



west virginia department of environmental protection

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PERMIT DETERMINATION MEMORANDUM

To: Bev McKeone
From: Jerry Williams *jm*
Date: June 30, 2016
Subject: PD16-038, Cranberry Pipeline Corporation (015-00019)

Cranberry Pipeline Corporation submitted PD16-038 on June 13, 2016. PD16-038 was submitted to request a determination for an existing compressor station. Cranberry is seeking confirmation that this facility is not required to have a 45CSR13 permit. The station was built in 1975 and consists of four (4) engines, storage tanks, truck loading and fugitive emissions. The four (4) engines are Ajax DPC230 2 stroke lean burn engines. Nothing has happened that would have triggered "reconstruction" under 40CFR63 Subpart ZZZZ. These engines are subject to work place standards under this rule.

The engines are considered "grandfathered" under 45CSR13. At the time of the facility construction, 45CSR13 section 2.11 exempted internal combustion engines as a "direct affected source". According to Cranberry, no modifications or reconstruction have taken place.

In conclusion, a permit is not required for the existing facility because the facility is considered "grandfathered" under 45CSR13.