



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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WVDEP – Division of Air Quality  
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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](mailto:erika.baldauff@williams.com).

Sincerely,



Erika Baldauff  
Environmental Specialist

Enclosures:

Applications for Class I Administrative Permit Update

**Keaton Station**

**Application for 45CSR13 Class I Administrative Permit Update**

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

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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 Keaton 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](http://www.dep.wv.gov/daq)

**APPLICATION FOR NSR PERMIT  
 AND  
 TITLE 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 Revision Guidance" in order to determine your Title V Revision options (Appendix A, "Title V Permit Revision Flowchart") and ability to operate with the changes requested in this Permit Application.

**Section I. General**

1. Name of applicant (as registered with the WV Secretary of State's Office): <b>WILLIAMS OHIO VALLEY MIDSTREAM LLC (OVM)</b>		2. Federal Employer ID No. (FEIN): <b>27-0856707</b>	
3. Name of facility (if different from above): <b>KEATON DEHYDRATION STATION</b>		4. The applicant is the: <input type="checkbox"/> OWNER <input type="checkbox"/> OPERATOR <input checked="" type="checkbox"/> BOTH	
5A. Applicant's mailing address: <b>100 TELETECH DRIVE, SUITE 2 MOUNDSVILLE, WV 26041</b>		5B. Facility's present physical address: <b>WEST OF ADAMS HILL RD (CO HWY 250/4) (~2.2 MILES N-NW OF CAMERON)</b>	
6. <b>West Virginia Business Registration.</b> Is the applicant a resident of the State of West Virginia? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO – If YES, provide a copy of the <b>Certificate of Incorporation/Organization/Limited Partnership</b> (one page) including any name change amendments or other Business Registration Certificate as <b>Attachment A</b> . – If NO, provide a copy of the <b>Certificate of Authority/Authority of L.L.C./Registration</b> (one page) including any name change amendments or other Business Certificate as <b>Attachment A</b> .			
7. If applicant is a subsidiary corporation, please provide the name of parent corporation: <b>THE WILLIAMS COMPANIES, INC.</b>			
8. Does the applicant own, lease, have an option to buy, or otherwise have control of the <i>proposed site</i> ? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO – If YES, please explain: <b>APPLICANT LEASES THE PROPERTY</b> – If NO, you are not eligible for a permit for this source.			
9. Type of plant or facility (stationary source) to be <b>constructed, modified, relocated, administratively updated</b> or <b>temporarily permitted</b> (e.g., coal preparation plant, primary crusher, etc.): <b>1389 - OIL AND GAS FIELD SERVICES, N.E.C.</b>		10. North American Industry Classification System (NAICS) code for the facility: <b>213112 - SUPPORT ACTIVITIES FOR OIL AND GAS OPERATIONS</b>	
11A. DAQ Plant ID No. (existing facilities): <b>051-00211</b>		11B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (existing facilities): <b>PERMIT R13-3231 DATED 06-23-2015</b>	
12A. Directions to the facility: – For <b>Modifications, Administrative Updates</b> or <b>Temporary permits</b> at an existing facility, please provide directions to the <i>present location</i> of the facility from the nearest state road; – For <b>Construction</b> or <b>Relocation permits</b> , please provide directions to the <i>proposed new site location</i> from the nearest state road. Include a <b>MAP</b> as <b>Attachment B</b> . <b>FROM MAIN ST IN CAMERON:</b> 1) HEAD NORTH ON US 250/WAYNESBORO PIKE ~ 1.8 MI; 2) TURN LEFT ONTO CLOUSTON WOODS/GRAVE CREEK RD ~ 1.2 MI; 3) SLIGHT RIGHT ONTO ADAMS HILL RD/CO RD 250/4 ~0.5 MI; 4) SLIGHT LEFT ONTO GRAVEL ACCESS ROAD ~ 0.2 MI.			

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

12.B. New site address (if applicable): <b>0.5 MILE S-SE OF 576 GOSHORN RIDGE RD</b>	12C. Nearest city or town: <b>CAMERON</b>	12D. County: <b>MARSHALL</b>
12.E. UTM Northing (KM): <b>4,412.00 KM NORTHING</b>	12F. UTM Easting (KM): <b>535.96 KM EASTING</b>	12G. UTM Zone: <b>17S</b>
13. Briefly describe the proposed change(s) at the facility: <b>THIS APPLICATION IS PREPARED AND SUBMITTED TO:</b> <ul style="list-style-type: none"> <li><b>SHOW THE DEHYDRATOR CAN BE EQUIPPED WITH TWO GLYCOL PUMPS AND ONLY ONE PUMP WILL BE OPERATED AT ANY TIME. THERE ARE NO PROPOSED CHANGES TO THE GLYCOL PUMP/FLOW RATE SPECIFIED IN THE MOST RECENT PERMIT APPLICATION. SUGGESTED VERBAGE IS: TWO GLYCOL PUMPS CAN BE CONNECTED TO THE PROCESS; HOWEVER, ONLY ONE GLYCOL PUMP IS PERMITTED TO RUN AT A TIME.</b></li> </ul>		
14A. Provide the date of anticipated installation or change: <b>IMMEDIATELY UPON PERMIT ISSUANCE</b> – If this is an <b>After-The-Fact</b> permit application, provide the date upon which the proposed change did happen: <b>NA</b>	14B. Date of anticipated Start-Up if a permit is granted: <b>NA</b>	
14C. Provide a <b>Schedule</b> of the planned <b>Installation of/Change</b> to and <b>Start-Up</b> of each of the units proposed in this permit application as <b>Attachment C</b> (if more than one unit is involved).		
15. Provide maximum projected <b>Operating Schedule</b> of activity/activities outlined in this application: Hours Per Day: <b>24</b> Days Per Week: <b>7</b> Weeks Per Year: <b>52</b>		
16. Is demolition or physical renovation at an existing facility involved? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		
17. <b>Risk Management Plans.</b> If this facility is subject to 112(r) of the 1990 CAAA, or will become subject due to proposed changes (for applicability help see <a href="http://www.epa.gov/ceppo">www.epa.gov/ceppo</a> ), submit your <b>Risk Management Plan (RMP)</b> 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. Additional 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 <b>Table of Contents</b> as the first page 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> ). – Indicate the location of the nearest occupied structure (e.g. church, school, business, residence).
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 <b>Process Description</b> as <b>Attachment G</b> . – Also describe and quantify to the extent possible all changes made to the facility since the last permit review (if applicable).
24. Provide <b>Material Safety Data Sheets (MSDS)</b> for all materials processed, used or produced as <b>Attachment H</b> . – For chemical processes, provide a MSDS for each compound emitted to the air.
25. Fill out the <b>Emission Units Table</b> and provide it as <b>Attachment I</b> .
26. Fill out the <b>Emission Points Data Summary Sheet (Table 1 and Table 2)</b> and provide it as <b>Attachment J</b> .
27. Fill out the <b>Fugitive Emissions Data Summary Sheet</b> and provide it as <b>Attachment K</b> .

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:

- |  |  |  |
|--|--|--|
| <input type="checkbox"/> Bulk Liquid Transfer (TLO/8E)   | <input type="checkbox"/> Haul Road Emissions     | <input type="checkbox"/> Quarry  |
| <input type="checkbox"/> Chemical Processes              | <input type="checkbox"/> Hot Mix Asphalt Plant   | <input type="checkbox"/> Solid Materials Sizing, Handling and Storage Facilities |
| <input type="checkbox"/> Concrete Batch Plant            | <input type="checkbox"/> Incinerator             | <input type="checkbox"/> Storage Tanks   |
| <input type="checkbox"/> Grey Iron and Steel Foundry     | <input type="checkbox"/> Indirect Heat Exchanger |  |
| <input type="checkbox"/> General Emission Unit, specify: |  |  |

Fill out and provide the Emissions Unit Data Sheet(s) as **Attachment L**.

29. Check all applicable **Air Pollution Control Device Sheets** listed below:

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Absorption Systems         | <input type="checkbox"/> Baghouse                   | <input type="checkbox"/> Flare                 |
| <input type="checkbox"/> Adsorption Systems         | <input type="checkbox"/> Condenser                  | <input type="checkbox"/> Mechanical Collector  |
| <input type="checkbox"/> Afterburner                | <input type="checkbox"/> Electrostatic Precipitator | <input type="checkbox"/> Wet Collecting System |
| <input type="checkbox"/> Other Collectors, specify: |   |  |

Fill out and provide the Air Pollution Control Device 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 *Example Legal Advertisement* for details). Please submit the Affidavit of Publication as **Attachment P** immediately upon receipt.

33. **Business Confidentiality Claims.** Does this application include confidential information (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 required when someone other than the responsible official signs the application. Check applicable Authority Form below: **NA**

- |  |   |
|--|---|
| <input type="checkbox"/> Authority of Corporation or Other Business Entity | <input type="checkbox"/> Authority of Partnership         |
| <input type="checkbox"/> Authority of Governmental Agency                  | <input type="checkbox"/> Authority of Limited Partnership |

Submit completed and signed Authority Form as **Attachment R**.

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: <b>PAUL HUNTER</b>	35C. Title: <b>GENERAL MANAGER, OHIO RIVER SUPPLY HUB</b>
35D. E-mail: <b>PAULV.HUNTER@WILLIAMS.COM</b>	36E. Phone: <b>(412) 787-5561</b>
	36F. FAX: <b>(412) 787-6002</b>
36A. Printed name of contact person: <b>ERIKA BALDAUFF</b>	36B. Title: <b>ENVIRONMENTAL SPECIALIST</b>
36C. E-mail: <b>ERIKA.BALDAUFF@WILLIAMS.COM</b>	36D. Phone: <b>(304) 843-4559</b>
	36E. FAX: <b>(304) 843-3131</b>

**PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED WITH THIS PERMIT APPLICATION:**

<input type="checkbox"/> Attachment A: Business Certificate	<input type="checkbox"/> Attachment K: Fugitive Emissions Data Summary Sheet
<input type="checkbox"/> Attachment B: Map(s)	<input type="checkbox"/> Attachment L: Emissions Unit Data Sheet(s)
<input type="checkbox"/> Attachment C: Installation and Start Up Schedule	<input type="checkbox"/> Attachment M: Air Pollution Control Device Sheet(s)
<input type="checkbox"/> Attachment D: Regulatory Discussion	<input type="checkbox"/> Attachment N: Supporting Emissions Calculations
<input type="checkbox"/> Attachment E: Plot Plan	<input type="checkbox"/> Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans
<input type="checkbox"/> Attachment F: Detailed Process Flow Diagram(s)	<input type="checkbox"/> Attachment P: Public Notice
<input type="checkbox"/> Attachment G: Process Description	<input type="checkbox"/> Attachment Q: Business Confidential Claims) (NA)
<input type="checkbox"/> Attachment H: Material Safety Data Sheets (MSDS)	<input type="checkbox"/> Attachment R: Authority Forms) (NA)
<input type="checkbox"/> Attachment I: Emission Units Table	<input type="checkbox"/> Attachment S: Title V Permit Revision Information) (NA)
<input type="checkbox"/> Attachment J: Emission Points Data Summary Sheet	<input type="checkbox"/> 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.*