
Rule 13 Guidance for Natural Gas Combustion Sources

Abstract

_____The following will outline new 45CSR13 (Rule 13) permit guidance for stationary sources that combust only pipeline quality natural gas for direct-fired (i.e. heaters) and in-direct fired (i.e. boilers) sources. The purpose of this guidance is to provide consistency among the permit engineers on how to evaluate these stationary sources for Rule 13.

The following guidance only addresses changes to the applicability for stationary sources that combust only pipeline quality natural gas and does not apply to natural gas compressor engines or flares. Also, these guidelines should not apply to sources being evaluated for synthetic minor permits for HAPs, PSD, and/or Title V. This guidance does not prevent the Division of Air Quality (DAQ) from making case-by-case determinations of stationary natural gas combustion sources. The DAQ reserves the right to evaluate all of these sources on a case-by-case basis.

Authority

DAQ's minor source permitting rule, Rule 13, sets forth the trigger thresholds and standards requiring a facility to obtain a Rule 13 permit.

Rule 13, Section 2, defines construction and modification as any physical change or change in the method of operation which "discharges (or results in an increase) 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".

The result of the above discretionary reading of 45CSR13 is to allow new and modified stationary sources that combust only pipeline quality natural gas to determine whether or not a Rule 13 permit is required and whether or not emission limits are needed for every regulated air pollutant.

Procedure

Under this guidance, a stationary source that combusts only pipeline quality natural gas would only be required to obtain a permit in accordance with the following standards:

Stationary Natural Gas Combustion Sources "Not Located at a Facility Major for HAPs"

- Sources **Less than 10 MMBtu/hr** would not require a permit. This would result in no emission limits for any regulated air pollutants. If other sources are being permitted, DAQ recommends the facility include these sources in the equipment list of their permit. This would help the facility and the DAQ with applicability of these sources.
- Sources **Between 10-30 MMBtu/hr** would not require a permit. This would result in no emission limits for any regulated air pollutants. If other sources are being permitted, DAQ recommends the facility include these sources in the equipment list of their permit. Also, for boilers subject to NSPS Subpart Dc, the DAQ recommends including: monthly fuel usage records, notification, reports, and etc. This would help the facility and the DAQ with applicability and requirements for these sources.

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- Sources **Between 30-61.2 MMBtu/hr** would not require a permit. This would result in no emission limits for any regulated air pollutants. If other sources are being permitted, DAQ recommends the facility include these sources in the equipment list of their permit. Also, for boilers subject to NSPS Subpart Dc, the DAQ recommends including: monthly fuel usage records, notification, reports, evaluate the new requirements for new or reconstructed sources, etc. This would help the facility and the DAQ with applicability and requirements for these sources.
- Sources **Between 61.2-100 MMBtu/hr** (Rule 13 trigger threshold 6 lb/hr & 10 ton/yr) would require a Rule 13 permit for NOx, CO, PM, and possibly HAPs. For sources with low NOx burners or with emissions data from sources other than AP-42, the DAQ will need to evaluate their trigger thresholds for permitting. For natural gas boilers subject to NSPS Subpart Dc, include the following requirements: monthly fuel usage records, notification, reporting, evaluate the new requirements for new or reconstructed sources, etc.
- Sources **Over 100 MMBtu/hr** would require a permit for NOx, CO, PM, and possibly HAPs. For sources with low NOx burners or with emissions data from sources other than AP-42, the DAQ will need to evaluate their trigger thresholds for permitting. For natural gas boilers subject to NSPS Subpart Db, include the following requirements: NOx and particulate matter emission limits and emission testing, NOx CEM required, monthly fuel usage records, notification and reporting requirements, etc.

Stationary Natural Gas Combustion Sources “Located at a Facility Major for HAPs”

- New or reconstructed sources **Between 10-100 MMBtu/hr** would require a permit (if subject to the MACT). Determine whether the source is subject to the requirements of MACT Subpart DDDDD. The following is a partial list of the major requirements of MACT Subpart DDDDD: carbon monoxide (CO) emission limit and testing, recordkeeping, reporting, etc. The criteria pollutants (except CO, because it is used in the MACT) should be evaluated in accordance with the above guidance for Stationary Natural Gas Combustion Sources “Not Located at a Facility Major for HAPs”
- New or reconstructed sources **Over 100 MMBtu/hr** would require a permit (if subject to the MACT). Determine whether the source is subject to the requirements of MACT Subpart DDDDD. The following is a partial list of the major requirements of MACT Subpart DDDDD: carbon monoxide (CO) emission limit and testing, carbon monoxide CEM required, recordkeeping, reporting, etc. The criteria pollutants (except CO, because it is used in the MACT) should be evaluated in accordance with the above guidance for Stationary Natural Gas Combustion Sources “Not Located at a Facility Major for HAPs”