

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

DEC 20 2012

Mr. Scott Schingen
Vice President - NGL Fractionation and Storage
ONEOK Hydrocarbon, L.P.
100 West 5th Street
Tulsa, OK 74103

RE: Application Completeness Determination for ONEOK Hydrocarbon, L.P.
Greenhouse Gas Prevention of Significant Deterioration Permit
Mont Belvieu NGL Fractionation Plant

Dear Mr. Schingen:

The EPA has reviewed your Prevention of Significant Deterioration (PSD) permit application for ONEOK Hydrocarbon, Mont Belvieu NGL Fractionation Plant that was received by the EPA on September 21, 2012, including supporting documentation, and determined that your application is incomplete at this time. A list of the information needed from you so that the EPA can continue its completeness review is enclosed (see Enclosure). Please notify us if a complete response is not possible by January 18, 2013.

The requested information is necessary for EPA to develop a Statement of Basis and Rationale for the terms and conditions for the requisite permit. As we develop our preliminary determination, it may be necessary for EPA to request additional clarifying or supporting information. If the supporting information substantially changes the original scope of the permit application, an amendment or new application may be required.

The EPA may not issue a final permit without determining that: 1) there will be no effects on threatened or endangered species or their designated critical habitat, or 2) until it has completed consultation under Section 7(a)(2) of the Endangered Species Act (16 USC § 1536). In addition, the EPA must undergo consultation pursuant to Section 106 of the National Historic Preservation Act (NHPA) (16 USC § 470f). As a reminder, NHPA implementing regulations require that EPA provide information to the public with an opportunity for participation in the Section 106 process. 36 CFR § 800.2(d). We look forward to receiving the Biological Assessment and Cultural Resources Reports that you have agreed to prepare for EPA for our use in complying with these statutes.

If you have any questions concerning the review of your application, please contact Aimee Wilson of my staff at (214) 665-7596.

Sincerely yours,



David F. Garcia
Acting Director
Multimedia Planning and
Permitting Division

ENCLOSURE
EPA Completeness Comments
ONEOK Hydrocarbon, L.P.
Application for Greenhouse Gas Prevention of Significant Deterioration Permit
Mont Belvieu NGL Fractionation Plant

1. Being mindful of EPA's PSD and Title V Permitting Guidance for GHG dated March, 2011 on page 17 which states the following:

“The CAA and corresponding implementing regulations require that a permitting authority conduct a BACT analysis on a case-by-case basis, and the permitting authority must evaluate the amount of emissions reductions that each available emissions-reducing technology or technique would achieve, as well as the energy, environmental, economic and other costs associated with each technology or technique. Based on this assessment, the permitting authority must establish a numeric emissions limitation that reflects the maximum degree of reduction achievable for each pollutant subject to BACT through the application of the selected technology or technique. However, if the permitting authority determines that technical or economic limitations on the application of a measurement methodology would make a numerical emissions standard infeasible for one or more pollutants, it may establish design, equipment, work practices or operational standards to satisfy the BACT requirement.”

In addition to the proposed tons per year emission limit provided in the permit application, please propose an output based or efficiency based limit for the hot oil heaters (e.g., lb or ton CO₂/barrel processed or Heat Required (MMBtu)). Please provide an analysis that substantiates any reasons for infeasibility of a numerical emission limitation. If a numerical emission limitation is infeasible, please propose an operating work practice standard that can be practically enforceable.