West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

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

Permit Number: **R30-01700027-2016**
Application Received: **December 11, 2015**
Plant Identification Number: **017-00027**
Permittee: **EQM Gathering Opco, LLC**
Facility Name: **Saturn Compressor Station**
Mailing Address: **625 Liberty Avenue, Suite 1700, Pittsburgh, PA 15222**

Revised: NA

Physical Location:	Central Station, Doddridge County, West Virginia
UTM Coordinates:	515.528 km Easting • 4,349.752 km Northing • Zone 17
Directions:	From Parkersburg, WV take US-50 East for approximately 42 miles. Turn left onto Willhelm Run Road and continue onto Stone Valley Road for approximately 2.0 miles. Take a sharp left into the entrance to the station.

Facility Description

The Saturn Compressor Station is an existing natural gas gathering facility covered by Standard Industrial Classification (SIC) 1311. Natural gas and liquids (mostly produced water) from nearby wells undergo compression and dehydration before it is transported to a gas gathering line for additional processing. The station consists of a total of seven (7) natural gas fired reciprocating engines, three (3) triethylene glycol (TEG) dehydration units each controlled with a thermal oxidizer, three (3) dehydrator reboilers, five (5) natural gas fired microturbines for generating electricity, four (4) produced fluid tanks controlled with one (1) thermal oxidizer, five (5) fuel gas heaters and other miscellaneous storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]

Regulated Pollutants	Potential Emissions	2015 Actual Emissions
Carbon Monoxide (CO)	62.08	10.72
Nitrogen Oxides (NO_X)	125.67	52.27
Particulate Matter ($PM_{2.5}$)	8.94	0.35
Particulate Matter (PM_{10})	8.94	0.35
Total Particulate Matter (TSP)	8.94	4.62
Sulfur Dioxide (SO_2)	0.71	0.42
Volatile Organic Compounds (VOC)	136.82	56.02

PM_{10} is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2015 Actual Emissions
Formaldehyde (HCHO)	11.86	11.20
Total HAPs	32.64	22.93

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

Title V Program Applicability Basis

This facility has the potential to emit 126 tpy of NO_x, 137 tpy of VOC, 12 tpy of formaldehyde and 33 tpy of total HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP and over 25 tons per year of aggregate HAPs, EQM Gathering Opco, LLC's Saturn Compressor Station 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	To Prevent And Control Particulate Air Pollution From Combustion Of Fuel In Indirect Heat Exchangers
45CSR6	Control Of Air Pollution From Combustion Of Refuse.
45CSR11	Standby Plans For Emergency Episodes.
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR16	Standards Of Performance For 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
40 C.F.R. Part 60, Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
40 C.F.R. Part 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
40 C.F.R. Part 61	Asbestos inspection and removal
40 C.F.R. Part 63, Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities
40 C.F.R. Part 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	
45CSR4	No objectionable odors.
45CSR17	To Prevent And Control Particulate Matter Air Pollution From Materials Handling, Preparation, Storage And Other Sources Of 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

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit *(if any)*
R13-3150	March 5, 2014	

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. **45CSR2 -** ***To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers.***

   45CSR2 applies to fuel burning units, defined as equipment burning fuel "for the primary purpose of producing heat or power by indirect heat transfer". The reboilers, stabilizer heaters and fuel gas heaters are fuel burning units each with a design heat input under 10 million BTU/hr. Section 11.1 states that any fuel burning unit(s) having a heat input under ten (10) million B.T.U's per hour will be exempt from sections 4, 5, 6, 8 and 9. The reboilers, stabilizer heaters and fuel gas heaters are

subject to the 10 percent opacity limits required by section 3.1 of this rule. Compliance with the visible emission requirements shall be determined in accordance with 40 C.F.R. Part 60, Appendix A, Method 9 at the request of the Director.

2. 45CSR6 - *Control Of Air Pollution From Combustion Of Refuse*.

This rule establishes emission standards for particulate matter and requirements for activities involving incineration of refuse.

The facility has (4) four thermal oxidizers (TO-1, TO-2, TO-3 and TO-4) that are subject to the emission standards for particulate matter and opacity requirements set forth in section 4 of this rule. The opacity from these units shall not exceed 20 percent, except as provided by 4.4. The allowable hourly particulate matter emissions are calculated using the following formula (Section 4.1):

Emissions (lb/hr) = F x Incinerator Capacity (tons/hr)

Where, the factor, F, is as indicated in Table I below:

Table I: Factor, F, for Determining Maximum Allowable Particulate Emissions.

Incinerator Capacity	Factor F
A. Less than 15,000 lbs/hr	5.43
B. 15,000 lbs/hr or greater	2.72

The allowable Particulate Emissions from TO-1, TO-2, TO-3 and TO-4 are as follows:

Emission Unit ID	Maximum Fuel Capacity (Waste Gas & Natural Gas) (scf/hr)	Feed to Incinerator (ton/hr)	Allowable Hourly PM Emissions (lb/hr)
TO-1	2,200	0.062	0.34
TO-2	2,200	0.062	0.34
TO-3	2,200	0.062	0.34
TO-4	24,900	0.70	3.8

Note: Natural Gas Density is based on 0.056 lb/ft^3

The R13-3150 PM permit limit for TO-1, TO-2 and TO-3 is 0.02 lb/hr each. Therefore, the Rule 6 allowable limits will be streamlined with the Rule 13 permit limits.

The facility will demonstrate compliance with this rule by monitoring the amount of waste gas combusted in the thermal oxidizers and by conducting monthly Method 22 visual emission checks of the thermal oxidizers.

3. 45CSR13 - *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation*

Permit R13-3150 was issued on March 5, 2014 for the installation of two (2) natural gas fired compressor engines, one (1) dehydration unit with associated reboiler and a thermal oxidizer, two (2) produced fluids tanks, one (1) fuel gas heater, five (5) natural gas fired microturbines, and one (1) pipeline flare. The permit also incorporated the existing equipment at the facility.

The applicable requirements of Permit R13-3150 have been incorporated into the Title V permit. Due to the format of the permit and the verbatim incorporation of language from the federal

regulations, the permit contains language not applicable to the Saturn Compressor Station. Therefore, these non-applicable requirements have not been included in the Title V permit. Also, the requirements that pertained to initial notifications, reporting and or testing have been satisfied and therefore not included in the Title V permit. The following conditions of R13-3150 have not been included in the Title V permit: 6.1.1., 6.1.2., 6.3.1. - 6.3.5., 6.4.2., 6.6.1.c., 7.1.1., 7.1.2., 7.5.1., 7.5.3., 7.5.4., 7.5.11. - 7.5.13., 7.6.1., 7.7.2., 7.8.6., 7.9.2., 7.9.3., 7.9.4., 7.10.4., 8.2.1., 8.4.1., 10.3.1., 10.4.5., 13.3.1. and 13.4.4.

Stabilizer heaters "HTR-1" and "HTR-2" have been retired. But since they are contained in R13-3150, the requirements for these heaters have been included in the Title V permit.

Condition 7.6.4. contains language regarding an operating limitation requiring the use of a temperature measuring device taken from 40 CFR §63.6625(k) of Subpart ZZZZ. The revised version of Subpart ZZZZ no longer contains §63.6625(k). Therefore, this permit condition has not been included in the Title V permit

Condition 8.3.2. contains "affirmative defense" language taken from 40 CFR 60 Subpart OOOO. The revised version of Subpart OOOO no longer contains this language. Therefore, these permit conditions have not been included in the Title V permit.

R13-3150 contains requirements from 40 CFR 60 Subpart OOOO in Section 14 for pneumatic controllers. All of the pneumatic controllers at the Saturn station are air driven and therefore not subject to Subpart OOOO. Hence, the requirements of Section 14 in R13-3150 have not been included in the Title V permit. *(see Item 7.d. below)*

R13-3150 also contained requirements from the boiler MACT 40 CFR 63 Subpart DDDDD in Section 12.0. It has been determined that the facility is not a major source of HAPs in accordance with the definition of a major source in this Subpart. Therefore, the boiler MACT requirements have not been included in the Title V permit. See discussion below for Subpart DDDDD under the "Non-Applicability Determinations" section of this fact sheet.

4. 45CSR16 - *Standard of Performance for New Stationary Sources*

This rule establishes and adopts standards of performance for new stationary sources promulgated by the U.S. EPA pursuant to section 111(b) of the federal Clean Air Act, as amended.

The facility is subject to 40 CFR 60 Subpart JJJJ and Subpart OOOO. See below.

5. 45CSR34 - *Emission Standards for Hazardous Air Pollutants*

This rule establishes and adopts a program of national emission standards for hazardous air pollutants and other regulatory requirements promulgated by the U.S. EPA pursuant to 40 CFR Part 61, 63 and section 112 of the federal Clean Air Act, as amended.

The facility is subject to 40 CFR 63 Subpart ZZZZ and Subpart HH. See below.

6. 40CFR60 Subpart JJJJ - *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*

The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary spark ignition (SI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (6) of 40 CFR §60.4230. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

Engines CE001, CE002, CE003, CE004, and CE006 are Caterpillar G3608 Compressor Engines that are 4-stroke, lean burn, spark ignition RICE, manufactured after July 1, 2007. They are non-emergency engines rated at 2,370 HP each and are fueled by natural gas. Engines CE007, CE008, are Caterpillar G3616 Compressor Engines that are 4-stroke, lean burn, spark ignition RICE, manufactured after July 1, 2007. They are non-emergency engines rated at 4,735 HP each and are fueled by natural gas. All of the engines are equipped with oxidation catalysts which are guaranteed by the manufacturer to achieve a 93% reduction in CO emissions, 83% reduction in formaldehyde emissions, and a 50% reduction in VOC emissions. The engines must meet the emissions limits of 40 CFR §60.4233(e). The engines will demonstrate compliance with the emission standards set forth in this Subpart JJJJ with the installed catalyst.

EQM will demonstrate compliance with this subpart for the non-certified engines in accordance with §60.4243(b)(2)(ii), which requires the facility to keep a maintenance plan and records of conducted maintenance and to maintain and operate the engines in a manner consistent with good air pollution control practices for minimizing emissions. Additionally, EQM has conducted the initial performance tests and is required to conduct subsequent compliance testing every 8,760 hours or three years, whichever comes first to demonstrate compliance with the emissions standards, testing will be conducted in accordance with §60.4244.

Records of all notifications submitted to comply with this subpart, maintenance conducted on the engines, and performance testing will be maintained in accordance with §60.4245(a). Initial notifications have been submitted. Performance testing results will be reported as required in §60.4245(d).

7. 40CFR60 Subpart OOOO - *Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution*

40 CFR 60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO_2) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011 and on or before September 18, 2015. The following affected sources which commence construction, modification or reconstruction after August 23, 2011 and on or before September 18, 2015 are subject to the applicable provisions of this subpart:

a. Each gas well affected facility, which is a single natural gas well.

There are no gas wells at this facility. Therefore, all requirements regarding gas well affected facilities under 40 CFR 60 Subpart OOOO do not apply.

b. Centrifugal compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment.

There are no centrifugal compressors at the Saturn Compressor Station. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOO do not apply.

c. Reciprocating compressors located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment.

There are reciprocating compressors located at the Saturn Compressor Station that were constructed after August 23, 2011 and on or before September 18, 2015. Therefore, the requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOO do apply.

There are no cover and closed vent systems for the reciprocating compressors. The facility will be required to perform the following:

- Replace the reciprocating compressor rod packing at least every 26,000 hours of operation or 36 months.
- Submit the appropriate start up notifications.
- Maintain records of hours of operation since last rod packing replacement, records of the date and time of each rod packing replacement, and records of deviations in cases where the reciprocating compressor was not operated in compliance.

d. Pneumatic Controllers

- *There are pneumatic controllers located at the Saturn Compressor Station. They are all air driven by four (4) electric air compressors located at the site. Since they are not gas driven pneumatic controllers, they are not affected facilities subject to the requirements regarding pneumatic controllers under 40 CFR 60 Subpart OOOO.*

e. Each storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment.

The condensate storage vessels at the site commenced construction after the applicability date and the permittee is required to calculate the VOC emissions from the storage vessels. The produced fluids tanks are not subject to the requirements of this rule because they have the potential to emit less than 6 tpy of VOC from each tank. Each tank has a VOC emission limit of 4.06 tpy.

f. The group of all equipment, except compressors, within a process unit is an affected facility.

- Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.
- Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system, or liquefied natural gas unit is covered by §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart if it is located at an onshore natural gas processing plant. Equipment not located at the onshore natural gas processing plant site is exempt from the provisions of §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart.
- The equipment within a process unit of an affected facility located at onshore natural gas processing plants and described in paragraph (f) of this section are exempt from this subpart if they are subject to and controlled according to subparts VVa, GGG or GGGa of this part.

The Saturn Compressor Station is not a natural gas processing plant. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants do not apply.

g. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.

The Saturn Compressor Station is not a natural gas processing plant nor are there any sweetening units at the Saturn Compressor Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO do not apply.

8. 40CFR63 Subpart HH - *National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities*

This subpart applies to the owners and operators of the emission points, specified in paragraph (b) of 40 CFR §63.760 that are located at oil and natural gas production facilities that meet the specified criteria in paragraphs 40 CFR §§63.760(a)(1) and either (a)(2) or (a)(3) of this section. The Saturn Compressor Station is a facility that processes, upgrades and stores hydrocarbon liquids and meets the criteria in 40 CFR §§63.760(a)(1) and (a)(2).

This regulation applies to facilities that are major or area sources of hazardous air pollutants (HAP) as defined in §63.761 of this subpart. Major source, as used in this subpart, shall have the same meaning as in §63.2, except that, for facilities that are production field facilities, only HAP emissions from glycol dehydration units and storage vessels shall be aggregated for a major source determination. The Saturn Compressor Station is a production field facility that processes gas prior to the point of custody transfer. When taking into consideration HAP emissions only from dehydration units and storage tanks, the site is an area source of HAP emissions for the purpose of this subpart.

The benzene emissions from the existing glycol dehydrator vents are less than 0.90 megagrams per year (1 tpy) each, therefore, the Saturn Compressor Station is exempt from the requirements of 40 CFR §63.764(d) pursuant to 40 CFR §63.764(e)(1)(ii), except for the requirement to keep records of the actual average benzene emissions from the dehydrator, per 40 CFR §63.774(d)(1)(ii). EQM will continue to comply with the requirements of Subpart HH as outlined in the current permit R13-3150.

9. 40CFR63 Subpart ZZZZ - *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

The two CAT G3616 compressor engines (CE007 and CE008) at the Saturn Compressor Station are classified as new spark ignition engines at a major source of HAP because the facility changed from an area source to a major source with the installation of these two new engines. The emission limitations for the engines are included in 40 CFR §63.6600 and Table 2a. The operating limitations are included in Table 2b and the continuous parametric monitoring system requirements included in 40 CFR §63.6625(b). The initial performance demonstration has been completed. The initial notification requirements and the notification of compliance status requirements have been submitted. Semiannual reporting requirements are included in 40 CFR §63.6650. The recordkeeping requirements are included in 40 CFR §§63.6655(a), (b) and (d).

The existing engines (CE001, CE002, CE003, CE004 and CE006) at the facility, per §63.6595(b)(2), stationary RICE for which construction commenced before an area source becomes a major source of HAP, must be in compliance with the provisions that are applicable to RICE located at major sources within 3 years after the area source becomes a major source of HAPs. The compliance date

for the major source RICE requirements for these five engines is December 12, 2017. On that date, these engines will be subject to the same requirements as CE007 and CE008.

Non-Applicability Determinations

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

1. **45 CSR 10 - *To Prevent and Control Air Pollution from the Emission of Sulfur Oxides.***

   This rule potentially applies to fuel burning units, including glycol dehydration unit reboilers and fuel gas heaters. Per 45CSR§10-10.1, units rated less than 10 MMBtu/hr are exempt from the SO_2 emission limitations and testing, monitoring, recordkeeping, and reporting requirements of this rule. The reboilers and fuel gas heaters at the station are each rated less than 10 MMBtu/hr and as such are exempt from this rule.

2. **40 CFR 60 Subparts D, Da, Db, and Dc - *Standards of Performance for Fossil-Fuel-Fired Steam Generators, Electric Utility Steam Generating Units, for Industrial-Commercial-Institutional Steam Generating Units and for Small Industrial-Commercial-Institutional Steam Generating Units.***

   These subparts apply to steam generating units of various sizes, all greater than 10 MMBtu/hr. The station does not include any steam generating units with a heat input greater than 10 MMBtu/hr, therefore the requirements of these subparts do not apply.

3. **40 CFR 60 Subpart GG - *Standards of Performance for Stationary Gas Turbines.***

   Pursuant to 40 CFR §60.330, this subpart is applicable to stationary gas turbines with a heat input at peak load equal to or greater than 10 MMBtu/hr, based on the lower heating value of the fuel fired, which commenced construction, modification, or reconstruction after October 3, 1977. The microturbines at the station have a heat input rating less than 10 MMBtu/hr. Therefore, this subpart is not applicable to the microturbines.

4. **40 CFR 60 Subpart KKKK - *Standards of Performance for Stationary Combustion Turbines.***

   Pursuant to 40 CFR §60.4305, this subpart is applicable to stationary combustion turbines with a heat input at peak load equal to or greater than 10 MMBtu/hr, based on the lower heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005. The microturbines at the station have a heat input rating less than 10 MMBtu/hr. Therefore, this subpart is not applicable to the microturbines.

5. **40 CFR 60 Subparts IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines***

   This subpart applies to manufacturers, owners, and operators of stationary compression ignition internal combustion engines (CI ICE) that have been constructed, reconstructed, or modified after various dates, the earliest of which is July 11, 2005. The compressor engines at the Saturn Compressor Station are spark-ignition internal combustion engines. Therefore, the requirements of this subpart do not apply.

6. **40 CFR 60 Subparts K, Ka, and Kb - *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, for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 and for***

Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

These subparts apply to storage tanks of certain sizes constructed, reconstructed, or modified during various time periods. Subpart K applies to storage tanks constructed, reconstructed, or modified prior to 1978, and Subpart Ka applies to those constructed, reconstructed, or modified prior to 1984. Subpart Kb applies to volatile organic liquid (VOL) storage tanks constructed, reconstructed, or modified after July 23, 1984 with a capacity equal to or greater than 75m^3 (19,813 gallons). The natural gas liquids tanks at the station have a capacity greater than 19,813 gallons. However, these are pressurized vessels that operate without emissions to the atmosphere, and are specifically exempted from the rule under §60.110b(d)(2). The existing and proposed methanol tanks, produced fluids tanks, and other miscellaneous tanks at the Saturn Compressor Station each have capacities less than 19,813 gallons. Therefore, Subparts K, Ka, and Kb do not apply to the storage tanks at the station.

7. 40 CFR §63 Subpart HHH - ***National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities***

The glycol dehydration units are potentially subject to Subpart HHH. This subpart is applicable to such units at natural gas transmission and storage facilities that are major sources of HAP emissions located downstream of the point of custody transfer (after processing and/or treatment in the production sector), but upstream of the distribution sector. The Saturn Station is a gathering station that is not a transmission or storage facility. Therefore, the requirements of this subpart do not apply to the station.

8. 40 CFR §63 Subpart YYYY - ***National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines***

This subpart is applicable to stationary combustion turbines located at a major source of HAP emissions. Pursuant to §63.6090(b)(3), an existing, new, or reconstructed stationary combustion turbine with a rated peak power output of less than 1.0 megawatt (MW) at International Organization for Standardization (ISO) standard day conditions, which is located at a major source, does not have to meet the requirements of this subpart and of subpart A of 40 CFR Part 63. This determination applies to the capacities of individual combustion turbines, whether or not an aggregated group of combustion turbines has a common add-on air pollution control device. No initial notification is necessary, even if the unit appears to be subject to other requirements for initial notification. The microturbines are each rated for 200 KW (0.2 MW). Therefore, the requirements of this subpart do not apply to the station.

9. 40 CFR 63 Subpart DDDDD - ***National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters***

This subpart is applicable to industrial, commercial, and institutional boilers and process heaters of various sizes and fuel types located at major sources of HAP. For purposes of this subpart, a major source of HAP for oil and natural gas production facilities, is as defined in §63.7575. The Saturn Compressor Station is a production field facility and therefore the following definition (§63.7575(3)) is applicable to the station:

Major source for oil and natural gas production facilities, as used in this subpart, shall have the same meaning as in §63.2, except that:

(3) For facilities that are production field facilities, only HAP emissions from glycol dehydration units and storage vessels with the potential for flash emissions shall be aggregated

for a major source determination. For facilities that are not production field facilities, HAP emissions from all HAP emission units shall be aggregated for a major source determination.

The aggregated HAP emissions from the glycol dehydration units and storage vessels with the potential for flash emissions at the station do not trigger the major source threshold. Therefore, the requirements of this subpart do not apply to the station.

10. 40 CFR Part 64 – *Compliance Assurance Monitoring (CAM)*

There are no "*large pollutant-specific emissions units"* at the Saturn Compressor Station. Since this is the initial Title V permit for the facility, CAM is not required to be addressed. Pursuant to §64.5(b), for all "*other pollutant-specific emissions units"* (i.e., units with post-control potential emissions less than the major threshold), the owner or operator shall submit the information required under §64.4 as part of an application for a renewal of the Title V permit. Therefore, CAM for the Saturn station will be addressed accordingly during the facility's first Title V Operating Permit Renewal.

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 14, 2016
Ending Date: November 14, 2016

Point of Contact

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

Frederick Tipane
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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.