

Fact Sheet



For Final Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-05100142-2020**

Application Received: **April 19, 2019**

Plant Identification Number: **051-00142**

Permittee: **Blue Racer Midstream, LLC**

Facility Name: **Natrium Extraction and Fractionation Processing Plant (NPP)**

Mailing Address: **5949 Sherry Lane, Suite 1300; Dallas, TX 75225**

Physical Location:	Proctor, Marshall County, West Virginia
UTM Coordinates:	512.1 km Easting • 4,400.8 km Northing • Zone 17
Directions:	Facility is located North of New Martinsville, WV off of State Route 2 at 14786 Energy Road, Proctor, WV 26055

Facility Description

The Natrium Extraction and Fractionation Processing Plant (SIC Code: 1321) is a natural gas processing plant with natural gas liquids (NGL) processing capability (utilizing seven (7) permitted cryogenic plants) located approximately four (4) miles northwest of Proctor, Marshall County, WV along the east bank of the Ohio River. The facility has the capability to both process large amounts of raw natural gas (by separating out the liquids, drying it, and removing impurities) and to fractionate NGLs into usable components. NGLs are generally defined to be the lighter liquid components entrained in the gas stream as opposed to “condensate” which is the heavier, pentane plus (C5+) fraction of higher boiling point components that are separated at the well-head under standard conditions. NGLs - both after separation from gas pipelined to the site, as well as NGLs sent to the site via pipeline, truck, railcar, or barge - are separated (or “fractionated”) into their constituent organic compounds. The compounds ethane, propane, butane, i-butane, and natural gasoline are produced by the fractionation process.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2018 Actual Emissions
Carbon Monoxide (CO)	233.75	- ¹
Nitrogen Oxides (NO _x)	210.46	55.40
Particulate Matter (PM _{2.5})	29.47	24.40
Particulate Matter (PM ₁₀)	39.99	24.40
Total Particulate Matter (TSP)	72.16	24.40
Sulfur Dioxide (SO ₂)	2.66	0.80
Volatile Organic Compounds (VOC)	388.98	57.80

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2018 Actual Emissions
Benzene	0.68	-
Toluene	1.42	-
Ethylbenzene	<0.01	-
Xylene	0.99	-
n-Hexane	3.40	1.91
Formaldehyde	0.57	0.08
Methanol	8.41	-
Other HAPs	4.69	-
Total HAPs	20.16	1.99

Some of the above HAPs may be counted as PM or VOCs.

¹Not Reported.

Title V Program Applicability Basis

This facility has the potential to emit 233.75 TPY of CO, 210.46 TPY of NO_x, and 388.98 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Blue Racer Midstream, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Indirect heat exchangers
	45CSR6	Open burning prohibited.
	45CSR10	Sulfur Oxide Emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR permitting
	45CSR16	New stationary sources
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants for Source Categories Pursuant to 40 CFR, Part 63
	40 C.F.R. Part 60, Subpart Db	Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 60, Subpart Dc	Small Industrial-Commercial-Institutional Steam Generating Units
	40 C.F.R. Part 60, Subpart Kb	Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984
	40 C.F.R. Part 60, Subpart KKK	Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011
	40 C.F.R. Part 60, Subpart OOOO	Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and on or before September 18, 2015
	40 C.F.R. Part 60, Subpart OOOOa	Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015
	40 C.F.R. Part 60, Subpart IIII	CI RICE NSPS
	40 C.F.R. Part 60, Subpart JJJJ	SI RICE NSPS
40 C.F.R. Part 61	Asbestos inspection and removal	
40 C.F.R. Part 63, Subpart HH	Oil and Natural Gas Production Facilities MACT	
40 C.F.R. Part 63, Subpart ZZZZ	RICE MACT	
40 C.F.R. Part 82, Subpart F	Ozone depleting substances	
State Only:	45CSR4	No objectionable odors.
	45CSR17	Fugitive Particulate Matter.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2896G	February 18, 2020	
CO-R13,30-E-2018-10	January 21, 2019	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

Determinations and Justifications

Consent Order: CO-R13,30-E-2018-10

As stated in item 6.d of the Findings of Fact section of this consent order:

“Flare S004 exceeded the total gas throughput limit of 2.63 mmscf/yr and 1,664 mmBTU/yr.

Operating Year	Flare S004 Gas Throughput (million ft ³)	Flare Heat Input (million BTU/yr)
2014	671	952,463
2015	560	795,393

The permit application specified the total flare gas throughput is 1.03 mmscf/yr (purge) + 1 mmscf/yr (maint/blowdown) + 0.6 mmscf/yr (PRVs). The above actual waste gas throughput resulted in the facility-wide NO_x and CO emissions exceeding 100 TPY, which would subject the facility to Title V permitting requirements in WV Rule 45CSR30. The facility is operating without a Title V permit in violation of WV Rule 45CSR30.”

Since the facility’s NO_x and CO emissions exceed 100 TPY, the facility is considered a Title V major source, and item 1 of the Order of Compliance section required the facility to submit a Title V permit application.

Section 3.0: Facility Wide Requirements

In addition to boilerplate language, this section contains the following additional requirements:

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
3.1.9.	Minor Source of HAPs	N/A	4.1.2.
3.1.10.	Operation and Maintenance of Air Pollution Control Equipment	45CSR§13-5.10.	4.1.3.
3.1.11.	Maximum Throughput Limitation	45CSR§13-5.10.	4.1.5.
3.1.12.	Fugitive Emissions	45CSR§17-3.1.	N/A
3.1.13.	Violations of Fugitive Emissions Requirements	45CSR§17-3.2.	N/A
3.4.1.	Records of Monitoring Information	45CSR§30-5.1.c.2.A.	4.1.1. ¹
3.4.4.	Record of Malfunctions of Air Pollution Control Equipment	N/A	4.1.4.

¹Boilerplate requirement with R13-2896G citation added.

Section 4.0: Hot Oil Heaters [emission unit ID(s): S001, S016-S019, S052-S053]

These heaters are subject to the following:

- NSR Permit Requirements
- 45CSR2: 45CSR2 “establishes emission limitations for smoke and particulate matter which are discharged from fuel burning units.” A fuel burning unit is defined under 45CSR2 as any “furnace, boiler apparatus, device, mechanism, stack or structure used in the process of burning fuel or other combustible material for the primary purpose of producing heat or power by indirect heat transfer.” The hot oil heaters are defined as fuel burning units and are subject to 45CSR2. The heaters are subject to an opacity limit, weight emission standards, Method 9 observations, any testing the director may deem appropriate, and recordkeeping requirements. According to 45CSR§2-8.4(b), the hot oil heaters are exempt from 45CSR§§2-8.1(a) and 8.2 (testing and monitoring requirements) since they only combust natural gas.
- 45CSR10: The purpose of 45CSR10 is to “prevent and control air pollution from the emission of sulfur oxides.” 45CSR10 has requirements limiting SO₂ emissions from “fuel burning units,” limiting in-stack SO₂ concentrations of “manufacturing process source operations,” and limiting H₂S concentrations in “process gas” streams that are combusted. Only the SO₂ limitations on fuel burning units potentially apply at the facility. The hot oil heaters are subject to the sulfur dioxide weight emission limit in 45CSR§10-3.1.e. According to 45CSR§10-10.3, the hot oil heaters are not subject to the Testing and MRR Requirements under Section 8 of 45CSR10 or 45CSR10A since they combust natural gas.
- 45CSR16
- 40CFR60, Subpart Db (Hot Oil Heater S001): 40CFR60, Subpart Db is the federal NSPS for “steam generating units” that have Maximum Design Heat Input (MDHI) of greater than 100 mmBtu/hr and

that were constructed, modified, or reconstructed after June 19, 1984. Subpart Db contains emission standards, compliance methods, monitoring requirements, and reporting and record-keeping procedures for affected facilities subject to the rule. Subpart Db defines a “Steam Generating Unit” as “a device that combusts any fuel or by-product/waste and produces steam or heats water or heats any heat transfer medium.”

The following table outlines the criteria pollutant emission standards under Subpart Db applicable to the large Hot Oil Heater and the associated proposed emission rates:

Reference	Pollutant	Standard	S001 Emission Rate
§60.42b(k)	SO ₂	Exempt from emission standard pursuant to §60.42b(k)(2)	0.001 lb/mmBtu
§60.43b	Particulate Matter	No emission standard given for natural gas.	0.00745 lb/mmBtu
§60.44b(a)(1)	NO _x	0.10 lb/MMBtu ¹	0.045 lb/mmBtu

¹Low heat release < 70,000 Btu/hr-ft³

Sections §60.45b and §60.46b outline the compliance and performance procedures for SO₂ and NO_x, respectively. Sections §60.47b and §60.48b outline the monitoring requirements that apply to steam generating units and §60.49b provides the reporting and record-keeping requirements. Blue Racer will be required to comply with all applicable requirements, including the requirement to use a NO_x CEMS, to determine initial and continuing compliance with the emission standards pursuant to Subpart Db.

- 40CFR60, Subpart Dc (Hot Oil Heaters S016-S019 and S052-S053): 40CFR60, Subpart Dc is the federal NSPS for “steam generating units” that have a Maximum Design Heat Input (MDHI) of less than 100 mmBtu/hr and greater than 10 mmBtu/hr and that were constructed, modified, or reconstructed after June 9, 1989. Subpart Dc contains emission standards, compliance methods, monitoring requirements, and reporting and record-keeping procedures for affected facilities subject to the rule. Hot Oil Heaters S016-S019 and S052-S053 are subject to Subpart Dc. Subpart Dc does not, however, have any emission standards for gas fired units. Therefore, the heaters are only subject to the record-keeping given under §60.48c.

The following permit conditions apply to these heaters:

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
4.1.1.	Maximum Design Heat Input (MDHI)	N/A	5.1.1.
4.1.2.	Emission Limits	45CSR§2-4.1.b.; 45CSR§10-3.1.e. ¹	5.1.2.
4.1.3.	Natural Gas Consumption Limits	N/A	5.1.3.
4.1.4.	45CSR2	N/A	5.1.4.
4.1.4.a.	10% Opacity Limit	45CSR§2-3.1.	
4.1.4.b.	Particulate Emission Limit	45CSR§2-4.1.b ¹	
4.1.4.c.	Start-ups, Shutdowns, and Malfunctions	45CSR§2-9.1.	
4.1.5.	40 CFR 60, Subpart Db (S001)	N/A	
4.1.5.a.	Low Sulfur Fuel Exemption	45CSR16; 40CFR§60.42b(k)(2)	5.1.5.
4.1.5.b.	NO _x Emissions	45CSR16; 40CFR§§60.44b(a)(1)(i) and (ii)	
4.1.5.c.	CEMS	45CSR16; 40CFR§60.48b(b)(1)	
4.1.5.d.	Quarterly Fuel	N/A	
4.1.6.	40 CFR 60, Subpart Dc (S016-S019 and S052-S053)	N/A	5.1.6.
4.2.1.	Method 9 Observations	45CSR§2-3.2	5.2.1.
4.2.2.	40 CFR 60, Subpart Db Monitoring (S001)	N/A	N/A
4.2.2.a.	CEMS Operation	45CSR16; 40CFR§60.48b(c)	
4.2.2.b.	Record One-Hour Average NO _x Measured by CEMS	45CSR16; 40CFR§60.48b(d)	
4.2.2.c.	Installation, Evaluation, and Operation of the CEMS	45CSR16; 40CFR§60.48b(e)	
4.2.2.d.	CEMS Data Not Obtained	45CSR16; 40CFR§60.48b(f)	
4.3.1.	Testing for Compliance with 4.1.2.	45CSR§§2-8.1.b and 8.1.c	5.3.1.
4.4.1.	Records of Fuel Usage	N/A	N/A
4.4.1.a.	Monthly and 12-Month Rolling Total of Natural Gas Consumed	N/A	5.4.1.

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
4.4.1.b	Records of Operating Schedule and Quantity and Quality of Fuel Consumed	45CSR§2-8.3.c	N/A
4.4.1.c	Monthly Records of Date and Time of Start-up and Shutdown, and Quantity of Fuel Consumed	45CSR§2A-7.1.a.1	N/A
4.4.2.	Recordkeeping under 40 CFR 60, Subpart Db (S001)	N/A	N/A
4.4.2.a.	Records of Amounts of Each Fuel Combusted During Each Day	45CSR16; 40CFR§60.49b(d)(1)	
4.4.2.b.	Records for NO _x Standards	45CSR16; 40CFR§60.49b(g)	
4.4.2.c.	Records for Fuel-Based Compliance Alternatives	45CSR16; 40CFR§60.49b(r)	
4.4.3.	40 CFR 60, Subpart Dc Records (S016-S019 and S052-S053)	N/A	N/A
4.4.3.a.	Daily Fuel Records	45CSR16; 40CFR§60.48c(g)(1)	
4.4.3.b.	Alternative: Monthly Records	45CSR16; 40CFR§60.48c(g)(2)	
4.4.3.c.	Alternative: Monthly Records	45CSR16; 40CFR§60.48c(g)(3)	
4.4.3.d.	Maintain Records for 2 Years	45CSR16; 40CFR§60.48c(i)	
4.5.1.	Reporting Deviations from Allowable Visible Emissions	N/A	5.5.1.
4.5.2.	40 CFR 60, Subpart Db (S001): Reporting	N/A	N/A
4.5.2.a.	CEMS Reporting	45CSR16; 40CFR§60.48b(b)	
4.5.2.b.	Excess Emissions Reporting	45CSR16; 40CFR§60.48b(h)(2)(i)	

¹Condition 4.1.2 hourly PM and SO₂ limits streamline compliance with the less stringent hourly PM limits from 45CSR§2-4.1.b and hourly SO₂ limits from 45CSR§10-3.1.e. The permit PM limit for S001 is 1.61 lb/hr, and the PM limit as calculated from 45CSR§2-4.1.b is 19.5 lb/hr. The permit PM limit for S016-S019 and S052-S053 is 0.46 lb/hr, and the PM limit as calculated from 45CSR§2-4.1.b is 5.54 lb/hr. The permit SO₂ limit for S001 is 0.15 lb/hr, and the SO₂ limit as calculated from 45CSR§10-3.1.e is 671.77 lb/hr. The permit SO₂ limit for S016-S019 and S052-S053 is 0.04 lb/hr, and the SO₂ limit as calculated from 45CSR§10-3.1.e is 190.90 lb/hr.

Section 5.0: Cryogenic HMO/Stabilizer Heaters [emission unit ID(s): S013, S026, S037, S041, S045, S049, S056]

These heaters are subject to the following:

- NSR Permit Requirements
- 45CSR2: 45CSR2 “establishes emission limitations for smoke and particulate matter which are discharged from fuel burning units.” A fuel burning unit is defined under 45CSR2 as any “furnace, boiler apparatus, device, mechanism, stack or structure used in the process of burning fuel or other combustible material for the primary purpose of producing heat or power by indirect heat transfer.” The Cryogenic HMO/Stabilizer Heaters are defined as fuel burning units and are subject to 45CSR2. The heaters are subject to an opacity limit, weight emission standard, Method 9 observations, any testing the director may deem appropriate, and recordkeeping requirements. According to 45CSR§2-8.4(b), the Cryogenic HMO/Stabilizer Heaters are exempt from 45CSR§§2-8.1(a) and 8.2 (testing and monitoring requirements) since they combust natural gas.
- 45CSR10: The purpose of 45CSR10 is to “prevent and control air pollution from the emission of sulfur oxides.” 45CSR10 has requirements limiting SO₂ emissions from “fuel burning units,” limiting in-stack SO₂ concentrations of “manufacturing process source operations,” and limiting H₂S concentrations in “process gas” streams that are combusted. Only the SO₂ limitations on fuel burning units potentially apply at the facility. The Cryogenic HMO/Stabilizer Heaters are subject to the sulfur dioxide weight emission limit in 45CSR§10-3.1.e. According to 45CSR§10-10.3, the Cryogenic HMO/Stabilizer Heaters are not subject to the Testing and MRR Requirements under Section 8 of 45CSR10 or 45CSR10A since they combust natural gas.
- 45CSR16
- 40CFR60, Subpart Dc: 40CFR60, Subpart Dc is the federal NSPS for “steam generating units” that have a Maximum Design Heat Input (MDHI) of less than 100 mmBtu/hr and greater than 10 mmBtu/hr and that were constructed, modified, or reconstructed after June 9, 1989. Subpart Dc contains emission standards, compliance methods, monitoring requirements, and reporting and record-keeping procedures for affected facilities subject to the rule. The Cryogenic HMO/Stabilizer Heaters are subject to Subpart Dc. Subpart Dc does not, however, have any emission standards for gas fired units. Therefore, the heaters are only subject to the record-keeping requirements given under §60.48c.

The following permit conditions apply to these heaters:

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
5.1.1.	Maximum Design Heat Input (MDHI)	N/A	6.1.1.
5.1.2.	Emission Limits	45CSR§2-4.1.b.; 45CSR§10-3.1.e. ¹	6.1.2.
5.1.3.	Natural Gas Consumption Limits	N/A	6.1.3.
5.1.4.	45CSR2	N/A	6.1.4.
5.1.4.a.	10% Opacity Limit	45CSR§2-3.1.	
5.1.4.b.	Particulate Emission Limit	45CSR§2-4.1.b. ¹	
5.1.4.c.	Start-ups, Shutdowns, & Malfunctions	45CSR§2-9.1.	

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
5.1.5.	40 CFR 60, Subpart Dc	N/A	6.1.5.
5.2.1.	Method 9 Observations	N/A	6.2.1.
5.3.1.	Testing for Compliance with 5.1.4.	45CSR§2-3.2.	6.3.1.
5.3.2.	Testing for Compliance with 5.1.2.	45CSR§§2-8.1.b and 8.1.c	N/A
5.4.1.	Records of Fuel Usage	N/A	N/A
5.4.1.a.	Monthly and 12-Month Rolling Total of Natural Gas Consumed	N/A	6.4.1.
5.4.1.b	Records of Operating Schedule and Quantity and Quality of Fuel Consumed	45CSR§2-8.3.c	N/A
5.4.1.c.	Monthly Records of Date and Time of Start-up and Shutdown, and Quantity of Fuel Consumed	45CSR§2A-7.1.a.1	N/A
5.4.2.	Records of all Monitoring Data in 5.2.1.	N/A	6.4.2.
5.4.3.	40 CFR 60, Subpart Dc Records	N/A	N/A
5.4.3.a.	Daily Fuel Records	45CSR16; 40CFR§60.48c(g)(1)	
5.4.3.b.	Alternative: Monthly Records	45CSR16; 40CFR§60.48c(g)(2)	
5.4.3.c.	Alternative: Monthly Records	45CSR16; 40CFR§60.48c(g)(3)	
5.4.3.d.	Maintain Records for 2 Years	45CSR16; 40CFR§60.48c(i)	
5.5.1.	Reporting Deviations from Allowable Visible Emissions	N/A	6.5.1.

¹Condition 5.1.2 hourly PM and SO₂ limits streamline compliance with the less stringent hourly PM limits from 45CSR§2-4.1.b and hourly SO₂ limits from 45CSR§10-3.1.e. The permit PM limit for S013, S026, S037, S045, and S049 is 0.20 lb/hr, and the PM limit as calculated from 45CSR§2-4.1.b is 2.37 lb/hr. The permit PM limit for S041 is 0.41 lb/hr, and the PM limit as calculated from 45CSR§2-4.1.b is 4.92 lb/hr. The permit SO₂ limit for S013, S026, S037, S045, and S049 is 0.02 lb/hr, and the SO₂ limit as calculated from 45CSR§10-3.1.e is 81.53 lb/hr. The permit SO₂ limit for S041 is 0.04 lb/hr, and the SO₂ limit as calculated from 45CSR§10-3.1.e is 169.48 lb/hr.

Section 6.0: Regeneration Gas Heaters [emission unit ID(s): S012, S024, S036, S040, S044, S048]

These heaters are subject to the following:

- NSR Permit Requirements

45CSR2 “establishes emission limitations for smoke and particulate matter which are discharged from fuel burning units.” A fuel burning unit is defined under 45CSR2 as any “furnace, boiler apparatus, device, mechanism, stack or structure used in the process of burning fuel or other combustible material for the primary purpose of producing heat or power by indirect heat transfer.” Additionally, the definition of "Indirect Heat Exchanger" specifically excludes process heaters, which are defined as “a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.” Based on these definitions, the regeneration gas heaters are not subject to 45CSR2 as it is properly defined as a process heater. Therefore, conditions 7.1.4, 7.2.1, 7.3.1, 7.4.2, and 7.5.1 of R13-2896G were not included in the Title V permit.

The following permit conditions apply to these heaters:

Title V Permit Condition	Summary of Permit Condition	R13-2896G Condition
6.1.1.	Maximum Design Heat Input (MDHI)	7.1.1.
6.1.2.	Emission Limits	7.1.2.
6.1.3.	Natural Gas Consumption Limits	7.1.3.
6.4.1.	Monthly and 12-Month Rolling Total of Natural Gas Consumed	7.4.1.

Section 7.0: Fire Pumps [emission unit ID(s): S002, S003]

The fire pumps are subject to the following:

- NSR Permit Requirements
- 45CSR16
- 45CSR34
- 40CFR60, Subpart III: the fire pumps are both compression ignition (CI) engines with engine displacements of less than 30 l/cyl. These engines are subject to the emission limitations of 40CFR§60.4205(c) and Table 4 of 40CFR60, Subpart III. Fire pump engines are subject to the emergency engine requirements of this rule. These requirements include time limits on use during non-emergencies and use of a non-resettable hour meter (and associated records) to monitor engine use.
- 40CFR63, Subpart ZZZZ: as specified in 40CFR§63.6590(c), compliance with 40CFR63, Subpart ZZZZ is achieved through compliance with 40CFR60, Subpart III.

The following permit conditions apply to the fire pumps:

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
7.1.1.	Non-emergency Fuel Use Limits	N/A	8.1.1.
7.1.2.	Maximum Emissions	45CSR16; 40CFR§§60.4205(c) and 4206; Table 4 of 40CFR60, Subpart III	8.1.2. and 8.1.4.
7.1.3.	Maximum Annual Operation Limitation	N/A	8.1.3.
7.1.4.	Diesel Fuel Requirements	45CSR16; 40CFR§60.4207(b)	N/A
7.1.5.	Compliance with 40CFR63, Subpart ZZZZ by complying with 40CFR60, Subpart III	45CSR34; 40CFR§63.6590(c)	8.1.5.
7.1.6.	Compliance Requirements	45CSR16; 40CFR§§60.4211(a), (c), (f), (g)(3)	N/A
7.1.7.	General Provisions of 40CFR60	45CSR16; 40CFR§60.4218	N/A
7.2.1.	Non-resettable Hour Meter	45CSR16; 40CFR§60.4209(a)	N/A
7.3.1.	Performance Testing	45CSR16; 40CFR§60.4212	N/A
7.4.1.	Records of Hours of Operation	45CSR16; 40CFR§60.4214(b)	N/A

Section 8.0: Emergency Generator [emission unit ID(s): S057]

The emergency generator is subject to the following:

- NSR Permit Requirements
- 45CSR16
- 45CSR34
- 40CFR60, Subpart JJJJ: Blue Racer is authorized to install and operate one (1) or more natural gas-fired, 4-Stroke Lean Burn (4SLB) spark ignition reciprocating internal combustion engines (RICE) with an aggregate horsepower not to exceed 16,000 to act as emergency generators. While, specific make, model and hp of the individual units have not yet been specified, maximum emissions from each of the engines shall not exceed their individual limits as given in 40 CFR 60, Subpart JJJJ, specifically as limited under 40CFR§63.4233(e) and Table 1 of 40CFR60, Subpart JJJJ. This rule also contains requirements for emergency engine operation. These requirements include time limits on use during non-emergencies and use of a non-resettable hour meter (and associated records) to monitor engine use.
- 40CFR63, Subpart ZZZZ: as specified in 40CFR§63.6590(c), compliance with 40CFR63, Subpart ZZZZ is achieved through compliance with 40CFR60, Subpart JJJJ.

The following permit conditions apply to the emergency generator(s):

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
8.1.1.	Maximum Emissions	45CSR16; 40CFR§§60.4233(e) and 4234; Table 1 of 40CFR60, Subpart JJJJ	9.1.1. and 9.1.3.
8.1.2.	Maximum Annual Operation Limitation	45CSR16; 40CFR§60.4237	9.1.2.
8.1.3.	Emergency Engine Requirements	45CSR16; 40CFR§60.4243(d)	N/A
8.1.4.	AFR Controller	45CSR16; 40CFR§60.4243(g)	N/A
8.1.5.	Compliance Demonstration	45CSR16; 40CFR§§60.4243(b)(1) and (b)(2)	N/A
8.1.6.	Propane Fuel	45CSR16; 40CFR§60.4243(e)	N/A
8.1.7.	General Provisions of 40CFR60	45CSR16; 40CFR§60.4246	N/A
8.1.8.	Compliance with 40CFR63, Subpart ZZZZ by complying with 40CFR60, Subpart JJJJ	45CSR34; 40CFR§63.6590(c)	9.1.4.
8.3.1.	Performance Testing	45CSR16; 40CFR§60.4244	N/A
8.4.1.	Records of Notification, Maintenance, Engine Documentation, Hours of Operation	45CSR16; 40CFR§§60.4245(a) and (b)	N/A

Section 9.0: Glycol Dehydration Units [emission unit ID(s): S006, S029, S032]

The dehydration units are subject to the following:

- NSR Permit Requirements
- 45CSR6: The Vapor Combustor (V003) meets the definition of an “incinerator” under 45CSR6 and is, therefore, subject to the requirements therein. The combustor is subject to the emission standards for incinerators in 45CSR§6-4.1 and opacity limits for incinerators in 45CSR§§6-4.3 and 4.4. Emissions of particles large enough to be distinguished in the open air is prohibited, as stated in 45CSR§6-4.5., and objectionable odors are also prohibited as stated in 45CSR§6-4.6.
- 45CSR34
- 40CFR63, Subpart HH: 40 CFR63, Subpart HH does apply to this facility; however, because the facility is an area source of HAP emissions, and the actual average emissions of benzene from each glycol dehydration unit process vent to the atmosphere is below 0.90 megagram per year (1.0 TPY), the dehydration units are exempt from the requirements of 40CFR§60.764(d). The only requirement is to maintain records of the actual average benzene emissions per year, as specified in 40CFR§63.774(d)(1)(ii). This rule does not apply to storage vessels (tanks), compressors, or ancillary equipment because the subject facility is an area source of HAP emissions, as stated in 40CFR§63.760(b)(2). As stated in 40CFR§63.775(c)(8), an owner or operator of a TEG dehydration unit located at an area source that meets the criteria in 40CFR§§63.764(e)(1)(i) or §63.764(e)(1)(ii) is exempt from the reporting requirements for area sources in 40CFR§§63.775(c)(1) through (7), for that unit.

45CSR2 “establishes emission limitations for smoke and particulate matter which are discharged from fuel burning units.” A fuel burning unit is defined under 45CSR2 as any “furnace, boiler apparatus, device, mechanism, stack or structure used in the process of burning fuel or other combustible material for the primary purpose of producing heat or power by indirect heat transfer.” Additionally, the definition of "Indirect Heat Exchanger" specifically excludes process heaters, which are defined as “a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst.” Based on these definitions, the Glycol Reboiler (S029) is not subject to 45CSR2 as it is properly defined as a process heater. Therefore, condition 10.1.6.d of R13-2869F was not included in the Title V permit.

The following permit conditions apply to the dehydration units:

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
9.1.1.	Maximum Aggregate Wet Natural Gas Throughput	N/A	10.1.1.
9.1.2.	Maximum Glycol Recirculation Rate	N/A	10.1.2.
9.1.3.	VOC and HAP Emission Limits	N/A	10.1.3.
9.1.4.	Still Vent and Flash Tank Vapor Routing	N/A	10.1.4.
9.1.5.	40CFR63, Subpart HH: Exemptions	45CSR34; 40 CFR §§63.764(e)(1)(i) and (ii)	10.1.5.
9.1.6.	Reboiler (S029) Operation	N/A	10.1.6.

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
9.1.7.	Vapor Combustor (V003) Operation	N/A	10.1.7.
9.1.8.	Vapor Combustor (V003): 45CSR6	N/A	N/A
9.1.8.a.	PM Emission Limit	45CSR§6-4.1	N/A
9.1.8.b.	Opacity Limit	45CSR§6-4.3	N/A
9.1.8.c.	Opacity Limit: Startup and Stoking	45CSR§6-4.4	N/A
9.1.8.d.	No Emission of Unburned or Partially Burned Refuse or Ash	45CSR§6-4.5	N/A
9.1.8.e.	Objectionable Odors	45CSR§6-4.6	N/A
9.1.9.	Determination of actual average benzene or BTEX emissions	45CSR34; 40CFR§63.772(b)(2)	N/A
9.2.1.	Monthly and Rolling Twelve-month Records of Wet Gas Throughputs	N/A	10.2.1.
9.2.2.	Quarterly Readings of Glycol Pump(s) Rate	N/A	10.2.2.
9.2.3.	Representative Gas Sample Collection and Analysis Frequency	N/A	10.2.3.
9.2.4.	Pilot Flame Monitoring and Maintenance	N/A	10.2.4
9.3.1.	Wet Natural Gas Sampling	N/A	10.3.1.
9.3.2.	Visible Emissions Checks	N/A	10.3.2.
9.3.3.	Stack Testing	45CSR§§6-7.1 and 7.2	10.3.3.
9.4.1.	Records of Pilot Flame Absence	N/A	10.4.1.
9.4.2.	Records of Visible Emissions	N/A	10.4.2.
9.4.3.	Records of Manufacturer's Specifications for Operating and Maintenance to Maintain Control Efficiency	N/A	10.4.3.
9.4.4.	Records of Testing	N/A	10.4.4.
9.4.5.	Records of Actual Average Benzene Emissions	45CSR34; 40CFR§63.774(d)(1)(ii)	N/A
9.5.1.	Visible Emissions Deviations Reporting	N/A	10.5.1.
9.5.2.	Bypass Event Reporting	N/A	10.5.2.
9.5.3.	Non-operation of Air Pollution Control Device Reporting	N/A	10.5.3.

Section 10.0: 40 CFR 60 Subpart Kb, Storage Tanks [emission unit ID(s): TK-802, TK-2802, TK-3802, TK-4802, TK-5802, TK-6802, TK-7802, VRU]

40CFR60, Subpart Kb is the NSPS for storage tanks containing Volatile Organic Liquids (VOLs) which construction commenced after July 23, 1984. The Subpart applies to storage vessels used to store volatile organic liquids with a capacity greater than or equal to 75 m³ (19,813 gallons). However, storage tanks with a capacity greater than or equal to 151 m³ (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa are exempt from Subpart Kb. Additionally, pursuant §60.110b(d)(2), “[P]ressure vessels designed to operate in excess of 204.9 kPa and without emissions to the atmosphere” are exempt from Subpart Kb. The Natural Gasoline Storage Tanks (TK-802, TK-2802, TK-3802, TK-4802, TK-5802, and TK-6802) and the Refrigerated Propane Storage Tank (TK-7802) are subject to Subpart Kb. All other storage tanks used at this facility are exempt from Subpart Kb due to the aforementioned exemptions.

Therefore, based on the above, the equipment in this permit section are subject to the applicable provisions therein. Pursuant to §60.112b(b)(1), the applicable storage tanks are required to be equipped with a “closed vent system and control device as specified in §60.112b(a)(3).” The use of a natural gas blanket and a closed vent VRU system meets the requirements of §60.112b(a)(3). Additionally, Blue Racer will be required to meet all applicable monitoring, recordkeeping, and reporting requirements in Subpart Kb.

The following permit conditions apply to these storage tanks:

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
10.1.1.	Natural Gas Blanket	N/A	12.1.1.
10.1.2.	Refrigerated Propane Storage Tank (TK-7802) VRU	N/A	12.1.2
10.1.3.	VRU Capture Efficiency of 100%	N/A	12.1.3.
10.1.4.	Closed Vent System and Control Device	45CSR16; 40 CFR §§60.112b(a), (a)(3)(i), and (a)(3)(ii)	12.1.4.
10.1.5.	Control Device Documentation and Operation	45CSR16; 40CFR§60.113b(c)	N/A
10.2.1.	VRU Monitoring	N/A	12.2.1.
10.4.1.	Record of VRU Maintenance	N/A	12.3.1.
10.4.2.	Record of VRU Malfunctions	N/A	12.3.2.
10.4.3.	Closed Vent System and Control Device Records	45CSR16; 40CFR§§60.115b and 60.115b(c)	N/A
10.4.4.	Records Showing Dimensions and Capacities of Storage Vessels	45CSR16; 40CFR§§60.115b(a) and (b)	N/A
10.5.1.	Deviations Reporting	N/A	12.3.3.

Section 11.0: Flare [emission unit ID(s): S004A]

The flare is subject to the following:

- NSR Permit Requirements
- 45CSR6: Ground Flare (S004A) meets the definition of an “incinerator” under 45CSR6 and is, therefore, subject to the requirements therein. The flare is subject to the emission standards for incinerators in 45CSR§6-4.1 and opacity limits for incinerators in 45CSR§§6-4.3 and 4.4. Emissions of particles large enough to be distinguished in the open air is prohibited, as stated in 45CSR§6-4.5., and objectionable odors are also prohibited as stated in 45CSR§6-4.6.

The following permit conditions apply to the flare:

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
11.1.1.	Flare Specification	N/A	13.1.1.
11.1.2.	Flare Emissions Limits	N/A ¹	13.1.2.
11.1.3.	Heat Input of Waste Gases to the Flare	N/A	13.1.3.
11.1.4.	45CSR6 Requirements	N/A	13.1.4.
11.1.4.a.	Particulate Matter Emission Limit	45CSR§6-4.1. ¹	
11.1.4.b.	20% Opacity Limit	45CSR§6-4.3.	
11.1.4.c.	40% Startup Opacity Limit	45CSR§6-4.4.	
11.1.4.d.	No Particles Large Enough to be Distinguished in Open Air	45CSR§6-4.5.	
11.1.4.e.	No Objectionable Odors	45CSR§6-4.6.	
11.1.4.f.	Stack Testing	45CSR§6-7.1.	
11.1.4.g.	Other Testing as Necessary	45CSR§6-7.2.	
11.1.4.h.	Malfunctions	45CSR§6-8.2.	
11.1.5.	Pilot Flame	N/A	13.1.5.
11.1.6.	Flare VOC DRE of 98.0%	N/A	13.1.7.
11.1.7.	Inlet Gas Flow Rate of the Flare	N/A	13.1.8.
11.1.8.	Emergency Operation	N/A	13.1.9.
11.2.1.	Monitor Aggregate Throughput and Heat Input of Waste Gases Sent to Flare	N/A	13.2.1.
11.2.2.	Monitor Presence of Flare	N/A	13.2.2.
11.2.3.	Visible Emissions Monitoring and Recordkeeping	N/A	13.2.3.

Title V Permit Condition	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
11.4.1.	Records of Pilot Flame Absence	N/A	13.2.4.
11.5.1.	Test Protocol Submission	N/A	13.2.5.
11.5.2.	Deviations Reporting	N/A	13.2.6.
11.5.3.	Emergency Ground Flare Documentation	N/A	13.2.7.

¹Condition 11.1.2 hourly PM limits are streamlined with the less stringent hourly PM limits from 45CSR§6-4.1. The permit PM limit for S004A is 25.34 lb/hr, and the PM limit as calculated from 45CSR§6-4.1. is 690.34 lb/hr.

Section 12.0: Ethane Amine Units [emission unit ID(s): S011, S054]

The Ethane Amine Units are subject to the following requirements:

Title V Permit Condition	Summary of Permit Condition	R13-2896G Condition
12.1.1.	Maximum Throughput Limitation	14.1.1.
12.1.2.	Ethane Amine Unit Design and Operation	14.1.2.
12.1.3.	Off Gas Collected and Sent to Ground Flare (S004A)	14.1.3.
12.1.4.	Methanol and VOC Emission Limits for S011	14.1.4.
12.1.5.	Methanol and VOC Emission Limits for S054 and Vapor Recovery	14.1.5.
12.2.1.	Monitoring of Throughput of Either Sour or Treated Ethane	14.2.1.
12.2.2.	Monitoring of Percentage of Time S054 is Operated Without VRU	14.2.2.
12.3.1.	Sampling of Inlet Gas Stream	14.2.3.

Section 13.0: Other Storage Tanks and Liquids Loading/Unloading [emission unit ID(s): TK-906, TK-2906, TK-907, TK-2907, S008, S015, S033, S055, L-1]

40CFR60, Subpart Kb is the NSPS for storage tanks containing Volatile Organic Liquids (VOLs) which construction commenced after July 23, 1984. The Subpart applies to storage vessels used to store volatile organic liquids with a capacity greater than or equal to 75 m³ (19,813 gallons). However, storage tanks with a capacity greater than or equal to 151 m³ (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa are exempt from Subpart Kb. Additionally, pursuant §60.110b(b)(2), “Pressure vessels designed to operate in excess of 204.9 kPa and without emissions to the atmosphere” are exempt from Subpart Kb. The tanks in this permit section are exempt from Subpart Kb due to the aforementioned exemptions.

The Other Storage Tanks and Liquids Loading/Unloading are subject to the following requirements:

Title V Permit Condition	Summary of Permit Condition	R13-2896G Condition
13.1.1.	Maximum Design Capacity and Emissions for Material Loading/Unloading	15.1.1.
13.1.2.	Maximum Slop Oil/Produced Water Loaded into Trucks (S015), Gasoline Dispenser Loading (L-1), and Natural Gasoline Loaded into Barges (S033)	15.1.2.
13.1.3.	Vapor Balance	15.1.3.
13.1.4.	Submerged Fill Method of Loading of Slop Oil and Produced Water	15.1.4.
13.1.5.	Maximum Throughput and VOC Emission for TK-L-1, TK-906, TK-907, TK-2906, TK-2907	15.1.5.
13.4.1.	Records of Liquids Handled	15.2.1.

Section 14.0: Pigging Operations [emission unit ID(s): S034, S035]

The pigging operations are subject to the following requirements:

Title V Permit Condition	Summary of Permit Condition	R13-2896G Condition
14.1.1.	Use Flare (S034) During Propane Pig Trap Operations	16.1.1.
14.1.2.	Maximum Annual Combustion of Waste Gases in Pig Trap Flare	16.1.2.
14.1.3.	Maximum Combustion Exhaust Emissions (S034)	16.1.3.
14.1.4.	VOC and HAP Emissions	16.1.4.
14.1.5.	Pigging Flare Design and Operation	16.1.5.
14.1.6.	Refer to Condition 11.1.4. for 45CSR6 Requirements	16.1.6.
14.2.1.	To Show Compliance with 14.1.2, Calculate Throughput of Waste Gases	16.2.1.
14.2.2.	Record Number and Type of Pigging Events and the Estimated Volume	16.2.2.
14.2.3.	Visible Emissions Checks	16.2.3.

Section 15.0: 40 CFR 60 Subpart KKK, OOOO and OOOOa Requirements [emission unit ID(s): FUG AREA 1 through 7 and Compressors]

The following requirements from these subparts apply to this facility:

Title V Permit Condition	AREA(s)	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
15.1.1.	1	Operate FUG AREA 1 in Accordance with 40CFR60, Subpart KKK	N/A	17.1.1.
15.1.2.	1	Comply with 40CFR§§60.482-1 (a), (b), and (d) and 60.482-2 through 60.482-10, except as provided in 40CFR§60.633	45CSR16; 40CFR§60.632(a)	N/A
15.1.3.	2-3	Operate FUG AREA 2 and FUG AREA 3 in Accordance with 40CFR60, Subpart OOOO	N/A	17.1.2.
15.1.4.	2-3	Comply with 40CFR§§60.482-1a(a), (b), and (d), 60.482-2a, and 60.482-4a through 60.482-11a, except as provided in 40CFR§60.5401	45CSR16; 40CFR§60.5400(a)	N/A
15.1.5.	4-7	Operate FUG AREA 4 through 7 in Accordance with 40CFR60, Subpart OOOOa	N/A	17.1.3.
15.1.6.	4-7	Comply with the requirements of 40CFR§§60.482-1a(a), (b), and (d), 60.482-2a, and 60.482-4a through 60.482-11a, except as provided in 40CFR§60.5401a	45CSR16; 40CFR§60.5400a(a)	N/A
15.1.7.	1-7	Maintain Updated List of Groupings of Plant Components and Applicability to 40 CFR 60, Subpart KKK, OOOO, and OOOOa.	N/A	17.1.4.
15.1.8.	Compressors	Maintain list of all reciprocating compressors and the applicability of each to 40CFR60 Subpart OOOO and OOOOa.	N/A	17.1.5.
15.1.19.	Compressors	Subpart OOOO standards for compressors	45CSR16; 40CFR§60.5385	N/A
15.1.10.	Compressors	Closed vent system requirements for reciprocating compressors under Subpart OOOO	45CSR16; 40CFR§§60.5411 and 60.5411(a)	N/A
15.1.11.	Compressors	Subpart OOOOa standards for compressors	45CSR16; 40CFR§60.5385a	N/A

Title V Permit Condition	AREA(s)	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
15.1.12.	Compressors	Closed vent system requirements for reciprocating compressors under Subpart OOOOa	45CSR16; 40CFR§§60.5411a, 60.5411a(a), and 60.5411a(d)	N/A
15.1.113.	Compressors	Permittee is deemed to be in compliance with 40CFR60, Subpart OOOO if they are in compliance with all applicable provisions of 40CFR60, Subpart OOOOa	45CSR16; 40CFR§60.5370(d)	N/A
15.2.1.	1	Leak Detection	45CSR16; 40CFR§60.633(b)	N/A
15.2.2.	2-3	Leak Detection	45CSR16; 40CFR§60.5401(b)	N/A
15.2.3.	4-7	Leak Detection	45CSR16; 40CFR§60.5401a(b)	N/A
15.2.4.	Compressors	Initial compliance demonstration for 40 C.F.R. 60 Subpart OOOO	45CSR16; 40CFR§§60.5410 and 60.5410(c)	N/A
15.2.5.	Compressors	Continuous compliance demonstration for 40 C.F.R. 60 Subpart OOOO	45CSR16; 40CFR§60.5415(c)	N/A
15.2.6.	Compressors	Initial compliance demonstration for 40 C.F.R. 60 Subpart OOOOa	45CSR16; 40CFR§§60.5410a and 60.5410a(c)	N/A
15.2.7.	Compressors	Continuous compliance demonstration for 40 C.F.R. 60 Subpart OOOOa	45CSR16; 40CFR§§60.5415a and 60.5415a(c)	N/A
15.3.1.	Compressors	Inspections for closed vent systems installed on each reciprocating compressor affected facility under Subpart OOOO.	45CSR16; 40CFR§§ 60.5416, 60.5416(a), 60.5416(a)(1), (2), (3), and (4)	N/A
15.3.2.	Compressors	No detectable emissions test methods and procedures under Subpart OOOO.	45CSR16; 40CFR§§60.5416 and 60.5416(b)	N/A
15.3.3.	Compressors	Inspections for closed vent systems installed on each reciprocating compressor affected facility under Subpart OOOOa.	45CSR16; 40CFR§§60.5416a, 60.5416a(a), 60.5416a(a)(1), (2), and (4)	N/A
15.3.4.	Compressors	No detectable emissions test methods and procedures under Subpart OOOOa.	45CSR16; 40CFR§§60.5416a and 60.5416a(b)	N/A

Title V Permit Condition	AREA(s)	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
15.4.1.	1	Comply with 15.4.2 in addition to 40CFR§60.486	45CSR16; 40CFR§60.635(a)	N/A
15.4.2.	1	Marking Leaking Equipment and Leak Records	45CSR16; 40CFR§60.635(b)	N/A
15.4.3.	2-3	Comply with 15.4.4. in addition to 40CFR§60.486a	45CSR16; 40CFR§60.5421(a)	N/A
15.4.4.	2-3	Marking Leaking Equipment and Leak Records	45CSR16; 40CFR§60.5421(b)	N/A
15.4.5.	4-7	Comply with 15.4.6. in addition to 40CFR§60.486a	45CSR16; 40CFR§60.5421a(a)	N/A
15.4.6.	4-7	Marking Leaking Equipment and Leak Records	45CSR16; 40CFR§60.5421a(b)	N/A
15.4.7.	Compressors	Recordkeeping requirements under Subpart OOOO.	45CSR16; 40CFR§§60.5420(c), (c)(3), (c)(6), (c)(7), (c)(8), and (c)(9)	N/A
15.4.8.	Compressors	Recordkeeping requirements under Subpart OOOOa.	45CSR16; 40CFR§§60.5420a(c), (c)(3), (c)(6), (c)(7), (c)(8), (c)(9), and (c)(17)	N/A
15.5.1.	1	Comply with 15.5.2. and 15.5.3. in addition to 40CFR§60.487	45CSR16; 40CFR§60.636(a)	N/A
15.5.2.	1	Initial Semiannual Report	45CSR16; 40CFR§60.636(b)	N/A
15.5.3.	1	All Semiannual Reports	45CSR16; 40CFR§60.636(c)	N/A
15.5.4.	2-3	Comply with 15.5.5. and 15.5.6. in addition to 40CFR§§60.487a(a), (b), (c)(2)(i) through (iv), and (c)(2)(vii) through (viii)	45CSR16; 40CFR§60.5422(a)	N/A
15.5.5.	2-3	Initial Semiannual Report	45CSR16; 40CFR§60.5422(b)	N/A
15.5.6.	2-3	All Semiannual Reports	45CSR16; 40CFR§60.5422(c)	N/A
15.5.7.	4-7	Comply with 15.5.8. and 15.5.8. in addition to 40CFR§§60.487a(a), (b), (c)(2)(i) through (iv), and (c)(2)(vii) through (viii) and Submission of Semiannual Reports	45CSR16; 40CFR§60.5422a(a)	N/A

Title V Permit Condition	AREA(s)	Summary of Permit Condition	Regulatory Citation	R13-2896G Condition
15.5.8.	4-7	Initial Semiannual Report	45CSR16; 40CFR§60.5422a(b)	N/A
15.5.9.	4-7	All Semiannual Reports	45CSR16; 40CFR§60.5422a(c)	N/A
15.5.10.	Compressors	Reporting requirements under Subpart OOOO.	45CSR16; 40CFR§§60.5420(b), (b)(1), and (b)(4)	N/A
15.5.11.	Compressors	Reporting requirements under Subpart OOOOa.	45CSR16; 40CFR§§60.5420a(b), (b)(1), (b)(4) and (b)(11)]	N/A

40CFR64: Compliance Assurance Monitoring

Initial Title V Permit Applications must only include a CAM plan for large Pollutant Specific Emission Units (PSEUs). Since emissions at this facility are below major source thresholds for each PSEU, a CAM plan was not required with this application. CAM will, however be re-evaluated, at this permit’s renewal.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- a. 45CSR19 – *Requirements for Pre-Construction Review, Determination of Emission Offsets for Proposed New or Modified Stationary Sources of Air Pollutants and Emission Trading for Intrasource Pollutants*: The facility is in an SO₂ non-attainment area, but facility-wide SO₂ PTE of the plant is less than 100 TPY. Therefore, the facility is not defined as a “major stationary source” under 45CSR19.
- b. 45CSR27 – *To Prevent and Control the Emissions of Toxic Air Pollutants*: Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”
- c. 40 C.F.R. 63 Subpart HH – *National Emission Standards for Hazardous Air Pollutants for Oil and Natural Gas Production Facilities*: The facility would not be subject to the equipment leak standards under 40CFR§63.769 because it is an area source of HAPs, which limits applicability under Subpart HH to only the (TEG) dehydration unit according to §63.760(b)(2).
- d. 40 C.F.R. 63 Subpart DDDDD – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*: This subpart does not apply to the facility since it is not a major source of HAPs as defined in 40CFR§63.7575.
- e. 40 C.F.R. 63 Subpart JJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*: This subpart does not apply to the facility since the heaters are fueled by natural gas and gas-fired boilers are exempt per 40CFR§63.11195(e).

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: February 26, 2020
Ending Date: March 27, 2020

Point of Contact

All written comments should be addressed to the following individual and office:

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Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Response to Comments (Statement of Basis)

Not applicable.