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west virginia department of environmental protection

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Jim Justice, Governor  
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## Evaluation Memo

**Application Number:** R13-3289A  
**Facility ID Number:** 051-00157  
**Name of Applicant:** Williams Ohio Valley Midstream LLC (OVM)  
**Name of Facility:** Francis Compressor Station  
**Latitude/Longitude:** 39.87580/-80.69590  
**Application Type:** Class I Administrative Update  
**Submission Date:** January 13, 2017  
**Applicant Ad Date:** Not Applicable  
**Applicant Ad Newspaper:** Not Applicable  
**Complete Date:** January 13, 2017  
**Due Date:** **March 14, 2017**  
**Engineer:** Joe Kessler

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The Francis Compressor Station is a natural gas compressor station located at the existing Oak Grove Natural Gas Processing Facility. This facility is considered "one-source" with the Oak Grove Natural Gas Processing Facility (it has the same Facility ID Number 051-00157). The station consists of one (1) natural gas-fired Caterpillar G3516B 4-Stroke Lean Burn (4SLB) 1,380 horsepower (hp) compressor engine and one (1) electric Leroi LRG-DP compressor to provide additional pressure to pull natural gas into the adjacent processing plant.

### Description of Proposed Changes

On January 13, 2017, OVM submitted a Class I Administrative Update (A/U) to replace 40 CFR 60, Subpart OOOO requirements with 40 CFR 60, Subpart OOOOa requirements. This request is based on the construction date of the Francis Station, which occurred after the applicability date of Subpart OOOOa (see below). No physical changes or changes in the method of operation were proposed as part of this permitting action.

## Estimate of Emissions

OVM is not requesting any increase in emissions as a result of the proposed changes discussed above.

## Regulatory Applicability

*40CFR60 Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced after September 18, 2015*

40CFR60 Subpart OOOOa establishes emission standards and compliance schedules for the control of the pollutant greenhouse gases (GHG) and VOCs. The greenhouse gas standard in this subpart is in the form of a limitation on emissions of methane from affected facilities in the crude oil and natural gas source category that commence construction, modification or reconstruction after September 18, 2015. This subpart also establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO<sub>2</sub>) emissions from affected facilities that commence construction, modification or reconstruction after September 18, 2015 (40 CFR 60, Subpart OOOO is applicable to those sources constructed prior to this date but after August 23, 2011). As the Francis Compressor Station was constructed after September 18, 2015, the station is subject to the applicable provisions of Subpart OOOOa.

### Compressor Engines

Pursuant to §60.5365a(c), “[e]ach reciprocating compressor affected facility, which is a single reciprocating compressor [not located at a well site]” that is constructed after September 18, 2015 is subject to the applicable provisions of Subpart OOOOa. As the Francis Compressor Station is located before the point of custody transfer, the compressor engines are applicable to Subpart OOOOa. The substantive requirements for the engines are given under §60.5385a(a): the engines’ “rod packing” must be replaced according to the given schedule and the engine must meet applicable MRR given under §60.5410a(c), §60.5415a(c), and §60.5420a(b).

### Fugitive Emissions Components

Pursuant to §60.5365a(j), “[t]he collection of fugitive emissions components at a compressor station, as defined in §60.5430a, is an affected facility.” The Leak Detection and Repair (LDAR) requirements for a compressor station are given under §60.5497a.

*45CSR13: Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation*

The proposed changes to the Francis Compressor Station will not increase the PTE of any regulated pollutant, or result in a physical change or a change in the method of operation at the facility. Therefore, pursuant to §45-13-4.2(a)(4), OVM is requesting a Class I Administrative Update to make a “[c]hange in a permit condition to incorporate any new more stringent


requirements related to an applicable rule promulgated after the existing permit was issued and that do not result in a physical change in or change in the method of operation of the source." The existing Permit Number R13-3289 was issued on April 16, 2016 and 40 CFR 60, Subpart OOOOa was promulgated on June 3, 2016. Therefore, reviewing and issuing the proposed change under a Class I administrative Update is appropriate.

**Changes to Permit R13-3289**

Substantive changes to the permit are limited to replacing the 40 CFR 60, Subpart OOOO language under 4.1.2(g) and 4.1.4(d) with the applicable language of 40 CFR 60, Subpart OOOOa.

**Recommendation**

The information provided in the permit application indicates that compliance with all applicable state and federal air quality regulations will continue to be achieved. Therefore, I recommend the issuance of the Class I Administrative Update R13-3289A to Williams Ohio Valley Midstream LLC for the changes outlined above.

  
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Joe Kessler, PE  
Engineer

1/25/17  
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Date