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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-3231
Plant ID No.:	051-00211
Applicant:	Williams Ohio Valley Midstream, LLC
Facility Name:	Keaton Dehydration Station
Location:	Cameron, Marshall County
NAICS Code:	213112
Application Type:	Modification
Received Date:	January 9, 2015
Engineer Assigned:	Laura Jennings
Fee Amount:	$3,500
Date Received:	January 15, 2015
Complete Date:	February 6, 2015
Due Date:	May 7, 2015
Applicant Ad Date:	January 9, 2015
Newspaper:	*Moundsville Daily Echo*
UTM's:	Easting: 535.96 km Northing: 4,412.00 km Zone: 17S
Description:	The application is to increase the design capacity of the dehydration unit and the lean glycol circulation rate (resulting in VOC emissions exceeding the permit threshold for a source.

DESCRIPTION OF PROCESS

Background:
Williams Ohio Valley Midstream LLC (OVM) has submitted an application for the existing (but currently exempt) OVM Keaton Dehydration Station located west of Adams Hill Rd (County Hwy 250/4), approximately 2.2 miles N-NW of Cameron in Marshall County, WV.

The application requests authorization to increase the dehydrator's design capacity and lean glycol recirculation rate; resulting in the PTE VOC and HAP exceeding the 45CSR13 permit thresholds.

Accordingly, the permit will allow for continued operation of the facility with the design capacities listed in the emission units table.

Process Description:
The application was prepared and submitted to request authorization for continued operation of the following equipment:

- One (1) 6.0 MMscfd Triethylene Glycol (TEG) Dehydrator-01 (RSV-01/1E)
- One (1) 0.22 MMBtu/hr Triethylene Glycol (TEG) Reboiler-01 (RBV-01/2E)
- Facility Process Piping Fugitives (FUG/3E)

A. 6.0 MMscfd TEG dehydrator (RSV-01) is utilized 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 wet gas stream to meet pipeline specifications. In the dehydration process, the wet inlet gas stream flows through a contactor tower where the gas is contacted with the 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 for use as fuel; otherwise these off-gases are vented to the atmospherre.

The rich glycol is then sent from the flash tank to the regenerator/still 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 proces..

B. One (1) 0.22 MMBtu/hr TEG reboiler (RBV-01) is utilized to supply heat for the TEG regenerator/still vent.

C. Storage Tanks. There is one (1) 225 gallon TEG storage tank and one (1) 275 gallon methanol storage tank, each with insignificant emissions.

D. Piping and equipment fugitive emissions (FUG). Fugitive emissions from the 6.0 MMscfd TEG Dehydrator-01 (RSV-01/1E) and associated 0.22 MMBtu/hr TEG Reboiler-01 (RBV-01/2E) result from leaks from different component types (connectors, valves, pumps, etc.) in gas-vapor service.

Emission Units Table:

Emission Unit ID	Emission Point ID	Description	Installed	Capacity	Type of Change	Control Device
RSV-01	1E	TEG Dehydrator Flash Tank and Still Vent	2012	6.0 MMscfd	Modified	Reboiler*

RBV-01	2E	TEG Dehydrator - Reboiler Vent	2012	0.22 MMBtu/hr	Existing	None
FUG	3E	Piping and Equipment Fugitives	2012	n/a	Existing	None
TK-01	4E	Triethylene Glycol (TEG) Storage Tank	2012	225 gal	Existing	None
TK-02	5E	Methanol Storage Tank	2012	275 gal	Existing	None
* ≥ 50% of the flash gas is recycled to reboiler [RBV-01] to be used as fuel						

SITE INSPECTION

This is an existing facility that is according to the application is currently exempt from 45CSR13.

Jamie Jarrett of DAQ's Compliance and Enforcement section conducted a site inspection the week of May 4, 2015.

Directions to the facility:

From Main Street in Cameron: head North on US 250/ Waynesboro Pike for ~ 1.8 miles; turn left onto Clouston Woods/ Grave Creek Road ~ 1.2 miles; Slight right onto Adams Hill Road/ Co. Rd 250/4 ~ 0.5 miles; slight left onto gravel access road ~0.2 miles.

Latitude: 39.857278 Longitude: -80.57958

AGGREGATION DISCUSSION

For New Source Review (NSR) and Title V permitting, the three-part regulatory criteria to determine whether emissions from two or more facilities should be aggregated and treated as a single source is whether the activities:

i) Belong to the same industrial grouping; and
ii) Are located on one or more contiguous or adjacent properties; and
iii) Are under control of the same person (or persons under common control)

i) Same Industrial Grouping:

The subject facility shares the same two-digit major SIC code os 13 as the upstream gas production wells and other Williams' facilities.

ii) Contiguous or Adjacent:

The determination of whether two or more facilities are "contiguous" or "adjacent" is made on a case-by-case basis. This determination is proximity based, and it is important to focus on this criterion and whether two contiguous or adjacent facilities, considered as a single source, meet the common sense notion of a plant. The functional interrelationship of the two or more facilities is not relevant in determining whether the facilities are "contiguous" or "adjacent".

Neither West Virginia nor federal regulations define the terms "contiguous" or "adjacent". It is clear, however, that the determination of whether two or more facilities are "contiguous" or "adjacent" is based on the plain meaning of the terms "adjacent" and "contiguous", which consider the physical distance between the facilities. The term "contiguous" is defined in the dictionary as being in actual contact; touching along a boundary or at a point. The term "adjacent" is defined in the dictionary as not distant, nearby, having a common endpoint or border.

The closest Williams-owned facility to the Keaton Dehydration Facility is the Whipkey Compressor Station (051-00160), which is located over ½ mile away. The Whipkey Compressor Station does not meet the definition of being "contiguous" with or "adjacent" to the Keaton Dehydration Facility.

The Keaton Dehydration Facility dehydrates gas produced from an upstream production well located in northern West Virginia. The subject facility is located on a parcel that is directly adjacent to a pre-existing upstream production wellpad operated by TransEnergy.

The location of the subject facility was chosen because of suitable characteristics for construction and operation, such as the availability of a reasonably flat grade and accessibility for large trucks and equipment. Williams' business model is to construct scalable capacity that contemplates additional production from multiple operators and the initial configuration is merely a foundation for additional opportunities in the area. The subject facility does not need to be located in the immediate vicinity of the upstream wells in order to operate properly. Had suitable land been available elsewhere, the subject facility could have been located farther from the upstream wells without affecting operations.

iii) Common Control:

Williams OVM operates under its parent company The Williams Companies, Inc. (Williams) and is the sole operator of the subject facility. The closes Williams-operated facility to the subject facility is the Whipkey Compressor Station located approximately 1.3 miles to the north-northeast. This facility is the closest to Keaton to have common ownership but is not "contiguous" with or "adjacent" to the Keaton Dehydration facility.

The production wells, including the TransEnergy wellpad, that send natural gas to the subject facility are owned and operated by other companies, which are unaffiliated with Williams. Williams has no ownership stake in the TransEnergy wellpad or in any production well or company in West Virginia that may send natural gas to the subject facility.

Furthermore, neither Williams OVM, nor Williams, exercise operation control over any equipment owned or operated by an natural gas producer upstream of the subject facility. All employees at the subject facility are under the exclusive direction of Williams and are not under the control of any other entity. Similarly, Williams has no authority over employees of the production wells. These companies operate wholly independent of one another. No employees are expected to shuttle back and forth between the subject facility and any production well.

At this time, contracts are in place for the subject facility to process natural gas produced from multiple upstream production wells located throughout the region. As future commercial opportunities are identified, the subject facility will potentially receive gas from other producers. The producers are, and will be responsible for, any decisions to produce or shut-in wellhead facilities and have no control over the equipment installed, owned, and operated by Williams. Similarly, Williams cannot control the installation or operation of any equipment located at a well site that may be considered an air contamination source.

DAQ Aggregation Determination:

The Keaton Dehydration Station is a single stationary source for the purposes of determining major source status because it is not under common control with any of the upstream wells.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emission calculations were reviewed and verified by the writer. The calculation method used for each of the potential emissions is provided below.

The controlled dehydrator flash tank and still vent emissions were calculated using a 50% recycle of the emissions back to the reboiler to be used as fuel. The calculations also include a 20% factor to account for potential future changes in gas quality; this factor is consistent with other DAQ dehydration applications.

Fugitive emissions from equipment leaks are based on the following equipment counts that are defaults for compressor stations from the GRI-HAPCalc model: Valves - 308; Others

(compressor seals, relief valves, diaphragms, drains, meters, etc.) - 36; Connectors - 884; Flanges - 617; and open ended lines - 17.

Emissions Summary Table:

Emission Unit ID	Emission Point ID	Control Device	Regulated Pollutant	Controlled Potential Emissions		Calculation Method
				lb/hr	tpy	
RSV-01	1E	Reboiler (RBV-01)	VOC	5.08	22.25	GLYCalc
			n-Hexane	0.07	0.29	GLYCalc
			Benzene	0.09	0.38	GLYCalc
			Toluene	0.42	1.85	GLYCalc
			Ethylbenzene	0.10	0.44	GLYCalc
			Xylenes	1.83	8.01	GLYCalc
			Total HAP	2.50	10.97	GLYCalc
			CO_2e	144	631	GLYCalc
RBV-01	2E	none	NO_X	0.02	0.10	AP-42
			CO	0.02	0.08	AP-42
			VOC	<0.01	0.01	AP-42
			SO_X	<0.01	<0.01	AP-42
			$PM_{10}/PM_{2.5}$	<0.01	0.01	AP-42
			Total HAP	<0.01	<0.01	AP-42
			CO_2e	26	115	40CFR98

Fugitive Emissions Table:

Fugitive Emission Source	Emission Point ID	Regulated Pollutant	Maximum Potential Emissions		Calculation Method
			lb/hr	tpy	
Equipment Leaks - Gas/Vapor	3E	VOC	0.76	3.36	EPA-453/R-95-017
		n-Hexane	0.01	0.06	EPA-453/R-95-017
		Toluene	<0.01	0.01	EPA-453/R-95-017
		Xylenes	<0.01	0.01	EPA-453/R-95-017
		Total HAP	0.02	0.09	EPA-453/R-95-017
		CO_2e	95	415	40CFR98

Total Facility PTE:

Regulated Pollutant	Proposed Maximum Potential to Emit (TPY) without fugitives	Proposed Maximum Potential to Emit (TPY) with fugitives
NO_X	0.02	0.10
CO	0.02	0.08
VOC	5.84	25.62
SO_2	<0.01	<0.01
$PM_{10}/PM_{2.5}$	<0.01	0.01
Toluene	0.42	1.86
Xylenes	1.83	8.02
Total HAP	2.52	11.06
CO_2e	265	1161

REGULATORY APPLICABILITY

Applicable State Regulations:

45CSR2 TO PREVENT AND CONTROL PARTICULATE AIR POLLUTION FROM COMBUSTION OF FUEL IN INDIRECT HEAT EXCHANGERS

The applicant is not subject to the weight emission standard for particulate matter set forth in 45 CSR2-4.1 because the Reboiler [RBV-01] is less than 10 MMBtu/hr; however, they are subject to the 10% opacity based on a six minute block average. Compliance will be demonstrated by complying with permit requirements. The applicant is using natural gas as fuel; therefore, meeting the 10% opacity requirements should not be a problem.

45CSR10 TO PREVENT AND CONTROL AIR POLLUTION FROM THE EMISSION OF SULFUR OXIDES

The Reboiler [RBV-01] has a maximum design heat input of 0.22 MMBtu/hr which is less than 10 MMBtu/hr and therefore exempt from sections 3, 6, and 8.

45CSR13 PERMITS FOR CONSTRUCTION, MODIFICATION, RELOCATION AND OPERATION OF STATIONARY SOURCES OF AIR POLLUTANTS, NOTIFICATION REQUIREMENTS, ADMINISTRATIVE UPDATES, TEMPORARY PERMITS, GENERAL PERMITS, PERMISSION TO COMMENCE CONSTRUCTION, AND PROCEDURES FOR EVALUATION

The applicant is subject to this rule because the facility has the potential to emit 2 lb/hr or 5 tpy of hazardous air pollutants and is therefore required to obtain a permit.

Williams has demonstrated compliance with 45CSR13 by submitting a complete modification application, and placing a legal advertisement in the *Moundsville Daily Echo* on January 9, 2015.

45CSR22 AIR QUALITY MANAGEMENT FEE PROGRAM

The applicant has paid the $1,000 application fee and the $2,500 NESHAP fee as required by section 3.4.b of this rule because they are subject to NESHAP requirements as described in this regulatory review section.

Additionally, the source is required to maintain their certificate to operate.

45CSR34 EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS

The facility is subject to 45CSR34 by reference of 40 CFR 63, Subparts HH.

Applicable Federal Regulations:

40CFR63, Subpart A GENERAL PROVISIONS

The general provisions apply as required by Subpart HH.

40 CFR63, SUBPART HH NATIONAL EMISSIONS STANDARDS FOR HAZARDOUS AIR POLLUTANTS FROM OIL AND NATURAL GAS PRODUCTION FACILITIES

Subpart HH establishes national emission limitations and operating limitations of HAPs emitted from oil and natural gas production facilities located at major and area sources of HAP emissions. For area source applicability, the affected source includes each triethylene glycol (TEG) dehydration unit located at a facility that meets the criteria specified in §63.760(a).

The TEG dehydration unit is located at an area source of HAPs and thus are subject to this subpart. Because the potential benzene emissions are less than 1 tpy, the units are only subject to the recordkeeping requirements that demonstrate exemption from the control requirements of this rule.

Based on the PTE emissions, the applicant will be in compliance with the benzene exception from § 63.764(d) and further compliance will be demonstrated by demonstrating compliance with the recordkeeping requirements provided in the permit.

Non-applicability determinations. It has been determined that the applicant is not subject to the following rules.

45CSR14 (PERMITS FOR CONSTRUCTION AND MAJOR MODIFICATION OF MAJOR STATIONARY SOURCES FOR THE PREVENTION OF SIGNIFICANT DETERIORATION OF AIR QUALITY)

The Keaton Dehydration Station is not a major source as defined in § 2.3b because it does not emit or have the potential to emit 250 tpy or more of any regulated NSR pollutant. The facility also does not meet the definition of a major modification as defined in § 2.40 because it is not a major source.

45CSR30 (REQUIREMENTS FOR OPERATING PERMITS)

Williams Keaton Dehydration Station is a single stationary source for determining Title V applicability as discussed in the aggregation discussion of this evaluation. The Keaton Dehydration Station does not meet the definition of a major source defined in 45CSR30 § 2.26.a because the facility PTE does not include any individual HAP that emits 10 tpy or more nor a combination of HAPs that emit 25 tpy or more.

The Keaton Dehydration Station does not meet the definition of a major source defined in 45CSR30 § 2.26.b because there is not any air pollutant subject to regulation that has a PTE of 100 tpy or more. The fugitive emissions of a stationary source shall not be considered in determining whether it is a major stationary source unless it belongs to one of the source categories of listed in 2.26.b.

Although the facility is subject to NESHAP, Subpart HH, they are exempt from the obligation to obtain a permit because they are not otherwise required to do so.

40CFR60, SUBPART OOOO STANDARDS OF PERFORMANCE FOR CRUDE OIL AND NATURAL GAS PRODUCTION, TRANSMISSION AND DISTRIBUTION

EPA published its new source performance standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. EPA published final amendments to the subpart on September 23, 2013.

40CFR60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO2) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The affected sources which commence construction, modification or reconstruction after August 23, 2011 are subject to the applicable provisions of this subpart as described below:

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

   There are no gas wells at the Keaton Dehydration 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.

   There are no centrifugal compressors at this facility. Therefore, all requirements

regarding centrifugal compressors affected facilities 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.

There are no reciprocating compressors at this facility. Therefore, all requirements regarding centrifugal compressors affected facilities under 40 CFR 60, Subpart OOOO would not apply.

d. For the natural gas production segment (between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not including natural gas processing plants), 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.

There are no pneumatic controllers that have a bleed rate > 6 scfh. Therefore, the requirements for pneumatic controllers under Subpart OOOO do not apply.

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.

Subpart OOOO defines a storage vessel as a unit that is constructed primarily of non-earthen 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 days 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.

There are no storage vessels at the Keaton Dehydration Station. Therefore, the requirements for storage vessels under Subpart OOOO do not apply.

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

The Keaton Dehydration Station is not a natural gas processing plant. Therefore, the requirements for process units under Subpart OOOO do not apply.

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

There are no sweetening units at the Keaton Dehydration Station. Therefore, none of the requirements regarding sweetening units under Subpart OOOO apply.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

The following hazardous air pollutants are emitted at the facility:

Benzene is found in the air from emissions from burning coal and oil, gasoline service stations, and motor vehicle exhaust. Acute (short-term) inhalation exposure of humans to benzene may cause drowsiness, dizziness, headaches, as well as eye, skin, and respiratory tract irritation, and, at high levels, unconsciousness. Chronic (long-term) inhalation exposure has caused various disorders in the blood, including reduced numbers of red blood cells and aplastic anemia, in occupational settings. Reproductive effects have been reported for women exposed by inhalation to high levels, and adverse effects on the developing fetus have been observed in animal tests. Increased incidence of leukemia (cancer of the tissues that form white blood cells) have been observed in humans occupationally exposed to benzene. EPA has classified benzene as a Group A, human carcinogen.

Ethyl benzene is mainly used in the manufacturing of styrene. Acute (short-term) exposure to ethyl benzene in humans results in respiratory effects, such as throat irritation and chest constriction, irritation of the eyes, and neurological effects, such as dizziness. Chronic (long-term) exposure to ethyl benzene by inhalation in humans has shown conflicting results regarding its effects on the blood. Animal studies have reported effects on the blood, liver, and kidneys from chronic inhalation exposure to ethyl benzene. Limited information is available on the carcinogenic effects of ethyl benzene in humans. In a study by the National Toxicology Program (NTP), exposure to ethyl benzene by inhalation resulted in an increased incidence of kidney and testicular tumors in rats, and lung and liver tumors in mice. EPA has classified ethyl benzene as a Group D, not classifiable as to human carcinogenicity.

n-Hexane is a solvent that has many uses in the chemical and food industries, either in

pure form or as a component of commercial hexane. The latter is a mixture that contains approximately 52% n-hexane; the balance is made up of structural analogs and related chemicals such as methylpentane and methylcyclopentane. Highly purified n-hexane is used as a reagent for chemical or chromatographic separations. Other grades of n-hexane are used as solvents for extracting edible fats and oils in the food industry and as a cleaning agent in the textile, furniture, and printing manufacturing industries. Hexane is the solvent base for many commercial products, such as glues, cements, paint thinners, and degreasers. n-Hexane is a minor constituent of crude oil and natural gas and occurs in different petroleum distillates. No data are available regarding the potential toxicity of n-hexane in humans orally exposed to n-hexane. However, as might be expected for a chemical with such wide application, the potential exists for persons to be environmentally and/or occupationally exposed to n-hexane via other routes of exposure.

Toluene. The acute toxicity of toluene is low. Toluene may cause eye, skin, and respiratory tract irritation. Short-term exposure to high concentrations of toluene (e.g., 600 ppm) may produce fatigue, dizziness, headaches, loss of coordination, nausea, and stupor; 10,000 ppm may cause death from respiratory failure. Ingestion of toluene may cause nausea and vomiting and central nervous system depression. `Contact of liquid toluene with the eyes causes temporary irritation. Toluene is a skin irritant and may cause redness and pain when trapped beneath clothing or shoes; prolonged or repeated contact with toluene may result in dry and cracked skin. Because of its odor and irritant effects, toluene is regarded as having good warning properties. The chronic effects of exposure to toluene are much less severe than those of benzene. No carcinogenic effects were reported in animal studies. Equivocal results were obtained in studies to determine developmental effects in animals. Toluene was not observed to be mutagenic in standard studies. The major use of toluene is as a mixture added to gasoline to improve octane ratings. Toluene is also used to produce benzene and as a solvent in paints, coatings, synthetic fragrances, adhesives, inks, and cleaning agents. Toluene is also used in the production of polymers used to make nylon, plastic soda bottles, and polyurethanes and for pharmaceuticals, dyes, cosmetic nail products, and the synthesis of organic chemicals.

Xylenes. Commercial or mixed xylene usually contains about 40-65% m-xylene and up to 20% each of o-xylene and p-xylene and ethyl benzene. Xylenes are released into the atmosphere as fugitive emissions from industrial sources, from auto exhaust, and through volatilization from their use as solvents. Acute (short-term) inhalation exposure to mixed xylenes in humans results in irritation of the eyes, nose, and throat, gastrointestinal effects, eye irritation, and neurological effects. Chronic (long-term) inhalation exposure of humans to mixed xylenes results primarily in central nervous system (CNS) effects, such as headache, dizziness, fatigue, tremors, and incoordination; respiratory, cardiovascular, and kidney effects have also been reported. EPA has classified mixed xylenes as a Group D, not classifiable as to human carcinogenicity. Mixed xylenes are used in the production of ethylbenzene, as solvents in products such as paints and coatings, and are blended into gasoline.

AIR QUALITY IMPACT ANALYSIS

Modeling was not required for this source due to the fact that the facility is not considered a "major source" according to 45CSR 14 or 45CSR19.

MONITORING OF OPERATIONS

The following monitoring requirements are included in the permit :

- Records to demonstrate facility wide minor source of HAP status on an annual basis
- Throughput monitoring to the dehydration system
- Quarterly monitoring of dehydration unit parameters
- 40 CFR 63, Subpart HH MRR for the TEG dehydration unit
- Visible emissions monitoring of the reboiler upon request

RECOMMENDATION TO DIRECTOR

It is recommended that permit R13-3231 be granted to Williams Ohio Valley Midstream LLC; Keaton Dehydration Station located in Cameron, Marshall County. Based on the information provided in the application, including all supplemental information received, the applicant should be in compliance with all applicable state and federal air regulations.

Laura M. Jennings
Permit Engineer

5/11/15
Date