

Fact Sheet



***For Draft/Proposed Renewal Permitting Action Under 45CSR30 and
Title V of the Clean Air Act***

Permit Number: **R30-03900044-2024**
Application Received: **August 11, 2023**
Plant Identification Number: **03-54-039-00044**
Permittee: **Cranberry Pipeline Corporation**
Facility Name: **Staten Run Compressor Station**
Mailing Address: **101 McQuiston Drive, Jackson Center, PA 16133**

Physical Location: Montgomery, Kanawha County, West Virginia
UTM Coordinates: 471.779 km Easting • 4226.742 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) 145 HP natural gas compressor engine, one (1) 60 HP natural gas emergency generator, and five (5) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2023 Actual Emissions
Carbon Monoxide (CO)	14.3	7.22
Nitrogen Oxides (NO _x)	218.43	108.97
Particulate Matter (PM _{2.5})	1.22	0.66
Particulate Matter (PM ₁₀)	1.22	0.66
Total Particulate Matter (TSP)	1.22	0.66
Sulfur Dioxide (SO ₂)	0.03	0.02
Volatile Organic Compounds (VOC)	30.87	7.61

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2023 Actual Emissions
Benzene	0.59	0.07
Toluene	0.97	0.06
Ethylbenzene	0.03	< 0.01
Xylene	0.63	0.03
n-Hexane	1.11	0.13
Formaldehyde (HCHO)	1.53	0.79
Other HAPs	0.53	0.26
Total HAPs	5.39	1.35

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

Title V Program Applicability Basis

This facility has the potential to emit 218.43 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.

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

Federal and State:	45CSR2	Indirect Heat Exchangers
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	NSR permit

WV Code § 22-5-4 (a) (14) 45CSR30 45CSR34 40 C.F.R. Part 61 40 C.F.R. Part 63, Subpart HH 40 C.F.R. Part 63, Subpart ZZZZ 40 C.F.R. Part 64 40 C.F.R. Part 82, Subpart F	The Secretary can request any pertinent information such as annual emission inventory reporting. Operating permit requirement. HAP emission standards Asbestos inspection and removal Oil and Natural Gas Production NESHAP RICE MACT CAM Ozone depleting substances
State Only:	45CSR4 No objectionable odors.

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>)
R13-2863C	November 9, 2022	

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

There were some boilerplate revisions made to the latest revision of the permit (significant modification SM01 issued on 02/06/2023). Also, consent order CO-R13,30-E-2018-03 was closed on June 5, 2018 (according to the J. F. Jarrett Memo dated 11/27/2018), therefore it is no longer listed in the Fact Sheet Section "Active Permits/Consent Orders" above. Also, the following changes took place:

1. Emission Units Table 1.1 –Cooper Bessemer GMX-A6 375 hp Reciprocating Compressor Engine (Emission Unit ID #3) was removed from the table, because the engine was replaced by the Caterpillar G3306 NA 145 hp Compressor Engine (Emission Unit ID #5).
2. Section 7.0 - Emission Unit ID #3 (Emission Point ID 001-05) was removed from this section.
3. Section 11.0 (Facility-Wide Fugitive Emissions) – removed from the permit because the facility no longer conducts LDAR monitoring voluntarily. Under 40 CFR §60.5365a(j), the collection of fugitive emissions at a compressor station that commences modification, after September 18, 2015, and on or before December 6, 2022 is an affected source. Under this subpart, a modification occurs when an additional compressor is installed, or one or more compressors are replaced by one or more compressors of greater total horsepower than the compressor(s) being replaced. During the review for R30-03900044-2019 (SM01), the LDAR requirements from 40 CFR 60 Subpart OOOOa were initially included, but it was discovered that the replacement compressor was a screw type which is not an affected facility under Subpart OOOOa, however, the company agreed to leave the LDAR requirements in the permit until further guidance could be obtained from EPA. The citation of authority for

Section 11.0 was 45CSR§30-12.7. The company has since determined that since the Caterpillar G3306 NA 145 hp Compressor Engine (Emission Unit ID #5) installed during SM01 was a replacement for older 115 hp Compressor Engine (Emission Unit ID #4), as well as for older 375 hp Compressor Engine (Emission Unit ID #3), and total horsepower was actually never increased, this was not a modification which could have triggered the LDAR requirements under 40 CFR §60.5365a(j).

Non-Applicability Determinations

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

- a. 40 CFR 60 Subpart Dc – Standards of Performance for Steam Generating Units: The reboiler at this facility is less than 10 mmBtu/hr; hence Subpart Dc is not applicable in accordance with 40CFR§60.40c(a).
- b. 40 CFR 60 Subparts K, Ka – Standards of Performance for Storage Vessels for Petroleum Liquids: All tanks at the facility are below 40,000 gallons in capacity and are not subject as specified in 40CFR§§60.110(a) and 60.110a(a).
- c. 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels: All tanks at the facility are below 75m³ (19,813 gallons) in capacity and are not subject as specified in 40CFR§60.110b(a).
- d. 40 CFR 60 Subpart KKK – Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants: This compressor station is not engaged in the extraction or fractionation of natural gas liquids from field gas, the fractionation of mixed natural gas liquids to natural gas products, or both.
- e. 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines: There are no compression ignition engines at this facility.
- f. 40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines: All engines at the facility were constructed, reconstructed, or modified prior to the June 12, 2006 applicability date listed in 40CFR§60.4230(a)(4).
- g. 40 CFR 60 Subpart OOOO – Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification, or Reconstruction Commenced after August 23, 2011 and on or before September 18, 2015: Storage Vessel requirements for pipeline liquids tanks T03, T05, & T06 were found not to be applicable because potential emissions are well below 6 tpy of VOC in accordance with 40CFR§60.5365(e). No other affected sources were identified at this site.
- h. 40 CFR 60 Subpart OOOOa – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 and on or before December 6, 2022. The GHG and VOC requirements defined by this NSPS are not applicable to this site because there were no affected sources that commenced construction, modification, or relocation after September 18, 2015 and on or before December 6, 2022 in accordance with 40CFR§60.5365a.
- i. 40 CFR 63 Subpart HHH – National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities: This rule does not apply because this facility is not a natural gas transmission or storage facility transporting or storing natural gas prior to local distribution and is not a major source of HAP emissions, as specified in §63.1270(a).

- j. 40 C.F.R. 63 Subpart DDDDD – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters: This subpart does not apply to the facility since it is not a major source of HAPs as defined in 40CFR§63.7575.
- k. 40 C.F.R. 63 Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources: This subpart does not apply to the facility since the reboiler is fueled by natural gas as defined in 40CFR§63.11195(e).

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: June 11, 2024

Ending Date: July 11, 2024

Point of Contact

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

Natalya V. Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41250
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.