West Virginia Department of Environmental Protection Division of Air Quality





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

This Fact Sheet serves to address the changes specific to this Minor Modification and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 14, 2020.

Permit Number: **R30-05100142-2020 (MM03)** Application Received: **June 20, 2023** Plant Identification Number: **03-54-051-00142** Permittee: **Blue Racer Midstream, LLC** Facility Name: **Natrium Extraction and Fractionation Processing Plant (NPP)** Mailing Address: **5949 Sherry Lane, Suite 1700, Dallas, TX 75225**

Permit Action Number: MM03 Revised: July 8, 2024

Physical Location: UTM Coordinates: Directions: Proctor, Marshall County, West Virginia
512.1 km Easting • 4,400.8 km Northing • Zone 17
Facility is located North of New Martinsville, WV off State Route 2 at 14786 Energy Road, Proctor, WV 26055

Facility Description

The Natrium Extraction and Fractionation Processing Plant (SIC Code: 1321) is a natural gas processing plant with natural gas liquids (NGL) processing capability (utilizing seven (7) permitted cryogenic plants) located approximately four (4) miles northwest of Proctor, Marshall County, WV along the east bank of the Ohio River. The facility has the capability to both process large amounts of raw natural gas (by separating out the liquids, drying it, and removing impurities) and to fractionate NGLs into usable components. NGLs are generally defined to be the lighter liquid components entrained in the gas stream as opposed to "condensate" which is the heavier, pentane plus (C5+) fraction of higher boiling point components that are separated at the well-head under standard conditions. NGLs - both after separation from gas pipelined to the site, as well as NGLs sent to the site via pipeline, truck, railcar, or barge - are separated (or "fractionated") into their constituent organic compounds. The compounds ethane, propane, butane, i-butane, and natural gasoline are produced by the fractionation process.

Emissions Summary

The change in potential to emit (PTE) associated with this modification is as follows:

Pollutant	PTE change (TPY)
Volatile Organic Compounds (VOCs)	-53.69
Hazardous Air Pollutants (HAPs)	-0.19

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 235.46 TPY of CO, 211.71 TPY of NO_X, and 299.94 TPY of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Blue Racer Midstream, LLC 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Construction permit requirement.
	45CSR30	Operating permit requirement.

State Only: N/A

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

The active permits/consent orders affected by this modification are as follows:

Permit or	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit (<i>if any</i>)
R13-2896K	8/17/2023	

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 purpose of this modification is to implement physical changes to increase the nominal capacities of each Cryogenic Plant 1 through 4 to 285 million standard cubic feet (mmscf) per day; revise the limit of the combined throughput of the seven (7) Cryogenic Plants to 1,945 mmscf/day; revise the truck loading schedule for pressurized products to reflect 9,000 propane loading events per year and 314 loading events per year each for isobutane, n-butane, and natural gasoline; and to voluntarily extend the applicability of 40 CFR 60 Subpart OOOOa to the entire group within the process instead of only groups 4 through 7. The changes under this modification were approved under R13-2896K.

The modification required the following changes to the Title V Permit:

- Section 1.0
 - Table 1.2 was updated since R13-2896K supersedes and replaces R13-2896J.
- Sections 2.0 and 3.0
 - The Title V Boilerplate was updated for conditions 2.1.3, 2.11.4, 2.17, 2.22.1, 3.5.3, 3.5.4, 3.5.7, 3.5.8.a.1, and 3.5.8.a.2.
 - The maximum throughput of the 7 Cryogenic Plants was updated in condition 3.1.11.
- Section 13.0
 - The VOC emission limits of S008 were updated in Table 13.1.1.
- Section 15.0
 - At the permittee's request, FUG Areas 1, 2, and 3 are being held to the applicable requirements of 40 CFR 60 Subpart OOOOa.
 - As a result of this, conditions 15.1.1 15.1.4, 15.2.1 15.2.2, 15.4.1 15.4.4, and 15.5.1 -15.5.6 have been removed as 40 CFR 60 Subparts KKK and OOOO are no longer applicable requirements. The remaining conditions have been renumbered.
 - Condition 15.1.1 (formerly 15.1.5) was revised based on the changes in R13-2896K.
 - Condition 15.1.7 was removed because this condition was not included in R13-2896K.
 - Changes to 40 C.F.R. 60 Subpart OOOOa with the effective date of May 7, 2024 were included in conditions 15.4.4 (formerly 15.4.8) and 15.5.5 (formerly 15.5.11).

Non-Applicability Determinations

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

None.

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:	Not Applicable for minor modifications.
Ending Date:	N/A

Point of Contact

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

Nikki B. Moats West Virginia Department of Environmental Protection Division of Air Quality 601 57th Street SE Charleston, WV 25304 304/414-1282 Nikki.b.moats@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)

Not applicable.