

From: [Jonathan Walling](#)
To: [REDACTED]
Cc: [OCE](#); [Clingan, Mark A.](#); [Sweeley, Brian J.](#); [Livings, Vicky G.](#); [Kaysen, Eric R.](#); [Cade, Ruth A.](#); [Bogard, Kevin D.](#)
Subject: MPC Request #3 related to COVID-19 Response - Blanchard GBR
Date: Tuesday, May 5, 2020 4:01:36 PM
Attachments: [image001.png](#)
Importance: High

Good afternoon, Mr. Darcey:

The TCEQ has reviewed Blanchard Refining Company LLC Galveston Bay Refinery's request for enforcement discretion to delay compliance testing at the Dock 30 F-708 Thermal Oxidizer (EPN 294-2) and to delay hydrogen cyanide stack testing at Fluid Catalytic Cracking Unit No. 3 (FCCU3, EPN 34A), as required by 40 CFR 63 Subpart Y, Special Condition 41 of Air Permit No. 47256 and Title V Permit No. O-1541.

Your request for enforcement discretion, as presented, is approved and will be valid until July 10, 2020. The required activities should be completed as soon as practicable, as conditions allow, before this date. Should an extension beyond this be needed, please submit a request to extend this date.

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,

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

From: Darcey, Larry <[REDACTED]>
Sent: Tuesday, May 5, 2020 11:16 AM
To: Ramiro Garcia <ramiro.garcia@tceq.texas.gov>; OCE <OCE@tceq.texas.gov>
Cc: Clingan, Mark A. <[REDACTED]> Sweeley, Brian J.
<[REDACTED]> Livings, Vicky G. <[REDACTED]>
Kaysen, Eric R. <[REDACTED]> Cade, Ruth A.
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<[REDACTED]> Elizondo, Julian J. <[REDACTED]> Bordes, Randy M.
<[REDACTED]>
Subject: RE: MPC Request #3 related to COVID-19 Response - Blanchard GBR

Importance: High

Mr. Garcia,

Please find the following enforcement discretion requests for the Blanchard Refining Company LLC (Blanchard) Galveston Bay Refinery (GBR) due to impacts from the COVID-19 pandemic. (Air Account # GB-0004-L, RN 102535077, CN 604166868)

Request #1: Blanchard is requesting enforcement discretion to delay compliance testing at the Dock 30 F-708 Thermal Oxidizer (EPN 294-2) as required by 40 CFR 63 Subpart Y and Special Condition 41 of Permit No. 47256 on June 10, 2020 and April 26, 2020, respectively.

Request #2: Blanchard is requesting enforcement discretion to delay Hydrogen Cyanide (HCN) stack testing at Fluid Catalytic Cracking Unit No. 3 (FCCU3, EPN 34A) as required by Special Condition 41 of Permit No. 47256 by May 5, 2020.

Reason for Requests #1 & #2: Due to lower market demand resulting from the COVID-19 pandemic, Dock 30 and FCCU3 are not operating at sufficient throughput and production rates for the testing to be representative of worst case operating scenarios. Therefore, in order to perform a valid performance test the testing will need to be delayed until more representative maximum rates are achieved. The length of the delay is also necessary since a scheduled turnaround will impact rates during the month of June 2020.

Duration: Blanchard requests approval to delay the performance testing until at least July 31, 2020. If sufficient production rates are not achievable by that date, Blanchard will request another extension to ensure the tests are conducted at proper operating conditions.

Rule Citation/Permit Condition: 40 CFR 63 Subpart Y, Special Condition 41 of Air Permit No. 47256 and Title V Permit No. O-1541 GBR

Mitigation Measures: No mitigation measures are planned since stack testing will occur in a timely manner when necessary operating rates are achieved. There will be no impact to the environment by delaying these performance tests.

Thank you for your time and consideration with this matter. If you have any questions or comments please feel free to contact me at (409) 502-9009 or [REDACTED]

Sincerely,

Larry G. Darcey, P.E.

Environmental Supervisor
Marathon Petroleum Company



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