

INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name Sunoco Pipeline, L.P.

Permitting Action Number R13-3284 Total Days 45 DAQ Days 22

Permitting Action:

- Permit Determination
- General Permit
- Administrative Update
- Temporary
- Relocation
- Construction
- Modification
- PSD (Rule 14)
- NNSR (Rule 19)

Documents Attached:

- Engineering Evaluation/Memo
- Draft Permit
- Notice
- Denial
- Final Permit/General Permit Registration
- Completed Database Sheet
- Withdrawal
- Letter
- Other (specify) _____

Date	From	To	Action Requested
1/21/2016	Jerry <i>on</i>	Bev	Please review and approve to go to notice.
<i>1/21</i>	<i>Bev</i>	<i>Jerry</i>	<i>Auto Notice</i>
<i>1/21</i>	<i>Jerry</i>	<i>SANDIE</i>	<i>APPROVED FOR NOTICE</i>

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).



Permit / Application Information Sheet
Division of Environmental Protection
West Virginia Office of Air Quality

Company:	Sunoco Pipeline L.C.	Facility:	Follansbee Station
Region:		Plant ID:	009-00128
Engineer:	Williams, Jerry	Application #:	13-3284
Physical Address:	376 White Tail Ridge Rd Wellsburg WV 26070	Category:	SIC: [4226] MOTOR FREIGHT TRANSPORTATION AND WAREHOUSING - SPECIAL WAREHOUSING & STORAGE NAICS: [493190] Other Warehousing and Storage
County:			
Other Parties:	Consultant - Plachy, Valerie 412-829-2610 ENGINEER - Gordon, Matthew 610-670-3284 ENV ENG - Embry, Christopher 610-670-3237		

Information Needed for Database and AIRS
1. Need valid physical West Virginia address with zip
2. Air Program
3. Inspection result
4. Pollutant and class

Regulated Pollutants

Summary from this Permit 13-3284		
Air Programs	Applicable Regulations	
Fee Program	Fee	Application Type
	\$1,000.00	CONSTRUCTION

Notes from Database

Activity Dates	
APPLICATION RECIEVED	12/07/2015
APPLICATION FEE PAID	12/08/2015
ASSIGNED DATE	12/08/2015

NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 009-00128
 Company: Sunoco Pipeline L.C.
 Printed: 12/08/2015
 Engineer: Williams, Jerry



Permit / Application Information Sheet
Division of Environmental Protection
West Virginia Office of Air Quality

Company:	Sunoco Pipeline L.C.		Facility:	Follansbee Station	
Region:	1	Plant ID:	009-00128	Application #:	13-3284
Engineer:	Williams, Jerry		Category:		
Physical Address:	376 White Tail Ridge Rd Wellsburg WV 26070		SIC: [4226] MOTOR FREIGHT TRANSPORTATION AND WAREHOUSING - SPECIAL WAREHOUSING & STORAGE NAICS: [493190] Other Warehousing and Storage		
County:	Brooke				
Other Parties:	Consultant - Plachy, Valerie 412-829-2610 ENGINEER - Gordon, Matthew 610-670-3284 ENV ENG - Embry, Christopher 610-670-3237				

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1. Need valid physical West Virginia address with zip
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Regulated Pollutants

Summary from this Permit 13-3284		
Air Programs	Applicable Regulations	
SIP	06 13 22	
Fee Program	Fee	Application Type
9M	\$1,000.00	CONSTRUCTION

Notes from Database
 Permit MM Note: Construction of a natural gas maintenance station consisting of product meters, control valves, filtration equipment, enclosed flare and associated piping.

Activity Dates	
APPLICATION RECIEVED	12/07/2015
APPLICATION FEE PAID	12/08/2015
ASSIGNED DATE	12/08/2015
APPLICANT PUBLISHED LEGAL AD	12/11/2015
ADDITIONAL INFO RECEIVED	12/15/2015
APPLICATION DEEMED COMPLETE	12/30/2015

NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 009-00128
 Company: Sunoco Pipeline L.C.
 Printed: 01/21/2016
 Engineer: Williams, Jerry

Engineer	Jerry Williams, P.E.
Email Address	jerry.williams@wv.gov
Company Name	Sunoco Pipeline, L.P.
Company ID	009-00128
Facility Name	Follansbee Station
Permit Number	R13-3284
County	Brooke
Newspaper	<i>The Brooke County Review</i>
Company Email and "Attention To:"	Matthew L. Gordon mlgordon@sunocologistics.com
Environmental Contact Email Address	Christopher Embry cpembry@sunocologistics.com
Regional Office (if applicable)	NPRO
New or Modified Source?	New
Construction, Modification, or Relocation?	Construction
Type of Facility	natural gas maintenance station
"Located" or "To Be Located"?	to be located
Place where I can find electronic versions of your notice, engineering evaluation, and draft permit	Q:\AIR_QUALITY\J_Willi\3284

AIR QUALITY PERMIT NOTICE

Notice of Intent to Approve

On December 7, 2015, Sunoco Pipeline, L.P. applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to construct and operate a natural gas maintenance facility located on Whitetail Ridge Road, Wellsburg, Brooke County, WV at latitude 40.235645 and longitude - 80.543506. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed facility. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-3284.

The following potential emissions will be authorized by this permit action: Particulate Matter less than 10 microns, <0.01 tons per year (TPY); Sulfur Dioxide, <0.01 TPY; Oxides of Nitrogen, 0.02 TPY; Carbon Monoxide, 0.11 TPY; Volatile Organic Compounds, 0.45 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on (Day of Week, Month, Day, Year). A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed construction will meet all state and federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Jerry Williams, P.E.
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Telephone: 304/926-0499, ext. 1223
FAX: 304/926-0478

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx



west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone (304) 926-0475 • FAX: (304) 926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-3284
Plant ID No.: 009-00128
Applicant: Sunoco Pipeline, L.P. (SPLP)
Facility Name: Follansbee Station
Location: Wellsburg, Brooke County
NAICS Code: 493190
Application Type: Construction
Received Date: December 7, 2015
Engineer Assigned: Jerry Williams, P.E.
Fee Amount: \$1,000.00
Date Received: December 7, 2015
Complete Date: December 30, 2015
Due Date: March 29, 2016
Applicant Ad Date: December 11, 2015
Newspaper: *The Brooke County Review*
UTM's: Easting: 538.832 km Northing: 4,454.012 km Zone: 17
Latitude: 40.235645
Longitude: -80.543506
Description: Construction of a natural gas maintenance station consisting of product meters, control valves, filtration equipment, enclosed flare and associated piping.

Promoting a healthy environment.

DESCRIPTION OF PROCESS

The following process description was taken from Permit Application R13-3284:

SPLP proposes to construct and operate a support maintenance station that will consist of product meters, control valves, filtration equipment, enclosed flare and associated piping. Products (e.g., propane and butane) will flow through the facility utilizing a single pipeline and connected to SPLP's ME2 pipeline.

The facility will result in added equipment and components to enhance the transportation of the NGLs through the pipeline, which consist of the following:

- One (1) gas chromatograph (GC)
- One (1) filter
- One (1) prover
- One (1) enclosed flare
- Miscellaneous fugitive equipment components

The specific emission sources consist of continuous emission sources, maintenance activity emissions, control equipment, fugitive dust emissions, and fugitive sources (e.g., leaks from valves, flanges, and other miscellaneous component types). The vapors associated with the GC, relief valves, and maintenance activities will be captured and directed to the enclosed flare for control of volatile organic compounds (VOCs). The following table provides a list of those sources:

Equipment	Rating/Size	Quantity
Continuous Emission Sources		
Gas Chromatograph	0.11 scf/hr	1
Relief Valves to Flare Header	0.002 scf/hr	9
Pilot Fuel	22 scf/hr	1
Maintenance Emission Sources		
Filter	49.48 ft ³	1
Prover	5.35 ft ³	1

The GC will be operated on a continuous basis sampling the NGLs in the pipeline for quality assurance/quality control (QA/QC) purposes. Vapors associated with the analysis of the NGLs will be captured and directed to an enclosed flare for control of VOCs.

The proposed enclosed flare will be a John Zink Company LLC 4 foot by 30 foot enclosed ZTOF Production Flare with a maximum heat input rating of 10 million British thermal units per hour (MMBTU/hr). The enclosed flare will be used to control VOC emissions associated with the GC and maintenance operations. The design destruction efficiency of the flare is 98% based upon the vendor's performance guarantee. Intermittent emissions will result from maintenance activities and these vapors will be captured and sent to the flare. Additional equipment associated with the enclosed flare will consist of an approximate 1,000 gallon propane storage tank, providing fuel for the pilot flame. The propane storage tank is pressurized.

During normal operation of the facility, emissions will be comprised of very minor emissions from the GC, pilot fuel and relief valve valve-seat emissions.

SITE INSPECTION

A site inspection was conducted on December 15, 2015 by Al Carducci of the DAQ Enforcement Section. According to Mr. Carducci, the site is appropriate for the facility.

Directions as given in the permit application are as follows:

From WV-88, turn onto McAdoo Ridge Road (1.6 miles). Turn left toward Whitetail Ridge. Take a slight right (0.4 miles) and continue right until reaching the station.



ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this facility consist of the continuous vapors captured from the operation of the GC, pilot fuel, and relief valves; vapors captured from maintenance activities that are associated with the filter, prover, and other maintenance activities that may occur; enclosed flare for controlling VOC emissions; fugitive dust emissions from an unpaved access road; and fugitive emissions resulting from leaks from valves, flanges, seals, relief valves and other miscellaneous component types. The vapors associated with the continuous emissions and maintenance activities will be captured and directed to the enclosed flare for control of VOC emissions.

The emission calculations are based on the facility operating 8,760 hours per year. The NGLs being sent through the system will consist of 17,000 barrels per day (BPD) of butane and 35,500 BPD of propane. Based on a representative analysis of each NGL; butane consists of 100% by weight VOCs and propane has an estimated VOC content of 98.6% by weight. The following table indicates the calculation methodology used for each piece of equipment:

Process Equipment	Calculation Methodology
Gas Chromatograph	Manufacturer's Data
Relief Valve Valve-Seats	USEPA's Protocol for Equipment Leak Emission Estimates and a representative NGL analysis
Maintenance Activities (Filter, Prover)	Engineering Estimate
Enclosed Flare	EPA AP-42 Emission Factors
Fugitive Emissions	USEPA's Protocol for Equipment Leak Emission Estimates and a representative NGL analysis
Haulroad Emissions	EPA AP-42 Emission Factors

The total facility PTE for the Follansbee Station is shown in the following table:

Pollutant	R13-3284 PTE (tons/year)
Nitrogen Oxides	0.02
Carbon Monoxide	0.11
Volatile Organic Compounds	0.45
Particulate Matter-10	<0.01
Sulfur Dioxide	<0.01
Total HAPs	<0.01
Carbon Dioxide Equivalent	51

Maximum detailed controlled point source emissions were calculated by SPLP and checked for accuracy by the writer and are summarized in the table on the next page.

Sunoco Pipeline, L.P. – Follansbee Station (R13-3284)

Emission Point ID#	Source	NO _x		CO		VOC		PM-10		SO ₂		Total HAPs lb/hr	CO ₂ e ton/year
		lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year		
F-9708	Enclosed Flare	0.68	0.02	3.12	0.11	9.48	0.26	<0.01	<0.01	0.03	<0.01	<0.01	51
Total Point Source		0.68	0.02	3.12	0.11	9.48	0.26	<0.01	<0.01	0.03	<0.01	<0.01	51
FE-01	Fugitives	0.00	0.00	0.00	0.00	0.04	0.19	0.00	0.00	0.00	0.00	<0.01	0
Fugitive	Dust	0.00	0.00	0.00	0.00	0.00	0.00	0.15	0.68	0.00	0.00	0.00	0
Total Fugitive		0.00	0.00	0.00	0.00	0.04	0.19	0.15	0.68	0.00	0.00	0.00	0
Total Site-wide		0.68	0.02	3.12	0.11	9.52	0.45	<0.01	<0.01	0.03	<0.01	<0.01	51

REGULATORY APPLICABILITY

The following rules apply to the facility:

45CSR6 (To Prevent and Control Air Pollution from the Combustion of Refuse)

The purpose of this rule is to prevent and control air pollution from combustion of refuse.

SPLP has one (1) flare at the facility. The flare is subject to section 4, emission standards for incinerators. The flare has negligible hourly particulate matter emissions. Therefore, the facility's flare should demonstrate compliance with this section. The facility will demonstrate compliance by maintaining records of the amount of natural gas consumed by the flare and the hours of operation. The facility will also monitor the flame of the flare and record any malfunctions that may cause no flame to be present during operation.

45CSR13 (Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation)

A 45CSR13 construction permit applies to this source due to the fact that the flare is subject to a substantive requirement under 45CSR6.

SPLP paid the appropriate application fee and published the required legal advertisement for a construction permit application.

45CSR22 (Air Quality Management Fee Program)

SPLP is not subject to 45CSR30. SPLP is required to pay the appropriate annual fees and keep their Certificate to Operate current.

The following rules do not apply to the facility:

45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants)

45CSR19 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment)

The Follansbee Station is located in Brooke County, which is an attainment county for all criteria pollutants, therefore the Follansbee Station is not applicable to 45CSR19.

As shown in the following table, SPLP is not a major source subject to 45CSR14 or 45CSR19 review. According to 45CSR14 Section 2.43.e, fugitive emissions are not included in the major source determination because it is not listed as one of the source categories in Table 1. Therefore, the fugitive emissions are not included in the PTE below.

Pollutant	PSD (45CSR14) Threshold (tpy)	NANSR (45CSR19) Threshold (tpy)	Follansbee PTE (tpy)	45CSR14 or 45CSR19 Review Required?
Carbon Monoxide	250	NA	0.11	No
Nitrogen Oxides	250	NA	0.02	No
Sulfur Dioxide	250	NA	<0.01	No
Particulate Matter 2.5	250	NA	<0.01	No
Ozone (VOC)	250	NA	0.45	No

40CFR60 Subpart Kb (Standards of Performance for VOC Liquid Storage Vessels)

40CFR60 Subpart Kb does not apply to storage vessels with a capacity less than 75 cubic meters. The largest tank that SPLP has proposed to install is 2.58 cubic meters. Therefore, SPLP would not be subject to this rule.

40CFR60 Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution)

EPA published in the Federal Register new source performance standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. 40CFR60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO₂) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The Follansbee Station does not have any equipment that is considered an affected facility under this rule.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

There will be small amounts of various non-criteria regulated pollutants emitted from the combustion of natural gas. However, due to the concentrations emitted, detailed toxicological information is not included in this evaluation.

All HAPs have other non-carcinogenic chronic and acute effects. These adverse health effects may be associated with a wide range of ambient concentrations and exposure times and are influenced by source-specific characteristics such as emission rates and local meteorological conditions. Health impacts are also dependent on multiple factors that affect variability in humans such as genetics, age, health status (e.g., the presence of pre-existing disease) and lifestyle. As stated previously, *there are no federal or state ambient air quality standards for these specific chemicals*. For a complete discussion of the known health effects of each compound refer to the IRIS database located at www.epa.gov/iris.

AIR QUALITY IMPACT ANALYSIS

Modeling was not required of this source due to the fact that the facility is not subject to 45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants) as seen in the table listed in the Regulatory Discussion Section.

SOURCE AGGREGATION

“Building, structure, facility, or installation” is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person.

The Follansbee Station is located in Brooke County and will be operated by SPLP.

1. The Follansbee Station will operate under SIC code 4922 (Pipeline Transportation of Natural Gas). There are other compressor stations operated by SPLP that share the same two-digit major SIC code of 49 for natural gas transmission. Therefore, the Follansbee Station does share the same SIC code as other SPLP compressor stations.
2. “Contiguous or Adjacent” determinations are made on a case by case basis. These determinations are proximity based, and it is important to focus on this and whether or not it meets the common sense notion of a plant. The terms “contiguous” or “adjacent” are not defined by USEPA. Contiguous has a dictionary definition of being in actual contact; touching along a boundary or at a point. Adjacent has a dictionary definition of not distant; nearby; having a common endpoint or border.

There are no SPLP properties in question that are considered to be on contiguous or adjacent property with the Follansbee Station.

3. Common control. SPLP does not own or operate any other facilities in West Virginia.

Because the facility is not under common control or considered to be on contiguous or adjacent properties with another facility, the emissions from the Follansbee Station should not be aggregated with other facilities in determining major source or PSD status.

MONITORING OF OPERATIONS

SPLP will be required to perform the following monitoring:

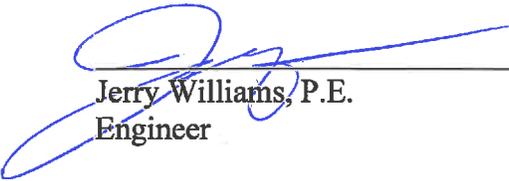
- Monitor and record quantity of NGL throughput.
- Monitor the presence of the flare pilot flame with a thermocouple or equivalent.

SPLP will be required to perform the following recordkeeping:

- Maintain records of the amount of NGL throughput.
- Maintain records of testing conducted in accordance with the permit. Said records shall be maintained on-site or in a readily accessible off-site location
- Maintain the corresponding records specified by the on-going monitoring requirements of and testing requirements of the permit.
- Maintain records of the visible emission opacity tests conducted per the permit.
- Maintain records of the flare design evaluation.
- The records shall be maintained on site or in a readily available off-site location maintained by SPLP for a period of five (5) years.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that SPLP meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Follansbee Station should be granted a 45CSR13 construction permit for their facility.



Jerry Williams, P.E.
Engineer

JAN 21, 2016

Date

West Virginia Department of Environmental Protection
Earl Ray Tomblin
Governor

Division of Air Quality

Randy C. Huffman
Cabinet Secretary

Permit to Construct



R13- 3284

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Sunoco Pipeline, L.P.
Follansbee Station
009-00128

William F. Durham
Director

Issued: Draft

Facility Location: Whitetail Ridge, Wellsburg, Brooke County, West Virginia
Mailing Address: 535 Fritztown Road, Sinking Spring, PA 19608
Facility Description: Natural gas maintenance station
NAICS Codes: 493190
UTM Coordinates: 538.832 km Easting • 4,454.012 km Northing • Zone 17
Permit Type: Construction
Description of Change: Construction of a natural gas maintenance station consisting of product meters, control valves, filtration equipment, enclosed flare and associated piping.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

The source is not subject to 45CSR30.

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1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
F-9708	F-9708	John Zink Enclosed Flare	2016	10 MMBTU/hr	NA
GC	F-9708	Gas Chromatograph	2016	0.11 scf/hr	F-9708
Filter	F-9708	Filter	2016	49.48 ft ³	F-9708
Prover	F-9708	Prover	2016	5.35 ft ³	F-9708
Relief	F-9708	Relief Valves	2016	0.002 scf/hr	F-9708
TK-9708	TK-9708	Propane Tank	2016	1,000 gal	None
TK-9702	TK-9702	Flare Knockout Tank	2016	3,000 gal	None

1.1. Control Devices

Emission Unit	Pollutant	Control Device	Control Efficiency
GC, Filter, Prover, Relief Valves	Volatile Organic Compounds	Enclosed Flare (F-9708)	98 %
	Hazardous Air Pollutants		98 %

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the “West Virginia Air Pollution Control Act” or the “Air Pollution Control Act” mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The “Clean Air Act” means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. “Secretary” means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary’s designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5 µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	Pph	Pounds per Hour
DAQ	Division of Air Quality	Ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per Million by Volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	Psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia air pollution control law W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Applications R13-3284 and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and -10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-4.]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.
[45CSR§13-5.4.]

2.10 Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.
[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by

improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1] *[State Enforceable Only]*
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved]

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling

connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;
 2. The result of the test for each permit or rule condition; and,
 3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State Enforceable Only.*]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:
Director
WVDEP
Division of Air Quality
601 57th Street
Charleston, WV 25304-2345

If to the US EPA:
Associate Director
Office of Air Enforcement and Compliance
Assistance
(3AP20)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a

Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

- 3.5.4.2. In accordance with 45CSR22 – Air Quality Management Fee Program, enclosed with this permit is an Application for a Certificate to Operate (CTO). The CTO will cover the time period beginning with the date of initial startup through the following June 30. Said application and the appropriate fee shall be submitted to this office prior to the date of initial startup. For any startup date other than July 1, the permittee shall pay a fee or prorated fee in accordance with Section 4.5 of 45CSR22. A copy of this schedule may be found on the reverse side of the CTO application.
- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

- 4.1.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- The date, place as defined in this permit, and time of sampling or measurements;
 - The date(s) analyses were performed;
 - The company or entity that performed the analyses;
 - The analytical techniques or methods used;
 - The results of the analyses; and
 - The operating conditions existing at the time of sampling or measurement.
- 4.1.2. **Minor Source of Hazardous Air Pollutants (HAP).** HAP emissions from the facility shall be less than 10 tons/year of any single HAP or 25 tons/year of any combination of HAPs. Compliance with this Section shall ensure that the facility is a minor HAP source.
- 4.1.3. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]
- 4.1.4. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- The equipment involved.
 - Steps taken to minimize emissions during the event.
 - The duration of the event.
 - The estimated increase in emissions during the event.
- For each such case associated with an equipment malfunction, the additional information shall also be recorded:
- The cause of the malfunction.
 - Steps taken to correct the malfunction.
 - Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.
- 4.1.5. Only those emission units/sources as identified in Table 1.0, with the exception of any *de minimis* sources as identified under Table 45-13B of 45CSR13, are authorized at the permitted facility.
- 4.1.6. The permittee shall install, maintain, and operate all above-ground piping, valves, pumps, etc. that service lines in the transport of potential sources of regulated air pollutants to minimize any fugitive escape of regulated air pollutants (leak). Any above-ground piping, valves, pumps, etc. that shows signs of excess wear and that have a reasonable potential for fugitive emissions of regulated air pollutants shall be replaced.

- 4.1.7. The permittee shall monitor and maintain quarterly records (calendar year) for each facility component that was inspected for fugitive escape of regulated air pollutants. Each component shall operate with no detectable emissions, as determined using audio-visual-olfactory (AVO) inspections, USEPA 40CFR60 Method 21, USEPA alternative work practice to detect leaks from equipment using optical gas imaging (OGI) camera (ex. FLIR camera), or some combination thereof. AVO inspections shall include, but not limited to, defects as visible cracks, holes, or gaps in piping; loose connections; liquid leaks; or broken or missing caps or other closure devices. If permittee uses USEPA Method 21, then no detectable emissions is defined as less than 500 ppm in accordance with Method 21. If permittee uses an OGI camera, then no detectable emissions is defined as no visible leaks detected in accordance with USEPA alternative OGI work practices.

If any leak is detected, the permittee shall repair the leak as soon as possible. The first attempt at repair must be made within five (5) calendar days of discovering the leak, and the final repair must be made within fifteen (15) calendar days of discovering the leak. The permittee shall record each leak detected and the associated repair. The leak will not be considered repaired until the same monitoring method or a more detailed instrument determines the leak is repaired.

Delay of repair of a closed vent system for which leaks or defects have been detected is allowed if the repair is technically infeasible without a shutdown, or if you determine that emissions resulting from immediate repair would be greater than the fugitive emissions likely to result from delay of repair. You must complete repair of such equipment by the end of the next shutdown.
[45CSR§13-5.11.]

5.0. Source-Specific Hazardous Air Pollutant Requirements (Enclosed Flare (F-9708))

5.1. Limitations and Standards

5.1.1. **Maximum Throughput Limitation.** The maximum natural gas liquids (NGLs) throughput shall not exceed 17,000 barrels per day of butane and 35,500 barrels per day of propane. Compliance with the Maximum Throughput Limitation shall be determined using a twelve month rolling total. A twelve month rolling total shall mean the sum of the monthly throughput at any given time during the previous twelve consecutive calendar months.

5.1.2. Maximum emissions from the flare (F-9708) shall not exceed the following limits:

Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (ton/year)
Volatile Organic Compounds	9.48	0.26

5.1.3. The flare subject to this section shall be designed and operated in accordance with the following:

- a. Flare shall be non-assisted.
- b. Flare shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours.
- c. Flare shall be operated, with a flame present at all times whenever emissions may be vented to them, except during SSM (Startup, Shutdown, Malfunctions) events.
- d. A flare shall be used only where the net heating value of the gas being combusted is 11.2 MJ/scm (300 Btu/scf) or greater if the flare is steam-assisted or air-assisted; or where the net heating value of the gas being combusted is 7.45 MJ/scm (200 Btu/scf) or greater if the flare is non-assisted. The net heating value of the gas being combusted in a flare shall be calculated using the following equation:

$$H_T = K \sum_{i=1}^n C_i H_i$$

Where:

H_T =Net heating value of the sample, MJ/scm; where the net enthalpy per mole of off gas is based on combustion at 25 °C and 760 mm Hg, but the standard temperature for determining the volume corresponding to one mole is 20 °C.

K=Constant=

$$1.740 \times 10^{-7} \left(\frac{1}{ppmv} \right) \left(\frac{\text{g-mole}}{\text{scm}} \right) \left(\frac{\text{MJ}}{\text{kcal}} \right)$$

where the standard temperature for (g-mole/scm) is 20 °C.

C_i =Concentration of sample component i in ppmv on a wet basis, which may be measured for organics by Test Method 18, but is not required to be measured using Method 18 (unless designated by the Director).

H_i =Net heat of combustion of sample component i, kcal/g-mole at 25 °C and 760 mm Hg. The heats of combustion may be determined using ASTM D2382-76 or 88 or D4809-95 if published values are not available or cannot be calculated.

n=Number of sample components.

- e. Nonassisted flares shall be designed for and operated with an exit velocity less than 18.3 m/sec (60 ft/sec), except as provided by 5.1.3.f and 5.1.3.g of this section. The actual exit velocity of a flare shall be determined by dividing by the volumetric flow rate of gas being combusted (in units of emission standard temperature and pressure), by the unobstructed (free) cross-sectional area of the flare tip, which may be determined by Test Method 2, 2A, 2C, or 2D in appendix A to 40 CFR part 60, as appropriate, but is not required to be determined using these Methods (unless designated by the Director).
- f. Nonassisted flares designed for and operated with an exit velocity, as determined by the method specified in 5.1.3.e. of this section, equal to or greater than 18.3 m/sec (60 ft/sec) but less than 122 m/sec (400 ft/sec), are allowed if the net heating value of the gas being combusted is greater than 37.3 MJ/scm (1,000 Btu/scf).
- g. Nonassisted flares designed for and operated with an exit velocity, as determined by the method specified in 5.1.3.e. of this section, less than the velocity V_{max} , as determined by the calculation specified in this paragraph, but less than 122 m/sec (400 ft/sec) are allowed. The maximum permitted velocity, V_{max} , for flares complying with this paragraph shall be determined by the following equation:

$$\text{Log}_{10}(V_{max})=(H_T+28.8)/31.7$$

Where:

V_{max} =Maximum permitted velocity, m/sec.

28.8=Constant.

31.7=Constant.

H_T =The net heating value as determined in 5.1.3.d of this section

- 5.1.4. The permittee is not required to conduct a flare compliance assessment for concentration of sample (i.e. Method 18) and tip velocity (i.e. Method 2) until such time as the Director requests a flare compliance assessment to be conducted in accordance with section 5.3.2, but the permittee is required to conduct a flare design evaluation in accordance with section 5.4.2. Alternatively, the permittee may elect to demonstrate compliance with the flare design criteria requirements of section 5.1.3 by complying with the compliance assessment testing requirements of section 5.3.2.

5.2. Monitoring Requirements

- 5.2.1. In order to demonstrate compliance with the requirements of 5.1.3.c, the permittee shall monitor the presence or absence of a flare pilot flame using a thermocouple or any other equivalent device, except during SSM events.
- 5.2.2. The permittee shall monitor the throughput of butane and propane on a monthly basis.

5.3. Testing Requirements

- 5.3.1. In order to demonstrate compliance with the flare opacity requirements of 5.1.3.b the permittee shall conduct a Method 22 opacity test for at least two hours. This test shall demonstrate no visible emissions are observed for more than a total of 5 minutes during any 2 consecutive hour period using 40CFR60 Appendix A Method 22. The permittee shall conduct this test within one (1) year of permit issuance or initial startup whichever is later. The visible emission checks shall determine the presence or absence of visible emissions. At a minimum, the observer must be trained and knowledgeable regarding the effects of background contrast, ambient lighting, observer position relative to lighting, wind, and the presence of uncombined water (condensing water vapor) on the visibility of emissions. This training may be obtained from written materials found in the References 1 and 2 from 40 CFR part 60, appendix A, Method 22 or from the lecture portion of 40 CFR part 60, appendix A, Method 9 certification course.

- 5.3.2. The Director may require the permittee to conduct a flare compliance assessment to demonstrate compliance with section 5.1.3. This compliance assessment testing shall be conducted in accordance with Test Method 18 for organics and Test Method 2, 2A, 2C, or 2D in appendix A to 40 CFR part 60, as appropriate, or other equivalent testing approved in writing by the Director. Also, Test Method 18 may require the permittee to conduct Test Method 4 in conjunction with Test Method 18.
- 5.3.3. In order to demonstrate compliance with the minor source status of hazardous air pollutants required by 4.1.2, upon request of the Director, the permittee shall demonstrate compliance with the HAP emissions thresholds using GLYCalc Version 3.0 or higher. The permittee shall sample in accordance with GPA Method 2166 and analyze the samples utilizing the extended GPA Method 2286 as specified in the GRI-GLYCalc V4 Technical Reference User Manual and Handbook.

5.4. Recordkeeping Requirements

- 5.4.1. For the purpose of demonstrating compliance with section 5.1.3.c and 5.2.1, the permittee shall maintain records of the times and duration of all periods which the pilot flame was absent.
- 5.4.2. For the purpose of demonstrating compliance with section 5.1.4 and 5.3.2, the permittee shall maintain a record of the flare design evaluation. The flare design evaluation shall include, net heat value calculations, exit (tip) velocity calculations, and all supporting concentration calculations and other related information requested by the Director.
- 5.4.3. For the purpose of demonstrating compliance with the requirements set forth in sections 5.1.3 and 5.3.3., the permittee shall maintain records of testing conducted in accordance with 5.3.3.
- 5.4.4. The permittee shall document and maintain the corresponding records specified by the on-going monitoring requirements of 5.2 and testing requirements of 5.3.
- 5.4.5. For the purpose of demonstrating compliance with section 5.1.3.b, the permittee shall maintain records of the visible emission opacity tests conducted per Section 5.3.1.
- 5.4.6. For the purpose of demonstrating compliance with the minor source status of hazardous air pollutants required by section 4.1.2, the permittee shall maintain a record of all potential to emit (PTE) HAP calculations for the entire affected facility. These records shall include the natural gas compressor engines and ancillary equipment.
- 5.4.7. The permittee shall maintain a record of the propane and butane throughput to demonstrate compliance with section 5.1.1.
- 5.4.8. All records required under Section 5.4 shall be maintained on site or in a readily accessible off-site location maintained by the permittee for a period of five (5) years. Said records shall be readily available to the Director of the Division of Air Quality or his/her duly authorized representative for expeditious inspection and review. Any records submitted to the agency pursuant to a requirement of this permit or upon request by the Director shall be certified by a responsible official.

5.5. Reporting Requirements

- 5.5.1 If permittee is required by the Director to demonstrate compliance with section 5.3.3, then the permittee shall submit a testing protocol at least thirty (30) days prior to testing and shall submit a notification of the testing date at least fifteen (15) days prior to testing. The permittee shall submit the testing results within sixty (60) days of testing and provide all supporting calculations and testing data.
- 5.5.2. Any deviation(s) from the allowable visible emission requirement for any emission source discovered during observations using 40CFR Part 60, Appendix A, Method 9 or 22 shall be reported in writing to the Director of the Division of Air Quality as soon as practicable, but in any case within ten (10) calendar days of the occurrence and shall include at least the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.
- 5.5.3. Any deviation(s) from the flare design and operation criteria in Section 5.1.3 shall be reported in writing to the Director of the Division of Air Quality as soon as practicable, but in any case within ten (10) calendar days of discovery of such deviation.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹ _____ Date _____
(please use blue ink) Responsible Official or Authorized Representative

Name & Title _____
(please print or type) Name Title

Telephone No. _____ Fax No. _____

¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.

Williams, Jerry

From: Williams, Jerry
Sent: Wednesday, December 30, 2015 9:26 AM
To: 'mlgordon@sunocologistics.com'
Cc: McKeone, Beverly D; 'cpembry@sunocologistics.com'; 'valerie.plachy@tetrattech.com'; 'megan.allison@tetrattech.com'
Subject: WV DAQ NSR Permit Application Complete for Sunoco Pipeline, L.P. - Follansbee Station

**RE: Application Status: Complete
Sunoco Pipeline, L.P. - Follansbee Station
Permit Application R13-3284
Plant ID No. 009-00128**

Mr. Gordon,

Your application for a construction permit for a natural gas maintenance station was received by this Division on December 7, 2015 and assigned to the writer for review. Upon review of said application, it has been determined that the application is complete and, therefore, the statutory review period commenced on December 30, 2015.

In the case of this application, the agency believes it will take approximately 90 days to make a final permit determination.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact Jerry Williams at (304) 926-0499 ext. 1223 or reply to this email.

Jerry Williams, P.E.
Engineer
WVDEP – Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
(304) 926-0499 ext. 1223
jerry.williams@wv.gov

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 Please consider the environment before printing this email.

Williams, Jerry

From: Allison, Megan <Megan.Allison@tetrattech.com>
Sent: Tuesday, December 15, 2015 3:04 PM
To: Williams, Jerry
Cc: WERNER, JED A (JAWERNER@sunocologistics.com); Chris Embry (CPEMBRY@sunocologistics.com); Plachy, Valerie; OBradovich, Anne
Subject: Follansbee Station Administrative Completeness Review Responses - Plant ID No. 009-00128, Application No. R13-3284
Attachments: Mariner East Pipeline-MG.PDF

Mr. Williams:

In response to the telephone conversation on December 14, 2015 requesting additional information in support of your administrative completeness evaluation, Tetra Tech has conferred with the client to provide the requested information below.

First, regarding the NAICS Code selection, the client believes that NAICS Code 493190 (Other Warehousing and Storage) rather than 213112 (Support Activities for Oil and Gas Operations) is the appropriate code for the proposed Follansbee Station for the following reasons:

- 213112 is associated with Oil and Gas upstream operations closely associated with natural gas exploration and production activities, while the Follansbee Station will engage in midstream activities associated with the transportation and bulk storage of liquefied petroleum gases (LPGs), a petroleum product.
- The Follansbee Station will not engage in natural gas exploration and production related activities such as compression, drilling, pumping of natural gas, or hydraulic fracturing.

Secondly, attached to this email is the documentation verifying that Mr. Matthew L. Gordon, Principal Engineer, is the "Responsible official" as detailed 40CSR 13 Chapter 22.22d associated with governmental air agency activities for the Sunoco Pipeline L.P. Mariner East Pipeline Project.

As an additional clarification to our telephone conversation, while there are no pumps planned for the proposed Follansbee Station, the filters proposed to be installed prevent debris from entering the electric mainline pumps and electric booster pumps at other stations serving the pipeline.

Please contact me with any further questions.

Regards,
Megan Allison

Megan Anne Allison, MPH, CPH | Project Scientist
Office: 412-829-3612 | Cell: 724-859-0451 | Fax: 412-829-3620
Tetra Tech, Inc. | Appalachian Basin Oil & Gas Services
400 Penn Center Boulevard, Suite 200 | Pittsburgh, PA 15235
www.tetrattech.com | megan.allison@tetrattech.com

ID # 009-00128
Reg R13-3284
Company SUNOCO PIPELINE
Facility FOLLANSBEE Initials MA

 Live Green, Work Green, Save Green, Think Green

PLEASE NOTE: This message, including any attachments, may include privileged, confidential and/or inside information. Any distribution or use of this communication by anyone other than the intended recipient is strictly prohibited and may be unlawful. If you are not the intended recipient, please notify the sender by replying to this message and then delete it from your system.

Delegated Individual: Matthew L. Gordon, Principal Engineer
Project: Sunoco Pipeline L.P. – Mariner East Pipeline

I, David R. Chalson, Vice President of Sunoco Logistics Partners Operations GP LLC, the General Partner of Sunoco Pipeline L.P. hereby delegate to the above listed individual, authority to sign air quality permit applications and reports, that are submitted to government agencies regarding operations for the Mariner East Pipeline Project. Such government agencies include, but are not limited to, the Pennsylvania Department of Environmental Protection and the U. S. Environmental Protection Agency.



David R. Chalson
Vice President
Sunoco Logistics Partners Operations GP
LLC

(air)

Delegated Individual: Matthew L. Gordon, Principal Engineer
Project: Sunoco Pipeline L.P. – Mariner East Pipeline

I, David R. Chalson, Vice President of Sunoco Logistics Partners Operations GP LLC, the General Partner of Sunoco Pipeline L.P. hereby delegate to the above listed individual, authority to sign water quality permit applications and reports including Discharge Monitoring Reports that are submitted to government agencies regarding operations for the Mariner East Pipeline Project. Such government agencies include, but are not limited to, the Pennsylvania Department of Environmental Protection and the U. S. Environmental Protection Agency.



David R. Chalson
Vice President
Sunoco Logistics Partners Operations GP LLC

(water)



TETRA TECH



December 14, 2015

FedEx Tracking No. 7751 9923 2577

Mr. Jerry Williams
Program Manager, New Source Review Permitting
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street Southeast
Charleston, West Virginia 25304

Subject: Application for New Source Review (NSR)
NSR (45CSR13) Construction Permit Application
Wellsburg, Brooke County, West Virginia
Tetra Tech, Inc. Project No. 112IC05958

RE: Application Original Affidavit
Sunoco Pipeline L.C.
Follansbee Station
Plant ID No. 009-00128
Application No. R13-3284

Dear Mr. Williams:

In response to your December 8, 2015 email to Mr. Matthew Gordon, enclosed please find the original application affidavit, two (2) copies of the application affidavit, and two (2) compact discs (CDs) that contain a Portable Document Format (PDF) version of Application No. R13-3284.

Please contact either Ms. Valerie J. Plachy, P.E. (valerie.plachy@tetrattech.com) at (412) 829-2610 or Ms. Megan Allison (megan.allison@tetrattech.com) at (412) 829-3612 with any questions regarding the subject application.

Sincerely,

Valerie J. Plachy, P.E.
Senior Environmental/Project Engineer

cc: Project file 112IC05958 (electronic)
Jed Werner, SPLP (email)
Christopher Embry, SPLP (email)
Megan Allison, Tetra Tech (email)
TR Andrade, Tetra Tech (email)

ID # 009-00128
Reg R13-3284
Company SUNOCO PIPELINE
Facility FOLLANSBEE Initials AV

VJP:vjp/maa

Enclosures:
Original Affidavit
Two (2) copies of Affidavit from the Brooke County Review
2 CD of Application R13-3284

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**CERTIFICATE
OF
PUBLICATION**
The Brooke County Review
Brooke County
Wellsburg, West Virginia

I, Jonathan M. McGoldrick, general manager of the Brooke County Review, a newspaper of general circulation in Brooke County, West Virginia, published in Wellsburg, hereby Certify that the attached advertisement was duly published in said Newspaper for 1 successive week(s) in issues of

12/11/15

Given under my hand this 11th day of December 2015

Jonathan M. McGoldrick
General Manager of the Brooke County Review

Printer's Fee \$ 73.80

Invoice # 1940

Subscribed and sworn to this 11th day of Dec, 2015

Dorothy Craig
Notary Public



My commission expires March 16, 2020

**AIR QUALITY PERMIT NOTICE
Notice of Application**

Notice is given that Sunoco Pipeline, L.P. has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Construction Permit for a Pipeline Station located on 376 White Tail Ridge Rd., Wellsburg, in Brooke County, West Virginia. The latitude and longitude coordinates are: Latitude 40° 14' 8.3364"N, Longitude -80° 32' 36.5922"W.

The applicant estimates the potential to discharge the following Regulated Air Pollutants will be: 0.45 tons per year (tpy) of Volatile Organic Compounds (VOCs), 0.0002 tpy, Hazardous Air Pollutants (HAPs), 0.02 tpy of Oxides of Nitrogen (NOX), 0.11 tpy of Carbon Monoxide (CO), 50.5 tpy of Carbon Dioxide Equivalent (CO2-e), 0.002 tpy of Oxides of Sulfur, and 0.60 tpy Particulate Matter (PM), and 0.27 tpy PM less than 10 microns (PM10).

Startup of operation is planned to begin on or about the 29 day of September, 2016. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1250, during normal business hours.

Dated this the 11th day of December, 2015.

By: Sunoco Pipeline, L.P.
Matthew L. Gordon
Principle Engineer
535 Fritztown Road
Sinking Spring, PA 19608

BCR 12/11/15

Williams, Jerry

From: Carducci, Alfred A
Sent: Tuesday, December 15, 2015 2:40 PM
To: Williams, Jerry
Subject: RE: Site Inspection Request
Attachments: Barn and Residence.JPG; Cow and Roosters.JPG; Site.JPG; Farm Equipment.JPG

Hi Jerry:

Sunoco Pipeline (SPLP) Follansbee Station (R13-3284 ID#009-00128). The site is surrounded by farmland and open fields. The closest residences, which there are (2), to the middle of the site are between 800 to 1000 feet away. There are farm animals walking near the site, but I am assuming the land owner will move them when construction begins.

Pictures are attached.

Alfred Carducci

Environmental Resource Specialist 3
West Virginia Department of Environmental Protection
Northern Panhandle Regional Office

ID # 009-00128
Reg R13-3284
Company SUNOCO PIPELINE
Facility FOLLANSBEE Initials J

From: Williams, Jerry
Sent: Monday, December 14, 2015 9:15 AM
To: Carducci, Alfred A
Subject: Site Inspection Request

Al,

Could you do a site inspection for me? It is for Sunoco Pipeline (SPLP) Follansbee Station (R13-3284 ID#009-00128).

Easting: 538.832 km Northing: 4,454.012 km Zone: 17
Latitude: 40.235645
Longitude: -80.543506

Directions as given in the permit application are as follows:

From WV-88, turn onto McAdoo Ridge Road (1.6 miles). Turn left toward Whitetail Ridge. Take a slight right (0.4 miles) and continue right until reaching the station.

The following process description was taken from Permit Application R13-3284:

SPLP proposes to construct and operate a support maintenance station that will consist of product meters, control valves, filtration equipment, enclosed flare and associated piping. Products (e.g., propane and butane) will flow through the facility utilizing a single pipeline and connected to SPLP's ME2 pipeline.

The facility will result in added equipment and components to enhance the transportation of the NGLs through the pipeline, which consist of the following:

- One (1) gas chromatograph (GC)
- One (1) filter
- One (1) prover

- One (1) enclosed flare
- Miscellaneous fugitive equipment components

The specific emission sources consist of continuous emission sources, maintenance activity emissions, control equipment, fugitive dust emissions, and fugitive sources (e.g., leaks from valves, flanges, and other miscellaneous component types). The vapors associated with the GC, relief valves, and maintenance activities will be captured and directed to the enclosed flare for control of volatile organic compounds (VOCs). The following table provides a list of those sources:

Equipment	Rating/Size	Quantity
Continuous Emission Sources		
Gas Chromatograph	0.11 scf/hr	1
Relief Valves to Flare Header	0.002 scf/hr	9
Pilot Fuel	22 scf/hr	1
Maintenance Emission Sources		
Filter	49.48 ft ³	1
Prover	5.35 ft ³	1

The GC will be operated on a continuous basis sampling the NGLs in the pipeline for quality assurance/quality control (QA/QC) purposes. Vapors associated with the analysis of the NGLs will be captured and directed to an enclosed flare for control of VOCs.

The proposed enclosed flare will be a John Zink Company LLC 4 foot by 30 foot enclosed ZTOF Production Flare with a maximum heat input rating of 10 million British thermal units per hour (MMBTU/hr). The enclosed flare will be used to control VOC emissions associated with the GC and maintenance operations. The design destruction efficiency of the flare is 98% based upon the vendor's performance guarantee. Intermittent emissions will result from maintenance activities and these vapors will be captured and sent to the flare. Additional equipment associated with the enclosed flare will consist of an approximate 1,000 gallon propane storage tank, providing fuel for the pilot flame. The propane storage tank is pressurized.

During normal operation of the facility, emissions will be comprised of very minor emissions from the GC, pilot fuel and relief valve valve-seat emissions.

Please let me know if you can do this or if you have additional questions.

Thanks,
Jerry

Jerry Williams, P.E.
Engineer
WVDEP – Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
(304) 926-0499 ext. 1223
jerry.williams@wv.gov



 Please consider the environment before printing this email.

Williams, Jerry

From: Ward, Beth A
Sent: Wednesday, December 09, 2015 9:29 AM
To: Williams, Jerry
Subject: SUNOCO PIPELINE LC PERMIT APPLICATION FEE

This is the receipt for payment received from:

SUNOCO PIPELINE LC, FOLLANSBEE STATION, CHECK NUMBER 410003286, CHECK DATE 10/02/2015, \$1000.00
R13-3284 ID# 009-00128

OASIS Deposit CR 1600063321

Thank You!

Beth Ward

**WV DEPARTMENT OF ENVIRONMENTAL PROTECTION
BTO FISCAL
601 57TH STREET SE
CHARLESTON, WV 25304
(304) 926-0499 EXT 1846
beth.a.ward@wv.gov**

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TETRA TECH



December 4, 2015

FedEx Tracking No. 7751 1591 6463

Ms. Beverly McKeone
Program Manager, New Source Review Permitting
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street Southeast
Charleston, West Virginia 25304

Subject: Application for New Source Review (NSR)
NSR (45CSR13) Construction Permit Application
Wellsburg, Brooke County, West Virginia
Tetra Tech, Inc. Project No. 112IC05958

ID # 109-00128
Reg R13-3284
Company SUNOCO PIPELINE
Facility FOLLANSBEE Initials hw

Dear Ms. McKeone:

With the letter, Sunoco Pipeline L.P. (SPLP) is submitting this NSR 45CSR13 Construction Permit Application for a proposed new facility along White Tail Ridge Road in Wellsburg, West Virginia. Please find enclosed three (3) copies of the permit application. The Public Notice is scheduled for publication in The Brooke County Review during the week of December 7, 2015.

BACKGROUND

SPLP is proposing to construct and operate a maintenance station in Brooke County, West Virginia identified as the Sunoco Pipeline Follansbee Station (the Facility). The Facility will consist of product meters, control valves, filtration equipment, an enclosed flare, and associated piping and accessory structures. The natural gas liquid (NGL) products (e.g., propane and butane) will flow through the Facility utilizing a single pipeline and interconnect with SPLP's Mariner East 2 (ME2) Pipeline.

The proposed Facility will result in added equipment and components to enhance the transportation of the NGLs through the pipeline, which will generally consist of the following:

- One (1) gas chromatograph (GC);
- One (1) filter;
- One (1) prover;
- One (1) enclosed flare; and
- Miscellaneous fugitive equipment components.

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The specific emission sources identified for the proposed Facility will consist of continuous emission sources, maintenance activity emissions, control equipment, fugitive dust emissions, and fugitive sources (e.g., leaks from valves, flanges, and other miscellaneous component types). The vapors associated with the GC, relief valves, and maintenance activities will be captured and diverted to the enclosed flare for control of volatile organic compounds (VOCs).

EMISSION CALCULATIONS

The emissions associated with the proposed Facility were calculated in accordance with regulatory guidance and are based on the most representative data available. Emission from continuous, maintenance, and fugitive emission sources and control equipment were estimated. Continuous emission sources include a gas chromatograph, relief valve fugitive to the flare header, and flare pilot gas. Maintenance emission sources occur during activities where the evacuation of a filter and prover are vented to the flare. Fugitive emission sources include various component types with quantity counts based upon process and instrumentation drawings. Control equipment includes a 10 million British thermal unit per hour (MMBtu/hr) enclosed flare and a pilot gas propane storage tank.

- The continuous emissions that will be captured and directed to the enclosed flare are based on manufacturer's data and Table 2-3 of United States Environmental Protection Agency's (USEPA's) "Protocol for Equipment Leak Emission Estimates" for a representative NGL analysis.
- The emissions associated with maintenance activities are based on the anticipated frequency and volume of equipment venting and maintenance activities being sent to the enclosed flare.
- The combustion emissions from the enclosed flare are based on combusting the NGL vapors and the propane pilot gas and will consist of oxides of nitrogen (NOX), carbon monoxide (CO), VOCs, hazardous air pollutants (HAPs), sulfur dioxide (SO₂), and Greenhouse Gases (GHGs). The NOX and CO emissions were estimated based on emission factors presented in USEPA's AP-42 Section 13.5. The VOC emissions resulting from the control of the NGL vapors were estimated based on a 98% destruction and removal efficiency (DRE).
- Fugitive VOC emission sources from equipment, piping, and components (e.g., valves and flanges) were estimated based on the proposed Facility equipment and piping component item counts shown in the design Process and Instrumentation Diagrams (P&IDs) with a 10 percent (%) as-built item count contingency factor. The light liquid service fugitive leak emission factors presented in the Table 2-3 of USEPA "Protocol for Equipment Leak Emission Estimates" and a representative NGL analysis was used to estimate the fugitive emission rate and emission speciation.

REVIEW OF 45 CSR 13

WVDEP requires that new stationary sources of air emissions be permitted through its Rule 13 construction permitting program. The definition in Rule 13 states that a "stationary source" meets one of the following provisions:

- 2.24.a. *Is subject to any substantive requirement of an emission control rule promulgated by the Secretary;*
- 2.24.b. *Discharges or has the potential to discharge more than six (6) pounds per hour and ten (10) tons per year, or has the potential to discharge more than 144 pounds per calendar day, of any regulated air pollutant;*
- 2.24.c. *Discharges or has the potential to discharge more than two (2) pounds per hour or five (5) tons per year of hazardous air pollutants considered on an aggregated basis;*
- 2.24.d. *Discharges or has the potential to discharge any air pollutant(s) listed in Table 45 - 13A in the amounts shown in Table 45-13A or greater; or*
- 2.24.e. *An owner or operator voluntarily chooses to be subject to a construction or modification permit pursuant to this rule, even though not otherwise required to do so.*

Based on your guidance, SPLP is submitting a NSR Construction Permit Application for the Facility. Please direct your questions regarding the subject RFD to Ms. Valerie J. Plachy, P.E. (valerie.plachy@tetratech.com) at (412) 829-2610. Additionally, Ms. Megan Allison (megan.allison@tetratech.com) is available to facilitate any questions regarding the subject Rule 13 application at (412) 829-3612.

Thank you for your assistance in developing the subject NSR Construction Permit Application.

Sincerely,



Valerie J. Plachy, P.E.
Senior Environmental/Project Engineer

VJP:vjp/md

cc: Project file 112IC05958 (electronic)
Jed Werner, SPLP (email)
Christopher Embry, SPLP (email)
Megan Allison, Tetra Tech (email)
TR Andrade, Tetra Tech (email)

Enclosure: Rule 13 Application; Sunoco Follansbee Station

Adkins, Sandra K

From: Adkins, Sandra K
Sent: Tuesday, December 08, 2015 11:07 AM
To: 'mlgordon@sunocologistics.com'; 'cpembry@sunocologistics.com'
Cc: McKeone, Beverly D; Williams, Jerry
Subject: WV DAQ Permit Application Status for Sunoco Pipeline L.C.; Follasbee Station

**RE: Application Status
Sunoco Pipeline L.C.
Follansbee Station
Plant ID No. 009-00128
Application No. R13-3284**

Mr. Gordon,

Your application for a construction permit for the Follansbee Station was received by this Division on December 7, 2015, and was assigned to Jerry Williams. The following item was not included in the initial application submittal:

Original affidavit for Class I legal advertisement not submitted.

This item is necessary for the assigned permit writer to continue the 30-day completeness review.

Within 30 days, you should receive a letter from Jerry stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

For future reference, please submit one original application and two copies on CDs. Electronic versions must contain signatures.

Should you have any questions, please contact the assigned engineer, Jerry Williams, at 304-926-0499, extension 1223.

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Permit / Application Information Sheet
Division of Environmental Protection
West Virginia Office of Air Quality

Company:	Sunoco Pipeline L.C.	Facility:	Follansbee Station
Region:		Plant ID:	009-00128
Engineer:	Williams, Jerry	Application #:	13-3284
Physical Address:	376 White Tail Ridge Rd Wellsburg WV 26070	Category:	
County:		SIC: [4226] MOTOR FREIGHT TRANSPORTATION AND WAREHOUSING - SPECIAL WAREHOUSING & STORAGE NAICS: [493190] Other Warehousing and Storage	
Other Parties:	Consultant - Plachy, Valerie 412-829-2610 ENGINEER - Gordon, Matthew 610-670-3284 ENV ENG - Embry, Christopher 610-670-3237		

Information Needed for Database and AIRS
1. Need valid physical West Virginia address with zip
2. Air Program
3. Inspection result
4. Pollutant and class

Regulated Pollutants

Summary from this Permit 13-3284		Notes from Database
Air Programs	Applicable Regulations	
Fee Program	Fee	Application Type
	\$1,000.00	CONSTRUCTION

Activity Dates	
APPLICATION RECIEVED	12/07/2015
APPLICATION FEE PAID	12/08/2015
ASSIGNED DATE	12/08/2015

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Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 009-00128
 Company: Sunoco Pipeline L.C.
 Printed: 12/08/2015
 Engineer: Williams, Jerry