

US EPA ARCHIVE DOCUMENT

**Table A-1  
GHG Emission Summary  
Formosa Plastic Corporation, Texas  
2012 Expansion Project: Gas Turbines  
March 2014**

Source Name	Operating Scenario	EPN	Detailed Calculations in	GHG Mass Emissions (tpy)	CO <sub>2</sub> e (tpy)
Gas Turbine 1	Firing 100% Natural Gas	7K	Table A-2	463,071	463,540
Gas Turbine 2		7L		463,071	463,540
Duct Firing, Unit 1 [1]	Firing 100% Natural Gas	7K	Table A-3	61,449	61,511
	Firing 100% OL Tail Gas		Table A-4	53,041	53,103
	Firing 100% Hydrogen [2]		N/A	0	0
Duct Firing, Unit 2 [1]	Firing 100% Natural Gas	7L	Table A-3	61,449	61,511
	Firing 100% OL Tail Gas		Table A-4	53,041	53,103
	Firing 100% Hydrogen [2]		N/A	0	0
<b>Subtotal Total, Combined Cycle Units [3] =</b>				<b>1,049,040</b>	<b>1,050,103</b>
Turbine Startup, Fuel Line Maintenance [4]	Startup, Maintenance	7K-NGVENT, 7L-NGVENT	Table A-5	1.24	29.9
Fugitive Components [4]	N/A	NG-FUG	Table A-6	20.90	506.1
SF <sub>6</sub> Electrical Insulation [4]	N/A	SF6-FUG	Table A-7	<0.01	28.2
<b>Total =</b>				<b>1,049,062</b>	<b>1,050,667</b>

Notes:

[1] The duct burners may fire up to 100% heat input on any listed fuel or any combination thereof.

[2] Combustion of 100% hydrogen fuel stream in the duct burners does not result in any GHG emissions (carbon content is zero).

[3] Total GHG emissions are calculated as the maximum emissions from duct burner firing on any one of the three fuel types, plus

GHG emission contributions from the Gas turbines.

[4] FPC TX Requests that No Emission Limit be established for this source.

Compliance will be assured with the design/work practice standard as specified in the permit.

**Table A-2**  
**GHG Emission Calculations - Natural Gas Combustion - Gas Turbines**  
**Formosa Plastic Corporation, Texas**  
**2012 Expansion Project: Gas Turbines**  
**March 2014**

**GHG Emissions Contribution From Natural Gas Fired Combustion Turbines:**

EPN	Average Heat Input (MMBtu/hr)	Annual Heat Input (MMBtu/yr)	Pollutant	Emission Factor (kg/MMBtu) <sup>1</sup>	GHG Mass Emissions <sup>2</sup> (tpy)	Global Warming Potential <sup>3</sup>	CO <sub>2</sub> e (tpy)
7K	997	8,733,720	CO <sub>2</sub>	53.02	463,062	1	463,062
			CH <sub>4</sub>	1.0E-03	8.73	25	218.3
			N <sub>2</sub> O	1.0E-04	0.87	298	260.3
			<b>Totals</b>		<b>463,071</b>		<b>463,540</b>
7L	997	8,733,720	CO <sub>2</sub>	53.02	463,062	1	463,062
			CH <sub>4</sub>	1.0E-03	8.73	25	218.3
			N <sub>2</sub> O	1.0E-04	0.87	298	260.3
			<b>Totals</b>		<b>463,071</b>		<b>463,540</b>
<b>Total for 2 Turbines</b>					<b>926,143</b>		<b>927,081</b>

Notes:

1. CO<sub>2</sub> GHG factor from Table C-1 of 40 CFR 98 Mandatory Greenhouse Gas Reporting (GHG MRR).  
 CH<sub>4</sub> and N<sub>2</sub>O GHG factors based on Table C-2 of GHG MRR.
2. CO<sub>2</sub> emissions based on 40 CFR Part 98, Subpart C, Equation C-1.
3. Global Warming Potential factors based on Table A-1 of 40 CFR 98 Mandatory Greenhouse Gas Reporting.

Sample Calculation, CO<sub>2</sub>:

GHG Mass Emissions (metric ton/yr) = 0.001 x 8733720 (MMBtu/yr) x 53.02 kg/MMBtu = 463062  
 CO<sub>2</sub>e (metric ton/yr) = 463062 (tpy) x 1 = 463062

**Table A-3**  
**GHG Emission Calculations - Duct Burners Natural Gas Combustion**  
**Formosa Plastic Corporation, Texas**  
**2012 Expansion Project: Gas Turbines**  
**March 2014**

**GHG Emissions Contribution From Natural Gas Fired Combustion:**

GHG Emissions Contribution From Natural Gas Fired Combustion:					Emissions per Unit			
Source Type	Average Heat Input/Unit (MMBtu/hr)	Annual Avg Heat Input, Each Unit (MMBtu/yr)	Pollutant	Emission Factor (kg/MMBtu) <sup>1</sup>	GHG Mass Emissions <sup>2</sup> (metric ton/yr)	Global Warming Potential <sup>3</sup>	CO <sub>2</sub> e (metric ton/yr)	CO <sub>2</sub> e (tpy)
Turbine 1 Duct Burners	120	1,051,200	CO <sub>2</sub>	53.02	55,735	1	55,735	61,447
			CH <sub>4</sub>	1.0E-03	1.05	25	26.3	29.0
			N <sub>2</sub> O	1.0E-04	0.11	298	31.3	34.5
				<b>Totals</b>	<b>55,736</b>		<b>55,792</b>	<b>61,511</b>
Turbine 2 Duct Burners	120	1,051,200	CO <sub>2</sub>	53.02	55,735	1	55,735	61,447
			CH <sub>4</sub>	1.0E-03	1.05	25	26.3	29.0
			N <sub>2</sub> O	1.0E-04	0.11	298	31.3	34.5
				<b>Totals</b>	<b>55,736</b>		<b>55,792</b>	<b>61,511</b>
<b>Total, All Natural Gas Duct Firing</b>					<b>111,472</b>		<b>111,584</b>	<b>123,022</b>

Notes:

1. CO<sub>2</sub> GHG factor from Table C-1 of 40 CFR 98 Mandatory Greenhouse Gas Reporting (GHG MRR).  
 CH<sub>4</sub> and N<sub>2</sub>O GHG factors based on Table C-2 of GHG MRR.
2. CO<sub>2</sub> emissions based on 40 CFR Part 98, Subpart C, Equation C-1.
3. Global Warming Potential factors based on Table A-1 of 40 CFR 98 Mandatory Greenhouse Gas Reporting.

Sample Calculation, CO<sub>2</sub>:

GHG Mass Emissions (metric ton/yr) = 0.001 x 1051200 (MMBtu/yr) x 53.02 kg/MMBtu = 55735

CO<sub>2</sub>e (metric ton/yr) = 55735 (metric ton/yr) x 1 = 55734.6

**Table A-4**  
**GHG Emission Calculations - OL Tail Gas Combustion**  
**Formosa Plastic Corporation, Texas**  
**2012 Expansion Project: Gas Turbines**  
**March 2014**

**Olefins (OL) Tail Gas Data:**

Variable	Value	Units	Reference
Net Heating Value (LHV)	624	Btu/scf	Formosa Design Specification
Carbon Content (Annual Avg)	0.677	kg C/kg	Formosa Design Specification
Molecular Weight (Annual Avg)	9.77	kg/kg-mol	Formosa Design Specification

**GHG Emissions Contribution from OL Tail Gas Combustion:**

Source Type	Average Heat Input/Unit (MMBtu/hr)	Annual Average Fuel Gas Usage/Unit <sup>1</sup> (MMscf/hr)	Annual Average Fuel Use, Each Unit (scf/yr)	Annual Average Heat Input, Each Unit (MMBtu/yr)	Pollutant	Emission Factor (kg/MMBtu) <sup>2</sup>	GHG Mass Emissions <sup>3</sup> (metric ton/yr)	Global Warming Potential <sup>4</sup>	CO <sub>2</sub> e (metric ton/yr)	CO <sub>2</sub> e (tpy)
Turbine 1 Duct Burners	120	0.192	1.68E+09	1.05E+06	CO <sub>2</sub>		48,109	1	48,109	53,040
					CH <sub>4</sub>	1.0E-03	1.05	25	26.28	29
					N <sub>2</sub> O	1.0E-04	0.11	298	31.33	35
					<b>Totals</b>		<b>48,110</b>		<b>48,166</b>	<b>53,103</b>
Turbine 2 Duct Burners	120	0.192	1.68E+09	1.05E+06	CO <sub>2</sub>		48,109	1	48,109	53,040
					CH <sub>4</sub>	1.0E-03	1.05	25	26.28	29
					N <sub>2</sub> O	1.0E-04	0.11	298	31.33	35
					<b>Totals</b>		<b>48,110</b>		<b>48,166</b>	<b>53,103</b>
<b>Total, All OL Tail Gas Combustion</b>							<b>96,220</b>		<b>96,333</b>	<b>106,207</b>

Notes:

- Fuel use calculated as:  $MMscf/hr = Firing\ rate\ (MMBtu/hr) / HHV\ (Btu/scf)$
- CH<sub>4</sub> and N<sub>2</sub>O GHG factors based on Table C-2 of 40 CFR 98 Mandatory Greenhouse Gas Reporting.
- CH<sub>4</sub> and N<sub>2</sub>O emissions based on 40 CFR Part 98, Subpart C, Equation C-8.
- CO<sub>2</sub> emissions based on 40 CFR Part 98, Subpart C, Equation C-5.
- Global Warming Potential factors based on Table A-1 of 40 CFR 98 Mandatory Greenhouse Gas Reporting.

Sample Calculation: Duct Burners Turbine 1 - CO<sub>2</sub>:

GHG Mass Emissions (metric ton/yr) =  $(44/12) \times 1.68E+09\ (scf/yr) \times 0.677\ kg\ C/kg \times 9.77\ kg/kg-mol / 849.5\ scf/kg-mole\ @\ std\ cond. \times 0.001 = 4.81E+04$   
 CO<sub>2</sub>e (metric ton/yr) =  $4.81E+04\ (metric\ ton/yr) \times 1 = 4.81E+04$

**Table A-4A**  
**GHG Emission Calculations - Duct Burners OL Tail Gas Combustion**  
**Formosa Plastic Corporation, Texas**  
**2012 Expansion Project: Gas Turbines**  
**March 2014**

**OL Tail Gas Composition**

Compound	Molecular Weight (lb/lbmol)	Lower Heating Value, LHV (Btu/lb)	Lower Heating Value, LHV (Btu/scf)	Molar Composition (mol %) [1]	Component Lower Heating Value, LHV (Btu/scf)	Number of carbons	Component Carbon Mass (lbC/lbmol)	Fuel Carbon Mass (lbC/lbmol)	Component Mass per Lbmol Gas (lb)	carbon content (lbC/lb)
Hydrogen	2.016	51,571	274	45.00%	123.44	0	0	0.000	0.907	<b>0.677</b>
Methane	16.04	21,504	910	55.00%	500.55	1	12	6.600	8.822	
Ethane	30.07	20,429	1,621	0.000050%	0.00	2	24	0.000	0.000	
Propane	44.09	19,923	2,318	0.000010%	0.00	3	36	0.000	0.000	
Carbon Monoxide	28.01	321	323	0.1500%	0.485	1	12	0.018	0.042	
Carbon Dioxide	44.009	0	0	0.0050%	0.000	1	12	0.001	0.002	

**Gross heating  
value = 624  
Btu/scf**

**MW = 9.77  
lb/lbmol**

Notes:

[1] Composition is representative and may vary. Estimated composition used for emission calculation purposes only.

**Table A-5**  
**GHG Emission Calculations -**  
**Gaseous Fuel Venting During Turbine Startup and**  
**Fuel Line Maintenance, EPNs 7K-NGVENT, 7L-NGVENT**  
**Formosa Plastic Corporation, Texas**  
**2012 Expansion Project: Gas Turbines**  
**March 2014**

Location	Initial Conditions			Final Conditions			Annual Frequency of Event	CO <sub>2</sub> <sup>3</sup>	CH <sub>4</sub> <sup>4</sup>	Total, both Turbines
	Volume <sup>1</sup> (ft <sup>3</sup> )	Press. (psig)	Temp. (°F)	Press. (psig)	Temp. (°F)	Volume <sup>2</sup> (scf)		Annual (tpy)	Annual (tpy)	Annual (tpy)
Turbine Startup	75.0	300	90	0	68	1,635	30	0.0336	0.98	
Fuel Line Maintenance	20.0	300	90	0	68	436	24	0.00718	0.210	
GHG Mass-Based Emissions								0.0408	1.19	1.24
Global Warming Potential <sup>5</sup>								1	25	
CO <sub>2</sub> e Emissions								0.0408	29.9	29.9

Notes:

- Initial volume is calculated by multiplying the crosssectional area by the length of pipe using the following formula:  $V_i = \pi [(diameter\ in\ inches/12)/2]^2 * length\ in\ feet = ft^3$
- Final volume calculated using ideal gas law  $[(PV/ZT)_i = (PV/ZT)_f]$ .  $V_f = V_i (P_i/P_f) (T_f/T_i) (Z_i/Z_f)$ , where Z is estimated using the following equation:  $Z = 0.9994 - 0.0002P + 3E-08P^2$ .
- CO<sub>2</sub> emissions based on vol% of CO<sub>2</sub> in natural gas 1.20% from natural gas analysis
- CH<sub>4</sub> emissions based on vol% of CH<sub>4</sub> in natural gas 96.6% from natural gas analysis
- Global Warming Potential factors based on Table A-1 of 40 CFR 98 Mandatory Greenhouse Gas Reporting.

Example calculation:

1635 scf Nat Gas	0.012 scf CO <sub>2</sub>	lbmole	44 lb CO <sub>2</sub>	ton =	=	0.0336	ton/yr CO <sub>2</sub>
yr	scf Nat Gas	385 scf	lbmole	2000 lb			

**Table A-6**  
**GHG Emission Calculations - Fugitive Component Emissions**  
**Formosa Plastic Corporation, Texas**  
**2012 Expansion Project: Gas Turbines**  
**March 2014**

**GHG Emissions Contribution From Fugitive Piping Components:**

EPN	Source Type	Fluid State	Count	Emission Factor <sup>1</sup> scf/hr/comp	CO <sub>2</sub> Content (vol %)	CH <sub>4</sub> Content (vol %)	CO <sub>2</sub> (tpy)	Methane (tpy)	Total (tpy)
NG-FUG	Valves	Gas/Vapor	600	0.121	1.20%	96.6%	0.436	12.80	
	Flanges	Gas/Vapor	2400	0.017			0.245	7.19	
	Relief Valves	Gas/Vapor	5	0.193			5.80E-03	1.70E-01	
	Sampling Connections	Gas/Vapor	10	0.031			1.86E-03	5.46E-02	
	Compressors	Gas/Vapor	3	0.002			3.60E-05	1.06E-03	
<b>GHG Mass-Based Emissions</b>							0.689	20.2	<b>20.9</b>
<b>Global Warming Potential<sup>2</sup></b>							1	25	
<b>CO<sub>2</sub>e Emissions</b>							0.69	505.4	<b>506.1</b>

Notes:

1. Emission factors from Table W-1A of 40 CFR 98 Mandatory Greenhouse Gas Reporting
2. Global Warming Potential factors based on Table A-1 of 40 CFR 98 Mandatory Greenhouse Gas Reporting.

*Example calculation:*

600 valves	0.121 scf gas	0.012 scf CO <sub>2</sub>	lbmol	44.01 lb CO <sub>2</sub>	8760 hr	ton	0.44	ton/yr
	hr * valve	scf gas	385 scf	lbmol	yr	2000 lb		



**Table A-7**  
**GHG Emission Calculations - Electrical Equipment Insulated with SF<sub>6</sub>**  
**Formosa Plastic Corporation, Texas**  
**2012 Expansion Project: Gas Turbines**  
**March 2014**

<b>EPN</b>	<b>Insulated SF<sub>6</sub> Circuit Breaker Capacity (pounds)</b>	<b>Annual Leak Rate, wt %</b>	<b>Annual Leak Rate (tpy)</b>	<b>Global Warming Potential<sup>1</sup></b>	<b>Estimated Annual CO<sub>2</sub>e Emission Rate (tpy)</b>
SF6-FUG	495	0.50%	1.24E-03	22,800	28.2

Notes:

1. Global Warming Potential factors based on Table A-1 of 40 CFR 98 Mandatory Greenhouse Gas Reporting.