

From: [Jayme Sadlier](#)
To: [REDACTED] [Darcey, Larry](#); [Palmer, Todd B.](#); [REDACTED]
Cc: [Ramiro Garcia](#); [TCEQR12AIR](#); [Jonathan Walling](#); [OCE](#); [Susan Johnson](#); [Tracy Miller](#)
Subject: Re: 2019 Galveston Bay Refinery Industrial Wastewater Alternate Control Annual Report
Date: Wednesday, April 1, 2020 9:46:01 AM
Attachments: [2019 GBR IWW Report.pdf](#)

Ms. Davis,

During the COVID-19 pandemic, the TCEQ is accepting electronic versions of documents if a customer is unable to mail or otherwise deliver a hard copy document, as required by permit/rule/statute. Dedicated email addresses, by TCEQ Region, have also been set-up for receiving the documents <35MB in size during the pandemic. The TCEQ Houston Region email (TCEQR12AIR@tceq.texas.gov) has been cc:ed on this email, so please consider the attached report received by the TCEQ Houston region.

The TCEQ-region specific email addresses will be posted on the TCEQ public website soon. In the meantime, if you have additional air program documents for this facility that you are unable to provide as a hard copy, please utilize the TCEQR12AIR@tceq.texas.gov address and provide a brief summary within the body of your email describing the COVID-19 circumstance preventing the hard copy submittal. If you have an electronic document >35MB, please send an email to TCEQR12AIR@tceq.texas.gov to request a file transfer protocol. Please only use this email address if you are unable to provide the submittal via postal mail.

Once the COVID-19 pandemic has ended, please resume providing hard copies with original signatures, if required. You do not need resubmit, by hard copy, the underlying report/data already electronically-submitted during the pandemic timeframe.

Thank you,
Jayme Sadlier, Special Assistant
TCEQ Office of Compliance and Enforcement

From: Davis, Erica F. <[REDACTED]>
Sent: Tuesday, March 31, 2020 4:30 PM
To: OCE <OCE@tceq.texas.gov>; Ramiro Garcia <ramiro.garcia@tceq.texas.gov>
Cc: Darcey, Larry <[REDACTED]> Palmer, Todd B.
<[REDACTED]> Clingan, Mark A. <[REDACTED]>
Subject: 2019 Galveston Bay Refinery Industrial Wastewater Alternate Control Annual Report

To Whom it May Concern,

The attached report is the Industrial Wastewater Alternate Control Annual Report for the Blanchard Refining Company LLC, Galveston Bay Refinery. Due to COVID-19 this report is being sent electronically. If there are any questions or comments regarding this correspondence, please contact myself (Erica Davis) at [REDACTED]

Thank you,

Erica Davis
409-942-4547



Larry G. Darcey, P.E.
Environmental Supervisor
Galveston Bay Refinery

Blanchard Refining Company LLC

A subsidiary of Marathon Petroleum Company LP

P. O. Box 401
2401 5th Avenue South
Texas City, TX 77592
Tel: 409.945.1011
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March 31, 2020

Electronically Sent

Executive Director, MC-109
Texas Commission on Environmental Quality
P. O. Box 13087
Austin, TX 78711-3087

**RE: Annual Report – Industrial Wastewater Alternate Control
Blanchard Refining Company LLC, Galveston Bay Refinery
TCEQ Air Account No.: GB-0004-L; Regulated Entity No. 102-535-077**

Executive Director:

Pursuant to 30 TAC 115.143(b)(2), Blanchard Refining Company LLC (Blanchard) herein submits its 2019 Industrial Wastewater Rule Alternate Control Annual Report (2019 Annual Report) for its Galveston Bay Refinery (GBR) as Attachment 1.

Blanchard incorporated for the first time VOC emissions from GBR's flumes into the 2016 Annual Report; VOC emissions from the flumes were not considered in prior year analyses. Blanchard suspects that in 1990 when the baseline EI was developed, the prior owner of the refinery did not consider the flumes to be subject to the rule because the flumes are intended for stormwater only and thus would be outside the scope of the rule. However, this assumption may be in error as process wastewater containing VOCs may have always been in the flumes during normal operation because process wastewater had been capable of overflowing into the flumes during heavy rainstorm events (requiring GBR to treat the water in the flumes in its wastewater treatment plant). It is therefore possible that the flumes were subject to the Industrial Wastewater Rule and emissions should have also been included in the 1990 baseline.

Blanchard has not updated the 1990 baseline to include VOC emissions from the flumes since data does not exist to accurately quantify those emissions. Therefore, a quantitative comparison cannot be performed between current year's emissions and the 1990 baseline. Notwithstanding, the design and operation of the wastewater collection and treatment system has changed significantly since 1990. Notably, 40 CFR Part 61, Subpart FF (BWON), required controls on wastewater collection and treatment and since that time the refinery has made significant efforts to remove process water from the flumes. Therefore, if the 1990 baseline flume emissions had been reported by the previous owner(s) they would have been significantly higher than those in recent reporting years. Additionally, in a federal Consent Decree, Blanchard agreed to "prevent overflows" of wastewater "from directly entering the flumes" by December 31, 2019. That project has been completed and the issue regarding flume VOC emissions will not continue.

In Attachment 2, the emission rates have been calculated in a manner consistent with the 1990 baseline EI. Plot plans showing the location of the associated EPN/FINs are provided in Attachment 3. The 2019 Annual Report demonstrates that the overall VOC emissions from GBR's "wastewater storage, handling, transfer, or treatment facility" are at least 90% less than the 1990 baseline emissions inventory (EI) when VOC emissions from the flumes are excluded from the 2019 total. Qualitatively Blanchard believes that if the the flume VOC emissions were included in the 1990 baseline analysis the reductions would still be greater than 90%.

If you have any questions or concerns regarding this report, please contact Erica Davis at (409) 942-4547.

Sincerely,



Larry G. Darcey, P.E
Environmental Supervisor
Galveston Bay Refinery

ED/dm

Attachment 1 – Annual Report – Industrial Wastewater Alternate Control

Attachment 2 – Calculation of Emission Rates

Attachment 3 – Plot Plan of the associated EPN/FINs

cc: Texas Commission on Environmental Quality
5425 Polk Avenue, Suite H
Houston Regional Office
Houston, TX 77023-1486

Attachment 1

Chapter 115 - Annual Waste Water Alternate Control Compliance Report for Year 2019

**Galveston Bay Refinery
Blanchard Refining Company LLC
Account No. GB-0004-L**

FIN	EPN	1990 Emission Rate, TPY	2019 Emission Rate, TPY
DAF-WW	291	111.10	0.11
SEP-1-SEWLS	F-255	42.80	0*
SEP2-SEWLS	F-265	71.20	0*
SEP3ASEWLS	F-275	85.50	0*
SEP3BSEWLS	F-276	85.50	0*
SEP-1-FUGIT	F-250	101.50	0*
SEP2-FUGIT	F-260	162.00	0*
SEP3AFUGIT	F-270	200.80	0*
SEP3BFUGIT	F-271	200.80	0*
PS3A-OWSEP	46	45.60	0.012
PS3A-47	47	0.05	0.003
PS3A-56	56	38.90	0.003
Blowdown Stacks		36.10	0*
F-215	280-F215	1.60	1.85
F-216	280-F216	0.77	0.035
T280-1054	280-1054	4.80	2.91
T280-1056	280-1056	5.29	2.85
T280-1057	280-1057	0.00	2.82
T280-1058	280-1058	0.00	1.23
BIO-1	F-8	15.24	10.50
BIO-2	F-9	15.24	11.15
Tk-F-10	F-10	0.16	0.314
Tk-F11	F-11	0.16	0.314
Tk-F22	F-22	0.01	0.014
Tk-F30	F-30	0.01	0.022
Flumes		***	141.50
EOL-1	Unit Dry Weather Sumps	0**	0.002
EOL-2	Unit Dry Weather Sumps	0**	2.39
Overall Total without Flumes		1225.12	36.54
% Reduction over 1990 baseline = 97.02			
Overall Total with Flumes		1225.12	178.04
% Reduction over 1990 baseline = 85.47			

Note:

* The equipment is no longer in service.

** Used 1990 baseline emissions of zero to include this source as a conservative assumption.

***Emissions have not been calculated

Attachment 2

**2019 DNF Emissions
Galveston Bay Refinery
Blanchard Refining Company LLC**

DNF Wastewater - EPN 291 (FIN: DAF-WW)

Waste Water flow to DNF's 17.33 MMGal/day

Emissions with 99.9% control efficiency of Flare:

17.33	MMGal/day	365 days	33.44	lb VOC	1 ton	(1-0.999)	=	0.11	TPY VOC
		yr		MMgal WW	2000 lb				

2019 Unit Dry Weather Sump Emission Calculations
Galveston Bay Refinery
Blanchard Refining Company LLC

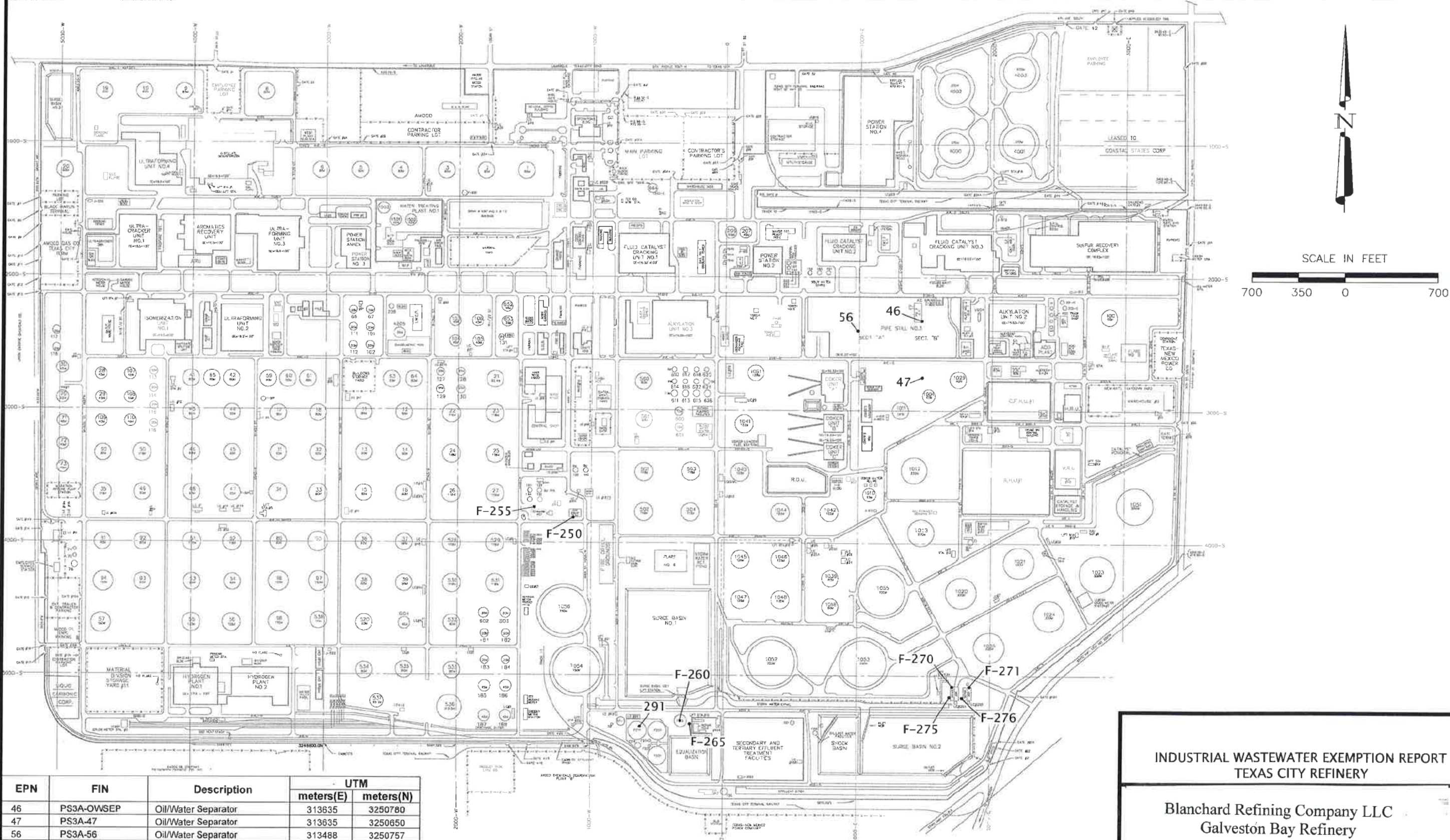
FIN	EPN	2019 Waste Stream Flow (MMgal)	Average Concentration (microgram/l)	Control Efficiency	Total VOCs (TPY)*
EOL-1	Unit Dry Weather Sumps	370.53	67.30	0.98	0.002
EOL-2	Unit Dry Weather Sumps	1071.89	535.07	0.00	2.39

*Calculations assume complete volatilization

**2019 API Separators Emissions
Galveston Bay Refinery
Blanchard Refining Company LLC**

Separator	FIN	EPN	Value Source	2019 Value	Unit
#1	SEP1-FUGIT	F-250	No longer in service	0.000	tons
#2	SEP2-FUGIT	F-260	No longer in service	0.000	tons
#3A	SEP3AFUGIT	F-270	No longer in service	0.000	tons
#3B	SEP3BFUGIT	F-271	No longer in service	0.000	tons
#3B	SEP3BSEWLS	F-276	No longer in service	0.000	tons
PS3A	PS3A-OWSEP	46	Emission values from 2019 EI	0.012	tons
PS3B South	PS3A-56	56	Emission values from 2019 EI	0.003	tons
PS3B North	PS3A-47	47	Emission values from 2019 EI	0.003	tons

Attachment 3



EPN	FIN	Description	UTM	
			meters(E)	meters(N)
46	PS3A-OWSEP	Oil/Water Separator	313635	3250780
47	PS3A-47	Oil/Water Separator	313635	3250650
56	PS3A-56	Oil/Water Separator	313488	3250757
291	DAF-WW	Dissolved Air Flotation Units	312994	3249847
F-250	SEP-1-FUGIT	Oil/Water Separator No. 1	312840	3250327
F-255	SEP-1-SEWLS	Separator No. 1 Sewer	312751	3250351
F-260	SEP2A-FUGIT	Oil/Water Separator No. 2	313087	3249861
F-265	SEP2-SEWLS	Separator No. 2 Sewer	313109	3249854
F-270	SEP3AFUGIT	Oil/Water Separator No. 3A	313710	3249940
F-271	SEP3BFUGIT	Oil/Water Separator No. 3B	313750	3249940
F-275	SEP3ASEWLS	Separator No. 3A Sewer	313703	3249916
F-276	SEP3BEWLS	Separator No. 3B Sewer	313733	3249914

INDUSTRIAL WASTEWATER EXEMPTION REPORT TEXAS CITY REFINERY

Blanchard Refining Company LLC
Galveston Bay Refinery

DRAWN BY: W.B. PROJECT NUMBER: 50-02173.02
CHECKED BY: T.T. FILE NUMBER: 02173.02ww-1.dwg
APPROVED BY: T.T. DATE: 3/24/2003



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