



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 6**  
**1201 ELM STREET, SUITE 500**  
**DALLAS, TEXAS 75270-2102**

September 18, 2020

VIA EMAIL: [csanfilippo@txpetinv.com](mailto:csanfilippo@txpetinv.com)

Mr. Chris Sanfilippo  
Texas Petroleum Investment Company - West White Lake 540-B Facility  
101 La Rue France Ste. 406  
Lafayette, Louisiana 70508

RE: Emission Inventory Permit Consistency Review  
Texas Petroleum Investment Company - West White Lake 540-B Facility (AI# 33252)

Dear Mr. Sanfilippo:

The U.S. Environmental Protection Agency (EPA) Region 6 is working with the Louisiana Department of Environmental Quality (LDEQ) and has reviewed your facility's emission inventory for criteria pollutant and hazardous air pollutant (HAP) emission totals, as reported to LDEQ. Based upon this review, EPA has determined that your reported emissions for some Emission Points exceeded your permit authorization limits. EPA had also reviewed your Title V reports for 2018 and did not find that these permit exceedances were reported.

A detail by Emission Point of the differences between the reported emissions and permitted limits is included in the attachment to this letter. EPA is providing you the opportunity to clarify or explain these differences, especially if any of the following conditions are present:

- Sources and associated emissions included in the emission inventories that are not represented in permits (e.g. de minimis sources);
- Criteria pollutants or individual HAPs reported in the facility's emission inventories that are not represented in LDEQ permits or authorizations;
- Reported or unreported upset or other excess emission events (e.g. startup/shutdown).

If Texas Petroleum Investment Company is interested in discussing or providing information about this matter, you have ten (10) working days from receipt of this letter to inform EPA by e-mail by contacting:

Jack Telleck  
Enforcement Officer (ECDAT)  
Air Toxics Enforcement Section  
email: [telleck.jack@epa.gov](mailto:telleck.jack@epa.gov)

Subsequent to the above-referenced due date, Jack Telleck will arrange to meet with Texas Petroleum Investment Company via conference call. At that time, Texas Petroleum Investment Company may provide additional information to address the potential violations and present evidence that contravenes EPA's evidence. The primary goal is to ensure compliance with the applicable environmental laws and regulations; however, settlements will be available where appropriate.

The EPA acknowledges that the COVID-19 pandemic may impact your business. If that is the case, please contact us regarding any specific issues you need to discuss.

Please direct questions to Jack Telleck of the Air Enforcement Branch at 214-665-9732 or at [telleck.jack@epa.gov](mailto:telleck.jack@epa.gov). Thank you for your attention to this matter.

Sincerely,

STEVEN  
THOMPSON

Digitally signed by STEVEN THOMPSON  
DN: c=US, o=U.S. Government, ou=Environmental  
Protection Agency, cn=STEVEN THOMPSON,  
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Date: 2020.09.18 13:30:30 -05'00'

Steve Thompson  
Chief  
Air Enforcement Branch

Attachment

ECC: Celena Cage, Louisiana Department of Environmental Quality, [celena.cage@la.gov](mailto:celena.cage@la.gov)

**Attachment A****Texas Petroleum Investment Company - West White Lake 540-B Facility**

| AI #  | Facility Name                  | Permit        | Subject Item   | Subject Item Type          | Subject Item Desc                | Emission Type | Parameter Desc  | Permitted Limit (tpy) | ERIC Reported Emissions (tpy) | Reported Emissions Over Permitted Limit (tpy) |
|-------|--------------------------------|---------------|----------------|----------------------------|----------------------------------|---------------|-----------------|-----------------------|-------------------------------|-----------------------------------------------|
| 33252 | West White Lake 540-B Facility | 2940-00100-V4 | EQT00000000008 | Internal combustion engine | Waukesha F1197G; Backup SWD Pump | Routine       | Carbon monoxide | 10.53                 | 15.48                         | 4.95                                          |
| 33252 | West White Lake 540-B Facility | 2940-00100-V4 | EQT00000000008 | Internal combustion engine | Waukesha F1197G; Backup SWD Pump | Routine       | Nitrogen oxides | 6.26                  | 15.48                         | 9.22                                          |