

PUBLIC NOTICE

Texas GulfLink Deepwater Port

**ANNOUNCEMENT OF THE INITIAL COMBINED DRAFT FEDERAL MINOR SOURCE NEW
SOURCE REVIEW AND TITLE V FEDERAL OPERATING PERMIT**

PUBLIC COMMENT AND PUBLIC HEARING

Permit Number: R6NSRT5-DWP-GA9

Public Comment Period: May 22, 2025, to June 24, 2025

Public Notice Update: June 10, 2025

The EPA will hold the virtual public hearing, as originally announced, on June 24, 2025. Due to logistical reasons, we ask that those wishing to participate in the hearing register at the following website: <https://usepa.zoomgov.com/meeting/register/7MqnDZAJTQyQMp0CJBvJ7A>

When registering, please select your preferred language (English or Spanish) for use during the hearing. Live Spanish translation will be available during the hearing for those who register for the Spanish version. Once registered, the EPA will notify you how to join the virtual public hearing.

Those who registered to speak will generally be called upon to speak during the hearing in the order in which they registered. Public comments will continue to be accepted until the close of the comment period on June 24, 2025, as originally announced.

The United States Environmental Protection Agency (EPA) provides notice of and requests public comments on the draft Clean Air Act (CAA) permit for the proposed Texas GulfLink, LLC deepwater port (DWP) crude oil export terminal; specifically, a draft combined synthetic minor new source review (NSR) preconstruction and Part 71, title V federal operating permit. If finalized, the proposed CAA permit would authorize construction and regulate stationary air pollutant emissions associated with operation of the facility.

Texas GulfLink, LLC (TGL) proposes to construct and operate a DWP in federal waters approximately 26.6 nautical miles southeast of Freeport, Brazoria County, Texas. The port will consist of two single point mooring buoys and a central, manned platform that will provide crude oil loading service to fully and directly load Very Large Crude Carriers (VLCCs) and other oceangoing sized carriers for export to the global market. The DWP terminal's maximum loading rate will be 85,000 barrels per hour (bbl/hr) and maximum annual throughput will be 365,000,000 bbl/year.

One 42-inch outside diameter, 28.1-nautical-mile long crude oil pipeline would be constructed from the shoreline crossing in Brazoria County, Texas, to the TGL DWP for crude oil delivery. This pipeline would connect the proposed onshore Jones Creek Crude Oil Terminal (28° 59' 29.0976" North latitude, -95° 28' 20.6688" West longitude) to the offshore TGL platform. The TGL DWP offshore and marine components as described below.

Fixed Offshore Platform

One fixed offshore platform with piles will be located in Outer Continental Shelf Galveston Area Lease Block GA-423 in a water depth of approximately 104 feet. The platform will be located at

approximately 28° 33' 08.99" North latitude, 97.8° 01' 42.35" West longitude . The platform will have four decks comprised of personal living space, pipeline metering, a surge system, a pig receiving station, generators, lease automatic custody transfer unit, oil displacement prover loop, sample system, radar tower, electrical and instrumentation building, portal cranes, a hydraulic crane, an operations/traffic room, and helicopter deck.

Connections for Loading Crude Oil from the Platform to VLCC Tankers

The fixed offshore platform will be connected to VLCC tankers for loading by two separate 42-inch diameter departing pipelines. Each pipeline will depart the fixed offshore platform, carrying the crude oil to a Pipeline End Manifold (PLEM) in approximately 104 feet of water depth located 1.25 nautical miles from the fixed offshore platform. Each PLEM is then connected to a Single Point Mooring (SPM) Buoy through two 24-inch cargo hoses. Two 24-inch floating cargo hoses will connect each SPM Buoy to the VLCC (or other crude oil carrier type). SPM Buoy 1 is to be positioned in Outer Continental Shelf Galveston Area Lease Block GA-423 and SPM Buoy 2 is to be positioned in Outer Continental Shelf Galveston Area Lease Block GA-A36.

Offshore Support Vessel for DWP Loading Emissions Capture & Control

A dynamically positioned third-party Offshore Support Vessel (OSV) meeting the United States Coast Guard classification requirements of a gas carrier, remains within approximately 100 feet of the tanker ship moored at the deepwater port in preparation for loading and for the duration of the loading operation. The tanker ships being loaded with crude oil will be certified as having passed a leak tightness test within the 12 months prior to the loading operation at the port and will be evaluated for leaks during the loading operation while at the deepwater port. The emissions generated and displaced from the cargo hold of the tanker ship being loaded at the deepwater port are continuously routed via a closed vent system (99.49% capture efficiency) using a flexible transfer hose to the OSV for processing and control.

The OSV supplies the flexible hose that connects the vapor manifold onboard the tanker ship being loaded to the inlet vapor manifold of the OSV. The vapors are then routed and processed through a Vapor Processing Module (VPM). The output of the VPM includes slop related water and volatile organic compounds (VOCs), including methane, in either condensible or non-condensable form. Condensable VOCs are processed into liquid form (called L-VOCs) and are stored in pressure vessels onboard the OSV. All of the non-condensable emissions stream processed through the VPM (called surplus VOCs, or S-VOCs) is routed to gas turbines mounted on the OSV where it is used as fuel for the gas turbines and thus destroyed. Some of the stored L-VOCs is regasified and then routed through the gas turbines for use as supplemental fuel necessary to generate electricity for the VPM and other OSV use. However, most of the recovered L-VOCs remain stored in pressure vessels on the OSV until offloaded at a mainland port near Freeport. The overall capture and control efficiency of the tanker ship loading related VOC emissions at the DWP is over 97.6% as represented in the permit application.

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Proposed combined synthetic minor NSR and title V federal operating permit: EPA applies the provisions of the Deepwater Port Act (DPA), 33 U.S. Code (U.S.C.) § 1501, et seq, as the primary source of its authority to apply the CAA to activities associated with DWPs. In relevant part 33 U.S.C. §

1518(a)(1) extends the Constitution and law of the United States “to deepwater ports...and to activities connected, associated, or potentially interfering with the use or operation of any such port, in the same manner as if such port were an area of exclusive Federal jurisdiction located within a State.”

In addition, 33 U.S.C. § 1518(b) “federalizes” consistent laws of the adjacent state and directs that they be applied by federal officials. For this DWP permitting action, the nearest adjacent state is determined to be Texas. Thus, the laws of Texas apply to the proposed port, to the extent they are “applicable” and not inconsistent with federal law. The applicable state law includes Chapter 382 of the Texas Health and Safety Code (the Texas Clean Air Act), the federally approved State Implementation Plan (40 CFR 52 Subpart SS Texas), including but not limited to the approved provisions found in 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification, and 30 TAC Chapter 122, Federal Operating Permits Program. The source is also subject to permitting under the Federal Operating Permit Programs, 40 CFR Part 71. The source’s potential to emit (PTE), as proposed, will emit air contaminants for which ambient air quality standards have been established under title 1 of the CAA (criteria pollutants) and will emit some air contaminants which are also identified as hazardous air pollutants under Title II of the CAA (HAP). The location of the proposed DWP is in an area that is treated as attainment/unclassifiable as to air quality, and as such the source is not subject to federal nonattainment area new source review requirements for criteria pollutants.

In accordance with 30 TAC Chapter 116 the TGL DWP stationary source is subject to NSR preconstruction permitting requirements for non-major sources because the source’s PTE is above the source permitting threshold for minor sources and below the thresholds for the prevention of significant deterioration requirements for major sources of criteria pollutants under 40 CFR §52.21. Further, while the source, as proposed will emit HAPs, its PTE will be below the major source thresholds for HAPs and as such will not be subject to 40 CFR Part 63, National Emissions Standards for Hazardous Air Pollutants for Source Categories (MACT standards). The DWP is subject to the federal operating permit program under 40 CFR Part 71 because the PTE from the source as proposed will be above the threshold for one or more air contaminants. The estimated PTE in tons per year for the facility are as follows:

Texas GulfLink DWP Sitewide Emissions Potential to Emit

| Air Contaminant | Emissions (tpy) |
|-------------------|-----------------|
| PM ₁₀ | 6.37 |
| PM _{2.5} | 6.31 |
| SO ₂ | 0.51 |
| NO _x | 123.04 |
| CO | 76.73 |
| VOC | 244.75 |
| Any Single HAP | 7.64 |
| All HAPs Combined | 17.10 |

Notes for Table

Source-wide PTE includes emissions from the regulated emission units in tons per year (tpy).

NO_x – nitrogen oxide

VOC – volatile organic compounds (non-HAP)

SO₂ – sulfur dioxide

CO – carbon monoxide

HAP – hazardous air pollutants (mostly n-Hexane)

Permit Documents: Starting on May 22, 2025, members of the public may review EPA's administrative record for the TGL DWP synthetic minor NSR and title V operating permit action. The administrative record includes the proposed draft permit, the statement of basis for the proposed permit, the permit applications, and additional data and supporting documentation for the permit action.

Access to electronic copies of the documents:

Regulations.gov website: Navigate your web browser to <http://www.regulations.gov>. Once at the site, search and view the permit documents by entering the Docket ID No EPA-R06-OAR-2020-0413 into the search box. Follow the online instructions on how to access the documents.

Project electronic air quality modeling files may be found at EPA's website: <https://www.epa.gov/caa-permitting/air-permitting-deepwater-port-act-projects-south-central-region>

Access to physical copies of the documents:

Lake Jackson Branch Public Library: 250 Circle Way, Lake Jackson, TX 775; phone (979) 415-2590. Please call in advance to arrange viewing times.

EPA Region 6 Office: 1201 Elm Street, Suite 500, Dallas, Texas 75270; phone (214) 665-7258.

Monday – Friday, from 8:00 a.m. – 4:30 p.m., excluding Federal holidays. Please call in advance to arrange viewing times.

How to Comment: Any interested individual may submit written comments on EPA's draft proposed permit for the TGL DWP by accessing the regulations.gov website (listed above) and following the online instructions for posting a comment. All comments must be posted to the Regulations.gov website under docket **EPA-R06-OAR-2021-0413** by the end of the public comment period on June 24, 2025.

Each comment must be specific to the permit action. If you believe any condition of the proposed permit is inappropriate, you must raise reasonably ascertainable issues and submit all reasonably ascertainable arguments supporting your position by the close of the public comment period. Any supporting materials that you submit must be included in full and may not be incorporated by reference, unless they are already part of the administrative record for this permit proceeding or consist of State or Federal statutes and regulations, EPA documents of general availability, or other generally available reference materials.

EPA will consider and respond to all significant comments in making a final decision regarding the proposed permit action. Similar comments may be grouped together in EPA's response to comments document, although EPA will not respond to individual commenters directly. However, all comments will be included in the administrative record without change, and may be made available to the public, including any personal information provided, unless the comment includes Confidential Business Information (CBI) or other information whose disclosure is restricted by statute. Therefore, please clearly label CBI or other protected information as such. *Please note that an email or postal address must be provided with your comments if you wish to receive responses to comments submitted during the public comment period and direct notification of EPA's final decision regarding the proposed permit action.*

An extension of the 30-day comment period may be granted if a request for an extension adequately demonstrates why additional time is required to prepare comments.

Public Hearing: You have the right to request a public hearing on the proposed permit action. Any request for a public hearing must be received by EPA no later than June 4, 2025, and the request must state the nature of the issues proposed to be raised in the hearing for the permit action. Any request for a public hearing must be provided to EPA by posting a request on the Regulations.gov website listed

above under Docket ID **EPA-R06-OAR-2021-0413**. Please note attendance/participation at a public hearing is not required in order to submit written comments.

If EPA determines that there is significant public interest in the permit action, a ***virtual public hearing*** will be held on June 24, 2025. Due to the logistics involved in planning a virtual meeting, a pre-registration period will be necessary and will last from June 10, 2025 until June 24, 2025, the means by which one can sign up to request to speak at the public hearing will be included in the public notice as of June 10. For participants not able to pre-register, EPA will allow time for individuals attending and wanting to speak to participate, at the end of the meeting as participants indicate their interest to speak, and as time allows. *EPA will send verification by e-mail to all participants who pre-register to inform them of the order of speakers registered and approximate times for speakers to provide their verbal comments during the public hearing.*

If a public hearing is held, the public comment period shall automatically be extended to the close of the public hearing date. EPA retains the right to cancel the scheduled public hearing if no request for a public hearing is received by June 4, 2025, or if EPA determines that there is not a significant interest. If EPA decides to cancel the public hearing notification of the cancellation will be posted by June 10, 2025 on the Regulations.gov website listed above and also on EPA's website at <https://www.epa.gov/publicnotices>. Once at that page, select Texas in the 'find public notices by state' drop down box to find the public notice.

Final Determination: A final decision to issue or to deny a permit shall be made after all comments have been considered. Notice of the final decision shall be sent to each person who has submitted comments or requested notice of the final permit decision, provided the EPA has adequate contact information.