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west virginia department of environmental protection

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Division of Air Quality  
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Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
www.dep.wv.gov

**MEMORANDUM**

**To:** Williams Ohio Valley Midstream, LLC  
Grenadier Station  
R13-3276  
103-00075

**From:** Caraline Griffith

**Date:** February 22, 2016

**Subject:** Williams Ohio Valley Midstream, LLC – Grenadier Station

On February 12, 2016, Williams Ohio Valley Midstream, LLC Grenadier Station permit came off notice from public comment. The below comments were received and appropriate changes made:

Comment 1: Change the mailing address from:

Park Place Corporation Center 2  
2000 Commerce Drive  
Pittsburgh, PA 15275

To:  
100 Teletech Drive, Suite 2  
Moundsville, WV 26041

Response: This update was made to reflect the new mailing address.

Change to Permit: One page 2, the address was changed to reflect the new address.

Comment 2: In Section 5.1.12, change condenser/BTEX Eliminator to Flash Tanks.

Response: Because there are both BTEX Eliminators and Flash Tanks in use and the requirements for capture and control efficiency are the same, the change shall occur as: Flash Tanks/BTEX Eliminator.

Change to Permit: In Section 5.1.12., all references to condenser/BTEX Eliminator were changed to say Flash Tanks/BTEX Eliminator.

Comment 3: In regards to section 5.2.4 – “West Virginia regulations do not allow the DAQ to mandate anything more stringent than what is in federal regulations. This requirement is more

stringent than federal regulations. There is currently no underlying federal requirement for such monitoring and we do not accept this requirement. The API emission factors utilized in the permit application assume that this equipment will leak.”

Response: It was determined that the incorrect section was pulled from the language and will be replaced with the following put into the Limitation and Standards section of the permit:

“The registrant shall install, maintain, and operate all above-ground piping, valves, pumps, etc. that service lines in the transport of potential sources of regulated air pollutants to minimize fugitive escape of regulated air pollutants (leak). Above-ground piping, valves, pumps, etc. that shows signs of excess wear and that have a reasonable potential for fugitive emissions of regulated air pollutants shall be repaired or replaced as needed.”

Change to Permit: Section 5.2.4. was removed from the permit. Section 4.1.6. was added to reflect the correct language and condition.

Comment 4: In regards to Section 5.5.1 – “We request that this requirement be removed, as there is redundancy with requirement 5.5.2. Furthermore, it is unnecessary to submit the results that are under the benzene threshold limit. Such results should be maintained on-site and available upon request.”

Response: Section 5.5.1. states that a wet gas analysis shall be submitted within 60 days of conducting the sampling as required by Section 5.2. of this permit, regardless of what the results are. This is not redundant with section 5.5.2. Section 5.5.2. is to ensure that, if the results of that gas analysis are within 95% of the threshold, the testing done and the results received are correct and can be reviewed by the DAQ for accuracy. This is saying that anytime you do the analysis (for the initial test and any subsequent test) you must submit the results. You have 60 days to provide this information.

Change to Permit: No Change

Comment 5: In regards to Section 5.5.2 – “Submission of a determination under the threshold is not value added. Additionally, submitting such determination would be redundant. If the threshold limit would be exceeded, there are already other actions required by the federal rules.”

Response: Section 5.5.2. is to ensure that, if the results of that gas analysis are within 95% of the threshold, the testing done and the results received are correct and can be reviewed by the DAQ for accuracy. This is saying that at any time you do the gas analysis, submit the results and the levels are within 95% of the threshold, those results will be analyzed thoroughly and checked to make sure the limits are not exceeded. You have 15 days to provide this information.

Change to Permit: No Change

  
Caraline Griffith, Permit Engineer

8/22/16

Date