

Fact Sheet



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 April 14, 2020.

Permit Number: **R30-05100142-2020**

Application Received: **December 16, 2021**

Plant Identification Number: **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: *MM02* Revised: *May 26, 2022*

Physical Location: Proctor, Marshall County, West Virginia
UTM Coordinates: 512.1 km Easting • 4,400.8 km Northing • Zone 17
Directions: 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.

This modification is to (1) increase the amount of waste gases sent to the Ground Flare (S004A) and (2) to route the vapors created during pigging operations from three existing inlet receivers back into the process instead of releasing them as was previously permitted. These changes were approved under R13-2896J.

Emissions Summary

This modification results in the following emission changes:

Pollutant	Change in Potential Emissions (+ or -), TPY
NO _x	+7.88
CO	+15.74
VOC	-20.16
PM _{2.5}	+0.25
PM ₁₀	+0.26
PM	+0.26
SO ₂	N/A
HAPs	-0.50

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 353.63 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 45CSR30	NSR permitting Operating permit requirement.
State Only:	None	

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 Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2896J	April 5, 2022	

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

Changes from R13-2896J have been incorporated in the Title V permit. These changes include the following:

- Emission Units Table 1.1 was updated to show that certain vapors from pigging operations will now be captured by the VRU and routed back into the process;
- The Ground Flare emission limits under Table 11.1.2(a) and 11.1.2(b) were updated;
- The Ground Flare heat input combustion limit under 11.1.3 was updated; and
- The pigging emission limits under 14.1.4 were updated and a requirement to capture certain pigging vapors in the VRU and route them back into the process was added as 14.1.6.

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: NA

Ending Date: NA

Point of Contact

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

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 41283
Beena.j.modi@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.