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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-2765B
Plant ID No.:	039-00046
Applicant:	Cranberry Pipeline Corporation
Facility Name:	Bonham Compressor Station
Location:	Sissonville, Kanawha County
NAICS Code:	211111
SIC Code:	4922
Application Type:	Modification
Received Date:	April 27, 2015
Engineer Assigned:	Joe Kessler
Fee Amount:	$2,000
Date Received:	May 1, 2015
Complete Date:	May 27, 2015
Due Date:	August 25, 2015
Applicant's Ad Date:	April 28, 2015
Newspaper:	*Charleston Gazette*
UTM's:	Easting: 441.64 km Northing: 4,263.22 km Zone: 17
Latitude/Longitude:	38.517350°/-81.668240°
Description:	Addition of one (1) new Generac 4SRB 63 hp emergency generator and the after-the-fact permitting of one (1) additional storage tank, flashing emissions, truck loading operations, and fugitive emissions that were not previously addressed.

On April 27, 2015, Cranberry Pipeline Corporation (Cranberry) submitted a permit application to modify the Bonham Compressor Station located in Sissonville, Kanawha County, WV. The Bonham Station was an existing grandfathered compressor station (constructed in 1941) until the facility replaced the existing engines (and added a glycol dehydration unit) under R13-2526 (issued on April 17, 2003) to become a minor source under Title V. Since the issuance of R13-2526, the facility has been the subject of several other new source review (NSR) permitting actions.

- On April 18, 2006, Cranberry was issued General Permit Registration G60-C034 for the installation of one (1) additional compressor engine and to replace the dehydration unit. The entire facility was brought under the general permit;

- On June 10, 2008, Cranberry was issued Permit Number R13-2765 for the addition of a BTEX Elimination System, an increase of the dehydrator gas throughput from 5 MMscf/day to 12 MMscf/day, installation of a 0.275 MMBtu/hr reboiler, and the removal of a compressor engine; and

- On March 11, 2011, Cranberry was issued Permit Number R13-2765A for the addition of a compressor engine.

DESCRIPTION OF PROCESS/MODIFICATION

Existing Facility

The existing Bonham Station is a natural gas compressor station that dehydrates and compresses natural gas before sending it via pipeline to other facilities for further processing or distribution. To effect this, the facility consists of two (2) 384 horsepower (hp) AJAX DPC-2802 LE Compressor Engines, one (1) 800 hp AJAX DPC-2804 LE Compressor Engine, one (1) 40 hp AJAX C-42 Compressor Engine, one (1) 12 mmscf/day triethylene glycol (TEG) dehydration unit (GDU), and various material storage tanks.

Proposed Modifications

Cranberry has now submitted a permit application to:

- Add one uncontrolled 63 hp Generac Model QTO3624KNAX 4-Stroke Rich Burn (4SRB) Emergency Generator (4S);

- Add one (1) existing 4,200 gallon offsite pipeline liquids storage tank (T7) not previously permitted and modify the size and materials stored in other tanks;

- Quantify potential flashing emissions (uncontrolled) from the onsite pipeline liquids storage tank (T1);

- Add truck loading operations (uncontrolled) to the permit (TL-1); and

- Quantify potential fugitive emissions from the facility.

Bonham station contains three 4,200 gallon offsite-pipeline fluid tanks (T2, T3, and T7) which are not connected to any onsite processing equipment. These three tanks act as temporary holding/settling vessels for mixed pipeline fluids that are trucked in from area wells. The three tanks, along with the station's pipeline fluids tank (T1) are emptied by 4,200 gallon tank trucks in the truck loading operation (TL-1).

SITE INSPECTION

Due to the nature of the proposed modification, a site inspection by the writer was deemed as not necessary. The facility was last inspected by DAQ Compliance/ Enforcement (C/E) Inspector Mike Rowe on September 29, 2010. This inspection found the facility be "Status 30 - In Compliance."

AIR EMISSIONS AND CALCULATION METHODOLOGIES

Cranberry provided an air emissions estimate for equipment added and modified as part of this permitting action. The proposed changes were noted above. The following will only discuss in detail only those emission units proposed to be modified as part of this permitting process.

Emergency Generator

Potential emissions from the 63 hp Generac Model QTO3624KNAX 4SRB Emergency Generator (4E) were based on emission factors provided by the engine vendor and as given in AP-42, Section 3.2 (AP-42 is a database of emission factors maintained by USEPA). Hourly emissions were based on the (as calculated using a fuel heat rating of 8,143.8 Btu/hp-hr) maximum design heat input (MDHI) of the engines of 0.51 mmBtu/hr and the maximum hp rating. Annual emissions were based on the engine operating 500 hours/year. The following table details the potential-to-emit (PTE) of each compressor engine:

Table 1: Emergency Generator PTE

Pollutant	Emission Factor	Source	Hourly (lb/hr)	Annual (ton/yr)
CO	75.70 g/hp-hr	Engine Vendor	10.51	2.63
NO_X	3.94 g/hp-hr	Engine Vendor	0.55	0.14
$PM_{2.5}$(1)	19.41 x 10^{-3} lb/mmBtu	AP-42, Table 3.2-3	0.01	0.002
PM_{10}(1)	19.41 x 10^{-3} lb/mmBtu	AP-42, Table 3.2-3	0.01	0.002
PM(1)	19.41 x 10^{-3} lb/mmBtu	AP-42, Table 3.2-3	0.01	0.002
SO_2	5.88 x 10^{-4} lb/mmBtu	AP-42, Table 3.2-3	~0.00	~0.00
VOCs	1.56 g/hp-hr(2)	Engine Vendor	0.22	0.05
Total HAPs	Various	AP-42, Table 3.2-3	0.02	0.004
Formaldehyde	2.05 x 10^{-2} lb/mmBtu	AP-42, Table 3.2-3	0.01	0.003

(1) Includes condensables as calculated by the writer.
(2) Vendor factor is for Total Hydrocarbons (THC) but is used here as a conservative VOC estimate.

Storage Tanks

Cranberry provided an estimate of the uncontrolled working/breathing emissions produced from the four (4) pipeline liquids storage tanks (T1 through T3 and T7) using the TANKS 4.09d program as provided under AP-42, Section 7 and using the Vasquez-Beggs Correlation calculations for estimating flashing losses from the onsite-pipeline liquids storage tank. Annual throughputs of 50,400 gallons and 25,200 gallons of offsite and onsite pipeline liquids were used in the calculations.

The breathing loss refers to the loss of vapors as a result of tank vapor space breathing (resulting from temperature and pressure differences) that occurs continuously when the tank is storing liquid. The working loss refers to the loss of vapors as a result of tank filling or emptying operations. Standing losses are independent of storage tank throughput while working losses are dependent on throughput.

Flashing losses occur when a liquid with entrained gases goes from a higher-pressure to a lower-pressure. As the pressure on the liquid drops some of the lighter compounds dissolved in the liquid are released or "flashed" and some of the compounds that are liquids at the initial pressure/temperature transform from a liquid into a gas/vapor and are also released or "flashed" from the liquid. As these gases are released, some of the heavier compounds in the liquids may become entrained in these gases and will be emitted with them. Flashing losses are greater as the pressure drop increases and as the amount of lighter hydrocarbons in the liquid increased. Using the Vasquez-Beggs Correlation calculations for estimating flashing losses from storage tanks is an accepted calculation method.

Truck Loadouts

Air emissions from pipeline liquids truck loading operations (TL-1) occur as fugitive emissions generated by displacement of vapors when loading trucks. The emission factor used to generate the VOC emissions is based on Equation (1) of AP-42 Section 5.2-4. In this equation, Cranberry used variables specific to the liquids loaded and to the method of loading - in this case "submerged filling - dedicated normal service." Additionally, worst-case annual emissions were based on a maximum loading rate of 50,400 gal/year of onsite liquids and 25,200 gal/year of offsite liquids. Maximum hourly loadout emissions were recalculated by the writer based on loading out one (1) 4,200 gallon truck/hour.

Fugitives

Cranberry based their fugitive equipment leak calculations on emission factors taken from the document EPA-453/R-95-017 - "Protocol for Equipment Leak Emission Estimates" and on default conservative component counts given under 40 CFR Part 98. Emission factors were taken from Table 2-4 (OIL AND GAS PRODUCTION OPERATIONS AVERAGE EMISSION FACTORS (kg/hr/source)) and no control efficiency, as based on a Leak Detection and Repair (LDAR) protocol, was applied. VOC emissions were specifically calculated based on a representative gas sample (with appropriate constituent concentrations) from a nearby facility.

Emissions Summary

Based on the above, the potential-to-emit (PTE) associated with the new and modified equipment (which in this case, will be considered the increase in PTE as a result of this permitting action) is given in the following tables:

Table 2: Modification Hourly (lb/hr) PTE Summary.

Source	CO	NO_x	PM[1]	SO_2	VOCs	HAPs
Emergency Generator	10.51	0.55	0.01	~0.00	0.22	0.02
Storage Tanks[2]	0.00	0.00	0.00	0.00	1.10	~0.00
Truck Loadout[3]	0.00	0.00	0.00	0.00	8.45	~0.00
Fugitives	0.00	0.00	0.00	0.00	0.01	0.00
Modification Totals →	**10.51**	**0.55**	**0.01**	**0.00**	**9.79**	**0.02**

(1) Conservatively, all particulate matter emissions are assumed to be less than 2.5 microns. Includes condensables.
(2) Including flashing emissions.
(3) As recalculated by the writer.

Table 3: Modification Annual (ton/yr) PTE Summary.

Source	CO	NO_x	PM[1]	SO_2	VOCs	HAPs
Emergency Generator	2.63	0.14	0.002	~0.00	0.05	0.004
Storage Tanks[2]	0.00	0.00	0.00	0.00	4.83	~0.00
Truck Loadout	0.00	0.00	0.00	0.00	0.08	~0.00
Fugitives	0.00	0.00	0.00	0.00	0.06	0.00
Facility-Wide Totals →	**2.63**	**0.14**	**0.002**	**0.00**	**5.01**	**0.004**

(1) Conservatively, all particulate matter emissions are assumed to be less than 2.5 microns. Includes condensables.
(2) Including flashing emissions.

Based on the limits in the draft permit and previous fact sheets, the post-modification facility-wide annual PTE is given in the following table:

Table 4: Facility-Wide Post-Modification Annual (ton/yr) PTE Summary.

Source	CO	NO_x	PM[1]	SO_2	VOCs	HAPs
Dehydration Unit	0.00	0.00	0.00	0.00	0.12	0.070
Dehydration Reboiler	0.22	0.26	0.02	~0.00	0.39	~0.00
Compressor Engines	19.44	31.96	2.13	0.04	18.32	2.90[2]
Emergency Generator	2.63	0.14	0.002	<0.01	0.05	0.004
Storage Tanks[3]	0.00	0.00	0.00	0.00	4.83	~0.00

Source	CO	NO_x	PM[(1)]	SO_2	VOCs	HAPs
Truck Loadout	0.00	0.00	0.00	0.00	0.08	~0.00
Fugitives	0.00	0.00	0.00	0.00	0.06	0.00
Facility-Wide Totals →	**22.29**	**32.36**	**2.15**	**0.05**	**23.84**	**2.97**

(1) Conservatively, all particulate matter emissions are assumed to be less than 2.5 microns. Includes condensables.
(2) No total HAP emissions limits are given in the existing permit for compressor engines, this number represents total formaldehyde emissions taken from previous fact sheets.
(3) Including flashing emissions.

REGULATORY APPLICABILITY

The following will discuss only the regulatory applicability of general rules and specific rules to the new and modified emission units proposed as part of this permitting action.

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 Bonham Compressor Station have the potential to increase the PTE of the facility in excess of one hundred forty-four (144) pounds per calendar day of a regulated pollutant and, therefore, pursuant to §45-13-2.17, the changes are defined as a "modification" under 45CSR13. Pursuant to §45-13-5.1, "[n]o person shall cause, suffer, allow or permit the construction, modification, relocation and operation of any stationary source to be commenced without . . . obtaining a permit to construct." Therefore, Cranberry is required to obtain a permit under 45CSR13 for the modification of the facility.

As required under §45-13-8.3 ("Notice Level A"), Cranberry placed a Class I legal advertisement in a "newspaper of *general circulation* in the area where the source is . . . located." The ad ran on April 28, 2015 in the *Charleston Gazette* and the affidavit of publication for this legal advertisement was submitted on May 14, 2015.

45CSR14: Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration - (NON APPLICABILITY)

The Bonham Compressor Station is located in Kanawha County, WV. Kanawha County is classified as "in attainment" with all National Ambient Air Quality Standards. Therefore, as the facility is not a "listed source" under §45-14-2.43, the individual major source applicability threshold for all pollutants is 250 TPY. As given in Table 3 above, the post-modification facility-wide PTE of the Bonham Compressor Station remains less than 250 TPY for all criteria pollutants. Therefore, the facility is not defined as a "major stationary source" under either 45CSR14 and is not subject to review requirements therein.

45CSR30: Requirements for Operating Permits - (NON APPLICABILITY)

45CSR30 provides for the establishment of a comprehensive air quality permitting system consistent with the requirements of Title V of the Clean Air Act. The Bonham Compressor Station does not meet the definition of a "major source under §112 of the Clean Air Act" as outlined under §45-30-2.26 and clarified (fugitive policy) under 45CSR30b. The proposed facility-wide PTE (see Table 4) of any regulated pollutant does not exceed 100 TPY. Additionally, the facility-wide PTE does not exceed 10 TPY of any individual HAP or 25 TPY of aggregate HAPs.

However, as the facility is subject to two New Source Performance Standard (NSPS) - 40 CFR 60, Subpart JJJJ and Subpart OOOO - and two Maximum Achievable Control Technology (MACT) rules - 40 CFR 63, Subpart ZZZZ and 40 CFR 63, Subpart HH, the facility would, in most cases, be subject to Title V as a "deferred source." However, pursuant to §60.4230(c), §60.5370(c), §63.6585(d), and §63.760(h) as a non-major "area source," Cranberry is not required to obtain a Title V permit for the proposed facility. Therefore, the facility is not subject to 45CSR30.

Subpart Kb—Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 - (NON APPLICABILITY)

Pursuant to §60.110b, 40 CFR 60, Subpart Kb applies to "each storage vessel with a capacity greater than or equal to 75 cubic meters (m^3) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984." The largest storage tanks proposed for the Bonham Compressor Station are each 4,200 gallons, or 16 m^3. Therefore, Subpart Kb does not apply to any new or modified storage tanks at the facility.

40 CFR 60 Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

Cranberry's proposed new Generac Model QTO3624KNAX 63 hp 4SRB Emergency Generator is defined under 40 CFR 60, Subpart JJJJ as stationary spark-ignition internal combustion engine (SI ICE) and is, pursuant to §60.4230(a)(4)(iv), subject to the applicable provisions of the rule. Pursuant to §60.4233(d): "Owners and operators of stationary SI ICE with a maximum engine power greater than 19 KW (25 HP) and less than 75 KW (100 HP) (except gasoline and rich burn engines that use LPG) must comply with the emission standards for field testing in 40 CFR 1048.101(c) for their non-emergency stationary SI ICE and with the emission standards in Table 1 to this subpart for their emergency stationary SI ICE." Therefore, as the proposed Cranberry emergency generator is greater than 25 hp and less than 100 hp, the engine must comply with the emission standards under Table 1 for "Emergency SI ICE 25<hp<130 manufactured after January 1, 2009:" NO_x + HC - 10 g/HP-hr, CO - 387 g/HP-hr. The emission standards and the proposed compliance therewith of the engines are given in the following table:

Table 5: Generac Model QTO3624KNAX Subpart JJJJ Compliance

Pollutant	Standard (g/HP-hr)	Uncontrolled Emissions (g/bhp)	Control Percentage	Controlled Emissions (g/bhp)[1]	JJJJ Compliant?
NO_x + HC	10	5.50	0.00%	5.50	Yes
CO	387	75.70	0.00%	75.70	Yes

Cranberry has submitted an EPA-Certificate of Conformity for the engine family the Generac Model QTO3624KNAX is a member of. As a certified engine, no performance testing is required for the engine.

40 CFR 60, Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution

On April 27, 2012, the USEPA issued a final rule (with amendments finalized on August 16, 2012) that consists of federal air standards for natural gas wells that are hydraulically fractured, along with requirements for several other sources of pollution in the oil and gas industry that currently are not regulated at the federal level. Each potentially applicable section of Subpart OOOO to a modified unit is discussed below.

Storage Tanks - (NON APPLICABILITY)

Pursuant to §60.5365(e), for "[e]ach storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment" that is constructed after August 23, 2011 and, pursuant to §60.5395 has "VOC emissions equal to or greater than 6 tpy" must meet the control requirements under §60.5395 as of October 15, 2013. All of the storage tanks at the Bonham facility, with the exception of the TEG tank in the dehydration unit, were constructed prior to August 23, 2011. Due to the low vapor pressure of TEG, no emissions are expected from this tank. Therefore, Subpart OOOO is not applicable to the storage tanks.

40 CFR 63 Subpart HH: National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

The glycol dehydration unit has not been modified as part of this permitting action. However, on June 1, 2013 the DAQ took delegation of the area source provisions of 40 CFR 63, Subpart HH. Pursuant to §63.760(a)(3), as the Bonham Compressor Station - an area source of HAPs (see Table 4) - "process[es], upgrade[s], or store[s] natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user," it is defined as an area source subject to the applicable provisions under Subpart HH. When the GDU was originally permitted, the DAQ had not yet taken delgation of the area source provisions of Subpart HH. Therefore, compliance with Subpart HH will be determined in this permitting action.

Pursuant to §63.760(b)(2), each TEG GDU located at an area source that meets the requirements under §63.760(a)(3) is defined as an affected facility under Subpart HH. The requirements for affected sources at area sources are given under §63.764(d). However, for a GDU, exemptions to these requirements are given under §63.764(e): if (1) "actual annual average flowrate of natural gas to the glycol dehydration unit is less than 85 thousand standard cubic meters [3 mmscf/day] per day" or (2) "actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram [1 TPY] per year."

Pursuant to information in the existing permit, the maximum aggregate PTE of benzene emissions from the GDU process vent is 0.01 TPY. Therefore, the GDU is exempt from the Subpart HH requirements given under §63.764(d).

40 CFR 63 Subpart ZZZZ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

On June 1, 2013 the DAQ took delegation of the area source provisions of 40 CFR 63, Subpart ZZZZ. As the Bonham Compressor Station is defined as an area source of HAPs (see Attachment A), the facility is subject to applicable requirements of Subpart ZZZZ. Pursuant to §63.6590(c):

> An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

§63.6590(c)(1) specifies that "[a] new or reconstructed stationary RICE located at an area source" is defined as a RICE that shows compliance with the requirements of Subpart ZZZZ by "meeting the requirements of . . . 40 CFR part 60 subpart JJJJ, for spark ignition engines." Pursuant to §63.6590(a)(2)(iii), a "stationary RICE located at an area source of HAP emissions is new if [the applicant] commenced construction of the stationary RICE on or after June 12, 2006." The new engine proposed for the Bonham Compressor Station is defined as a new stationary RICE (application states manufacture date of engines is December 2014) and, therefore, will show compliance with Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart JJJJ. Compliance with Subpart JJJJ is discussed above.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

This section provides an analysis for those regulated pollutants that may be emitted from the modified Bonham Compressor Station and that are not classified as "criteria pollutants." Criteria pollutants are defined as Carbon Monoxide (CO), Lead (Pb), Oxides of Nitrogen (NO_x), Ozone, Particulate Matter (PM), Particulate Matter less than 10 microns (PM_{10}), Particulate Matter less than 2.5 microns ($PM_{2.5}$), and Sulfur Dioxide (SO_2). These pollutants have National Ambient Air Quality Standards (NAAQS) set for each that are designed to protect the public health and welfare. Other pollutants of concern, although designated as non-criteria and without national concentration standards, are regulated through various federal and programs designed to limit their emissions and public exposure. These programs include federal source-specific Hazardous Air Pollutants (HAPs) limits promulgated under 40 CFR 61 (NESHAPS) and 40 CFR 63 (MACT). Any potential applicability to these programs for the modified sources were discussed above under REGULATORY APPLICABILITY.

The majority of non-criteria regulated pollutants fall under the definition of HAPs which, with some revision since, were 188 compounds identified under Section 112(b) of the Clean Air Act (CAA) as pollutants or groups of pollutants that EPA knows or suspects may cause cancer or other

serious human health effects. The only HAP potentially emitted in a substantive amount from the new or modified equipment is formaldehyde. The following table lists the HAP's carcinogenic risk (as based on analysis provided in the Integrated Risk Information System (IRIS)):

Table 4: Potential HAPs - Carcinogenic Risk

HAPs	Type	Known/Suspected Carcinogen	Classification
Formaldehyde	VOC	Yes	B1 - Probable Human Carcinogen

All HAPs have other non-carcinogenic chronic and acute effects. These adverse health affects may be associated with a wide range of ambient concentrations and exposure times and are influenced by source-specific characteristics such as emission rates and local meteorological conditions. Health impacts are also dependent on multiple factors that affect variability in humans such as genetics, age, health status (e.g., the presence of pre-existing disease) and lifestyle. As stated previously, *there are no federal or state ambient air quality standards for these specific chemicals*. For a complete discussion of the known health effects of each compound refer to the IRIS database located at *www.epa.gov/iris*.

AIR QUALITY IMPACT ANALYSIS

The estimated maximum increase in emissions are less than applicability thresholds that would define the proposed modification as "major" under 45CSR14 and, therefore, no air quality impacts modeling analysis was required. Additionally, based on the nature of the modification and the location of the source, an air quality impacts modeling analysis was not required under 45CSR13, Section 7.

MONITORING, COMPLIANCE DEMONSTRATIONS, REPORTING, AND RECORDING OF OPERATIONS

The only substantive change to the monitoring, compliance demonstrations, reporting, and recording of operations in the draft permit was the addition of hours of operation monitoring/recording for the new emergency generator and the monitoring/recording of pipeline liquids throughput in the storage tanks.

PERFORMANCE TESTING OF OPERATIONS

There was no change in the performance testing requirements.

CHANGES TO PERMIT R13-2765A

The substantive changes made changes to R13-2765A were limited to:

- Emission Units Table 1.0 of the draft permit was revised and updated with the emergency generator, truck loading, and fugitive emission sources and storage tank information was corrected;

- New requirement 5.1.9. was added to the draft permit to address the new emergency generator;

- Exemption language from 40 CFR 63, Subpart HH was added to 6.1.5. of the draft permit; and

- A new section 7.0 was added to the draft permit to address the storage tanks, truck loading operations, and fugitive emissions.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that compliance with all applicable state and federal air quality regulations will be achieved. Therefore, I recommend to the Director the issuance of a Permit Number R13-2765B to Cranberry Pipeline Corporation for the proposed modification of the Bonham Compressor Station located in Sissonville, Kanawha County, WV.

_____
Joe Kessler, PE
Engineer

_____
Date