



west virginia department of environmental protection

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MEMORANDUM

To: Bev McKeone
From: Jerry Williams 
Date: July 19, 2016
Subject: R13-3102A, Enterprise TE Products Pipeline Company LLC (Enterprise) –
Dominion Interconnect (009-00123)

SUMMARY

Enterprise submitted R13-3102A on June 9, 2016. The application was incomplete as submitted and additional information was requested. After receipt of the requested information, the application was deemed complete on July 13, 2016.

Enterprise owns and operates the Dominion Interconnect to provide pipeline transportation of products to the ATEX Express Pipeline System. Enterprise was issued a permit to operate a maintenance flare at this location on October 28, 2013. The permit was for a maintenance flare to combust ethane product that must be evacuated from pipeline components during intermittent operations. The site also includes ancillary pipeline components. This Class II administrative update request is to allow the maintenance flare to also process propane products during this operation.

The total potential to emit (PTE) for Enterprise's Dominion Interconnect after this proposed administrative update are shown in the following table:

Pollutant	Maximum Pre-Modification Annual Facility Wide Emissions (tons/year)	Maximum Post-Modification Annual Facility Wide Emissions (tons/year)	Net Facility Wide Emissions Changes (tons/year)
Nitrogen Oxides	0.35	0.55	0.20
Carbon Monoxide	1.90	2.49	0.59
Volatile Organic Compounds	0.52	7.14	6.62
Particulate Matter-10/2.5	0.02	0.02	0
Sulfur Dioxide	0.02	0.02	0
Carbon Dioxide Equivalent	767	1,094	327

Combusting propane will be an infrequent operation. However, combusting propane at a maximum daily rate of 62,500 scf/day would result in daily VOC emissions of 142.70 lb/day. This is less than 144 lb/day which is the “modification” threshold under 45CSR13.

Changes to the permit include:

- Fugitive VOC emission monitoring. (Permit conditions 4.1.5 and 4.1.6)
- A daily operation limit when combusting propane in the flare. (Permit condition 5.1.4)
- Changes to the emission table to include the combustion of propane. (Permit condition 5.1.5)
- Propane throughput monitoring and recordkeeping. (Permit conditions 5.2.3 and 5.4.3)

45CSR13 Section 4.2.b states that a Class II administrative update includes changes in a permit condition as necessary to allow changes in operating parameters, emission points, control equipment or any other aspect of a source which results in an increase or no change in the emission of any existing regulated air pollutant or any new regulated air pollutant. Furthermore, 45CSR13 Section 2.17.f.5 states that use of an alternative fuel, provided that the source was designed to accommodate that fuel without increasing emissions above “modification” levels does not constitute a “modification”. Therefore, it is my opinion that this request qualifies for a Class II administrative update. Enterprise published the required Class I legal advertisement in *The Weirton Daily Times* on June 13, 2016.