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**RE: [External] RE: ETC/Department Meeting Today (4/21) - Update/Questions**

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**From** Frisco, Doug <Doug.Frisco@energytransfer.com>

**Date** Tue 4/28/2026 12:08 PM

**To** Brusceci, Alexis <abusceci@pa.gov>

**Cc** Garcia, Lisa M <Lisa.Garcia@energytransfer.com>; Garcia, Mario <mario.garcia@energytransfer.com>

Alexis,

We are waiting for a response on the RMP questions from another group internally and will get that to you as soon as we hear back.

Here is the revised summary of the inlet gas composition methodology.

*The representative gas composition for the Rev Cryo II facility Potential to Emit (PTE) calculations was determined via ProMax process simulation using gas composition readings sourced from the Galaxy and Pike gathering station outlets (upstream facilities supplying gas to the Revolution facility). The simulation evaluated the gas stream under varying ambient conditions to ensure a conservative and accurate inlet profile. A comparative analysis of this composition against five-year historical records indicates minimal to no variability, confirming the data as a reliable baseline for emission modeling. This composition served as the primary input for calculating the facility's PTE.*

*To ensure ongoing compliance, actual emissions will be determined based on an average of the four quarterly inlet gas samples collected per the facility operating permit conditions. The average of these four samples will be used as the inlet gas composition to run a Promax process simulation generating emission rates for other streams/equipment within the facility. Those calculated emission rates will then be applied to process emission sources based on recorded hours of operation.*

Please let us know if you need anything further on the gas composition.

Thanks,

Douglas Frisco  
Sr. Manager, Environmental Compliance  
Energy Transfer  
O: 570.505.3730  
M: 215.630.5563

-----Original Message-----

**From:** Brusceci, Alexis <abusceci@pa.gov>

**Sent:** Tuesday, April 28, 2026 11:51 AM

**To:** Garcia, Lisa M <Lisa.Garcia@energytransfer.com>; Garcia, Mario <mario.garcia@energytransfer.com>

**Cc:** Frisco, Doug <Doug.Frisco@energytransfer.com>

**Subject:** Re: [External] RE: ETC/Department Meeting Today (4/21) - Update/Questions

Hi Mario and Lisa,

The Department does not have any additional questions at the time and is going to cancel today's meeting (4/28). I will be using that time to continue to draft the permit conditions. I will have an updated timeline to you by the

end of the week.

Regarding the questions sent via email on 4/21/26, the Department is still waiting on responses to the following questions:

Questions regarding the Risk Management Plan:

1.

Does the ETC Revolution Cryo I facility currently have a regulated substance(s) listed in 40 CFR § 68.130 present in a process in more than a listed threshold quantity at the facility?

\* If yes, what substance(s) and what quantities?

\* If yes, has a Risk Management Plan been submitted to the U.S. Environmental Protection Agency (EPA)?

\* If yes, what was the date of the submittal?

2. Will the ETC Revolution Cryo 1 and Cryo 2 have a regulated substance(s) listed in 40 CFR § 68.130 present in a process in more than a listed threshold quantity at the facility?

\*

If yes, what substance(s) and what quantities?

Additional Questions:

1.

As discussed in the last meeting, can you please edit the inlet gas composition methodology provided via email on 4/7/26 to include the frequency of samples that are taken to arrive at the average.

Thank you for getting some responses back to me last week. Please respond to the remaining questions as soon as possible and please let me know if you have any additional questions.

Best regards,

Alexis Brusceci | Air Quality Engineering Specialist Department of Environmental Protection | Air Quality Program Southwest Regional Office

400 Waterfront Dr. | Pittsburgh, PA 15222

Phone: 412.442.5800

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From: Garcia, Lisa M <[Lisa.Garcia@energytransfer.com](mailto:Lisa.Garcia@energytransfer.com)>

Sent: Thursday, April 23, 2026 9:44 AM

To: Brusceci, Alexis <[abusceci@pa.gov](mailto:abusceci@pa.gov)>; Garcia, Mario <[mario.garcia@energytransfer.com](mailto:mario.garcia@energytransfer.com)>

Cc: Frisco, Doug <[Doug.Frisco@energytransfer.com](mailto:Doug.Frisco@energytransfer.com)>

Subject: [External] RE: ETC/Department Meeting Today (4/21) - Update/Questions

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Alexis,

I was able to get answers on a couple of the questions below. We will follow up with the remaining answers as soon as possible. Please let me know if you have any questions. Thanks.

2. In regard to the response provided on 4/13/26, please provide the monitoring frequency for each component including valves, pump seals, other gas vapor, other (refrigerant), pump seals, and flanges and connectors.

Response: The monitoring frequency is quarterly for each component type.

3. Please provide a regulatory analysis for the VRU compressors.

Response: The VRU compressors will be subject to NSPS OOOOb. ETC will comply with the requirements as outlined in 60.5385b by either:

1. Making initial and periodic measurements of volumetric flow to show it does not exceed 2 standard cubic feet per minute (scfm) per individual cylinder or changing or replacing the packing within 90 days after a measurement that exceeds 2 scfm per cylinder and measuring flow to confirm repair; or

2. Changing rod packing on or before 8,760 hours of operation after startup, or every 8,760 hours after the previous flow rate measurement, or on or before 8,760 hours of operation after the date of the most recent rod packing replacement.

Lisa M. Garcia, P.E.  
Sr. Manager – Engineering  
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-----Original Message-----

From: Brusceci, Alexis <[abrusceci@pa.gov](mailto:abrusceci@pa.gov)>

Sent: Tuesday, April 21, 2026 11:17 AM

To: Garcia, Mario <[mario.garcia@energytransfer.com](mailto:mario.garcia@energytransfer.com)>

Cc: Garcia, Lisa M <[Lisa.Garcia@energytransfer.com](mailto:Lisa.Garcia@energytransfer.com)>; Frisco, Doug <[Doug.Frisco@energytransfer.com](mailto:Doug.Frisco@energytransfer.com)>

Subject: ETC/Department Meeting Today (4/21) - Update/Questions

Hi Mario,

I apologize but I need to cancel today's meeting again, but I do have a few questions:

Questions regarding the Risk Management Plan:

1.

Does the ETC Revolution Cryo I facility currently have a regulated substance(s) listed in 40 CFR § 68.130 present in a process in more than a listed threshold quantity at the facility?

\* If yes, what substance(s) and what quantities?

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2. Will the ETC Revolution Cryo 1 and Cryo 2 have a regulated substance(s) listed in 40 CFR § 68.130 present in a process in more than a listed threshold quantity at the facility?

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If yes, what substance(s) and what quantities?

Additional Questions:

1.

As discussed in the last meeting, can you please edit the inlet gas composition methodology provided via email on 4/7/26 to include the frequency of samples that are taken to arrive at the average.

2.

In regard to the response provided on 4/13/26, please provide the monitoring frequency for each component including valves, pump seals, other gas vapor, other (refrigerant), pump seals, and flanges and connectors.

3. Please provide a regulatory analysis for the VRU compressors.

Please provide a response to these questions by Friday April 27th. I am available tomorrow (4/22) and Thursday (4/23) if you have any questions. Please let me know if you would like to reschedule this week's meeting or give me a call either tomorrow or Thursday.

Thank you,

Alexis Brusceci | Air Quality Engineering Specialist Department of Environmental Protection | Air Quality Program  
Southwest Regional Office

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Phone: 412.442.5800

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