

Fact Sheet



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

Permit Number: **R30-03900075-2017**
Application Received: **September 23, 2016**
Plant Identification Number: **039-00075**
Permittee: **Cranberry Pipeline Corporation**
Facility Name: **Horsemill Compressor Station**
Mailing Address: **900 Lee Street East, Suite 1500, Charleston, WV 25301**

Revised: NA

Physical Location: Cedar Grove, Kanawha County, West Virginia
UTM Coordinates: 461.62 km Easting • 4232.35 km Northing • Zone 17
Directions: From U.S. Route 60 in Cedar Grove, take exit to Kelleys Creek. Travel approximately 0.2 of a mile and turn right onto Kelleys Creek Rd. In approximately 250 feet, turn left onto Horsemill Hollow Rd. Travel approximately 1.3 miles. Station is on the left.

Facility Description

Horsemill Compressor Station is a natural gas gathering 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) 600 HP natural gas compressor engine, one (1) 800 HP natural gas compressor engine, a glycol dehydration unit (consisting of a still column and a reboiler) and 3 tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2016 Actual Emissions*
Carbon Monoxide (CO)	24.43	NA
Nitrogen Oxides (NO _x)	202.89	NA
Particulate Matter (PM _{2.5})	0.48	NA
Particulate Matter (PM ₁₀)	0.48	NA
Total Particulate Matter (TSP)	0.48	NA
Sulfur Dioxide (SO ₂)	0.03	NA
Volatile Organic Compounds (VOC)	50.07	NA

PM₁₀ is a component of TSP.

Hazardous Air Pollutants	Potential Emissions	2016 Actual Emissions*
Total HAPs <i>(all individual HAPs are <10 tpy)</i>	13.41	NA

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

*Note: The facility has not operated since December of 2013.

Title V Program Applicability Basis

This facility has the potential to emit 203 tpy of NO_x. Due to this facility's potential to emit over 100 tons per year of a criteria pollutant, Cranberry Pipeline Corporation's Horsemill 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	Open burning prohibited.
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
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
45CSR30	Requirements For Operating Permits.
45CSR34	Emission Standards For Hazardous Air Pollutants.

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 (<i>if any</i>)
R13-2808B	May 10, 2013	

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 is a renewal of the Title V permit which was issued on April 10, 2012 and modified on June 3, 2013. Significant changes to the most recent version of the Title V Permit consist of the following:

- 1) Updated the permittee's mailing address, telephone number and the facility's SIC code.
- 2) Title V Boilerplate changes:
 - Conditions 3.5.3., 3.5.5. and 3.5.6. - These conditions were revised to require electronic submittal of the Title V compliance certifications (annual and semi-annual), self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols to the WV DAQ.
- 3) Emission Units Table Section 1.1 – The following changes have been made to the equipment table:
 - The type of engine (i.e., "4SRB") has been added to the description for the Compressors.
 - The capacity of the "New Engine Oil Storage" tank (006) has been corrected to 2000 gallons.

- The “Waste Fluids Storage” tank (008) has been removed from the site and therefore removed from the table.
- 4) **Conditions 3.1.10 and 3.4.4.** - Moved the minor source of HAP requirements from Section 4 to Conditions 3.1.10. and 3.4.4. The subsequent sections have been renumbered. Section 5 (*Dehydration and Reboiler*) requirements are now in Section 4. Section 6 (*Exemption (Less than 1 ton/year Benzene Exemption Subpart HH)*) requirements are now in Section 5. And Section 7 (*40C.F.R.63, Subpart ZZZZ RICE MACT*) requirements are now in Section 6 with the description for Section 6 being changed to “Compressor Engines #1 and #2.”
- 5) **Condition 3.4.2.** – This condition has been re-written to combine the Title V permit and R13-2808B permit boilerplate language. The requirements from 40 CFR §63.10(b)(1) which are required by 40 CFR §63.6660 have also been added to this condition.
- 6) **Condition 3.7.2.** – The permittee requested a permit shield for several non-applicable regulations. They have been included in this condition of the permit.
- 7) **Condition 4.5.2. (current permit)** – The permittee has requested that this condition be removed given that the permit has requirements for annual sampling and recordkeeping as well as condition 4.5.1. reporting requirements. Since the permit contains sufficient monitoring, recordkeeping, testing and reporting requirements to demonstrate compliance with the Glycol Regeneration Still Vent (RSV-1) emission limits of condition 4.1.2., the reporting requirements in condition 4.5.2. are somewhat redundant. Therefore, this condition has not been included in the renewal permit.
- 8) **Section 6.0** - The permittee has classified the compressor engines as non-emergency “remote” engines. Therefore the 40 CFR 63 Subpart ZZZZ emergency engine requirements in Section 7 of the current permit have been removed and replaced with non-emergency non-black start 4SRB remote stationary RICE requirements in Section 6.0 of the renewal permit.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility based on the determinations set forth below:

- 45CSR10** – *To Prevent and Control Air Pollution from the Emission of Sulfur Oxides:* 45CSR10 is not applicable to the facility’s reboiler because its maximum design heat input (DHI) is less than 10 MMBtu/hr.
- 45CSR21** – *Regulation To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds:* The storage tanks at the station, are below 40,000 gallons in capacity and therefore not subject to 45CSR§21-28 per 45CSR§21-28.1.a.. The compressor station is not engaged in the extraction or fractionation of natural gas and therefore is not defined as a “Natural gas processing plant” per 45CSR§21-29.2.h., hence it is not subject to 45CSR§21-29.
- 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 CFR 60 Subpart Dc** – *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units:* The reboiler is less than 10 mmBtu/hr. Therefore; Subpart Dc is not applicable in accordance with 40 CFR §60.40c(a).

- 40 CFR 60 Subparts K; Ka – *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 K); and After May 18, 1978, and Prior to July 23, 1984 (for Ka)***: All tanks at the facility were constructed in 1986.
- 40 CFR 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 at the facility are below 75 m³ (19,813 gallons) in capacity. Therefore, Subpart Kb is not applicable in accordance with 40 CFR §60.110b(a).
- 40 CFR 60 Subpart KKK – *Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants for Which Construction, Reconstruction, or Modification Commenced After January 20, 1984, and on or Before August 23, 2011***: This compressor station is not a natural gas processing plant and does not have a “process unit” as defined in 40 CFR §60.631.
- 40 CFR 60 Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines***: There are no compression ignition engines at this facility.
- 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 June 12, 2006.
- 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***: There are no affected facilities located at the Horsemill Compressor Station that commenced construction, modification, or reconstruction after August 23, 2011, and on or before September 18, 2015.
- 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***: There are no affected facilities located at the Horsemill Compressor Station that commenced construction, modification, or reconstruction after September 18, 2015.
- 40 CFR 63 Subpart HHH – *National Emission Standards for Hazardous Air Pollutants from Natural gas Transmission and Storage Facilities***: This subpart does not apply to the facility since it is not defined as a major source of HAPs.
- 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 does not apply to the facility since it is not defined as a major source of HAPs.
- 40 CFR 63 Subpart JJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources***: The reboiler (RBV-1) is a gas-fired “process heater” and therefore excluded from the definition of “boiler” pursuant to §63.11237.
- 40 CFR 64 – *Compliance Assurance Monitoring (CAM)***: There are no add-on controls at this facility; therefore, in accordance with 40CFR §64.2(a) CAM is not applicable to this facility.

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: August 4, 2017
Ending Date: September 5, 2017

Point of Contact

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

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1215 • Fax: 304/926-0478
frederick.tipane@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.