West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

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

Permit Number: R30-04100013-2018
Application Received: January 23, 2017
Plant Identification Number: 03-54-04100013
Permittee: Dominion Energy Transmission, Inc.
Facility Name: Lightburn Station
Mailing Address: 925 White Oaks Blvd.
Bridgeport, WV 26330

Physical Location: Jane Lew, Lewis County, West Virginia
UTM Coordinates: 547.54 km Easting • 4331.11 km Northing • Zone 17
Directions: From Charleston take I-79N to Jane Lew. Take Exit 105 (Jane Lew Exit) and make a left on County Road 7 (Berkin-Jane Lew Road). Stay on CR-7 until it intersects Route 19 (Main Avenue). Make a right on Route 19 and make the immediate left on Broad Run Road. Stay on Broad Run Road until it intersects County Road 1 (Old Mill Road/Fork River Road/Jacksons Mill Road) and make a right. Stay on CR 1 for about 500 yards and Lightburn Station is on the right.

Facility Description
The Lightburn Station consists of a natural gas extraction plant, Lightburn Extraction Plant (LEP), and a compressor station, Lightburn Compressor Station (LCS). LEP is located adjacent to LCS. The LEP and LCS are located on contiguous property and are under common control. However, the plants do not belong to the same industrial grouping (SIC). The LCS operates under SIC Code 4922 (Pipeline Transmission of Natural Gas), and the LEP operates under SIC Code 1321 (Natural Gas Liquid Extraction).
Lightburn Compressor Station (LCS)
The emission units at LCS consist of two (2) 2,000 HP natural gas fired reciprocating engines (EN01, EN02), three (3) 4,000 HP natural gas fired reciprocating engines (EN03, EN04, EN05), two (2) 6,060 HP natural gas fired reciprocating engines (EN06, EN07), one (1) 1,085 HP auxiliary generator (AUX02), two (2) dehydration unit stills (DEHY01, DEHY02), two (2) boilers (BLR01, BLR02), one (1) heater (HTR01), two (2) reboilers (RBR01, RBR02), two (2) dehydration unit flares (F1, F2), and twenty-six (26) tanks of various sizes.

Lightburn Extraction Plant (LEP)
The emission units at LEP consist of two (2) 3,550 HP natural gas fired reciprocating engines (EN08, EN09), two (2) 216 HP fire pump engines (EN10, EN11), four (4) 60,000-gallon aboveground natural gas liquid storage tanks (008-01, 008-02, 008-03, 008-04), two (2) natural gas liquid loading racks (009-01, 009-02), one (1) emergency and maintenance flare (FLARE3), two (2) 290-gallon aboveground diesel fuel storage tanks (014-01, 014-02), one (1) 254 HP emergency generator (012-01), and eleven (11) tanks of various sizes. The natural gas capacity of the LEP is 52 MMSCFD, and the plant is estimated to produce 2,244 barrels/day of natural gas liquids. The LEP receives natural gas from the existing Kennedy Compressor Station and Wymer Junction.

This renewal permit also includes changes from significant modification (SM02) which incorporates changes from R13-2823E (issued 2/27/17). R13-2823E covers corrections made in permit language and conditions.

Emissions Summary

<table>
<thead>
<tr>
<th>Plantwide Emissions Summary [Tons Per Year]</th>
<th>Regulated Pollutants</th>
<th>Potential Emissions</th>
<th>2016 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>1,087.20</td>
<td>264.83</td>
<td></td>
</tr>
<tr>
<td>Nitrogen Oxides (NOₓ)</td>
<td>2,497.97</td>
<td>289.62</td>
<td></td>
</tr>
<tr>
<td>Particulate Matter (PM₂.₅)</td>
<td>35.57</td>
<td>0.53</td>
<td></td>
</tr>
<tr>
<td>Particulate Matter (PM₁₀)</td>
<td>35.57</td>
<td>2.55</td>
<td></td>
</tr>
<tr>
<td>Total Particulate Matter (TSP)</td>
<td>46.27</td>
<td>5.02</td>
<td></td>
</tr>
<tr>
<td>Sulfur Dioxide (SO₂)</td>
<td>0.73</td>
<td>0.20</td>
<td></td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>542.34</td>
<td>119.90</td>
<td></td>
</tr>
</tbody>
</table>

\( PM₁₀ \) is a component of TSP.

<table>
<thead>
<tr>
<th>Hazardous Air Pollutants</th>
<th>Potential Emissions</th>
<th>2016 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Formaldehyde</td>
<td>51.06</td>
<td>11.75</td>
</tr>
<tr>
<td>Acrolein</td>
<td>7.43</td>
<td>1.70</td>
</tr>
<tr>
<td>Acetaldehyde</td>
<td>8.21</td>
<td>1.80</td>
</tr>
<tr>
<td>Benzene</td>
<td>1.72</td>
<td>0.40</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>0.25</td>
<td>0.02</td>
</tr>
<tr>
<td>Hexane</td>
<td>0.85</td>
<td>0.24</td>
</tr>
<tr>
<td>Toluene</td>
<td>0.98</td>
<td>0.20</td>
</tr>
<tr>
<td>Hazardous Air Pollutants</td>
<td>Potential Emissions</td>
<td>2016 Actual Emissions</td>
</tr>
<tr>
<td>-------------------------</td>
<td>---------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>Xylene</td>
<td>0.50</td>
<td>0.09</td>
</tr>
</tbody>
</table>

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 1,087.20 tons per year of Carbon Monoxide; 2,497.97 tons per year of Nitrogen Oxides; 542.34 tons per year of Volatile Organic Compounds; 51.06 tons per year of Formaldehyde; and 71.0 tons per year of aggregate Hazardous Air Pollutants. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Dominion Transmission's Lighthburn Station 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 Opacity Requirements for boilers
45CSR6 Open burning prohibited.
45CSR10 Sulfur requirements for fuel burned
45CSR11 Standby plans for emergency episodes.
45CSR13 Permits for Construction, Modification, Relocation and Operation of Stationary Sources
45CSR14 Prevention of significant deterioration
45CSR16 Standard of Performance for new Stationary Sources
WV Code § 22-5-4 (a) (14) The Secretary can request any pertinent information such as annual emission inventory reporting.
45CSR30 Operating permit requirement.
45CSR 34 Emission Standards for Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63
40 C.F.R. Part 61 Asbestos inspection and removal
40 C.F.R. Part 82, Subpart F Ozone depleting substances
40 C.F.R. 60 Subpart III Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
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 VV Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for
which Construction, Reconstruction, or Modification Commenced After January 5, 1981, and on or Before November 7, 2006

40 C.F.R. 60 Subpart JJJJ NSPS for Stationary Spark Ignition IC Engines
40 CFR Part 63, Subpart ZZZZ RICE MACT
40 C.F.R. 63 Subpart HHH Natural Gas Transmission and Storage Facilities MACT
40 C.F.R. 63 Subpart DDDDD Boiler MACT

State Only:

45CSR4 No objectionable odors.
45CSR17 Control fugitive particulate matter

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

<table>
<thead>
<tr>
<th>Permit or Consent Order Number</th>
<th>Date of Issuance</th>
<th>Permit Determinations or Amendments That Affect the Permit (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>R13-2823E</td>
<td>February 27, 2017</td>
<td></td>
</tr>
<tr>
<td>R14-0009E</td>
<td>January 7, 2009</td>
<td></td>
</tr>
</tbody>
</table>

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

The significant modification (SM02) includes the following changes (from R13-2823E) in this permit.

- Compressor Engines (EN08 and EN09)- (Emission Unit IDs-006-01, 006-02)
  Old conditions 7.1.22, 7.1.23, 7.1.25, 7.1.27, 7.1.28, 7.1.30, and 7.4.8.b were removed from the permit.
  Condition 7.1.24 was updated. The 40CFR60 Subpart JJJJ requirements in R13-2823E were updated with applicable and current subpart JJJJ requirements and as a result, these conditions were deleted.

- Diesel Fire Pumps (EN10 and EN11)- (Emission Unit IDs-007-01, 007-02)
  Old conditions 7.1.5, 7.1.6, 7.1.9, 7.1.11, 7.1.12, 7.1.13, 7.1.14, 7.1.15, 7.1.17, 7.1.20, 7.3.1, 7.3.2, 7.3.3, 7.3.4, 7.3.5, 7.3.6, 7.3.7, 7.3.8, 7.4.5, 7.4.6 and 7.4.7 were removed from the permit. The 40CFR60 Subpart III requirements in R13-2823E were updated with applicable and current subpart III requirements and as a result, these conditions were deleted.
• Section 6.0 of R13-2823E was removed. These requirements were for the Regenerator Heater (010-01) which was already removed from the Title V permit. However, this resulted in renumbering of the remaining R13-2823E requirements and changes to Title V citations.

• Recordkeeping requirements in condition 7.4.2 were revised to match the changes approved in R13-2823E.

• Old permit conditions 11.1.3, 11.3.3 and 11.4.6 imply that the emergency and maintenance flare (FLARE3) is subject to either NESHAP Subpart HH or HHH. To be subject to one of these NESHAP rules, a glycol dehydration unit must be installed at the facility. FLARE3 is not subject to either NESHAP regulation as there is not a glycol dehydration unit installed at the Lightburn Extraction Plant. FLARE3 is at the facility to control VOC emissions from emergency venting and during various non-routine maintenance activities of four (4) tanks (008-01 thru 008-04) and two (2) loading racks (009-01 and 009-02). Therefore, these conditions were removed from the permit and section 11.0 was renumbered.

• There is no change in potential emissions associated with the significant modification.

Per company’s request, the following changes were made in various sections and conditions in the Title V permit:

• BLR01 — This boiler was previously listed as having a manufacturer model number of CB786-250, but the correct model number is CB-700X-250-15ST. The correction was made in the Emission Unit Table.

• HTR01 — This unit was previously listed as a boiler, but the correct description is a heater. The heater was previously listed as having a manufacturer model number of 4X6-27Y, but the correct model number is DWG.A-14724. The correction was made in the Emission Unit Table.

• 014-03 — Methanol Storage Tank for De-icing has been removed from the facility so it was deleted from the Emission Unit Table.

• Added the following existing tanks to the Emission Units Table for Lightburn Compressor Station: TK01, TK02, TK03, TK04, TK05, TK06, TK07, TK08, TK09, TK10, TK11, TK12, TK13, TK14, TK15, TK16, TK17, TK18, TK19, TK20, TK21, TK22, TK23, TK24, TK25, TK26. Added the following tanks to the Emission Units Table for Lightburn Extraction Plant: TK08, TK09, TK10, TK11, TK12, TK13, TK14, TK15, TK16, TK17, TK18.

• Permit Conditions 3.1.9, 3.1.10, 3.1.11, 3.1.12, 3.1.13, 3.2.1, 3.2.2, 3.3.2, and 3.4.4 were removed from the facility-wide section (Section 3) and moved to a source-specific section as conditions 7.1.23, 7.1.24, 7.1.25, 7.1.26, 8.1.2, 7.2.1, 7.2.2, 7.3.3 and 7.4.8 respectively. Section 3 and section 7 were renumbered because of these changes.

• Condition 3.1.15 was removed as this requirement does not apply to the auxiliary generator (AUX02). Per §63.6590(b)(3)(iii), AUX02 does not have to meet the requirements of 40 CFR 63 Subpart ZZZZ since it is a 1,085 hp existing emergency RICE located at a major source.

• Appendix A — The two (2) dehydration units are subject to NESHAP Subpart HHH and have installed two (2) enclosed combustion devices per §63.1281(d)(1)(i)(A). Since F1 and F2 are "enclosed combustion devices," they do not meet the definition of "flare" as defined in §63.1271. Therefore, Appendix A (which included "Flare" requirements) was removed from the permit and all "enclosed combustion device" requirements were included in a source-specific section (section 5) of this permit as conditions 5.1.8, 5.1.10, 5.1.11, 5.1.12, 5.1.13, 5.1.14, 5.2.4, 5.2.5, 5.2.6, 5.2.7, 5.4.2, and 5.5.2.
• Appendix B — Since Fl and F2 are considered "enclosed combustion devices" per NESHAP Subpart HHH, §63.11 flare conditions do not apply. Therefore, Appendix B was removed from the permit.

• Requirements 4.1.6, 4.4.2 and 4.5.1— the placeholder language for the 40 C.F.R. 63 Subpart DDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, was replaced with the requirements of this subpart (under conditions 4.1.6, 4.4.2 and 4.5.1) and applicable to the Emission Point IDs- BLR01, BLR02 and HTR01.

<table>
<thead>
<tr>
<th>Boiler Emission Unit ID</th>
<th>Emission Point ID</th>
<th>Design Capacity, mmBtu/hr</th>
<th>Boiler Subcategory</th>
<th>Year installed</th>
</tr>
</thead>
<tbody>
<tr>
<td>005-01</td>
<td>BLR01</td>
<td>10.461</td>
<td>Natural gas-fired boiler</td>
<td>1969</td>
</tr>
<tr>
<td>005-02</td>
<td>BLR02</td>
<td>5.5</td>
<td>Natural gas-fired boiler</td>
<td>2009</td>
</tr>
<tr>
<td>005-03</td>
<td>HTR01</td>
<td>4.0</td>
<td>Natural gas-fired fuel gas heater</td>
<td>1967</td>
</tr>
</tbody>
</table>

Conditions 4.1.6, 4.4.2 and 4.5.1 were added to include applicable emission limitations, recordkeeping and reporting requirements of the subpart.

Non-Applicability Determinations

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


40 C.F.R. §60.110b(d)(2) states that this subpart does not apply to pressure vessels designed to operate in excess of 204.9kPa (29.7 psi) and without emissions to the atmosphere. The Horizontal Natural Gas Liquid Storage Tanks at the Lightburn Extraction Plant (Em. Unit IDs: 008-01, 008-02, 008-03, 008-04) will be operated at 225 psi and do not vent to atmosphere since their emissions are controlled by FLARE3. The Horizontal Aboveground Drip/Condensate Tank (Emission Unit ID: TK09-LEP) is also operated above 204.9kPa. Since these tanks do not meet the applicability criteria they are not subject to this rule. The Lightburn compressor station tanks in the Emission Unit Table (Em. Unit IDs: TK01, TK02, TK03, TK04, TK05, TK06, TK07, TK08-LCS, TK09-LCS, TK10-LCS, TK11-LCS, TK12-LCS, TK13-LCS, TK14-LCS, TK15-LCS, TK16-LCS, TK17-LCS, TK18, TK19, TK20, TK21, TK22, TK23, TK26) and Lightburn Extraction Plant tanks in the Emission Unit Table (Em. Unit IDs: TK08-LEP, TK10-LEP through TK17-LEP, 014-01 and 014-02) are of design capacity less than 75 cubic meters. Since these tanks do not meet the applicability criteria of §60.110b(a), they are not subject to this rule. Tanks TK24 and TK25 at the Lightburn Compressor Station are vessels with a design capacity of less than or equal to 1,589.874 cubic meters used for petroleum or condensate and exempt per 40 C.F.R. §60.110b(d)(4).

40 C.F.R. Part 60 Subpart LLL – Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions. According to 40 C.F.R. §60.640(a), this rule applies to the following affected facilities: each sweetening unit, and each sweetening unit followed by a sulfur recovery unit. There are no sweetening units at the Lightburn Extraction Plant (LEP). The remaining applicability criteria §§60.640(b) through (e) all apply to affected
facilities (i.e., sweetening units). Since there are no sweetening units, none of these criteria make the rule applicable. Since the facility does not meet the applicability criteria, this rule does not apply to the Lightburn Extraction Plant (LEP).

40 C.F.R. Part 63 Subpart HH – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. Under the definition of “Facility” in 40 C.F.R. §63.761 and in accordance with U.S. EPA Applicability Determination Index (ADI) # M050022, HAP emissions from the Lightburn Extraction Plant (LEP) are not to be aggregated with the Lightburn Compressor Station (LCS) to determine HAP status (major/minor) under Subpart HH. Based upon the potential HAP emissions for the LEP, the LEP is an area source of HAPs. According to 40 C.F.R. §63.760(b)(2), the affected source for area sources includes each triethylene glycol (TEG) dehydration unit, of which there are none at LEP. In accordance with 40 C.F.R. §63.760(d), if there are no affected sources at the facility, then the facility is not subject to Subpart HH. The Lightburn Compressor Station is also not subject to this Subpart as it is characterized as a natural gas transmission and storage facility, which does not meet the definition of “Facility”.

40 C.F.R. Part 63 Subpart EEEE - National Emission Standards for Hazardous Air Pollutants: Organic Liquids Distribution (Non-Gasoline). The Lightburn Extraction Plant (LEP) is a natural gas production facility, as the term “facility” is defined in §63.761 of 40 C.F.R. 63 Subpart HH; and the Lightburn Compressor Station (LCS) is a natural gas transmission and storage facility, as the term “facility” is defined in §63.1271 of 40 C.F.R. 63 Subpart HHH. Therefore, Lightburn Station is not subject to Subpart EEEE since it meets the criteria of 40 C.F.R. §§63.2334(c)(1) and (2).

40 C.F.R. Part 64 – Compliance Assurance Monitoring (CAM). The table below sets forth the non-applicability determinations for multiple emission units integral to the Lightburn Station.

<table>
<thead>
<tr>
<th>Em. Unit ID</th>
<th>Pollutant</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>001-01 through 001-07, 002-02, 005-01, 005-02, 005-03, 005-04, 005-05</td>
<td>Various</td>
<td>These Emission Units do not have any control; Therefore, in accordance with 40 C.F.R § 64.2(a)(2), CAM is not applicable to these emission units.</td>
</tr>
<tr>
<td>004-01, 004-02</td>
<td>VOC, HAPs</td>
<td>These Emission Units have flares to control VOC and HAPs, but the only limitations for these come from 40 C.F.R 63 Subpart HHHH which is exempt from CAM per §64.2(b)(1)(i).</td>
</tr>
<tr>
<td>Em. Unit ID</td>
<td>Pollutant</td>
<td>Rationale</td>
</tr>
<tr>
<td>-----------------</td>
<td>-----------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>006-01, 006-02</td>
<td>CO, VOC</td>
<td>For each of the <strong>Caterpillar G3612 engines</strong> (Em. Unit IDs: 006-01, 006-02) uncontrolled potential emissions of CO and VOC are 94.18 tpy and 22.26 tpy, respectively. These pre-control device PTEs are less than the major source threshold of 100 tpy. Since the applicability criterion at 40 C.F.R. §64.2(a)(3) is not met, CAM does not apply to the engines on a pollutant-specific basis for pollutants CO and VOC. A control device is not employed to control NOx emissions from the <strong>Caterpillar G3612 engines</strong> (Em. Unit IDs: 006-01, 006-02). According to the manufacturer’s data supplied in Attachment M of the application, NOx emissions are unaffected by the oxidation catalyst employed to reduce CO and VOC emissions. The applicability criterion at 40 C.F.R. §64.2(a)(2) is not met, and thus CAM does not apply on a pollutant-specific basis for NOx emitted from the engines. Furthermore, potential NOx emissions from each engine are 17.124 tpy, which is less than the major source threshold. Thus, even if a NOx control device were used, the engines would still not meet applicability criterion at 40 C.F.R. §64.2(a)(3) for NOx. The <strong>Caterpillar G3612 engines</strong> (Em. Unit IDs: 006-01, 006-02) are subject to an emission limitation for formaldehyde, which meets applicability criterion §64.2(a)(1). An oxidation catalyst controls formaldehyde emissions to meet the limitation, which meets applicability criterion §64.2(a)(2). According to the application, the uncontrolled potential emissions of formaldehyde from each of the Caterpillar G3612 engines are 13.70 tpy, which exceeds the major source threshold of 10 tpy of a single HAP. Thus all applicability criteria §§64.2(a)(1) through (3) are met. However, emissions of formaldehyde from the engines are subject to 40 C.F.R. 63 Subpart ZZZZ. Therefore, the criterion at §64.2(b)(1)(i) for an exemption is met and CAM does not apply to the Caterpillar G3612 engines (Em. Unit IDs: 006-01, 006-02) for formaldehyde.</td>
</tr>
<tr>
<td>007-01, 007-02</td>
<td>Various</td>
<td>The <strong>John Deere Co. Fire Pump engines</strong> (Em. Unit IDs: 007-01, 007-02) are subject to emission limitations for various pollutants; however no air pollution control device is employed to achieve compliance with such limitations. Therefore, CAM does not apply to these engines since they do not meet the applicability criterion at 40 C.F.R. §64.2(a)(2).</td>
</tr>
<tr>
<td>Em. Unit ID</td>
<td>Pollutant</td>
<td>Rationale</td>
</tr>
<tr>
<td>------------</td>
<td>-----------</td>
<td>-----------</td>
</tr>
<tr>
<td>008-01, 008-02, 008-03, 008-04</td>
<td>VOC</td>
<td>The Horizontal Natural Gas Liquids Storage Tanks (Em. Unit IDs: 008-01, 008-02, 008-03, 008-04) are subject to an emission limitation or standard. The standard is the maximum throughput limitation of permit R13-2823, 7.1.1. This is determined since part of the definition of Emission limitation or standard at §64.1 is that “An emission limitation or standard may also be expressed either as a work practice, process or control device parameter, or other form of specific design, equipment, operational, or operation and maintenance requirement.” The throughput limitation is considered an operational standard; therefore, the applicability criterion at §64.2(a)(1) is met. The tanks are pressurized vessels under normal operations, and the tanks are only vented to control device FLARE3 during emergency situations or non-routine maintenance activities. Thus, the control device is not employed during normal operations. More importantly, the FLARE3 is not employed to achieve compliance with the throughput limitation. Therefore, applicability criterion §64.2(a)(2) is not met and CAM does not apply to the tanks.</td>
</tr>
<tr>
<td>FLARE3</td>
<td>Various</td>
<td>The Emergency and Maintenance Flare (Control Device ID: FLARE3) controls VOC emissions from (i) absorber draining; and (ii) emergency episodes of venting the Horizontal Natural Gas Liquids Storage Tanks. The flare pilot runs continuously through all times. None of the PTEs of any pollutant emitted from the flare exceed the major source threshold. Therefore, applicability criterion §64.2(a)(3) is not met and CAM does not apply to the FLARE3.</td>
</tr>
<tr>
<td>AUX-03</td>
<td>Various</td>
<td>The Emergency Generator (012-01) is subject to the emission standards of 40 C.F.R. 63 Subpart JJJJ which are exempt from CAM per 40 C.F.R. § 64.2 (b) (1)(i)</td>
</tr>
</tbody>
</table>

**45CSR10 – To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.**

*Internal Combustion Engines (Em. Unit IDs: 001-01 through 001-07, 002-02, 006-01, 006-02, 007-01, 007-02)*

All limits and standards of 45CSR§10-3 apply to fuel burning units. None of the compressor engines (001-01 through 001-07, 006-01, 006-02), Auxiliary Generator (002-02) and fire pump engines (007-01, 007-02) are a “Fuel burning unit” as defined in 45CSR§10-2.8. Therefore, none of the engines are subject to 45CSR§10-3 limits or standards. Similarly, all limits and standards of 45CSR§10-4 apply to manufacturing process source operations. None of the engines are a “manufacturing process” “source operation” according to the definitions in 45CSR§§10-2.11 and 2.19. Therefore, none of the engines are subject to 45CSR§10-4 limits or standards. As a final point, internal combustion engines, including gas turbines and emergency generators, are not subject to 45CSR10 according to the Director’s verbal guidance.

Emission Unit IDs- BLR02, HTR01, RBR01, RBR02 are less than 10 MMBtu/hr, and are exempt from the requirements of 45CSR§10-3 and 45CSR§§10-6 through 8 in accordance with the exemption granted under 45CSR§10-10.1.
Condition 10.2.1.b. of Permit R13-2823. This underlying condition applies to the compressor engines 006-01 and 006-02, and the fire pump engines 007-01 and 007-02. The condition states, "For the purpose of determining compliance with the Regulated Pollutant Limitation for SO2, a person designated by a Responsible Official or Authorized Representative shall maintain records of the maximum sulfur content on a per-shipment basis for fuel oil, recycled or used oil or annual certification of the sulfur content from the supplier for pipeline quality natural gas." These engines are not subject to an SO2 emission limitation. Therefore, this underlying recordkeeping is unnecessary for Title V permitting purposes.

40 CFR 63 Subpart ZZZZ - Emission Unit ID:s 001-01 through 001-07 are spark ignited non-emergency, 2 stroke lean burn engines. They are existing stationary engines with a site rating of greater than 500HP located at a major source of HAPs (Lightburn Compressor Station). These Engines are not subject to any requirements for 40 CFR 63 Subpart ZZZZ, per 40 C.F.R § 63.6590(b)(3)(i).

40 CFR 60 Subpart JJJJ – The compressor engines (EN01 – EN07) and auxiliary generator (AUX02) are not subject to this subpart since they were manufactured before the applicability date.

40 CFR 60 Subpart OOOO – This subpart does not apply to the facility since the facility does not have gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after August 23, 2011. None of the newly installed tanks onsite meet the applicability requirements in 40 CFR§60.5365(e).

40 CFR 60 Subpart OOOOa – This subpart does not apply to the facility since the facility does not have gas wells, centrifugal compressors, reciprocating compressors, and/or pneumatic controllers constructed, modified, or reconstructed after September 18, 2015.

40 CFR 63 Subpart DDDDD – The reboilers (RBR01 and RBR02) at the Lightburn Compressor Station are not subject to this subpart since they are exempt by §63.7491(h).

40 CFR 63 Subpart JJJJJ – The Lightburn Compressor Station is a major source of HAP; therefore, this subpart does not apply. The Lightburn Extraction Plant does not have any boilers as defined in §63.11237.

Request for Variances or Alternatives
None

Insignificant Activities
None

Comment Period
Beginning Date: November 15, 2017
Ending Date: December 15, 2017
Point of Contact

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

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Division of Air Quality  
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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)

The Draft/Proposed Permit was issued under permit number R30-04100013-2017. Since US EPA’s proposed comment period ended on January 2, 2018 and the permit was not issued in 2017, the permit number has been changed to coincide with the year of issuance. The final issued permit was issued as R30-04100013-2018.