West Virginia Department of Environmental Protection Division of Air Quality

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on February 13, 2019.

Permit Number: R30-03900044-2019
Application Received: April 17, 2020
Plant Identification Number: 039-00044
Permittee: Cranberry Pipeline Corporation
Facility Name: Staten Run Compressor Station
Mailing Address: 102 3rd Street; Glasgow, WV 25086

Permit Action Number: MM01 Revised: July 14, 2020

Physical Location: Montgomery, Kanawha County, West Virginia

UTM Coordinates: 471.75 km Easting • 4226.49 km Northing • Zone 17

Directions: Travel approximately 1.25 miles west of Smithers on U.S. Route 60 and

the facility will be located on the right-hand side of the road.

Facility Description

Staten Run Compressor Station is a natural gas production facility covered by Standard Industrial Classification (SIC) Code 1311. The station has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The station consists of one (1) TEG dehydrator, one (1) dehydrator reboiler, two (2) 412 HP natural gas compressor engines, one (1) 375 HP natural gas compressor engine, one (1) 115 HP natural gas compressor engine, one (1) 60 HP natural gas emergency generator, and five (5) storage tanks of various sizes.

Jamie Jarrett, of DAQ's Compliance and Enforcement Section, conducted an inspection last year and identified an emergency generator that was not listed as an emission unit within the site's Title V permit. As a result, this modification is to include the existing grandfathered generator (Emission Point ID-001-G1) to the permit as an after the fact addition that is not subject to Rule 13. The engine is a 300 CI Ford straight six cylinder, 4SRB fueled by natural gas. The generator is a 45 kW Onan rated for 60 HP when running at

generator RPMs of 1800. It was manufactured in 1974 and is thought to have been installed when the station was initially built in 1975.

Emissions Summary

The change in potential emissions associated with the minor modification (MM01) is as follows:

Pollutants	Change in Potential Emissions, TPY
NO_X	+0.33
СО	+0.54
VOC	+0.04

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 180.60 TPY of NO_x . 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State: 45CSR30 Operating permit requirement.

45CSR34 Emission Standards for HAPs

40 C.F.R. Part 63, Subpart ZZZZ RICE MACT

State Only: None

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

The active permits/consent orders affected by this modification are as follows:

Permit or	Date of	Permit Determinations or Amendments That
Consent Order Number	Issuance	Affect the Permit (if any)
N/A		

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

This minor modification is to include the existing grandfathered generator in the permit as an after the fact addition that is not subject to Rule 13. This generator (Emission Point ID-001-G1) is an existing, spark ignition, emergency reciprocating internal combustion engine (RICE), \leq 500HP, located at an area source of HAPs. Therefore, the engine will be subject to 40CFR63 Subpart ZZZZ work practice standards for emergency units. Emergency Generator 001-G1 was added to the Emission Units Table and applicable requirements were included in Section 7.0 of this permit. The applicable requirements for this engine are summarized below:

Condition Number	Summary of Permit Condition	Regulatory Citation
7.1.1.	Operating limitations	45CSR34; 40 C.F.R. §§63.6603(a) and 63.6625(h); Table 2d of 40CFR63, Subpart ZZZZ
7.1.2.	Operate according to emission related instructions or develop maintenance plan	45CSR34; 40CFR§63.6625(e)
7.1.3.	Oil analysis program option	45CSR34; 40CFR§63.6625(j)
7.1.4.	Compliance requirements	45CSR34; 40CFR§63.6605
7.1.5.	General provisions from 40CFR63	45CSR34; 40CFR§§63.6645(a)(5) and 63.6665
7.1.6.	Continuous compliance	45CSR34; 40CFR§63.6640(a); Table 6 of 40CFR63, Subpart ZZZZ
7.1.7.	001-G1 must have a non-resettable hour meter installed	45CSR34; 40CFR§63.6625(f)
7.1.8.	Emergency engine provisions for 001-G1	45CSR34; 40CFR§§63.6640(f), (f)(1), (f)(2), and (f)(4)
7.4.1.	Records for continuous compliance and maintenance	45CSR34;40CFR§§63.6655(d), (e), (f), and (f)(2)
7.5.1.	Report when the permittee did not meet the requirements in Table 8 of 40CFR63, Subpart ZZZZ	45CSR34; 40CFR§63.6640(e)

Non-Applicability Determinations

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

None

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: N/A
Ending Date: N/A

Point of Contact

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

Beena Modi West Virginia Department of Environmental Protection Division of Air Quality 601 57th Street SE Charleston, WV 25304

Phone: 304/926-0499 ext. 41283 • Fax: 304/926-0478

Beena.j.modi@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.