

Williams Ohio Valley Midstream LLC 100 Teletech Drive, Suite 2 Moundsville, WV 26041 (304) 843-4559 (304) 843-3196 fax

April 4, 2017

Beverly McKeone New Source Review Program Manager Division of Air Quality West Virginia Department of Environmental Protection 601 57th Street SE Charleston, WV 25304-2345

Subject:

Application for Class I Administrative Permit Update

Williams Ohio Valley Midstream LLC

Multiple Facilities

Marshall and Wetzel Counties, West Virginia

Dear Ms. McKeone:

Williams Ohio Valley Midstream LLC (OVM) is requesting Class I Administrative Permit Updates for facilities located in Marshall and Wetzel Counties, West Virginia. OVM operates glycol dehydration units at the sites listed below and the current permit applications recognize only one glycol pump associated with each dehydrator. The purpose of the updates is to allow each dehydrator the flexibility to be equipped with a maximum of two glycol pumps with the stipulation that only one pump will operate at a time. If a second pump is connected to the process, it will only serve as a backup pump.

Site	Permit	County
Bardall	R13-3090A	Marshall
Bryan	R13-3087	Marshall
Carmichael	R13-3086	Marshall
Caveney	R13-3085A	Marshall
Crow	R13-3152	Marshall
Doman	R13-3122	Marshall
Goshorn (20MM)	R13-3113A	Marshall
Grenadier (65MM)	R13-3276	Wetzel
Groves	R13-3212	Marshall

Beverly McKeone WVDEP – Division of Air Quality April 4, 2017 Page 2 of 2

Site	Permit	County
Hazlett	R13-3209A	Marshall
Hunter-Pethel	R13-3078	Marshall
Keaton	R13-3231	Marshall
Lucey	R13-3079	Marshall
Martinez (5MM)	R13-3112	Marshall
McClain	R13-3264	Marshall
Neehouse	R13-3262	Marshall
Siburt	R13-3096	Marshall
Sivert	R13-3165A	Marshall
Snyder	R13-3210A	Marshall
Starcovic	R13-3250	Marshall
Stout	R13-3246	Marshall
Whipkey	R13-3072	Marshall
Witzgal	R13-3263	Marshall
Woodruff	R13-3161	Marshall
Zien	R13-3074A	Marshall

If you have any questions regarding this submittal or need additional information, please contact me at (304) 843-4559 or erika.baldauff@williams.com.

Sincerely,

Erika Baldauff

Environmental Specialist

Enclosures:

Applications for Class I Administrative Permit Update

Martinez Station Application for 45CSR13 Class I Administrative Permit Update

Williams Ohio Valley Midstream, LLC - Martinez Station 45CSR13 Class I Administrative Permit Update

The triethylene glycol (TEG) dehydrator at the facility is currently equipped with one Kimray 4020 PV glycol pump with maximum glycol circulation rate of 40 gallons per hour. The purpose of the Class I Administrative Permit Update is to authorize the TEG dehydrator to be equipped with up to two identical Kimray 4020 PV glycol pumps but only one pump will be operated at a time. There are no changes proposed to the glycol dehydrator operation and therefore no change in emissions.

As stated in the West Virginia air quality rules under §45-13-4. Administrative Updates to Existing Permits and General Permit Registrations, Section 4.2.a:

4.2.a. Class I administrative updates are limited to the following:

4.2.a.5. Change in a permit condition to incorporate any new more stringent requirements related to new information not considered at the time the existing permit was issued

The Martinez Station is not a major source and Williams Ohio Valley Midstream, LLC is seeking new requirements that allow the dehydrator to be equipped with up to two glycol pumps and a limitation that only one pump may operate at a time. The change in requirements are considered to be equivalent or superior to the existing permit requirements as the current permit does not contain any requirements or limitations on the glycol pump.

NEST VILLA

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

601 57th Street, SE Charleston, WV 25304 (304) 926-0475 www.dep.wv.gov/dag

APPLICATION FOR NSR PERMIT AND TITLE V PERMIT REVISION (OPTIONAL)

San Seure	(304) 92 <u>www.dep.w</u>		(OPTIO	NAL)
PLEASE CHECK ALL	THAT APPLY TO NSF	R (45CSR13) (IF KNOWN):	PLEASE CHECK TYPE OF 45CSR	30 (TITLE V) REVISION (IF ANY):
☐ CONSTRUCTION	☐ MODIFICATION	RELOCATION	☐ ADMINISTRATIVE AMENDMENT	☐ MINOR MODIFICATION
CLASS I ADMINIS	TRATIVE UPDATE	☐ TEMPORARY	☐ SIGNIFICANT MODIFICATION	☑ NOT APPLICABLE
CLASS II ADMINIS	TRATIVE UPDATE	AFTER-THE-FACT	IF ANY BOX ABOVE IS CHECKED, INFORMATION AS ATTACHMENT S	
FOR TITLE V FA	ACILITIES ONLY: Plea Title V Permit Revisio	se refer to "Title V Revision In Flowchart") and ability t	on Guidance" in order to determine yo o operate with the changes requested	our Title V Revision options I in this Permit Application.

	Section	l. General			
1.	Name of applicant (as registered with the WV Secretary of State's Office): WILLIAMS OHIO VALLEY MIDSTREAM LLC (OVM)		2. Federal Employer ID No. (FEIN): 27-0856707		
3.	Name of facility (if different from above): MARTINEZ DEHYDRATION STATION		4. The applicant is the: ☐ OWNER ☐ OPERATOR ☒ BOTH		
5A.	100 TELETECH DRIVE, SUITE 2 MOUNDSVILLE, WV 26041 0.3 MILE I 4.3 MILE I		resent physical address: I-NW OF WV-891 I-NE OF CAMERON LL COUNTY, WV 26033		
6.	West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? ☐ YES ☑ NO — If YES, provide a copy of the Certificate of Incorporation/Organization/Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A. — If NO, provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change amendments or other Business Certificate as Attachment A.				
7.	If applicant is a subsidiary corporation, please provide the name of parent corporation: THE WILLIAMS COMPANIES, INC.				
8.	Does the applicant own, lease, have an option to buy, or otherwise have control of the <i>proposed site?</i> YES NO — If YES, please explain: APPLICANT LEASES THE PROPERTY — If NO, you are not eligible for a permit for this source.				
9.	Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): 1389 - OIL AND GAS FIELD SERVICES, N.E.C.		North American Industry Classification System (NAICS) code for the facility: 213112 - SUPPORT ACTIVITIES FOR OIL AND GAS OPERATIONS		
11A.	DAQ Plant ID No. (existing facilities): 051-00171	11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (existing facilities): PERMIT R13-3112 DATED 12-02-2013			
12A.	Directions to the facility:				
	 For Modifications, Administrative Updates or Temporary permits at an existing facility, please provide directions to the present location of the facility from the nearest state road; For Construction or Relocation permits, please provide directions to the proposed new site location from the nearest state road. Include a MAP as Attachment B. DIRECTIONS FROM MAIN ST IN CAMERON: GO NORTH ON US-250/WAYNESBURG PIKE ~3.7 MI; TURN RIGHT ONTO WV-891 ~2.1 MI; TURN LEFT ONTO ACESS DRIVEWAY ~0.3 MI TO SITE. 				
All of	f the required forms and additional information can be found un	der the Permitting	Section of DAQ's website, or requested by phone.		

Williams Ohio Valley Midstream LLC

12.B.	New site address (if applicable):	12C.	Nearest city or town: CAMERON	12D.	County: MARSHALL
12.E.	UTM Northing (KM):	12F.	UTM Easting (KM):	12G.	UTM Zone:
	4,414.8 km N		540.7 km E		17
13.	OPERATED AT ANY TIME. THER SPECIFIED IN THE MOST RECEN	BUBMI BE EQ RE ARE IT PER	•	HE GL	YCOL PUMP/FLOW RATE AGE IS: TWO GLYCOL
14A.	Provide the date of anticipated installation or ISSUANCE	chang	e: IMMEDIATELY UPON PERMIT	14B.	Date of anticipated Start-Up if a permit is granted:
	 If this is an After-The-Fact permit applicate proposed change did happen: NA 	tion, pr	ovide the date upon which the		NA
14C.	Provide a Schedule of the planned Installation of/ Change to and Start-Up of each of the units proposed in this permit application as Attachment C (if more than one unit is involved).				
15.	Provide maximum projected Operating Schedule of activity/activities outlined in this application: Hours Per Day: 24 Days Per Week: 7 Weeks Per Year: 52				
16.	Is demolition or physical renovation at an existing facility involved? ☐ YES ☐ NO				
17.	Risk Management Plans. If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see www.epa.gov/ceppo), submit your Risk Management Plan (RMP) to U.S. EPA Region III.				
18.	Regulatory Discussion. List all Federal a proposed process <i>(if known)</i> . A list of possi (Title V Permit Revision Information). Discusthis information as Attachment D .	ble ap	olicable requirements is also include	ed in A	ttachment S of this application
	Section II. Additiona	l atta	chments and supporting	docu	ıments.
	Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13).				
20.	Include a Table of Contents as the first page of your application package.				
	Provide a Plot Plan , e.g. scaled map(s) and/or sketch(es) showing the location of the property on which the stationary source(s) is or is to be located as Attachment E (Refer to Plot Plan Guidance).				
	 Indicate the location of the nearest occupie 	ed stru	cture (e.g. church, school, business,	reside	nce).
	Provide a Detailed Process Flow Diagram(s) showing each proposed or modified emissions unit, emission point and control device as Attachment F .				
23.	Provide a Process Description as Attachm	ent G.			
	 Also describe and quantify to the extent po 	ssible	all changes made to the facility sinc	e the la	st permit review (if applicable).
24.	Provide Material Safety Data Sheets (MSD	S) for a	Ill materials processed, used or proc	uced a	s Attachment H.
	 For chemical processes, provide a MSDS 	for eac	ch compound emitted to the air.		
25.	Fill out the Emission Units Table and provide	le it as	Attachment I.		
26.	Fill out the Emission Points Data Summary Sheet (Table 1 and Table 2) and provide it as Attachment J.				
27.	Fill out the Fugitive Emissions Data Summ	ary Sh	eet and provide it as Attachment K		

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

28.	Check all applicable Emissions Unit Data Sho Bulk Liquid Transfer (TLO/8E) Chemical Processes Concrete Batch Plant Grey Iron and Steel Foundry General Emission Unit, specify:	eets listed below: Haul Road Emissions Hot Mix Asphalt Plant Incinerator Indirect Heat Exchanger	☐ Quarry☐ Solid Materials Sizing, Handling and Storage Facilities☐ Storage Tanks			
	Fill out and provide the Emissions Unit Data S	heet(s) as Attachment L.				
29.	Check all applicable Air Pollution Control D	evice Sheets listed below:				
	☐ Absorption Systems	☐ Baghouse	☐ Flare			
	☐ Adsorption Systems	☐ Condenser	☐ Mechanical Collector			
	Afterburner	☐ Electrostatic Precipitator	☐ Wet Collecting System			
	Other Collectors, specify:					
	Fill out and provide the Air Pollution Control De	evice Sheet(s) as Attachment M .				
30.	Provide all Supporting Emissions Calculations as Attachment N, or attach the calculations directly to the forms listed in Items 28 through 31.					
31.	Monitoring, Recordkeeping, Reporting and Testing Plans. Attach proposed monitoring, recordkeeping, reporting and testing plans in order to demonstrate compliance with the proposed emissions limits and operating parameters in this permit application. Provide this information as Attachment O .					
>	Please be aware that all permits must be practically enforceable whether or not the applicant chooses to propose such measures. Additionally, the DAQ may not be able to accept all measures proposed by the applicant. If none of these plans are proposed by the applicant, DAQ will develop such plans and include them in the permit.					
32.	Public Notice. At the time that the application is submitted, place a Class I Legal Advertisement in a newspaper of general circulation in the area where the source is or will be located (See 45CSR§13-8.3 through 45CSR§13-8.5 and <i>Example Legal Advertisement</i> for details). Please submit the Affidavit of Publication as Attachment P immediately upon receipt.					
33.	Business Confidentiality Claims. Does this	application include confidential information	ation (per 45CSR31)?			
	☐ YES	⊠ NO				
>	If YES, identify each segment of information on each page that is submitted as confidential and provide justification for each segment claimed confidential, including the criteria under 45CSR§31-4.1, and in accordance with the DAQ's "Precautionary Notice – Claims of Confidentiality" guidance found in the General Instructions as Attachment Q.					
	Section III. Certification of Information					
34.	Authority/Delegation of Authority. Only req Check applicable Authority Form below:	uired when someone other than the re	esponsible official signs the application.			
	☐ Authority of Corporation or Other Business	Entity	nership			
	☐ Authority of Governmental Agency	☐ Authority of Limite	ed Partnership			
	Submit completed and signed Authority Fo	rm as Attachment R.				
All of	the required forms and additional information car	All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.				

35A. Certification of Information. To certify this permit application, a Responsible Official (45CSR§13-2.22 and 45CSR§30-2.28 or Authorized Representative shall check the appropriate box and sign below.			
Certification of Truth, Accuracy, and Completeness			
I, the undersigned Responsible Official / Authorized Representative, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.			
Compliance Certification			
Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.			
SIGNATURE: (Please use blue ink)	DATE: April 4, 2017 (Please use blue ink)		
35B. Printed name of signee: PAUL HUNTER	35C. Title: GENERAL MANAGER, OHIO RIVER SUPPLY HUB		
35D. E-mail: PAULV.HUNTER@WILLIAMS.COM	36E. Phone: 36F. FAX: (412) 787-5561 (412) 787-6002		
36A. Printed name of contact person: ERIKA BALDAUFF	36B. Title: ENVIRONMENTAL SPECIALIST		
36C. E-mail:	36D. Phone: 36E. FAX:		
ERIKA.BALDAUFF@WILLIAMS.COM	(304) 843-4559 (304) 843-3131		
DI FACE CUECU ALL ARRIVOARI E ATTACUMENTO INCLUDER M	WILLIAM DEDMIT ADDITIONAL		
PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED W			
☐ Attachment A: Business Certificate	Attachment K: Fugitive Emissions Data Summary Sheet		
☐ Attachment B: Map(s)☐ Attachment C: Installation and Start Up Schedule	☐ Attachment L: Emissions Unit Data Sheet(s) ☐ Attachment M: Air Pollution Control Device Sheet(s)		
☐ Attachment D: Regulatory Discussion	Attachment N: Supporting Emissions Calculations		
☐ Attachment E: Plot Plan	Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans		
☐ Attachment F: Detailed Process Flow Diagram(s)	Attachment P: Public Notice		
Attachment G: Process Description	Attachment Q: Business Confidential Claims) (NA)		
☐ Attachment H: Material Safety Data Sheets (MSDS)	Attachment R: Authority Forms) (NA)		
☐ Attachment I: Emission Units Table	Attachment S: Title V Permit Revision Information) (NA)		
☐ Attachment J: Emission Points Data Summary Sheet	Application Fee		
Please mail an original and three (3) copies of the complete permit application with the signature(s) to the DAQ, Permitting Section, at the address listed on the first page of this application. Please DO NOT fax permit applications.			
FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE:	에 가장 있는 것이 하면 하는 것이 되었다. 이 경우 하는 것이 되었다. 그 사람들은 사람들은 물건을 보면 하는 것이 하는 것이 되었다. 그런 것이 되었다.		
Forward 1 copy of the application to the Title V Permitting 6	Group and		
☐ For Title V Administrative Amendments:			
□ NSR permit writer should notify Title V permit writer of draft permit			
☐ For Title V Minor Modifications: ☐ Title V permit writer should send appropriate notification to EBA and affected states within 5 days of receipt			
☐ Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt, ☐ NSR permit writer should notify Title V permit writer of draft permit			
☐ NSR permit writer should notify Title V permit writer of draft permit. ☐ For Title V Significant Modifications processed in parallel with NSR Permit revision:			
☐ NSR permit writer should notify a Title V permit writer of draft permit,			
☐ Public notice should reference both 45CSR13 and Title V permits,			
	☐ EPA has 45 day review period of a draft permit.		

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.