

DiSorbo

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November 14, 2018



Mr. Johnny Bowers
Texas Commission on Environmental Quality
Air Permits Initial Review Team-MC161
12100 Park 35 Circle
Austin, TX, 78753

Re: New Source Review Permit Application
Axis Midstream Holdings, LLC
Harbor Island Marine Terminal
Aransas Pass, Nueces County

Dear Mr. Bowers:

On behalf of Axis Midstream Holdings, LLC (Axis), DiSorbo Consulting, LLC is submitting the enclosed permit application to authorize the construction and operated a marine terminal capable of loading crude oil and/or crude oil condensates onto ocean going ships/barges and inland barges via two loading berths near Aransas Pass, Texas.

Axis requests this application to be reviewed via the expedited permitting process as the facilities included in this application will benefit the economy by providing economic opportunities to both third party contractors and the local communities near the Aransas Pass, TX. If you have any questions or require additional information, please feel free to contact me at (713) 955-1221 or Mr. David Odell of Axis at 713-623-2412.

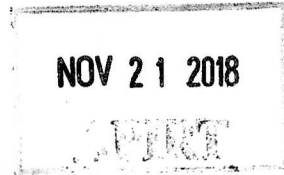
Sincerely,

DiSorbo Consulting, LLC

Neal A. Nygaard
Chief Operating Officer, Principal

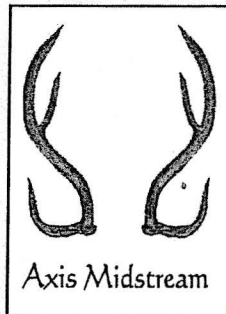
Enclosures

cc: Ms. Kelly Ruble, Air Section Manager, TCEQ Region 14, Corpus Christi, TX



AIR PERMITS DIVISION
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New Source Review Permit Application Texas Commission on Environmental Quality



Axis Midstream Holdings, LLC
Aransas Pass, Nueces County, Texas

November 2018



Shanon G. DiSorbo, P.E.

DiSorbo Consulting, LLC

TBPE# 15665



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Appendices

Appendix A Routine Emission Calculation Details

Appendix B MSS Emission Calculation Details

Section 2 contains the TCEQ Core Data Form, TCEQ Form APD-EXP, TCEQ form PI-1 and Table 30; as well as a copy of the fee check.

Section 3 contains an Area Map showing the site location.

Section 4 contains a process description of the sources associated with this permit application for the proposed Harbor Island Marine Terminal.

Section 5 contains a discussion of the estimated emissions from the facilities included in this application.

Section 6 presents the BACT analysis for the facilities included in this application.

Section 7 addresses applicability of the federal Nonattainment New Source Review (NNSR) and Prevention of Significant Deterioration (PSD) permitting requirements.

Section 8 presents the General Application Requirements that address the applicability of state and federal air regulations.

Appendix A contains the detailed routine emission calculations for the facilities included in this application (Contains Confidential Information).

Appendix B contains detailed emission calculations for maintenance, startup, and shutdown (MSS) activities (Contains Confidential Information).

Table 1-1
 Federal NSR Applicability Analysis Summary
 Axis Midstream Holdings, LLC
 Harbor Island Marine Terminal
 November 2018

EPN	Facility Description	Federal NSR Classification	VOC		
			Baseline	Proposed	Project Increase
			tpy	tpy	tpy
BERTHCAP	Berth Loading Fugitives Emissions Cap	New	-	52.80	52.80
MVCU-1 - MVCU-8	Controlled Loading Annual Emissions Cap	New	-	97.19	97.19
50-1	Recycle Tank No. 1	New	-	1.60	1.60
50-2	Recycle Tank No. 2	New	-	1.60	1.60
T-COMB-1	Temporary Portable Combustion Unit	New	-	0.24	0.24
MSS	MSS Emissions Cap	New	-	0.53	0.53
FUG	Piping Fugitive Components	New	-	3.40	3.40
Project Increase (tpy)					157.36
Major Source Threshold (tpy)					250
Existing Major Source (Yes/No)					No
Project Major Source By Itself (Yes/No)					No
Federal Review Required (Yes/No)					No

NOx			CO			SO2		
Baseline	Proposed	Project Increase	Baseline	Proposed	Project Increase	Baseline	Proposed	Project Increase
tpy	tpy	tpy	tpy	tpy	tpy	tpy	tpy	tpy
-	-	-	-	-	-	-	-	-
-	118.06	118.06	-	236.12	236.12	-	90.48	90.48
-	-	-	-	-	-	-	-	-
-	5.57	5.57	-	7.42	7.42	-	0.06	0.06
-	0.63	0.63	-	0.84	0.84	-	0.02	0.02
-	-	-	-	-	-	-	-	-
		124.26			244.39			90.56
		250			250			250
		No			No			No
		No			No			No
		No			No			No

Table 1-1
 Federal NSR Applicability Analysis Summary
 Axis Midstream Holdings, LLC
 Harbor Island Marine Terminal
 November 2018

EPN	Facility Description	Federal NSR Classification	H2S		
			Baseline	Proposed	Project Increase
			tpy	tpy	tpy
BERTHCAP	Berth Loading Fugitives Emissions Cap	New	-	-	-
MVCU-1 - MVCU-8	Controlled Loading Annual Emissions Cap	New	-	0.96	0.96
50-1	Recycle Tank No. 1	New	-	-	-
50-2	Recycle Tank No. 2	New	-	-	-
T-COMB-1	Temporary Portable Combustion Unit	New	-	0.00	0.00
MSS	MSS Emissions Cap	New	-	0.03	0.03
FUG	Piping Fugitive Components	New	-	0.00	0.00
Project Increase (tpy)					1.00
Major Source Threshold (tpy)					250
Existing Major Source (Yes/No)					No
Project Major Source By Itself (Yes/No)					No
Federal Review Required (Yes/No)					No

PM/PM10/PM2.5			CO2e		
Baseline	Proposed	Project Increase	Baseline	Proposed	Project Increase
tpy	tpy	tpy	tpy	tpy	tpy
-	-	-	-	-	-
-	8.80	8.80	-	174,983.94	174,983.94
-	-	-	-	-	-
-	0.28	0.28	-	2,608	2,608
-	0.78	0.78	-	1,607.65	1,607.65
-	-	-	-	-	-
		9.85			179,199
		250			75,000
		No			No
		No			No
		No			No

Table 1-2
Emissions Summary
Axis Midstream Holdings, LLC
Harbor Island Marine Terminal
November 2018

EPN	FIN	Name	VOC		NO _x		CO		PM/PM ₁₀ /PM _{2.5}		H ₂ S		SO ₂		CO ₂ e ¹
			lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	tpy
BERTH-1	BERTH-1	Berth 1 Loading Fugitives	9.05	-	-	-	-	-	-	-	0.01	-	-	-	-
BERTH-2	BERTH-2	Berth 2 Loading Fugitives	9.05	-	-	-	-	-	-	-	0.01	-	-	-	-
BERTHCAP	BERTHCAP	Berth Loading Fugitives Emissions Cap	-	52.80	-	-	-	-	-	-	-	0.03	-	-	-
MVCU-1	MVCU-1	Controlled Loading Marine VCU No.1	12.53	-	12.53	-	25.05	-	0.93	-	6.14	-	11.79	-	-
MVCU-2	MVCU-2	Controlled Loading Marine VCU No.2	12.53	-	12.53	-	25.05	-	0.93	-	6.14	-	11.79	-	-
MVCU-3	MVCU-3	Controlled Loading Marine VCU No.3	12.53	-	12.53	-	25.05	-	0.93	-	6.14	-	11.79	-	-
MVCU-4	MVCU-4	Controlled Loading Marine VCU No.4	12.53	-	12.53	-	25.05	-	0.93	-	6.14	-	11.79	-	-
MVCU-5	MVCU-5	Controlled Loading Marine VCU No.5	12.53	-	12.53	-	25.05	-	0.93	-	6.14	-	11.79	-	-
MVCU-6	MVCU-6	Controlled Loading Marine VCU No.6	12.53	-	12.53	-	25.05	-	0.93	-	6.14	-	11.79	-	-
MVCU-7	MVCU-7	Controlled Loading Marine VCU No.7	12.53	-	12.53	-	25.05	-	0.93	-	6.14	-	11.79	-	-
MVCU-8	MVCU-8	Controlled Loading Marine VCU No.8	12.53	-	12.53	-	25.05	-	0.93	-	6.14	-	11.79	-	-
MVCU-1 - MVCU-8	MVCU-1 - MVCU-8	Controlled Loading Annual Emissions Cap	-	97.19	-	118.06	-	236.12	-	8.80	-	0.96	-	90.48	174,984
50-1	50-1	Recycle Tank No. 1	5.14	1.60	-	-	-	-	-	-	-	-	-	-	-
50-2	50-2	Recycle Tank No. 2	5.14	1.60	-	-	-	-	-	-	-	-	-	-	-
T-COMB-1	T-COMB-1	Temporary Portable Combustion Unit	2.00	0.24	3.00	5.57	4.00	7.42	0.15	0.28	0.02	0.00	1.88	0.06	2,608
MSS	MSS	MSS Emissions Cap	117.29	0.53	1.99	0.63	2.66	0.84	0.25	0.78	0.10	0.03	0.06	0.02	1,608
FUG	FUG	Piping Fugitive Components	0.78	3.40	-	-	-	-	-	-	0.00	0.00	-	-	-
Total Emission Rates:			-	157.36	-	124.26	-	244.39	-	9.85	-	1.02	-	90.56	179,199