west virginia department of environmental protection

Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone 304/926-0475

Jim Justice, Governor
Austin Caperton, Cabinet Secretary
www.wvdep.org

March 22, 2017

Matthew J. McGuire
mmcguire@hgenergyllc.com
5260 Dupont Road
Parkersburg, WV 26101

RE: Approved Registration G35-D122
HG Energy, LLC
Gans Compressor Station
Facility ID No. 061-00149

Dear Mr. McGuire:

The Director has determined that the submitted Registration Application and proposed modification and operation of a natural gas compressor station demonstrates eligibility and compliance with the requirements, provisions, standards and conditions of General Permit G35-D and hereby grants General Permit registration authorizing the proposed activity.

Please be aware of the actions required in Monitoring Requirements, Testing Requirements, Recordkeeping Requirements, and the Reporting Requirements.

Should you have any questions, please contact the undersigned engineer at (304)926-0499 ext. 1687.

Sincerely,

Richard A. Boehm, P.E.
Engineer

Enclosures: Registration G35-D122

West Virginia Department of Environmental Protection
Division of Air Quality

Jim Justice
Governor

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Cabinet Secretary

Class II General Permit
G35-D Registration to Modify

for the
Prevention and Control of Air Pollution in regard to the
Construction, Modification, Relocation, Administrative Update and
Operation of Oil and Natural Gas Compressor and/or Dehydration Facilities

The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of General Permit G35-D.

G35-D122
Issued to:
HG Energy, LLC
Gans Station
061-00149

William F. Durham
Director

Issued: March 22, 2017

This Class II General Permit Registration will supercede and replace R13-2720C

Facility Location:	Morgantown, Monongalia County, West Virginia
Mailing Address:	5260 Dupont Road, Parkersburg, WV 26101
Physical Address:	Springhill, PA (on state line), Monongalia County, West Virginia
Facility Description:	Natural Gas Compressor Station
NAICS Code:	211111
SIC Code:	1311
Longitude Coordinates:	-79.793611
Latitude Coordinates:	39.720556
Directions to Facility:	At Morgantown, going on I-68 East, take the Cheat Lake exit onto Route 857 North. Go approximately 6 miles and turn right into Laurel Aggregates Quarry. Stay to the left while going toward Lake Lynn Laboratory for 0.9 mile. Turn right, go 0.3 mile. Turn right, through gate to compressor site.
Registration Type:	Modification
Description of Change:	Decrease the existing compressors at the facility, reducing the overall emissions by replacing two existing engines (AJAX 2802LE) with a single engine (Caterpillar G3508TALE).

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit or registration issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is not subject to 45CSR30.

Permit Section Applicability for the Registrant

All registered facilities under General Permit G35-D are subject to Sections 1.0, 2.0, 3.0, and 4.0 of General Permit G35-D.

The following additional sections of General Permit G35-D apply to the registrant:

GENERAL PERMIT G35-D APPLICABLE SECTIONS	
☒ Section 5.0	Storage Vessels Containing Condensate and/or Produced Water[1]
☐ Section 6.0	Storage Vessel Affected Facility (NSPS, Subpart OOOO/OOOOa)
☐ Section 7.0	Control Devices and Emission Reduction Devices not subject to NSPS Subpart OOOO and/or NESHAP Subpart HH
☒ Section 8.0	Small Heaters and Reboilers not subject to 40CFR60 Subpart Dc
☒ Section 9.0	Pneumatic Controllers Affected Facility (NSPS, Subpart OOOO/OOOOa)
☐ Section 10.0	Centrifugal Compressor Affected Facility (NSPS, Subpart OOOO/OOOOa)[2]
☐ Section 11.0	Reciprocating Compressor Affected Facility (NSPS, Subpart OOOO/OOOOa)[2]
☒ Section 12.0	Reciprocating Internal Combustion Engines, Generator Engines. Microturbine Generators
☒ Section 13.0	Tanker Truck Loading[3]
☒ Section 14.0	Glycol Dehydration Units[4]
☒ Section 15.0	Blowdown and Pigging Operations
☒ Section 16.0	Fugitive Emission Components (NSPS, Subpart OOOOa)

1 *Registrants that are subject to Section 5 may also be subject to Section 6 if the applicant is subject to the NSPS, Subpart OOOO/OOOOa control requirements or the applicable control device requirements of Section 7.*

2 *Registrants that are subject to Section 10 and 11 are also subject to the applicable RICE requirements of Section 12.*

3 *Registrants that are subject to Section 13 may also be subject to control device and emission reduction device requirements of Section 7.*

4 *Registrants that are subject to Section 14 are also subject to the requirements of Section 8 (reboilers). Registrants that are subject to Section 14 may also be subject to control device and emission reduction device requirements of Section 7.*

STORAGE VESSELS

Emission Unit ID#	Emission Point ID#	Content	Maximum Volume (gal)	Annual Throughput Limit (gal/yr)	Control Device ID#	Manuf. Date	Year Installed/ Modified	VRU	Subject to 40CFR60 Subpart OOOO/OOOOa?[1]	G35-D Applicable Sections
TK-1	TK-1	Brine/Pipeline Liquids	2,100	3,320	N/A	2007	2007	N/A	☐ OOOO ☐ OOOOa ☒ No	5
TK-2	TK-2	Brine/Pipeline Liquids/Oil	2,100	3,320	N/A	2007	2007	N/A	☐ OOOO ☐ OOOOa ☒ No	5

[1] Commenced construction, modification or reconstruction after August 23, 2011 and on or before September 18, 2015 for 40CFR60 Subpart OOOO.
Commenced construction, modification or reconstruction after September 18, 2015 for 40CFR60 Subpart OOOOa.

FUEL BURNING UNITS

See Section 8.0

Emission Unit ID#	Emission Point ID#	Description	MDHI (MMBTU/hr)	Year Installed/ Modified	G35-D Applicable Sections
DHY-1	RBL-1	TEG Dehydrator Reboiler	.200	2015	8

PNEUMATIC CONTROLLERS

Are there any applicable pneumatic controllers subject to 40CFR60 Subpart OOOO/OOOOa at this facility?

☐ 40CFR60 Subpart OOOO
☐ 40CFR60 Subpart OOOOa
☒ No

Approximate Number of 40CFR60 Subpart OOOO applicable Pneumatic Controllers
Approximate Number of 40CFR60 Subpart OOOOa applicable Pneumatic Controllers

See Section 9.0

CENTRIFUGAL COMPRESSORS

Are there any applicable centrifugal compressors subject to 40CFR60 Subpart OOOO/OOOOa at this facility?

☐ Yes ☒ No

See Section 10.0

Description	Requirement
N/A	☐ 40CFR60 Subpart OOOO ☐ 40CFR60 Subpart OOOOa

RECIPROCATING COMPRESSORS

Are there any applicable reciprocating compressors subject to 40CFR60 Subpart OOOO/OOOOa at this facility?

☒ Yes ☐ No

See Section 11.0

Description	Requirement
Caterpillar G3508TALE	☐ 40CFR60 Subpart OOOO ☒ 40CFR60 Subpart OOOOa

RECIPROCATING INTERNAL COMBUSTION ENGINES

See Section 12.0

Emission Unit ID#	Emission Point ID#	Make/Model/HP	Control Device ID#	Year Installed/ Modified	Engine Manufacture Date	Subject to 13.1.4/ 13.2.1	Engine Type	Applicable Rules	40CFR63 Subpart ZZZZ New or Existing?
CE-1	CE-1	Caterpillar G3508TALE	N/A	2017	2/15/2006	☐ Yes ☒ No	☐ 2SLB ☒ 4SLB ☐ 4SRB	☐ 40CFR60 Subpart JJJJ ☐ Certified? ☐ 40CFR60 Subpart IIII ☐ Certified? ☒ 40CFR63 Subpart ZZZZ ☐ NESHAP ZZZZ/ NSPS JJJJ Window	☒ New ☐ Existing
ACE-1	ACE-1	Kohler	N/A	2014	3/20/2007	☐ Yes ☒ No	☐ 2SLB ☒ 4SLB ☐ 4SRB	☒ 40CFR60 Subpart JJJJ ☐ Certified? ☐ 40CFR60 Subpart IIII ☐ Certified? ☐ 40CFR63 Subpart ZZZZ ☐ NESHAP ZZZZ/ NSPS JJJJ Window	☒ New ☐ Existing

New or reconstructed sources in accordance with 63.76590(c) must only meet the requirements of 40CFR60 Subparts IIII or JJJJ.

SPARK IGNITION RECIPROCATING INTERNAL COMBUSTION ENGINES TESTING REQUIREMENTS

See Section 12.0

Emission Unit ID#	Emission Point ID#	Make/Model/HP	Control Device ID#	Year Installed/ Modified	Engine Manufacture Date	40CFR60 Subpart JJJJ Testing Requirements
N/A	N/A	N/A	N/A	N/A	N/A	☐ Initial Performance Test ☐ Every 8,760 hours of operation or 3 years (whichever comes first)

TANKER TRUCK LOADOUT

Are there any tanker truck loadout operations at this facility?

☒ Yes ☐ No

See Section 13.0

Emission Unit ID#	Emission Point ID#	Description	Annual Throughput Limit (gal/yr)	Year Installed/ Modified	Control Device ID#	Closed System Collection?
TL-1	TL-1	Truck Loading of Brine/Pipeline Fluids	6,640	2007	N/A	☐ Tanker trucks passing the MACT level annual leak test ☐ Tanker trucks passing the NSPS level annual leak test ☐ Tanker trucks not passing one of the above annual leak tests but has vapor return

GLYCOL DEHYDRATION UNITS

Are there any glycol dehydration units at this facility?

☒ Yes ☐ No

See Section 14.0

Emission Unit ID#	Emission Point ID#	Description (Make, Model)	Year Installed/ Modified	Subject to 40CFR63 Subpart HH?[1]	40CFR63 Subpart HH Exemptions	Max Dry Gas Flow Rate (mmscf/day)	APCD/ERD ID#
STL-1	STL-1	TEG Regenerator Still Vent	2015	☒ Yes ☐ Pump Optimization ☐ No	☒ Benzene Exemption ☐ Flowrate Exemption	6.5	N/A

[1] If Yes, specify if registrant meets benzene or flowrate exemption.

BLOWDOWN AND PIGGING OPERATIONS

See Section 15.0

Type of Event	# of Events (event/yr)	Amount Vented per event (scf/event)	MW of vented gas (lb/lb-mol)	Total Emissions (ton/yr)	VOC weight fraction	VOC emissions (ton/yr)
Compressor Blowdown	12	586	16.44	0.1525	0.12	0.00018
Compressor Startup	12	586	16.44	0.1525	0.12	0.00018
Plant Shutdown						
Low Pressure Pig Venting						
High Pressure Pig Venting						

Type of Event	# of Events (event/yr)	Amount Vented per event (scf/event)	MW of vented gas (lb/lb-mol)	Total Emissions (ton/yr)	HAP weight fraction	HAP emissions (ton/yr)
Compressor Blowdown	12	586	16.44	0.1525	0	0
Compressor Startup	12	586	16.44	0.1525	0	0
Plant Shutdown						
Low Pressure Pig Venting						
High Pressure Pig Venting						

FUGITIVE EMISSION COMPONENTS

Is the facility subject to quarterly LDAR monitoring under 40CFR60 Subpart OOOOa?

☐ Yes
☒ No

See Section 16.0

AIR POLLUTION CONTROL DEVICES

Are there any air pollution control devices at this facility?

☐ Yes ☒ No

See Sections 6.0, 7.0

Control Device ID#	Control Efficiency (%)	Control Device Description (Make/Model)	Year Installed/ Modified	Max Design Capacity (state units)	Subject to:
N/A	N/A	N/A	N/A	N/A	☐ Section 6.0 ☐ Section 7.0

EMISSION REDUCTION DEVICES (ERD)

Are there any ERDs (VRU, Recycled Reboiler, BTEX Eliminator, etc.) at this facility?

☐ Yes ☒ No

See Sections 6.0, 7.0

ERD ID#	ERD Efficiency (%)	ERD Description (Make/Model)	Year Installed/ Modified	Max Design Capacity (state units)
N/A	N/A	N/A	N/A	N/A

EMISSION LIMITATIONS

Emission Unit ID#	Emission Point ID#	Emission Unit Description	Pollutant	Maximum Potential Emissions	
				Hourly (lb/hr)	Annual (tons/year)
CE-1	CE-1	Caterpillar G3508TALE	Nitrogen Oxides	2.77	12.17
			Carbon Monoxide	2.222	9.73
			Volatile Organic Compounds	0.389	1.70
			Formaldehyde	0.347	1.52
ACE-1	ACE-1	Kohler	Nitrogen Oxides	0.19	0.83
			Carbon Monoxide	7.85	34.38
			Volatile Organic Compounds	0.19	0.83
			Formaldehyde	0.01	0.044
DEHY-1	RBL-1	TEG Dehydrator Reboiler	Nitrogen Oxides	0.02	0.09
			Carbon Monoxide	0.02	0.07
			Volatile Organic Compounds	0.001	0.005
DEHY-1	STL-1	TEG Dehydrator Still Vent	Volatile Organic Compounds	0.07	0.29
			Benzene	<0.01	0.015
			Toulene	<0.01	0.02
			Ethylbenzene	<0.01	0.02
			Xylenes	<0.01	0.03
TL-1	TL-1	Tanker Truck Loading	Volatile Organic Compounds	0.01	0.024
			Total HAPs	0.0001	0.0002