

**From:** [Jonathan Walling](#)  
**To:** [Haley, Nicole](#); [Kennebeck, David](#)  
**Cc:** [OCE](#)  
**Subject:** RATA Extension- Magellan CC  
**Date:** Wednesday, September 16, 2020 11:49:34 AM  
**Attachments:** [20200914 RATA Extension Request COVID-19 v3.pdf](#)  
[ATT00001.htm](#)

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Good morning, Ms. Haley:

The TCEQ has evaluated your request for enforcement discretion to extend the deadline to perform Relative Accuracy Test Audits for Magellan's [REDACTED] process heaters (EPNs H-1A & H-1B) at its Corpus Christi Splitter Facility. These tests are required by [REDACTED] of Magellan's New Source Review Permit 118270 and Title V Permit 0-3882.

Magellan is currently operating under TCEQ enforcement discretion approved on July 1, 2020, which is valid through September 18, 2020. The TCEQ will grant an additional extension which will be valid through December 13, 2020. The required tests shall be completed by this date, or within 10 days of the facility reaching 50% operational capacity, whichever occurs first. This approval supersedes the extension approved on July 1, 2020, which was based on a process upset at the facility.

Magellan must maintain records adequate to document activities related to any noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply, inclusive of operational capacity records.

Regards,

Jonathan Walling, Area Director  
Coastal & East Texas Area  
Texas Commission on Environmental Quality

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**From:** Haley, Nicole <[REDACTED]>  
**Sent:** Monday, September 14, 2020 4:24 PM  
**To:** Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>; Jonathan Walling <[jonathan.walling@tceq.texas.gov](mailto:jonathan.walling@tceq.texas.gov)>  
**Cc:** Kennebeck, David <[REDACTED]>  
**Subject:** RATA Extension

Afternoon,

Please find attached a COVID-19 extension request for testing. If you have any questions or need additional information please let me know.

Thank you,  
Nicole Haley





1802 Poth Lane  
Corpus Christi, TX 78407  
(361) 903-1101

September 14, 2020

*Via email:*

[Ramiro.Garcia@tceq.texas.gov](mailto:Ramiro.Garcia@tceq.texas.gov)

[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)

**RE: Enforcement Discretion Request – Extension of Testing Deadline for Heaters Relative Accuracy Test Audits (RATAs) for [REDACTED] for Process Heaters (EPNs: H-1A & H-1B)  
Magellan Processing, L.P. (Magellan) – Corpus Christi Splitter  
CN604541797; RN102536836; Air Permit 118270; Affected Permit: O-3882;**

Magellan Processing, L.P. (Magellan) is requesting an additional enforcement discretion to extend the test deadline for the required Continuous Emissions Monitoring Systems (CEMS) Relative Accuracy Test Audit (RATA) for our process heaters (EPN: H-1A & H-1B) at our Corpus Christi Splitter facility. This is required once every three years. The last RATAs were conducted June 13, 2017.

Magellan previously requested and received enforcement discretion which is valid until September 18, 2020. Testing was scheduled for September 14; however, based on the market demand for petroleum products and the lack of feedstock availability, affected by COVID-19, Magellan received curtailment instructions [REDACTED] to operate at reduced rates. Currently, the facilities are only operating at 25% capacity. In order for the RATA to be completed the facilities need to operate at least 50% capacity.

In the event that storage capacity and/or feedstock availability restricts us from testing at 50% we request to test at the current rates or request enforcement discretion to extend the RATA deadline until December 31, 2020.

Citation of rule/permit provision for which enforcement discretion is requested:  
New Source Review Permit: 118720 [REDACTED] and Title V Permit: O-3882.

If you have any questions or concerns regarding this request, please contact me at (361) 206-9956 or via email at [REDACTED].

Thank you,  
Nicole Haley  
Environmental Air Specialist