AIR|HM0014N|RN102176377|6051|PA

TEXAS NATURAL RESOURCE CONSERVATION COMMISSION

Protecting Texas by Reducing and Preventing Pollution

February 22, 1999

LaDonna Castañuela, Chief Clerk
Texas Natural Resource Conservation Commission
P. O. Box 13087
Austin, Texas 78711-3087

Re: Application by Dynegy Midstream, Inc. for renewals of Permits #6051 and 6052

Dear Ms. Castañuela:

Enclosed please find the original and eleven true and correct copies of the Office of Public Assistance's response to questions and comments voiced at a public meeting held on the above-referenced matter on October 8, 1998.

Thank you for your assistance in this matter. If you have any questions, please contact me at 239-4085.

Sincerely,

Jodena N. Henneke

Jodena N. Henneke, Director
Office of Public Assistance

Enclosures
cc: Mailing List

MAILING LIST
Applicant Name: Dynegy Midstream, Inc.
Permit #6051 and 6052
Docket #

FOR THE APPLICANT:

Mr. Ananthakrishna Shankar, P.E.
Senior Environmental Engineer
Dynegy Midstream Services, L.P.
1000 Louisiana Street, Suite 5800
Houston, Texas 77002
713-507-6753
713-767-0070 (Fax)

FOR THE EXECUTIVE DIRECTOR:

Ms. Terry Salem, Staff Attorney
TNRCC Legal Division MC 173
P. O. Box 13087
Austin, Texas 78711-3087
512/239-0600 FAX 512/239-0606

Mr. Tim Friday
Air New Source Review Permits Division MC 162
P. O. Box 13087
Austin, Texas 78711-3087
512/239-1250 FAX 512/239-1300

FOR THE CHIEF CLERK:

Docket Clerk
TNRCC Chief Clerk's Office MC 105
P. O. Box 13087
Austin, Texas 78711-3087
512/239-3300 FAX 512/239-1223

FOR THE OFFICE OF PUBLIC ASSISTANCE:

Mr. Howard Houston
TNRCC Office of Public Assistance MC 108
P. O. Box 13087
Austin, Texas 78711-3087
800/687-4040

FOR THE ALTERNATIVE DISPUTE RESOLUTION OFFICE:

Mr. Carl Forrester, Director
TNRCC Alternative Dispute Resolution MC 222
P. O. Box 13087
Austin, Texas 78711-3087
512/239-4010 FAX 512/239-4015

FOR THE OFFICE OF THE PUBLIC INTEREST COUNSEL:

Mr. Blas J. Coy, Jr.
Public Interest Counsel
MC 103
P. O. Box 13087
Austin, Texas 78711-3087
512/239-6363 FAX 512/239-6377

PROTESTANTS/INTERESTED PERSONS:

See attachment.

PATRICIA GIBSON
15464 MORNINGSTAR CIR
EUSTACE TX 75124

SALLY CARDENAS
13276 CR 2922
EUSTACE TX 75124

MARY LEE ROEHMAN
331 MEREDITH
EUSTACE TX 75124

ANGEL TERRY
10388 CR 2504
EUSTACE TX 75124

EARNESTINE TERRY
10386 CR 2504
EUSTACE TX 75124

JOHN AIKEN
1232 GOODALL RD
EUSTACE TX 75124

RESIDENT
13640 CR 2919
EUSTACE TX 75124

MICHAEL SMITH
8686 HWY 198
PAYNE SPRINGS TX 75147

TAYNA SELBY
137 WILLOWWOOD
MABANK TX 75147

R E DENNIS
11222 CEDAR DR
MABANK TX 75147

W R & MARY ALICE FISHER, JR
14807 GOLIAD DR
MALAKOFF TX 75148

ROWENA MEIERHEAD
208 SHERWOOD
GUN BARREL CITY TX 75147

TUCKER FAMILY
174 MEADOW LAKE
GUN BARREL CITY TX 75147

THOMAS EASON
201 SPRING CREEK
KEMP TX 75143

VICKI SEBASTIAN
4128 CHEROKEE
MABANK TX 75147

GLENDA CROSTLOW
ROUTE 9 BOX 499
KEMP TX 75143

RESIDENT
6205 POINT LA VISTA
MALAKOFF TX 75148

DONALD SCHULTZ
4114 LAKEVIEW
GUN BARREL TX 75147

LYNN CLAVENS
266 NOB HILL
KEMP TX 75143

KATIE JOSLIN
176 OCEAN DR
MABANK TX

KARL HAMBRICK
249 S CHEROKEE SHORES DR
MABANK TX 75147

LATICIA
APT 102
3820 W WALNUT
GARLAND TX 75142

CHRISTY LINDSEY
103 N 316
EUSTACE TX 75124

CAROL HENNY
17125 CR 2938
EUSTACE TX 75124

SAMMYE SCHULTZ
526 FOSTER
CANTON TX 75103

MICHAEL MELTON
PO BOX 176
CR 2930
MABANK TX 75147

LOUISE BLANKENSHIP
ROUTE 7 BOX 951
KEMP TX 75143

FAYE SPERRING
2403 WILDWOOD WAY
KEMP TX 75143

JEWELL TORINS
2402 WILDWOOD WAY
KEMP TX 75143

HILDA HARRINGTON
2012 WILDWOOD WAY
KEMP TX 75143

ERIC HURLEY
PÖ BOX 43572
SEVEN POINTS TX 75234

DARREL & JEANIE POSEY
262 OVERLOOK TR
GUN BARREL CITY TX 75147

RESIDENT
ROUTE 7 BOX 4593
ATHENS TX 75751

JOE & MARGARET MURRAY
115 HARRIS BLVD
MALAKOFF TX 75148

MARY BUSBY
PO BOX 43495
KEMP TX 75143

TROY INGRAM
243 SCENIC RD
TRINIDAD TX 75143

DEZA HAMILTON
ROUTE 9 BOX 187
TOOL TX 75143

EVANS FAMILY
ROUTE 7 BOX 1076
KEMP TX 75143

WILLIAM & DOROTHY KENDALL
ROUTE 6 BOX 418
KEMP TX 75143

SAM & IRA DENNISON
PO BOX 43400
TOOL TX 75143

LONNIE & KAREN MEDDERS
5879 SHADY LANE
EUSTACE TX 75124

JAMES D TOTOM
2012 CR 4043
KEMP TX 75143

RESIDENT
PO BOX 512
MABANK TX 75147

ANGIE MARAGGIE
139 WILD GROVE
GUN BARREL TX 75147

TAYLOR FAMILY
ROUTE 7 BOX 800E
KEMP TX 75143

ROGER GILBREATH
912 CEDAR CREST
TOOL TX 75143

GARY ABBEY
997 CEDAR CREST
TOOL TX 75143

DELLA JOHNSON
ROUTE 6 BOX 428
KEMP TX 75143

NITA
804 OXFORD
CORSICANA TX 75110

LESLIE SAENZ
214 WILD GROVE
GUNBARREL TX 75147

THOMAS D MANN
145 BEECHWOOD
MABANK TX 75147

JOHN DAWSON
164 SANTA MARIA
MABANK TX 75147

DEBORAH PHILLIPS
APT 800
300 LEGENDAREZ LN
GUN BARREL TX 75147

BART VAUGHAN
120 RINC BLOOM
GUN BARREL CITY TX 75147

DONNA BOWLAND
145 WOODLAND TR
GUN BARREL CITY TX 75147

RESIDENT
PO BOX 685
MALAKOFF TX 75148

ROY CORNWELL
145 ROBINHOOD WAY
GUN BARREL CITY TX 75147

DEE ANN BAKER
PO BOX 5477
MABANK TX 75147

CITIZEN
103 BENNERT PT.
GUN BARREL CITY TX 75147

SHIRLEY ANTHONY
PO BOX 89
KEMP TX 75143

POWELL FAMILY
PO BOX 321-A ROUTE 6
KEMP TX 75143

EUGENE E CLARK
ROUTE 2 BOX 3034
KEMP TX 75143

PAT MCCLURE
105 DOUGLAS DR
MABANK TX 75147

TINA JENNINGS
ROUTE 8 BOX 1054
SEVEN POINTS TX 75143

HARMON / LOUIS GUTHRIE
P O BOX 114
EUSTACE TX 75124

KAREN/ BOB SPENCE
12 FOREST RIDGE
TRINIDAD TX 75163

BRUCE / CHRIS/ KIM TEMPLE
P O BOX 43141
SEVEN POINTS TX 75143

TERRY NESBITT
8098 CR 2813
EUSTACE TX 75124

MIKE JORGENSEN
4109 LAKEVIEW
TEXAS 75147

PAT MISHER
4403 KIRBY RD
CANEY CITY TX 75148

WANDA BAKER
250 WHISPERING TR
GUN BARREL CITY TX 75147

BOB & EVELYN HOBBS
ROUTE 6 BOX 793
TOOL TX 75743

R W HUDGENS
ROUTE 3 BOX 384
KEMP TX 75143

DOROTHY SAMPLA
2016 WILDWOOD WAY
KEMP TX 75143

DIAN SANDERS
RT 6 BOX 799
TOOL TX 75143

CAROL PRICE
RT 6 BOX 612
KEMP TX 75143

JOHN / MILLIE BALLARD
P O BOX 616
EUSTACE TX 75124

PAULA MARTIN
18273 ROCKY POINT RUN
MABANK TX 75147

SHERRY WEBSTER
395 GOLDENS OAKS
MABANK TX 75147

EDWARD JONES
219 PERICE
PAYNE SPRINGS TX 75124

SUE JENZAKE
251 W ACRES
MABANK TX 75147

LAURA HENDERSON
ROUTE 9 BOX 187
TOOL TX 75743

JO ANN
15390 S FIRST ST
SCURRY TX 75158

PAULINE CHAPMAN
1006 BEVERLY CT
KEMP TX 75143

RICHARD / LELA SMITHEY
2103 WILDWOOD WAY
KEMP TX 75143

THOMAS / DAWNA CARLSON
423 COCKRELL
EUSTACE TX 75124

LEWIS / DEBBIE BURROWS
155 LAKE DRIVE
MABANK TX 75147

JAMES / MARY BLACK
110 PIN OAK DR
SUMMERALL ADDITION
MABANK TX 75147

SANDY WATSON
14017 ALAMO RD
LOG CABIN TX 75148

CHRISTY SPENCE
716 S GAN BRUDIN
GUM BARRELL TX 75147

APRIL GREENE
316 FMS
EUSTACE TX 75124

A / NANCY BASS
P O BOX 1870
MABANK TX 75147

DONALD JONES
111 B ARBOLABO
GUN BARREL CITY TX 75147

ADAM PELAUGHTER
RT 3 BOX 239B
KEMP TX 75143

ERICKA CORANT
136 GARNER
MABANK TX 75147

TONYA POPE
6119 CHEYNNE TRL
MABANK TX 75147

JIM SWINDLE
6188 CHEROKEE TRL
MABANK TX 75147

VICKI SABASTIN
4128 CHEROKEE
MABANK TX 75147

JACK BENTLY
P O BOX 525 FM 3396
KEMP TX 75143

MARY RO WAYS
308 BLUE BONNET
TRINIDAD TX 75163

MICHELE WHITE
RT 3 BOX 494
MABANK TX 75147

SAGE GRYDER
112 PURTIS CREEK ST
EUSTACE TX 75124

KENNETH / SHIRLEY JOHNSON
P O BOX 58
EUSTACE TX 75124

JAYNES DOUNING
1773 OTER RACE
KEMP TX 75143

JOYCE MILLER
P O BOX 608
MABANK TX 75147

LILA PROPHETT
235 SHAWNEE CR
MABANK TX 75147

MARY KAHANEK
336 ARNOLD HILLS
TOOL TX 75143

NED / LINDA MULLINS
RT 8 BOX 1070
KEMP TX 75143

H L CRUTCHFIELD
RT 7 BOX 768
KEMP TX 75143

W R DAVIS
RT 2 BOX 588
KEMP TX 75143

JERI HARLAN
37 CARSON
PAYNE SPRINGS TX 75147

KEITH / BRENDA WAYNE
9661 CR 2813
EUSTACE TX 75124

JERRIE MAYS
22 WOODS SOUTH
TRINIDAD TX 75163

ERMA PETERSON
RT 9 BOX 542
KEMP TX 75143

CATHY GIRARD
119 BAYVIEW
MABANK TX 75147

JOYCE KNINO
RT 3 BOX 290B
KRMP TX 75143

AMANDA TAYLOR
4263 LAKESIDE DR
MABANK TX 75147

DAVID / KELLY KIRTHLEY
P O BOX 43434
KEMP TX 75143

JANICE MAY
305 BLUE BONNET
TRINIDAD TX 75163

SANDRA MORRIS
311 TRINITY HILLS
KEMP TX 75143

ESTER MENIBORN
P O BOX 641
MALAKOFF TX 75148

LAVERNE PERKINS
P O BOX 97
MALAKOFF TX 75148

ANDY JACKSON
175 SHERILINE DR
MALAKOFF TX 75148

BRIE / CINDY BETTS
11087 ELM
EUSTACE TX 75124

ALICE HAMMONDS
356 MARTHEAD RD
MABANK TX 75147

NEAL JENNINGS
108 LU ANN WAY
MABANK TX 75147

DAPHINE SMITH
184 INIDIAN GAP
MABANK TX 75147

ARDUE MAPLE
110 MERLIN DR
MABANK TX 75147

BRENDA WILSON
107 PLEASANT TRLS
MABANK TX 75147

JACKIE BAKER
103 HUB OF THE HILL
MABANK TX 75147

EDWIN FRON
965 CEDAR CREST
TOOL TX 75143

CONNIE STEAGALL
RT 3 BOX 243A
TOOL TX 75143

BETTY DAVIS
RT 2 BOX 6653 HILLCREST
MABANK TX 75147

LINDA PRINGLE
950 KINGSWAY
TOOL TX 75143

JERRY KITCHENS
P O BOX 24
TRINIDAD TX 75163

GEORGIE GEIST
RT 9 BOX 1229
7-POINT TX 75143

WM MOORE
RT 9 BOX 1270
KEMP TX 75143

OLIVER HAGEN
104 SUNSET COVE
TRINIDAD TX 75163

KATHY WILLIAMS
RT 3 BOX 67E
TOOL TX 75143

GARY RITTER
P O BOX 43548
7-POINT TX 75143

DIANN PRYOR
RT 7 BOX 810
KEMP TX 75143

RITA GALWAY
1114 ROLLING OAKS
KEMP TX 75143

TEMPEST STANFIELD
RT 5
KEMP TX 75143

CATHLINE DUBONG
2204 ROLLING OAKS
KEMP TX 75143

THOMAS HOWARD
2105 ROLLING OAKS
KEMP TX 75143

VADA WILLIAMS
RT 2 BOX 607
KEMP TX 75143

CITIZEN
19984 PATRICIA DR
KEMP TX 75143

CITIZEN
27 SUNDOWN TR
STAR HARBOR TX 75148

O R / VIOLA PERDUE JR
51 SUNSET BLVD S H
MALAKOFF TX 75148

CC / BARBARA CREACH
250 BUSHWHACKER DRIVE
MABANK TX 75147

WAYNE McCREARY JR
109 SUMMER LN
MABANK TX 75147

DEBRA FLAKE
12330 CR 2906
EUSTACE TX 75124

SANDRA ROBERTS
P O BOX 1558
MABANK TX 75147

RICHARD / MAE BUSBY
RT 3 BOX 306
MABANK TX 75147

LISA YATES
RT 3 BOX 306
MABANK TX 75147

DAWN GILLAM
18765 SACP WOODS
EUSTACE TX 75124

ROBERT HAN
7163 S ALGERDOU
MABANK TX 75147

MARY TYSON
BOX 144
KEMP TX 75143

TONYA PATTON
100 CEDAR BEND
TRINIDAD TX 75163

CRYSTAL STOCKMAN
205 WHITE FALL DR
MABANK TX 75147

GERRY McCHANG
1150 CT
KEMP TX 75147

LISA STEWART
71 SPILLVIEW ACRES
TRINIDAD TX 75163

ALICE TAYLOR
306 LAZY CANE RANCH RD
TRINIDAD TX 75163

DIANA COLLINS
RT 2 BOX 6653
MABANK TX 75147

ANNA TYO
211 SAND HILLS
EUSTACE TX 75124

PHIL WHITWORT/WANDA STRAHAN
271 EARNIS RD
GUN BARREL TX 75147

CHRISTINE SIRA
RT 9 BOX 515
TOOL TX 75143

PAULINE FOREST
RT 9 BOX 170
KEMP TX 75143

MR/MRS. HOGUE
RT 8 BOX 1054 A
KEMP TX 75143

STEVE / MISTI GRIFFRITS
RT 6 BOX 956
KEMP TX 75143

ALLEN HENDERSON
RT 5 BOX 586
KEMP TX 75143

LYNN GROOM
103 ANCHORAGE
TOOL TX 75143

CITIZEN
19984 PATRICIA DR
KEMP TX 75143

RALPH CARTS
412 COLLEGE ST
MALAKOFF TX 75148

CITIZEN
27 SUNDOWN TR
STAR HARBOR TX 75148

MILLICENT HOFFMAN
102 STADIUM
MALAKOFF TX 75148

ANGEL STRAWN
P O BOX 222
MALAKOFF TX 75148

NATHAN BROWN
521 MALIBU
MALAKOFF TX 75148

JENNIFER BELL
P O BOX 538
EUSTACE TX 75124

ROBERT PERIA
121 EASTERN HILLS
MABANK TX 75147

AMY SCHULTZ
4114 LAKEVIEW
GUN BARREL TX 75147

SID McFALL
RT 9 BOX 172B
KEMP TX 75143

A BUSH
192 SUNRAY
MABANK TX 75147

BILLY BARBER
109 JOYCE COVE
MABANK TX 75147

HELEN DAVIS
110 DANEL
MABANK TX 75147

TANNY BOOTHE
RT 9 BOX 165
KEMP TX 75143

BOBBY SMITH
RT 3 BOX 377
KEMP TX 75143

LYNDA FREDERICK
144 VAN HORN
MABANK TX 75147

KENNETH McMINN
122 TIMBER CREST DR
GUN BARREL TX 75147

SHIRLEY / GEORGE CLICK
1125 WILDWOOD WAY
TOOL TX 75143

CAROLYN DAVIS
101 SUNDRIFT
MABANK TX 75147

JERRIE MAYO
22 WOODS SOUTH
TRINIDAD TX 75163

JANA BLACK
431 MASTHEAD
MABANK TX 75147

TRAE GREBEL
205 WHITEFACE DR
MABANK TX 75147

TONYA / JESSICA COX
RT 9 BOX 1192
KEMP TX 75143

SHARON BURN
P O BOX 1049
KEMP TX 75143

GREG DAIR
101 SUNDRIFT
MABANK TX 75147

CHARLES BAXTER
RT 9 BOX 1222 C
KEMP TX 75143

BETTY NEWBAUER
154 OAK WILLS
MABANK TX 75147

BETTY SMITH
RT 7 BOX 67
MABANK TX 75147

CHAD ROBERTSON
RT 7 BOX 67
MABANK TX 75147

CHARLES / SANDY KENNEDY
503 KELLY LN
7-POINTS TX 75143

JO INGRAM
LAKEWOOD SUBDIVISION
TRINIDAD TX 75163

CORY HARRIS
RT 3 BOX 714
TOOL TX 75143

KEITH WOOD
OLD RIVER RD
TRINIDAD TX 75163

ROBERT FOUST
7126 NATCHEZ TR
MABANK TX 75147

JA CRISHA KEELING
BOX 564
EUSTACE TX 75124

ANNA COTTON
256 SUNRAY
MABANK TX 75147

HAROLD WOOD
11950 HWY 31 E
MALAKOFF TX 75148

PATTY WATKIN
101 CARSON RD
MABANK TX 75147

JAMES FRANKS
221 E MAIN ST
GUN BARREL TX 75147

ASHLEY RENEE ROBERTS
P. O. BOX 1558
MABANK, TEXAS 75147

DOLORES DELLER
337 BEACHSIDE DRIVE
TRINIDAD, TEXAS 75163

JOHNNY RAY CLEMENTS
ELECTRIC & INSTRUMENT SVC
185 CEDAR OAKS DRIVE
MABANK, TEXAS 75147

HELEN N LUGER
THE LAW OFFICES OF HELEN LUGER
P O DRAWER 470
ATHENS, TEXAS 75751

L W NOLIN
P O BOX 464
MALAKOFF, TEXAS 75148

TIMOTHY J ALLISON
10819 CR 2931
PAYNE SPRINGS, TEXAS 75147

DON H DONALDSON
SUPPORT GROUP, INC.
P O BOX 470
ATHENS, TEXAS 75751

JAMES AND DENISE STOTTS
10309 FM 3396
KEMP, TEXAS 75143

HONORABLE CLYDE ALEXANDER
TEXAS HOUSE OF REPRESENTATIVES
P O BOX 2910
AUSTIN, TEXAS 78768-2910

Texas Natural Resource Conservation Commission

Office of Public Assistance

Response to Questions and Comments

Public Meeting 10/08/98 - Dynegy Midstream, Inc. - Permits # 6051 & 6052

The following responses to questions and comments received at the October 8, 1998 TNRCC public meeting concerning the renewal of Dynegy Midstream's Air Quality Permits Numbers 6051 and 6052 were prepared by TNRCC program staff from the New Source Review Permits Division (NSRP), the Toxicology and Risk Assessment Section (TARA), and the Regional Office. Questions or comments which relate to issues that are not within the purview of TNRCC authority are identified as such. As a service to persons interested in this matter, the TNRCC is providing to all persons on the mailing list a copy of the applicant's responses to these same questions. This material is being provided as a service to interested persons and does not imply TNRCC agreement or disagreement with any materials contained therein.

Please note that many of the questions distributed at the public meeting on October 8, 1998 in Payne Springs are not under the jurisdiction of the Texas Natural Resource Conservation Commission (TNRCC) and, as such, are not part of the review of the two pending air permit renewal applications for Dynegy's Eustace gas processing plant. Examples of issues outside of the TNRCC's jurisdiction as it relates to Dynegy's two pending air permit renewal applications include the sour gas pipelines and wells supplying the plant, internal safety issues such as the plant's injury and accident history, and plant insurance policies. The following answers are provided by the TNRCC:

1. **Does chronic exposure to low levels of hydrogen sulfide gas (H_2S) cause or contribute to irreversible central nervous system problems or brain damage?**

   Signs and symptoms of long-term exposure to H_2S have not been clearly established, even though there are significant numbers of workers (approximately 125,000 in the United States) routinely exposed to H_2S well above the TNRCC standard. Even with significant numbers of workers exposed to moderate concentrations of H_2S throughout their work career, there is very little evidence of adverse health effects related to this type of exposure. One case study exists where a 20-month-old child was exposed to greater than 600 parts per billion (ppb) H_2S for nearly one year, which is not considered low-level exposure, and exhibited brain damage and nervous system problems including a lack of coordination and the inability to stand. It is important to note that this child was exposed to H_2S levels much higher than legal limits for a long period of time. The TNRCC does not authorize H_2S exposures of this magnitude. The table below summarizes information on the effects of exposure to H_2S.

Concentration (ppb)	Comment
5 - 20	Odor Recognition Threshold
19	Dynegy Maximum Predicted Residential Property Concentration
67	Dynegy Maximum Predicted Off-Property Concentration
80	TNRCC Residential Property H_2S Standard
120	TNRCC Non-Residential Property H_2S Standard
500	Agencies for Toxic Substances and Disease Registry Acute Health-Based Exposure Level
3,000 - 5,000	Offensive Odor
10,000	Occupational Exposure Limit (eight hour workday)
50,000 or Greater	Eye and Respiratory Tract Irritation Instantaneous.

Note: The 67 ppb maximum predicted concentration (based on modeling) is the single highest one hour ground level concentration that we would expect to occur off-property over one year of facility operations. Please note that the air quality modeling analysis submitted by Dynegy in support of their two pending permit renewal applications is still under review by the agency's NSRP Air Dispersion Modeling Team. The final maximum ground level concentrations predicted to occur as a result of the Dynegy plant's operation may differ from those shown in the table.

2. What level of H_2S exposure is guaranteed not to cause irreversible central nervous system problems or brain damage?

The Toxicology & Risk Assessment Section of the TNRCC would not expect these health effects in individuals exposed to H_2S at the concentrations predicted to occur at residences in the area near the Dynegy facility. While we cannot guarantee that adverse health effects will not occur, we would not expect any adverse health effects at these concentrations below the TNRCC standard.

3. Why doesn't the TNRCC require (in the permit) ambient air monitoring to be performed around this gas treating plant or in the community (i.e., at the closest residences) due to the emissions of H_2S?

The TNRCC does not generally require ambient air monitoring around plants or in communities, due to the various factors that can impact or interfere with accurate air sampling. Property line sampling at a facility is very dependent on current meteorological conditions such as, temperature, wind speed, wind direction, humidity, precipitation, and barometric pressure. Any/all of these factors impact plume behavior, and can affect the results of an ambient sample. (It should be noted that sampling to determine compliance with TNRCC rules regulating ground level concentrations of pollutants [H_2S, SO_2, and/or particulate matter] is dependent on the net difference between an upwind monitor and a downwind monitor that are operated in exactly the same conditions for the exact same time period.)

Data from computer modeling is a good indicator of the likelihood of a facility's impact on downwind ambient air quality. In addition, certified and tested stack monitoring systems deliver reliable data to demonstrate the actual emissions of a facility. Previous ambient sampling down wind of this facility did not detect the presence of H_2S and no H_2S emission increases are proposed by Dynegy in their pending permit renewal applications for the Eustace gas plant.

4. Will the TNRCC provide residents with some type of H_2S monitoring equipment?

The TNRCC will respond to complaints. On several occasions over the history of this plant's operation, the TNRCC (and its predecessor agency) have placed H_2S monitors at homes of complainants for use at their discretion. No indications of H_2S detection were noted by these monitors. It should be noted that these monitors were placed at the requests of complainants, they were used to indicate the presence/absence of H_2S, and they are not reliable to obtain a specific concentration of H_2S. H_2S has a very low odor detection threshold (5 to 20 ppb) as seen in the table in answer to question 1. When an offensive odor is detected (3,000 to 5,000 ppb) instruments and paper tape detectors can record the concentration if the condition exists for more than three minutes. The TNRCC may provide this service again in the future if scheduling and equipment availability allow.

5. Why has the TNRCC not made a more diligent effort and collected samples of corrosion from the residents' property that appears to be related to H_2S exposure?

The TNRCC will respond to complaints. If corrosion of materials off of the plant property is suspected to be caused by plant emissions please ask our Tyler Regional staff to investigate and take samples for laboratory analysis. The investigator can record distances

from the plant and other necessary information.

6. If H_2S can corrode metallic items, what will it do to people who are likewise being exposed? To children?

Substances that can corrode metallic items, like H_2S gas, would cause upper respiratory tract irritation in people, including children, at high enough concentrations. The Toxicology & Risk Assessment Section of the TNRCC would not expect any adverse health effects, including upper respiratory tract irritation, in individuals exposed to H_2S at the concentrations predicted to occur at residences in the area of the Dynegy facility. If these nuisance or irritating conditions occur and a sulfur odor is detected please call the Tyler Region at 903/535-5100 and ask for the complaint coordinator.

7. Is the TNRCC willing to conduct a H_2S corrosion survey in the community to indicate that there may be problems from emissions to H_2S?

The TNRCC will conduct nuisance complaint investigations. See the responses to questions 3, 4, 5, 6, and 32.

8. Will the TNRCC require the permit to have a special provision that insures that the plant operates an alarm system for the community to be warned of a H_2S leak?

It is important to note that the purpose of the permit renewal process is to ensure that existing facilities are operated in compliance with their existing air permits and all applicable state and federal rules and regulations. New permit conditions, such as those requiring a company to operate a community alarm system, are typically added to permits during the renewal process only if necessary to ensure compliance with existing air quality control regulations or to avoid a condition of air pollution. This position is consistent with the intent of the Texas Legislature and the Texas Health and Safety Code's requirements for air permit renewals. At present the Dynegy Eustace facility is not subject to any air quality regulations that would require them to operate a community alarm system.

The Railroad Commission of Texas, Oil and Gas Division, has a Statewide Rule 36 that deals specifically with safety when handling sour gas containing H_2S in concentrations greater 100 parts per million by volume (ppmv). Rule 36 requires an emergency contingency plan which is a written document detailing how the public will be protected and/or evacuated if necessary. It is our understanding that Dynegy has registered the referenced contingency plan with the Railroad Commission of Texas.
The Railroad Commission's Rule 36, officially titled "**Oil, Gas, or Geothermal Resource Operation in Hydrogen Sulfide Areas**" is found in Title 16 of the Texas Administrative

Code, Part I, Chapter 3, Section 3.36. Rule 36 may be found through the Internet on the World Wide Web at the following Universal Resource Locater (URL):

http://lamb.sos.state.tx.us/tac/16/I/3/3.36.html

Questions 9 - 13

The matters raised in these questions are not within the purview of TNRCC authority. Although the TNRCC understands the concerns noted in these questions, the TNRCC does not have regulatory authority over these matters, and cannot provide any determination regarding them.

14. Permits, TNRCC, TRC, EPA, DOT, and others?

The facility holds the following permits with the TNRCC: No. 6051, 6052, & TXR00B798, as well as US EPA Permit No. PSD-TX-55M3. The TNRCC does not require companies to provide information about other permits or authorizations issued by other regulatory entities.

15. Upsets: Frequency records, reasons?

These types of events vary as to cause or reason. Upset reports submitted to the TNRCC are subject to the Texas Open Records Act and are available for review at the TNRCC Region 5 Office in Tyler.

16. OSHA inspections or audits and reports?

The matters raised in this question are not within the purview of TNRCC authority.

17. TNRCC inspections or audits and reports?

All inspection reports are subject to the Texas Open Records Act and are available for review at the TNRCC Region 5 Office in Tyler.

Questions 18 - 24.

The matters raised in this question are not within the purview of TNRCC authority.

25. Voluntary gas release, flares, composition of flare gas, qualification and quantification of composition.

TNRCC records regarding the issues raised in this question are subject to the Texas Open Records Act and are available for review at the TNRCC Region 5 Office in Tyler. The company plans to have an extended gas analysis made of samples of the inlet gas. We know

that the hydrogen sulfide component is about 20% by volume. Our expectation is that flares are at least 98% efficient at reducing hydrocarbons to CO_2 and water and the sulfur in sulfur compounds, including H_2S, to SO_2. Some emissions of CO, nitrous oxides and uncombusted fractions of the material sent to the flare would be expected. Gas processing plants are generally expected to be releasing primarily lighter hydrocarbons in the C_1 to C_5 range. Gases flared at the Dynegy plant are known to contain H_2S. Smoke associated with flares at a gas plant would indicate incomplete combustion and increased carbon particulate and CO emissions.

Question 26.

The matters raised in this question are not within the purview of TNRCC authority.

27. Amount of hazardous materials generated in various categories: Nox, Sox, H2S, Hydrocarbon emissions both gas and liquid, solids?

Amounts of emissions are set out in the renewal application which is subject to the Texas Open Records Act and available for review at the TNRCC Region 5 Office in Tyler. A copy of the plant's Emission Source Table, Table 1(a), is attached to this document to show the gaseous air emission rates originally proposed with the two Dynegy air permit renewal applications currently under review by the TNRCC. Emission Inventory figures submitted to the TNRCC by Dynegy, which reflect the plant's actual air emissions for a given year, are also included for your information.

Question 28.

The matters raised in this question are not within the purview of TNRCC authority.

29. How many upsets has this facility had in the last two years?

The notifications of Upset and Maintenance conditions submitted by the company are a matter of file information at the TNRCC Region 5 Office in Tyler. These files are subject to the Texas Open Records Act, and they are available for review at the TNRCC Region 5 office in Tyler.

30. What were the causes of the plant upsets?

These types of events vary as to cause or reason. Upset reports submitted to the TNRCC are subject to the Texas Open Records Act and are available for review at the TNRCC Region 5 Office in Tyler. See Question No. 15 above.

31. What emissions occurred due to the upsets and how much were permitted rates

exceeded?

Emissions during upset events will vary depending on the nature of the event and the stage of the process or process equipment in which it occurs. Emissions may include smoke (opacity), sulfur dioxide, hydrogen sulfide, and any/all of the hydrocarbon constituents of the incoming plant streams. Upset reports submitted to the TNRCC are subject to the Texas Open Records Act and are available for review at the TNRCC Region 5 Office in Tyler. The TNRCC New Source Review Permits Division typically does not list allowable emission rates in permits for sources that only emit during start-up, shutdown, upset, and/or maintenance activities, as permitted emissions are based on normal facility operations. Start-up, shutdown, upset, and/or maintenance related emissions are covered under the TNRCC General Rules (30 TAC Chapter 101) and have specific notification and record keeping requirements separate from the permit.

Question 32.

This question is directed to the applicant. See TNRCC response to questions three and four above.

33. Is the facility complying with its TNRCC air permits and how is compliance confirmed?

Compliance is determined by making on site investigations at intervals at least as frequently as required by the time frames required in the Texas Clean Air Act and by agreement with the United States Environmental Protection Agency. In actuality, inspections are typically conducted more frequently than at the minimum required time frame. On-site investigations may also be made in response to complaints, permit or monitoring activities, and upset/maintenance notifications. Random inspections are also performed if an investigator is in the immediate vicinity of a plant and determines that there is a reason that merits an on-site inquiry or inspection.

During an inspection various tools may be used to determine compliance with the applicable rules, regulations, and permit requirements. The methods used to determine compliance include visual determinations, documenting conditions to evaluate odor conditions relative to plant emissions, review of plant records, review of continuous emission monitoring system data, review of internal monitoring data, interviewing company officials, and making an effort to contact and interview complainants. Permit applications are also reviewed to compare actual operations with representations made in the permit applications, as these representations become binding conditions after a permit is issued. Federal regulations are reviewed to determine applicability to facilities/processes and compliance is determined based on the status of records review and the present conditions.

Based on the most recent investigation report, the facilities at the Dynegy operation appear to be in compliance with their permit requirements and all applicable state and federal regulations. The company has represented a plan to solve the problem with the flare by additional improvements that should prevent the smoking problem that was brought to Dynegy management's attention at the public meeting.

34. What is the plant doing to comply with TNRCC Regulation II, Rule 112.31 for maximum ground level concentrations of H_2S at 0.08 parts per million for a 30-minute period?

Dynegy will demonstrate compliance with the TNRCC's H_2S standard based upon air quality impact analysis submitted to the TNRCC. Permanent H_2S monitors are situated within the facility property circling the processing and work areas to alarm at 10 ppmv and indicate the location and severity of potential H_2S leaks so that the appropriate corrective actions can be taken to minimize any H_2S emissions to the atmosphere. Please note that the purpose of plant's sulfur recovery unit operating under Permit No. 6052 is to eliminate H_2S by converting it into elemental sulfur. Similarly, the plant's incinerator and flares are used to convert the remaining H_2S into sulfur dioxide to minimize the amount of H_2S emitted.

Questions 35 - 37.

These questions are directed to the applicant.

38. Has the TNRCC conducted any H_2S sampling around the plant?

Monitoring devices specific for indicating H_2S have been placed at the homes of complainants at different times over the history of this plant's operation by TNRCC personnel. No detectable levels of H_2S have been noted.

Question 39.

This question is addressed to the applicant.

40. How are SO2 emissions monitored?

Sulfur dioxide emissions are measured by continuous emission monitoring equipment located in the sulfur recovery plant incinerator stack. This monitoring equipment has been tested to verify relative accuracy as required by TNRCC and US EPA standards. The incinerator stack sulfur dioxide emissions have been determined to be in compliance with US EPA and TNRCC permitted allowables. SO_2 emissions from the Eustace Plant's tailgas incinerator stack are monitored with a continuous emission monitoring system (CEMS) as

required by the conditions of Permit Numbers 6052 and PSD-TX-55M3. In addition, the permits specify quality assurance procedures for the monitoring system and contain recordkeeping requirements in order to document compliance with the applicable permit limits. SO_2 emissions from various other plant combustion devices are minimized by burning only pipeline-quality sweet natural gas as fuel as specified in the permits.

41. Does the plant have any CEMS (continuous Emissions Monitoring Systems)?

See No. 40 above. In addition, the company also has numerous H_2S ambient monitors (Also referenced in Question No. 34.) Located inside the plant proper.

Questions 42- 47.

The matters raised in these questions are not within the purview of TNRCC authority.

48. Does anything that the plant processes, produces, or emits contain benzine?

Minor fractions of benzene are expected in natural gas streams such as those processed at the Eustace gas plant. Typically the amount of benzene contained in natural gas, on a percentage basis, is much less than the amount of benzene contained in common motor gasolines. Natural gas liquids produced at the plant similarly contain small amounts of benzene. Small emissions of natural gas hydrocarbons are experienced from fugitive emission sources (leaks) and plant combustion devices. Routine maintenance expected of gas processing plant operators keep these leaks to a minimum.

Respectively submitted,

Jodena N. Henneke
Director, Office of Public Assistance
TNRCC MC 108
P.O. Box 13087
Austin, Texas 78711-3087
Phone: (512) 239-4000
Fax: (512) 239-4007

CERTIFICATE OF SERVICE

I hereby certify that on Feb 22, 1999, the original and eleven (11) true and correct copies of Office of Public Assistance's response to questions and comments voiced at a public meeting held on the above-referenced matter on October 8, 1998 were filed with the Chief Clerk of the TNRCC, and a copy served on all persons listed on the attached mailing list via hand delivery, facsimile, inter-agency mail, or by deposit in the U.S. Mail.

Jodena N. Henneke

PERMIT NO. 6051 & 6052 PERMIT TYPE: CONSTRUCTION [ ] AMENDMENT [ ] REVISION [ ] RENEWAL [x]
ACCOUNT ID NO. HM-0014-N

TABLE 1(a)
EMISSION SOURCES

DATE 2/24/98

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA						EMISSION POINT DISCHARGE PARAMETERS										
EMISSION POINT [1]		CHEMICAL COMPOSITION OF TOTAL STREAM		AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [6]			SOURCE HEIGHT ABOVE GROUND [ft.]	SOURCE HEIGHT ABOVE STRUCT. [ft.]	STACK SOURCES (7) EXIT DATA			FUGITIVE SOURCES [8]	
NUMBER	NAME	COMPONENT OR AIR CONTAMINANT NAME [2]	CONC. (%v) [3]	#/HR [4]	.....TONS/ YR. [5]	ZONE	EAST [meters]	NORTH [meters]			DIA. [ft.]	VEL. [fps]	TEMP. [°F]	LENGTH [ft.]	WIDTH [ft.]
CTATNK	Cooling tower acid storage tank	Sulfuric acid (H2SO4)		0	0	14	778780	3574020	8	8	0.08	0.01	70		
DEMINI	Demineralizer acid storage tank	Sulfuric acid (H2SO4)		0	0	14	778890	3573807	12	12	0.08	0.01	70		
INHOILTNK	Inhibitor storage tank	VOC		0.000035	0.00079	14	778715	3574020	10	10	0.08	0.01	70		
SLPTNK	Slop tank	VOC		0.08	0.19	14	778990	3574058	12.4	12.4	0.08	0.01	70		
V-109	Methanol storage tank	VOC		0.18	0.04	14	778690	3573990	12.5	12.5	0.08	0.01	70		
TRTDFUG	Treated Gas fugitives	VOC		0.16	0.70	14	778890	3573950						20	20

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL_____feet.
TNRCC STANDARD CONDITIONS ARE 68°F AND 14.7 PSIA [RULE 131.01.00.001(55)]
See instructions on reverse side.

PERMIT NO. 6051 & 6052 PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. HM-0014-N

TABLE 1(a)
EMISSION SOURCES

DATE November 1997

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS											
EMISSION POINT [1]		COMPONENT OR AIR CONTAMINANT NAME (2)	AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [5]			SOURCE								
								HEIGHT ABOVE GROUND	HEIGHT ABOVE STRUCT.	STACK EXIT DATA			FUGITIVES			
NUMBER	NAME		#/HR [3]	TONS/YR [4]	ZONE	EAST [meters]	NORTH [meters]	[ft.]	[ft.] [6(A)]	DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]
EPN AUXWHRU501	Auxiliary burner	Nitrogen Oxides (NOx)	4.61	20.19	14	778939	3573833	20		3.33	142	500				
FIN TURBOX501																
EPN		Carbon Monoxide (CO)	18.96	83.04												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.019	0.085												
FIN																
EPN		Volatile Organic Compounds (VOC)	0.18	0.78												
FIN																
EPN		Particulate Matter (PM_{10})	0.16	0.71												
FIN																
EPN WHRU502	Auxiliary burner	Nitrogen Oxides (NOx)	4.61	20.19	14	778937	3573828	20		3.33	142	500				
FIN AUXWHRU502																
EPN		Carbon Monoxide (CO)	18.96	83.04												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.019	0.085												
FIN																
EPN		Volatile Organic Compounds (VOC)	0.18	0.78				20		3.33	142	500				
FIN																
EPN		Particulate Matter (PM_{10})	0.16	0.71												
FIN																
EPN WHRU503	Auxiliary burner	Nitrogen Oxides (NOx)	4.61	20.19	14	778935	3573823	20		3.33	142	500				
FIN AUXWHRU503																
EPN		Carbon Monoxide (CO)	18.96	83.04												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.019	0.085												
FIN																
EPN		Volatile Organic Compounds (VOC)	0.18	0.78												
FIN																
EPN		Particulate Matter (PM_{10})	0.16	0.71												
FIN																

RECEIVED
JAN 13 1998
PERMITS PROGRAM

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL 383 feet.
TNRCC STANDARD CONDITIONS ARE 68 F AND 14.7 PSIA [GENERAL RULE 101.1].

PERMIT NO. 6051 & 6052 PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. HM-0014-N

DATE November 1997

TABLE 1(a)
EMISSION SOURCES

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS											
EMISSION POINT [1]		COMPONENT OR AIR CONTAMINANT NAME (2)	AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [5]			SOURCE								
								HEIGHT ABOVE GROUND	HEIGHT ABOVE STRUCT.	STACK EXIT DATA			FUGITIVES			
NUMBER	NAME		#/HR [3]	TONS/YR [4]	ZONE	EAST [meters]	NORTH [meters]	[ft.]	[ft.] [6(A)]	DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]
EPN BOZURN	Zurn boiler stack	Nitrogen Oxides (NOx)	7.6	33.29	14	778925	3573848	40		3.67	3.9	386				
FIN BO1201ZURN																
EPN		Carbon Monoxide (CO)	8.4	36.79												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.06	0.26												
FIN																
EPN		Volatile Organic Compounds (VOC)	0.55	2.41												
FIN																
EPN		Particulate Matter (PM_{10})	0.50	2.19												
FIN																
EPN CMK201A	Engine stack (w/cat.)	Nitrogen Oxides (NOx)	5.79	25.35	14	778835	3574024	16		1	84.5	1010				
FIN CMK201-A	Waukesha L7042GSI															
EPN		Carbon Monoxide (CO)	3.86	16.90												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.46	2.00												
FIN																
EPN		Volatile Organic Compounds (VOC)	2.70	11.84												
FIN																
EPN		Particulate Matter (PM_{10})	0	0												
FIN																
EPN CMK201B	Engine stack (w/cat.)	Nitrogen Oxides (NOx)	5.79	25.35	14	778833	3574016	16		1	84.5	1010				
FIN CMK201-B	Waukesha L7042GSI															
EPN		Carbon Monoxide (CO)	3.86	16.90												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.46	2.00												
FIN																
EPN		Volatile Organic Compounds (VOC)	2.70	11.84												
FIN																
EPN		Particulate Matter (PM_{10})	0	0												
FIN																

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL 383 feet.
TNRCC STANDARD CONDITIONS ARE 68 F AND 14.7 PSIA [GENERAL RULE 101.1].

PERMIT NO. 6051 & 6052 PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. HM-0014-N

DATE November 1997

TABLE 1(a)
EMISSION SOURCES

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS											
EMISSION POINT [1]			COMPONENT OR AIR CONTAMINANT NAME (2)	AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [5]			SOURCE							
									HEIGHT ABOVE GROUND [ft.]	HEIGHT ABOVE STRUCT. [ft.] [6(A)]	STACK EXIT DATA			FUGITIVES			
NUMBER	NAME			#/HR [3]	TONS/YR [4]	ZONE	EAST [meters]	NORTH [meters]			DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]
EPN CMK201C	Engine stack (w/cat.)		Nitrogen Oxides (NOx)	5.79	25.35	14	778831	3574012	16		1	84.5	1010				
FIN CMK201-C	Waukesha L7042GSI																
EPN			Carbon Monoxide (CO)	3.86	16.90												
FIN																	
EPN			Sulfur Dioxide (SO_2)	0.46	2.00												
FIN																	
EPN			Volatile Organic Compounds (VOC)	2.70	11.84												
FIN																	
EPN			Particulate Matter (PM_{10})	0	0												
FIN																	
EPN CMK201D	Engine stack (w/cat.)		Nitrogen Oxides (NOx)	5.79	25.35	14	778830	3574009	16		1	84.5	1010				
FIN CMK201-D	Waukesha L7042GSI																
EPN			Carbon Monoxide (CO)	3.86	16.90												
FIN																	
EPN			Sulfur Dioxide (SO_2)	0.46	2.00												
FIN																	
EPN			Volatile Organic Compounds	2.70	11.84												
FIN																	
EPN			Particulate Matter (PM_{10})	0	0												
FIN																	
EPN CMK201E	Engine stack (w/cat.)		Nitrogen Oxides (NOx)	5.79	25.35	14	778828	3574003	16		1	84.5	1010				
FIN CMK201-E	Waukesha L7042GSI																
EPN			Carbon Monoxide (CO)	3.86	16.90												
FIN																	
EPN			Sulfur Dioxide (SO_2)	0.46	2.00												
FIN																	
EPN			Volatile Organic Compounds (VOC)	2.70	11.84												
FIN																	
EPN			Particulate Matter (PM_{10})	0	0												
FIN																	

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL 383 feet.
TNRCC STANDARD CONDITIONS ARE 68 F AND 14.7 PSIA [GENERAL RULE 101.1].

PERMIT NO. 6051 & 6052 PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. HM-0014-N

DATE November 1997

TABLE 1(a)
EMISSION SOURCES

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS											
EMISSION POINT [1]			COMPONENT OR AIR CONTAMINANT NAME (2)	AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [5]			SOURCE							
									HEIGHT ABOVE GROUND [ft.]	HEIGHT ABOVE STRUCT. [ft.] [6(A)]	STACK EXIT DATA			FUGITIVES			
NUMBER		NAME		#/HR [3]	TONS/YR [4]	ZONE	EAST [meters]	NORTH [meters]			DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]
EPN	H-102	Tank bottom heater	Nitrogen Oxides (NOx)	0.41	1.79	14	778900	3574035	74	74	2.0	13.2	450	465	281	8	E
FIN	H-102																
EPN			Carbon Monoxide (CO)	0.13	0.57												
FIN																	
EPN			Sulfur Dioxide (SO_2)	0.38	1.66												
FIN																	
EPN			Volatile Organic Compounds (VOC)	0.06	0.26												
FIN																	
EPN			Particulate Matter (PM_{10})	0.03	0.12												
FIN																	
EPN	~~FLCPLT~~	Cold plant flare	Nitrogen Oxides (NOx)	0.00014	0.0006	14	778815	3574190	175		1.17	76.2	1800				
FIN	FL-CPLT																
EPN			Carbon Monoxide (CO)	0.0012	0.0051												
FIN																	
EPN			Sulfur Dioxide (SO_2)	0.0013	0.0056												
FIN																	
EPN			Volatile Organic Compounds (VOC)	0.0012	0.0052												
FIN																	
EPN			Particulate Matter (PM_{10})	0	0												
FIN																	
EPN	FL-FLD	Well flowline flare (field flare)	Nitrogen Oxides (NOx)	0.00041	0.0018	14	778815	3574190	175		1.33	76.2	1800				
FIN	FL-FIELD																
EPN			Carbon Monoxide (CO)	0.0035	0.015												
FIN																	
EPN			Sulfur Dioxide (SO_2)	0.0039	0.017												
FIN																	
EPN			Volatile Organic Compounds (VOC)	0.035	0.155												
FIN																	
EPN			Particulate Matter (PM_{10})	0	0												
FIN																	

FLCLD

RECEIVED
JAN 13 1998
PERMITS PROGRAM

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL 383 feet.
TNRCC STANDARD CONDITIONS ARE 68 F AND 14.7 PSIA [GENERAL RULE 101.1].

PERMIT NO. 6051 & 6052 PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. HM-0014-N

TABLE 1(a)
EMISSION SOURCES

DATE November 1997

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS											
EMISSION POINT [1]			COMPONENT OR AIR CONTAMINANT NAME (2)	AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [5]			SOURCE							
									HEIGHT ABOVE GROUND [ft.]	HEIGHT ABOVE STRUCT. [ft.] [6(A)]	STACK EXIT DATA			FUGITIVES			
NUMBER	NAME			#/HR [3]	TONS/YR [4]	ZONE	EAST [meters]	NORTH [meters]			DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]
EPN FL-PROC	Plant process flare	Nitrogen Oxides (NOx)		0.00041	0.0018	14	778815	3574190	175		2.0	76.2	1800				
FIN FL-PCTPRO																	
EPN		Carbon Monoxide (CO)		0.0035	0.015												
FIN																	
EPN		Sulfur Dioxide (SO_2)		0.0039	0.017												
FIN																	
EPN		Volatile Organic Compounds (VOC)		0.035	0.155												
FIN																	
EPN		Particulate Matter (PM_{10})		0	0												
FIN																	
EPN EMPFWPUMP	Firewater pump	Nitrogen Oxides (NOx)		0.009	0.04	14	778775	3574010	12		0.5	68.9	900				
FIN FWPUMP																	
EPN		Carbon Monoxide (CO)		0.002	0.009												
FIN																	
EPN		Sulfur Dioxide (SO_2)		0.0006	0.003												
FIN																	
EPN		Volatile Organic Compounds (VOC)		0.001	0.004												
FIN																	
EPN		Particulate Matter (PM_{10})		0.0006	0.003												
FIN																	
EPN INSTK	Tailgas Incinerator "A"	Nitrogen Oxides (NOx)		4.23	18.55	14	778765	3573955	300		7.5	19.8	850				
FIN INCINA																	
EPN		Carbon Monoxide (CO)		1.82	7.97												
FIN																	
EPN		Sulfur Dioxide (SO_2)		175	546												
FIN																	
EPN		Volatile Organic Compounds (VOC)		0.0005	0.002												
FIN																	
EPN		Particulate Matter (PM_{10})		0.0003	0.0015												
FIN																	

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL 383 feet.
TNRCC STANDARD CONDITIONS ARE 68 F AND 14.7 PSIA [GENERAL RULE 101.1].

PERMIT NO. 6051 & 6052 PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. HM-0014-N

TABLE 1(a)
EMISSION SOURCES

DATE November 1997

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS											
EMISSION POINT [1]		COMPONENT OR AIR CONTAMINANT NAME (2)	AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [5]			SOURCE								
								HEIGHT ABOVE GROUND	HEIGHT ABOVE STRUCT.	STACK EXIT DATA			FUGITIVES			
NUMBER	NAME		#/HR [3]	TONS/YR [4]	ZONE	EAST [meters]	NORTH [meters]	[ft.]	[ft.] [6(A)]	DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]
EPN INSTK	Tailgas incinerator "B"	Nitrogen Oxides (NOx)	4.23	18.55	14	778765	3573955	300		7.5	19.8	850				
FIN INCINB																
EPN		Carbon Monoxide (CO)	1.82	7.97												
FIN																
EPN		Sulfur Dioxide (SO_2)	175	546												
FIN																
EPN		Volatile Organic Compounds (VOC)	0.0005	0.002												
FIN																
EPN		Particulate Matter (PM_{10})	0.0003	0.0015												
FIN																
EPN TRTDFUG	Treated gas fugitives	Volatile Organic Compounds (VOC)	0.16	0.70												
FIN TRTDFUG																
EPN EPNNGLFUG	Cold plant fugitives	Volatile Organic Compounds (VOC)	0.11	0.48	14	778900	3573900						350	250	8	E
FIN NGLFUG																
EPN RESFUG	Fugitive emissions	Volatile Organic Compounds (VOC)	0.084	0.37	14	778780	3573900						100	100	8	E
FIN RES FUG																
EPN EPNS2PIT	Sulfur storage pit vent	Sulfur Dioxide (SO_2)	0.03	0.13	14	778790	3573840	30		1.0	12.25	320				
FIN S2 PIT																
EPN		Hydrogen Sulfide (H_2S)	0.86	3.77												
FIN																
EPN REGNHR	Mol sieve regenerator	Nitrogen Oxides (NOx)	0.61	2.68	14	778905	3574045	60		2.83	20.5	450	350	250	8	
FIN REGENHR601	gas heater															
EPN		Carbon Monoxide (CO)	0.68	2.97												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.004	0.02												
FIN																
EPN		Volatile Organic Compounds (VOC)	0.04	0.19												
FIN																
EPN		Particulate Matter (PM_{10})	0.04	0.18												
FIN																

RECEIVED
JAN 1 8 1998
PERMITS PROGRAM

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL 383 feet.
TNRCC STANDARD CONDITIONS ARE 68 F AND 14.7 PSIA [GENERAL RULE 101.1].

PERMIT NO. 6051 & 6052 PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. HM-0014-N

DATE November 1997

TABLE 1(a)
EMISSION SOURCES

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS											
EMISSION POINT [1]		COMPONENT OR AIR CONTAMINANT NAME (2)	AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [5]			SOURCE								
								HEIGHT ABOVE GROUND [ft.]	HEIGHT ABOVE STRUCT. [ft.] [6(A)]	STACK EXIT DATA			FUGITIVES			
NUMBER	NAME		#/HR [3]	TONS/YR [4]	ZONE	EAST [meters]	NORTH [meters]			DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]
EPN H-102	Tank bottom heater	Nitrogen Oxides (NOx)	0.41	1.79	14	778900	3574035	74	74	2.0	13.2	450				
FIN H-102																
EPN		Carbon Monoxide (CO)	0.13	0.57												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.38	1.66												
FIN																
EPN		Volatile Organic Compounds (VOC)	0.06	0.26												
FIN																
EPN		Particulate Matter (PM_{10})	0.03	0.12												
FIN																
EPN STABHR	Condensate stabilizer heater stack	Nitrogen Oxides (NOx)	1.23	5.37	14	778935	3574045	60		2.83	20.5	450				
FIN STABHR101																
EPN		Carbon Monoxide (CO)	1.35	5.93												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.01	0.04												
FIN																
EPN		Volatile Organic Compounds (VOC)	0.09	0.39												
FIN																
EPN		Particulate Matter (PM_{10})	0.08	0.35												
FIN																
EPN INSTK	Tailgas incinerator stack	Nitrogen Oxides (NOx)	8.46	37.1	14	778765	3573955	300		7.5	19.8	850				
FIN SULPROC																
EPN	*(NOTE: This is the combined*	Carbon Monoxide (CO)	3.69	15.9												
FIN	*emissions from 2 incinerators*															
EPN	*already listed as INCINA*	Sulfur Dioxide (SO_2)	350	1,092												
FIN	*and INCINB, and n*															
EPN	*an additional source.)*	Volatile Organic Compounds (VOC)	0.001	0.004												
FIN																
EPN		Particulate Matter (PM_{10})	0.0006	0.003												
FIN																

RECEIVED JAN 13 1998 PERMITTING PROGRAM

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL 383 feet.
TNRCC STANDARD CONDITIONS ARE 68 F AND 14.7 PSIA [GENERAL RULE 101.1].

PERMIT NO. 6051 & 6052 PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. HM-0014-N

DATE November 1997

TABLE 1(a)
EMISSION SOURCES

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS											
EMISSION POINT [1]		COMPONENT OR AIR CONTAMINANT NAME (2)	AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [5]			SOURCE								
								HEIGHT ABOVE GROUND [ft.]	HEIGHT ABOVE STRUCT. [ft.] [6(A)]	STACK EXIT DATA			FUGITIVES			
NUMBER	NAME		#/HR [3]	TONS/YR [4]	ZONE	EAST [meters]	NORTH [meters]			DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]
EPN TURBOX501	Turbine exhaust	Nitrogen Oxides (NOx)	10.50	45.99	14	778939	3573833	20		3.33	142	500				
FIN TURB501																
EPN		Carbon Monoxide (CO)	21.25	93.08												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.67	2.95												
FIN																
EPN		Volatile Organic Compounds (VOC)	0.11	0.48												
FIN																
EPN		Particulate Matter (PM_{10})	0	0												
FIN																
EPN TURBOX502	Turbine exhaust	Nitrogen Oxides (NOx)	10.50	45.99	14	778937	3573828	20		3.33	142	500				
FIN TURB502																
EPN		Carbon Monoxide (CO)	21.25	93.08												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.67	2.95												
FIN																
EPN		Volatile Organic Compounds (VOC)	0.11	0.48												
FIN																
EPN		Particulate Matter (PM_{10})	0	0												
FIN																
EPN TURBOX503	Turbine exhaust	Nitrogen Oxides (NOx)	10.50	45.99	14	778935	3573823	20		3.33	142	500				
FIN TURB503																
EPN		Carbon Monoxide (CO)	21.25	93.08												
FIN																
EPN		Sulfur Dioxide (SO_2)	0.67	2.95												
FIN																
EPN		Volatile Organic Compounds (VOC)	0.11	0.48												
FIN																
EPN		Particulate Matter (PM_{10})	0	0												
FIN																

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL 383 feet.
TNRCC STANDARD CONDITIONS ARE 68 F AND 14.7 PSIA [GENERAL RULE 101.1].

PERMIT NO. 6051 & 6052 PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. HM-0014-N

DATE November 1997

TABLE 1(a)
EMISSION SOURCES

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS											
EMISSION POINT [1]			COMPONENT OR AIR CONTAMINANT NAME (2)	AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [5]			SOURCE							
									HEIGHT ABOVE GROUND [ft.]	HEIGHT ABOVE STRUCT. [ft.] [6(A)]	STACK EXIT DATA			FUGITIVES			
NUMBER		NAME		#/HR [3]	TONS/YR [4]	ZONE	EAST [meters]	NORTH [meters]			DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]
EPN	EPNWH20PIT	Wastewater pit	Volatile Organic Compounds (VOC)	5.77	25.29	14	779015	3574100						147	97	60	W
FIN	WH20PIT																
EPN	EPNS2TANK	Sulfur storage tank	Sulfur Dioxide (SO_2)	0.0013	0.0038	14	778758	3573825	45		1	5.0	380				
FIN	S2 TANK																
EPN			Hydrogen Sulfide (H_2S)	0.053	0.23												
FIN																	
EPN	COND1	Condensate storage tank V-105A	Volatile Organic Compounds (VOC)	0	0	14	778665	3574010									
FIN	COND1																
EPN	V-517A	Condensate storage tank V-517A	Volatile Organic Compounds (VOC)	0	0	14	778700	3574033									
FIN	V-517A																
EPN	V-517B	Condensate storage tank V-517B	Volatile Organic Compounds (VOC)	0	0	14	778666	3574035									
FIN	V-517B																
EPN	V-518	Condensate(blended) storage tank	Volatile Organic Compounds (VOC)	0	0	14	778690	3574008									
FIN	V-518																
EPN	V-217	Sulfolane storage tank	Volatile Organic Compounds (VOC)	0	0	14	778956	3573878									
FIN	V-217																
EPN	V-218	DIPA storage tank	Volatile Organic Compounds (VOC)	0	0	14	778962	3573876									
FIN	V-218																
EPN	V-109	Methanol storage tank	Volatile Organic Compounds (VOC)	0.18	0.04	14	778690	3573990									
FIN	V-109																
EPN	CTATNK	Cooling tower acid storage tank	Sulfuric Acid (H_2SO_4)	0.000016	0.000018	14	778780	3574020									
FIN	CTATNK																
EPN	CORRITNK	Corrosion inhibitor tank	xxxx	0	0	14	778770	3574033									
FIN	CORRITNK																
EPN	EPN INLET	Inlet fugitive emissions	Volatile Organic Compounds (VOC)	0.31	1.36	14	779150	3573930						500	330	8	E
FIN	INLET FUG																
EPN			Hydrogen Sulfide (H_2S)	0.93	4.07												
FIN																	
EPN																	
FIN																	

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL 383 feet.
TNRCC STANDARD CONDITIONS ARE 68 F AND 14.7 PSIA [GENERAL RULE 101.1].

PERMIT NO. 6051 & 6052 PERMIT TYPE: CONSTRUCTION ☐ AMENDMENT ☐ ALTERATION ☐ RENEWAL ☒

ACCOUNT ID NO. HM-0014-N

DATE November 1997

TABLE 1(a)
EMISSION SOURCES

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					EMISSION POINT DISCHARGE PARAMETERS										
EMISSION POINT [1]			AIR CONTAMINANT EMISSION RATE		UTM COORDINATES OF EMISSION PT. [5]			SOURCE							
								HEIGHT ABOVE GROUND	HEIGHT ABOVE STRUCT.	STACK EXIT DATA			FUGITIVES		
NUMBER	NAME	COMPONENT OR AIR CONTAMINANT NAME (2)	#/HR [3]	TONS/YR [4]	ZONE	EAST [meters]	NORTH [meters]	[ft.]	[ft.] [6(A)]	DIA. [ft.] [6(B)]	VEL. [fps] [6(C)]	TEMP. [F] [6(D)]	LENGTH [ft.] [7(A)]	WIDTH [ft.] [7(B)]	AXIS DEG. [7(C)]	E/W OF NORTH [7(D)]
EPN SLPTNK	Slop tank	Volatile Organic Compounds (VOC)	0.08	0.19	14	778990	3574058									
FIN SLPTNK																
EPN INHOILTNK	Inhibitor storage tank	Volatile Organic Compounds (VOC)	0.000035	0.00079	14	778715	3574020									
FIN INHOILTNK																
EPN DEMIN1	Demineralizer acid storage tank	Sulfuric Acid (H_2SO_4)	0.000016	0.000018	14	778890	3573807									
FIN DEMIN1																
EPN V-216	Sulfinol storage tank	Volatile Organic Compounds (VOC)	0	0	14	778752	3573880									
FIN V-216																
EPN CLOAD	Condensate truck loading rack	Volatile Organic Compounds (VOC)	0	0	14	778630	3574015						120	25	8	E
FIN CLOAD																
EPN SLOAD	Sulfur railcar loading area	Particulate Matter (PM10)	0	0	14	778575	3573865						60	25	8	E
FIN SLOAD																
EPN		Hydrogen Sulfide (H_2S)	0	0												
FIN																
EPN SLUG-FUG	Slug catcher fugitives	Volatile Organic Compounds (VOC)	0	0	14	779145	3573915						50	25	8	E
FIN SLUG-FUG																
EPN CUDFUG	Condensate fugitives	Volatile Organic Compounds (VOC)	0.11	0.48	14	778900	3574000						465	281	8	E
FIN CUDFUG																
EPN EPNS2FUG	Sulfur plant fugitives	Hydrogen Sulfide (H_2S)	0.014	0.06	14	778900	3573800						500	250	8	E
FIN S2PLTFUG																
EPN		Sulfur Dioxide (SO_2)	0.0032	0.01												
FIN																
EPN																
FIN																
EPN																
FIN.																
EPN																
FIN																
EPN																
FIN																

RECEIVED
JAN 13 1998
PERMITS PROGRAM

EPN = EMISSION POINT NUMBER
FIN = FACILITY IDENTIFICATION NUMBER

GROUND ELEVATION OF FACILITY ABOVE MEAN SEA LEVEL 383 feet.
TNRCC STANDARD CONDITIONS ARE 68 F AND 14.7 PSIA [GENERAL RULE 101.1].

Current Emissions Totals within TNRCC Point Source Data Base (PSDB) for Dynegy Midstream
TNRCC Account HM0014N

Wednesday, February 10, 1999

ACCOUNT	CONTAMINANT CODE	CONTAMINANT Name	Sum of ACTUAL (TPY)
HM0014N	10000	PART-U	3.8826
HM0014N	20000	PM10 PART-U	3.8826
HM0014N	50001	NONMETHANE VOC-U	45.0646
HM0014N	52420	BENZENE	0.0000
HM0014N	52450	ETHYL BENZENE	0.0000
HM0014N	52490	TOLUENE	0.0000
HM0014N	52510	XYLENE-U	0.0000
HM0014N	56550	ETHANE	0.0000
HM0014N	56575	HEPTANE	0.0000
HM0014N	56600	HEXANE	0.0000
HM0014N	56625	ISOBUTANE	0.0000
HM0014N	56674	OCTANE	0.0000
HM0014N	56700	ISO PENTANE	0.0000
HM0014N	56703	NONANE	0.0000
HM0014N	56725	N BUTANE	0.0000
HM0014N	56750	PENTANE	0.0000
HM0014N	56775	PROPANE	0.0000
HM0014N	59090	CONDENSATE	15.5357
HM0014N	60000	METHANE	0.0000
HM0014N	70050	AMMONIA	0.0000
HM0014N	70300	HYDROGEN SULFIDE	0.0120
HM0014N	70400	NITROGEN OXIDES	240.7920
HM0014N	70510	SULFUR DIOXIDE	128.1277
HM0014N	90300	CARBON MONOXIDE	215.9139

Produced by TNRCC Industrial Emissions Assessment Section

October 26, 1998

Ms. Kim Temple
6980 Terry Trace
Eustace, Texas 75124

Dear Ms. Temple:

Attached please find responses from Dynegy Midstream Inc. to the questions you submitted during our public meeting earlier in the month. Dynegy appreciates your interests and concerns regarding our operation at the Eustace Plant and is pleased to provide you with the following information.

The enclosed responses address the questions best answered by Dynegy. The remainder of the questions will be answered by the TNRCC, as they relate directly to their areas of jurisdiction or expertise.

Dynegy takes its role as corporate citizen very seriously and welcomes this and future opportunities to talk with you about our plant. We are committed to Eustace, Texas and are dedicated to finding ways to strengthen our relationship with its citizens.

As always, please feel free to contact Dynegy with any future concerns.

Sincerely,

Len Hesseltine

21. ***Evacuations of plant and /or residents?***
Neither Dynegy nor any of its predecessors have ever had to evacuate the plant or any residents.

22. ***Drills of plant and/or residents?***
The plant conducts an annual drill with its employees. Past drills have also included members of local public safety fraternity. No drills have been conducted with the residents.

23. ***Injuries and/or deaths reported?***
There have been no deaths or hydrogen sulfide related injuries at the plant. To date, in 1998, only one employee injury has occurred. It was not a lost-time accident, (a sulfur speck in the eye). There were no injuries in either 1997 or 1996. In 1995 there were 3 employee injuries including a cut finger, injured left foot & lower back, and a knee injury. There were no employee injuries in 1994, 1993, 1992, 1991 or 1990. In addition, two contractors have been injured, one in 1998 from a sulfur spill while loading a railcar, the other in 1997 when a locker pinched his hand.

24. ***History of accidents?***
In addition to the injuries noted above, we are uncertain as to what additional information is being requested here. Please feel free to contact us with a more specific request.

25. ***Voluntary gas release, flares, composition of flare gas, qualification and quantification of composition?***
Dynegy makes every effort to minimize use of the flare. When flaring does occur, gas is being diverted to the flare from one of several possible process streams. Compositions for the various gas streams prior to combustion in the flare are attached. These do not reflect the composition of the emissions after combustion by the flare.

26. ***Hazardous material generator permits and reports?***
The facility is not a hazardous waste generator. A complete listing of hazardous materials used on site is on file with the Henderson County LEPC in Athens.

27. ***Amount of hazardous materials generated in various categories: Nox, Sox, H2S, Hydrocarbon emissions both gas and liquid, solids?***
NOx, SOx and hydrocarbons are referred to as criteria pollutants. H2S is referred to as a non-criteria pollutant. The amounts of the above referenced pollutants that are generated and released into the atmosphere are provided in our renewal application.

28. ***Fires and/or explosions history?***

In 1998 there have been two fires at the plant. The first occurred when a propane compressor cylinder had a packing leak and was ignited by a welder. The welder's fire watch (a designated employee) immediately extinguished the fire. The second resulted when a leak on a condensate separator site glass developed a small leak and was subsequently ignited by the heat tracing. The fire was very small and was extinguished immediately with no equipment damage.

29. ***How many upsets has this facility had in the last two years?***

The answer to this question is the same as to question number 15.

30. ***What were the causes of the plant upsets?***

As described in question fifteen, upsets occur when an unplanned event requires gas that is normally processed to be diverted to the flare and combusted. Some examples of such unplanned events include compressor shutdowns, in which case the inlet gas would be diverted to the flare until the compressor is brought back on line. In addition, we do have maintenance activities that would require gas to be diverted to the flare. For example, the June 1997 flare shown at the public meeting was the result of a planned pipeline re-routing required by construction of Loop 317 around the city of Athens. It is important to note that this flaring was not a violation of our permit, and emissions did not exceed federal ambient air quality standards.

31. ***What emissions occurred due to the upsets and how much were permitted rates exceeded?***

The emissions that occur during upsets are authorized by TNRCC regulations. There are no permitted levels associated with this activity, however the company utilizes every effort to minimize these emissions. In general, it should be noted that these flares cost Dynegy money as gas and products are being burned. The maximum emissions that occurred in the past two years due to these upsets are as follows:

Residue gas flaring: NOx - 60 lbs; CO - 120 lbs.

Inlet gas flaring: SO2 - 292 tons; NOx - 0.75 tons;
CO - 1.53 tons; VOC - 2.33 tons

Condensate Stabilizer flaring: SO2 - 3.75 tons; NOx - 0.01 tons; CO - 0.02 tons

Based on air quality impact analysis the amounts of SO2, NOx and CO pollutants that was released due to these upsets result in ambient concentrations that are below the federal and state ambient air quality standards (health standards).

32. ***Has the facility conducted any H2S sampling/monitoring beyond its property line and what were the measurements obtained?***
The facility has approximately 60 permanent H2S monitors to continuously monitor the gathering system. The plant has responded to these monitors which are set to alarm at 10 parts per million. In all cases, the alarms were the result of maintenance and producer activities, and there were no leaks from the pipeline. The plant also uses portable monitors to respond to inquiries and complaints outside the plant's property line. The plant has responded to 15 such requests this year. On eleven of those occasions the meter reading was zero. On one occasion a meter read .4 PPM. The remaining 3 times the meter read .1 ppm.

33. ***Is the facility complying with its TNRCC air permit and how is compliance confirmed?***
Yes, the Dynegy facility is in compliance with its TNRCC air permit. This is confirmed through both scheduled and unannounced audits by the TNRCC at the plant. We also have a continuous sulfur dioxide monitor on the stack at the plant.

34. ***What is the plant doing to comply with TNRCC Regulation II, Rule 112.31 for maximum ground level concentrations of H2S at 0.08 parts per million for a 30-minute period?***
Dynegy is in compliance with the TNRCC standard based upon Dynegy's dispersion modeling reports submitted to TNRCC.

35. ***Has the company received any citizen complaints about sour gas odors?***
The plant has received odor complaints and responded as indicated in question 32.

36. ***Has the facility taken corrective steps to remedy sour gas odor levels?***
Yes, a sour water separator was installed in 1992 . This minimizes the sour water that goes to the wastewater pit and reduces odors. An eductor was also installed in 1993 to take vapors from the sulfur tank and sulfur pit to the incinerator also reducing odors.

37. ***What information is available to demonstrate a reduction in sour gas odor levels?***
We are currently reviewing data to see if any trends demonstrate such a reduction.

38. ***Has the TNRCC conducted any H2S sampling around the plant?***
The TNRCC will address this question.

39. ***Does the plant consider H2S or SO2 to be its most serious ambient air pollution concern?***
We take all emissions seriously. It is important to note that ambient air quality health standards are not exceeded by H2S and SO2 emissions from our facility.

40. ***How are SO2 emissions monitored?***
There is an analyzer on the incinerator stack that continuously monitors emissions.

41. ***Does the plant have any CEMS (continuous Emissions Monitoring Systems)?***
Yes. The SO2 analyzer on the incinerator stack.

42. ***Does the company conduct an environmental audit of the facility each year?***
Yes. The facility meets or exceeds all state and federal environmental standards in its operation. The last company led audit of the facility occurred in April 1998. The Eustace plant also has an excellent record on both routine and surprise audits of its environmental compliance by state and federal regulatory agencies.

43. ***What has the company done in the last two years to make the plant safer and able to continuously comply with state and federal (?) Air permits requirements?***
Dynegy believes that protecting people's health and safety takes priority over production. Dynegy consistently reinforces its commitment to safety through extensive employee training and implementation of Process Safety Management.

44. ***Pipeline failures or problems?***
There have been no pipeline failures in the Eustace field.

45. ***Pipeline Contingency Plans, in and out?***
There is an approved contingency plan for the pipeline. A copy of the pipeline contingency plan is located at the plant as well as the Henderson County Local Emergency Planning Commission in Athens. We would be glad to answer any specific questions about the plan directly with you.

46. ***Well failures, spills, etc.***
Dynegy does not operate any wells. However, to our knowledge there have not been any well failures, spills, etc.

47. ***Well contingency plans?***
Dynegy does not operate any wells. Each producer has its own contingency plan.

48. ***Does anything that the plant processes, produces or emits contain benzene?***
The plant processes natural gas liquids which contain small quantities of benzene.