

From: [Jonathan Walling](#)
To: [Haley, Nicole](#); [Kennebeck, David](#)
Cc: [OCE](#)
Subject: 20201027 Corpus Splitter Covid-19 Heater Discretion.pdf
Date: Thursday, October 29, 2020 11:50:33 AM
Attachments: [20201027 Corpu Splitter Covid-19 Heater Discretion.pdf](#)

Good morning, Ms. Haley:

The TCEQ has evaluated your request for enforcement discretion.

As presented, this request does not appear to be directly COVID-related. Therefore, enforcement discretion through this mechanism is not appropriate. In addition, blanket enforcement discretion requests are not considered through this process. Each request for discretion must provide a time frame by which the regulated entity anticipates returning to compliance.

For further direction, please consider speaking with the TCEQ Region 14 Office-Corpus Christi. In addition, you may wish to consider speaking TCEQ's Air Permits Division to see if MAERT limits based on the variable firing rates can be developed.

Regards,

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

From: Haley, Nicole [REDACTED]
Sent: Tuesday, October 27, 2020 4:52 PM
To: Jonathan Walling <jonathan.walling@tceq.texas.gov>
Cc: Kennebeck, David [REDACTED]
Subject: 20201027 Corpu Splitter Covid-19 Heater Discretion.pdf

Good Afternoon,

Attached please find a request for enforcement discretion concerning emission limit exceedances due to COVID-19 at our Corpus Christi Splitter facility. If you need additional information or have any questions please contact me. Hope you have a goo day.

Thank you,
Nicole Haley
Environmental Air Specialist
[REDACTED]

Office: [\(361\)903-1151](tel:(361)903-1151)

Mobile: [\(361\)206-9956](tel:(361)206-9956)

Cell: [\(281\) 386-1621](tel:(281)386-1621)



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

October 27, 2020

Via email:

Ramiro.Garcia@tceq.texas.gov

OCE@tceq.texas.gov

**RE: Enforcement Discretion Request – 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 enforcement discretion for Process Heaters H-1A and H-1B (EPN: H-1A & H-1B) at our Corpus Christi Splitter facility.

Based on the market demand for petroleum products and the lack of feedstock availability, affected by COVID-19, in May 2020 Magellan received curtailment instructions [REDACTED] to operate at reduced rates. Currently, the facilities are only operating near 50% capacity. We recently discovered that the reduced firing rates on the heaters have generated an intermittent and ongoing increase of permitted NOx lb/MMbtu, CO ppmv, and [REDACTED] ppmv above authorized limits. It should be noted that we continue to meet the applicable federal standards and mass emission rates (lb/hr and t/yr) in the Maximum Emissions Rate Table (MAERT). Magellan is requesting Enforcement Discretion for the increased emissions due to the reduced firing rates as long as we maintain compliance with applicable federal standards and permitted mass emission rates. Engineering assessments, operational changes and permitting options to remedy this are underway.

Citation of rule/permit provision for which enforcement discretion is requested:
New Source Review Permit: 118720 S.C. 17.A. and B. 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,

DM Kennebeck for Nicole Haley

Nicole Haley
Environmental Air Specialist