MEMO

COMMONWEALTH OF PENNSYLVANIA

Department of Environmental Protection Southwest Regional Office

TO:

Air Quality Case File OP-26-00413

FROM:

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Air Quality Engineer

Air Quality

THROUGH: Barbara Hatch, P.E.

Acting Regional Manager

Air Quality

DATE:

May 7, 2015

RE:

Title V Operating Permit Renewal Application OP-26-00413

Texas Eastern Transmission, L.P. Uniontown Compressor Station

North Union Township, Fayette County APS 817885 AUTH 985240 PF 258165

BACKGROUND

On July 11, 2013 the Department received a renewal Title V operating permit application from Texas Eastern Transmission, L.P. (TE) for the Uniontown Compressor Station (Uniontown). The facility is located about two miles northeast of Uniontown and just south of State Route 119 between North Gallatin Avenue Extension and Connellsville St. TE operates an interstate pipeline system for the transport, storage, and distribution of natural gas from the Gulf Coast region to the Mid-Atlantic and Northeastern U.S. markets. Uniontown operates as one of a series of compressor stations along the transmission network system to boost line pressure and maintain gas flow. Uniontown transmits gas downstream through one of four pipelines to the Delmont Compressor Station located in Westmoreland County. Operation of the equipment at Uniontown results in the emission of various air contaminants. As a result of the facility's potential to emit NOx, Uniontown is a major stationary source as defined in Title I, Part D of the Clean Air Act Amendments. As such, the facility is subject to the Title V permitting requirements adopted at 25 Pa. Code, Chapter 127, Subchapter G.

In the previous Title V Operating Permit the main sources of emissions at the facility included four 1100 bhp each Ingersoll-Rand (IR) model #KVG-103 compressor engines (Source #101) installed in 1959 and two Solar Mars Turbines, T1 (#102) installed in 1991 and T2 (#103) installed in 1992. However, the four IR engines have since been taken out of service sometime between June 2001 and January 2012 according to Department inspection reports. Additional individual emission sources at the facility include a 600 bhp Caterpillar model #3412 emergency generator (#104), a 440 bhp

Waukesha model #VGF18GL emergency generator (#106), and area fugitives and storage tank #2 (#105).

Plan Approval #PA-26-00413B was issued on February 19, 2014 for the upgrade of the two (2) Solar Mars turbines from 12,600 bhp to 13,330 bhp each and to equip the turbines with EmeraChem (or equivalent) oxidation catalysts. This plan approval also included the concurrent construction of two (2) 1.15 mmbtu/hr natural gas-fired fuel gas heaters. Plan Approval #PA-26-00413B expires on August 19, 2015 which means that this is an ideal time to issue the renewal Title V Operating Permit.

Uniontown's previous renewal Title V permit expired on February 19, 2014. The application was considered timely pursuant to Section B, Condition #004 of the Title V permit which requires a renewal application be submitted at least six months prior to permit expiration. Receipt of the renewal application was published in the <u>PA Bulletin</u> on July 27, 2013. The application was deemed administratively complete on August 20, 2013.

REGULATORY ANALYSIS

There are several recent federal regulatory requirements which could potentially apply to this facility, both National Emission Standards for Hazardous Air Pollutants (NESHAPs) and New Source Performance Standards (NSPS). These will be discussed below:

NSPS

NSPS require new, modified, or reconstructed sources to control emissions to the level achievable by the best demonstrated technology as specified in the applicable provisions. Any source subject to an NSPS is also subject to the general provisions of NSPS Subpart A except where expressly noted. There are several NSPS that need to be evaluated for applicability to Uniontown.

40 CFR Subpart LLL – NSPS For Onshore Natural Gas Processing SO2 Emissions applies to each sweetening unit (SU) and each SU followed by a sulfur recover unit at a natural gas processing plant. Uniontown does not meet the definition of a natural gas processing plant, nor does the station include a sweetening unit. Therefore the requirements of Subpart LLL do not apply.

40 CFR Subpart KKK - Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants applies to affected facilities in onshore natural gas processing plants. Kinter does not meet the definition of natural gas processing plant and thus these requirements are not applicable.

40 CFR Subpart GG – Standards of Performance for Stationary Gas Turbines no longer applies to the turbines at Uniontown. Per 40 CFR §60.330(a), the provisions of this subpart are applicable to all stationary gas turbines with a heat input at peak load equal to or greater than 10 mmbtu/hr based on the lower heating value (LHV) of the fuel fired. The turbines at this facility have

a LHV heat input rating of 111.04 mmbtu/hr at 60° F. However, the modification to the turbines discussed above causes the turbines to be subject to NSPS Subpart KKKK and not subject to Subpart GG per 40 CFR §60.4305(b).

40 CFR Subpart KKKK – Standards of Performance for Stationary Combustion Turbines now applies to the turbines at this facility. Per 40 CFR §60.4305, this subpart applies to stationary combustion turbines with a heat input at peak load equal to or greater than 10 mmbtu/hr ased upon the higher heating value (HHV) of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005.

The uprated turbines are considered "modified facilities" under both state and Federal regulations. As provided in Subpart A – General Provisions, "modification" is defined in 40 CFR 60.14(a) as "... any physical or operational change to an existing facility which results in an increase in the emission rate to the atmosphere of any pollutant to which a standard applies shall be considered a modification within the meaning of section 111 of the Act." Uprating the existing turbines resulted in an increase of the SO₂ emission rate on a lb/hr basis. Per 40 CFR §60.15, the uprated turbines were not considered reconstructed because the fixed capital cost of the new components was less than 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility.

Per 40 CFR §60.4325, turbines subject to Subpart KKKK are required to meet the emission limits for NOx specified in Table 1 to this subpart. Table 1 establishes a NOx emission limit of 42 ppm at 15% O₂ or 250 ng/J of useful output (2.0 lb/MWh) for modified or reconstructed turbines rated greater than 50 mmbtu/hr and less than or equal to 850 mmbtu/hr firing natural gas. Solar has guaranteed NOx emissions of 25 ppm at 15% O₂ during normal operation which is now an operating permit emission limitation.

Per 40 CFR §60.4330(a)(2) the facility is exempt from fuel sulfur monitoring required under 40 CFR §60.4330(a)(2) because TE has a current tariff sheet that specifies the maximum total sulfur content of its natural gas fuel is 10 grains per 100 scf or less.

40 CFR Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution does not apply to this facility. Per 40 CFR §60.5365, "You are subject to the applicable provisions of this subpart if you are the owner or operator of one or more of the onshore affected facilities listed in paragraphs (a) through (g) of this section for which you commence construction, modification or reconstruction after August 23, 2011."

Paragraph (a) applies to gas wells, which are not part of this facility. Paragraphs (b) through (d) apply to equipment (reciprocating/centrifugal compressors and pneumatic controllers) located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. Uniontown is part of the natural gas transmission and storage segment and therefore the equipment does not qualify as affected facilities. Paragraph (e) applies to storage vessels in the natural gas production, processing, and transmission and storage segments. However, no new storage vessels are proposed as part of this application. Paragraphs (f) and (g) apply to equipment

within a process unit and sweeting units located at onshore processing plants, but equipment at Uniontown does not meet the definition of process unit and is not a processing plant.

NESHAPs

NESHAPs are applicable to both major and area sources of hazardous air pollutants (HAPs). Part 63 NESHAPs apply to sources in specifically regulated industrial source categories (CAA Section 112(d)) or on a case-by-case basis (Section 112(g)) for facilities not regulated as a specific industrial source type.

- 40 CFR Part 63 Subpart HH Oil and Natural Gas Production Facilities does not apply to this facility. Per 40 CFR §63.760(a), "This subpart applies to the owners and operators of the emission points, specified in paragraph (b) of this section that are located at oil and natural gas production facilities that meet the specified criteria in paragraphs (a)(1) and either (a)(2) or (a)(3) of this section." Uniontown operates in the natural gas transmission and storage source category and is therefore not subject to 40 CFR Part 63 Subpart HH.
- 40 CFR Part 63 Subpart HHH Natural Gas Transmission and Storage Facilities does not apply to this facility. Per 40 CFR §63.1270(b), "The affected source is each new and existing glycol dehydration unit specified in paragraphs (b)(1) through (3) of this section." No glycol dehydration units are currently authorized or proposed at Uniontown.
- 40 CFR Part 63 Subpart YYYY Stationary Combustion Turbines does not apply to this facility. Per 40 CFR §63.6085 a person is subject to this subpart if they own or operate a stationary combustion turbine located at a major source of HAP emissions. Uniontown is not a major source of HAP emissions.
- 40 CFR Part 63 Subpart ZZZZ Stationary Reciprocating Internal Combustion Engines does apply to the emergency generator engines at this facility. Both engines fall into Category 5 of Table 2d, "Emergency stationary SI RICE" which requires the following maintenance:
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first.
 - b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first.
 - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

The engines are also subject to the monitoring and maintenance requirements of 40 CFR 63.6625, continuous compliance requirements of 40 CFR 63.6605 and 63.6640, and the recordkeeping requirements of 40 CFR 63.6655. The applicable sections of these requirements have been added to the Title V operating permit.

Additional Federal Requirements

40 CFR Part 64: Compliance Assurance Monitoring

The Compliance Assurance Monitoring (CAM) requirements of 40 CFR §§ 64.1-64.10 were promulgated by EPA in 1997 and intended to provide a reasonable assurance of compliance with applicable requirements under the Clean Air Act (CAA). In accordance with 40 CFR 64.2(a), CAM applies to each pollutant-specific emission unit (PSEU) that:

- Is located at a major source that is required to obtain a Title V permit,
- Is subject to an emission limitation,
- Uses a control device to meet that limit, and
- Has pre-controlled emissions greater than the major source threshold.

At the Uniontown Station, only carbon monoxide is applicable to this regulation as the precontrol, potential emissions from each uprated turbine is 112.7 tpy. An oxidation catalyst has been installed on each turbine to bring the controlled, potential CO emissions from each uprated turbine to 29.6 tpy. Texas Eastern proposes to meet the requirements of 40 CFR 64 via a Continuous Parametric Monitoring System (CPMS).

40 CFR Part 68 Chemical Accident Prevention Provisions: This part sets forth the list of regulated substances and thresholds and the requirements for owners or operators of stationary sources concerning the prevention of accidental releases. The substances and threshold quantity that are considered a regulated substance under this part are listed in Tables 1, 2, 3, and 4 to 40 § 68.130. TE does not store any of the listed compounds at the Uniontown Station; therefore the requirements of this subpart do not apply.

40 CFR Part 98 Mandatory Greenhouse Gas Reporting: This part was promulgated on October 30, 2009. In accordance with 40 CFR § 98.2(a), the Greenhouse Gas (GHG) reporting requirements and related monitoring, recordkeeping, and reporting requirements of this part apply to the owners and operators of any facility that is located in the United States and that meets the requirements of either paragraph 40 CFR § 98.2 (a)(1), (a)(2), or (a)(3) of this section.

However, public comments to the Greenhouse Gas Mandatory Reporting Rule (GHG MRR) questioned the requirements of this rule to meet current definitions of "applicable requirement" at 40 CFR §§ 70.2 and 71.2. The commentators requested that USEPA confirm their interpretation of the regulations. The EPA provided the following response: "As currently written, the definition of "applicable requirement" in 40 CFR §§ 70.2 and 71.2 does not include a monitoring rule such as today's action, which is promulgated under CAA sections 114(a)(1) and 208." The preamble of the final version of the GHG MRR, located at 74 Fed Reg 209, pp. 56287-56288, states that the GHG MRR is not considered an "applicable requirement" under the Title V Operating Permit program. Therefore, this Subpart, while it may be an obligation for this facility, is not considered an applicable condition for this Title V Operating Permit.

40 CFR Parts 51 and 52 Greenhouse Gas Tailoring Rule: This regulation was issued on May 13, 2010. This rule establishes a process for conducting Prevention of Significant Deterioration (PSD) reviews, including Best Available Control Technology (BACT) determinations for control of greenhouse gases (GHG) when a new source or a modification to an existing source results in emissions of GHGs in excess of certain thresholds. New industrial facilities that emit the equivalent of 100,000 tons of carbon dioxide per year and modified sources that increase their emissions by 75,000 tons annually are required to get PSD approvals for greenhouse gas emissions.

The applicability of the Greenhouse Gas Tailoring Rule was evaluated during the review of the Title V application. Plan Approval #PA-26-00413B was issued on February 19, 2014 for the upgrade of the two (2) Solar Mars turbines from 12,600 bhp to 13,330 bhp each and to equip the turbines with EmeraChem (or equivalent) oxidation catalysts. During the review of this Plan Approval application, a PSD applicability determination was conducted because the station's pre-project GHG PTE was greater than 100,000 tpy. The end result was that the project approved under Plan Approval #PA-26-00413B did not result in a significant increase of GHGs or any attainment pollutant and PSD did not apply. Please see the review memo for Plan Approval #PA-26-00413B for further information.

PA Requirements

Additional conditions included in this SOOP are from Title 25 of the PA Code as well as appropriate monitoring, recordkeeping and reporting requirements.

PERMIT CHANGES

There have been several changes made in this renewal operating permit from the time the previous Title V operating permit was originally issued on February 19, 2019. These are presented and discussed below:

1. On March 26, 2009 the Department determined that installation of a new electric compressor and space heater (RFD #26-00413C) were not exempt from plan approval requirements. Although the compressor had no emissions of its own, the capacity of the station to move transmit additional natural gas resulted in the potential to emit more fugitive VOC emissions from pipeline leaks in valves, flanges, etc. Therefore, a plan approval application was requested and Plan Approval #PA-26-00413A subsequently issued on March 1, 2010. The plan approval included the installation of a 20,000 bhp electric compressor, a 0.12 mmbtu/hr fuel gas heater, and an uprate of an existing electric compressor from 11,000 bhp to 14,300 bhp. PA-26-00413A also increased the facility-wide VOC limitation from 26 tpy to 49 tpy and established startup, shutdown, and low temperature definitions and emission limitations for the existing Solar turbines.

2. On January 29, 2010, the Department approved RFD #26-00413D for replacement of the gas producer, power turbine and gear box of the existing Solar Mars Turbine #1 (Source 102) with a like-kind components.

EMISSION INFORMATION

The largest sources of emissions at the Uniontown facility are the Solar Mars turbines now that the compressor engines have been shut down. Emissions from the turbines were calculated by the applicant based upon a combination of turbine manufacturer's emissions data and recommendations, oxidation catalyst control efficiencies, AP-42 Chapter 3.1 emission factors, and 40 CFR Part 98 Subchapter C emission factors. TE has accounted for emissions during startup, shutdown, and low temperature events in calculating PTE. Emissions were calculated based upon an elective combined fuel cap for the two turbines which is included as a plan approval condition. The proposed fuel cap is 1,666 MMscf/yr on a 12-month rolling basis (75% of the maximum fuel usage).

PTE calculations for NOx and CO were based on manufacturer provided emission factors. Based on the catalyst manufacturer's data, TE has accounted for a 95% reduction in CO except during startup since the oxidation catalyst can be expected to be ineffective during startup. Control during shutdown is expected since temperatures are still elevated.

Methane, ethane, and VOC emissions were calculated based on scaling of AP-42 Chapter 3.1 emission factors using Solar's unburned hydrocarbon emission rate. During normal and shutdown operations, TE has accounted for a 50% reduction in VOC and 83% reduction in total HAP emissions to account for control efficiency of the oxidation catalyst.

SO₂, PM₁₀, and PM_{2.5} emission factors have been based on AP-42 Chapter 3.1. Solar has not historically warranted particulate matter emissions. Although Solar recommends using their own PM emission factors TE has chosen to represent their PTE based on AP-42 factors. This methodology is conservative since the AP-42 emission factor is higher than Solar's recommended factor.

CO₂ and N₂O emission factors have been based upon emission factors from 40 CFR Part 98 Subpart C, tables C-1 and C-2, to represent CO₂e emissions. Solar does not provide source specific emission factors for greenhouse gas (GHG) pollutants. "Annual tpy" under "Normal 100% Load" in Table 1 below shows the emissions at 6,570 hours/year (effective 75% fuel usage limitation) based upon the annual average temperature while "Combined Annual Emission Rate" considers startup, shutdown, and cold weather events. The last column in Table 1, "Maximum Annual Emission Rate", is the larger value between these two columns and is considered the PTE for each pollutant.

Table 1: Solar Mars 100 Compressor Turbine PTE

		Normal 100% Loa	d	Combined Annual Emission Rate ^b	Maximum Annual Emission Rate (PTE)
Pollutant	ppmyd Max lb/hr ^c Annual tpy ^d		tpy	tpy	
	ppmvd	12.60	38.15	38.36	38.36
NOx	25		2.32	22.48	22.48
СО	2.50 ^e	0.77		1.82	1.82
VOC		0.48	1.45	0.13	0.13
Formaldehyde	•	0.016	0.05		0.38
HAP (Total)h	•	0.0797	0.24	0.38	
PM ₁₀	-	0.92	2.80	2.78	2.80
		0.92	2.80	2.78	2.80
PM _{2.5}		0.48	1.44	1.44	1.44
SOx	-			50,427	50,427
CO₂e		16,576	50,385		

^a PTE from each turbine.

Turbines are known to have higher emission rates for NO_x, CO, and unburned hydrocarbons during startup and shutdown. This reflects the unit not operating in SoLoNO_x mode during the majority of these transitional periods, and the effect is most substantial on the CO emission rate. Control of CO and unburned hydrocarbon emissions by the proposed oxidation catalyst is still expected during shutdown when temperatures are still elevated. PTE was calculated by the applicant using manufacturer provided emission factors at lower loads for startup and shutdown, and extrapolations of manufacturer provided emission factors at normal loads for low temperature operation. The applicant's worst case startup/shutdown frequency is 274 events per year with duration of approximately 9 minutes per event for startup and 8.5 minutes for shutdown. Low temperature operation has been defined to occur between -20° F and 0° F, and a total of 21 hours per year was estimated using long-term meteorological data for Pease Airforce Base located north of Boston, MA (consistent with other recent TE plan approval submittals for the SW region). After review of hourly climate data maintained by the National Weather Service for Pittsburgh, this estimate has been found acceptable. According to the hourly climate archive for Pittsburgh, zero hours of temperature less than 0° F have been recorded since 2010. These tpy emission rates have been added to the "Combined" column of Table 5 above to determine annual PTE for the Mars 100 turbine. Table 2 lists the startup, shutdown, and low temperature

^b Combined emission rates include worst case annual startup (41 hr/yr), shutdown (39 hr/yr), and low temperature estimates (21 hr/yr at -20°F < $T \le 0$ °F). These are not operational limits.

Short term emission rate (lb/hr) at worst case 0.1 ° F for "normal" operation by definition in this plan approval.

d Annual emissions rate (tpy) based upon manufacturer's short term (lb/hr) emission rate at annual average temperature of 43.76° F.

e Approximate rate based on vendor guaranteed CO rate of 25 ppmvd reduced 95% by the oxidation catalyst. This is not a plan approval limit.

Table 2: Solar Mars 100 Startup, Shutdown, and Low Temperature PTE (per turbine)

	Sta	rtup ^a	Shutdown ^b		Low Temperature ^c		
Pollutant	41 l	41 hrs/yr		39 hrs/yr		21 hrs/yr	
	(lb/hr) ^b	(tpy)	(lb/hr) ^b	(tpy)	(lb/hr)	(tpy)	
NO _x	2.88	0.20	3.32	0.23	21.79	0.23	
CO	279.53	19.13	15.14	1.04	31.59	0.33	
VOC	3.50	0.24	1.90	0.13	1.98	0.02	
HAP (Total)	1.71	0.12	0.31	0.02	0.97	0.01	
Formaldehyde	1.18	0.081	0.06	0.00	0.67	< 0.01	
PM ₁₀	0.09	0.006	0.10	0.01	0.95	0.01	
PM _{2.5}	0.09	0.006	0.10	0.01	0.95	0.01	
SO _x	0.05	0.003	0.05	0.00	0.49	<0.01	
CO₂e	1,906	130	2,557	175	17,133	180	

^a 274 events per year at 9 minutes per event. Calculations based upon: lbs of emissions per event multiplied by # of events per year.

Potential emissions from the two (2) proposed 1.15 MMBtu/hr natural gas-fired process heaters were calculated by the applicant based upon manufacturer-provided emission rates, and AP-42 Chapter 1.4 and 40 CFR Part 98 Subpart C emission factors, and 8,760 hours of operation per year. The two new heaters will be included in the Miscellaneous Section of the Title V permit as insignificant sources along with the existing heaters.

^b 274 events per year at 8.5 minutes per event. Calculations based upon: lbs of emissions per event multiplied by # of events per year.

^c Low Temperature is $-20^{\circ}F < T \le 0^{\circ}F$.

Table 3: Two (2) Natural Gas-Fired Process Heaters PTE^a

Dellutent	Emission Rate		
Pollutant	lb/hr	tpy	
NO _x	0.11	0.49	
СО	0.17	0.74	
VOC	0.03	0.15	
HAP (Total)	0.01	0.05	
Formaldehyde	-	•	
PM ₁₀	0.01	0.04	
PM _{2.5}	0.01	0.04	
SO _x	-		
CO₂e	136	597	

^a PTE from each heater

VOC and HAP sources at this facility include separators, storage tanks, truck loading, piping components, gas release events, and a parts washer which are all included in Source 105, Area Fugitives and Storage Tanks, of the Title V permit. PTE was calculated utilizing EPA TANKS 4.09d for standing and working losses, a flash gas analysis for flash losses, AP-42 Chapter 5.2 for loading losses, EPA 453/R-95-017 factors for component leaks, and mass balance techniques for gas release events and the parts washer. Truck loading is to be conducted with tanker trucks in dedicated normal service through submerged loading. Transmitted natural gas expected at the inlet to Uniontown is identified as "dry" meaning the amount of heavier (propane and above) hydrocarbons along with HAPs such as benzene, toluene, ethylbenzene, and xylene are minimal.

Table 4: Separators, Storage Tank, Truck Loading, Parts Washer PTE (tpy)

Sources	VOC	HAP	Benzene	Hexane	CO ₂ e
Separators (8)	0.50	0.03	0.01	0.01	23
Storage Tanks (5)	0.74	0.05	0.01	0.02	33
Flash Gas	0.84	0.05	0.01	0.04	18
Truck Loading (3)	0.02	0.00	0.00	0.00	0.7
Component Leaks	10.35	1.23	0.13	0.17	2,225
Gas Release Events	31.47	2.68	0.38	0.62	24,654
Parts Washer (1)	0.41	-	-	-	-
Total	44.32	4.04	0.55	0.87	26,952

Additional existing combustion sources at Uniontown include one (1) 600 bhp Caterpillar G3412 natural gas-fired auxiliary generator, one (1) 440 bhp Waukesha VGF18GL natural gas-fired

emergency generator (limited to 500 hours/yr), and heaters 302-HTR-01 through 12. PTE calculations were performed using regulatory limitations, manufacturer's data, and AP-42 and 40 CFR Part 98 emission factors.

Table 5: Miscellaneous Combustion Sources PTE (tpy)^a

Pollutant	CAT G3412 (30235)	Waukesha VGF18GL (30236)	Heaters (12) (302-HTR-01 thru 12)	Total
NO _x	2.89	0.49	0.54	3.92
СО	4.74	0.42	0.18	5.35
PM ₁₀	0.02	0.01	0.03	0.07
PM _{2.5}	0.02	0.01	0.03	0.07
SO _x	0.00	0.00	-	0.00
VOC	0.04	0.18	0.02	0.24
НСНО	0.03	0.08	-	0.11
HAP	0.04	0.11	-	0.15
CO₂e	156	151	544	851

^a Excludes the four compressor engines removed from service.

There are no additional sources at the site that are considered trivial or insignificant activities that have not already been discussed.

PA-26-00413A increased the facility-wide VOC limit from 26 tpy to 49 tpy. This facility-wide emission limit will be maintained in the Title V permit. Compliance with the VOC emission limit is accomplished by limiting VOC emissions from the Solar Mars 100 turbines (sources 30205 and 30206), standing and working losses (sources 302-V1 through 302-V7), truck loading losses (source 302-TL-PL), and gas release events (source 302-GR) to 37.28 tons/12-month period.

Table 6 lists the facility wide PTE for all emitted pollutants:

Table 6: Facility-Wide PTE

Pollutant	Emission Rate (tpy)
NOx	81.51
СО	51.79
PM ₁₀	5.75
PM _{2.5}	5.75
SOx	2.90
VOC	49.00
Formaldehyde	0.38
Benzene	0.57
Hexane	0.97
Toluene	0.72
Xylenes	0.73
НАР	5.06
CO₂e	129,851.00

CONCLUSIONS AND RECOMMENDATIONS

I have completed my review of TE's renewal Title V permit application for their Uniontown Station. TE has met the regulatory requirements associated with this application submittal. The attached proposed permit reflects terms and conditions as described in TE's permit application. It is my recommendation to issue a Title V permit for this facility.