

[External] RE: PA-63-01001B Questions

From Garcia, Mario <mario.garcia@energytransfer.com>

Date Tue 2/3/2026 5:21 PM

To Brusceci, Alexis <abrusceci@pa.gov>

Cc Garcia, Lisa M <Lisa.Garcia@energytransfer.com>

 1 attachment (17 MB)

2026-0129 Rev Cryo II FINAL Plan Approval v4.pdf;

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Hi Alexis,

See attached for the updated/revised plan approval application.

The updated application includes the following:

- Revised heater ratings
- Update the overly conservative facility maintenance & miscellaneous blowdown volumes
- Update the overly conservative fugitive component count
- BAT revisions
 - Added control costs and ruled out FGR due to economic infeasibility, similar to the September response letter
- Minor report updates
 - Also included a statement saying that while there are misc. tanks being installed, they are ultimately exempt from permitting

Also, please see our responses to your below email in *red*.

If you have any questions, please let me know.

Thanks,

Mario Garcia
Sr. Engineer - Environmental
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-----Original Message-----

From: Brusceci, Alexis <abrusceci@pa.gov>

Sent: Tuesday, December 2, 2025 8:04 AM
To: Garcia, Mario <mario.garcia@energytransfer.com>
Cc: Garcia, Lisa M <Lisa.Garcia@energytransfer.com>
Subject: PA-63-01001B Questions

Good morning Mario,

It was so nice meeting you, Lisa and everyone else. Thank you for traveling into Pittsburgh to meet me and give the Department a tour of the facility.

Below there are a few questions in regarded to the plan approval applications. These were briefly discussed while at the facility on November 20th. Please provide a response to these questions by December 16th.

1.

In the project description section, it states that the amine sweetening unit will be controlled by a "4.11 million British thermal units per hour (MMBtu/hr) thermal oxidizer." Then in the Introduction section of the BAT Analysis, municipal and county notifications, and throughout the application, it states "a 6.81 MMBtu/hr thermal oxidizer." Please clarify the maximum capacity for the thermal oxidizer. *The 4.11 MMBtu/hr was a typo, it is correctly listed as 6.81 MMBtu/hr in the source list.*

2.

In the introduction section of the BAT Analysis and the municipal and county notifications, it states "ETC is proposing to install ... miscellaneous storage tanks..." I do not see any other conversation about these storage tanks in the application. Please clarify if ETC is proposing additional storage tanks. In addition, please confirm that there is no modification to the existing storage tanks. *The proposed Misc. Tanks are not going to be used to store produced water, condensate, etc. Rather, they will be storing misc. fluids that do not contain hydrocarbons expected to flash off at tank operating conditions such as glycol, methanol, etc. As such, these tanks are exempt from permitting via §127.14(a)(8) Ex. 15 as their capacities will be less than 40 m³ (10,000 gallons) and PTE well below the HAP exemption thresholds. Additionally, ETC is confirming that there are no modifications to the existing storage tanks at the facility.*

3.

Attached is a draft of the new proposed sources for this plan approval application. Can you please review this draft and confirm if all the information is correct. If you have any problems with viewing that document, let me know and I can try to save it a different way. In addition to this list:

- *Generally, looks good. Fugitives should not have a rating, as these are from fugitive leaks from valves, connectors, flanges, etc. and as such, have no inheritance throughput rating for them (See current Cryo I State only operating permit).*

What percent of the total exhaust of the amine unit to the still vent versus the flash gas?

- *The flow rates are provided in the PTE calculations on the permit application package. The flow rate from the Still vent is 5,517 lbs/hr and the flow rate from the flash gas is 115 lbs/hr.*

Can you provide the capacity/rating for Source ID 802:
venting/blowdowns.

- *Similar to the fugitive response above, there are no inherent rating for the venting and blowdown operations. These, unlike a heater for instance, do not have a rated capacity.*

4.

Please review the BAT analysis of the heaters (Source ID 034-036) for CO emissions. A similar facility recently guaranteed a CO emission rate of 49 ppm for the heaters. Please note that the standards in PADEP's GP-1 permit which is 130 ppm CO at 3% O₂ 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 CO emission reduction.

- *The heater specification sheets (in the attached revised application) indicate an exhaust limit of 50 ppm. Since this aligns closely with the performance of similar units at the other facility, it meets the BAT requirements.. See attached for the spec sheet.*

Let me know if you have any questions or would like to schedule a meeting to discuss any of these topics. Again, please provide a response to these questions by December 16th.

Thank you,

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