



Air Pollutant Watch List Public Comment Form

Date Received: July 12, 2007

APWL Site Under Consideration

County: Galveston City: Texas City TCEQ Region: 12 Houston

APWL Site Number (for existing sites): 1203

Pollutant(s): benzene

Comment(s):

The Galveston-Houston Association for Smog Prevention, Industry Professionals for Clean Air, Mothers for Clean Air and Public Citizen are pleased that increased attention to benzene emissions in APWL Site No. 1203 (Texas City) apparently has resulted in a significant decrease in average annual benzene concentrations, below the long-term, health-based effects screening level (ESL). However, precisely because this increased attention appears to be doing so well, we are reluctant to endorse removal of this site from the APWL program. We have several specific concerns as well.

First, reports of annual average benzene concentrations do not indicate whether or not there have been significant spikes in benzene emissions during the covered period. The additional scrutiny afforded by the APWL program encourages the covered facility to not only control annual emissions, but also to take the important precautions necessary to avoid significant short-term releases.

Second, we appreciate that the TCEQ apparently is requiring the covered facility, owned by Black Marlin Pipeline Co., to *strictly monitor flare activities*. It is unclear from the proposal, however, whether this involves continuous monitoring of assist gas and heat content in the flow to the flare. Also, the proposal does not indicate that the monitoring data will be easily accessible by the public, or what action, if any, the company may be required to take if the monitoring indicates flare emissions above permitted levels.

Third, flares may not be the only source of excess benzene emissions. Except for the reference to the monitoring of flare activities, the proposal does not identify the source of the benzene emission problem, or whether the downward trend in benzene emissions is the result of removing the source, or simply a temporary fix. Therefore, we recommend that there be frequent monitoring of any potential source of benzene.

Finally, the proposal does not indicate whether or not the AutoGC at the Texas City Continuous Ambient Monitoring Station (CAMS) 620 will continue to monitor benzene concentrations if Site No. 1203 is removed from the APWL program.

Accordingly, we ask that the TCEQ, prior to removing APWL Site No. 1203 (Texas City), clarify that it will diligently monitor benzene emissions in the area such that the emission reductions continue to decrease as they have under the APWL program, rather than increase. Specifically, we ask that the TCEQ:

- 1) monitor short- and long-term ambient benzene concentrations in the area;
- 2) scrutinize Black Marlin operations to ensure that benzene emissions from the facility are accurately monitored and reported, and that all reasonable measures for reducing benzene emissions are taken; and
- 3) ensure that permits for new or expanded facilities will not authorize additional benzene emissions that will increase concentrations above ESLs.

In sum, we believe the TCEQ should focus its resources on ensuring that the Black Marlin facility, and any other facilities built in the area, continue to comply with all requirements related to benzene emissions.



Response to APWL Comment Submitted by GHASP

Date: July 19, 2007

APWL Site Under Consideration

County: Galveston City: Texas City TCEQ Region: 12 Houston

APWL Site Number (for existing sites):1203

Pollutant(s): benzene

Although TCEQ received several comments covering a variety of topics, we have compiled and responded only to comments directly related to the proposed removal of APWL Site #1203 from the APWL.

1. **Comment:** ...reports of annual average benzene concentrations do not indicate whether or not there have been significant spikes in benzene emissions during the covered period.

Response: In the past, there have been a significant number of notable hourly benzene concentrations, or “spikes”, reported at Community Air Toxics Monitoring Stations (CAMS) 620, which is located on 34th Street on Texas City. There were 113 notable hourly benzene concentrations in 2004. The number of notable benzene concentrations has exhibited a downward trend. There were 18 notable benzene concentrations in 2005, 4 notable benzene concentrations in 2006, and there have been no notable benzene concentrations reported in the first six months of 2007.

2. **Comment:** Second, we appreciate that the TCEQ apparently is requiring the covered facility, owned by Black Marlin Pipeline Co., to *strictly monitor flare activities*. It is unclear from the proposal, however, whether this involves continuous monitoring of assist gas and heat content in the flow to the flare. Also, the proposal does not indicate that the monitoring data will be easily accessible by the public, or what action, if any, the company may be required to take if the monitoring indicates flare emissions above permitted levels.

Response: A Notice of Enforcement was issued against Black Marlin Pipeline Company in 2005 as a result of an investigation conducted by the Galveston County Health District. The company was cited a violation for failing to record at least 98% of the required daily flare observations in the daily flare operation log during the year 2004 which is a violation of 30 Tex. Admin. Code § 111.111(a)(4)(A)(ii). As a result of the agreed order, Black Marlin developed and implemented a permanent process to insure that all flare observations are completed. For specifics regarding the enforcement aspect of the investigation,

please contact Richard Clarke at (512)-239-2368 or by e-mail at rclarke@tceq.state.tx.us.

- 3. Comment:** Also, the proposal does not indicate that the monitoring data will be easily accessible by the public...

Response: All monitoring data is available upon request from our Data Management section. Please contact Tom Porter at (512) 239-1722 or by e-mail at toporter@tceq.state.tx.us.
- 4. Comment:** ...flares may not be the only source of excess benzene emissions. Except for the reference to the monitoring of flare activities, the proposal does not identify the source of the benzene emission problem...

Response: As indicated in the proposal, the primary source of benzene emissions in this area was identified as Black Marlin Pipeline Company by using the wind directional data collected at CAMS 620, as well as monitored concentrations reported during a 2004 mobile monitoring project conducted in the area. Other benzene sources were suggested by the Galveston County Health District, which included various gas stations in the surrounding area. However, our evaluation considered these sources to be minor contributors. Current benzene source identification indicates that low levels of benzene are detected in all directions with respect to the monitoring location.
- 5. Comment:** ...the proposal does not indicate whether or not the AutoGC at the Texas City Continuous Ambient Monitoring Station (CAMS) 620 will continue to monitor benzene concentrations if Site No. 1203 is removed from the APWL program.

Response: CAMS 620 will remain in place and therefore we will continue to monitor VOC levels in this area of Texas City. The TCEQ will continue to monitor benzene, as well as other VOCs, in this area of Texas City to insure such concentrations remain below a level of concern even after this area is removed from the APWL.