

Clearbrook Terminal capped air emission permit

Enbridge Line 3 replacement project

On September 14, 2018, Enbridge Energy applied for a capped air emission permit for the Clearbrook Terminal located at 17816 470th St. in Clearbrook, Minnesota. This type of permit restricts emissions to below federal permitting thresholds and requires the facility to comply with all applicable requirements.

Currently, the Clearbrook Terminal has an Option A registration permit that was issued in 1995. As a result of the Line 3 replacement project, the Clearbrook Terminal will no longer qualify for the registration permit and has applied for a capped permit.

Clearbrook Terminal

The Clearbrook Terminal is a crude oil pipeline and storage facility that includes:

- Nine storage tanks
- Five back-up emergency generators
- Two emergency fire pumps

The emissions are primarily volatile organic compound (VOC) emissions from the tanks and piping components, and combustion emission from the generators and pumps. The facility emissions alone were not enough to trigger the need for an air permit; however, one was required because some of the tanks are subject to federal New Source Performance Standards.

Capped permit requirements

The project is adding new pipeline components and a new pumping station with four electric pumps. It will not add any new tanks or engines. In addition, the current de-rated capacity of 390,000 barrels per day (bpd) will be restored to the original capacity of 760,000 bpd. As a result of these changes, the facility will no longer qualify for the Option A registration permit because potential VOC emissions of the facility would increase above 100 tons per year.

The capped permit rules require that estimated actual emissions before permit issuance and actual emissions after permit issuance remain below specific emission thresholds. The thresholds depend on whether the applicant is applying for a capped permit option 1 or option 2. Enbridge has applied for a capped permit option 2, which limits actual emission to the following:

- HAP, 8.0 tons per year for a single HAP, 20.0 tons per year total for all HAP's
- PM, 75.0 tons per year
- PM-10, 75.0 tons per year
- VOC, 85.0 tons per year
- SO₂, 90.0 tons per year
- NO_x, 85.0 tons per year
- CO, 85.0 tons per year
- Pb, 0.50 tons per year
- CO_{2e}, 85,000 tons per year

Public comment

The Clearbrook Terminal capped air permit is open for public comment from March 2 to April 3, 2020. Written comments are due by 4:00 p.m. on the comment period end date. During the comment period, an interested person may submit written comments via email or mail.

Instructions for submitting comments by email are at www.pca.state.mn.us/air/capped-air-emission-state-permit. Submit written comments by mail to

Minnesota Pollution Control Agency
Enbridge Line 3 Public Comments – Air Quality
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

For more information

Additional information on capped air emission permits can be found on the MPCA website www.pca.state.mn.us/air/capped-air-emission-state-permit. Additional information on the capped air emission permit for the Enbridge line 3 replacement project, including the capped permit application, can be found at <https://www.pca.state.mn.us/regulations/air-quality-permit-enbridge-line-3>.

The conditions for eligibility and compliance requirements for a capped state permit can be found in Minn. R. 7007.1140 to 7007.1148.