

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

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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

# Carmichael Station Application for 45CSR13 Class I Administrative Permit Update

The triethylene glycol (TEG) dehydrator at the facility is currently equipped with one Kimray 9020PV glycol pump with maximum glycol circulation rate of 90 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 9020 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:

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

The Carmichael 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.

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF AIR QUALITY 601 57 <sup>th</sup> Street, SE Charleston, WV 25304 (304) 926-0475 www.dep.wv.gov/daq	TI	LICATION FOR NSR PERMIT AND TLE V PERMIT REVISION (OPTIONAL)		
PLEASE CHECK ALL THAT APPLY TO NSR (45CSR13) (IF KNOWN): CONSTRUCTION MODIFICATION RELOCATION CLASS I ADMINISTRATIVE UPDATE TEMPORARY CLASS II ADMINISTRATIVE UPDATE AFTER-THE-FACT	PLEASE CHECK TYPE OF 45CSR30 (TITLE V) REVISION (IF ANY):         ADMINISTRATIVE AMENDMENT       MINOR MODIFICATION         SIGNIFICANT MODIFICATION       NOT APPLICABLE         IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION         INFORMATION AS ATTACHMENT S TO THIS APPLICATION			
FOR TITLE V FACILITIES ONLY: Please refer to "Title V Revis (Appendix A, "Title V Permit Revision Flowchart") and ability				
Section	I. General			
1. Name of applicant (as registered with the WV Secretary of WILLIAMS OHIO VALLEY MIDSTREAM LLC (OVM)	f State's Office):	2. Federal Employer ID No. ( <i>FEIN</i> ): 27-0856707		
3. Name of facility <i>(if different from above):</i> CARMICHAEL COMPRESSOR STATION	4. The applicant is the: ☐ OWNER ☐ OPERATOR ⊠ BOT			
5A. Applicant's mailing address: 100 TELETECH DRIVE, SUITE 2 MOUNDSVILLE, WV 26041	5B. Facility's present physical address: OFF STATE ROUTE 250 APPROX. 8 MILES ESE OF MOUNDSVILLE, WV			
<ul> <li>6. West Virginia Business Registration. Is the applicant a resident of the State of West Virginia? YES NO</li> <li>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.</li> <li>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.</li> </ul>				
7. If applicant is a subsidiary corporation, please provide the	name of parent cor	poration: THE WILLIAMS COMPANIES, INC.		
<ul> <li>B. Does the applicant own, lease, have an option to buy, or otherwise have control of the <i>proposed site</i>? X YES NO</li> <li>If YES, please explain: APPLICANT LEASES THE PROPERTY</li> </ul>				
<ul> <li>If NO, you are not eligible for a permit for this source.</li> </ul>				
<ol> <li>Type of plant or facility (stationary source) to be construct relocated, administratively updated or temporarily perp preparation plant, primary crusher, etc.):</li> </ol>		10. North American Industry Classification System <b>(NAICS)</b> code for the facility:		
1389 - OIL AND GAS FIELD SERVICES, N.E.C.		213112 - SUPPORT ACTIVITIES FOR OIL AND GAS OPERATIONS		
11A. DAQ Plant ID No. (existing facilities): 051-00168	numbers as	ent 45CSR13 and 45CSR30 (Title V) permit esociated with this process (existing facilities):		
	PERMIT R <sup>2</sup>	3-3086A DATED 03-17-2014		
12A. Directions to the facility:		with the ility places provide directions to the		
<ul> <li>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;</li> </ul>				
<ul> <li>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.</li> <li>FROM MOUNDSVILLE, HEAD NORTH ON JEFFERSON AVE. TOWARD 3RD STREET FOR 0.3 MILES, TURN RIGHT ONTO 1ST STREET IN 0.8 MILES, TURN LEFT ONTO US-250 S/WAYNESBURG PIKE AND TRAVEL 12.0 MILES, TURN LEFT AND TRAVEL 0.3 MILES ON UNKNOWN ROAD TO FACILITY.</li> </ul>				
All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.				
Williams Ohio Valley Midstream LLC				

12.B.	B. New site address (if applicable): 12C. Nearest city or town: 12L na MOUNDSVILLE		12D. County: MARSHALL	
12.E.	UTM Northing (KM): 4,415.700	12F. UTM Easting (KM): 536.142	12G. UTM Zone: 17	
13.				
14A.	<ul> <li>Provide the date of anticipated installation or change: IMMEDIATELY UPON PERMIT ISSUANCE</li> <li>If this is an After-The-Fact permit application, provide the date upon which the proposed change did happen: NA</li> </ul>			
14C.	Provide a <b>Schedule</b> of the planned <b>Installa</b> application as <b>Attachment C</b> (if more than c		the units proposed in this permit	
15.	Provide maximum projected <b>Operating Sch</b> Hours Per Day: <b>24</b> Days Per Wee		oplication:	
16.	Is demolition or physical renovation at an ex	isting 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.	<b>Regulatory Discussion.</b> List all Federal and State air pollution control regulations that you believe are applicable to the proposed process <i>(if known)</i> . A list of possible applicable requirements is also included in <b>Attachment S</b> of this application (Title V Permit Revision Information). Discuss applicability and proposed demonstration(s) of compliance <i>(if known)</i> . Provide this information as <b>Attachment D</b> .			
	Section II. Additiona	al attachments and supporting	documents.	
19.	Include a check payable to WVDEP – Division of Air Quality with the appropriate <b>application fee</b> (per 45CSR22 and 45CSR13).			
20.	Include a Table of Contents as the first pag	e of your application package.		
21.	Provide a <b>Plot Plan,</b> 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 <b>Attachment E</b> (Refer to <b>Plot Plan Guidance</b> ).			
	<ul> <li>Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).</li> </ul>			
22.	Provide a <b>Detailed Process Flow Diagram(s)</b> showing each proposed or modified emissions unit, emission point and control device as <b>Attachment F.</b>			
23.	Provide a Process Description as Attachn	nent G.		
	- Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).			
24.	Provide Material Safety Data Sheets (MSDS) for all materials processed, used or produced as Attachment H.			
	<ul> <li>For chemical processes, provide a MSDS for each compound emitted to the air.</li> </ul>			
25.	Fill out the Emission Units Table and provide it as Attachment I.			
26.	Fill out the Emission Points Data Summar			
27.				
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 Sheets listed below:			
	Bulk Liquid Transfer (TLO/8E)	🗌 Haul Road Emi	ssions	Quarry
	Chemical Processes	Hot Mix Asphal	t Plant	Solid Materials Sizing, Handling
	Concrete Batch Plant	Incinerator		and Storage Facilities
	Grey Iron and Steel Foundry	Indirect Heat E	xchanger	Storage Tanks
	General Emission Unit, specify:			
	Fill out and provide the Emissions Unit Data	Sheet(s) as <b>Attachm</b>	ent L.	
29.	Check all applicable Air Pollution Control	Device Sheets liste	d below:	
	Absorption Systems	Baghouse		Flare
	Adsorption Systems	Condenser		Mechanical Collector
	Afterburner	Electrostatic Pr	ecipitator	Wet Collecting System
	Other Collectors, specify:			
	Fill out and provide the Air Pollution Control D	evice Sheet(s) as Af	tachment 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.	<b>Monitoring, Recordkeeping, Reporting and Testing Plans.</b> 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 <b>Attachment O</b> .			
>	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.	<b>Public Notice.</b> 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 <b>Attachment P</b> immediately upon receipt.			
33.	Business Confidentiality Claims. Does this application include confidential information (per 45CSR31)?			
>	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 I	II. Certificatior	n of Informati	on
34.	Authority/Delegation of Authority. Only reaches the constraint of	quired when someon	e other than the re	sponsible official signs the application.
	Authority of Corporation or Other Business	s Entity	Authority of Partn	ership
	Authority of Governmental Agency		Authority of Limite	ed Partnership

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

Certification of Information. To certify this permit application, a Responsible Official (45CSR§13-2.22 and 45CSR§30-2.28) 35A. 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:	35C.	Title:		
	PAUL HUNTER		GENERAL MANAGER, OF	HO RIV	/ER SUPPLY HUB
35D.	E-mail:	36E.	Phone:	36F.	FAX:
	PAULV.HUNTER@WILLIAMS.COM		(412) 787-5561		(412) 787-6002
36A.	Printed name of contact person:	36B.	Title:		
	ERIKA BALDAUFF		ENVIRONMENTAL SPECI	ALIST	
36C.	E-mail:	36D.	Phone:	36E.	FAX:
	ERIKA.BALDAUFF@WILLIAMS.COM		(304) 843-4559		(304) 843-3131

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:			
Attachment A: Business Certificate	Attachment K: Fugitive Emissions Data Summary Sheet		
Attachment B: Map(s)	Attachment L: Emissions Unit Data Sheet(s)		
Attachment C: Installation and Start Up Schedule	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:

Forward 1 copy of the application to the Title V Permitting 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 EPA and affected states within 5 days of receipt,

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.