



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 6  
1201 ELM STREET, SUITE 500  
DALLAS, TEXAS 75270

July 31, 2019

Mr. David Farris  
Bluewater Texas Terminal  
2331 CityWest Blvd.  
Houston, TX 77042

RE: Title V Application Incompleteness Determination for the Bluewater Texas Terminal LLC

Dear Mr. Farris:

The United States Environmental Protection Agency (EPA) has completed a review of your title V operating permit application for the Bluewater Texas Terminal (BWTT) received on May 31, 2019. We have determined that your application is incomplete as submitted. We have enclosed review comments that will need to be addressed in order for EPA to continue to process your title V permit application. Please notify us if your response/supplemental submittal is not possible by September 1, 2019.

Upon receipt of your supplemental information, we will continue our completeness review and will issue a completeness determination based upon our evaluation of all information provided for your permit application at that time. The information specified in our Enclosure is necessary for EPA to develop a Statement of Basis and provide a rationale for the terms and conditions for a draft title V operating permit. As we continue our review, it may be necessary for EPA to request further clarifying or supporting information. If any supplemental information substantially changes the original scope of the permit application, an amendment or new application may be required.

If you have any questions concerning our questions or the information we are requesting, please feel free to contact myself at (214) 665-6435 or Aimee Wilson of my staff at (214) 665-7596.

Sincerely,

7/31/2019

**X** Jeff Robinson

---

Jeff Robinson  
Branch Chief Air Permits, Monitoring & Gra...  
Signed by: JEFFERY ROBINSON

Enclosure

## **ENCLOSURE**

### **EPA Region 6 Title V Application Completeness Review Comments** *Bluewater Texas Terminal LLC (BWTT)*

The information in the application appears to mirror the Bluewater Texas Terminal LLC (BWTT) Prevention of Significant Deterioration (PSD) application. Of special note, as the PSD application has been determined to be incomplete, much of the same information requested to make the PSD application complete will also be needed in order for the title V application to be considered complete.

1. Please provide information on fugitive emissions as they should be included in the permit application in accordance with 40 CFR § 71.3(d).
2. For the permitting record, please provide additional information to clarify how BWTT intends to verify that the noncompany owned, foreign flagship marine tank vessels loaded at BWTT are tested annually for a vapor tightness test in accordance with 40 CFR § 63.565(c).