

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-07900046-2016**  
Application Received: **July 21, 2016**  
Plant Identification Number: **079-00046**  
Permittee: **Cranberry Pipeline Corporation**  
Facility Name: **Heizer Compressor Station**  
Mailing Address: **Heizer Creek Road, Poca, WV 25159**

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Physical Location: Poca, Putnam County, West Virginia  
UTM Coordinates: 432.48 km Easting • 4263.99 km Northing • Zone 17  
Directions: From State Route 62 near Poca, turn onto Heizer Creek Road. Travel approximately 5.4 miles to the station on the left.

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### Facility Description

The Heizer Compressor Station is a natural gas transmission facility which consists of a TEG dehydrator, a dehydrator reboiler, a 440 HP natural gas compressor engine, a 880 HP natural gas compressor engine, and four storage tanks (2,100 gallon pipeline fluids, 3,000 gallon new oil, 1,050 gallon used oil, and 1,050 gallon anti-freeze). The control device on the TEG dehydrator is a BTEX eliminator.

## Emissions Summary

<b>Plantwide Emissions Summary [Tons per Year]</b>		
<b>Regulated Pollutants</b>	<b>Potential Emissions</b>	<b>2015 Actual Emissions*</b>
Carbon Monoxide (CO)	14.83	0
Nitrogen Oxides (NO <sub>x</sub> )	120.66	0
Particulate Matter (PM <sub>2.5</sub> )	1.84	0
Particulate Matter (PM <sub>10</sub> )	0	0
Total Particulate Matter (TSP)	1.84	0
Sulfur Dioxide (SO <sub>2</sub> )	0.03	0
Volatile Organic Compounds (VOC)	8.20	0

*PM<sub>10</sub> is a component of TSP.*

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions</b>	<b>2015 Actual Emissions*</b>
Benzene	0.28	0
Ethylbenzene	0.04	0
Toluene	0.13	0
Xylene	0.05	0
Hexane	0.23	0
Formaldehyde	2.11	0

*Some of the above HAPs may be counted as PM or VOCs.*

\* The compressor station did not operate in 2015, resulting in the absence of emissions.

### Title V Program Applicability Basis

This facility has the potential to emit 156.2 TPY of NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Cranberry Pipeline Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

### Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Particulate matter air pollution
	45CSR6	Open burning prohibited.
	45CSR10	Emissions of sulfur oxides
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR permits.

	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. 63, Subpart ZZZZ	RICE
	40 C.F.R. 64	Compliance Assurance Monitoring
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR17	Particulate Fugitive.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

**Active Permits/Consent Orders**

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2694E	December 3, 2015	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

**Determinations and Justifications**

- 1) Emission Units Table 1.1 and Section 4.0 – the 440 HP 1967 Clark Compressor engine (2S) was permitted to be replaced by the 1,100 HP White Superior Compressor engine in 2013 (R13-2694C and R30-07900046-2012 SM01). This equipment change did not take place and Cranberry Pipeline Corp. requested through R13-2694D and R13-2694E that conditions for the White Superior Compressor engine be replaced with conditions for the Clark Compressor engine. Therefore, the Table and Section 4.0 permit requirements were revised in accordance with the latest permit R13-2694E to address the changes.
- 2) Requirement 4.3.2 – the Clark compressor engine (2S) was supposed to be tested within 180 days of the engine installation, but it was not tested since the facility has not been in operation since May 4, 2014.
- 3) Section 5.0 - 40 C.F.R. 63 Subpart ZZZZ requirements for the 440 HP 1967 Clark Compressor engine (2S) were added as the engine falls under the category “existing non-emergency 2SLB compressor engine at an area source of HAP emissions”. Also, 40 C.F.R. 63 Subpart ZZZZ requirements for the 880 HP Compressor Engine (1S) were moved from the Facility-Wide Requirements Section 3.0 (conditions 3.1.11, 3.2.1, 3.4.4, 3.5.10 and 3.5.11) to Section 5.0.

**Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. Old requirement 4.3.2 – the Cooper compressor engine (1S) was tested on November 5, 2013 to demonstrate compliance with CO and NOx emission limits (requirement 4.1.1). Since the engine was tested and compliance was demonstrated, this requirement is left out of this permit as obsolete.
2. These non-applicable requirements are included with the Permit Shield (condition 3.7.2):

45CSR14	Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration. This facility’s potential emissions are below 250 tons per year. Therefore, this rule does not apply.
45CSR19	Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution Which Cause or Contribute to Nonattainment. This facility is in an attainment area.
45CSR27	To Prevent and Control the Emissions of Toxic Air Pollutants. Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”
40 C.F.R. 60 Subpart GG	Standards of Performance for Stationary Gas Turbines. There are no turbines at the Heizer Compressor Station.
40 C.F.R. 60 Subpart Dc	The reboiler at this facility is below 10 million BTU/hr, thus this subpart does not apply per 40 C.F.R. § 60.40c.
40 C.F.R. 60 Subpart K	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. All tanks are below 40,000 gallons in capacity.
40 C.F.R. 60 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. All tanks storing volatile organic liquids are below 75 m <sup>3</sup> in capacity.
40 C.F.R. 60 Subpart KKK	Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants. Heizer station is not engaged in the extraction of natural gas from field gas or in the fractionation of mixed natural gas liquids to natural gas products.
40 C.F.R. 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO <sub>2</sub> Emissions. There are no sweetening units at the Heizer station.
40 C.F.R. 60 Subpart KKKK	Standards of Performance for Stationary Combustion Turbines. There are no turbines at the Heizer Compressor Station.
40 CFR 63 Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. This facility is a transmission facility, therefore this subpart does not apply.
40 CFR 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. This facility is not a major source of HAPs, therefore there are no applicable requirements from this subpart.
40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. This facility is not a major source of HAPs, therefore this subpart does not apply to this facility according to 40 C.F.R. § 63.7485.

3. 40 C.F.R. Part 64 - CAM has been addressed in previous permitting actions (included under requirements 4.2.5-4.2.11, 4.4.4-4.4.7 and 4.5.1), and no additional CAM requirements are necessary.

**Request for Variances or Alternatives**

None.

**Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: October 25, 2016  
Ending Date: November 28, 2016

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Natalya V. Chertkovsky-Veselova  
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Division of Air Quality  
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Charleston, WV 25304  
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natalya.v.chertkovsky@wv.gov

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

Not applicable.