

Permit Alteration Source Analysis & Technical Review

Company	Element Fuels Holdings, LLC	Permit Number	147681
City	Brownsville	Project Number	378988
County	Cameron	Regulated Entity Number	RN107928129
Project Type	Revision	Customer Reference Number	CN606221372
Project Reviewer	Jamahd Dias		
Site Name	Centurion Brownsville		

Project Overview

Pursuant to 30 Texas Administrative Code 116.120(b), Element Fuels Holding, LLC has requested a second 18-month extension to begin construction of their facility authorized in NSR permit 147681 on October 19, 2021. Under the initial approval in permit 147681 project 271725, the deadline to begin construction was April 19, 2023, i.e., the initial construction deadline was April 19, 2023, and the first start of construction extension request extended the start of construction deadline to October 19, 2024 (project 346900 issued on October 7, 2022). The current permit action will be the second 18-month extension, which will extend the deadline for start of construction to April 19, 2026.

Element Fuels has provided in the submittal dated August 28, 2024, evidence that they have met the financial commitment required by 30 Texas Administrative Code 116.120(b)(2). In order to be granted an extension to the construction start date, 30 TAC 116.120(b) specifies that the permit holder must meet best available control technology (BACT). During the technical review of Project 271725, BACT was determined for the equipment authorized by this permit. The previously accepted BACT from project 271725 is still the most current Tier I BACT and has not changed for the applicant's current submittal in project 378988. As such, the units continue to meet BACT at the time of this review. It should be noted that emergency generators at this facility used Tier III BACT in Project 271725 complying with 40 CFR Part 89 Tier 2 specifications for engines. Fuel is limited to ultra-low sulfur diesel fuel (no more than 15 ppm sulfur by weight) and non-emergency operation is limited to 52 hrs/yr per unit. This continues to meet BACT standards for emergency engines.



10/3/2024

Project Reviewer
Jamahd Dias



10/4/2024

Team Leader
Matthew Ray

Date