

## STATEMENT OF BASIS for LINDEN COMPRESSOR STATION

### TITLE V OPERATING PERMIT RENEWAL WITH SIGNIFICANT MODIFICATION

Program Interest (PI): 41722 / Permit Activity Number: BOP180001

#### I. FACILITY INFORMATION

Linden Compressor Station is located at Lower Road and Range Road, Linden, Union County, NJ 07036 and consists of three RICE engines, one emergency generator, pipeline liquids storage vessels, and an above ground storage tank. The facility is owned by Texas Eastern Transmission LP and is operated by Linden Compressor Station.

The facility is classified as a major facility based on its potential to emit 148.88 tons per year NO<sub>x</sub>, 213.96 tons per year CO, and 89.18 tons per year volatile organic compounds.

It is also classified as a major hazardous air pollutant (HAP) facility. A HAP emitting facility is designated as major when the allowed emissions exceed 10 tons per year of any individual hazardous air pollutant or 25 tons per year of any combination of individual hazardous air pollutants that may be emitted simultaneously.

This permit allows individual hazardous air pollutant to be emitted at a rate to not exceed: 9,780 pounds per year of Acetaldehyde, 984 pounds per year of Acrolein, 2,460 pounds per year of Benzene, 1,038 pounds per year of Butadiene (1,3), 25.6 pounds per year of Carbon Tetrachloride, 19.8 pounds per year of Chloroform, 18.46 pounds per year of Dichloropropene (1,3), 45.6 pounds per year of Ethylbenzene, 92 pounds per year of Ethylene dibromide, 69,600 pounds per year of Formaldehyde, 40.6 pounds per year of Naphthalene, 56.4 pounds per year of PAH, 28 pounds per year of Tetrachloroethane (1,1,2,2), 22.2 pounds per year of Trichloroethane (1,1,2) and 10.4 pounds per year of Vinyl chloride.

#### II. AREA ATTAINMENT CLASSIFICATION

The Federal Clean Air Act (CAA) sets National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These commonly found air pollutants (also known as "criteria pollutants") are particulate matter, ground-level ozone, carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), and lead. The US Environmental Protection Agency (USEPA) also classifies areas as "attainment" or "nonattainment" for each criteria pollutant, based on the magnitude of an area's problem. Nonattainment classifications are used to specify what air pollution reduction measures an area must adopt, and when the area must reach attainment. Currently, the entire State of New Jersey is designated as nonattainment for the 8-hour ozone NAAQS. New Jersey is designated attainment for all other pollutants. For nonattainment classification refer to <https://www.epa.gov/green-book/green-book-national-area-and-county-level-multi-pollutant-information>.

#### III. BACKGROUND AND HISTORY

The equipment that emits air contaminants from this facility include: three 2,153-bhp Clark HBA-8T 2-stroke, lean-burn, reciprocating engines, 20.3 MMBtu/hr each and one 9.95 MMBtu/hr emergency generator, pipeline liquids storage vessels, and an above ground storage tank.

A Facility-Wide Risk Assessment was conducted during the Operating Permit Renewal process. Health Risk Assessment included changes made to Air Toxics (including HAPs) emissions.

The Renewal Permit with Significant Modification includes the following changes:

Update emission estimates for piping components, gas releases, and existing insignificant sources. These updates are being made to reconcile permitted emissions with the current methodology used by Enbridge (Texas Eastern's parent company) to estimate potential emissions for permitting purposes.

Table 1 - Operating Permit Revision History (located at the end of this document) provides a summary of all the changes that have been incorporated into the operating permit through seven-day notice changes, administrative amendments, minor modifications, or significant modifications since the approval of the initial operating permit or the most recent renewal thereof. Please refer to the attached explanation sheet for the structure and configuration of conditions of approval, included in the Facility Specific Requirements section of this permit.

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In addition, Texas Eastern evaluated potential HAP emissions against the new reporting thresholds in N.J.A.C. 7:27-17. As a result, this modification requests that the following HAPs be added to the permit for the reciprocating engines in U1, U2 and U3: Carbon tetrachloride, Chloroform, 1,3-dichloropropene Ethylbenzene, Naphthalene, PAH, 1,1,2,2-tetrachloroethane, 1,1,2-trichloroethane, and Vinyl chloride.

Texas Eastern also requested an administrative revision to the facility responsible official as listed in the Facility Profile (General) section of the application.

This renewal with significant modification will also change the allowable emission limits as listed in the following table:

Allowable Emission Limits	Facility's Potential Emissions (tons per year)*									
	VOC (total)	NO <sub>x</sub>	CO	SO <sub>2</sub>	TSP (total)	PM <sub>10</sub> (total)	PM <sub>2.5</sub> (total)	Pb	HAPs (total)	CO <sub>2e</sub> (total)
Current Permit	80.14	148.88	213.96	0.001	12.31	12.31	NA	NA	42.07	52,947.51
Proposed Permit	89.18	148.88	213.96	NA	12.31	12.31	12.31	NA	42.07	58,823
Change (+ / -)	+9.04	0.0	0.0	0.0	0.0	0.0	12.31	NA	+0.0	+5,875.49

VOC Volatile Organic Compounds

NO<sub>x</sub> Nitrogen Oxides

CO Carbon Monoxide

SO<sub>2</sub> Sulfur Dioxide

TSP Total Suspended Particulates

\* Other Any other air contaminant regulated under the Federal Clean Air Act.

PM<sub>10</sub>

PM<sub>2.5</sub>

Pb

HAPs

CO<sub>2e</sub>

Particulates under 10 microns

Particulates under 2.5 microns

Lead

Hazardous Air Pollutants

Carbon Dioxide equivalent

#### IV. CASE-BY-CASE DETERMINATIONS

No case-by-case determinations were required for this modification.

#### V. EMISSION OFFSET REQUIREMENTS

This modification is not subject to Emission Offset requirements.

#### VI. BASIS FOR MONITORING AND RECORDKEEPING REQUIREMENTS

The facility's operating permit includes monitoring, recordkeeping and reporting requirements that are sufficient to demonstrate the facility's continued compliance with the applicable requirements consistent with the following:

- Provisions to implement the testing and monitoring requirements of N.J.A.C. 7:27-22.18, the recordkeeping and reporting requirements of N.J.A.C. 7:27-22.19, and all emissions monitoring and analysis procedures or compliance assurance methods required under the applicable requirements, including any procedures and methods promulgated pursuant to 40 CFR 64; and
- Where the applicable requirement does not require direct periodic monitoring of emissions, the Department requires periodic monitoring of surrogate parameters sufficient to yield reliable data from the relevant time period that are representative of the facility's compliance with the permit.

For U1, U2 and U3: fuel flow monitoring by fuel flow monitoring instruments.

- In some cases, direct periodic monitoring of emissions and/or surrogate parameters is not required due to one or more of the following:
  - Equipment size and capacity limitations,
  - Subject equipment being permitted at the maximum rated capacity,

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- There is no specific state or Federal standard that applies to this piece of equipment,
- Not a pollutant of concern for this piece of equipment,
- Agreements with EPA on the frequency of testing and monitoring for combustion sources.

#### VII. APPLICABLE STATE AND FEDERAL RULES

This modification is subject to New Jersey Air Pollution Control Regulations, codified in N.J.A.C. 7:27-1 through 34, as applicable. A complete text of these regulations is available at:

<http://www.nj.gov/dep/aqm/rules27.html>

This modification is also subject to Federal regulations listed below.

MACT Subpart A: General Provisions

MACT Subpart ZZZZ: National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines at major HAPS sources.

The Greenhouse Gas (GHG) emissions from this facility are 58,823 TPY CO<sub>2</sub>e and the GHG emissions increase are 5,875.49 TPY CO<sub>2</sub>e. This modification is not subject to PSD rules at 40 CFR 52.21.

#### VIII. FACILITY'S COMPLIANCE STATUS

The Responsible Official at the facility has certified that the facility currently meets all applicable requirements of the Federal Clean Air Act and the New Jersey Air Pollution Control Act. Based on this certification, the Department's evaluation of the information included in the facility's application, and a review of the facility's compliance status, the Department has concluded that this air pollution control operating permit should be approved.

The facility has submitted a timely and complete application to renew their operating permit and an application shield is in effect.

This operating permit includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. A permit shield provides that compliance with the relevant conditions of the operating permit shall be deemed compliance with the specific applicable requirements that are in effect on the date of issuance of the draft operating permit, and which form the basis for the conditions in the operating permit.

Also, prior to the expiration of the five-year period, the facility will be required to apply for a renewal of this operating permit, at which time the Department will evaluate the facility and issue a public notice with its findings.

#### IX. EXEMPT ACTIVITIES

The facility's operating permit does not include exempt activities such as office and interior maintenance activities, maintenance shop activities, food preparation facilities, cafeterias and dining rooms, etc. A complete list of exempt activities, as allowed by the Operating Permit rule, can be found at N.J.A.C. 7:27-22.1.

New Jersey Department of Environmental Protection

Operating Permit Revision History

LINDEN COMPRESSOR STATION      PI 41722

Permit Activity Number	Type of Revision	Description of Revision	Final Action Date
BOP220001	Administrative Amendment	Administrative amendment to change the Responsible Official and General Contact for the Station.	1/25/2022
BOP210001	Administrative Amendment	Administrative amendment to change the Responsible Official.	12/17/2021
BOP190002	Administrative Amendment	Enbridge is the operator of Texas Eastern Transmission Corporation and is changing it's responsible official from Thomas V Wooden to Kerry Puckett effective July 1 2019. There was no ownership change, only an update to the email address listed under operator and owner.	7/11/2019

FACILITY NAME (FACILITY ID NUMBER)  
BOP050001

Activity Number assigned  
by the Department

## New Jersey Department of Environmental Protection Facility Specific Requirements

Emission Unit Number  
assigned by the Facility

Brief description of  
emission unit

**Emission Unit:** U40 Sewage Sludge Incinerators  
**Operating Scenario:** OS Summary

OR

**OS2 Fluidized Bed Incinerator**

OS Summary lists all rules and requirements that apply to an emission unit. An emission unit may contain one or more pieces of equipment and corresponding operating scenarios.

OSX denotes the operating scenario number and lists the rules and requirements that apply to a scenario. An operating scenario represents various ways (or scenarios) a piece of equipment is permitted to operate.

Item  
Number

Description of applicable  
requirement

Monitoring method to  
ensure compliance

Recordkeeping to show  
facility's compliance

Actions and submittals  
required for the facility

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
3	The permittee shall conduct an annual performance test for each pollutant in Table 2 of 40CFR62 Subpart LLL between 11 and 13 calendar months after the previous performance test or within 60 days of a process change. [40 CFR 62.16000(a)]	Other: Conduct the performance test using the test methods, averaging methods and minimum sampling volumes or durations as specified in 40CFR62 Subpart LLL and according to the testing, monitoring and calibration requirements specified in 40 CFR 62.16015(a). [40 CFR 62.16000(a)].	Other: (1) Maintain records of the results of initial, annual and any subsequent performance tests conducted to determine compliance with the emission limits and standards and/or to establish operating limits, as applicable. [40 CFR 62.16025(e)].	Submit a report: Annually to the Administrator and to the Department. The permittee shall submit an annual compliance report as specified in 40 CFR 62. [40 CFR 62.16000(d)]

Rule citation for  
applicable requirement

Rule citation for  
monitoring requirement

Rule citation for  
recordkeeping requirement

Rule citation for submittal/  
action requirement

## Explanation Sheet for Facility Specific Requirements