

COMMONWEALTH OF PENNSYLVANIA
Department of Environmental Protection
Southwest Regional Office

MEMO

SUBJECT Comments and Response Document
Review of Title V Operating Permit Renewal Application
Equitrans, LP, Hartson Station
Finleyville Boro, Washington County
AUTH #944761 APS# 792332 PF# 250515

DATE June 30, 2014

TO Air Quality Permit File: TVOP-63-00642

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Equitrans, LP (Equitrans), a subsidiary of EQT Corporation, operates a network of facilities in southwestern PA used for the production, storage, and transmission of natural gas. The Hartson Station is a natural gas storage and transmission facility which consists of three Cooper-Bessemer GMV-10 reciprocating internal combustion engines (1,350 hp each), one natural gas-fired generator (367 hp) equipped with oxidation catalyst, a tri-ethylene glycol dehydration unit, and six miscellaneous small combustion units (rated at less than 1.5 mmbtu/hr each).

An initial TVOP was issued for this site on August 11, 1997. A renewal TVOP was issued on March 27, 2008. A second renewal TVOP renewal application was received on September 28, 2012 and determined to be administratively complete on November 19, 2012.

Plan Approval PA-63-00642A was issued on May 2, 2012 to authorize the installation of Cameron Compressor Systems CleanBurn Technology packages on the three existing engines, the uprate of the engines from 1,100 hp to 1,350 hp, and the establishment of federally enforceable natural minor emission limitations for the site. The requirements of this Plan Approval have been incorporated into this TVOP. Although this facility is no longer major, company has requested a TVOP be issued for the site.

In accordance with 25 Pa. Code §§ 127.424, 127.425 and 127.521, notice of our intent to publish this TVOP renewal was published in the PA Bulletin on May 10, 2014 and in the Observer-Reporter on May 22, 23 and 24, 2014, and copies of the Review Memo and the proposed TVOP renewal were sent to EPA on May 13, 2014. Comment period ended June 25, 2014. Group Against Smog & Pollution (GASP) conducted informal file reviews during the comment period.

Comments were received from GASP on June 9, 2014. DEP asked Equitrans to provide additional technical information regarding GASP's comments. Equitrans provided their comments and the additional technical information on June 19, 2014. GASP's and Equitrans' comments and our responses to them are included in **ATTACHMENT 1** to this memo.

Equitrans has complied with all the regulatory requirements associated with this authorization. I recommend that TVOP-63-00642 be renewed for another five-year term.

ATTACHMENT 1

GASP Comment #1: The facility's CO₂e emissions calculations must be revised to account for the updated Greenhouse Gas Reporting Rule GWPs for CH₄ and N₂O.

Response: Equitrans has provided updated GHG emission calculations, which may be seen in Table 1. The revised calculation method has resulted in an increase of calculated potential GHG emissions of less than 1%. In accordance with the Greenhouse Gas Tailoring Rules established at 40 CFR 51 and 52, 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. Hartson's GHG emissions are still well below the PSD thresholds. Therefore, a PSD application for greenhouse gas emissions was not required in 2012 for the installation of the CleanBurn packages on the Cooper Bessemer engines under PA-63-00642A due to these low levels of GHG emissions and still not be required under the revised GHG emission calculations.

GASP Comment #2: The facility's emission calculations for combustion units must be revised to account for the site-specific gas composition.

Response: Equitrans has evaluated the impact that the site-specific gas composition may have on emission calculations. Emission estimates for the Compressor Engines are based on gram/brake-horsepower limits and are independent of gas composition. The generator engine emissions are based on fuel consumption converted to heat input using high heating value (HHV). Therefore the HHV has been updated for the generator to reflect the site-specific value. For the miscellaneous combustion units included in Source 104, emissions are calculated using AP-42 Section 1.4 emission factors and the default HHV of 1,020 Btu/scf. This results in worst-case results. Equitrans currently uses site-specific HHV when calculating and reporting actual emissions from the facility, and will continue to do so.

GASP Comment #3 The Department should add permit conditions requiring Equitrans to regularly perform fractional gas analyses at the facility natural gas inlet and report the results to DEP.

Response: TVOP has been revised as requested.

GASP Comment #4 The Department should incorporate leak detection and repair requirements into the Hartson facility operating permit.

Response: In general, TVOPs do not have the authority to impose new requirements that do not already exist with few exceptions. The July 10, 1995 Memorandum titled "White Paper for Streamlined Development of Part 70 Permit Applications" issued by Lydia N. Wegman, Deputy Director, Office of Air Quality Planning and Standards addresses this issue directly: "Title V of the Clean Air Act (the Act) and its implementing regulations in part 70 set forth minimum requirements for State operating permit programs. In general, this program was not intended by Congress to be the source of new substantive requirements. Rather, operating permits required by title V are meant to accomplish the largely procedural task of identifying and recording existing substantive requirements applicable to regulated sources and to assure compliance with these existing requirements. Accordingly, operating permits and their accompanying applications should be vehicles for defining existing compliance obligations rather than for imposing new requirements or accomplishing other objectives." (*EPA White Paper for Streamlined Development of Part 70 Permit Applications*, Wegman, Lydia, July 10, 1995, p. 1).

Hartson is not currently subject to any State or Federal regulations requiring the implementation of a LDAR program. Where DEP has been requiring LDAR, it has been while approving new sources.

In accordance with 40 CFR 98, Subpart W—Petroleum and Natural Gas Systems, permittee is monitoring for fugitives. The preamble of the final version of the Greenhouse Gas Mandatory Reporting Rule (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.

Nevertheless, the TVOP renewal proposed on May 13, 2014 contained the following two new conditions:

“The Owner/Operator shall perform a weekly inspection for the presence of visible stack emissions, fugitive emissions, and malodorous emissions when the emission sources at this facility are operating. Records of the inspections shall be maintained in a log and include any corrective actions taken.”

“The permittee shall maintain records of all weekly inspections performed. These records shall include the date, time, name and title of the observer, incidents where the stack opacity, fugitive emission, or malodor from the respective sources violates any applicable standard, and any action taken as a result of these observations.”

Compliance with these conditions ensures compliance with the fugitive emission, malodor and visible emission requirements found at 25 Pa Code §§ 123.1-2, 123.31 and 123.41.

Equitrans Comment #1: For purposes of confirmation, Section C, Condition #009 and #012 are new requirements.

Response: As noted by Equitrans, the TVOP renewal proposed on May 13, 2014 contained the following two new conditions:

“The Owner/Operator shall perform a weekly inspection for the presence of visible stack emissions, fugitive emissions, and malodorous emissions when the emission sources at this facility are operating. Records of the inspections shall be maintained in a log and include any corrective actions taken.”

“The permittee shall maintain records of all weekly inspections performed. These records shall include the date, time, name and title of the observer, incidents where the stack opacity, fugitive emission, or malodor from the respective sources violates any applicable standard, and any action taken as a result of these observations.”

These conditions provide a method for demonstrating that Equitrans is in compliance with the fugitive emission, malodor and visible emission requirements found at 25 Pa Code §§ 123.1-2, 123.31 and 123.41.

Equitrans Comment #2: Section C, Item VIII, requires a submittal of Compliance Certification within 30 days of 3/1/1997. This date should be updated.

Response: This Condition has been removed from the renewal TVOP. An updated schedule for submittal of Compliance Certifications is found in Section C, Condition #019.

Equitrans Comment #3 Section E, Condition #001 does not apply to compressor engines since combustion units are exempt. Therefore, Equitrans requests that this condition be removed.

Response: In accordance with 25 Pa Code 121.1, a combustion unit is defined as “A stationary equipment used to burn fuel primarily for the purpose of producing power or heat by indirect heat transfer.” The engines do not burn fuel for the purpose of producing power or heat by indirect heat transfer. The term “combustion unit” is typically used for boilers. Therefore, 25 Pa Code 123.13 has not been removed from the TVOP.

Equitrans Comment #4 Equitrans requests that requirements from RACT OP-63-000-642 be added back into this TVOP renewal.

Response: Permit has been revised as requested. Group 02 RACT Affected Sources has been created, and all RACT requirements have been put into this group.

Equitrans Comment #5: Equitrans requests that a Compliance Schedule be added to the TVOP renewal. Compliance schedule would include milestones for revising the PA SIP to remove current RACT requirements for the Hartson Station.

Response: Permit has been revised as requested. The requested SIP Revision Compliance Schedule has been added to Group 02 RACT Affected Sources.

TABLE 1

Potential Emissions																
Process	Source ID	NOx			CO			VOC			Formaldehyde	THAPs	SO2	PM	CO2e	
		g/bhp	lb/hr	tpy	g/bhp	lb/hr	tpy	g/bhp	lb/hr	tpy						lb/hr
Eng #1	101	2.0	5.95	26.07	2.0	5.95	26.07	0.7	2.08	9.13	0.496	2.172	3.41	0.03	2.43	5,885
Eng #2	102	2.0	5.95	26.07	2.0	5.95	26.07	0.7	2.08	9.13	0.496	2.172	3.41	0.03	2.43	5,885
Eng #3	103	2.0	5.95	26.07	2.0	5.95	26.07	0.7	2.08	9.13	0.496	2.172	3.41	0.03	2.43	5,885
Generator	105A	-	0.79	3.47	-	0.04	0.18	-	0.34	1.49	0.06	0.275	0.43	0.01	0.26	1,570
Misc Combustion	104	-	0.37	1.63	-	0.31	1.37	-	0.02	0.09	0.0012	0.001	0.03	0.01	0.12	1,952
Misc Fugitive VOCs	107	-	-	-	-	-	-	-	0.213	0.95	-	-	0.007	-	-	832
TOTAL		-	19.02	83.32	-	18.21	79.77	-	6.83	29.92	1.55	6.79	10.7	0.11	7.67	22,011

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