

Fact Sheet



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

Permit Number: **R30-05100141-2015**
Application Received: **November 10, 2014**
Plant Identification Number: **03-054-05100141**
Permittee: **Williams Ohio Valley Midstream LLC**
Facility Name: **Moundsville Fractionation Plant**
Mailing Address: **100 Teletech Drive, Suite 2, Moundsville, WV 26041**

Revised: N/A

Physical Location: Moundsville, Marshall County, West Virginia
UTM Coordinates: 517.35 km Easting • 4,418.11 km Northing • Zone 17
Directions: From Moundsville, take State WV-2/Lafayette Avenue South, then West, approximately 2 miles. Site is on the right, at the site of the former Olin Facility in Round Bottom.

Facility Description

The permittee currently operates a 42,500 barrel per day (bpd) natural gas liquids (NGLs) fractionation facility and loading terminal located along State Route 2 in Marshall County approximately two (2) miles south of Moundsville. The process and equipment associated with this operation are referred to as Fractionation Train 1 (Frac 1) and Fractionation Train 2 (Frac 2) with combined capacity of 58,200 bpd. The facility is characterized by NAICS and SIC codes 21112 and 1321, respectively.

The Moundsville Fractionation Plant receives NGL and processes it through a series of distillation processes (de-propanizer and de-butanizer towers) to generate three (3) products: propane, mixed butanes and heavier weight organics identified as natural gasoline. The fractionation plant consists of a series of distillation processes where propane and then mixed butanes are removed from the NGL. The remaining liquid is classified as "natural gasoline". The incoming NGL is accumulated in a series of pressure vessels. The primary purpose of these tanks is to act as a buffer for variations in the rate of NGL receipt to ensure a steady flow rate through the process, and providing plant storage. Frac 2 is also capable of loading either NGL as received or all of the products into rail cars and trucks for shipment to markets through the existing

and new rail and truck loading equipment. The three (3) products will be accumulated in a series of pressure vessels.

There are two (2) 89.85 MMBtu/hr and one (1) 45.54 MMBtu/hr natural gas fired heaters that will heat fluid that is used at various locations throughout the facility to control the temperature within certain process equipment.

A new flare was installed as part of the installation of Frac 2, and the existing flare associated with Frac 1 was removed from service. The new flare receives Frac 1 loads as well. This new flare is a Zeeco air assisted flare used for both routine venting control and to combust NGL or products in the event of an emergency that requires rapid removal of NGL and/or product from the entire station.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]	
Regulated Pollutants	Potential Emissions ¹
Carbon Monoxide (CO)	146.38
Nitrogen Oxides (NO _x)	79.17
Particulate Matter (PM _{2.5})	14.98
Particulate Matter (PM ₁₀)	14.98
Total Particulate Matter (TSP)	14.98
Sulfur Dioxide (SO ₂)	0.46
Volatile Organic Compounds (VOC)	216.59
<i>PM₁₀ is a component of TSP.</i>	
Hazardous Air Pollutants	Potential Emissions
Benzene	0.21
Ethylbenzene	0.16
Formaldehyde (HCHO)	0.07
n-Hexane	9.40
Toluene	0.39
2,2,4 - Trimethylpentane	0.32
Xylenes	1.08
Other HAP	0.02
Total HAP	11.65

¹ The facility's potential emissions account for changes from the revision of R13-2892C to draft permit R13-2892D, and emergency generator general permit G60-C069.

Title V Program Applicability Basis

This facility has the potential to emit 146.38 tpy of CO and 216.59 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Williams Ohio Valley Midstream's Moundsville Fractionation Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

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

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

Federal and State:	45CSR2	Control of PM from Indirect Heat Exchangers
	45CSR2A	Testing, Monitoring, Recordkeeping and Reporting Requirements under 45CSR2
	45CSR6	Open burning prohibited.
	45CSR10	Control of Air Pollution from Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction/modification
	45CSR16	Standards of performance pursuant to 40 C.F.R. Part 60
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission standards for HAPs
	40 C.F.R. 60 Subpart Dc	NSPS for small steam generating units
	40 C.F.R. 60 Subpart Kb	NSPS for Volatile Organic Liquid Storage Vessels after July 23, 1984
	40 C.F.R. 60 Subpart JJJJ	NSPS for Spark Ignition IC Engines
	40 C.F.R. 60 Subpart OOOO	NSPS for Crude Oil and Natural Gas Production, Transmission, and Distribution
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart ZZZZ	NESHAPs-MACT for RICE
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

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 (if any)
R13-2892D	Draft	
G60-C069	March 31, 2015	

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

Determinations and Justifications

- I. **45CSR2 – To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.** This rule establishes emission limitations for smoke and particulate matter which are discharged from fuel burning units. The facility has two Hot Oil Heaters (Em. Unit IDs: 1-HTR and 2-HTR; Em. Pt. IDs: 1E and 2E) that are both “Fuel Burning Unit[s]” as defined in 45CSR§2-2.10. Further, both sources are in the Type ‘b’ category since they combust natural gas (45CSR§2-2.10.b.). The heater designated as emission unit 2-HTR (emission point ID: 2E) is composed of two (2) 89.85 MMBTU/hr gas-fired heaters for a total heat input of 179.7 MMBTU/hr.

STANDARDS AND LIMITATIONS

Both units are subject to the ten (10) percent **opacity** standard in 45CSR§2-3.1. and the corresponding Method 9 or COMS compliance demonstration method prescribed in 45CSR§2-3.2. Both of these requirements are included in conditions 5.1.9. and 5.3.1. of R13-2892D (discussed below), which are Title V permit conditions 4.1.9. and 4.3.1.

Both units are subject to the particulate matter **mass rate emission limit** in 45CSR§2-4.1.b. Using the prescribed multiplier (0.09) and the total design heat inputs computed from both sources, the PM mass rate limit is given by the following equation:

$$\begin{aligned} &\text{Total Allowable Emission Rate for 1-HTR (1E) and 2-HTR (2E)} = \dots \\ &\dots (0.09) \times [45.54 \text{ MMBTU/hr} + (89.85 \text{ MMBTU/hr/unit}) \times (2 \text{ units})] = 20.3 \text{ lb/hr} \end{aligned}$$

According to the Title V application, the potential PM emissions from 1E and 2E are 0.34 lb/hr and 0.67 lb/hr, respectively. However, the Engineering Evaluation for R13-2892C mentions respective potentials of 0.35 lb/hr and 1.38 lb/hr. It appears that the potential for 2-HTR in the engineering evaluation accounts for both 89.85 MMBTU/hr units, while the Title V application is per unit. Regardless, the potential emissions are substantially less than the total allowable emission rate computed above. Therefore, the permittee should meet the PM mass rate limits for these units. Neither R13-2892C nor R13-2892D set a PM limit based upon potentials, and R13-2892C did not include the 45CSR2 limits computed in its engineering evaluation. Since a Title V permit must include all applicable requirements, permit condition 4.1.11. has been written to include the total PM mass rate limit computed above.

MONITORING

Since the units combust only natural gas, they qualify for the exception in 45CSR§2-8.4.b. This provides that qualifying sources are not subject to 45CSR§2-8.1.a. (*i.e.*, periodic testing of opacity and PM mass rate) and 45CSR§2-8.2. (*i.e.*, monitoring plans and COMS). However, permit R13-2892D, condition 5.2.1. (Title V condition 4.2.1.), has prescribed Method 9 monitoring to demonstrate compliance with the opacity limitation at the discretion of the Director.

TESTING

While 45CSR§2-8.1.a. is not applicable due to the exception discussed above, 45CSR§§2-8.1.b. and 8.1.c. are applicable and are set forth as Title V condition 4.3.2.

RECORDKEEPING AND REPORTING

Neither 45CSR§§2-8.3.a. nor 8.3.b. are applicable since both pertain to monitoring plans, which are not applicable. However, 45CSR§2-8.3.c. is applicable and is embodied in condition 5.4.1. of R13-2892D (Title V condition 4.4.1.). Therefore, this section of the rule is cited in Title V condition 4.4.1. In addition, for fuel burning units that combust only pipeline quality natural gas, 45CSR§2A-7.1.a.1. requires recordkeeping of date and time of start-up and shutdown, and the quantity of fuel consumed on a monthly basis. The statement “The permittee shall maintain records of the date and time of fuel burning unit start-up and shutdown” has been added to condition 4.4.1. However, the monthly basis is already specified by the NSR permit requirement.

- II. **45CSR4 – *To Prevent and Control the Discharge of Air Pollutants into the Open Air which Causes or Contributes to an Objectionable Odor or Odors.*** The applicable requirements of this rule are included in the Title V boilerplate as condition 3.1.4.

- III. **45CSR6 – *Control of Air Pollution from Combustion of Refuse.*** This rule establishes emission standards for particulate matter and requirements for activities involving incineration of refuse which are not subject to, or are exempted from regulation under a federal counterpart for specific combustion sources. This rule also prohibits (with limited exception) open burning. The open burning provisions of 45CSR§6-3 are included in the Title V boilerplate as conditions 3.1.1. and 3.1.2. This rule also applies to the permittee’s flare FL-02 (Em. Unit ID: 5S; Em. Pt. ID: 5E), which is considered an incinerator for this rule and is subject to the emission standards in 45CSR§6-4.1.

STANDARDS AND LIMITATIONS

The mass rate limitation in 45CSR§6-4.1. is based upon incinerator capacity, which is the manufacturer’s or designer’s guaranteed maximum charging rate or such other rate as determined by the Director (45CSR§§6-2.9 and 4.1.). In the application Supplement 06 Vendor Data, technical specifications regarding the Process Flare FL-02 (5S) have been provided. Among the data, two flare capacities were highlighted by the permittee. One flare design capacity is based upon combustion of primarily propane, and is 350,227 lb/hr. The other capacity is a smokeless capacity of 28,000 lb/hr based on Ringelmann 1 opacity¹. Since the flare is limited to no visible emissions (R13-2892D, 6.1.5.b.) that streamlines the next less stringent applicable 20% opacity limit (45CSR§6-4.3.), the smokeless capacity will be used as the incinerator capacity in the PM limit computation. Hence, the 45CSR6 PM limit for the flare (Em. Pt. ID: 5E) is:

$$\begin{aligned}\text{Emissions (lb/hr)} &= F \times \text{Incinerator Capacity (tons/hr)} \\ \text{Emissions (lb/hr)} &= (2.72) \times (28,000 \text{ lb/hr}) / (2,000 \text{ lb/ton}) \\ \text{Emissions (lb/hr)} &= 38.1 \text{ lb/hr}\end{aligned}$$

¹ Ringelmann 1 is equivalent to 20 percent opacity. Refer to Table 1 on page 4 of the U.S. EPA’s “Visible Emissions Field Manual EPA Methods 9 and 22” EPA 340/1-92-004 dated December 1993, accessed by the writer at <http://www.epa.gov/ttn/emc/methods/VEFieldManual.pdf> on February 12, 2015.

The NSR permit R13-2892D did not set a PM limit based upon potential-to-emit, nor did it include the 45CSR6 PM mass rate limit from 45CSR§6-4.1. Since a Title V permit must include all applicable requirements, permit condition 5.1.7. has been written to include the PM mass rate limit computed above.

When properly operated, PM emissions from the flare are expected to be negligible and in compliance with the calculated limit. However, the application Attachment N for R13-2892D states the potential PM rate from the flare is 1.48 lb/hr, which is significantly less than the limit.

Even though the source is in Marshall Country, the operating restrictions in 45CSR§6-4.2. are not applicable to the flare as provided in the last statement of that subsection.

MONITORING, TESTING, AND OPERATIONS REQUIREMENTS

The visible PM requirements of 45CSR§6-4.3., 4.4., and 4.5. are applicable. However, permit R13-2892D, condition 6.1.5.b., prescribes no visible emissions except for certain 5-minute periods. Since this requirement is more stringent than the applicable 45CSR6 visible emission standards, a streamlining note has been added after condition 5.1.5.b. and the 45CSR6 subsections have been included in the citation of authority for condition 5.1.5.

The operations and maintenance requirement to prevent objectionable odors in 45CSR§6-4.6. is applicable; therefore, it is included as Title V condition 5.1.8.

The testing requirements in 45CSR§§6-7.1. and 7.2. are applicable; therefore, they are included as draft Title V condition 5.3.4. (final permit condition 5.3.3. due to deletion of requirement 6.3.3. in final permit R13-2892D).

- IV. **45CSR10 – To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.** The purpose of this rule is to prevent and control air pollution from the emission of sulfur oxides. The facility has two Hot Oil Heaters (Em. Unit IDs: 1-HTR and 2-HTR; Em. Pt. IDs: 1E and 2E) that are both “Fuel Burning Unit[s]” as defined in 45CSR§10-2.8. Further, both sources are in the Type ‘b’ category since they combust natural gas (45CSR§10-2.8.b.). The heater designated as emission unit 2-HTR (emission point ID: 2E) is composed of two (2) 89.85 MMBTU/hr gas-fired heaters for a total heat input of 179.7 MMBTU/hr. Since the facility is located in Marshall County, the facility is designated as being in Priority Classification I.

STANDARDS AND LIMITATIONS

Both units are subject to the SO₂ mass rate emission limit in 45CSR§10-3.1.e. Using the prescribed multiplier (3.1) and the total design heat inputs of each source, the SO₂ mass rate limit is:

Total Allowable Emission Rate for 1-HTR (1E) and 2-HTR (2E) = ...

$$\dots (3.1) \times [45.54 \text{ MMBTU/hr} + (89.85 \text{ MMBTU/hr/unit}) \times (2 \text{ units})] = 698 \text{ lb/hr}$$

According to the Title V application, the combined potential SO₂ emissions from 1E and 2E is 0.13 lb/hr. The potential emissions are substantially less than the allowable emissions computed above. Therefore, the permittee should meet the SO₂ mass rate limits for these units. The NSR permit R13-2892C did not set an SO₂ limit based upon potentials, nor did it include the 45CSR10 limit computed in its engineering evaluation. Also the current revision R13-2892D does not include the limit. Since a Title V permit must include all applicable requirements, permit condition 4.1.12. has been written to include the above SO₂ mass rate limit.

Neither of the heaters' operation results in the separation of the air pollutant (i.e., SO₂) from the process materials or in the conversion of the process materials into air pollutants. Therefore, the heaters are not considered a "source operation" as defined in 45CSR§10-2.19. Consequently, the in-stack SO₂ concentration limitation in 45CSR§10-4.1. does not apply.

Neither of the heaters combust a refinery process gas stream or any other process gas stream; therefore, the hydrogen sulfide concentration limit in 45CSR§10-5.1. does not apply.

MONITORING AND RECORDKEEPING

45CSR§10-10.3. provides an exemption from section 8 requirements for natural gas-burning units. Therefore, none of the testing, monitoring, recordkeeping, and reporting in 45CSR§10-8 is included in the Title V permit. Considering the anticipated high margin of compliance, the recordkeeping already required by R13-2892D, condition 5.4.1. (Title V condition 4.4.1.) for other pollutants would be adequate to demonstrate compliance with the SO₂ limits in condition 4.1.12. should such demonstration ever be deemed necessary by the Director.

- V. **45CSR13, Permit No. R13-2892D.** The requirements of this draft NSR permit are incorporated into the Title V permit as set forth in the following table. As mentioned above, this is a draft NSR permit that is currently at notice. Once the NSR permit is issued required changes, if any, will be incorporated into the Title V permit and will be documented in the Fact Sheet.

R13-2892D	Title V	Discussion
Facility-wide		
4.1.1.	3.4.1.	The requirement is the same as the Title V permit boilerplate condition; therefore, the NSR permit condition is included in the citation of authority.
4.1.2.	3.1.9.	The requirement is written in the Title V permit.
4.1.3.	3.1.10.	The requirement is written in the Title V permit.
4.1.4.	3.4.4.	The requirement is written in the Title V permit.
Hot Oil Heater (1E), Hot Oil Heaters (2E)		
5.1.1.	4.1.1.	The requirement is written in the Title V permit.
5.1.2.	4.1.2.	The requirement is written in the Title V permit.
5.1.3.	4.1.3.	The requirement is written in the Title V permit.
5.1.4.	4.1.4.	The requirement is written in the Title V permit.
5.1.5.	4.1.5.	The requirement is written in the Title V permit.
5.1.6.	4.1.6.	The requirement is written in the Title V permit.
5.1.7.	4.1.7.	The requirement is written in the Title V permit.
5.1.8.	4.1.8.	The requirement is written in the Title V permit.
5.1.9.	4.1.9.	The requirement is written in the Title V permit. The citation of authority also includes 45CSR§2-3.1. for the reasons given above in the 45CSR2 discussion.
5.1.10.	4.1.10.	The requirement is written in the Title V permit. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart Dc.
5.2.1.	4.2.1.	The requirement is written in the Title V permit.
5.3.1.	4.3.1.	The requirement is written in the Title V permit. The citation of authority also includes 45CSR§2-3.2. for the reasons given above in the 45CSR2 discussion.
5.4.1.	4.4.1.	The requirement is written in the Title V permit. The citation of authority also includes 45CSR§2-8.3.c. for the reasons given above in the 45CSR2 discussion.

R13-2892D	Title V	Discussion
5.4.2.	4.4.2.	The requirement is written in the Title V permit. The language “this section” is changed to “§60.48c”. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart Dc.
5.4.3.	4.4.3.	The requirement is written in the Title V permit. The language “this section” is changed to “§60.48c”. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart Dc.
5.4.4.	4.4.4.	The requirement is written in the Title V permit. The language “this section” is changed to “§60.48c”. The language “this subpart” is changed to “40 C.F.R. 60 Subpart Dc”. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart Dc.
5.5.1.	4.5.1.	The requirement is written in the Title V permit. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart Dc.
5.5.2.	4.5.2.	The requirement is written in the Title V permit. The language “this subpart” is changed to “40 C.F.R. 60 Subpart Dc”. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart Dc.
Flare Control Device 5S		
6.1.1.	5.1.1.	The requirement is written in the Title V permit.
6.1.2.	5.1.2.	The requirement is written in the Title V permit.
6.1.3.	5.1.3.	The requirement is written in the Title V permit. However, during pre-draft review the permittee noted that the ethylbenzene limitations are incorrect. This writer reviewed the application for R13-2892D and the ethylbenzene limitations have been revised to reflect the information filed in the application for R13-2892D (Attachment J – Table 1: Emission Points Data – Page 04 of 07). In particular, the maximum potential controlled emissions of ethylbenzene in the application are 0.09 lb/hr and 0.05 tpy. It appears that the draft NSR permit limits of 0.05 lb/hr and 0.02 tpy were mistakenly transcribed from the formaldehyde (HCHO) emissions in the table row adjacent to ethylbenzene.
6.1.4.	5.1.4.	The requirement is written in the Title V permit.
6.1.5.	5.1.5.	The requirement is written in the Title V permit.
6.1.6.	5.1.6.	The requirement is written in the Title V permit.
6.2.1.	5.2.1.	The requirement is written in the Title V permit.
6.2.2.	5.2.2.	The requirement is written in the Title V permit.
6.2.3.	5.2.3.	The requirement is written in the Title V permit.
6.3.1.	5.3.1.	The requirement is written in the Title V permit.
6.3.2.	5.3.2.	The requirement is written in the Title V permit.
6.3.3.	5.3.3.	The requirement is written in the Title V permit.
6.4.1.	5.4.1.	The requirement is written in the Title V permit.
6.4.2.	5.4.2.	The requirement is written in the Title V permit.
6.4.3.	5.4.3.	The requirement is written in the Title V permit.
6.4.4.	5.4.4.	The requirement is written in the Title V permit.
6.4.5.	5.4.5.	The requirement is written in the Title V permit.
6.4.6.	5.4.6.	The requirement is written in the Title V permit.
6.5.1.	5.5.1.	The requirement is written in the Title V permit.

R13-2892D	Title V	Discussion
6.5.2.	5.5.2.	The requirement is written in the Title V permit.
6.5.3.	5.5.3.	The requirement is written in the Title V permit.
40 C.F.R. 60 Subpart OOOO Requirements, Gas Processing Plants		
7.1.1.	6.1.1.	The requirement is written in the Title V permit.
7.1.2.	6.1.2.	The requirement is written in the Title V permit. The word “are” is changed to “all” in the last sentence of the condition.
7.1.3.	6.1.3.	The requirement is written in the Title V permit.
7.1.4.	6.1.4.	The requirement is written in the Title V permit. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart OOOO.
7.1.5.	6.1.5.	The requirement is written in the Title V permit. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart OOOO.
7.1.6.	6.1.6.	The requirement is written in the Title V permit. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart OOOO.
7.2.1.	6.2.1.	The requirement is written in the Title V permit. The NSPS citation is changed to also include §60.5410(f). 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart OOOO.
7.3.1.	6.3.1.	The requirement is written in the Title V permit. The NSPS citation §60.5415(f) has been added. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart OOOO.
7.3.2.	None	The NSR permit requirement is excluded from the Title V permit. The requirement sets forth criteria from a prior version of Subpart OOOO that provided for an affirmative defense for violations of emission standards during malfunction. However, the regulation was amended after R13-2892C was issued. The affirmative defense language was retained in R13-2892D. At the time of writing this Title V permit there is no affirmative defense language in Subpart OOOO. Moreover, §60.5415(h) no longer exists in the regulation. For these reasons, the underlying requirement 7.3.2. is not incorporated into the Title V permit.
7.4.1.	6.5.1.	The requirement is written in the Title V permit. The NSPS citation §60.5420(a)(2) is added to the citation of authority. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart OOOO.
7.4.2.	6.5.2.	The requirement is written in the Title V permit. The NSPS citation §60.5420(b)(1) is added to the citation of authority. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart OOOO.
7.4.3.	6.4.1.	The requirement is written in the Title V permit. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart OOOO.
7.4.5.*	6.5.3.	The requirement is written in the Title V permit. 45CSR16 is added to the citation of authority since the condition requires compliance with 40 C.F.R. 60 Subpart OOOO.
7.5.1.	6.4.2.	The requirement is written in the Title V permit.

R13-2892D	Title V	Discussion
40 C.F.R. 60 Subpart Kb, Natural Gasoline Storage Tanks (V-2950, V-2951)		
8.1.1. 8.1.2. 8.1.3.	8.1.1.	These paragraphs specifying the applicability and designation of the affected facility have been combined into one operating permit condition.
8.2.1.	8.1.2.	NSPS Subpart Kb requirements have been incorporated into the Title V permit as discussed below in its own section in this Fact Sheet. All applicable language from §§60.112b(b) and (a)(3) have been included in the permit condition. The underlying permit requirement has been included in the citation of authority.
8.3.1	None	The underlying federal requirement in §60.113b(c) reads, “The owner or operator of each source that is equipped with a closed vent system and control device as required in §60.112b (a)(3) or (b)(2) (other than a flare) is exempt from §60.8 of the General Provisions and shall meet the following requirements.” This means that for a source that use a control device other than a flare, the source is exempt from §60.8 and has to meet the requirements in this paragraph. In the permittee’s case, the control device utilized is a flare (FL-02). Therefore, this paragraph does not apply and its corresponding NSR permit requirement 8.3.1. has not been included in the operating permit.
8.4.1.	8.4.1.	The applicable portion of the requirement has been included in the operating permit. Refer to the NSPS Subpart Kb discussion of §60.115b for further details.
8.4.2.	None	This NSR permit requirement is based on underlying requirements in §60.115b(c). However, §60.115b(c) is not applicable because it applies to a closed vent system and control device <i>other than a flare</i> . Since the tanks are controlled by flare FL-02, this requirement is not applicable. Consequently, the NSR permit requirement is not applicable and is not included in the operating permit.
8.4.3.	None	This NSR permit requirement is based on underlying requirements in §60.113b(c). However, §60.113b(c) is not applicable because it applies to a closed vent system and control device <i>other than a flare</i> . Since the tanks are controlled by flare FL-02, this requirement is not applicable. Consequently, the NSR permit requirement is not applicable and is not included in the operating permit.
8.5.1.	8.4.3.	This paragraph applies to all applicable recordkeeping in §60.116b. As demonstrated below in the NSPS Subpart Kb discussion, only paragraphs (a) and (b) of §60.116b are applicable. Since (a) requires the record in (b) to be kept for the life of the source, the language specifying a 2-year minimum retention time is not applicable, and is therefore not included in the permit condition.
8.5.2.	8.4.3.	This paragraph is applicable and has been included in the operating permit.
8.5.3.	None	This NSR permit requirement is based on underlying requirements in §60.116b(c). However, the tanks V-2950 and V-2951 are exempt from §60.116b(c) because they meet the exemption criteria provided in §60.116b(g). That is, each vessel is equipped with a closed vent system and control device meeting the specification of §60.112b (permit condition 8.1.2.). Consequently, the NSR permit condition is not applicable.

R13-2892D	Title V	Discussion
8.5.4.	None	This NSR permit requirement is based on underlying requirements in §60.116b(e). However, §60.116b(e) is not applicable since it pertains to the storage temperature to determine the maximum true vapor pressure utilized in non-applicable paragraph §60.116b(d) (note that §60.116b(d) is not applicable due to the sources meeting the exemption criteria in §60.116b(g)). As such, §60.116b(e), and the NSR permit condition founded upon it, are not applicable.
8.5.5.	None	This NSR permit requirement is based on underlying requirements in §60.116b(f) for a vessel storing a waste mixture of indeterminate or variable composition. The tanks V-2950 and V-2951 are not utilized to store a waste mixture of indeterminate or variable composition; therefore, the requirements of this paragraph, and the NSR permit condition founded upon it, are not applicable.
8.5.6.	None	This permit condition is based on the underlying exemption in §60.116b(g). The tanks V-2950 and V-2951 meet the exemption criteria provided in §60.116b(g) since each vessel is equipped with a closed vent system and control device meeting the specification of §60.112b (permit condition 8.1.2.). As such, they are exempt from the requirements of paragraphs (c) and (d) of §60.116b. Further, §60.116b(g) places no other requirement on the permittee. Since this paragraph provides only an exemption to certain requirements it has not been included in the operating permit.

* Note that there is no condition 7.4.4. in permit R13-2892D.

VI. **45CSR13, Class II General Permit No. G60-C069.** The application for this permit was received on December 22, 2014, for authorization to construct and operate an emergency generator at the facility.

PROJECT DESCRIPTION

The proposed project involves the installation of an emergency backup generator at the Moundsville Fractionation Plant for the purpose of supplying power to allow key systems to continue to operate without interruption during times of utility power outages. According to the engine data sheet and emissions calculations supplied in the application for G60-C069, the engine is characterized as follows:

- Site Rating: 49.2 bhp (36.7 kW)
- Ignition: Spark (*i.e.*, SI)
- Cycle & Combustion: Four-stroke rich burn (4SRB)
- Fuel type: Propane
- Operation: 500 hr/yr (max.)
- Add-on control device: none
- Date of manufacture: November 2012
- NSPS Subpart JJJJ Certified: Yes

POTENTIAL EMISSIONS

According to the application for G60-C069 the potential emissions for the engine are those in the following table:

Pollutant	Potential Emissions (tpy)
SO ₂	6.8 × 10 ⁻⁵
NO _x	0.16
PM ₁₀	2.2 × 10 ⁻³
CO	6.38
VOC	0.01

These potential emissions are accounted for in the Emissions Summary of this Fact Sheet.

40 C.F.R. 63 SUBPART ZZZZ

This subpart establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

The facility is an area source of HAPs (§63.6585(c)). The emergency generator engine (Em. Unit ID: 6S) is subject to this subpart as a *New stationary RICE* since it was constructed after June 12, 2006 (§63.6590(a)(2)(iii)). The engine does not meet any of the criteria in §§63.6590(b)(1) through (3) for stationary RICE subject to limited requirements.

40 C.F.R. §63.6590(c) sets forth criteria for certain *Stationary RICE subject to Regulations under 40 C.F.R. Part 60*. A RICE that meets any of the criteria in §§60.6590(c)(1) through (7) must meet the requirements of Subpart ZZZZ by meeting the requirements of the applicable NSPS, which in this case, is Subpart JJJJ for spark ignition engines. No further requirements apply for such engines under part 63. Since engine 6S is a new stationary RICE at an area source, it meets the criteria of §60.6590(c)(1) and will comply with 40 C.F.R. 63 Subpart ZZZZ by complying with 40 C.F.R. 60 Subpart JJJJ. Since MACT Subpart ZZZZ is applicable to engine 6S, and compliance with NSPS Subpart JJJJ is the prescribed means of complying with Subpart ZZZZ, each permit condition containing an NSPS Subpart JJJJ requirement will also include in its citation “40 C.F.R. §§63.6590(c) and (c)(1); 45CSR34”.

40 C.F.R. 60 SUBPART JJJJ

The engine is required to comply with this subpart to meet the requirements of 40 C.F.R. 63 Subpart ZZZZ. The applicable requirements of Subpart JJJJ are incorporated via general permit G60-C.

INCORPORATION OF APPLICABLE REQUIREMENTS INTO THE TITLE V PERMIT

The registration provides specific hourly and annual mass rate emission limits for NO_x and CO, which are incorporated into the permit as condition 7.1.1. According to the G60-C069 registration, sections 5 and 8 of the general permit are applicable to the engine, which are incorporated into the permit as condition 7.1.2. In addition to specifying the applicable section of G60-C, the specific applicable requirements in G60-C are also listed in condition 7.1.2. G60-C requirements that provide exemptions that do not require the permittee to perform any activity, or that are not applicable to the engine, are not listed in permit condition 7.1.2. The following tables are an applicability analysis of the G60-C requirements. Requirements that are applicable are noted in bold font.

G60-C Section 5 Applicability Analysis

G60-C Condition	Discussion
5.1.1.	This requirement to operate EG-1 in accordance with the manufacturer's recommendations and specifications and in a manner consistent with good operating practices is applicable; therefore it is listed in condition 7.1.2.
5.1.2.	This requirement for EG-1 to meet the specific emission limitations in the registration is applicable; therefore it is cited in condition 7.1.1. and listed in condition 7.1.2.
5.1.3.	This G60-C condition states, "The maximum fuel consumption for any registered reciprocating internal combustion engine listed in the General Permit Registration application shall not exceed the fuel consumption recorded with registrant's Class II General Permit Registration Application without effecting a modification or administrative update." The application for G60-C069 records a fuel consumption of 0.09 MMscf/yr in both Attachment G (Emergency Generator Data Sheet) and Attachment I (Emission Calculations). The G60-C condition specifies that the fuel consumption recorded in the "application" cannot be exceeded without effecting a modification of administrative update. Therefore, the fuel consumption of 0.09 MMscf/yr has been provided in the maximum fuel consumption limitation in permit condition 7.1.3.
5.1.4.	No control device (i.e., catalytic oxidizer) is utilized for EG-1; therefore, this G60-C condition is not applicable.
5.2.1.	No control device (i.e., catalytic oxidizer) is utilized for EG-1; therefore, this G60-C condition is not applicable.
5.3.1.	This G60-C condition refers to Section 3.4 of G60-C which is applicable; therefore, 5.3.1. is applicable.
5.4.1.	This G60-C requirement is utilized to demonstrate compliance with emission limits and operating limits. Conditions 7.4.1. and 7.4.2. are written to (i) specify the records necessary to demonstrate compliance with the requirements of condition 7.1.1.; and (ii) to specify that annual emission limits and annual operating hours are demonstrated on a 12-month rolling total, which is why 45CSR§30-5.1.c. is cited.
5.5.1.	This G60-C condition refers to Section 3.6 of G60-C which is applicable; therefore, 5.5.1. is applicable.

G60-C Section 8 Applicability Analysis

G60-C Condition	Discussion
8.1.1.	EG-1 is characterized by the criteria in 8.1.1.a.4.; therefore, this G60-C condition is applicable.
8.1.2.	EG-1 is not a stationary SI ICE being tested at an engine test cell/stand; therefore, this G60-C condition is not applicable.
8.1.3.	The source is an area source of HAP. However, it is required to obtain a Title V permit since it is a major source of VOC; therefore, this G60-C condition is not applicable.
8.1.4.	EG-1 is not combusting alcohol-based fuel; therefore, this G60-C condition is not applicable.
8.1.5.	EG-1 is not eligible for exemption from the requirements of this subpart as described in 40 CFR part 1068, subpart C (or the exemptions described in 40 CFR parts 90 and 1048, for engines that would need to be certified to standards in those parts); therefore, this G60-C condition is not applicable.
8.1.6.	EG-1 is not acting as temporary replacement unit and will be located at a stationary source for greater than 1 year; therefore, this G60-C condition is not applicable.

G60-C Condition	Discussion
8.2.1.	EG-1 has a maximum engine power greater than 19 kW (25 hp); therefore, this G60-C condition is not applicable.
8.2.2.	EG-1 does not combust gasoline; therefore, this G60-C condition is not applicable.
8.2.3.	EG-1 has a maximum engine power greater than 19 kW (25 hp); was manufactured after the applicable date in §60.4230(a)(4) (i.e., January 1, 2009 for emergency engines greater than 25 hp); and is a rich burn engine that uses LPG. Therefore, the engine must comply with the emission standards in §60.4231(c) in accordance with §60.4233(c) cited for this applicable G60-C condition. In §60.4231(c), the applicable requirement is the second statement in the paragraph: “Stationary SI internal combustion engine manufacturers must certify their emergency stationary SI ICE greater than 25 HP and less than 130 HP that are rich burn engines that use LPG and that are manufactured on or after the applicable date in §60.4230(a)(4) to the Phase 1 emission standards in 40 CFR 90.103, applicable to class II engines, and other requirements for new nonroad SI engines in 40 CFR part 90.”
8.2.4.	EG-1 is a rich burn engine that uses LPG. Since the requirement provides an exception for such engines, this G60-C condition is not applicable to EG-1.
8.2.5.	EG-1 has a maximum engine power less than 100 hp; therefore, this G60-C condition is not applicable.
8.2.6.	EG-1 is not a modified or reconstructed SI ICE; therefore, this G60-C condition is not applicable.
8.2.7.	EG-1 is not a stationary SI wellhead gas ICE; therefore, this G60-C condition is not applicable.
8.2.8.	The applicable certification standard in 40 C.F.R. §90.103 (see condition 8.2.3. above) does not reference 40 C.F.R. §1048.101. As such, EG-1 is not required to meet standards that reference 40 C.F.R. §1048.101; therefore, this G60-C condition is not applicable.
8.2.9.	EG-1 is subject to an emission standard in §60.4233; therefore, this G60-C condition is applicable.
8.3.1.	EG-1 does not combust gasoline; therefore, this G60-C condition is not applicable.
8.3.2.	EG-1 is certified to meet the requirements in §60.4233; therefore, this G60-C condition is not directly applicable to EG-1. However, it still remains applicable to the permittee if an affected engine is installed in the future. Yet, at this time, the condition does not require the permittee to do anything. Therefore this G60-C condition is not listed in Title V permit condition 7.1.2.
8.3.3.	This condition is applicable to the permittee if an affected engine is installed in the future. Yet, at this time, the condition does not require the permittee to do anything. Therefore this G60-C condition is not listed in Title V permit condition 7.1.2.
8.3.4.	EG-1 meets the criteria of this G60-C condition, and the permittee must meet this requirement. Therefore, this G60-C condition is listed in Title V permit condition 7.1.2.
8.3.5.	This condition is applicable to the permittee if an affected engine is installed in the future. Yet, at this time, the condition does not require the permittee to do anything. Therefore this G60-C condition is not listed in Title V permit condition 7.1.2.
8.3.6.	EG-1 has not been modified or reconstructed; therefore, the exemption in this G60-C condition is not applicable.
8.3.7.	EG-1 is rated less than 500 hp; therefore, this G60-C condition is not applicable.
8.3.8.	EG-1 is rated less than 130 hp; therefore, this G60-C condition is not applicable.
8.3.9.	EG-1 meets the criteria of this G60-C condition and must have a non-resettable hour meter upon startup; Therefore, this G60-C condition is listed in Title V permit condition 7.1.2.

G60-C Condition	Discussion
8.4.1.	EG-1 meets the criteria of this G60-C condition; therefore, this G60-C condition is listed in Title V permit condition 7.1.2.
8.4.2.	EG-1 is not required to meet standards in §§60.4233(d) or (e); therefore, this G60-C condition is not applicable.
8.4.3.	EG-1 is not required to meet standards in §60.4233(f); therefore, this G60-C condition is not applicable.
8.4.4.	EG-1 is an emergency engine meeting the criteria of this G60-C condition; therefore, this G60-C condition is listed in Title V permit condition 7.1.2.
8.4.5.	EG-1 is not natural gas-fired; therefore, this G60-C condition is not applicable.
8.4.6.	EG-1 is a certified engine that will be operated and maintained according to the manufacturer's written emission-related instructions; therefore, this G60-C condition is not applicable.
8.4.7.	EG-1 is not equipped with a three-way catalyst, non-selective catalytic reduction device, or a related air-to-fuel ratio controller; therefore, this G60-C condition is not applicable.
8.4.8.	EG-1 is rated less than 500 hp; therefore, this G60-C condition is not applicable.
8.5.1.	Subpart JJJJ performance tests are not required for EG-1; therefore, this G60-C condition is not applicable.
8.6.1.	Portions of this condition are applicable to EG-1. <ul style="list-style-type: none"> • Condition 8.6.1.a. is applicable in its entirety. • The last two statements in condition 8.6.1.b. are applicable to EG-1. • Condition 8.6.1.c. is not applicable since EG-1 is less than 500 hp. • Condition 8.6.1.d. is not applicable since EG-1 is not subject to Subpart JJJJ performance testing.

Since no monitoring requirement in Sections 5 and 8 of G60-C are applicable, permit condition 7.2.1. is reserved.

Since no testing or reporting requirement in Section 8 of G60-C is applicable, those sections are not mentioned in permit conditions 7.3.1. and 7.5.1., respectively.

Since condition 7.1.2. sets forth the requirement to comply with NSPS Subpart JJJJ, and it is the means of complying with MACT Subpart ZZZZ, 40 C.F.R. §§63.6590(c) and (c)(1) are cited in condition 7.1.2. and an italicized streamlining note is added for clarity in the permit condition.

General Permit G60-C is included with the operating permit as Appendix A since it contains the applicable requirements for the underlying general permit registration that are incorporated into Section 7 of the Title V permit.

The engine EG-1 (6S) is not subject to 40 C.F.R. Part 64 since no control device is utilized (§64.2(a)(2)).

VII. 45CSR16 – Standards of Performance for New Stationary Sources. This rule establishes and adopts standards of performance for new stationary sources promulgated by U.S. EPA pursuant to section 111(b) of the federal Clean Air Act, as amended. This rule codifies general procedures and criteria to implement the standards of performance for new stationary sources set forth in 40 C.F.R. Part 60. This rule adopts these federal standards, except as specified in 45CSR§16-4.1. Therefore, this rule is cited with each NSPS requirement (*i.e.*, Subparts Dc, Kb, JJJJ, and OOOO).

VIII. **45CSR34 – Emission Standards for Hazardous Air Pollutants.** This rule establishes and adopts a program of national emission standards for hazardous air pollutants and other regulatory requirements promulgated by the United States Environmental Protection Agency pursuant to 40 CFR Parts 61, 63 and section 112 of the federal Clean Air Act, as amended. This rule codifies general procedures and criteria to implement emission standards for stationary sources that emit (or have the potential to emit) one or more of the eight substances listed as hazardous air pollutants in 40 CFR §61.01(a), or one or more of the substances listed as hazardous air pollutants in section 112(b) of the CAA. This rule adopts these federal standards, except as specified in 45CSR§34-4.1. Therefore, this rule is cited with each NESHAP and NESHAP-MACT requirement (*i.e.*, boilerplate condition 3.1.3. and Subpart ZZZZ) in the operating permit.

IX. **40 C.F.R. 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.** The affected facility to which this subpart applies is each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr). The 45.54 MMBTU/hr hot oil heater 1-HTR (1E) and two (2) – 89.9 MMBTU/hr hot oil heaters 2-HTR (2E) are steam generating units as defined in §60.41c, and as such, are subject to this regulation. The units combust only natural gas.

The permittee is subject to all applicable notifications, recordkeeping, and reporting requirements present in 40 C.F.R. 60 Subpart Dc. The table below sets out the various sections of the regulation and details why requirements either are, or are not, applicable to the facility and describes how the applicable requirements are incorporated into the Title V permit. The sections that are applicable are emphasized with bold font.

Subpart Dc	Title V	Discussion
§§60.42c(a), (b), (c), (d), (e)	None	These sections are not applicable since they pertain to combustion of coal and oil.
§60.42c(f)	None	This section is not applicable since it pertains to percent reduction requirements in §60.42c(b) which are non-applicable.
§60.42c(g)	None	This section is not applicable since it pertains to percent reduction requirements, fuel oil sulfur limits, and emission limits in §60.42c, none of which are applicable.
§60.42c(h)	None	This section is not applicable since it pertains to emission limits and fuel oil sulfur limits in §60.42c, none of which are applicable.
§60.42c(i)	None	This section is not applicable since it pertains to SO ₂ emission limits, fuel oil sulfur limits, and percent reduction requirements in §60.42c, none of which are applicable.
§60.42c(j)	None	This section is not applicable since the source is not located in a noncontinental area and is not subject to a percent reduction standard in this regulation.
§60.43c(a)	None	This section is not applicable since it pertains to combustion of coal.
§60.43c(b)	None	This section is not applicable since it pertains to combustion of wood.
§60.43c(c)	None	This section is not applicable since it pertains to combustion of coal, wood, or oil.
§60.43c(d)	None	This section is not applicable since it pertains to PM and opacity standards in §60.43c, none of which are applicable.
§60.43c(e)	None	This section is not applicable since it pertains to combustion of coal, wood, oil, or combinations of these fuels.
§§60.44c and 60.46c	None	These sections are not applicable since the units are not subject to Subpart Dc SO ₂ emission limits.

Subpart Dc	Title V	Discussion
§§60.45c and 60.47c	None	These sections are not applicable since the units are not subject to Subpart Dc PM emission limits.
§60.48c(a)	4.5.1.	This section is applicable, and requires the permittee to submit a notification of the date of construction and actual startup, as provided by 40 C.F.R. §60.7. This requirement was included in R13-2892D, condition 5.5.1.
§§60.48c(b), (c), (d), and (e)	None	These sections are not applicable since they pertain to Subpart Dc PM and opacity standards, SO ₂ emission limits, fuel oil sulfur limits, and percent reduction requirements, none of which are applicable.
§60.48c(f)	None	This section is not applicable since it pertains to supplier fuel certifications for various oils and coal (but not natural gas), none of which are combusted by the units.
§60.48c(g)(1)	4.4.2.	This section is applicable and requires the permittee to record and maintain records of the amount of fuel combusted during each operating day. This requirement was included in R13-2892D, condition 5.4.2.
§§60.48c(g)(2) and (3)	4.4.3. and 4.4.4.	The alternative monthly records allowed while meeting certain criteria specified in these sections are applicable and have been included in R13-2892D, conditions 5.4.3. and 5.4.4.
§60.48c(h)	None	This section is not applicable since the sources are not currently subject to a federally enforceable requirement limiting the annual capacity factor for any fuel or mixture of fuels.
§60.48c(i)	4.4.5.	This section is applicable and is written in the permit.
§60.48c(j)	4.5.2.	This section is applicable and the requirement was included in R13-2892D, condition 5.5.2.

- X. **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.** This subpart applies to each storage vessel with a capacity greater than or equal to 75 m³ (19,812.9 gallons) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984 (§60.110b(a)).

The application states that **two (2) 454,000-gallon² natural gasoline storage tanks are subject to this regulation.** The two tanks were constructed in 2013, and their emissions are controlled by flare FL-02. According to technical correspondence³ from the permittee, these two tanks (V-2950 and V-2951) do not qualify for the exemption at §60.110b(d)(4). The permittee provided the following detailed explanation regarding this determination:

The referenced exemption at §60.110b(d)(4) is for vessels with a design capacity less than or equal to 1,589.874 m³ used for petroleum or condensate stored, processed, or treated prior to custody transfer. Natural gasoline is neither petroleum nor condensate as defined under §60.111b. Petroleum is defined as “the crude oil removed from the earth and the oils derived from tar sands, shale, and coal.” Condensate is defined as “hydrocarbon liquid separated from natural gas that condenses due to changes in the temperature or pressure, or both, and remains liquid at standard conditions.”

² Permit R13-2892D allowed for an increase in capacity from 420,000 gallons to 454,000 gallons each.

³ E-mail dated August 31, 2015 from R. Danell Zawaski PE, Environmental Specialist, Williams Ohio Valley Midstream LLC.

The natural gasoline product at the facility is the material remaining after propane and butane are removed from the inlet natural gas liquids. While the natural gasoline product is derived from natural gas, the liquid is separated from natural gas over multiple treatment steps and is not an oil product. As such, the exemption at §60.110b(d)(4) does not apply to the two (2) 454,000 gallon capacity Natural Gasoline Storage Tanks (V-2950 and V-2951).

The application states that this subpart is not applicable to any other storage vessels at the facility. Although there are multiple vessels each with a capacity greater than 19,812.9 gallons, all such vessels are pressure vessels designed to operate in excess of 204.9 kPa (29.72 psig) and without emissions to the atmosphere; therefore, these vessels are not subject to 40 C.F.R. 60 Subpart Kb in accordance with the exemption in §60.110b(d)(2).

The table below sets out the various sections of the regulation and details why requirements either are, or are not, applicable to the facility and describes how the applicable requirements are incorporated into the Title V permit for the two (2) 454,000-gallon natural gasoline storage tanks identified as emission units V-2950 and V-2951. The sections that are applicable are emphasized with bold font.

Subpart Kb	Title V	Discussion
Standard for volatile organic compounds (VOC)		
§60.110b(a) §60.110b(b) §60.110b(d)(2)	8.1.1.	These applicability and designation of affected facility paragraphs are included to reflect the underlying NSR permit.
§60.112b(a)	None	This paragraph applies to “each storage vessel either with a design capacity greater than or equal to 151 m ³ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa but less than 76.6 kPa or with a design capacity greater than or equal to 75 m ³ but less than 151 m ³ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa but less than 76.6 kPa.” Each of the tanks V-2950 and V-2951 have a capacity greater than 151 m ³ but the true vapor pressure of the stored liquid is greater than 76.6 kPa (according to 9/11/2015 technical correspondence received from the permittee). Since the maximum true vapor pressure is greater than 76.6 kPa, this paragraph does not directly apply to tanks V-2950 and V-2951.
§60.112b(b)	8.1.2.	This paragraph is applicable since tanks V-2950 and V-2951 each have a capacity greater 75 m ³ containing a VOL that, as stored, has a maximum true vapor pressure greater than or equal to 76.6 kPa (according to technical correspondence received on 9/11/2015). Under this paragraph the permittee has to equip each storage vessel with either (1) a closed vent system and control device as specified in §60.112b(a)(3); or (2) a system equivalent to that described in paragraph (b)(1) as provided in §60.114b of this subpart. In the Attachment E for the tanks V-2950 and V-2951 the permittee listed §60.112b(b)(1) as an applicable requirement and did not list §60.114b as an applicable requirement; therefore, it has been concluded that the permittee will comply under §60.112b(b)(1). Therefore, non-applicable requirement §60.112b(b)(2) and referenced §60.114b are excluded from the permit condition.

Subpart Kb	Title V	Discussion
		Even though §60.112b(a) does not apply by itself (as discussed above), part of it (i.e., 60.112b(a)(3)) is made applicable by §60.112b(b). Further, the language from §60.112b(a)(3) is included in the permit condition since it specifies the substantive requirements for the closed vent system and control device. Therefore, §60.112b(a)(3) and §60.112b(a)(3)(i) and (ii) are included in the citation of authority.
§60.112b(c)	None	This section is not applicable since it is the site-specific standard for Merck & Co., Inc.'s Stonewall Plant in Elkton, Virginia.
Testing and procedures		
§60.113b(a)	None	This section is not applicable because the permittee is not utilizing a permanently affixed roof or internal floating roof under §60.112b(a)(1).
§60.113b(b)	None	This section is not applicable because the permittee is not utilizing an external floating roof under §60.112b(a)(2).
§60.113b(c)	None	This section is not applicable because it applies to a closed vent system and control device <i>other than a flare</i> . Since the tanks are controlled by flare FL-02, this paragraph is not applicable.
§60.113b(d)	8.1.3.	<p>These requirements are applicable to the closed vent system and a flare that will meet the requirements in §60.112b(a)(3). The requirement IBRs the general control device requirements in §§60.18 (e) and (f). The specific requirements are further analyzed below.</p> <ul style="list-style-type: none"> • §60.18(e) Flares used to comply with provisions of this subpart shall be operated at all times when emissions may be vented to them. <i>Compliance demonstrated under condition 5.1.5.c.</i> • §60.18(f)(1) Method 22 of appendix A to this part shall be used to determine the compliance of flares with the visible emission provisions of this subpart. The observation period is 2 hours and shall be used according to Method 22. <i>Compliance demonstrated under condition 5.3.1.</i> • §60.18(f)(2) the presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. <i>Compliance demonstrated under condition 5.2.1.</i> • §60.18(f)(3) The net heating value of the gas being combusted in a flare shall be calculated using the following equation: <i>Compliance demonstrated under condition 5.1.5.d.</i> • §60.18(f)(4) The actual exit velocity of a flare shall be determined by dividing the volumetric flowrate (in units of standard temperature and pressure), as determined by Reference Methods 2, 2A, 2C, or 2D as appropriate; by the unobstructed (free) cross sectional area of the flare tip. A note is added at the end of the permit condition noting that this calculation methodology is IBR⁴ into permit condition 8.1.3. by reference to §60.18(f). • §60.18(f)(5) The maximum permitted velocity, V_{max}, for flares complying with paragraph (c)(4)(iii) shall be determined by the following equation. This requirement is not applicable since the flare FL-02 is not steam-assisted or non-assisted.

⁴ U.S. EPA's Title V Permit Writer's Tips allows for IBR of calculation and test methods. Refer to http://www.epa.gov/reg3artd/permitting/t5_iar.htm which was accessed by the writer on September 2, 2015.

Subpart Kb	Title V	Discussion
		<ul style="list-style-type: none"> §60.18(f)(6) The maximum permitted velocity, V_{max}, for air-assisted flares shall be determined by the following equation. <i>Compliance demonstrated under condition 5.1.5.e.</i>
Alternative means of emission limitation		
§§60.114b(a)-(d)	None	§60.114b is not delegated to the State per §60.117b(b).
Reporting and recordkeeping requirements		
§60.115b	8.4.1.	<p>The first statement in this paragraph requires an owner or operator of an affected storage vessel to “keep records and furnish reports as required by paragraphs (a), (b), or (c) of this section depending upon the control equipment installed to meet the requirements of §60.112b.” As demonstrated below in their respective discussions, none of the paragraphs (a), (b), or (c) of §60.115b are applicable. Therefore, this first statement is not applicable.</p> <p>The second statement in this paragraph requires an owner or operator of an affected storage vessel to “keep copies of all reports and records required by this section, except for the record required by (c)(1), for at least 2 years. The record required by (c)(1) will be kept for the life of the control equipment.” §60.115b(d) is applicable; therefore, this second statement is included as a permit condition. However, as demonstrated below, 60.115b(c) is not applicable. Therefore, the language referring to (c)(1) is excluded from the permit condition.</p>
§60.115b(a)	None	This section is not applicable because the permittee is not utilizing a permanently affixed roof or internal floating roof under §60.112b(a)(1).
§60.115b(b)	None	This section is not applicable because the permittee is not utilizing an external floating roof under §60.112b(a)(2).
§60.115b(c)	None	This section is not applicable because it applies to a closed vent system and control device <i>other than a flare</i> . Since the tanks are controlled by flare FL-02, this requirement is not applicable.
§60.115b(d)	8.4.2. 8.5.1.	These requirements are applicable to the closed vent system and a flare that will meet the requirements in §60.112b(a)(3). In particular, §§60.115b(d)(1) and (3) are reporting requirements that are in permit condition 8.5.1. For the reasons discussed above concerning §60.113b(d), the non-applicable paragraph §60.18(f)(5) is excluded from permit condition 8.5.1.(1). §60.115b(d)(2) is a recordkeeping requirement that is permit condition 8.4.1.
Monitoring of operations		
§60.116b(a)	8.4.3.	This requirement is applicable since the permittee must keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel as required by §60.116b(b) for the life of the source.
§60.116b(b)	8.4.3.	This requirement is applicable since the tanks V-2950 and V-2951 meet the criteria in §60.110b(a). As stated in §60.116b(a) these records must be kept for the life of the source.
§60.116b(c)	None	Since the tanks V-2950 and V-2951 are equipped with a closed vent system and control device meeting the specification of §60.112b, the tanks are exempt from the requirements in §60.116b(c) as provided in §60.116b(g).
§60.116b(d)	None	Since the tanks V-2950 and V-2951 are equipped with a closed vent system and control device meeting the specification of §60.112b, the tanks are exempt from the requirements in §60.116b(d) as provided in §60.116b(g).

Subpart Kb	Title V	Discussion
§60.116b(e)	None	This requirement is not applicable since it pertains to storage temperature to determine the maximum true vapor pressure utilized in non-applicable paragraph §60.116b(d). As such, this paragraph is not applicable.
§60.116b(f)	None	The tanks V-2950 and V-2951 are not utilized to store a waste mixture of indeterminate or variable composition; therefore, the requirements of this paragraph are not applicable.
§60.116b(g)	None	The tanks V-2950 and V-2951 meet the criteria of this paragraph; therefore, the tanks are exempt from the requirements in §§60.116b(c) and (d).

XI. **40 C.F.R. 60 Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution.** This subpart 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. A permittee is subject to the applicable provisions of this subpart if the permittee is the owner or operator of one or more of the onshore affected facilities listed in §§60.5365(a) through (g). In this case, the affected facility to which this subpart applies is the group of all equipment, except compressors, within a process unit, as specified in §60.5365(f). The Moundsville Fractionation Plant is a natural gas processing plant that was modified after August 23, 2011. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants would apply to the Moundsville Fractionation Plant.

The following facilities and equipment are not located at the Moundsville Fractionation Plant or are not subject to the requirements of this subpart for the reasons given:

§60.5365(a) - Each gas well affected facility, which is a single natural gas well.

There are no gas wells at this facility. Therefore, all requirements regarding gas well affected facilities under 40 CFR 60 Subpart OOOO do not apply.

§60.5365(b) - Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your centrifugal compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

There are no centrifugal compressors at the Moundsville Fractionation Plant. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOO do not apply.

§60.5365(c) - Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your reciprocating compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

There are no reciprocating compressors located at the Moundsville Fractionation Plant. Therefore, all requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOO do not apply.

§60.5365(d) - Pneumatic Controllers. Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller which commenced construction after August 23, 2011, and is located at a natural gas processing plant.

There are no continuous bleed gas-driven pneumatic controllers at the Moundsville Fractionation Plant. Therefore, there are no applicable requirements regarding pneumatic controllers under 40 CFR 60 Subpart OOOO that apply.

§60.5365(e) - Each storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment. 40 C.F.R. 60 Subpart OOOO defines a storage vessel as a unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. The following are not considered storage vessels:

- Vessels that are skid-mounted or permanently attached to something that is mobile (such as trucks, railcars, barges or ships), and are intended to be located at a site for less than 180 consecutive days. If the source does not keep or are not able to produce records, as required by §60.5420(c)(5)(iv), showing that the vessel has been located at a site for less than 180 consecutive days, the vessel described herein is considered to be a storage vessel since the original vessel was first located at the site.
- Process vessels such as surge control vessels, bottoms receivers or knockout vessels.
- Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere.

This rule requires that the permittee determine the VOC emission rate for each storage vessel affected facility utilizing a generally accepted model or calculation methodology within 30 days of startup, and minimize emissions to the extent practicable during the 30 day period using good engineering practices. For each storage vessel affected facility that emits more than 6 tpy of VOC, the permittee must reduce VOC emissions by 95% or greater within 60 days of startup. The compliance date for applicable storage vessels is October 15, 2013. Based on a letter from USEPA to the American Petroleum Institute dated September 28, 2012, the applicability of storage vessels to this reduction requirement of Subpart OOOO is based on each individual tank's PTE (which includes federally enforceable control devices) as compared to the 6 tons/year⁵.

Based upon these facts, the three (3) new pressurized 90,000 gallons Stabilized Condensate Tanks are exempt from Subpart OOOO as these tanks are designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere. The two (2) modified 454,000 gallons natural gasoline storage tanks have VOC emissions, after control by the flare, of less than 6 tons/year of VOCs. The other storage vessels located at the Moundsville Fractionation Plant emit less than 6 tpy of VOC. Therefore, Williams is not required by Subpart OOOO to reduce VOC emissions by 95%.

§60.5365(g) - Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

- Each sweetening unit that processes natural gas is an affected facility; and
- Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.
- Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423(c) but are not required to comply with §§60.5405 through 60.5407 and paragraphs §§60.5410(g) and 60.5415(g) of this subpart.

⁵ Refer to the discussion of NSPS Subpart OOOO in the Engineering Evaluation/Fact Sheet for permit R13-2892D.

- Sweetening facilities producing acid gas that is completely reinjected into oil-or-gas-bearing geologic strata or that is otherwise not released to the atmosphere are not subject to §§60.5405 through 60.5407, 60.5410(g), 60.5415(g), and 60.5423 of this subpart.

There are no sweetening units at the Moundsville Fractionation Plant. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO do not apply.

Applicable section §60.5365(f) describes the permittee’s affected facility, which is the group of all equipment, except compressors, within a process unit (and further defined by §§60.5365(f)(1)-(3)). The table below sets out the various sections of the regulation and details why requirements either are, or are not, applicable to the facility and describes how the applicable requirements are incorporated into the Title V permit. Note that most applicable requirements have been incorporated into the Title permit via NSR permit R13-2892D (discussed above). Those applicable sections not included in the NSR permit are emphasized with bold font in the table below. Also, where occurring, the regulation language “this subpart” is changed to “40 C.F.R. 60 Subpart OOOO” in the permit condition unless otherwise noted.

Subpart OOOO	Title V	Discussion
§60.5370(a)	6.2.1.	In this case the applicable compliance date is upon startup. The requirement is already contained in applicable sections §§60.5410 and 60.5410(f) that have been incorporated via R13-2892D. Therefore, this section will be cited with condition 6.2.1.
§60.5370(b)	6.1.7.	This section specifies the non-applicability of an SSM exemption for Subpart OOOO; therefore, it is included in the permit.
§60.5375	None	This section applies to gas well affected facilities specified under §60.5365(a); therefore, for the reasons detailed in the preceding discussion, this section is non-applicable.
§60.5380	None	This section applies to centrifugal compressor affected facilities specified under §60.5365(b); therefore, for the reasons detailed in the preceding discussion, this section is non-applicable.
§60.5385	None	This section applies to reciprocating compressor affected facilities specified under §60.5365(c); therefore, for the reasons detailed in the preceding discussion, this section is non-applicable.
§60.5390	None	This section applies to pneumatic controller affected facilities specified under §60.5365(d); therefore, for the reasons detailed in the preceding discussion, this section is non-applicable.
§60.5395	None	This section applies to storage vessel affected facilities specified under §60.5365(e); therefore, for the reasons detailed in the preceding discussion, this section is non-applicable.
§60.5400	6.1.4.	This section sets equipment leak standards for onshore natural gas processing plants. These applicable requirements have been incorporated via permit R13-2892D.
§60.5401	6.1.5.	This section specifies exceptions to the equipment leak standards for onshore natural gas processing plants. These applicable requirements have been incorporated via permit R13-2892D.
§60.5402	6.1.6.	This section specifies alternative emission limitations for the equipment leak standards from onshore natural gas processing plants. These applicable requirements have been incorporated via permit R13-2892D.
§§60.5405, 60.5406, 60.5407, and 60.5408	None	This section applies to sweetening units specified under §60.5365(g); therefore, for the reasons detailed in the preceding discussion, this section is non-applicable.

Subpart OOOO	Title V	Discussion
§§60.5410(a)-(e), (g), (h), and (i)	None	These sections apply to facilities that are not located at or utilized at the permittee's facility; therefore, for the reasons detailed in the preceding discussion, these sections are non-applicable. Note that §60.5410(e) is not applicable since it is reserved.
§60.5410(f)	6.2.1.	This section defines how initial compliance is demonstrated for equipment leak standards for onshore natural gas processing plants. These applicable requirements have been incorporated via permit R13-2892D. A parenthetical reference to condition 6.1.4. has been added.
§60.5411	None	This section applies to closed vent systems on storage vessels and centrifugal compressor affected facilities specified under §§60.5365(b) and (e); therefore, for the reasons detailed in the preceding discussion, this section is non-applicable.
§§60.5412 and 60.5413	None	These sections apply to control devices for storage vessels and centrifugal compressor affected facilities specified under §§60.5365(b) and (e); therefore, for the reasons detailed in the preceding discussion, this section is non-applicable.
§§60.5415(a)-(e), and (g)	None	These sections apply to facilities that are not located at or utilized at the permittee's facility; therefore, for the reasons detailed in the preceding discussion, these sections are non-applicable.
§60.5415(f)	6.3.1.	This section defines how continuous compliance is demonstrated for VOC requirements for onshore natural gas processing plants. These applicable requirements have been incorporated via permit R13-2892D. A parenthetical reference to condition 6.1.4. has been added.
§60.5416	None	This section applies to closed vent systems on storage vessels, centrifugal compressor, and reciprocating compressor affected facilities specified under §§60.5365(b), (c), and (e); therefore, for the reasons detailed in the preceding discussion, this section is non-applicable.
§60.5417	None	This section applies to storage vessel and centrifugal compressor affected facilities specified under §§60.5365(b) and (e); therefore, for the reasons detailed in the preceding discussion, this section is non-applicable.
§60.5420(a)	6.5.1.	These applicable requirements of §60.5420(a)(2) have been incorporated via permit R13-2892D.
§60.5420(b)	6.5.2.	These applicable requirements of this section have been incorporated via permit R13-2892D.
§60.5420(c)	None	This section applies to affected facilities of which there are none at the facility; therefore, for the reasons detailed in the preceding discussion, this section is non-applicable.
§60.5421	6.4.1.	These applicable requirements of §60.5421 have been incorporated via permit R13-2892D.
§60.5422	6.5.3.	These applicable requirements of §60.5422 have been incorporated via permit R13-2892D.
§60.5423	None	This section applies to sweetening units of which there are none at the facility; therefore, this section is non-applicable.

Non-Applicability Determinations

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

- a. **45CSR14 – Permits for Construction and Major Modification of Major Stationary Sources for the Prevention of Significant Deterioration of Air Quality.** The facility permitted under R13-2892D, and incorporated into the initial Title V permit, is not subject to Prevention of Significant Deterioration (PSD) requirements as determined in the Engineering Evaluation for permit R13-2892D. Specifically, there is no significant increase or net increase for a pollutant that exceeds its significance threshold.
- b. **45CSR19 – Permits for Construction and Major Modification of Major Stationary Sources which Cause or Contribute to Nonattainment Areas.** The Moundsville Fractionation Plant is located in Marshall County, which is a non-attainment county for PM_{2.5} (surrogate for NO_x and SO₂), therefore the Moundsville Fractionation Plant is potentially subject to 45CSR19. However, the facility is not subject to 45CSR19 as determined in the Engineering Evaluation for permit R13-2892D. Specifically, no potential to emit for a pollutant exceeds its significance threshold.
- c. **45CSR21 – Control of VOC Emissions.** The facility is not located in Putnam, Kanawha, Cabell, Wayne, or Wood counties (45CSR§21-1.1.); therefore, this rule is not applicable.
- d. **45CSR27 – Control of TAP Emissions.** This rule applies to chemical processing units (45CSR§27-3.1.). The definition of “Chemical Processing Unit” excludes 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 (45CSR§27-2.4.). Based upon the information provided in the application and in August 31, 2015, technical correspondence from the permittee, the facility does not utilize an assembly of reactors, tanks, distillation columns, heat exchangers, vaporizers, compressors, dryers, decanters, and/or other equipment used to treat, store, manufacture, or use toxic air pollutants. Further, there are no “chemical processing units” at the Moundsville Fractionation Plant because the equipment does not produce or contact materials containing more than 5% benzene by weight. For these reasons, 45CSR27 is not applicable to the Moundsville Fractionation Plant.
- e. **40 C.F.R. 60 Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators.** There is no fossil-fuel-fired steam generating unit greater than 250 MMBtu/hr (40 C.F.R. §60.40(a)(1)) at the site; therefore, this regulation is not applicable.
- f. **40 C.F.R. 60 Subpart Da – Standards of Performance for Electric Utility Steam Generating Units.** There is no electric utility steam generating unit greater than 250 MMBtu/hr (40 C.F.R. §60.40Da(a)(1)) at the site; therefore, this regulation is not applicable.
- g. **40 C.F.R. 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.** There is no steam generating unit greater than 100 MMBtu/hr (40 C.F.R. §60.40b(a)) at the site; therefore, this regulation is not applicable.
- h. **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.** There is no tank at the facility that was constructed before May 19, 1978 (40 C.F.R. §60.110(c)); therefore, this regulation is not applicable.
- i. **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.** There is no tank at the facility that was constructed before July 23, 1984 (40 C.F.R. §60.110a(a)); therefore, this regulation is not applicable.

- j. **40 C.F.R. 60 Subpart GG – Standards of Performance for Stationary Gas Turbines.** There is no stationary gas turbine at the facility (40 C.F.R. §60.330(a)); therefore, this regulation is not applicable.
- k. **40 C.F.R. 60 Subpart KKK – Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants.** 40 C.F.R. 60 Subpart KKK applies to onshore natural gas processing plants that commenced construction after January 20, 1984 and on or before August 23, 2011. The modifications to the Moundsville Fractionation Plant approved in permits R13-2892C and R13-2892D occurred after August 23, 2011. The permittee will be required to meet the LDAR requirements of Subpart OOOO for natural gas processing facilities. Therefore, the permittee will no longer be subject to 40 C.F.R. 60 Subpart KKK and will be subject to 40 C.F.R. 60 Subpart OOOO.
- l. **40 C.F.R. 60 Subpart LLL – Standards of Performance for SO₂ Emissions From Onshore Natural Gas Processing for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011.** There is no sweetening unit at the facility (40 C.F.R. §60.640(a)); therefore, this regulation is not applicable.
- m. **40 C.F.R. 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.** There is no compression ignition engine at the facility (40 C.F.R. §60.4200(a)); therefore, this regulation is not applicable.
- n. **40 C.F.R. 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines.** There is no stationary combustion turbine at the facility (40 C.F.R. §60.4305(a)); therefore, this regulation is not applicable.
- o. **40 C.F.R. 63 Subpart HH – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.** This facility that is an area source of HAP and there is no triethylene glycol (TEG) dehydration unit (40 C.F.R. §63.760(b)(2)); therefore, this regulation is not applicable.
- p. **40 C.F.R. 63 Subpart HHH – National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities.** There are no natural gas transmission and storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user. Further, the facility is an area source of HAP (40 C.F.R. §63.1270(a)). Therefore, this regulation is not applicable.
- q. **40 C.F.R. 63 Subpart YYYY – National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines.** There is no stationary combustion turbine at the facility (40 C.F.R. §§63.6080(a) and 63.6085); therefore, this regulation is not applicable.
- r. **40 C.F.R. 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters.** The facility is an area source of HAP (40 C.F.R. §63.7480); therefore, this regulation is not applicable.
- s. **40 C.F.R. 63 Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.** There are only gas-fired boilers at the facility which are not subject to requirements of this regulation (40 C.F.R. §63.11195(e)); therefore, this regulation is not applicable.
- t. **40 C.F.R. Part 64 – Compliance Assurance Monitoring (CAM).** Although there are potential pollutant specific emission units subject to an emissions limitation, and a control device (i.e., Process Flare FL-02) is used to achieve compliance, the potential pre-control emissions of each pollutant from the source do not exceed the respective major source thresholds (40 C.F.R. §64.2(a)(3)). Therefore, CAM is not applicable.

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: September 23, 2015

Ending Date: October 23, 2015

Point of Contact

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

Denton B. McDerment, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1221 • Fax: 304/926-0478
denton.b.mcderment@wv.gov

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)

Public Comments

On October 23, 2015, the permittee submitted comments on the draft permit by providing the writer with an edited version of the electronic permit document. This writer has described those comments below and provided a response for each.

Comment #1

In Section 1.1., in the row for Stabilized Condensate Tanks, change the year installed from 2015 to 2014.

DAQ Response to Comment #1

The change has been made.

Comment #2

Strike draft permit condition 5.2.3. as it is no longer present in R13-2892D.

DAQ Response to Comment #2

The requirement has been removed from the operating permit.

Comment #3

In draft permit condition 5.3.1. strike the language “or from the lecture portion of 40 CFR part 60, appendix A, Method 9 certification course.”

DAQ Response to Comment #3

The language has been removed from the operating permit to reflect R13-2892D.

Comment #4

In draft permit condition 5.3.2. replace the language “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” with “appropriate test methods or other equivalent testing as approved in writing by the Director.”

DAQ Response to Comment #4

The language has been revised in the operating permit to reflect R13-2892D.

Comment #5

Strike draft permit condition 5.3.3. as it is no longer present in R13-2892D.

DAQ Response to Comment #5

The requirement has been removed from the operating permit. The numbering of draft permit condition 5.3.4. has been changed to 5.3.3. and has been documented in the Fact Sheet discussion of 45CSR6.

Comment #6

In draft permit condition 5.4.4. strike the language “and testing requirements of 5.3.”

DAQ Response to Comment #6

The language has been removed from the operating permit to reflect R13-2892D.

U.S. EPA Comments

No comments were received from U.S. EPA.

Other Changes

The date of issuance for R13-2892D has been added to the table in subsection 1.2.