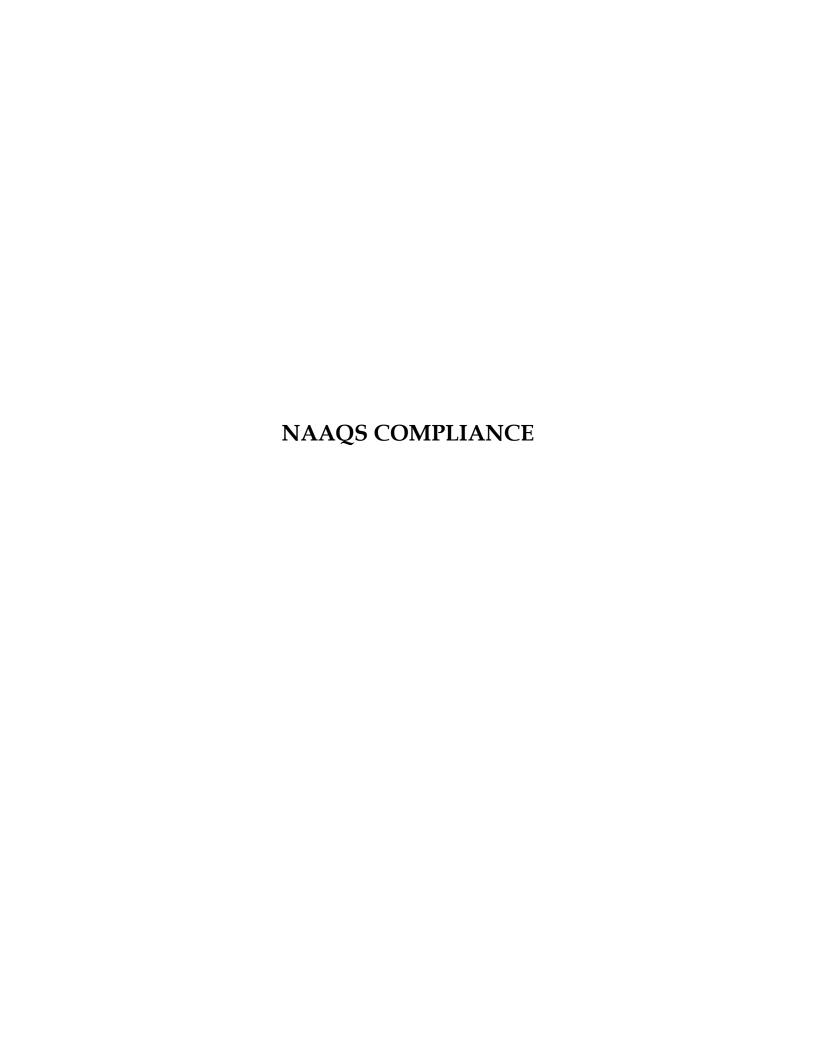
			H2S Hourly Low Pressu	re Periodic - Impac	t Review					
EPN	FIN	Source Name	TCEQ Impacts table corresponding to EPN	LP Periodic hourly emissions (lb/hr)	WREPNx	AAQSH2S, hourly (μg/m3)	Distance to nearest property line (ft)	Height of emission release point (ft)	GEPNx	Emax,EPNx, hourly, LP periodic (lb/hr)
Tanks	Tanks	All Storage Tanks	Tank Hatch	3.0E-01	7.1E-01	108	50.00	20	183.0	4.2E-01
TRUCK1	TRUCK1	PW Loading - Normal Ops - Colin W. Johnson Unit A 1	Loading	3.2E-02	7.6E-02	108	50.00	10	739.2	1.1E-02
MSS	TRUCK2	MSS Loading - Blowcase MSS / AOS - Colin W. Johnson Unit A 1	Loading	2.4E-02	0.0E+00	108	50.00	10	739.2	0.0E+00
TRUCK3	TRUCK3	PW Loading - Normal Ops - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	Loading	6.4E-02	1.5E-01	108	50.00	10	739.2	2.2E-02
MSS	TRUCK4	MSS Loading - Blowcase MSS / AOS - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	Loading	2.4E-02	5.7E-02	108	50.00	10	739.2	8.3E-03
FUG	FUG	Equipment Fugitives	Fugitive	8.1E-04	1.9E-03	108	50.00	3	2,625.0	7.9E-05
MSS	MSS-Tank Degas	Tank Degas	Low P. Blowd./Purg./Pig.	5.4E-04	1.3E-03	108	50.00	20	244.0	5.7E-04
	H2S Hourly Low Pressure Periodic - Impacts Review Summary			Eestimated, hourly, LP periodic (lb/hr) 4.24E-01	Total	-	Pa	ıss		Emax, hourly, LP periodic (lb/hr) 4.63E-01

^{1.} Periodic emissions impacts tables have been setup to conservatively include both steady-state and periodic emissions that could occur simultaneously any given hour. For periodic emissions activities that would not occur simultaneously in a given hour, the emissions activity with the highest emission rate has been considered for the impacts evaluation.

Full Impacts Review - H2S

			H2S Hourly High Press	ure Periodic - Impac	t Review					
EPN	FIN	Source Name	TCEQ Impacts table corresponding to EPN	HP Periodic hourly emissions (lb/hr)	WREPNx	AAQSH2S, hourly (µg/m3)	Distance to nearest property line (ft)	Height of emission release point (ft)	GEPNx	Emax,EPNx, hourly, HP periodic (lb/hr)
Tanks	Tanks	All Storage Tanks	Tank Hatch	3.0E-01	2.5E-01	108	50.00	20	183.0	1.5E-01
TRUCK1	TRUCK1	PW Loading - Normal Ops - Colin W. Johnson Unit A 1	Loading	3.2E-02	2.6E-02	108	50.00	10	739.2	3.9E-03
MSS	TRUCK2	MSS Loading - Blowcase MSS / AOS - Colin W. Johnson Unit A 1	Loading	2.4E-02	0.0E+00	108	50.00	10	739.2	0.0E+00
TRUCK3	TRUCK3	PW Loading - Normal Ops - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	Loading	6.4E-02	5.3E-02	108	50.00	10	739.2	7.7E-03
MSS	TRUCK4	MSS Loading - Blowcase MSS / AOS - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	Loading	2.4E-02	2.0E-02	108	50.00	10	739.2	2.9E-03
FUG	FUG	Equipment Fugitives	Fugitive	8.1E-04	6.7E-04	108	50.00	3	2,625.0	2.8E-05
MSS	MSS-Tank Degas	NF Tank Degas	Low P. Blowd./Purg./Pig.	5.4E-04	4.5E-04	108	50.00	20	244.0	2.0E-04
MSS-SEP-1	MSS-SEP-1	MSS Sep 1 Maintenance - Colin W. Johnson Unit A 1	High P. Blowd./Purg./Pig.	2.6E-01	2.2E-01	108	50.00	10	25.0	9.4E-01
MSS-SEP-2	MSS-SEP-2	MSS Sep 2 Maintenance - Spear Reynolds Unit F 1 and Colin W. Johnson Unit B 1	High P. Blowd./Purg./Pig.	5.3E-01	4.3E-01	108	50.00	10	25.0	1.9E+00
H2S Hourly High Pressure Periodic - Impacts Review Summary			Eestimated, hourly, HP periodic (lb/hr) 1.21E+00	Total		Pa	ıss		Emax, hourly, HP periodic (lb/hr) 2.97E+00	

^{1.} Periodic emissions impacts tables have been setup to conservatively include both steady-state and periodic emissions that could occur simultaneously any given hour. For periodic emissions activities that would not occur simultaneously in a given hour, the emissions activity with the highest emission rate has been considered for the impacts evaluation.



Screen3 Modeling - 1-Hour and Annual NO2

Inputs and Assumptions	
County	Karnes
Ambient Temperature	293
Receptor Height	0
Urban/Rural	Rural
Building Downwash	No
Full Meteorology	Yes
Automated Distance Array	Yes
Terrain Height Above Stack Base	0

Modeled Results - 1-Hour NO2	
Modeled NO2 1-Hour Concentration (μg/m3)	0.00
Background NO2 1-Hour Concentration (μg/m3)	70.00
Total NO2 1-Hour Concentration (μg/m3)	70.00
NO2 Hourly NAAQS (µg/m3)	188
Does Site Meet 1-Hour NO2 NAAQS?	Pass

Modeled Results - Annual NO2	
Modeled NO2 Annual Concentration (μg/m3)	0.00
Background NO2 Annual Concentration (μg/m3)	20.00
Total NO2 Annual Concentration (μg/m3)	20.00
NO2 Annual NAAQS (μg/m3)	100
Does Site Meet Annual NO2 NAAQS?	Pass

Notes

1. The site is assumed to be in compliance with NO2 NAAQS due to the absence of any significant NOx emissions sources.

Screen3 Modeling - 1-Hour, 3-Hour, 24-Hour, and Annual SO2

Inputs and Assumptions	
County	Karnes
Ambient Temperature	293
Receptor Height	0
Urban/Rural	Rural
Building Downwash	No
Full Meteorology	Yes
Automated Distance Array	Yes
Terrain Height Above Stack Base	0

Modeled Results - 1-Hour SO2	
Modeled SO2 Concentration (μg/m3)	0.00
Background Concentration (µg/m3)	50.00
Total SO2 Concentration (μg/m3)	50.00
SO2 NAAQS (μg/m3)	196
Does Site Meet 1-Hr SO2 NAAQS?	Pass

Modeled Results - 3-Hour SO2	
Modeled SO2 Concentration (μg/m3)	0.00
Background Concentration (μg/m3)	130.00
Total SO2 Concentration (μg/m3)	130.00
SO2 NAAQS (µg/m3)	1300
Does Site Meet 3-Hour SO2 NAAQS?	Pass

Modeled Results - 24-Hour SO2	
Modeled SO2 Concentration (μg/m3)	0.00
Background Concentration (μg/m3)	36.00
Total SO2 Concentration (μg/m3)	36.00
SO2 NAAQS (µg/m3)	365
Does Site Meet 24-Hour SO2 NAAQS?	Pass

Modeled Results - Annual SO2	
Modeled SO2 Concentration (µg/m3)	0.00
Background Concentration (µg/m3)	8.00
Total SO2 Concentration (μg/m3)	8.00
SO2 NAAQS (μg/m3)	80
Does Site Meet Annual SO2 NAAQS?	Pass

Notes

1. The site is assumed to be in compliance with SO2 NAAQS due to the absence of any significant SO2 emissions sources.