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Document Control Sheet

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|---------------------|--------------------------------|
| Sheet Title:        | AIR NSR - RLM                  |
| Box ID:             | 8619                           |
| Control Sheet ID:   | 0000-0000-0026-8620            |
| Record Series Name: | AIR / New Source Review Permit |
| Record Series:      | AIR NSR                        |
| Primary ID:         | 154527                         |
| Secondary ID:       | 293436                         |
| Doc Type:           | Permits                        |
| Security:           | Public                         |
| Date:               | 12/17/2018 12:00AM             |
| Title:              | Investigation                  |
| Tertiary ID         | 1532775                        |

AIR NSR\_154527-293436\_PA\_20181217\_INVESTIGATION\_1532775\_.PDF  
**Texas Commission on Environmental Quality**  
**Investigation Report**

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**Customer: Axis Midstream Holdings, LLC**  
**Customer Number: CN605596816**

**Regulated Entity Name: HARBOR ISLAND MARINE TERMINAL**

**Regulated Entity Number: RN110575685**

**Investigation #** 1532775  
**Investigator:** CRYSTAL CHALOUPKA  
**Conducted:** 12/17/2018 -- 12/17/2018  
**Program(s):** AIR NEW SOURCE PERMITS

**Incident Numbers**  
**Site Classification** CASE-BY-CASE  
**NAIC Code:** 486110  
**SIC Code:** 4612

**Investigation Type:** Site Assessment

**Location:** APPROXIMATELY 1.0 MI NW OF HWY  
 361 FERRY LANDING

**Additional ID(s):** 154527

**Address:** ,  
 , ,

**Local Unit:** REGION 14 - CORPUS CHRISTI  
**Activity Type(s):** PMSI116ON - AIR PMSI116ON - ON  
 SITE CH 116 PERMIT SITE REVIEW

**Principal(s):**

| Role       | Name                        |
|------------|-----------------------------|
| RESPONDENT | AXIS MIDSTREAM HOLDINGS LLC |

**Contact(s):**

| Role                           | Title                                    | Name              | Phone                 |
|--------------------------------|--|-------------------|-----------------------|
| PARTICIPATED<br>IN             | ENERGY AIR PERMITS<br>ENGINEER           | MS Colleen KRENEK | Office (512) 239-1309 |
| REGULATED<br>ENTITY<br>CONTACT | VICE PRESIDENT<br>PIPELINE<br>OPERATIONS | MR DAVID ODELL    | Office (713) 623-2412 |
| REGULATED<br>ENTITY<br>CONTACT | PIPELINE FIELD<br>SPECIALIST             | MR MARTIN HARPER  | Cell (210) 863-9300   |
| REGULATED<br>ENTITY<br>CONTACT | TECHNICAL<br>CONSULTANT                  | MR NEAL NYGAARD   | Phone (713) 995-1221  |

**Other Staff Member(s):**

| Role         | Name            |
|--------------|-----------------|
| Supervisor   | GUADALUPE LOPEZ |
| Investigator | JOHN PEARCE     |
| Supervisor   | KELLY RUBLE     |
| QA Reviewer  | ASHLEY FUQUA    |

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### Associated Check List

Checklist Name

AIR PERMIT SITE REVIEW

Unit Name

1532775

Investigation Comments:

INTRODUCTION

Introduction

On November 21, 2018, Axis Midstream Holdings, LLC (Axis) submitted a permit application for the construction of Harbor Island Marine Terminal (HIMT) under Texas Commission on Environmental Quality (TCEQ) New Source Review (NSR) Permit No. 154527. HIMT is located approximately 1.0 mile northwest of Highway 361 Ferry Landing, Port Aransas, Nueces County, Texas.

A response to a Request for Comments (RFC) Site Review (SR) for the permit activity (Project No. 293436) was requested of the TCEQ Region 14 (R14) Office in Corpus Christi by the TCEQ Air Permits Division (APD) on December 4, 2018, with a response deadline of December 25, 2018. Ms. Colleen Krenek, Energy Air Permits Engineer, was the TCEQ APD contact for the project. The RFC SR was assigned to Air Section Environmental Investigator (EI) for the TCEQ R14 Office, Ms. Crystal Chaloupka, on December 7, 2018. An On Site Chapter 116 Permit Site Review (PMSI116ON) investigation was conducted to describe the characteristics of the site and its location relative to its adjacent receptors based on site information provided in the permit application.

HIMT's contacts were Mr. David Odell – Vice President Pipeline Operations, Mr. Neal Nygaard – Technical Consultant/Professional Engineer, and Mr. Martin Harper - Pipeline Field Specialist.

Daily Narrative

On December 12, 2018, the EI initiated the PMSI116ON investigation. The PMSI116ON included an in-house review of the permit renewal application, compliance history, and the areas surrounding the site, including relevant distance measurements. The application was missing a plot plan for the site. The EI contacted Mr. Nygaard to request a copy of the site's plot plan.

On December 13, 2018, the EI contacted Mr. Odell to inform him of the onsite visit for December 17, 2018.

On December 17, 2018, the EI and TCEQ R14 Air Section EI, Mr. John Pearce, hereby known as the Investigative Team, visited HIMT and met with Mr. Harper. The Investigative Team observed the site, marked where emission points were going to be constructed, and noted surrounding receptors. The RFC SR response for Permit No. 154527/Project No. 293436 was submitted via email to Ms. Krenek. See Attachment 1 for the RFC SR submittal.

Exit Interview

Since non-compliance issues were not evaluated during the PMSI116ON investigation, the Exit Interview Protocol was not utilized.

GENERAL FACILITY AND PROCESS INFORMATION

Process Description

HIMT will be 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. Vapors associated with the loading of crude oil and/or crude oil condensates will be collected and routed to a vapor control system which consists of eight vapor combustion units (VCUs). In addition, a storage tank will be utilized for pipeline relief and/or the storage of residual crude and/or crude oil condensate associated with loading operations. A complete process description can be viewed in the TCEQ R14 Office files.

BACKGROUND

Performance Classification and Compliance History Rating

**HARBOR ISLAND MARINE TERMINAL - PORT ARANSAS**

12/17/2018 Inv. # - 1532775

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Axis Midstream Holdings, LLC (CN605596816)  
Classification: NOT APPLICABLE  
Rating: ---

Harbor Island Marine Terminal (RN110575685)  
Classification: NOT APPLICABLE  
Rating: ---

Note: 30 TAC §60.2 - Compliance History Classification (Point Ranges):  
High Performer (above-satisfactory compliance record) = fewer than 0.10 points;  
Satisfactory Performer (generally complies with environmental regulations) = 0.10 to 55 points;  
Unsatisfactory Performer (performs below minimal acceptable performance standards established by the commission) = more than 55 points

Agreed Orders, Court Orders, and Other Compliance Agreements

HIMT is not presently subject to any Agreed Orders, Court Orders, and/or Other Compliance Agreements.

Prior Enforcement Action

HIMT has not had any enforcement issues in the past five years.

Complaints

HIMT has not been the subject of any air-related complaints registered with the TCEQ R14 Office in the past two years.

**ADDITIONAL INFORMATION**

Conclusions, Recommendations, and Current Enforcement Issues

TCEQ R14 has no objections to proceed with HIMT's construction permit application for NSR Permit No. 154527/Project No. 293436 as long as HIMT operates in accordance with state and federal regulations.

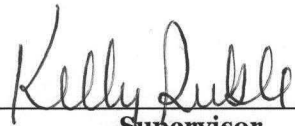
**ATTACHMENTS**

- 1. RFC SR Submittal

**No Violations Associated to this Investigation**

Signed   
\_\_\_\_\_  
Environmental Investigator

Date 1/7/19

Signed   
\_\_\_\_\_  
Supervisor

Date 1/10/19

**Attachments: (in order of final report submittal)**

- Enforcement Action Request (EAR)
- Letter to Facility (specify type) : \_\_\_\_\_
- Investigation Report
- Sample Analysis Results
- Manifests
- Notice of Registration

- Maps, Plans, Sketches
- Photographs
- Correspondence from the facility
- Other (specify) :

See Attachment List on  
Page 3 of 4



**ATTACHMENT 1**

**RFC SR Submittal**

Axis Midstream Holdings, LLC

Harbor Island Marine Terminal

RN110575685

Nueces County

Investigation No. 1532775

December 17, 2018

Attachment Total Pages = 4

## Crystal Chaloupka

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**From:** Crystal Chaloupka  
**Sent:** Monday, December 17, 2018 1:14 PM  
**To:** Colleen Krenek  
**Cc:** Sonny Lopez  
**Subject:** Site Review/Request for Comments for Project Number 293436  
**Attachments:** RFC-293436.docx

Good afternoon Ms. Krenek,

I have attached my completed comments on project number 293436 for the permit renewal of Permit No. 154527 concerning Axis Midstream Holdings, LLC, Harbor Island Marine Terminal (CN605596816, RN110575685). If you have any questions or concerns, please let me know.

Regards,

*Crystal Chaloupka*

Environmental Investigator - Air  
TCEQ Corpus Christi Region Office  
6300 Ocean Drive, Unit 5839, Suite 1200  
Corpus Christi, Texas 78412-5839  
(361) 825-3388

[Crystal.Chaloupka@tceq.texas.gov](mailto:Crystal.Chaloupka@tceq.texas.gov)



Request for Comments -- Site Review  
TCEQ -- Air Permits Division  
Phone: (512) 239-1250  
Fax: (512) 239-1300

Submitted by: Air Permits Initial Review Team

TO: Region: 14

City: Port Aransas

County: Nueces

Date Request Submitted: December 4, 2018

Date Response Requested: December 25, 2018

Comments: Deadline is 45 days for MSS-type reviews, 21 calendar days for all others, from the Date Request Submitted. Section Manager approval is required for responses requested sooner than those deadlines. MSS = an NSR application for Planned Maintenance, Start-up, or Shutdown emissions in accordance with 30 TAC Chapter 101.

Date Application Received by Air Permit Initial Review Team: November 21, 2018

REGIONAL OFFICES: Please return comments to the appropriate Permitting Team Leader indicated on the following page ASAP, but no later than deadline established above. Permit disposition will proceed after comments are received or after the comments deadline has passed.

REQUESTED PERMIT ACTION:

MSS Construction

MSS Amendment

Revision

X Construction

Amendment

Other

Renewal

Renewal Abbreviated Review

Project No.: 293436

PERMIT No.: 154527

Regulated Entity No.: RN110575685

Customer No.: CN605596816

Company Name: Axis Midstream Holdings, LLC

Plant Name: Harbor Island Marine Terminal

City: Port Aransas

County: Nueces

Location: approximately 1.0 mile Northwest of Highway 361 Ferry Landing

Unit Name: Harbor Island Marine Terminal

Technical Contact: Neal A. Nygaard

Phone: (713) 955-1221

Local Program Applicable?: Yes      X No      Local Programs:

Note: For sites in a region that has a local program with jurisdiction, MSS projects for those sites will be reviewed by regional offices only.

Investigation No. 1532775  
Attachment 1 / Page 2 of 4



**Request for Comments -- Site Review  
RESPONSE**

**PLEASE SEND COMMENTS TO THE PERSON IDENTIFIED BELOW. (To avoid delays, please do not send this back to the Air Permits Initial Review Team.):**

|   |   |                                 |  |
|---|---|---------------------------------|--|
|   | To: Bonnie Evridge - Air Permits Division – Austin (MAC) (M/A)    | E-Mail: <u>Bonnie Evridge</u>   | Phone: (512) 239-5222                        |
|   | To: Ann Mosher - Air Permits Division – Austin (Coatings) (M/C)   | E-Mail: <u>Ann Mosher</u>       | Phone: (512) 239-3753                        |
|   | To: Marc Sturdivant - Air Permits Division - Austin (Comb) (Comb) | E-Mail : <u>Marc Sturdivant</u> | Phone: (512) 239-1313                        |
|   | To: Tom Lawshae - Air Permits Division - Austin (Chem) (Coat)     | E-Mail : <u>Tom Lawshae</u>     | Phone: (512) 239-2048                        |
| X | To: Colleen Krenek - Air Permits Division - Austin (Energy)       | E-Mail : <u>Colleen Krenek</u>  | Phone: (512) 239-1309                        |
|   | To: Rule Registration Section                                     | E-Mail: <u>AirRR</u>            | Phone: (512) 239-1250<br>Fax: (512) 239-2101 |
|   | To:   | E-Mail:                         | Phone:<br>Fax:(512) 239-1300                 |

FROM: Region: 14                      City: Port Aransas                      County: Nueces

Compliance:                      Legal:

Copy of Application Received by your Office:  YES  NO

Date Received: **12/10/2018**

PERMIT No. **154527**                      PROJECT No. **293436**

Company Name: **Axis Midstream Holdings, LLC**

Investigator's/Compliance Officer's Name (Please Print): **Crystal Chaloupka**

Organization: **TCEQ R14**                      Phone: **361-825-3388**

Comments Deadline: **12/25/2018**

Date of Last Site Visit: **12/17/2018**

**SITE INFORMATION:**

Nuisance/Odor Potential:  Low  Moderate  High

Existing Odor Problem:  Yes  No (If yes, provide details)

Hazard Potential:  Low  Moderate  High

Surrounding Land Use: **Vacant/Industrial**

School within 3,000 feet?  Yes  No      Distance (feet):      School Name:

Distance to Nearest Off-Property Receptor: **~2030 ft. from Gulf Copper Harbor Island building to Property line**

Receptor Type:                      **Industrial**

Distance from unit to nearest property line: **~90 ft from proposed Tank site to property line**

Describe area surrounding the site (agriculture, industrial, residential):                      **Vacant/Undeveloped**

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Attachment 1 / Page 3 of 4

|   |             |
|---|-------------|
| <b>NOV/NOE INFORMATION</b> (concerning affected process unit):  |             |
| Type of Site: <input checked="" type="checkbox"/> New <input type="checkbox"/> Existing   |             |
| NOV Issued? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes   | Date:       |
| Type of Violation:  |             |
| Was there an NOE for this site?: <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes  | Date:       |
| Please provide any information the permit engineer needs concerning the current NOV, violation, or NOE status   |             |
| Summarize any recent complaints related to this facility including complaint type and CCEDS number:   | <b>None</b> |
| Recommendation based on Compliance History: (*For Compliance Use Only)  |             |
| Proceed with Permit Review <input checked="" type="checkbox"/> Additional Provisions <input type="checkbox"/> Deny Permit <input type="checkbox"/> Update Application <input type="checkbox"/>    |             |
| <b>SITE REVIEW:</b>   |             |
| In light of the proximity of sensitive receptors and the surrounding land use, please discuss any concerns you have concerning a facility of this type locating at the proposed site. <b>None</b> |             |
| <b>MSS Specific Notes:</b>  |             |
| The following MSS activities in the application are insufficient or inconsistent with our knowledge of MSS at the facility, and why:  |             |
| The following activities are typically considered planned MSS and are not found in the application. These activities should be added or addressed:  |             |

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Attachment 1 /Page 4 of 4