



west virginia department of environmental protection

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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-3250		
Plant ID No.:	051-00137		
Applicant:	Williams Ohio Valley Midstream LLC (Williams)		
Facility Name:	Starcovic Compressor Station		
Location:	Cameron, Marshall County		
SIC Code:	1389		
NAICS Code:	213112		
Application Type:	Modification		
Received Date:	May 21, 2015		
Engineer Assigned:	Jerry Williams, P.E.	ID #	<u>051-00137</u>
Fee Amount:	\$3,500.00	Reg	<u>R13-3250</u>
Date Received:	June 16, 2015	Company	<u>WILLIAMS dm</u>
Complete Date:	June 16, 2015	Facility	<u>STARCOVIC</u> Initials <u>dm</u>
Due Date:	September 14, 2015		
Applicant Ad Date:	May 21, 2015		
Newspaper:	Moundsville Daily Echo		
UTM's:	Easting: 535.609 km	Northing:	4,409.279 km
Latitude/Longitude:	39.832766, -80.583850	Zone:	17
Description:	Modification of a natural gas compressor station.		

DESCRIPTION OF PROCESS

The following process description was taken from Permit Application R13-3250:

Williams currently operates the existing Starcovic Compressor Station located off of CR-25, which is approximately 1 mile from Cameron. The facility receives natural gas from local production wells, then compresses and dehydrates the gas for delivery to a gathering pipeline. One (1) natural gas fueled compressor is utilized at the facility. The lean burn engine (CE-01) drives a natural gas compressor to increase the pressure of the natural gas. One (1) triethylene glycol (TEG) dehydrator is used at the facility. The dehydrator is comprised of a

contactor/absorber tower (no vented emissions), a flash tank, and a regenerator/still vent. The TEG dehydrator is used to remove water vapor from the inlet gas stream to meet pipeline specifications. In the dehydration process, the wet gas inlet stream flows through a contactor tower where the gas is contacted with lean glycol. The lean glycol absorbs the water in the gas stream and becomes rich glycol laden with water and trace amounts of hydrocarbons. The rich glycol is then routed to a flash tank where the glycol pressure is reduced to liberate the lighter end hydrocarbons (especially methane). Whenever practical, the lighter end hydrocarbons are routed from the flash tank to the reboiler as fuel, otherwise off gases are vented to the atmosphere. The rich glycol is then sent from the flash tank to the regenerator/still vent where the TEG is heated to drive off the water vapor and any remaining hydrocarbons. Once boiled, the glycol is returned to a lean state and used again in the process. A TEG reboiler is used in the process to supply heat for the TEG regenerator/still vent.

There are tanks at the facility to store various materials, including produced water, lube oil, fresh and spent TEG. All of these tanks, except for the produced water storage tanks, generate insignificant emissions. The produced water tank receives liquids from the dehydrator and inlet separator. Liquids removed through the dehydration process are cooled, condensed and sent to the 210 barrel (bbl) atmospheric storage tank (T01). The inlet separator removes produced liquids (primarily water) and these liquids are also sent to the 210 bbl atmospheric storage tank. A ProMax simulation was completed to determine the presence of flash emissions from the storage tanks. The process simulation showed minimal flash emissions. Additionally, blanket gas may be used on the produced water tank to prevent air from entering the tank and potentially causing an explosion.

Loading of produced water into tanker trucks will occur at the facility.

During routine operation of the facility, the compressor engine will undergo periods of startup and shutdown. Often when the engine is shutdown, the natural gas contained within the compressor and associated piping is vented to the atmosphere. Additionally, there will be other infrequent emissions from various maintenance activities at the facility that are not necessarily associated with compressor blowdowns. These emissions are associated with SSM.

The compressor rod packing and engine crankcase generate emissions from mechanical joints, seals, and rotating surfaces.

During routine operation of the facility there are occasional leaks from process piping components such as valves, flanges, connectors, etc. Leaks from the process piping components results in VOC and HAP emissions to the atmosphere.

The following modifications are part of this application:

- Remove one (1) permitted 400 bhp Ajax DPC-2802LE compressor engine
- Remove one (1) permitted 10 MMscfd TEG dehydrator
- Modify the existing 10 MMscfd TEG dehydrator operating parameters
- Include rod packing and crankcase emissions
- Include light liquid fugitive emissions
- Update extended gas analysis
- Update emission factors

SITE INSPECTION

A site inspection was conducted on June 27, 2012 by Steve Sobotka of the DAQ Enforcement Section. The facility was operating in compliance at that time.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this modification application consist of the emissions from one (1) natural gas fired compressor engine (1E), one (1) TEG dehydrator flash tank/still vent (2E), one (1) TEG dehydrator reboiler (3E), one (1) produced water storage tank (4E), one (1) produced water truck load out (5E), SSM emissions (6E), and rod packing/crankcase leaks (7E). Fugitive emissions for the facility are based on calculation methodologies presented in EPA Protocol for Equipment Leak Emission Estimates. The following table indicates which methodology was used in the emissions determination:

<b>Emission Point ID#</b>	<b>Process Equipment</b>	<b>Calculation Methodology</b>
1E	400 hp Ajax DPC-2802LE Reciprocating Internal Combustion Engine (RICE)	Manufacturer's Data, EPA AP-42 Emission Factors
2E	17.0 MMscfd TEG Dehydrator Flash Tank and Still Vent	GRI-GlyCalc 4.0
3E	0.375 MMBTU/hr TEG Dehydrator Reboiler	EPA AP-42 Emission Factors
4E	210 bbl Produced Water Storage Tank	HYSYS Simulation Software
5E	2,520 bbl/yr Produced Water Truck Loadout	EPA AP-42 Emission Factors
6E	SSM Emissions	Engineering Estimate
7E	Rod Packing/Crankcase Emissions	Engineering Estimate
FUG-G	Piping and Equipment Fugitives - Gas	EPA Protocol for Equipment Leak Emission Estimates
FUG-W	Piping and Equipment Fugitives - Water/Oil	

The total facility PTE for the Starcovic Compressor Station is shown in the following table:

<b>Pollutant</b>	<b>Current Facility Wide PTE (tons/year)</b>	<b>Proposed Facility Wide PTE (tons/year)</b>	<b>PTE Difference (tons/year)</b>
Nitrogen Oxides	15.02	7.90	-7.12
Carbon Monoxide	9.13	4.78	-4.35
Volatile Organic Compounds	26.70	48.43	21.73
Particulate Matter-10	1.28	0.76	-0.52
Sulfur Dioxide	0.02	0.01	-0.01
Formaldehyde	1.45	1.18	-0.27
Total HAPs	5.86	13.27	7.41
Carbon Dioxide Equivalent	NA	5,137	5,137

Maximum detailed controlled point source emissions were calculated by Williams and checked for accuracy by the writer and are summarized in the table on the next page.

**Williams Ohio Valley Midstream, LLC -- Starcovic Compressor Station (R13-3250)**

Emission Point ID#	Source	NO <sub>x</sub>		CO		VOC		PM-10/2.5		SO <sub>2</sub>		Formaldehyde		Total HAPs		CO <sub>2</sub> e ton/year
		lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	
1E	Ajax DPC-2802 LE	1.76	7.72	1.06	4.63	0.97	4.25	0.17	0.75	<0.01	0.01	0.26	1.16	0.35	1.53	2305
2E	TEG Flash Tank/Skull Vent	-	-	-	-	6.58	28.82	-	-	-	-	-	-	2.16	9.46	1558
3E	TEG Reboiler	0.04	0.18	0.03	0.15	<0.01	0.01	<0.01	0.01	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	216
4E	Produced Water Storage Tank	-	-	-	-	0.02	0.07	-	-	-	-	-	-	<0.01	0.02	7
5E	Produced Water Truck Loadout	-	-	-	-	14.39	0.26	-	-	-	-	-	-	3.60	0.06	-
6E	SSM Emissions	-	-	-	-	NA	2.39	-	-	-	-	-	-	NA	0.05	348
7E	Rod Packing/Crankcase	-	-	-	-	0.26	1.16	-	-	-	-	<0.01	0.02	0.01	0.05	196
<b>Total Point Source</b>	<b>Starcovic</b>	<b>1.80</b>	<b>7.90</b>	<b>1.09</b>	<b>4.78</b>	<b>22.22</b>	<b>36.96</b>	<b>0.17</b>	<b>0.76</b>	<b>&lt;0.01</b>	<b>0.01</b>	<b>0.27</b>	<b>1.18</b>	<b>6.12</b>	<b>11.17</b>	<b>4630</b>

FUG-G	Process Piping Fugitives - Gas	-	-	-	-	0.76	3.33	-	-	-	-	-	-	0.01	0.06	446
Fugitive	Process Piping Fugitives - Water/Oil	-	-	-	-	1.86	8.14	-	-	-	-	-	-	0.46	2.04	61
<b>Total Fugitive</b>	<b>Starcovic</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>2.62</b>	<b>11.47</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.47</b>	<b>2.10</b>	<b>507</b>
<b>Total Sitewide</b>	<b>Starcovic</b>	<b>1.80</b>	<b>7.90</b>	<b>1.09</b>	<b>4.78</b>	<b>24.84</b>	<b>48.43</b>	<b>0.17</b>	<b>0.76</b>	<b>&lt;0.01</b>	<b>0.01</b>	<b>0.27</b>	<b>1.18</b>	<b>6.59</b>	<b>13.27</b>	<b>5137</b>

## REGULATORY APPLICABILITY

The following rules apply to the facility:

### **45CSR2 (Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers)**

The purpose of 45CSR2 is to establish emission limitations for smoke and particulate matter which are discharged from fuel burning units. 45CSR2 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 4 (weight emission standard), 5 (control of fugitive particulate matter), 6 (registration), 8 (testing, monitoring, recordkeeping, reporting) and 9 (startups, shutdowns, malfunctions). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

The individual heat input of the proposed reboiler (3E) is below 10 MMBTU/hr. Therefore, this unit is exempt from the aforementioned sections of 45CSR2.

Williams is subject to the opacity requirements in 45CSR2, which is 10% opacity based on a six minute block average.

### **45CSR10 (To Prevent and Control Air Pollution from the Emissions of Sulfur Oxides)**

The purpose of 45CSR10 is to establish emission limitations for sulfur dioxide which are discharged from fuel burning units. 45CSR10 states that any fuel burning unit that has a heat input under ten (10) million B.T.U.'s per hour is exempt from sections 3 (weight emission standard), 6 (registration), 7 (permits), and 8 (testing, monitoring, recordkeeping, reporting). However, failure to attain acceptable air quality in parts of some urban areas may require the mandatory control of these sources at a later date.

The individual heat input of the proposed reboiler (3E) is below 10 MMBTU/hr. Therefore, this unit is exempt from the aforementioned sections of 45CSR10.

### **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)**

45CSR13 applies to this source due to the fact that Williams exceeds the regulatory emission threshold for hazardous air pollutants of 2 lb/hr or 5 ton/year.

Williams paid the appropriate application fee and published the required legal advertisement for a modification permit application.

### **45CSR22 (Air Quality Management Fee Program)**

Williams is not subject to 45CSR30. Williams is required to pay the appropriate annual fees and keep their Certificate to Operate current.

**40CFR60 Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution)**

EPA published in the Federal Register new source performance standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. 40CFR60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO<sub>2</sub>) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The following affected sources which commence construction, modification or reconstruction after August 23, 2011 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 would not apply.*

- b. Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your centrifugal compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

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

- c. Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your reciprocating compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

*There is one (1) reciprocating internal combustion compressor located at the Starcovic Compressor Station. However, the compressor was installed prior to August 23, 2011. Therefore, the requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOO would not apply.*

- d. Pneumatic Controllers

- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh which commenced construction after August 23, 2011, and is located between the wellhead and the point of custody

transfer to the natural gas transmission and storage segment and not located at a natural gas processing plant.

- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller which commenced construction after August 23, 2011, and is located at a natural gas processing plant.

*All pneumatic controllers have natural gas bleed rates less than 6 scfh.*

- 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.

40CFR60 Subpart OOOO defines a storage vessel as a unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. The following are not considered storage vessels:

- Vessels that are skid-mounted or permanently attached to something that is mobile (such as trucks, railcars, barges or ships), and are intended to be located at a site for less than 180 consecutive days. If the source does not keep or are not able to produce records, as required by §60.5420(c)(5)(iv), showing that the vessel has been located at a site for less than 180 consecutive days, the vessel described herein is considered to be a storage vessel since the original vessel was first located at the site.
- Process vessels such as surge control vessels, bottoms receivers or knockout vessels.
- Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere.

This rule requires that the permittee determine the VOC emission rate for each storage vessel affected facility utilizing a generally accepted model or calculation methodology within 30 days of startup, and minimize emissions to the extent practicable during the 30 day period using good engineering practices. For each storage vessel affected facility that emits more than 6 tpy of VOC, the permittee must reduce VOC emissions by 95% or greater within 60 days of startup. The compliance date for applicable storage vessels is October 15, 2013.

*The storage vessel located at the Starcovic Compressor Station have a potential to emit of less than 6 tpy of VOC. Therefore, Williams is not required by this section to reduce VOC emissions by 95%.*

- 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 Starcovic Compressor Station is not a natural gas processing plant. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants would not apply.*

- g. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
- Each sweetening unit that processes natural gas is an affected facility; and
  - Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.
  - Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H<sub>2</sub>S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423(c) but are not required to comply with §§60.5405 through 60.5407 and paragraphs 60.5410(g) and 60.5415(g) of this subpart.
  - Sweetening facilities producing acid gas that is completely reinjected into oil-or-gas-bearing geologic strata or that is otherwise not released to the atmosphere are not subject to §§60.5405 through 60.5407, 60.5410(g), 60.5415(g), and 60.5423 of this subpart.

*There are no sweetening units at the Starcovic Compressor Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO would not apply.*

**40CFR63 Subpart HH** (National Emission Standards for Hazardous Air Pollutants for Oil and Natural Gas Production Facilities)

Subpart HH establishes national emission limitations and operating limitations for HAPs emitted from oil and natural gas production facilities located at major and area sources of HAP emissions. The glycol dehydration unit at the Starcovic Compressor Station is subject to the area source requirements for glycol dehydration units. However, because the facility is an area source of HAP emissions and the actual average benzene emissions from the glycol dehydration unit is below 0.90 megagram per year (1.0 tons/year) it is exempt from all requirements of Subpart HH except to maintain records of actual average flowrate of natural gas to demonstrate a continuous exemption status.

**40CFR63 Subpart ZZZZ** (National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines)

Subpart ZZZZ establishes national emission limitations and operating limitations for HAPs emitted from stationary 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 engine (1E) at the Starcovic Compressor Station is subject to the area source requirements for non-emergency spark ignition engines.

For the 'existing' 400 hp Ajax DPC-2802LE 2SLB compressor engine (CE-01) manufactured in October 2000, Williams is required to minimize idle time during startup (startup not to exceed 30 minutes) and change oil and filter, inspect spark plugs, and inspect/replace as necessary all hoses and belts every 4,320 hours or annually (whichever comes first).

The following rules do not apply to the facility:

**40CFR60 Subpart JJJJ** (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI ICE))

The proposed engine was manufactured prior to the applicability dates in the rule. Therefore, Williams would not be subject to this rule.

**40CFR60 Subpart Dc** (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units)

This rule applies to steam generating units with a heat input capacity of 100 MMBTU/hr or less, but greater than or equal to 10 MMBTU/hr for which construction commenced after June 9, 1989. Williams does not have an applicable unit, therefore, Williams would not be subject to this rule.

**40CFR60 Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels)**

40CFR60 Subpart Kb does not apply to storage vessels with a capacity less than 75 cubic meters. The largest tank that Williams has proposed to install is 33.39 cubic meters each. Therefore, Williams would not be subject to this rule.

**40CFR60 Subpart KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants)**

40CFR60 Subpart KKK applies to onshore natural gas processing plants that commenced construction after January 20, 1984, and on or before August 23, 2011. The Starcovic Compressor Station is not a natural gas processing facility, therefore, Williams is not subject to this rule.

**45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants)**

**45CSR19 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment)**

On September 30, 2013, EPA approved a redesignation request and State Implementation Plan (SIP) revision submitted by the State of West Virginia. The West Virginia Department of Environmental Protection (WVDEP) requested that the West Virginia portion of the Wheeling, WV–OH fine particulate matter (PM<sub>2.5</sub>) nonattainment area (“Wheeling Area” or “Area”) be redesignated as attainment for the 1997 annual PM<sub>2.5</sub> national ambient air quality standard (NAAQS).

The Starcovic Compressor Station is located in Marshall County, which is located in this metropolitan statistical area and is an attainment county for all pollutants. Therefore the Starcovic Compressor Station is not subject to 45CSR19.

As shown in the following table, Williams is not subject to 45CSR14 or 45CSR19 review. According to 45CSR14 Section 2.43.e, fugitive emissions are not included in the major source determination because it is not listed as one of the source categories in Table 1. Therefore, the fugitive emissions are not included in the PTE below.

<b>Pollutant</b>	<b>PSD (45CSR14) Threshold (tpy)</b>	<b>NANSR (45CSR19) Threshold (tpy)</b>	<b>Starcovic PTE (tpy)</b>	<b>45CSR14 or 45CSR19 Review Required?</b>
Carbon Monoxide	250	NA	4.78	No
Nitrogen Oxides	250	NA	7.90	No
Sulfur Dioxide	250	NA	0.01	No
Particulate Matter 10	250	NA	0.76	No
Ozone (VOC)	250	NA	36.96	No

## TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

The majority of non-criteria regulated pollutants fall under the definition of HAPs which, with some revision since, were 188 compounds identified under Section 112(b) of the Clean Air Act (CAA) as pollutants or groups of pollutants that EPA knows or suspects may cause cancer or other serious human health effects. The following HAPs are routinely emitted from glycol dehydration units: Benzene, Ethylbenzene, Formaldehyde, Toluene, and Xylene. The following table lists each HAP's carcinogenic risk (as based on analysis provided in the Integrated Risk Information System [IRIS]):

HAPs	Type	Known/Suspected Carcinogen	Classification
Formaldehyde	VOC	Yes	Category B1 - Probable Human Carcinogen
Benzene	VOC	Yes	Category A - Known Human Carcinogen
Ethylbenzene	VOC	No	Inadequate Data
Toluene	VOC	No	Inadequate Data
Xylenes	VOC	No	Inadequate Data

All HAPs have other non-carcinogenic chronic and acute effects. These adverse health effects may be associated with a wide range of ambient concentrations and exposure times and are influenced by source-specific characteristics such as emission rates and local meteorological conditions. Health impacts are also dependent on multiple factors that affect variability in humans such as genetics, age, health status (e.g., the presence of pre-existing disease) and lifestyle. As stated previously, *there are no federal or state ambient air quality standards for these specific chemicals*. For a complete discussion of the known health effects of each compound refer to the IRIS database located at [www.epa.gov/iris](http://www.epa.gov/iris).

## AIR QUALITY IMPACT ANALYSIS

Modeling was not required of this source due to the fact that the facility is not subject to 45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants) or 45CSR19 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment) as seen in the table listed in the Regulatory Discussion section under 45CSR14/45CSR19.

## SOURCE AGGREGATION DETERMINATION

“Building, structure, facility, or installation” is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person.

- The Starcovic Compressor Station will operate under SIC code 1389 (Oil and Gas Field Services, Not Classified Elsewhere). The upstream gas production wells will operate under SIC code 1311 (Crude Petroleum and Natural Gas). Therefore, both share the same two-digit major SIC code of 13. Therefore, the two (2) entities do belong to the same industrial grouping.
- Williams operates under their parent company, The Williams Companies, Inc. and is the sole operator of the Starcovic Compressor Station. The production wells that send natural gas to the Starcovic Compressor Station are not owned or operated by Williams. Williams has no ownership stake in any production well that may send natural gas to the Starcovic Compressor Station. According to Williams, they have no operational control over any equipment owned or operated by any natural gas producer upstream of the Starcovic Compressor Station. All employees at the Starcovic Compressor Station are under the exclusive direction of Williams and have no reporting authority to any other entity. In addition, no work forces are shared between the Starcovic Compressor Station and the production wells. Contracts are in place for the Starcovic Compressor Station to handle gas from multiple upstream production wells throughout the region. Futuristically, Williams will not have ownership or control of future wellhead activities. The producers are and will be responsible for any decisions to produce or shut-in wellhead facilities and no control over the equipment installed, owned, and operated by Williams. Therefore, these facilities are not under common control.
- There are no other Williams facilities located on contiguous or adjacent properties with the Starcovic Compressor Station. There is a Chevron property that is co-located with this facility, however, they are not under common control. The closest Williams property to the Starcovic Compressor Station is the Keaton Compressor Station located 1.5 miles away.

The Starcovic Compressor Station and production wells share the same industrial grouping. However, they are not under common control. Therefore, the emissions from these two (2) facilities should not be aggregated in determining major source or PSD status.

## MONITORING OF OPERATIONS

Williams will be required to perform the following monitoring:

- Monitor and record quantity of natural gas consumed for all combustion sources.
- Monitor all applicable requirements of 40CFR60 Subparts JJJJ and OOOO, and 40CFR63 Subpart HH.
- Monitor and record quantity of natural gas treated in the glycol dehydration units.

Williams will be required to perform the following recordkeeping:

- Maintain records of the amount of natural gas consumed and hours of operation for all combustion sources.
- Maintain records of the amount of natural gas treated in the glycol dehydration units.
- Maintain records of testing conducted in accordance with the permit. Said records shall be maintained on-site or in a readily accessible off-site location
- Maintain the corresponding records specified by the on-going monitoring requirements of and testing requirements of the permit.
- Maintain records of the visible emission opacity tests conducted per the permit.
- Maintain a record of all potential to emit (PTE) HAP calculations for the entire facility. These records shall include the natural gas compressor engines and ancillary equipment.
- Maintain records of all applicable requirements of 40CFR60 Subparts JJJJ and OOOO, and 40CFR63 Subpart HH.
- The records shall be maintained on site or in a readily available off-site location maintained by Williams for a period of five (5) years.

## RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that Williams meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Starcovic Compressor Station should be granted a 45CSR13 modification permit for their facility.

  
\_\_\_\_\_  
Jerry Williams, P.E.  
Engineer

JUN 17 2015  
\_\_\_\_\_  
Date

