



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

September 22, 2020

VIA EMAIL: csanfilippo@txpetinv.com

Mr. Chris Sanfilippo
Texas Petroleum Investment Company - Bayou Sale Production Facility
101 La Rue France Ste. 406
Lafayette, Louisiana 70508

RE: Emission Inventory Permit Consistency Review
Texas Petroleum Investment Company - Bayou Sale Production Facility (AI# 16846)

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

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. Thank you for your attention to this matter.

Sincerely,

STEVEN
THOMPSON

Steve Thompson
Chief
Air Enforcement Branch

 Digitally signed by STEVEN THOMPSON
DN: c=US, o=U.S. Government, ou=Environmental
Protection Agency, cn=STEVEN THOMPSON,
0.9.2342.19200300.100.1.1=68001003652657
Date: 2020.09.22 15:27:33 -0500

Attachment

ECC: Celena Cage, Louisiana Department of Environmental Quality, celena.cage@la.gov

Attachment A**TPIC - Bayou Sale Production Facility - Bayou Sale Field**

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)
16846	Texas Petroleum Investment Company - Bayou Sale Production Facility	2660-00067-V5	EQT00000000020	Internal combustion engine	24, Compressor Engine 5A	Routine	CO	24.47	152.249	127.77
16846	Texas Petroleum Investment Company - Bayou Sale Production Facility	2660-00067-V5	EQT00000000020	Internal combustion engine	24, Compressor Engine 5A	Routine	NOx	30.95	90.4492	59.49