

**From:** [David Ramirez](#)  
**To:** [Lee, Travis](#)  
**Cc:** [OCE](#); [Kennebeck, David](#); [Anita Keese](#); [Ramiro Garcia](#)  
**Subject:** RE: Enforcement Discretion Request - Extension of Testing Deadline for Vapor Combustion Unit: Magellan Pipeline Terminals, L.P.; Odessa Terminal; CN603167297; RN100244979  
**Date:** Tuesday, June 30, 2020 1:54:44 PM

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Good afternoon Mr. Lee,

The TCEQ has received your request for enforcement discretion for the Odessa Terminal (RN100244979) owned and operated by Magellan Pipeline Terminals, L.P. and Magellan Midstream Partners, L.P. Your request was evaluated in accordance with the representation in your request for:

- The delay of testing for the Vapor Combustion Unit (VCU) authorized under Standard Permit No. 158352 which requires testing of the VCU in accordance with 40 CFR 60.8 (Performance Tests), 40 CFR 60.503 (Test Methods) and 40 CFR 63.11092, Subpart BBBBBB to verify emissions from Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.

Your enforcement discretion, however, is only effective **until September 30, 2020**. The TCEQ remains committed to working with our regulated community on a case by case basis. This required activity should be completed as soon as practicable, as conditions allow, before this date and should an extension beyond this be needed, please re-submit your request. This discretion is limited to the Texas Commission on Environmental Quality and does not limit EPA's ability to enforce federal regulations.

Regulated entities must maintain records adequate to document activities related to the noncompliance under enforcement discretion, including details of the regulated entity's best efforts to comply.

Regards,  
David A. Ramirez, Area Director  
Border and Permian Basin Area  
Texas Commission on Environmental Quality

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**From:** Lee, Travis <[REDACTED]>  
**Sent:** Friday, June 26, 2020 3:52 PM  
**To:** Ramiro Garcia <[ramiro.garcia@tceq.texas.gov](mailto:ramiro.garcia@tceq.texas.gov)>  
**Cc:** OCE <[OCE@tceq.texas.gov](mailto:OCE@tceq.texas.gov)>; Kennebeck, David <[REDACTED]>  
**Subject:** Re: Enforcement Discretion Request - Extension of Testing Deadline for Vapor Combustion Unit: Magellan Pipeline Terminals, L.P.; Odessa Terminal; CN603167297; RN100244979

Hello, please find the attached enforcement discretion request for the extension of testing a vapor combustion unit at Magellan's Odessa Terminal, Ector County, Texas.

If you have any question please don't hesitate to email me or call my cell phone.

Thank you,

Travis Lee  
Sr. Environmental Air Specialist



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June 26, 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 Vapor Combustion Unit Unit 1 (EPN: VCU)  
Magellan Pipeline Terminals, L.P. (Magellan) – Odessa Terminal  
Air Permit 158352; Affected Permit: O-9746; CN603167297; RN100244979**

Magellan Pipeline Company, L.P. is requesting enforcement discretion to extend the testing deadline 6 months for a Vapor Combustion Unit (EPN: VCU) at our Odessa Terminal. The backup VCU started up on January 26, 2020, with the initial testing due by July 24, 2020. The testing will be completed as soon as possible, but no later than January 20, 2021.

Testing was originally scheduled for March 26, 2020, however due to travel restrictions imposed by the COVID-19 pandemic March 2020 through May 2020, initial testing on the VCU was postponed until June 11, 2020. On June 11, 2020, the VCU experienced equipment malfunctions that prevented the unit from being tested. The test is tentatively rescheduled for July 16, 2020, however, there is concern of reduced loading demand for gasoline and uncertainty if travel restrictions will return at that time. For these reasons we are requesting enforcement discretion to extend the testing deadline six months.

Citation of rule / permit provision for which enforcement discretion is requested:  
Pollution Control Projects Air Quality Standard Permit: 158352, Affected Permit: O-9746; 40 CFR Part 60 Subpart XX and 40 CFR 63 Subpart BBBB.

If you have any questions or concerns regarding this request, please contact me at 918-574-7961 or via email at [REDACTED]

Respectfully,

A handwritten signature in blue ink, appearing to read "Travis Lee".

Travis Lee  
Sr. Environmental Air Specialist

cc: Tulsa File/Air Quality/Odessa Terminal