

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Region: Winston-Salem Regional Office
County: Rockingham
NC Facility ID: 7900131
Inspector's Name: Eric Hudson
Date of Last Inspection: 12/16/2009
Compliance Code: 3 / Compliance - inspection

Permit Issue Date:

Facility Data			Permit Applicability (this application only)	
Applicant (Facility's Name): Transcontinental Gas Pipe Line Company, LLC - Station 160 Facility Address: Transcontinental Gas Pipe Line Company, LLC - Station 160 4300 NC 65 Reidsville, NC 27320 SIC: 4922 / Natural Gas Transmission NAICS: 48621 / Pipeline Transportation of Natural Gas Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: 15A NCAC 2D .1109 (Case-By-Case MACT) PSD: PSD Avoidance: NC Toxics: 112(r): Other:	
Contact Data			Application Data	
Facility Contact	Authorized Contact	Technical Contact	Application Number: 7900131.09B Date Received: 09/08/2009 Application Type: 112(j) Part II Application Schedule: TV-Significant Existing Permit Data Existing Permit Number: 09113/T08 Existing Permit Issue Date: 03/26/2009 Existing Permit Expiration Date: 10/31/2011	
Walter Romine District Manager (336) 951-2251 4300 NC Highway 65 Reidsville, NC 27320+9336	Mark Bisett Manager, Environmental Compliance (713) 215-2000 PO Box 1396 Houston, TX 77251+1396	Cecilia Chapa Engineer II (713) 215-2964 PO Box 1396 Houston, TX 77251+1396		
Review Engineer: Fern Paterson Review Engineer's Signature: _____ Date: _____			Comments / Recommendations: Issue: 09113/T09 Permit Issue Date: _____ Permit Expiration Date: 10/31/2011	

I. Purpose of Application

Transcontinental Gas Pipe Line Company, LLC - Station 160 is located in Reidsville, Rockingham County, North Carolina. Application No. 7900131.09B, received September 8, 2009, is a Part 2 MACT "Hammer" application for one natural gas fired boiler (**ID No. ES-BLR2**) rated at 5.2 million British thermal units per hour (MMBtu/hr).

II. Permit Modifications/Changes

The following table describes the modifications to the current permit.

Page(s)	Section	Description of Change(s)
Insignificant Activity List	Attachment	Remove affected boilers (ID Nos. I-ES-BLR2) from the insignificant activity list.
1	Permit Cover Page	Amend permit revision numbers and issuance/effective dates.
3	Section 1, Table	Add affected boilers (ID Nos. ES-BLR2) to the list of permitted sources and include a "Case-By-Case MACT" designation.
8-9	2.1.E. (New)	Add Section to include applicable requirements for the affected boiler (ID Nos. ES-

Page(s)	Section	Description of Change(s)
		BLR2).
13-22	Section 3	Update General Provisions with the most recent revision (v. 3.3)

III. Regulatory Review

1. **15A NCAC 2D .0503 – Particulates from Fuel Burning Indirect Heat Exchangers** – This regulation limits particulate matter (PM) emissions from the firing of fuel in indirect heat exchangers (in lb/mmBtu) based on the facility-wide heat input. For facilities with a total heat input of up to 10 MMBth/hr, PM emissions from the combustion sources are limited to not greater than 0.60 lb/MMBtu. Using AP-42 emission factors, PM emissions from natural gas are estimated to be less than 0.60 lb/MMBtu, as follows:

$$\frac{\left(7.6 \frac{lbPM_{total}}{mmscf} \right)}{1,020 \frac{MMBtu}{mmscf}} = 0.007 \frac{lbPM_{total}}{mmBtu}$$

Because worst-case PM emission rates are estimated to be less than the allowable PM emission rate, no monitoring, recordkeeping, or reporting shall be required to demonstrate compliance with this limitation.

2. **15A NCAC 2D .0516– Sulfur Dioxide Emissions From Combustion Sources** – This regulation limits sulfur dioxide (SO₂) emissions to no greater than 2.3 lb/mmBtu of heat input for combustion sources. Using AP-42 emission factors, SO₂ emissions from natural gas are estimated to be less than 2.3 lb/MMBtu, as follows:

$$\frac{\left(0.6 \frac{lbSO_2}{mmscf} \right)}{1,020 \frac{MMBtu}{mmscf}} = 0.0006 \frac{lbSO_2}{mmBtu}$$

Because worst-case SO₂ emission rates are estimated to be less than the allowable SO₂ emission rate, no monitoring, recordkeeping, or reporting shall be required to demonstrate compliance with this limitation.

3. **15A NCAC 2D .0521 – Control of Visible Emissions** – Visible emission (VE) standards provided in this regulation are applicable to potential VE emissions from any stack, vent, or outlet. This regulation limits visible emissions to no more than 20 percent opacity when averaged over a 6-minute period, except that 6-minute periods averaging more than 87 percent opacity may occur not more than once in any hour not more than four times in any 24-hour period. Because natural gas firing is associated with inherently low visible emissions, no monitoring, recordkeeping, or reporting shall be required to demonstrate compliance with this limitation.
4. **15A NCAC 2D .1109 –Case-by-Case MACT** – On July 20, 2007, the D.C. Circuit Court vacated the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, which had been promulgated under 40 CFR 63, Subpart DDDDD. The North Carolina Attorney General’s office has determined that the NESHAP vacatur equates to the failure of the U.S. EPA to promulgate a standard as required under Section 112(d) of the Clean Air Act (CAA). As a result, the site-specific Maximum Achievable Control Technology (MACT) standards required under CAA §112(j), commonly referred to as the MACT “hammer” provisions, have been triggered. North Carolina regulations implementing the MACT hammer are found at 15A NCAC 2D .1109.

On September 8, 2009, the NC DAQ received a Part 2 MACT “Hammer” application from this facility for one affected natural gas-fired boiler (**ID No. ES-BLR2**). No control technologies for the control of CO, metals, Hg, or HCl were identified for natural gas fired boilers in the state of North Carolina, nor were any such technologies identified in a North Carolina query using U.S. EPA’s AirControlNet software (v4.1). The NC DAQ has determined that MACT is the use of best work practice standards for natural gas combustion sources, consistent with the provisions in CAA § 112(d)(2)(D). Best work practice standards in this case shall include the annual inspection and maintenance of the boiler as follows:

To assure compliance, the Permittee shall perform an annual boiler inspection and maintenance as recommended by the manufacturer, or as a minimum, the inspection and maintenance requirement shall include the following:

- i. Inspect the burner, and clean or replace any components of the burner as necessary;*
- ii. Inspect the flame pattern and make any adjustments to the burner necessary to optimize the flame pattern; and,*
- iii. Inspect the system controlling the air-to-fuel ratio, and ensure that it is correctly calibrated and functioning properly.*

The Permittee shall conduct at least one tune-up per calendar year to demonstrate compliance with this requirement. The Permittee shall be deemed in noncompliance with 15A NCAC 2D .1109 if the affected boilers are not inspected and maintained as required above.

In addition, the Permittee will be required to record the results of the annual inspection in a logbook (written or electronic format), which shall be retained on-site and made available to an authorized representative upon request.

IV. Draft Permit Review Summary

Eric Hudson of the Winston-Salem Regional Office was provided a draft permit and draft permit review document on December 15, 2010. <SUMMARY OF COMMENTS>.

Cecilia Chapa of Williams was provided a draft permit for review on December 15, 2010. <SUMMARY OF COMMENTS>.

Ms. Katy Forney and Ms. Gracy DeNois (U.S. EPA, Region IV) were provided a draft permit for review on <DATE>. <SUMMARY OF COMMENTS>.

V. Recommendations

This permit modification application for Transcontinental Gas Pipe Line Company, LLC - Station 160 located in Reidsville, Rockingham County, North Carolina has been reviewed by NC DAQ to determine compliance with all procedures and requirements. NC DAQ has determined that this facility appears to be complying with all applicable requirements.

Issue Permit No. 09113T09