



## Emissions Summary

The following changes in potential emissions will result from this modification:

<i>Pollutant</i>	<i>Change in Potential Emissions (+ or -), TPY</i>	<i>New Facility Wide Potential, TPY</i>
CO	+20.29	36.68
NO <sub>x</sub>	-39.02	94.42
PM	-0.58	1.46
SO <sub>2</sub>	+0.01	0.04
VOC	+1.36	10.05
CO <sub>2e</sub>	-963.9	6,443.77
HAPs	+0.6	3.67

## Title V Program Applicability Basis

In accordance with the proposed changes associated with this modification, the Heizer facility plans on reducing its potential to emit below 100 tons per year of any criteria pollutant. Additionally, the facility will remain below 10 tons per year of any individual HAP or below 25 tons per year of aggregate HAPs. Cranberry Pipeline Corporation has requested to maintain their Title V permit until such time as compliance is demonstrated via stack testing in accordance with the minor source NSR permit requirements of R13-2694C.

**Legal and Factual Basis for Permit Conditions**

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

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

Federal and State:	45CSR2 45CSR6 45CSR10 45CSR11 45CSR13 WV Code § 22-5-4 (a) (14)  45CSR30 40 C.F.R. Part 61 40 C.F.R. 63, Subpart ZZZZ 40 C.F.R. 64 40 C.F.R. Part 82, Subpart F	Particulate matter air pollution Open burning prohibited. Emissions of sulfur oxides Standby plans for emergency episodes. NSR permits. The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. Asbestos inspection and removal Area Source RICE Compliance Assurance Monitoring Ozone depleting substances
State Only:	45CSR4 45CSR17 45CSR27	No objectionable odors. Particulate Fugitive. Toxic Air Pollutants

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

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

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2694C	Pending	

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

**Determinations and Justifications**

The following changes were made to the Title V permit for this modification:

The specific changes to the permit can be observed within the strikeout/underline format of the draft/proposed significant modification permit. However, the majority of these changes are summarized

within the process description above. In addition to this summary it should be noted that a new section 5.0 was added to incorporate the area source 40 C.F.R. 63, subpart ZZZZ, RICE requirements for the new engine. Additionally, the old sections 4 and 5 were combined within a new section 4.0.

While evaluating this requirement it was noted that the Heizer facility may qualify for the remote stationary RICE classification in accordance with the criteria established within condition #2 of the definition. As a result, both the remote and non-remote engine requirements were added within section 5.0. The remote engine standards include work practice standards and the non-remote engine standards require the use of a catalyst in order to maintain a 93% CO reduction for 4 stroke lean burn engines. Under the new amendments to subpart ZZZZ, sources are required to update their remote classification criteria every 12 months.

**Greenhouse Gas Tailoring Rule:** There have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

**Non-Applicability Determinations**

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

45CSR14	Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration. This facility’s potential emissions are below 250 tons per year. Therefore, this rule does not apply.
45CSR19	Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution Which Cause or Contribute to Nonattainment. This facility is in an attainment area.
45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants. Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”  Additionally, pursuant to §45-27-3.1, the “owner or operator of a plant that discharges or may discharge a toxic air pollutant into the open air in excess of the amount shown in the Table A [of 45CSR27] shall employ [Best Available Technology] at all chemical processing units emitting the toxic air pollutant.” The facility-wide PTE of formaldehyde is 2.92 TPY - greater than the 1,000 pound per year threshold given in Table A of 45CSR27. However, internal combustion engines do not meet the definition of “chemical processing units” under §45-27-2.4 and, therefore, they are not subject to BAT under 45CSR27.
40 C.F.R. 60 Subpart GG	Standards of Performance for Stationary Gas Turbines. There are no turbines at the Heizer Compressor Station.
40 C.F.R. 60 Subpart Dc	The reboiler at this facility is below 10 million BTU/hr, thus this subpart does not apply per 40 C.F.R. § 60.40c.
40 C.F.R. 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. All tanks storing volatile organic liquids are below 75 m <sup>3</sup> in capacity.
40 C.F.R. 60 Subpart KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. Heizer station is not engaged in the extraction of natural gas from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
40 C.F.R. 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO <sub>2</sub> Emissions. There are no sweetening units at the Heizer station.
40 C.F.R. 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. Per §40.4230(a)(4), Subpart JJJJ does not apply to engines that “commenced construction” before June 12, 2006 unless that engine is reconstructed or modified per §40.4230(a)(5). Cranberry has stated that both the existing Cooper engine and the “new” White Superior engine were constructed before June of 2006. Also, per §60.14(e)(6), the relocation of an existing unit does not meet the definition of “modification”. Additionally, under §60.4236 (What is the deadline for importing or installing

	stationary SI ICE produced in the previous model year?) §60.4236 (e) states, “The requirements of this section do not apply to owners and operators of stationary SI ICE that have been modified or reconstructed, and they do not apply to engines that were removed from one existing location and reinstalled at a new location.”
40 C.F.R. 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines. There are no turbines at the Heizer Compressor Station.
40 C.F.R. 60 Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution. Subpart OOOO applies only to compressors “between the wellhead and the point of custody transfer to the natural gas transmission and storage segment”. Heizer is a natural gas transmission facility because all gas received and stored is transferred from transmission pipelines (Tennessee pipeline). Therefore, subpart OOOO compressor requirements do not apply. Additionally, all storage tanks at the facility were constructed prior to the NSPS’s applicability date for tanks of August 23, 2011.
40 CFR 63 Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. This facility is a transmission facility, therefore this subpart does not apply.
40 CFR 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. This facility is a synthetic minor source of HAPs, therefore there are no applicable requirements from this subpart.
40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. This facility is not a major source of HAPs, therefore this subpart does not apply to this facility according to 40 C.F.R. § 63.7485.
40 CFR 63 Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. This facility does operate a process heater for the dehydration unit reboiler, but since this area source rule only includes boilers, Heizer is exempt from subpart JJJJJ.
40 C.F.R. Part 64	CAM has been addressed in previous permitting actions, and no additional CAM requirements are necessary.

**Request for Variances or Alternatives**

None.

**Insignificant Activities**

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

**Comment Period**

Beginning Date: May 7, 2013  
 Ending Date: June 6, 2013

**Point of Contact**

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

Jesse Hanshaw, P.E.  
 Title V Permit Writer  
 West Virginia Department of Environmental Protection  
 Division of Air Quality  
 601 57<sup>th</sup> Street SE  
 Charleston, WV 25304

**Procedure for Requesting Public Hearing**

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

**Response to Comments (Statement of Basis)**

Pending