West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

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

Permit Number: R30-00500020-2017
Application Received: June 27, 2016
Plant Identification Number: 03-54-00500020
Permittee: Cranberry Pipeline Corporation
Facility Name: Danville Station
Mailing Address: Suite 401, Five Penn Center West
Pittsburgh, PA 15276-0120

Revised: May 3, 2017

Physical Location: Danville, Boone County, West Virginia
UTM Coordinates: 422.07 km Easting • 4,214.25 km Northing • Zone 17
Directions: Travel south on US-119 toward Madison. Bear left onto CR-7/03 (Left Fork) for approximately 2.4 miles. Turn left on CR-119/07 (Lick Creek) for approximately 0.9 miles to the station entrance.

Facility Description
Danville 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 with flare, one (1) dehydrator reboiler, three (3) 400 HP natural gas compressor engines, one (1) 800 HP natural gas compressor engine, two (2) 810 HP natural gas compressor engines, one (1) 155 hp emergency generator and two (2) storage tanks.
### Emissions Summary

#### Plantwide Emissions Summary [Tons per Year]

<table>
<thead>
<tr>
<th>Regulated Pollutants</th>
<th>Potential Emissions</th>
<th>2015 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>32.37</td>
<td>24.84</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO\textsubscript{x})</td>
<td>233.67</td>
<td>229.6</td>
</tr>
<tr>
<td>Particulate Matter (PM\textsubscript{2.5})</td>
<td>3.13</td>
<td>0.75</td>
</tr>
<tr>
<td>Particulate Matter (PM\textsubscript{10})</td>
<td>3.13</td>
<td>1.56</td>
</tr>
<tr>
<td>Total Particulate Matter (TSP)</td>
<td>3.65</td>
<td>3.55</td>
</tr>
<tr>
<td>Sulfur Dioxide (SO\textsubscript{2})</td>
<td>0.23</td>
<td>0.07</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>16.65</td>
<td>15.5</td>
</tr>
</tbody>
</table>

*PM\textsubscript{10} is a component of TSP.*

#### Hazardous Air Pollutants

<table>
<thead>
<tr>
<th>Hazardous Air Pollutants</th>
<th>Potential Emissions</th>
<th>2015 Actual Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benzene</td>
<td>0.21</td>
<td>0.18</td>
</tr>
<tr>
<td>Ethylbenzene</td>
<td>0.05</td>
<td>0.02</td>
</tr>
<tr>
<td>Toluene</td>
<td>0.15</td>
<td>0.13</td>
</tr>
<tr>
<td>Xylene</td>
<td>0.09</td>
<td>0.06</td>
</tr>
<tr>
<td>Hexane</td>
<td>0.14</td>
<td>0.14</td>
</tr>
<tr>
<td>Formaldehyde</td>
<td>6.32</td>
<td>6.15</td>
</tr>
<tr>
<td>Total HAP</td>
<td>9.33</td>
<td>6.69</td>
</tr>
</tbody>
</table>

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

### Title V Program Applicability Basis

This facility has the potential to emit 233.67 tons per year of Nitrogen Oxide. 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: Construction Permit
- 45CSR16: New stationary sources.
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 Hazardous Air Pollutants for Source Categories Pursuant to 40 CFR, Part 63
40 C.F.R. Part 60, Subpart JJJJ Stationary spark ignition IC engines.
40 C.F.R § 60.18 NSPS Flare requirements
40 C.F.R. Part 61 Asbestos inspection and removal
40 C.F.R. Part 63, Subpart ZZZZ RICE MACT
40 C.F.R. Part 63, Subpart HH Oil and Natural Gas Production Facilities MACT
40 C.F.R. Part 82, Subpart F Ozone depleting substances
State Only: 45CSR4 No objectionable odors.
45CSR17 Control fugitive particulate matter

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

<table>
<thead>
<tr>
<th>Permit or Consent Order Number</th>
<th>Date of Issuance</th>
<th>Permit Determinations or Amendments That Affect the Permit (if any)</th>
</tr>
</thead>
<tbody>
<tr>
<td>R13-2585D</td>
<td>July 2, 2014</td>
<td></td>
</tr>
</tbody>
</table>

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

None

Non-Applicability Determinations

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

40 CFR 64 (CAM Rule) – The dehy unit (Dehy) is not subject to CAM since the unit is subject to 40 C.F.R. 63 Subpart HH, which has provisions for compliance monitoring established after 1990 (exemption per 40 C.F.R. §64.2(b)(1)(i)). In addition, since the R13-2585D permit specifies a "continuous compliance determination method" (e.g. continuously monitoring the flare using a thermocouple to detect the presence of a flame) which was included in the Title V permit, CAM does not apply (exemption per 40 C.F.R. §64.2(b)(1)(vi)). The compressor engines CE-5 and CE-6 are subject to 40 C.F.R 63 Subpart ZZZZ and the
emergency generator EG-1 is subject to 40 C.F.R 60 Subpart JJJJ which have provisions for compliance monitoring established after 1990(exemption per 40 C.F.R. §64.2(b)(1)(i)).

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: Wednesday, March 29, 2017
Ending Date: Friday, April 28, 2017

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. 1228  •  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)
A comment was received from Paul Wentworth of US EPA Region III on May 1, 2017 regarding the Draft/Proposed Permit for Cranberry Pipeline Corporation, Danville Station, R30-00500020-2017. The following is EPA’s comment with the DAQ’s response:

Condition 4.2.1

EPA Comment: The language in this section should contain the frequency of the inspection of the catalytic oxidizer.

DAQ Response: Section 4.0 contains the R13-2585D requirements for engines CE-5 and CE-6. Section 11 contains the RICE MACT requirements for these same engines CE-5 and CE-6. Although 4.2.1 does not specify the frequency of inspections of the catalytic oxidizers, Section 11 requires annual testing to demonstrate compliance with emission limits and either the installation of a CPMS to continuously monitor catalyst inlet temperature or equipment to automatically shut down the engine if the catalyst inlet temperature exceeds 1350 °F. The annual testing and monitoring required under Section 11 will demonstrate proper maintenance of the catalytic oxidizers described under Condition 4.2.1. Therefore, no changes were made in the condition 4.2.1 of this permit.