



August 28, 2025

Mario Garcia
Sr. Engineer – Environmental
ETC Northeast Pipeline, LLC
6051 Wallace Road Extension, Suite 300
Wexford, PA 15090

via email: mario.garcia@energytransfer.com

Re: Identification of Technical Deficiencies
ETC Northeast Pipeline, LLC – Revolution Cryogenic Plant
Application for Plan Approval PA-63-01001B
APS No. 1135975, AUTH No. 1533394
Smith Township, Washington County

Dear Mario Garcia:

After conducting an initial technical review of the above referenced application for plan approval, which was received on May 24, 2024, and determined to be administratively complete on May 25, 2025, the Department of Environmental Protection (“Department”) has determined that the application is technically deficient. The specific technical deficiencies are based on applicable laws and regulations, including 25 Pa. Code §127.12(a)(2 and 5), which specify that an application for plan approval shall:

- (2) Contain information that is requested by the Department and is necessary to perform a thorough evaluation of the air contamination aspects of the source.
- (5) Show that the emissions from a new source will be the minimum attainable through the use of the best available technology.

Technical Deficiencies

1. Please provide the date when the site-specific gas analysis for *Cyro Plant Inlet Gas* was taken. [25 Pa. Code §127.12(a)(2)]
2. Per 25 Pa. Code §127.12(a)(5), an application for plan approval must “[s]how that the emissions from a new source will be the minimum attainable through the use of the best available technology, where, per 25 Pa. Code §121.1, best available technology (BAT) is defined as the “[e]quipment, devices, methods or techniques as determined by the Department which will prevent, reduce or control emissions of air contaminants to the maximum degree possible and which are available or may be made available.
 - a. On May 2, 2025, the Department issued a plan approval for a project at MarkWest Liberty Midstream & Resources, LLC, Harmon Creek Gas Processing Plant which implement BAT for the control of fugitive emissions in a two-fold and incorporates both low-emissions valves and welded or flanged connections. The requirements specified by the Texas Commission on Environmental Quality (TCEQ) in its *28VHP LDAR Program* and piping construction standards specified in the TCEQ *Air Permit Technical Guidance for Chemical Sources - Fugitive Guidance* (APDG 6422v2; Revised 6/2018) were implemented. For valves equal to or greater than 1” in diameter, valves designated as *Low-Emissions Valve* (or *Low-E Valve*) were utilized which are warranted by the manufacturer(s) to either not emit greater than 100 ppm of fugitive emissions within the first seven (7) years of service, valves that have been tested by the manufacturer or qualified testing firm to not emit greater than 500 ppm at any time (but 100 ppm on average), and valve extensions (valves of the same type, stem motion, tolerances, surface finishes, loading arrangement, and stem (packing) and body seal material, design, and construction). The use of Low-Emissions Valves will reduce fugitive emissions from valves by 99% or greater as compared to EPA AP-42 emissions factors. Please evaluate this technology for your project. [25 Pa. Code §127.12(a)(5)]
 - b. The Department obtained publicly available information which indicated that natural gas burners with heat input ratings between approximately 10 MMBtu/hr and 42 MMBtu/hr were currently available and capable of achieving <5ppm NO_x with flue gas recirculation (FGR) and without selective catalytic reduction (SCR). ETC’s BAT analysis indicated that “FGR is considered to be technically feasible (for HMO heaters), however, this emission reduction methodology is not carried down, as specifically designed LNBS will be used to demonstrate compliance with the BAT limits outlined in PADEP’s GP-1 permit.” Please note that the standards in PADEP’s GP-1 permit was established in January 2023. Technology has since advanced and improved. General Permit standards should be considered the starting point for the BAT analysis. Please evaluate all potential available control technologies for NO_x emission reduction. [25 Pa. Code §127.12(a)(5)]
 - c. MarkWest committed to constructing and operating a vapor recover unit (VRU) system to capture 100% of the emissions. The proposed use of a VRU will achieve

an overall destruction and removal efficiency (DRE) of 98% or greater when accounting for maintenance outages, will reduce combustion emissions from the flare, and will recover previously wasted product (and associated value), and therefore constitutes BAT for the control of VOC, HAP, and methane (CH₄) from blowdowns, venting, and tanks. ETC's BAT analysis states "based on regulatory requirements for the industry such as NSPS OOOOa, VRU's have a generally accepted control efficiency of 95% which accounts for 5% VRU downtime." Please re-evaluate your BAT proposal based on achieving an overall DRE at 98% or better. [25 Pa. Code §127.12(a)(5)]

You must submit a response fully addressing each of the technical deficiencies set forth above within ten (10) business days of receipt of this correspondence or the Department may deny the application. If you believe that any of the stated deficiencies is not significant, you have the option to request that the Department make a decision based on the information with regard to the subject matter of that deficiency that you have already made available. If you choose this option with regard to any deficiency, you should explain and justify how your current submission satisfies that deficiency. Please be aware that per §127.12(b), "[t]he Department will not approve an application which fails to meet the requirements of [§127.12(a)]."

If you have questions about your application or would like to discuss any of the above items, please contact me at 412.442.5800 or via email at abruscemi@pa.gov.

Sincerely,

Alexis S. Brusceci/ASB
Air Quality Engineer Trainee

CC: PA-63-01001B
New Source Review (Sheri Guerrieri)
OnBase

Lisa Garcia (lisa.garcia@energytransfer.com)
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