

## Permit Alteration Source Analysis & Technical Review

Company	<b>Magellan Terminals Holdings, L.P.</b>	Permit Number	<b>4850</b>
City	<b>Galena Park</b>	Project Number	<b>168478</b>
County	<b>Harris</b>	Account Number	<b>HG-0017-W</b>
Project Type	<b>Revision</b>	Regulated Entity Number	<b>RN102180486</b>
Project Reviewer	<b>Mr. Rick Goertz</b>	Customer Reference	<b>CN600134639</b>

  

Site Name	<b>Galena Park Terminal</b>
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### Project Overview

Magellan Terminals Holdings L.P. owns and operates a bulk storage terminal located in Galena Park, Harris County, Texas.

Magellan has submitted a permit alteration requesting the following:

- 1) Specify an averaging period in the temperature monitoring requirement for the marine loading vapor combustors (EPNs WESTMVCS & EASTMVCS) in Special Condition 8.
- 2) Revise Special Conditions 16, 24, and 26 and the MAERT to properly represent that the tank vapor combustor EPN TKFLARE is better described as a vapor combustor rather than a flare.
- 3) Reduce short term emission rates for the tank vapor combustor to better reflect actual emissions.
- 4) Correct a typographical error in the "Tanks Category" list in the MAERT in which tanks 510 and 511 appear on the same line when each tank should be noted on a separate line.

### Review Summary

In order to approve the permit changes in request number 1, all conditions for the marine loading vapor combustors (EPNs WESTMVCS & EASTMVCS) were updated to reflect current boilerplate conditions.

Requested changes identified in request 2 were made in the permit since conditions in the permit are for a vapor combustor rather than a flare. Requested changes are actually comprised of updating the name of the EPN from TKFLARE to TKVCU.

#### Permit Changes

##### MAERT

- 1) The name of EPN TKFLARE was changed to TKVCU. The EPN name was updated to TANK ROOF LANDING VCU.
- 2) Reduce EPN TKVCU short term emission rates for VOC, NOx, and CO from 246.22 lb/hr, 34.05 lb/hr, and 67.97 lb/hr to 126.10 lb/hr, 17.47 lb/hr, and 34.88 lb/hr respectively.
- 3) In the "Emission Point Categories" attachment, a separate line was created for tanks 510 and 511.

#### Special Condition Changes:

Current Permit	Proposed Permit	Change
1-7	1-7	No Change
-	8	Condition was updated to include reference to the stack testing requirement of special condition 26 and to indicate that temperatures were based on a six minute average.
9-15	9-15	No Change
16	16	Update name of EPN TKFLARE to TKVCU
17-23	17-23	No Change
24-25	24	Conditions were updated to reflect current boilerplate language for vapor combustors and update the name of EPN TKFLARE to TKVCU. The provision in paragraph 3 requiring quality-assured (or valid) data be generated when the VCU is operating except during the performance of a daily zero and span check was removed since

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-	25	the applicant is using a thermocouple to monitor temperature.
26	26	Added provision to alter set point temperature based on results of stack testing.
		Update name of EPN TKFLARE to TKVCU

**Impacts Evaluation - 30 TAC 116.111(a)(2)(J)**

Was modeling conducted?	<b>No</b>	Type of Modeling:	<b>N/A</b>
Will GLC of any air contaminant cause violation of NAAQS?			<b>No</b>
Is this a sensitive location with respect to nuisance?			<b>No</b>
[§116.111(a)(2)(A)(ii)] Is the site within 3000 feet of any school?			<b>No</b>
Additional site/land use information: None			

**Permit Concurrence and Related Authorization Actions**

Is the applicant in agreement with special conditions?	<b>Yes</b>
Company representative(s):	<b>Teri Holmes</b>
Contacted Via:	<b>Email</b>
Date of contact:	<b>September 9, 2011</b>
Other permit(s) or permits by rule affected by this action:	<b>None</b>
List permit and/or PBR number(s) and actions required or taken:	<b>N/A</b>

Project Reviewer	Date	Team Leader/Section Manager/Backup	Date
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