

March 31, 2015

## BY: U.S. CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7014 3490 0000 0448 3825

William F. Durham Director, Division of Air Quality WVDEP 601 57<sup>th</sup> Street Charleston, WV 25304

### RE: <u>Dominion Transmission, Inc. – Craig Compressor Station (ID# 085-00004)</u> 45 CSR 13 New Source Review Permit and Title V Operating Permit Revision

Dear Mr. Durham:

Enclosed are one complete original and two (2) cd copies of a 45 CSR 13 permit application to replace the existing dehydration unit, associated reboiler, and the control device at Dominion Transmission, Inc.'s Craig Compressor Station in Ritchie County, West Virginia. The enclosed application also includes the Title V Operating Permit revision forms for permit R30-08500004-2011

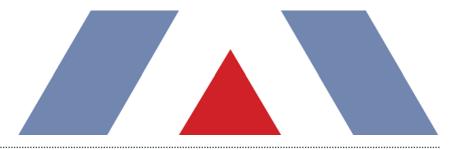
The public notice affidavit will be submitted to WVDEP once it is received from the newspaper.

If you require any additional information, please contact Rebekah Remick at (804) 273-3536 or via email at Rebekah.J.Remick@dom.com.

Sincerely,

n De

Amanda B. Tornabene Director, Gas Environmental Services



# R13 PERMIT APPLICATION Dominion Transmission, Inc. > Craig Compressor Station

# Ritchie County, West Virginia

Prepared By:

TRINITY CONSULTANTS 102 Pickering Way. Suite 506 Exton, PA 19341 (610) 280-3902

March 2015

Project 153902.0022



Environmental solutions delivered uncommonly well

1. INTRODUCTION	3
1.1. FACILITY AND PROJECT DESCRIPTION	3
1.2. R-13 APPLICATION ORGANIZATION	4
2. SAMPLE EMISSION SOURCE CALCULATIONS	5
3. R13 APPLICATION FORM	6
ATTACHMENT A: CURRENT BUSINESS CERTIFICATE	
ATTACHMENT B: MAP	
ATTACHMENT C: INSTALLATION AND START UP SCHEDULE	
ATTACHMENT D: REGULATORY DISCUSSION	
ATTACHMENT E: PLOT PLAN	
ATTACHMENT F: DETAILED PROCESS FLOW DIAGRAM	
ATTACHMENT G: PROCESS DESCRIPTION	
ATTACHMENT I: EMISSION UNITS TABLE	
ATTACHMENT J: EMISSION POINTS DATA SUMMARY SHEET	
ATTACHMENT K: FUGITIVE EMISSIONS DATA SUMMARY SHEET	
ATTACHMENT L: EMISSIONS UNIT DATA SHEETS	
ATTACHMENT M: AIR POLLUTION CONTROL DEVICE SHEET	
ATTACHMENT N: SUPPORTING EMISSION CALCULATIONS	
ATTACHMENT O: MONITORING/RECORDKEEPING/REPORTING/TESTING PLANS	
ATTACHMENT P: PUBLIC NOTICE	
ATTACHMENT S: TITLE V PERMIT REVISION INFORMATION	

Dominion Transmission, Inc. (Dominion) is submitting this Rule 13 (R-13) modification permit application to the West Virginia Department of Environmental Protection (WVDEP) for the proposed modification of an existing natural gas compressor station located in Ritchie County, West Virginia (Craig Compressor Station).

# **1.1. FACILITY AND PROJECT DESCRIPTION**

The Craig Compressor Station is a natural gas gathering facility covered under Standard Industrial Classification (SIC) code 4922. The facility has the potential to operate 24 hours per day, and 7 days per week. The station consists of three (3) lean burn natural gas fired compressor engines (each rated at 869 horsepower [hp]), two (2) natural gas fired emergency generators (each rated at 225 hp), one (1) triethylene glycol (TEG) dehydration unit (rated at 25 million standard cubic feet per day [MMscfd])), with an associated reboiler (rated at 1.00 million British thermal units per hour [MMBtu/hr]) and controlled by an enclosed flare, as well as six (6) miscellaneous storage tanks.

Dominion proposes to replace the existing TEG dehydration unit with an 18 MMscfd unit, complete with new reboiler (rated at 0.75 MMBtu/hr) and controlled by a thermal oxidizer (with a 95% destruction efficiency). The existing dehydrator, reboiler, and flare will be removed.

The purpose of the dehydration unit is to remove water from the natural gas stream using TEG. In the absorber tower, the TEG absorbs water from the gas stream. The water rich glycol then passes through a flash tank where the pressure of the rich TEG is dropped. During this process, natural gas entrained in the glycol stream is flashed off. The flash gas is routed to the station compressor suction. The water rich glycol is then heated in a reboiler where water and impurities are liberated from the glycol before it is recycled through the unit. The emissions from the dehydration regenerator vent are controlled by the thermal oxidizer. The dehydration unit has the potential to operate 8,760 hours per year, which is reflected in emission calculations.

A process flow diagram is included as Attachment F.

# **1.2. R-13 APPLICATION ORGANIZATION**

This R-13 permit application is organized as follows:

- > Section 2: Sample Emission Source Calculations;
- > Section 3: R-13 Application Forms;
- > Attachment A: Business Certificate;
- > Attachment B: Map;
- > Attachment C: Installation and Start Up Schedule;
- > Attachment D: Regulatory Discussion;
- > Attachment E: Plot Plan;
- > Attachment F: Detailed Process Flow Diagram;
- > Attachment G: Process Description;
- > Attachment I: Emission Units Table;
- > Attachment J: Emission Points Data Summary Sheet;
- > Attachment K: Fugitive Emissions Data Summary Sheet;
- > Attachment L: Emissions Unit Data Sheets;
- > Attachment M: Air Pollution Control Device Sheet;
- > Attachment N: Supporting Emission Calculations;
- > Attachment 0: Monitoring/Recordkeeping/Reporting/Testing Plans;
- > Attachment P: Public Notice;
- > Attachment S: Title V Permit Revision Information; and
- > Application Fee.

The characteristics of air emissions from the Craig Compressor Station, along with the methodology used for calculating emissions from the proposed new sources, are described in narrative form below. Detailed supporting calculations are also provided in Attachment N.

The proposed new emission sources at the Craig Compressor Station include the TEG dehydration unit, reboiler, and thermal oxidizer. As mentioned above, these are replacement units. The methodologies employed in calculating emissions from these sources have been summarized below.

- > Reboiler: Potential emissions from the proposed natural gas fired reboiler of all criteria pollutants and HAPs are calculated using U.S. EPA's AP-42 factors for natural gas combustion equipment.<sup>1</sup> These calculations assume a higher heating value of natural gas of 1,000 Btu/scf. Greenhouse gas emissions are calculated according to 40 CFR 98 Subpart C.<sup>2</sup>
- Dehydration Unit: Potential emissions of HAPs, VOC, and methane from the dehydration unit are calculated using GRI-GLYCalc. Emissions of other criteria pollutants are calculated for natural gas combustion in the thermal oxidizer using U.S. EPA's AP-42 factors for external combustion of natural gas.<sup>1</sup> Greenhouse gas emissions from combustion in the thermal oxidizer are calculated according to the procedures in 40 CFR 98 Subpart C.

<sup>&</sup>lt;sup>1</sup> U.S. EPA, AP 42, Fifth Edition, Volume I, Chapter 1.4, *Natural Gas Combustion*, Supplement D, July 1998.

<sup>&</sup>lt;sup>2</sup> 40 CFR 98 Subpart C, General Stationary Fuel combustion Sources, Tables C-1 and C-2.

The WVDEP permit application forms contained in this application include all applicable R-13 application forms including the required attachments.

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION DIVISION OF AIR QUALITY 601 57 <sup>th</sup> Street, SE Charleston, WV 25304 (304) 926-0475 WWW.dep.wv.gov/dag	APPLICATION FOR NSR PERMIT AND TITLE V PERMIT REVISION (OPTIONAL)					
	ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION IF ANY BOX ABOVE IS CHECKED, INCLUDE TITLE V REVISION INFORMATION AS ATTACHMENT S TO THIS APPLICATION ision Guidance" in order to determine your Title V Revision options					
	ty to operate with the changes requested in this Permit Application.					
<ol> <li>Name of applicant (as registered with the WV Secretary o Dominion Transmission, Inc.</li> </ol>						
<ol> <li>Name of facility (if different from above): Craig Compressor Station</li> </ol>	4. The applicant is the:					
5A. Applicant's mailing address: 445 West Main Street Clarksburg, WV 26301	5B. Facility's present physical address: In Ritchie County, Near Smithville, WV					
<ul> <li>If YES, provide a copy of the Certificate of Incorporatio change amendments or other Business Registration Cert</li> </ul>	<ul> <li>change amendments or other Business Registration Certificate as Attachment A.</li> <li>If NO, provide a copy of the Certificate of Authority/Authority of L.L.C./Registration (one page) including any name change</li> </ul>					
7. If applicant is a subsidiary corporation, please provide the	name of parent corporation:					
<ul> <li>8. Does the applicant own, lease, have an option to buy or ot</li> <li>If YES, please explain: Dominion Transmission, Ind</li> <li>If NO, you are not eligible for a permit for this source.</li> </ul>						
<ul> <li>9. Type of plant or facility (stationary source) to be constructed, modified, relocated, administratively updated or temporarily permitted (e.g., coal preparation plant, primary crusher, etc.): Natural Gas Compressor Station</li> <li>10. North American Industry Classification System (NAICS) code for the facility: 486210</li> </ul>						
11A. DAQ Plant ID No. (for existing facilities only): 0 8 5 -0 0 0 0 411B. List all current 45CSR13 and 45CSR30 (Title V) permit numbers associated with this process (for existing facilities only): R30-08500004-2011, R13-2497, R13-2503						
All of the required forms and additional information can be foun	d under the Permitting Section of DAQ's website, or requested by phone.					

12A.

<ul> <li>For Modifications, Administrative Updates or Te present location of the facility from the nearest state</li> </ul>		please provide directions to the
<ul> <li>For Construction or Relocation permits, please p road. Include a MAP as Attachment B.</li> </ul>	provide directions to the proposed new s	<i>tite location</i> from the nearest state
From Clarksburg, take Route 50 West for 41 miles to Elle Route 47. Turn left and go 0.2 miles across bridge up hill. Go 0.3 miles to station.		
12.B. New site address (if applicable):	12C. Nearest city or town: Smithville, WV	12D. County: Ritchie
12.E. UTM Northing (KM): 4324.68	12F. UTM Easting (KM): 491.49	12G. UTM Zone: 17
13. Briefly describe the proposed change(s) at the facilit Installation of replacement dehydrator, reboiler, and ther	-	1
<ul> <li>14A. Provide the date of anticipated installation or change</li> <li>If this is an After-The-Fact permit application, provide and the provided matrix of the provided matrix o</li></ul>	-	14B. Date of anticipated Start-Up if a permit is granted: 11/01/2015
14C. Provide a <b>Schedule</b> of the planned <b>Installation</b> of/ application as <b>Attachment C</b> (if more than one uni		units proposed in this permit
15. Provide maximum projected <b>Operating Schedule</b> o Hours Per Day 24 Days Per Week 7	f activity/activities outlined in this applica Weeks Per Year52	ation:
16. Is demolition or physical renovation at an existing fa	cility involved? XES DO	
17. Risk Management Plans. If this facility is subject to	112(r) of the 1990 CAAA, or will becom	e subject due to proposed
changes (for applicability help see www.epa.gov/cepp	oo), submit your <b>Risk Management Pla</b>	n (RMP) to U.S. EPA Region III.
18. Regulatory Discussion. List all Federal and State a	air pollution control regulations that you	believe are applicable to the
proposed process (if known). A list of possible application	able requirements is also included in Att	achment S of this application
(Title V Permit Revision Information). Discuss applica	bility and proposed demonstration(s) of	compliance (if known). Provide this
information as Attachment D.		
Section II. Additional att	achments and supporting d	ocuments.
19. Include a check payable to WVDEP – Division of Air	Quality with the appropriate application	<b>1 fee</b> (per 45CSR22 and
45CSR13).		
20. Include a <b>Table of Contents</b> as the first page of you	Ir application package.	
21. Provide a <b>Plot Plan</b> , e.g. scaled map(s) and/or sket source(s) is or is to be located as <b>Attachment E</b> (Ref. 1997).		rty on which the stationary
<ul> <li>Indicate the location of the nearest occupied structure</li> </ul>		•
22. Provide a <b>Detailed Process Flow Diagram(s)</b> show device as <b>Attachment F.</b>	ving each proposed or modified emissio	ns unit, emission point and control
23. Provide a Process Description as Attachment G.		
<ul> <li>Also describe and quantify to the extent possible and quantify the extent possible and quantify</li></ul>		
All of the required forms and additional information can be	found under the Permitting Section of DA	AQ's website, or requested by phone.

24. Provide Material Safety Data Sheets	s (MSDS) for all materials proc	essed, used or produced as Attachment H.
- For chemical processes, provide a MS	DS for each compound emitte	d to the air.
25. Fill out the Emission Units Table an	d provide it as Attachment I.	
26. Fill out the Emission Points Data Su	ummary Sheet (Table 1 and 1	able 2) and provide it as Attachment J.
27. Fill out the Fugitive Emissions Data	Summary Sheet and provide	it as Attachment K.
28. Check all applicable Emissions Unit	Data Sheets listed below:	
Bulk Liquid Transfer Operations	Haul Road Emissions	Quarry
Chemical Processes	Hot Mix Asphalt Plant	Solid Materials Sizing, Handling and Storage
Concrete Batch Plant	Incinerator	Facilities
Grey Iron and Steel Foundry	Indirect Heat Exchanger	Storage Tanks
General Emission Unit, specify Dehydr	ration unit	
Fill out and provide the Emissions Unit E		
29. Check all applicable Air Pollution Co	ontrol Device Sheets listed be	
Absorption Systems	Baghouse	⊠ Flare
Adsorption Systems	Condenser	Mechanical Collector
Afterburner	Electrostatic Precip	tator Wet Collecting System
Other Collectors, specify		
Fill out and provide the Air Pollution Cor		
30. Provide all <b>Supporting Emissions C</b> Items 28 through 31.	Calculations as Attachment N	I, or attach the calculations directly to the forms listed in
	compliance with the proposed	ch proposed monitoring, recordkeeping, reporting and emissions limits and operating parameters in this permit
	y not be able to accept all mea	ether or not the applicant chooses to propose such sures proposed by the applicant. If none of these plans clude them in the permit.
32. Public Notice. At the time that the a	application is submitted, place	a Class I Legal Advertisement in a newspaper of general
circulation in the area where the sour	ce is or will be located (See 45	CSR§13-8.3 through 45CSR§13-8.5 and <i>Example Legal</i>
Advertisement for details). Please s	submit the Affidavit of Publica	tion as Attachment P immediately upon receipt.
33. Business Confidentiality Claims.	Does this application include co	onfidential information (per 45CSR31)?
□ YES	⊠ NO	
	ng the criteria under 45CSR§3	ubmitted as confidential and provide justification for each 1-4.1, and in accordance with the DAQ's <i>"Precautionary al Instructions</i> as Attachment Q.
Se	ction III. Certification	n of Information
34. Authority/Delegation of Authority. Check applicable Authority Form be		other than the responsible official signs the application.
Authority of Corporation or Other Busin	ness Entity [	Authority of Partnership
Authority of Governmental Agency	[	Authority of Limited Partnership
Submit completed and signed Authority I	Form as Attachment R.	
		e Permitting Section of DAQ's website, or requested by phone.

35A. Certification of Information. To certify this permit application, a Responsible Official (per 45CSR§13-2.22 and 45CSR§30-2.28) or Authorized Representative shall check the appropriate box and sign below.

#### Certification of Truth, Accuracy, and Completeness

I, the undersigned Responsible Official / Authorized Representative, hereby certify that all information contained in this application and any supporting documents appended hereto, is true, accurate, and complete based on information and belief after reasonable inquiry I further agree to assume responsibility for the construction, modification and/or relocation and operation of the stationary source described herein in accordance with this application and any amendments thereto, as well as the Department of Environmental Protection, Division of Air Quality permit issued in accordance with this application, along with all applicable rules and regulations of the West Virginia Division of Air Quality and W.Va. Code § 22-5-1 et seq. (State Air Pollution Control Act). If the business or agency changes its Responsible Official or Authorized Representative, the Director of the Division of Air Quality will be notified in writing within 30 days of the official change.

#### **Compliance Certification**

Except for requirements identified in the Title V Application for which compliance is not achieved, I, the undersigned hereby certify that, based on information and belief formed after reasonable inquiry, all air contaminant sources identified in this application are in compliance with all applicable requirements.

SIGNATURE But (Please	use blue ink)	DATE: 03-27-15 (Please use blue ink)
35B. Printed name of signee: Brian Sheppard		35C. Title: Vice President, Pipeline Operations
35D. E-mail: brian.c.sheppard@dom.com	36E. Phone: 304-627-3733	36F. FAX: 304-627-3323
36A. Printed name of contact person (if differe	nt from above): Becky Remick	36B. Title: Environmental Specialist III
36C. E-mail: Rebekah.J.Remick@dom.com	36D. Phone: 804-273-3536	36E. FAX:

PLEASE CHECK ALL APPLICABLE ATTACHMENTS INCLUDED	WITH THIS PERMIT APPLICATION:
<ul> <li>Attachment A: Business Certificate</li> <li>Attachment B: Map(s)</li> <li>Attachment C: Installation and Start Up Schedule</li> <li>Attachment D: Regulatory Discussion</li> <li>Attachment E: Plot Plan</li> <li>Attachment F: Detailed Process Flow Diagram(s)</li> <li>Attachment G: Process Description</li> <li>Attachment H: Material Safety Data Sheets (MSDS)</li> <li>Attachment I: Emission Units Table</li> <li>Attachment J: Emission Points Data Summary Sheet</li> </ul>	<ul> <li>Attachment K: Fugitive Emissions Data Summary Sheet</li> <li>Attachment L: Emissions Unit Data Sheet(s)</li> <li>Attachment M: Air Pollution Control Device Sheet(s)</li> <li>Attachment N: Supporting Emissions Calculations</li> <li>Attachment O: Monitoring/Recordkeeping/Reporting/Testing Plans</li> <li>Attachment P: Public Notice</li> <li>Attachment Q: Business Confidential Claims</li> <li>Attachment R: Authority Forms</li> <li>Attachment S: Title V Permit Revision Information</li> <li>Application Fee</li> </ul>
	rmit application with the signature(s) to the DAQ, Permitting Section, at the application. Please DO NOT fax permit applications.
FOR AGENCY USE ONLY – IF THIS IS A TITLE V SOURCE: Forward 1 copy of the application to the Title V Permitting For Title V Administrative Amendments: NSR permit writer should notify Title V permit writer	

For Title V Minor Modifications:

☐ Title V permit writer should send appropriate notification to EPA and affected states within 5 days of receipt,

□ NSR permit writer should notify Title V permit writer of draft permit.

□ For Title V Significant Modifications processed in parallel with NSR Permit revision:

NSR permit writer should notify a Title V permit writer of draft permit,

Device a public notice should reference both 45CSR13 and Title V permits,

EPA has 45 day review period of a draft permit.

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

ATTACHMENT A

**Current Business Certificate** 

# WEST VIRGINIA STATE TAX DEPARTMENT BUSINESS REGISTRATION

# CERTIFICATE

ISSUED TO: DOMINION TRANSMISSION INC 445 W MAIN ST CLARKSBURG, WV 26301-2843

BUSINESS REGISTRATION ACCOUNT NUMBER: 1038-3470

This certificate is issued on: 06/8/2011

This certificate is issued by the West Virginia State Tax Commissioner in accordance with Chapter 11, Article 12, of the West Virginia Code

The person or organization identified on this certificate is registered to conduct business in the State of West Virginia at the location above.

This certificate is not transferrable and must be displayed at the location for which issued. This certificate shall be permanent until cessation of the business for which the certificate of registration, was granted or until it is suspended, revoked or cancelled by the Tax Commissioner.

Change in name or change of location shall be considered a cessation of the business and a new certificate shall be required.

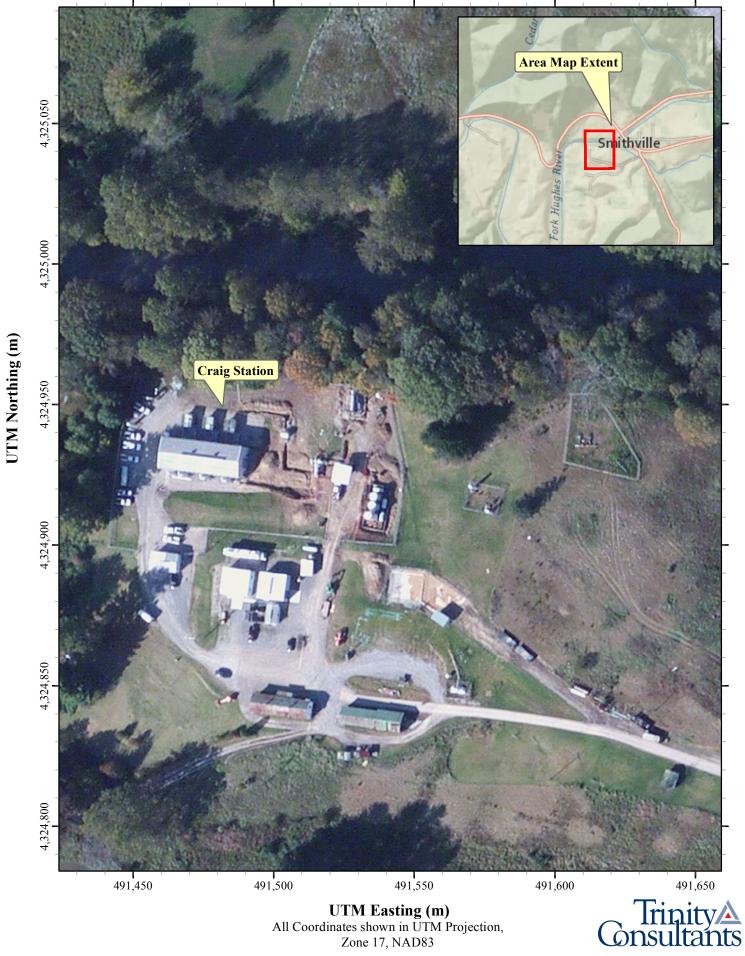
TRAVELING/STREET VENDORS: Must carry a copy of this certificate in every vehicle operated by them. CONTRACTORS, DRILLING OPERATORS, TIMBER/LOGGING OPERATIONS: Must have a copy of this certificate displayed at every job site within West Virginia.

atL006 v.4 L0228957312

# ATTACHMENT B

# Мар

# Attachment B - Aerial Map - Craig Station Dominion Transmission, Inc



UTM Easting (m) All Coordinates shown in UTM Projection, Zone 17, NAD83

# ATTACHMENT C

Startup and Installation Schedule

# ATTACHMENT C

# Schedule of Planned Installation and Start-Up

Unit	Installation Schedule	Startup Schedule
18 MMSCFD	8/1/2015	11/1/2015
Dehydration Unit		
Reboiler	8/1/2015	11/1/2015
Thermal Oxidizer	8/1/2015	11/1/2015

ATTACHMENT D

**Regulatory Discussion** 

# ATTACHMENT D - REGULATORY APPLICABILITY

This section documents the applicability determinations made for Federal and State air quality regulations. The monitoring, recordkeeping, reporting, and testing plan is presented in Attachment O. In this section, applicability or non-applicability of the following regulatory programs is addressed:

- > Prevention of Significant Deterioration (PSD) permitting;
- > Title V of the 1990 Clean Air Act Amendments;
- > New Source Performance Standards (NSPS);
- > National Emission Standards for Hazardous Air Pollutants (NESHAP); and
- > West Virginia State Implementation Plan (SIP) regulations.

This review is presented to supplement and/or add clarification to the information provided in the West Virginia Department of Environmental Protection (WVDEP) Rule 13 (R-13) permit application forms. In addition to providing a summary of applicable requirements, this section of the application also provides non-applicability determinations for certain regulations, allowing the WVDEP to confirm that identified regulations are not applicable to the proposed project at the Craig Compressor Station. Note that explanations of non-applicability are limited to those regulations for which there may be some question of applicability specific to the operations at the Craig Compressor Station. Regulations that are categorically non-applicable are not discussed (e.g., NSPS Subpart J, Standards of Performance for Petroleum Refineries).

## Prevention of Significant Deterioration (PSD) Source Classification

Federal construction permitting programs regulate new and modified sources of attainment pollutants under PSD and new and modified sources of non-attainment pollutants under Non-Attainment New Source Review (NNSR). The Craig Compressor Station is located in Ritchie County, West Virginia, which is designated as in attainment/unclassifiable for all pollutants. Therefore, PSD permitting is potentially applicable to the facility. PSD permitting in West Virginia is regulated under Title 45, Series 14, West Virginia Code of State Regulations (45 CSR 14).

PSD permitting applies to construction of new major stationary sources or any physical change in, or change in the method of operation of an existing major stationary source that results in a significant emissions increase. A major stationary source for PSD is defined as:

- > Any source in one of the listed source categories in the definition of "major stationary source" per 45 CSR 14-2.43 with the potential-to-emit (PTE) of 100 tons per year (tpy) or more of traditionally regulated pollutants, or
- > Any source not in one of the listed source categories with a PTE of 250 tpy or more of any traditionally regulated pollutant.

Natural gas compressor stations are not included in the listed source categories under 45 CSR 14-2.43, so the PSD major source threshold (MST) applicable to the Craig Compressor Station is 250 tpy. Because the existing facility-wide PTE for each pollutant is less than 250 tpy, the Craig Compressor Station is an existing minor source under PSD. PSD applicability is determined based on whether a physical change and/or a change in the method of operation results in an increase of potential air emissions above the MST of 250 tpy of a PSD-regulated pollutant.

This project involves replacement of the existing 25 million standard cubic feet (MMscfd) triethylene glycol (TEG) dehydrator with a smaller unit (18 MMscfd). The potential emissions of PSD pollutants for the new dehydration unit are well below the PSD permitting threshold. As such, PSD permitting is not triggered by this construction activity.

# Title V Operating Permit Program

Title 40 of the Code of Federal Regulations Part 70 (40 CFR 70) establishes the federal Title V operating permit program. West Virginia has incorporated the provisions of this federal program in its Title V operating permit program in 45 CSR 30. The major source thresholds with respect to the West Virginia Title V operating permit program regulations are 10 tons per year (tpy) of a single hazardous air pollutant (HAP), 25 tpy of any combination of HAPs, and 100 tpy of all other regulated pollutants.<sup>1</sup> The potential emissions of NOx and VOC are above the 100 tpy threshold at this facility. Therefore, the Craig Compressor Station is a major source for Title V purposes. The Craig Compressor Station currently operates under Title V permit R30-08500004-2011, issued on December 20, 2011. Attachment S provides a request for incorporation of this project (replacement of existing dehydration unit and associated flare with new dehydration unit and associated thermal oxidizer) into the Title V permit upon completion of construction.

## New Source Performance Standards

New Source Performance Standards (NSPS), located in 40 CFR 60, require new, modified, or reconstructed sources to control emissions to the level achievable by the best demonstrated technology as specified in the applicable provisions. Moreover, any source subject to an NSPS is also subject to the general provisions of NSPS Subpart A, except where expressly noted. The following is a summary of applicability and non-applicability determinations for NSPS regulations of relevance to the proposed project at the Craig Compressor Station.

#### NSPS Subparts D, Da, Db, and Dc - Industrial - Commercial - Institutional Steam Generating Units

These subparts apply to steam generating units of various sizes, all greater than 10 MMBtu/hr. The proposed reboiler will have a rated capacity of 0.75 MMBtu/hr and therefore the requirements of these subparts do not apply.

## NSPS Subpart OOOO-Crude Oil and Natural Gas Production, Transmission, and Distribution

Subpart OOOO applies to affected facilities that commenced construction, reconstruction, or modification after August 23, 2011. This NSPS was published in the Federal Register on August 16, 2012, with an effective date of October 15, 2012. On July 1, 2014, the EPA proposed second revisions to NSPS 0000.

The list of potentially affected facilities includes:

- Gas wells
- > Centrifugal compressors
- > Reciprocating compressors
- > Pneumatic controllers
- > Storage vessels
- > Equipment (as defined in §60.5430) located at onshore natural gas processing plants
- > Sweetening units located onshore that process natural gas produced from either onshore or offshore wells

The Craig Compressor Station is proposing to replace the dehydration unit, which is not an affected facility under this subpart. As such, Subpart 0000 is not applicable to the project.

<sup>&</sup>lt;sup>1</sup> EPA's Tailoring Rule had established a Title V major source threshold of 100,000 tpy of greenhouse gas pollutants or GHGs (on a carbon dioxide equivalent [CO<sub>2</sub>e] basis). However, on June 23, 2014, the U.S. Supreme Court issued its decision in *Utility Air Regulatory Group v. EPA*, whereby the Court said that EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is a major source required to obtain a PSD or Title V permit. Case No. 12-1146, decided June 23, 2014. http://www.supremecourt.gov/opinions/13pdf/12-1146\_4g18.pdf.

#### Non-Applicability of All Other NSPS

NSPS are developed for particular industrial source categories. Other than the NSPS developed for steam generating units (Subparts D, Da, Db, Dc) and natural gas processing plants (Subpart 0000), the applicability of a particular NSPS to the proposed project at the Craig Compressor Station can be readily ascertained based on the industrial source category covered. All other NSPS are categorically not applicable to the proposed change.

## National Emission Standards for Hazardous Air Pollutants (NESHAP)

Part 63 NESHAP allowable emission limits are established on the basis of a maximum achievable control technology (MACT) determination for a particular source. A HAP major source is defined as having potential emissions in excess of 25 tpy for total HAP and/or potential emissions in excess of 10 tpy for any individual HAP. The Craig Compressor Station is an area (minor) source of HAPs since its potential emissions of HAPs are less than the 10/25 major source thresholds. NESHAP apply to sources in specifically regulated industrial source categories (Clean Air Act Section 112(d)) or on a case-by-case basis (Section 112(g)) for facilities not regulated as a specific industrial source type.

The following NESHAP are potentially applicable to the proposed project at the Craig Compressor Station:

- > 40 CFR Part 63 Subpart HH Oil and Natural Gas Production Facilities
- > 40 CFR Part 63 HHH Natural Gas Transmission and Storage Facilities
- > 40 CFR Part 63 Subpart DDDDD Industrial, Commercial, and Institutional Boilers Major Sources
- > 40 CFR Part 63 Subpart JJJJJJ Industrial, Commercial, and Institutional Boilers Area Sources

The applicability of these NESHAP Subparts is discussed in the following sections.

#### 40 CFR 63 Subpart HH - Oil and Natural Gas Production Facilities

This subpart applies to affected emission points that are located at facilities that are major and area sources of HAP and either process, upgrade, or store hydrocarbon liquids prior to custody transfer or that process, upgrade, or store natural gas prior to entering the natural gas transmission and storage source category. For purposes of this subpart, natural gas enters the natural gas transmission and storage source category after the natural gas processing plant, if present. As such, this subpart applies to affected units located at natural gas processing facilities and/or any production facilities upstream.

The Craig Compressor Station is an area source of HAP emissions. The station processes natural gas in its glycol dehydrator prior to the point of custody transfer to transmission pipelines and therefore, the provisions of NESHAP Subpart HH are applicable to the Craig Compressor Station. The benzene emissions from the glycol dehydrator vents are less than 0.90 megagrams per year (1 tpy), as indicated in the emission calculations in Attachment N. Dominion is claiming the exemption specified in 40 CFR 63.764(e)(1)(ii) and therefore is not subject to the control requirements for glycol dehydration unit process vents in 40 CFR 63.675. The Craig Compressor Station is only required to keep records of the actual annual average natural gas throughput (in terms of natural gas flowrate to the glycol dehydration unit per day) or actual average benzene emissions (in terms of benzene emissions per year) from the dehydrator, per 40 CFR 63.774(d)(1).

#### 40 CFR 63 Subpart HHH - Natural Gas Transmission and Storage Facilities

This standard applies to affected units at natural gas transmission and storage facilities that are major sources of HAP emissions located downstream of the point of custody transfer (after processing and/or treatment in the production sector), but upstream of the distribution sector. As previously indicated, the Craig Compressor Station is a gathering facility located upstream of the point of custody and is an area (minor) source of HAPs; therefore, the provisions of NESHAP Subpart HHH do not apply.

40 CFR 63 Subpart DDDDD - Industrial, Commercial, and Institutional Boilers (Major Source Boiler MACT)

This MACT standard applies to industrial, commercial, and institutional boilers and process heaters of various sizes and fuel types located at major sources of HAP. The Craig compressor station is an area source of HAP emissions, therefore this subpart does not apply.

# 40 CFR 63 Subpart JJJJJJ – Industrial, Commercial, and Institutional Boilers (Area Source Boiler MACT)

This MACT standard applies to industrial, commercial, and institutional boilers of various sizes and fuel types located at area sources of HAP. Gas-fired boilers are exempt from the requirements under 40 CFR 63.11195(e). Therefore, this subpart does not apply to the proposed gas-fired reboiler.

#### Non-Applicability of All Other NESHAP

Similar to NSPS, NESHAP are developed for particular industrial source categories. Other than the NESHAP developed for boilers and heaters (Subparts DDDDD, and JJJJJJ) and natural gas sector facilities (Subpart HH, HHH), the applicability of a particular NESHAP to the proposed project at the Craig Compressor Station can be readily ascertained based on the industrial source category covered. All other NESHAP are categorically not applicable to the proposed change.

## West Virginia SIP Regulations

The proposed project at the Craig Compressor Station is potentially subject to regulations contained in the West Virginia Code of State Regulations, Chapter 45 (Code of State Regulations). West Virginia regulations potentially applicable to the proposed project are discussed below.

#### 45 CSR 2: Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers

45 CSR 2 applies to fuel burning units, defined as equipment burning fuel "for the primary purpose of producing heat or power by indirect heat transfer". The reboiler at the Craig Compressor Station meets this definition and is therefore potentially subject to 45 CSR 2. Per 45 CSR 2-3, opacity of emissions from the reboiler shall not exceed 10 percent based on a six minute block average. Per 45 CSR 2-11.1, the reboiler is exempt from the PM emissions limits in sections 4, 5, 6, 8 and 9 of the rule because it has a rated heat input capacity less than 10 MMBtu/hr.

#### 45 CSR 6: To Prevent and Control Air Pollution from Combustion of Refuse

45 CSR 10 sets forth requirements for limiting emissions from incineration which is defined as "the destruction of combustible refuse by burning in a furnace designed for that purpose. For the purposes of this rule, the destruction of any combustible liquid or gaseous material by burning in a flare or flare stack, thermal oxidizer, or thermal catalytic oxidizer stack shall be considered incineration." The proposed thermal oxidizer meets this definition and is therefore subject to this regulation.

The thermal oxidizer will be subject to the particulate matter (PM) emission limits in 45 CSR 6-4.1. In addition, opacity from the thermal oxidizer will be limited to 20% per 45 CSR 6-4.3 except as provided in 45 CFR 6-4.4. Operating instructions will be posted as required by 45 CSR 6-4.9.

#### 45 CSR 10: To Prevent and Control Air Pollution from the Emission of Sulfur Oxides

45 CSR 10 applies to fuel burning units, defined as equipment burning fuel "for the primary purpose of producing heat or power by indirect heat transfer". The reboiler at the Craig Compressor Station meets this definition and is

therefore potentially subject to 45 CSR 10. However, per 45 CSR 10-10.1, the reboiler is exempt from the SO<sub>2</sub> emissions limits because it has a rated heat input capacity less than 10 MMBtu/hr.

# 45 CSR 13: 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

According to 45 CSR 13, "No person shall cause, suffer, allow or permit the construction, modification, or relocation of any stationary source to be commenced without notifying the Secretary of such intent and obtaining a permit to construct, modify, or relocate the stationary source as required in this rule or any other applicable rule promulgated by the Secretary." In compliance with this requirement, Dominion is submitting the attached permit application for the replacement of the dehydration unit at the Craig Compressor Station.

#### 45 CSR 16: Standards of Performance for New Stationary Sources

This rule adopts the standards of performance for new stationary sources set forth in 40 CFR Part 60 by reference. Potentially applicable NSPS are discussed above.

#### 45 CSR 21: To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds

45 CSR 21 is intended to require reasonably available control technology for VOC sources in Putnam, Kanawha, Cabell, Wayne, and Wood Counties. As such, these requirements do not apply to VOC sources in Ritchie County.

#### 45 CSR 27: To Prevent and Control the Emissions of Toxic Air Pollutants

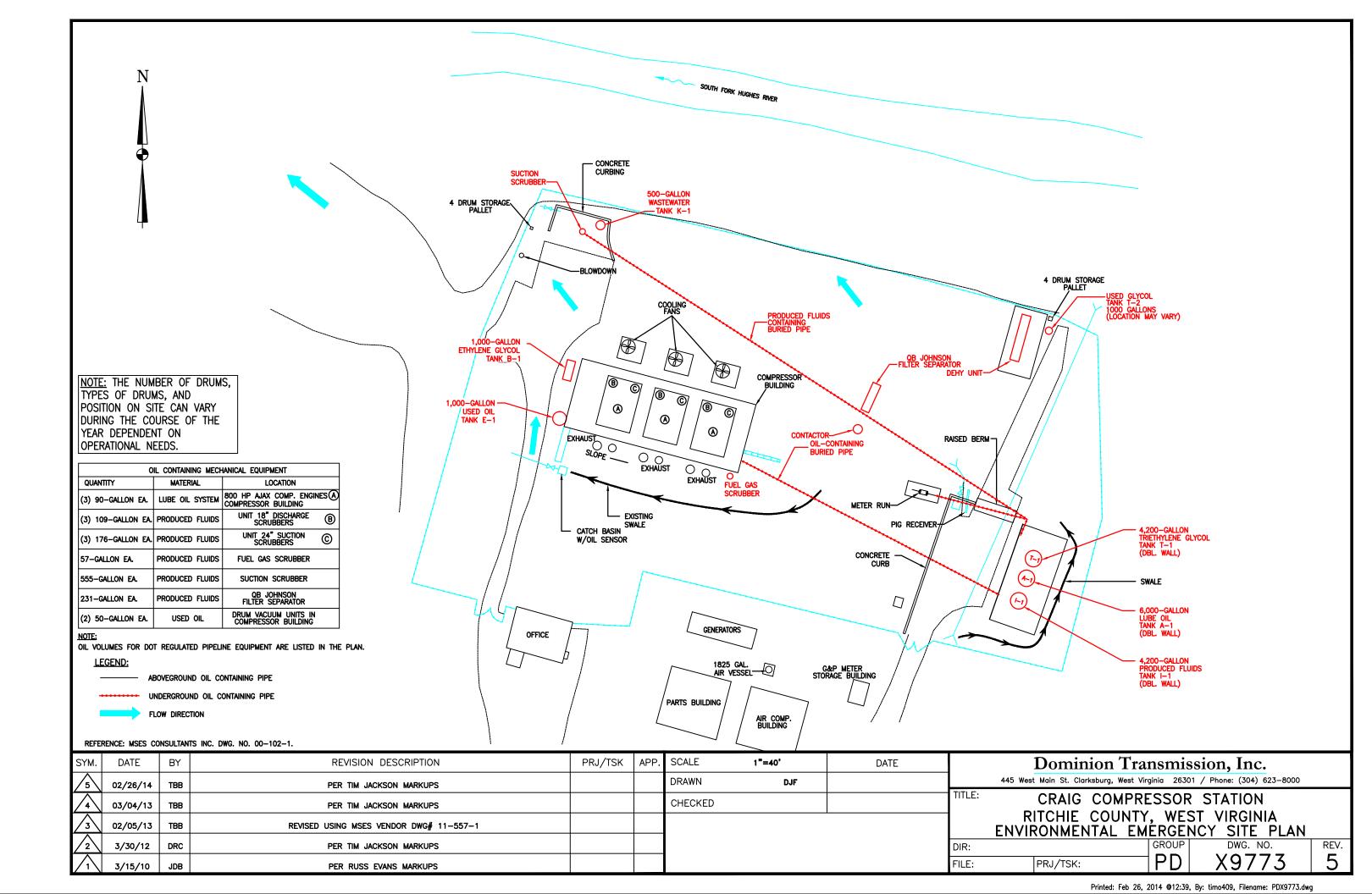
West Virginia regulates the emissions of toxic air pollutant emissions through 45 CSR 27. A facility that discharges, or may discharge, a toxic pollutant into the open atmosphere in quantities greater than those delineated in Table A of this rule is required to employ Best Available Technology (BAT) on all chemical processing equipment emitting the pollutant. The TEG dehydrator meets the definition of chemical processing equipment and is potentially subject to this regulation for benzene emissions. The potential to emit threshold quantity listed for benzene is 1,000 pounds per year. Emissions of benzene from the TEG dehydrator are less than 1,000 pounds per year. As such, this regulation does not apply to the project at the Craig Compressor Station.

#### 45 CSR 34: Emission Standards for Hazardous Air Pollutants

This rule adopts the National Emissions Standards for Hazardous Air Pollutants (NESHAPs by reference. Potentially applicable NESHAP are discussed above.

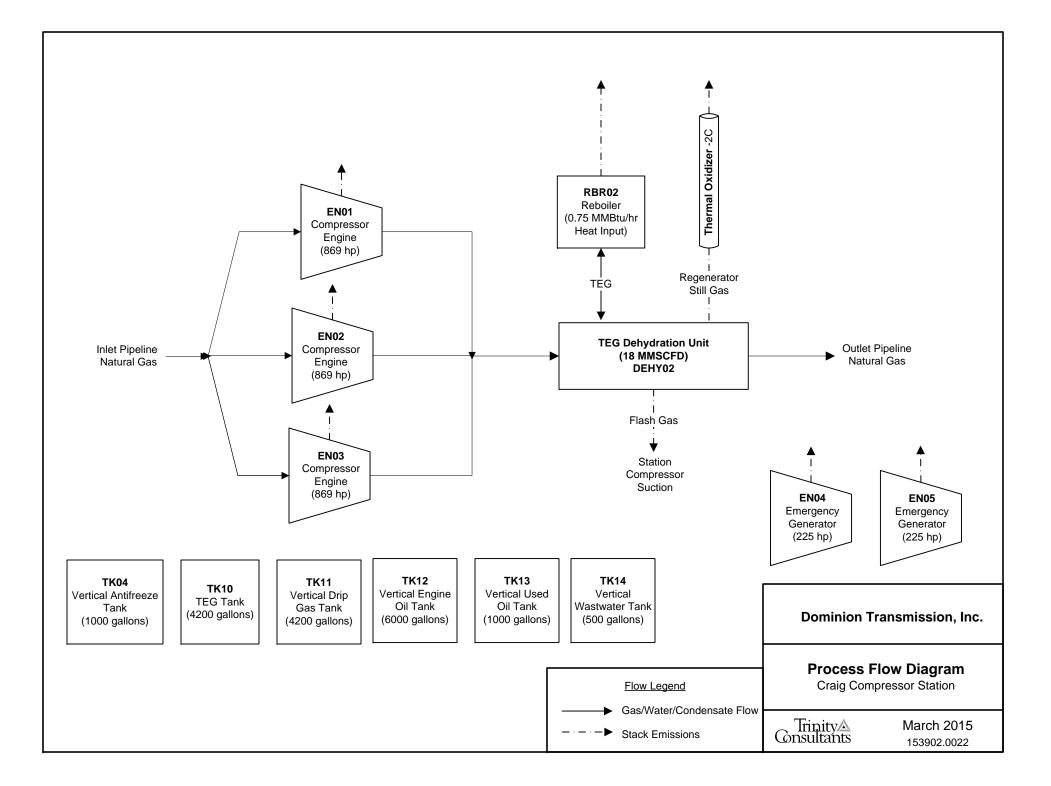
ATTACHMENT E

# **Plot Plan**



ATTACHMENT F

**Detailed Process Flow Diagram** 



ATTACHMENT G

**Process Description** 

# ATTACHMENT G - PROCESS DESCRIPTION

Natural gas enters the station via a pipeline system and is compressed using the three (3) natural gas-fired compressor engines (identified as EN01 – EN03 and rated at 869 hp each). The compressed natural gas stream is then processed through the triethylene glycol (TEG) dehydration unit (with associated reboiler), identified as DEHY02. The dehydration unit will introduce TEG to the gas stream in a contact tower to absorb water vapor from the gas to a level not exceeding 7 pounds per million standard cubic feet (lb/MMscf). The TEG is then sent to the natural gas-fired reboiler, rated at 0.75 MMBtu/hr heat input (RBR02). The water is evaporated from the TEG in the reboiler and discharged, and the glycol is then sent back to the contact tower for reuse. The dehydration unit is equipped with a thermal oxidizer (2C) which will control emissions from the dehydration still vent, and the emissions from the flash tank will be routed to the station compressor suction. The natural gas stream from the contact tower flows into the pipeline to be transported further along the pipeline system. The station is also equipped with six (6) storage tanks and two (2) emergency backup generators, rated at 225 hp each.

A process flow diagram is included as Attachment F.

ATTACHMENT I

**Emission Units Table** 

# Attachment I

## **Emission Units Table**

#### (includes all emission units and air pollution control devices

that will be part of this permit application review, regardless of permitting status)

Emission Unit ID <sup>1</sup>	Emission Point ID <sup>2</sup>	Emission Unit Description	Year Installed/ Modified	Design Capacity	Type <sup>3</sup> and Date of Change	Control Device <sup>4</sup>
DEHY02	DEHY02	Dehydration Unit (Regenerator Still)	2015	18 MMSCFD	New	2C
RBR02	RBR02	Reboiler (associated with Dehydration Unit)	2015	0.75 MMBtu/hr	New	None
2C	2C	Thermal Oxidizer	2015	95% Destruction Efficiency	New	None
DEHY01	DEHY01	Dehydration Unit (Regenerator Still)	1984	25 MMSCFD	Removal	1C
RBR01	RBR01	Reboiler (associated with Dehydration Unit)	1984	1 MMBtu/hr	Removal	None
1C	1C	Thermal Oxidizer	1984	95% Destruction Efficiency	Removal	None

<sup>1</sup> For Emission Units (or <u>Sources</u>) use the following numbering system:1S, 2S, 3S,... or other appropriate designation. <sup>2</sup> For Emission Points use the following numbering system:1E, 2E, 3E, ... or other appropriate designation.

<sup>3</sup>New, modification, removal

<sup>4</sup> For <u>C</u>ontrol Devices use the following numbering system: 1C, 2C, 3C,... or other appropriate designation.

Page \_\_\_\_1 \_\_\_ of \_\_\_1\_\_\_\_

ATTACHMENT J

**Emission Points Data Summary Sheet** 

## Attachment J EMISSION POINTS DATA SUMMARY SHEET

						Т	able 1:	Emissions Da	ta								
Emission Point ID No. (Must match Emission Units Table	Emissio n Point Type <sup>1</sup>	Point Through This Point		Device E (Must match		Vent Time for Emission Unit (chemical processes only)		t Pollutants - Chemical	Pollutants - Potenti Chemical Uncontro		Maximum Potential Uncontrolled Emissions <sup>4</sup>		Maximum Potential Controlled Emissions <sup>5</sup>		Emission Form or Phase <i>(At exit</i>	Est. Method Used <sup>6</sup>	Emission Concentration <sup>7</sup> (ppmv or mg/m <sup>4</sup> )
& Plot Plan)		ID No.	Source	ID No.	Device Type	Short Term <sup>2</sup>	Max (hr/yr)	(Speciate VOCs & HAPS)	lb/hr	ton/yr	lb/hr	ton/yr	conditions, Solid, Liquid or Gas/Vapor)				
DEHY02	Upward Vertical Stack	DEHY02	Dehydration Unit (Emissions only)	2C	Thermal Oxidizer	NA	NA	VOC Total HAP CO2e	174 48 3,433	761 211 15,038	6.83 2.27 116	30 9.95 508	Gas/Vapor	O <sup>A</sup> O <sup>A</sup> O <sup>A,B</sup>			
RBR02	Upward Vertical Stack	RBR02	Reboiler	NA	NA	NA	NA	NOx CO PM/PM10/PM2.5 SO2 VOC Total HAP CO2e	0.11 0.09 0.008 0.0007 0.006 0.002 129	0.48 0.41 0.04 0.003 0.03 0.009 556	0.11 0.09 0.008 0.0007 0.006 0.002 129	0.48 0.41 0.04 0.003 0.03 0.009 556	Gas/Vapor	O <sup>C</sup> O <sup>C</sup> O <sup>C</sup> O <sup>C</sup> O <sup>D</sup>			
2C	Upward Vertical Stack	2C	Thermal Oxidizer	NA	NA	NA	NA	NOx CO PM/PM10/PM2.5 SO <sub>2</sub> CO2e	N/A	N/A	0.33 0.27 0.02 0.002 381	1.42 1.2 0.11 0.009 1,667	Gas/Vapor	O <sup>c</sup> O <sup>c</sup> O <sup>c</sup> O <sup>D</sup>			

A- GRI-GLYCalc

B- 40 CFR 98, Subpart A, global warming potentials.

C- AP Section 1.4 Tables 1.4-1, 1.4-2, 1.4-3, and 1.4-4 July 1998.

D- 40 CFR 98, Subpart C for natural gas fired combustion,

The EMISSION POINTS DATA SUMMARY SHEET provides a summation of emissions by emission unit. Note that uncaptured process emission unit emissions are not typically considered to be fugitive and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET. Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions). Please complete the FUGITIVE EMISSIONS DATA SUMMARY SHEET for fugitive emission activities.

<sup>1</sup> Please add descriptors such as upward vertical stack, downward vertical stack, horizontal stack, relief vent, rain cap, etc.

<sup>2</sup> Indicate by "C" if venting is continuous. Otherwise, specify the average short-term venting rate with units, for intermittent venting (ie., 15 min/hr). Indicate as many rates as needed to clarify frequency of venting (e.g., 5 min/day, 2 days/wk).

<sup>3</sup> List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. **LIST** Acids, CO, CS<sub>2</sub>, VOCs, H<sub>2</sub>S, Inorganics, Lead, Organics, O<sub>3</sub>, NO, NO<sub>2</sub>, SO<sub>2</sub>, SO<sub>3</sub>, all applicable Greenhouse Gases (including CO<sub>2</sub> and methane), etc. **DO NOT LIST** H<sub>2</sub>, H<sub>2</sub>O, N<sub>2</sub>, O<sub>2</sub>, and Noble Gases.

<sup>4</sup> Give maximum potential emission rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>5</sup> Give maximum potential emission rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>6</sup> Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

<sup>7</sup> Provide for all pollutant emissions. Typically, the units of parts per million by volume (ppmv) are used. If the emission is a mineral acid (sulfuric, nitric, hydrochloric or phosphoric) use units of milligram per dry cubic meter (mg/m<sup>3</sup>) at standard conditions (68 °F and 29.92 inches Hg) (see 45CSR7). If the pollutant is SO<sub>2</sub>, use units of ppmv (See 45CSR10).

## Attachment J **EMISSION POINTS DATA SUMMARY SHEET**

Table 2: Release Parameter Data									
Emission	Inner		Exit Gas		Emission Point El	evation (ft)	UTM Coordinates (km)		
No. No. (Must match Emission Units Table)	(Must match Emission		Temp. Volumetric Flow <sup>1</sup> (acfm) (°F) <i>at operating conditions</i>		Ground Level (Height above mean sea level)	Stack Height <sup>2</sup> (Release height of emissions above ground level)	Northing	Easting	
RBR02	1.06	1,103	566.7	13.6	700	30	4,324.68	491.49	
2C	1.9	1,637	4,791.7	47.47	700	40	4,324.68	491.49	

<sup>1</sup> Give at operating conditions. Include inerts. <sup>2</sup> Release height of emissions above ground level.

ATTACHMENT K

Fugitive Emissions Data Summary Sheet

## Attachment K

## FUGITIVE EMISSIONS DATA SUMMARY SHEET

The FUGITIVE EMISSIONS SUMMARY SHEET provides a summation of fugitive emissions. Fugitive emissions are those emissions which could not reasonably pass through a stack, chimney, vent or other functionally equivalent opening. Note that uncaptured process emissions are not typically considered to be fugitive, and must be accounted for on the appropriate EMISSIONS UNIT DATA SHEET and on the EMISSION POINTS DATA SUMMARY SHEET.

Please note that total emissions from the source are equal to all vented emissions, all fugitive emissions, plus all other emissions (e.g. uncaptured emissions).

	APPLICATION FORMS CHECKLIST - FUGITIVE EMISSIONS
1.)	Will there be haul road activities?
	□ Yes
	If YES, then complete the HAUL ROAD EMISSIONS UNIT DATA SHEET.
2.)	Will there be Storage Piles?
	□ Yes
	☐ If YES, complete Table 1 of the NONMETALLIC MINERALS PROCESSING EMISSIONS UNIT DATA SHEET.
3.)	Will there be Liquid Loading/Unloading Operations?
	□ Yes
	If YES, complete the BULK LIQUID TRANSFER OPERATIONS EMISSIONS UNIT DATA SHEET.
4.)	Will there be emissions of air pollutants from Wastewater Treatment Evaporation?
	□ Yes
	If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
5.)	Will there be Equipment Leaks (e.g. leaks from pumps, compressors, in-line process valves, pressure relief devices, open-ended valves, sampling connections, flanges, agitators, cooling towers, etc.)?
	□ Yes
	☐ If YES, complete the LEAK SOURCE DATA SHEET section of the CHEMICAL PROCESSES EMISSIONS UNIT DATA SHEET.
6.)	Will there be General Clean-up VOC Operations?
	□ Yes
	If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET.
7.)	Will there be any other activities that generate fugitive emissions?
	□ Yes
	If YES, complete the GENERAL EMISSIONS UNIT DATA SHEET or the most appropriate form.
	bu answered "NO" to all of the items above, it is not necessary to complete the following table, "Fugitive Emissions mmary."

FUGITIVE EMISSIONS SUMMARY	All Regulated Pollutants <sup>-</sup> Chemical Name/CAS <sup>1</sup>	Maximum Potential Uncontrolled Emissions <sup>2</sup>		Maximum Potential Controlled Emissions <sup>3</sup>		Est. Method
	Chemical Name/CAS	lb/hr	ton/yr	lb/hr	ton/yr	Used <sup>4</sup>
Haul Road/Road Dust Emissions Paved Haul Roads	NA					
Unpaved Haul Roads	NA					
Storage Pile Emissions	NA					
Loading/Unloading Operations	NA					
Wastewater Treatment Evaporation & Operations	NA					
Equipment Leaks	NA					
General Clean-up VOC Emissions	NA					
Other	NA					

<sup>1</sup> List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS<sub>2</sub>, VOCs, H<sub>2</sub>S, Inorganics, Lead, Organics, O<sub>3</sub>, NO, NO<sub>2</sub>, SO<sub>2</sub>, SO<sub>3</sub>, all applicable Greenhouse Gases (including CO<sub>2</sub> and methane), etc. DO NOT LIST H<sub>2</sub>, H<sub>2</sub>O, N<sub>2</sub>, O<sub>2</sub>, and Noble Gases.

<sup>2</sup> Give rate with no control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>3</sup> Give rate with proposed control equipment operating. If emissions occur for less than 1 hr, then record emissions per batch in minutes (e.g. 5 lb VOC/20 minute batch).

<sup>4</sup> Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; O = other (specify).

ATTACHMENT L

**Emission Unit Data Sheet** 

		Manufacturer and Model		Ineg	gral
Ma		Max Dry Gas F	low Rate (mmscf/day)	18 MMscf/day	
		Design Heat	Input (mmBtu/hr)	0.75 MMBtu/hr	
		Design Typ	be (DEG or TEG)	TEG	
	l Glycol	Sou	rce Status <sup>2</sup>	N	S
•	tion Unit ata	Date Installed	/Modified/Removed <sup>3</sup>	Novemb	er 2015
		Regenerator	Still Vent APCD <sup>4</sup>	TO	)
		Fuel H	IV (Btu/scf)	1,0	00
		H <sub>2</sub> S Cont	tent (gr/100 scf)	0 ppm	
		Opera	tion (hrs/yr)	8,760	
Source ID #1	Vent	Reference <sup>5</sup>	Potential Emissions <sup>6</sup>	lbs/hr	tons/yr
		AP	NO <sub>X</sub>	0.11	0.48
		AP	СО	0.09	0.41
RBR02	Reboiler Vent	AP	VOC	0.006	0.03
		AP	$SO_2$	0.0006	0.003
		AP	PM <sub>10</sub>	0.008	0.04
		GR	VOC	6.8	30
		GR	Benzene	0.05	0.2
Glycol DEHY02 Regenerator	GR	Ethylbenzene	0.04	0.2	
DEITIUZ	Still Vent	GR	Toluene	0.3	1.1
		GR	Xylenes	1.8	7.8
		GR	n-Hexane	0.05	0.2

# NATURAL GAS GLYCOL DEHYDRATION UNIT DATA SHEET

- 1. Enter the appropriate Source Identification Numbers for the glycol dehydration unit Reboiler Vent and glycol Regenerator Still Vent. The glycol dehydration unit Reboiler Vent and glycol Regenerator Still Vent should be designated RBV-1 and RSV-1, respectively. If the compressor station incorporates multiple glycol dehydration units, a Glycol Dehydration Unit Data Sheet shall be completed for each, using Source Identification #s RBV-2 and RSV-2, RBV-3 and RSV-3, etc.
- 2. Enter the Source Status using the following codes:

NS	Construction of New Source	ES	Existing Source
MS	Modification of Existing Source	RS	Removal of Source

- 3. Enter the date (or anticipated date) of the glycol dehydration unit's installation (construction of source), modification or removal.
- 4. Enter the Air Pollution Control Device (APCD) type designation using the following codes:
  - NA None CD Condenser FL CC Flare
  - TO Thermal Oxidizer

Condenser/Combustion Combination

5. Enter the Potential Emissions Data Reference designation using the following codes:

MD	Manufacturer's Data	AP	AP-42	
GR	GRI-GLYCalc <sup>TM</sup>	OT	Other	(please list)

6. Enter the Reboiler Vent and glycol Regenerator Still Vent Potential to Emit (PTE) for the listed regulated pollutants in lbs per hour and tons per year. The glycol Regenerator Still Vent potential emissions may be determined using the most recent version of the thermodynamic software model GRI-GLYCalc<sup>TM</sup> (Radian International LLC & Gas Research Institute). Attach all referenced Potential Emissions Data (or calculations) and the GRI-GLYCalc Aggregate Calculations Report to this Glycol Dehydration Unit Data Sheet(s). This PTE data shall be incorporated in the Emissions Summary Sheet.

Include a copy of the GRI-GLYCalc<sup>TM</sup> analysis. This includes a printout of the aggregate calculations report, which shall include emissions reports, equipment reports, and stream reports.

\*An explanation of input parameters and examples, when using GRI-GLYCalc<sup>TM</sup> is available on our website.

#### West Virginia Department of Environmental Protection

#### DIVISION OF AIR QUALITY : (304) 926-0475 WEB PAGE: http://www.wvdep.org

#### Division of Air Quality 40 CFR Part 63; Subpart HH & HHH Registration Form

Complete this form for any oil and natural gas production or natural gas transmission and storage facility that uses an affected unit under HH/HHH, whether subject or not.

Section A: Facility Description					
Affected facility actual annual average natural gas throughput (scf/day): 18 MMscf/day					
Affected facility actual annual average hydrocarbon liquid throughput: (bbl/day): N/A					
The affected facility processes, upgrades, or stores hydrocarbon liquids prior to custody t					
The affected facility processes, upgrades, or stores natural gas prior to the point at which					
(NG) enters the NG transmission and storage source category or is delivered to the end u	ser.				
The affected facility is:	ssing plant				
prior to the point of custody transfer and there is no NG process	• •				
The affected facility transports or stores natural gas prior to entering the pipelin	e to a local <u>Yes</u> No				
distribution company or to a final end user (if there is no local distribution company).					
The affected facility exclusively processes, stores, or transfers black oil.	Yes <u>No</u>				
Initial producing gas-to-oil ratio (GOR):scf/bbl API gravity:de	grees				
Section B: Dehydration Unit (if applicable)	i .				
Description: Inegral 18 MMscf/day Dehydration Unit					
Date of Installation: 2015 Annual Operating Hours:	Burner rating (MMbtu/hr):				
8,760	0.75 MMBtu/hr				
Exhaust Stack Height (ft): 40 Stack Diameter (ft): 1.9	Stack Temp. (°F): 1,637				
Glycol Type: TEG EG Other:					
Glycol Pump Type: 🗌 Electric 🖾 Gas If gas, what is the	volume ratio? <u>0.080</u> ACFM/gpm				
Condenser installed?  Yes No Exit Temp.	°F Condenser Pressurepsig				
Incinerator/flare installed? Xes No Destruction Eff.	<u>95_%</u>				
Other controls installed?  Yes  No Describe:					
Wet Gas <sup>2</sup> : Gas Temp.: <u>120</u> °F Gas Pressure <u>390</u> ps	ig				
(Upstream of Contact Tower) Saturated Gas? Xes No	If no, water content lb/MMSCF				
Dry Gas: Gas Flowrate(MMSCFD) Actual Design _18 MMscf/day					
(Downstream of Contact Tower) Water Content <u>7</u> lb/MMSCF					
Lean Glycol: Circulation rate (gpm) Actual <sup>3</sup> Maximum <sup>4</sup> <u>3.0 gal/lb H2O</u>					
Pump make/model: Kimray 20020SC					
Glycol Flash Tank (if applicable): Temp.: <u>150</u> °F Pressure <u>60</u> psig Vented? Yes 🗌 No 🔀					
If no, describe vapor control:					
Stripping Gas (if applicable):       Source of gas:       Dry Gas       Rate _39.984_ scfm					

<ul> <li>applicant provide th accomplished by su more detailed inform</li> <li>Extended gas analy Association (GPA) entrained liquids fro EPA Method TO-14</li> <li>3. GRI-GLYCalc Ver.</li> </ul>	<ul> <li>applicant provide this level of detail for all sources. The level of detail that is necessary is to establish where the custody transfer points are located. This can be accomplished by submitting a process flow diagram indicating custody transfer points and the natural gas flow. However, the DAQ reserves the right to request more detailed information in order to make the necessary decisions.</li> <li>Extended gas analysis from the Wet Gas Stream including mole percents of C<sub>1</sub>-C<sub>8</sub>, benzene, ethylbenzene, toluene, xylene and n-Hexane, using Gas Processors Association (GPA) 2286 (or similar). A sample should be taken from the inlet gas line, downstream from any inlet separator, and using a manifold to remove entrained liquids from the sample and a probe to collect the sample from the center of the gas line. GPA standard 2166 reference method or a modified version of EPA Method TO-14, (or similar) should be used.</li> <li>GRI-GLYCalc Ver. 3.0 aggregate report based on maximum Lean Glycol circulation rate and maximum throughput.</li> </ul>					
	Section C: Facility NESHAPS Subpart HH/HHH status Subject to Subpart HH – Benzene Exemption Claimed					
Affected facility	Subject to Subpart HHT     Benzene Exemption channed       Subject to Subpart HHH					
status:	$\Box$ Not Subject $\Box$ < 10/25 TPY					
(choose only one)	(choose only one) because: Affected facility exclusively handles black oil					
	$\Box$ The facility wide actual annual average NG throughput is < 650 thousand					
	scf/day and facility wide actual annual average hydrocarbon liquid is < 250 bpd					
	No affected source is present					

ATTACHMENT M

Air Pollution Control Device Sheet

# AIR POLLUTION CONTROL DEVICE Vapor Combustion Control Device Sheet

Complete this vapor combustion control device sheet for each enclosed combustion device, flare, thermal oxidizer, or completion combustion device that is located at the natural gas production pad for the purpose of thermally destructing waste gas to control emissions of regulated pollutants to the atmosphere.

IMPORTANT: READ THE INSTRUCTIONS ACCOMPANYING THIS FORM BEFORE COMPLETING.							
		General In	formation				
1. Control Device ID#: 2C       2. Installation Date: 2015       Xew							
3. Maximum Rated Total Flow 174,960 scf/			esign Heat Input: IMBtu/hr	5. Design 409 Bt		ntent:	
		Control Devi	ce Information				
6. Select the type	of vapor com	bustion control de	vice being used:	Enclosed C	ombustio	on Device	
Elevated Flare	e 🗌 Ground I	Flare 🕅 Therm	nal Oxidizer	Completion C	ombusti	on Device	
7. Manufacturer: Questor Tec Model No.: Q100	7. Manufacturer: Questor Technologies Inc.       8. Hours of operation per year:         8. Hours of operation per year:						
_	9. List the emission units whose emissions are controlled by this vapor combustion control device: Emission Units: DEHY02						
10. Emission Unit ID#	Emission So	ource Description	: Emission U	Emission Unit ID# Emi		Emission Source Description:	
DEHY02	Dehydra	ation Unit Still					
If this vapor combusto	or controls emi	issions from more	than six emission u	nits, please at	tach add	litional pages.	
11. Ass	ist Type		12. Flare Height	13. Tip Dia	ameter	14. Was the design per §60.18?	
Steam - Air - I	Pressure - 🛛	Non -	40 ft	23 in		Yes No	
Waste Gas Information							
15. Maximum waste gas flow rate (scfm):		ue of waste gas (BTU/ft3)	as17. Temperature of the emissions stream (°F)18. Exit Velocity of the emissions stream (ft/s)				
121.5 scfm	409	Btu/ft3	1,637 °F 47 ft/s		47 ft/s		
19. Provide an attachment with the characteristics of the waste gas stream to be burned.							

Pilot Information						
20. Type/Grade of pilot fuel:	21. Number of pilot lights:	22. Fuel flow rate to pilot flame per pilot (scf/hr):	23. Heat input per pilot (BTU/hr):	24. Will automatic re- ignition be used?		
Pipeline quality Natural Gas	1	~1,250 scf/hr	60,000 Btu/hr	🗌 Yes 🛛 No		
25. If automatic re-ignition will be used, describe the method: N/A						
26. Describe the met	thod of controlling flame:					
	e	e front and two (2) 2" flan	ne arrestors on the piping	g from the drip pot to the		
burner assembly.	••••• ••• •••• ••••• •••••	•••••••••••••••••••••••••••••••••••••••		5		
burner assembly.						
27. Is pilot flame equipped with a monitor to detect the presence of the flame?       28. If yes, what type? ∑ Thermocouple □ Infra-Red □ Ultra Violet         ∑ Yes □ No       Camera with monitoring control room □ Other, describe:						

29. Pollutant(s) Controlled	30. % Capture Efficiency	31. Manufacturer's Guaranteed Control Efficiency (%)					
HC	100	>95					
VOC	100	>95					
НАР	100	>95					
32. Has the control device been tested by the manufa	cturer and certified?						
Pending Testing							
33. Describe all operating ranges and maintenance pr	ocedures required by the manufact	urer to maintain warranty:					
See Attached							
34. Additional Information Attached? XES NO							
Please attach a copy of manufacturer's data sheet. Please attach a copy of manufacturer's drawing. Please attach a copy of the manufacturer's performance testing.							

#### Table M-1 Section 60.18 Demonstration

Craig					
Type Unassisted					
Throat Diameter (inches)	22.8				

		7290	scf/h
GLYCalc	INPUT	Compound Net	Mixture Net
	mole	Heating Value	Heating Value
<u>Compound</u>	percent	(Btu/scf)	(Btu/scf)
water	55.400	0	0.0
carbon dioxide	0.116	0	0.0
nitrogen	0.955	0	0.0
methane	30.200	913	275.7
ethane	5.360	1641	88.0
propane	2.370	2385	56.5
Isobutane	0.341	3105	10.6
n-butane	0.741	3113	23.1
Isopentane	0.231	3716	8.6
n-pentane	0.215	3709	8.0
cyclopentane	0.001	3516	0.0
n-hexane	0.063	4412	2.8
cyclohexane	0.053	4185	2.2
other hexanes	0.081	4870	3.9
heptane	0.175	4925	8.6
benzene	0.061	3601	2.2
toluene	0.295	4284	12.6
ethylbenzene	0.043	4977	2.2
xylene	1.760	4980	87.6
octane (C8+)	1.450	5804	84.2
hydrogen sulfide	0.000	596	0.0
TOTALS:	100		676.8

#### Assist gas requirements for nonassisted flare per 40 CFR 60.18(c)(3):

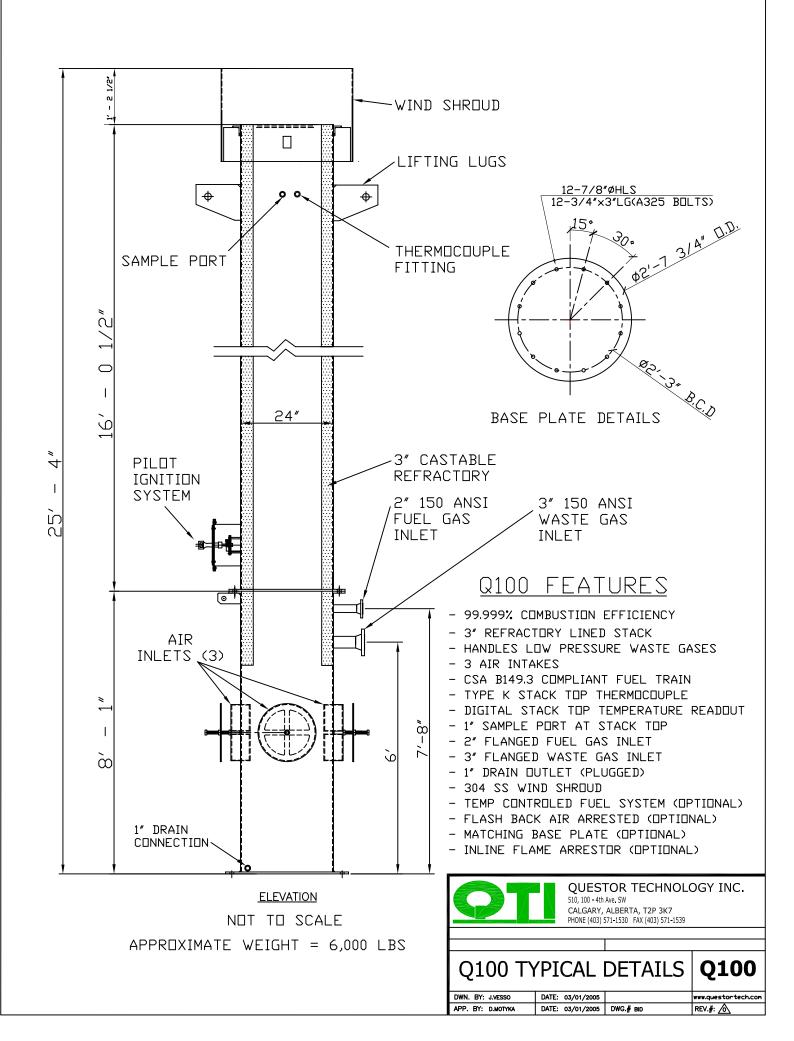
Minimum allowable net heating value	200	Btu/scf
Additional assist gas required	0.0	scfh
Assist (fuel) gas supplied	0	scfh
Composite net heating value	678.36	Btu/scf

#### Maximum allowable flare exit velocity ( $V_{max}$ ) for nonassisted flare per 40 CFR 60.18(f)(5):

Lower (Net) Heating Value	Btu/scf	MJ/scm
(1000 Btu/scf = 37.3 MJ/scm)	677	25.2
Vmax = 10^[(LHV+28.2)/31.7] for Vmax in m/sec and LHV in MJ/scm	m/sec	ft/sec
(1 m = 3.28 ft)	50.7	166.3
Vmax limit based on 40 CFR 60.18(b)(4)(iii)	50.7	166.3

Actual flare exit velocity:

Total volumetric flow (vent gas + assist gas in scfh/3600 sec/hr) =	2.03	scf/sec
Total volumetric flow at 180F & atmospheric pressure =	2.62	cf/sec
Flare exit cross-sectional area based on throat diameter =	2.84	ft2
Velocity = volumetric flow / cross-sectional area =	0.9	ft/sec





# **QUESTOR Q100 INCINERATOR**

# **TECHNICAL SPECIFICATIONS**

### Design Basis

Maximum throughput: Fuel requirement: Design operating temperature: 100,000 scf/d of methane equivalent gas (varies depending upon waste gas composition) 600 to 1200 °C

## **Questor Q100 Incinerator Detail**

Total height: Total weight: Foot print: Number of sections: Stack material: Stack OD: Stack Refractory I.D.: Stack length: Stack wall thickness: Air induction material: Air induction OD: Air induction length: Air induction wall thickness: Wind shroud: Flanges Bolting

25 ½ feet (7.7 meters) 6,000 lbs (2,120 kg) 2 feet  $-7\frac{3}{4}$  inch Dia (0.86 m Dia) 3 – Stack and air induction A36 - Refractory lined 24.0 inches (61 cm) 17.5 inches (44.5 cm) 16.0 feet (4.9 m) 0.25 inches (6.35 mm) A36 24 inches (61 cm) 8 feet -5 inches (2.5 m) 0.500 inches (12.7 mm) Stainless steel, 2 feet - 10 inches OD **A105 BWRF** A335

# **Refractory Specification**

Type: Thickness: Manufacturer: Maximum working temperature: 4LI 3 inches Rescocast 2600 °F 1427 °C

# Gas Supply Connections

Waste gas: Pilot gas: Fuel gas: 3 inch 150ANSI RFWN ¼ inch NPT 2 inch 150ANSI RFWN

Page 1 of 1



# **QUESTOR Q100 INCINERATOR**

# **TECHNICAL SPECIFICATIONS**

# **Combustion Air**

Natural draft:

3 openings c/w flame arrestor cells (Optional)

# **Pilot Gas Burner**

Pilot Ignition Control: Number of Igniters: Capacity at 3 psi:

Profire 1100, 1 34 m<sup>3</sup>/d

# Fuel Gas Burner

Operating Pressure Range: Manifold material:

5-7 psig Stainless steel 304

# Waste Gas Burner

Operating Pressure Range: Atmospheric Manifold material: Stainless steel 304

# Control Panel – (Solar Power Battery)

24 VDC controls NEMA 4, local control panel: Ignition panel:

# NEMA 4 x enclosure

# **Surface Preparation**

Sand blast: Top coat:

SP6 High temperature aluminum

Page 2 of 2



# QUESTOR Q100 INCINERATOR

# **TECHNICAL SPECIFICATIONS**

Optional Equipment	
Stack top temperature:	<ul> <li>2 – Alltemp Type K Thermocouple, Inconel 600</li> <li>&amp; Hastelloy X thermowell</li> <li>2 – Rosemount 644 Temperature Transmitters</li> </ul>
Air intake flame arrestors:	<ul> <li>3 – Circular wrapped corrugated aluminum flash</li> <li>Back arrestors 4" thick x 17" diameter</li> <li>1 – Zirco burner box housing flame arrestor</li> </ul>
Inline flame arrestor:	1 - 3" 150ANSI RF flanged, CS body, SS element Flame arrestor
Matching base plate:	$1 - \frac{1}{2}$ " x 2' 7 $\frac{3}{4}$ " plate with matching $\frac{7}{8}$ " bolt holes
Guy Wires	3 - ¾" x 100' guy wires

ATTACHMENT N

**Supporting Emission Calculations** 

# **Craig Compressor Station**

	Reboiler	Glycol Dehy	ТО	Total Emissions
Component	(tpy)	(tpy)	(tpy)	(tpy)
Criteria Pollutants				
NO <sub>X</sub>	4.84E-01		1.42	1.9
CO	4.06E-01		1.20	1.60
PM Total	3.67E-02		1.08E-01	0.14
PM <sub>10</sub> Total	3.67E-02		1.08E-01	0.14
PM <sub>2.5</sub> Total	3.67E-02			0.04
SO <sub>2</sub>	2.90E-03		8.54E-03	0.01
VOCs	2.66E-02	29.91		29.94
Greenhouse Gases				
$CO_2$	566		1,665	2,231
CH <sub>4</sub>	1.07E-02	20.32	3.14E-02	20.36
N <sub>2</sub> O	1.07E-03		3.14E-03	4.21E-03
CO <sub>2</sub> e	566	507.91	1,667	2,741
Hazardous Air Pollutants	1 165 07			1 145 07
Methylnaphthalene (2-) Methylchloranthrene (3-)	1.16E-07 8.70E-09			1.16E-07 8.70E-09
Dimethybenz(a)anthracene (7,12-)				
Acenaphthene	7.74E-08 8.70E-09			7.74E-08 8.70E-09
Acenaphthylene	8.70E-09 8.70E-09			8.70E-09 8.70E-09
Anthracene	8.70E-09 1.16E-08			1.16E-09
Benz(a)anthracene	8.70E-08			8.70E-08
Benzene	1.02E-05	2.00E-01		2.00E-01
Benzo(a)pyrene	5.80E-09	2.00E-01		5.80E-01
Benzo(b)fluoranthene	8.70E-09			8.70E-09
Benzo(g,h,i)perylene	5.80E-09			5.80E-09
Benzo(k)fluoranthene	8.70E-09			8.70E-09
Chrysene	8.70E-09			8.70E-09
Dibenzo(a,h)anthracene	5.80E-09			5.80E-09
Dichlorobenzene	5.80E-06			5.80E-06
Fluoranthene	1.45E-08			1.45E-08
Fluorene	1.35E-08			1.35E-08
Formaldehyde	3.63E-04			3.63E-04
Hexane, n-	8.70E-03	2.27E-01		2.36E-01
Indeno(1,2,3-cd)pyrene	8.70E-09			8.70E-09
Naphthalene	2.95E-06			2.95E-06
Phenanthrene	8.22E-08			8.22E-08
Pyrene	2.42E-08			2.42E-08
Toluene	1.64E-05	1.14		1.14
Arsenic	9.67E-07			9.67E-07
Beryllium	5.80E-08			5.80E-08
Cadmium	5.32E-06			5.32E-06
Chromium	6.77E-06			6.77E-06
Cobalt	4.06E-07			4.06E-07
Lead	2.42E-06		7.12E-06	9.54E-06
Manganese	1.84E-06			1.84E-06
Mercury	1.26E-06			1.26E-06
Nickel	1.02E-05			1.02E-05
Selenium	1.16E-07			1.16E-07
Ethylebenzene		1.93E-01		1.93E-01
Trimethylpentane (2,2,4-)		3.73E-01		3.73E-01
Xylene		7.82		7.82
Total HAP:	9.13E-03	9.95	7.12E-06	9.96

## Craig Compressor Station

Reboiler

Source Designation:	
Manufacturer:	Diverse Energy Systems
Year Installed	2015
Fuel Used:	Natural Gas
Higher Heating Value (HHV) (Btu/scf):	1,000
Heat Input (MMBtu/hr)	0.750
Fuel Consumption (mmscf/hr):	0.001
Potential Annual Hours of Operation (hr/yr):	8,760

#### Criteria and Manufacturer Specific Pollutant Emission Rates:

	Emission Factor	Potential Emissions		
Pollutant	(lb/MMscf) <sup>a</sup>	(lb/hr) <sup>b</sup>	(tons/yr) <sup>c</sup>	
NO <sub>x</sub>	100	1.10E-01	4.84E-01	
СО	84	9.27E-02	4.06E-01	
SO <sub>2</sub>	0.6	6.62E-04	2.90E-03	
PM Total	7.6	8.39E-03	3.67E-02	
PM Condensable	5.7	6.29E-03	2.76E-02	
PM <sub>10</sub> (Filterable)	1.9	2.10E-03	9.19E-03	
PM <sub>2.5</sub> (Filterable)	1.9	2.10E-03	9.19E-03	
VOC	5.5	6.07E-03	2.66E-02	
Lead	5.00E-04	5.52E-07	2.42E-06	
CO <sub>2</sub> <sup>d</sup>	116,997	129.17	565.74	
CH4 <sup>d</sup>	2.2	2.43E-03	1.07E-02	
$N_2O^d$	0.22	2.43E-04	1.07E-03	

#### Hazardous Air Pollutant (HAP) Potential Emissions:

	Emission Factor	Potential Emissions		
Pollutant	(lb/MMscf) <sup>a</sup>	(lb/hr) <sup>b</sup>	(tons/yr) <sup>c</sup>	
HAPs:				
Methylnaphthalene (2-)	2.40E-05	2.65E-08	1.16E-07	
3-Methylchloranthrene	1.80E-06	1.99E-09	8.70E-09	
7,12-Dimethylbenz(a)anthracene	1.60E-05	1.77E-08	7.74E-08	
Acenaphthene	1.80E-06	1.99E-09	8.70E-09	
Acenaphthylene	1.80E-06	1.99E-09	8.70E-09	
Anthracene	2.40E-06	2.65E-09	1.16E-08	
Benz(a)anthracene	1.80E-06	1.99E-09	8.70E-09	
Benzene	2.10E-03	2.32E-06	1.02E-05	
Benzo(a)pyrene	1.20E-06	1.32E-09	5.80E-09	
Benzo(b)fluoranthene	1.80E-06	1.99E-09	8.70E-09	
Benzo(g,h,i)perylene	1.20E-06	1.32E-09	5.80E-09	
Benzo(k)fluoranthene	1.80E-06	1.99E-09	8.70E-09	
Chrysene	1.80E-06	1.99E-09	8.70E-09	
Dibenzo(a,h) anthracene	1.20E-06	1.32E-09	5.80E-09	
Dichlorobenzene	1.20E-03	1.32E-06	5.80E-06	
Fluoranthene	3.00E-06	3.31E-09	1.45E-08	
Fluorene	2.80E-06	3.09E-09	1.35E-08	
Formaldehyde	7.50E-02	8.28E-05	3.63E-04	
Hexane	1.80E+00	1.99E-03	8.70E-03	
Indo(1,2,3-cd)pyrene	1.80E-06	1.99E-09	8.70E-09	
Naphthalene	6.10E-04	6.73E-07	2.95E-06	
Phenanthrene	1.70E-05	1.88E-08	8.22E-08	
Pyrene	5.00E-06	5.52E-09	2.42E-08	
Toluene	3.40E-03	3.75E-06	1.64E-05	
Arsenic	2.00E-04	2.21E-07	9.67E-07	
Beryllium	1.20E-05	1.32E-08	5.80E-08	
Cadmium	1.10E-03	1.21E-06	5.32E-06	
Chromium	1.40E-03	1.55E-06	6.77E-06	
Cobalt	8.40E-05	9.27E-08	4.06E-07	
Manganese	3.80E-04	4.20E-07	1.84E-06	
Mercury	2.60E-04	2.87E-07	1.26E-06	
Nickel	2.10E-03	2.32E-06	1.02E-05	
Selenium	2.40E-05	2.65E-08	1.16E-07	
Total HAP		2.08E-03	9.13E-03	

<sup>a</sup> Emission factors from AP-42 Section 1.4 "Natural Gas Combustion" Tables 1.4-1, 1.4-2, 1.4-3, & 1.4-4.

<sup>b</sup> Emission Rate (lb/hr) = Rated Capacity (MMscf/hr) × Emission Factor (lb/MMscf).

<sup>c</sup> Annual Emissions (tons/yr)<sub>Potential</sub> = (lb/hr)<sub>Emissions</sub>× (Maximum Allowable Operating Hours, 8760 hr/yr) × (1 ton/2000 lb). <sup>d</sup> GHG Emission factors from Tables C-1 and C-2, 40 CFR 98, Subpart C.

 $Emission \ Rate \ (lb/hr) = Rated \ Capacity \ (MMscf/hr) \times Emission \ Factor \ from \ Subpart \ C \ (kg/MMBtu) \times (2.205 \ lb/kg) \times HHV \ (Btu/scf) \ Subpart \ C \ (kg/MMBtu) \times (2.205 \ lb/kg) \times HHV \ (Btu/scf) \ Subpart \ C \ (kg/MMBtu) \times (2.205 \ lb/kg) \times HHV \ (Btu/scf) \ Subpart \ C \ (kg/MMBtu) \times (2.205 \ lb/kg) \times HHV \ (Btu/scf) \ Subpart \ C \ (kg/MMBtu) \times (2.205 \ lb/kg) \times HHV \ (Btu/scf) \ Subpart \ C \ (kg/MMBtu) \times (2.205 \ lb/kg) \times HHV \ (Btu/scf) \ Subpart \ C \ (kg/MMBtu) \ Subpart \ C \ (kg/MMBtu) \ Subpart \ C \ (kg/MMBtu) \ Subpart \ Subpart$ 

## Thermal Oxidizer (2C) Emissions Calculations:

Combustor Rating	3.2 MMBtu/hr
Pilot Rating	0.06 MMBtu/hr
Higher Heating Value (HHV)	1,000 Btu/scf

	Emission		oustor	Pi			<b>FAL</b>
Pollutant	Factors <sup>a</sup> (lb/MMBtu)	Potential (lb/hr)	Emissions (tpy)	Potential (lb/hr)	Emissions (tpy)	Potential (lb/hr)	Emissions (tpy)
NO <sub>x</sub>	0.100	3.19E-01	1.40E+00	6.00E-03	2.63E-02	3.25E-01	1.42E+00
СО	0.084	2.68E-01	1.17E+00	5.04E-03	2.21E-02	2.73E-01	1.20E+00
PM/PM <sub>10</sub>	0.008	2.42E-02	1.06E-01	4.56E-04	2.00E-03	2.47E-02	1.08E-01
$SO_2$	0.0006	1.91E-03	8.38E-03	3.60E-05	1.58E-04	1.95E-03	8.54E-03
Lead	5.00E-07	1.60E-06	6.99E-06	3.00E-08	1.31E-07	1.63E-06	7.12E-06
CO <sub>2</sub> <sup>b</sup>	116.997	373.2	1,634.7	7.0	30.7	380.2	1,665.5
CH4 <sup>b</sup>	0.002	7.03E-03	3.08E-02	1.32E-04	5.79E-04	7.17E-03	3.14E-02
$N_2O^{b}$	0.000	7.03E-04	3.08E-03	1.32E-05	5.79E-05	7.17E-04	3.14E-03

<sup>a</sup> Emission factors from AP-42 Section 1.4 "Natural Gas Combustion" Tables 1.4-1, 1.4-2.

<sup>b</sup> GHG Emission factors from Tables C-1 and C-2, 40 CFR 98, Subpart C.

#### Glycol Dehydrator Emission Calculations - GLY-CALC Output<sup>1</sup>

#### **GRI-GLYCalc Version 4.0 - EMISSIONS SUMMARY**

Regenerator Emissions (Controlled)				
Pollutant	(lbs/hr)	(lbs/day)	(tons/yr)	
Methane	3.8654	92.770	16.9305	
Ethane	1.2874	30.898	5.6388	
Propane	0.8360	20.064	3.6617	
Isobutane	0.1580	3.792	0.6920	
n-Butane	0.3438	8.251	1.5058	
Isopentane	0.1328	3.187	0.5817	
n-Pentane	0.1239	2.974	0.5427	
Cyclopentane	0.0004	0.010	0.0018	
n-Hexane*	0.0432	1.037	0.1892	
Cyclohexane	0.0358	0.859	0.1568	
Other Hexanes	0.0558	1.339	0.2444	
Heptanes	0.1402	3.365	0.6141	
Methylcyclohexane	0.0013	0.031	0.0057	
2,2,4-Trimethylpentane*	0.0709	1.702	0.3105	
Benzene*	0.0381	0.914	0.1669	
Toluene*	0.2171	5.210	0.9509	
Ethylbenzene*	0.0368	0.883	0.1612	
Xylenes*	1.4878	35.707	6.5166	
C8 + Heavier Hydrocarbons	1.9686	47.246	8.6225	
Total Emissions	10.8433	260.24	47.494	
Total Hydrocarbon Emissions	10.8433	260.24	47.494	
Total VOC Emissions	5.6905	136.57	24.924	
Total HAP Emissions	1.8939	45.45	8.295	

#### GRI-GLYCalc Version 4.0 - EMISSIONS SUMMARY

Controlled Total Emission Rates (w/ safety factor)

Pollutant	(lbs/hr)	(lbs/day)	(tons/yr)
Methane	4.6385	111.3235	20.3165
Ethane	1.5449	37.0771	6.7666
Propane	1.0032	24.0768	4.3940
Isobutane	0.1896	4.5504	0.8304
n-Butane	0.4126	9.9014	1.8070
Isopentane	0.1594	3.8246	0.6980
n-Pentane	0.1487	3.5683	0.6512
Cyclopentane	0.0005	0.0115	0.0021
n-Hexane*	0.0518	1.2442	0.2271
Cyclohexane	0.0430	1.0310	0.1882
Other Hexanes	0.0670	1.6070	0.2933
Heptanes	0.1682	4.0378	0.7369
Methylcyclohexane	0.0016	0.0374	0.0068
2,2,4-Trimethylpentane*	0.0851	2.0419	0.3727
Benzene*	0.0457	1.0973	0.2003
Toluene*	0.2605	6.2525	1.1411
Ethylbenzene*	0.0442	1.0598	0.1934
Xylenes*	1.7854	42.8486	7.8199
C8 + Heavier Hydrocarbons	2.3623	56.6957	10.3470
Total Emissions	13.0120	312.29	56.992
Total Hydrocarbon Emissions	13.0120	312.29	56.992
Total VOC Emissions	6.8286	163.89	29.909
Total HAP Emissions	2.2727	54.54	9.954

<sup>\*</sup> HAPs

1. Based on GRI GlyCalc 4.0 run at dry gas flowrate of 18 MMscf/day and T and P of 120°F and 390 psig, respectively, controlled by a TO at 95% destruction efficiency

A safety factor of 20% is included in the total.

#### GRI-GLYCalc Version 4.0 - EMISSIONS SUMMARY

Flash Tank Emissions (Recycle/Recompression)

Pollutant	(lbs/hr)	(lbs/day)	(tons/y
Methane		0.00	0.000
Ethane		0.00	0.000
Propane		0.00	0.000
Isobutane		0.00	0.000
n-Butane		0.00	0.000
Isopentane		0.00	0.000
n-Pentane		0.00	0.000
Cyclopentane		0.00	0.000
n-Hexane*		0.00	0.00
Cyclohexane		0.00	0.000
Other Hexanes		0.00	0.000
Heptanes		0.00	0.000
Methylcyclohexane		0.00	0.000
2,2,4-Trimethylpentane*		0.00	0.000
Benzene*		0.00	0.000
Toluene*		0.00	0.000
Ethylbenzene*		0.00	0.00
Xylenes*		0.00	0.00
C8 + Heavier Hydrocarbons		0.00	0.00
Total Emissions	0.0000	0.00	0.000
Total Hydrocarbon Emissions	0.0000	0.00	0.000
Total VOC Emissions	0.0000	0.00	0.000
Total HAP Emissions	0.0000	0.00	0.000

#### Glycol Dehydrator Emission Calculations - GLY-CALC Output<sup>1</sup>

#### **GRI-GLYCalc Version 4.0 - EMISSIONS SUMMARY**

#### Regenerator Emissions (Uncontrolled)

Pollutant	(lbs/hr)	(lbs/day)	(tons/yr)
Methane	77.3078	1855.39	338.608
Ethane	25.7488	617.97	112.780
Propane	16.7191	401.26	73.230
Isobutane	3.1606	75.85	13.843
n-Butane	6.8751	165.00	30.113
Isopentane	2.6559	63.74	11.633
n-Pentane	2.4779	59.47	10.853
Cyclopentane	0.0086	0.21	0.038
n-Hexane*	0.8637	20.73	3.783
Cyclohexane	0.7156	17.17	3.134
Other Hexanes	1.1162	26.79	4.889
Heptanes	2.8035	67.28	12.279
Methylcyclohexane	0.0250	0.60	0.110
2,2,4-Trimethylpentane*	1.4177	34.02	6.210
Benzene*	0.7616	18.28	3.336
Toluene*	4.3412	104.19	19.014
Ethylbenzene*	0.7350	17.64	3.219
Xylenes*	29.7566	714.16	130.334
C8 + Heavier Hydrocarbons	39.3729	944.95	172.453
Total Emissions	216.8628	5204.71	949.859
Total Hydrocarbon Emissions	216.8628	5204.71	949.859
Total VOC Emissions	113.8062	2731.35	498.471
Total HAP Emissions	37.8758	909.02	165.896

#### Flash Tank Off Gas Emissions Pollutant (lbs/hr) (lbs/day) (tons/yr) Methane 37.1354 891.25 162.653 Ethane 14.9760 359.42 65.595 47.547 10.8554 260 53 Propane Isobutane 2.2001 52.80 9.636 n-Butane 5.0045 120.11 21.920 Isopentane 1.9284 46.28 8.446 1.8375 44.10 n-Pentane 8.048 0.0042 0.018 Cyclopentane 0.10 n-Hexane\* 0.5974 14.34 2.617 Cyclohexane 0.2348 1.028 5.64 Other Hexanes 0.8102 19.44 3.549 1.4711 Heptanes 35.31 6.443 Methylcyclohexane 0.0069 0.17 0.030 2,2,4-Trimethylpentane\* 0.9455 22.69 4.141 0.0450 Benzene\* 1.08 0.197 Toluene\* 0.1752 4.20 0.767 Ethylbenzene\* 0.0180 0.43 0.079 Xylenes\* 0.5091 12.22 2.230 C8 + Heavier Hydrocarbons 4.2507 102.02 18.618 Total Emissions 83.0054 1992.13 363.564 Total Hydrocarbon Emissions 83.0054 1992.13 363.564 Total VOC Emissions 30.8940 741.46 135.316 Total HAP Emissions 2.2902 54.96 10.031

GRI-GLYCalc Version 4.0 - EMISSIONS SUMMARY

#### GRI-GLYCalc Version 4.0 - EMISSIONS SUMMARY

Controlled Total Emission Rates (w/ safety factor)

Pollutant	(lbs/hr)	(lbs/day)	(tons/yr)
Methane	137.3318	3295.9642	601.5135
Ethane	48.8698	1172.8742	214.0495
Propane	33.0894	794.1456	144.9316
Isobutane	6.4328	154.3882	28.1758
n-Butane	14.2555	342.1325	62.4392
Isopentane	5.5012	132.0278	24.0951
n-Pentane	5.1785	124.2835	22.6817
Cyclopentane	0.0154	0.3686	0.0673
n-Hexane*	1.7533	42.0797	7.6795
Cyclohexane	1.1405	27.3715	4.9953
Other Hexanes	2.3117	55.4803	10.1252
Heptanes	5.1295	123.1085	22.4673
Methylcyclohexane	0.0383	0.9187	0.1677
2,2,4-Trimethylpentane*	2.8358	68.0602	12.4210
Benzene*	0.9679	23.2301	4.2395
Toluene*	5.4197	130.0723	23.7382
Ethylbenzene*	0.9036	21.6864	3.9578
Xylenes*	36.3188	871.6522	159.0765
C8 + Heavier Hydrocarbons	52.3483	1256.3597	229.2856
Total Emissions	359.8418	8636.20	1576.107
Total Hydrocarbon Emissions	359.8418	8636.20	1576.107
Total VOC Emissions	173.6402	4167.37	760.544
Total HAP Emissions	48.1992	1156.78	211.112

#### \* HAPs

1. Based on GRI GlyCalc 4.0 run at dry gas flowrate of 18 MMscf/day and T and P of 120°F and 390 psig, respectively, controlled by a TO at 95% destruction efficiency. A safety factor of 20% is included in the total.

Pollutant	New Units (tpy)	Existing Units <sup>1</sup> (tpy)	∆ PTE (tpy)
NOX	1.9	1.9	0
CO	1.6	1.6	0
PM Total	1.45E-01	1.45E-01	0
PM10 Total	1.45E-01	1.45E-01	0
PM2.5 Total	3.67E-02	3.67E-02	0
SO2	1.14E-02	1.14E-02	0
VOCs	29.9	38.4	-8
HAPS	10.0	13.7	-4

1. Based on GRI GlyCalc 4.0 run at dry gas flowrate of 25 MMscf/day and T and P of 120°F and 390 psig, respectively, controlled by a TO at 95% destruction efficiency. A safety factor of 20% is included in the total.

Case Name: Craig Compressor Station File Name: W:\Dominion\WV - Craig Deep Valley Yellow Creek\153902 0022 Dominion WV Dehy Project\04 Deliverables\Craig\Attachment N - Emission Calculations\Craig Station 1010am.ddf Date: March 21, 2015 DESCRIPTION: \_\_\_\_\_ Description: 18MMScf/day new TEG dehydrator Annual Hours of Operation: 8760.0 hours/yr WET GAS: \_\_\_\_\_ Temperature: 120.00 deg. F Pressure: 390.00 psig Wet Gas Water Content: Saturated Component Conc. (vol %) ----- ----- 
 Carbon Dioxide
 0.2390

 Nitrogen
 2.3860

 Methane
 75.3510

 Ethane
 12.9530

 Propane
 5.3710
 Isobutane 0.7230 n-Butane 1.4720 Isopentane 0.4450 n-Pentane 0.3830 Cyclopentane 0.0005 n-Hexane 0.0840 Cyclohexane 0.0200 Other Hexanes 0.1270 Heptanes 0.1400 Methylcyclohexane 0.0005 2,2,4-Trimethylpentane 0.1070 Benzene 0.0030 Toluene 0.0100 Ethylbenzene 0.0010 Xylenes 0.0310 C8+ Heavies 0.1540 DRY GAS: \_\_\_\_\_ Flow Rate: 18.0 MMSCF/day Water Content: 7.0 lbs. H2O/MMSCF LEAN GLYCOL: Glycol Type: TEG Water Content: 1.0 wt% H2O Recirculation Ratio: 3.0 gal/lb H2O

GRI-GLYCalc VERSION 4.0 - SUMMARY OF INPUT VALUES

Page: 1

#### -----

Glycol Pump Type: Gas Injection Gas Injection Pump Volume Ratio: 0.080 acfm gas/gpm glycol

FLASH TANK:

\_\_\_\_\_

Flash Control: Recycle/recompression Temperature: 150.0 deg. F Pressure: 60.0 psig

STRIPPING GAS:

Source of Gas: Dry Gas Gas Flow Rate: 39.984 scfm

REGENERATOR OVERHEADS CONTROL DEVICE:

Control Device:	Combustion Device
Destruction Efficiency:	95.0 %
Excess Oxygen:	0.0 %
Ambient Air Temperature:	0.0 deg. F

Page: 1

GRI-GLYCalc VERSION 4.0 - AGGREGATE CALCULATIONS REPORT

Case Name: Craig Compressor Station File Name: P:\Craig Station\_1010am.ddf Date: March 13, 2015

#### DESCRIPTION:

Description: 18MMScf/day new TEG dehydrator

Annual Hours of Operation: 8760.0 hours/yr

EMISSIONS REPORTS:

#### CONTROLLED REGENERATOR EMISSIONS

Component	lbs/hr	lbs/day	tons/yr
Methane	3.8654	92.769	16.9304
Ethane	1.2874	30.899	5.6390
Propane	0.8360	20.063	3.6615
Isobutane	0.1580	3.793	0.6922
n-Butane	0.3438	8.250	1.5057
Isopentane	0.1328	3.187	0.5817
n-Pentane	0.1239	2.973	0.5427
Cyclopentane	0.0004	0.010	0.0019
n-Hexane	0.0432	1.036	0.1892
Cyclohexane	0.0358	0.859	0.1567
Other Hexanes	0.0558	1.339	0.2444
Heptanes	0.1402	3.364	0.6140
Methylcyclohexane	0.0013	0.030	0.0055
2,2,4-Trimethylpentane	0.0709	1.701	0.3105
Benzene	0.0381	0.914	0.1668
Toluene	0.2171	5.209	0.9507
Ethylbenzene	0.0368	0.882	0.1610
Xylenes	1.4878	35.708	6.5167
C8+ Heavies	1.9686	47.248	8.6227
Total Emissions	10.8432	260.236	47.4930
Total Hydrocarbon Emissions	10.8432	260.236	47.4930
Total VOC Emissions	5.6903	136.568	24.9236
Total HAP Emissions	1.8938	45.451	8.2948
Total BTEX Emissions	1.7797	42.713	7.7952

#### UNCONTROLLED REGENERATOR EMISSIONS

Component	lbs/hr	lbs/day	tons/yr
Methane	77.3078	1855.388	338.6083
Ethane	25.7488	617.972	112.7798
Propane	16.7191	401.258	73.2295
Isobutane	3.1606	75.854	13.8433
n-Butane	6.8751	165.003	30.1131
	0 6550	<b>60 5 1 0</b>	
Isopentane	2.6559	63.743	11.6331
n-Pentane	2.4779	59.469	10.8531
Cyclopentane	0.0086	0.207	0.0379
n-Hexane	0.8637	20.729	3.7831
Cyclohexane	0.7156	17.174	3.1343

Page: 2

Other Hexanes	1.1162	26.789	4.8890
Heptanes	2.8035	67.285	12.2795
Methylcyclohexane	0.0250	0.601	0.1096
2,2,4-Trimethylpentane	1.4177	34.025	6.2096
Benzene	0.7616	18.279	3.3359
Toluene	4.3412	104.188	19.0144
Ethylbenzene	0.7350	17.640	3.2193
Xylenes	29.7566	714.159	130.3340
C8+ Heavies	39.3729	944.950	172.4534
Total Emissions	216.8630	5204.713	949.8601
Total Hydrocarbon Emissions	216.8630	5204.713	949.8601
Total VOC Emissions	113.8064	2731.354	498.4720
Total HAP Emissions	37.8759	909.021	165.8963
Total BTEX Emissions	35.5944	854.266	155.9036

FLASH GAS EMISSIONS

\_\_\_\_\_

Note: Flash Gas Emissions are zero with the Recycle/recompression control option.

FLASH TANK OFF GAS

Component	lbs/hr	lbs/day	tons/yr
Methane	37.1354	891.251	162.6532
Ethane	14.9760	359.423	65.5947
Propane	10.8554	260.529	47.5466
Isobutane	2.2001	52.803	9.6366
n-Butane	5.0045	120.108	21.9197
Isopentane	1.9284	46.282	8.4465
n-Pentane	1.8375	44.099	8.0481
Cyclopentane	0.0042	0.100	0.0183
n-Hexane	0.5974	14.337	2.6165
Cyclohexane	0.2348	5.636	1.0286
Other Hexanes	0.8102	19.445	3.5488
Heptanes	1.4711	35.306	6.4433
Methylcyclohexane	0.0069	0.165	0.0301
2,2,4-Trimethylpentane	0.9455	22.692	4.1412
Benzene	0.0450	1.080	0.1972
Toluene	0.1752	4.204	0.7672
Ethylbenzene	0.0180	0.432	0.0789
Xylenes	0.5091	12.219	2.2299
C8+ Heavies	4.2507	102.017	18.6182
Total Emissions	83.0054	1992.130	363.5637
Total Hydrocarbon Emissions	83.0054	1992.130	363.5637
Total VOC Emissions	30.8940	741.456	135.3157
Total HAP Emissions	2.2902	54.964	10.0309
Total BTEX Emissions	0.7473	17.935	3.2732

EQUIPMENT REPORTS:

# COMBUSTION DEVICE Ambient Temperature: 0.00 deg. F Excess Oxygen: 0.00 % Combustion Efficiency: 95.00 % Supplemental Fuel Requirement: 9.89e-001 MM BTU/hr Component Emitted Destroyed Methane 5.00% 95.00% Propane 5.00% 95.00% Isobutane 5.00% 95.00% n-Butane 5.00% 95.00% Nethane 5.00% 95.00% n-Butane 5.00% 95.00% n-Pentane 5.00% 95.00% Cyclopentane 5.00% 95.00% Cyclohexane 5.00% 95.00% Methylcyclohexane 5.00% 95.00% Leptanes 5.00% 95.00% Methylcyclohexane 5.00% 95.00% Ehrylbenzene 5.00% 95.00% Ethylbenzene 5.00% 95.00% Cyclohexane 5.00% 95.00% Cyclohexane 5.00% 95.00% C8+ Heavies<

#### ABSORBER

Calculated Absorber Stages: 1.85 Specified Dry Gas Dew Point: 7.00 lbs. H2O/MMSCF Temperature: 120.0 deg. F Pressure: 390.0 psig Dry Gas Flow Rate: 18.0000 MMSCF/day Glycol Losses with Dry Gas: 0.3231 lb/hr Wet Gas Water Content: Saturated Calculated Wet Gas Water Content: 218.49 lbs. H2O/MMSCF Specified Lean Glycol Recirc. Ratio: 3.00 gal/lb H2O

Component	Remaining in Dry Gas	Absorbed in Glycol
Water	3.19%	96.81%
Carbon Dioxide	99.75%	0.25%
Nitrogen	99.98%	0.02%
Methane	99.98%	0.02%
Ethane	99.93%	0.02%
Propane	99.87%	0.13%
Isobutane	99.81%	0.19%
n-Butane	99.75%	0.25%
Isopentane	99.73%	0.27%
n-Pentane	99.67%	0.33%
Cyclopentane	98.60%	1.40%
n-Hexane	99.43%	0.57%
Cyclohexane	97.59%	2.41%
Other Hexanes	99.57%	0.43%
Heptanes	98.91%	1.09%

		Page:	4
Methylcyclohexane	97.16%	2.84%	
2,2,4-Trimethylpentane	99.48%	0.52%	
Benzene	83.00%	17.00%	
Toluene	75.60%	24.40%	
Ethylbenzene	64.48%	35.52%	
Xylenes	53.81%	46.19%	
C8+ Heavies	92.02%	7.98%	

FLASH TANK

Flash Control: Flash Temperature: Flash Pressure:	150	/recompression .0 deg. F .0 psig
	ft in Glycol	Removed in Flash Gas
Water Carbon Dioxide Nitrogen Methane Ethane	99.83% 18.80% 2.16% 2.27% 6.99%	
Propane	13.91%	86.09%
Isobutane	18.73%	81.27%
n-Butane	22.78%	77.22%
Isopentane	24.88%	75.12%
n-Pentane	28.84%	71.16%
Cyclopentane	60.83%	39.17%
n-Hexane	40.84%	59.16%
Cyclohexane	73.10%	26.90%
Other Hexanes	35.00%	65.00%
Heptanes	56.88%	43.12%
Methylcyclohexane	77.09%	22.91%
2,2,4-Trimethylpentane	41.39%	58.61%
Benzene	94.61%	5.39%
Toluene	96.39%	3.61%
Ethylbenzene	97.84%	2.16%
Xylenes	98.53%	1.47%
C8+ Heavies	91.10%	8.90%

REGENERATOR

\_ \_ \_

Regenerator Stripping Gas: Dry Product Gas Stripping Gas Flow Rate: 39.9840 scfm Component Water 21.83% 78.17% Carbon Dioxide 0.00% 100.00% Nitrogen 0.00% 100.00% Methane 0.00% 100.00%

Ethane0.00%100.00%Propane0.00%100.00%Isobutane0.00%100.00%n-Butane0.00%100.00%Isopentane1.33%98.67%

n-Pentane	1.23%	Page: 98.77%	5
Cyclopentane	0.75%	99.25%	
n-Hexane	0.99%	99.01%	
Cyclohexane	4.15%	95.85%	
Other Hexanes	2.18%	97.82%	
Heptanes	0.78%	99.22%	
Methylcyclohexane	4.96%	95.04%	
2,2,4-Trimethylpentane	2.88%	97.12%	
Benzene	5.24%	94.76%	
Toluene	8.16%	91.84%	
Ethylbenzene	10.60%	89.40%	
Xylenes	13.08%	86.92%	
C8+ Heavies	12.99%	87.01%	

STREAM REPORTS:

WET GAS STREAM

Temperature: 120.00 deg. F		
Pressure: 404.70 psia Flow Rate: 7.54e+005 scfh		
Flow Rate: 7.54e+005 scfh		
Component	Conc.	Loading
-	(vol%)	Loading (lb/hr)
Water	4.60e-001	1.65e+002
Carbon Dioxide		
	2.38e+000	
	7.50e+001	
	1.29e+001	
Propane	5.35e+000	4.69e+003
	7.20e-001	
	1.47e+000	
Isopentane		
	3.81e-001	
Cyclopentane	4 980-004	6 940-001
	8.36e-002	
Cyclohexane		
Other Hexanes		
	1.39e-001	
Methylcyclohexane	4 980-004	9 710-001
2,2,4-Trimethylpentane		
	2.99e-003	
	9.95e-003	
Ethylbenzene		
EchytDelizelle	2.358-004	2.100+000
Xylenes	3.09e-002	6.51e+001
C8+ Heavies	1.53e-001	5.19e+002
Total Components	100.00	4.32e+004
-		

DRY GAS STREAM

Temperature: 120.00 deg. F Pressure: 404.70 psia Flow Rate: 7.50e+005 scfh

Component	Conc. (vol%)	Loading (lb/hr)
Carbon Dioxide Nitrogen Methane	1.47e-002 2.39e-001 2.39e+000 7.54e+001 1.30e+001	2.08e+002 1.32e+003 2.39e+004
Isobutane n-Butane Isopentane	5.37e+000 7.22e-001 1.47e+000 4.44e-001 3.82e-001	8.30e+002 1.69e+003 6.33e+002
Cyclohexane Other Hexanes	8.36e-002 1.95e-002	1.42e+002 3.25e+001 2.16e+002
	1.07e-001 2.49e-003 7.56e-003	2.41e+002 3.85e+000 1.38e+001
Xylenes C8+ Heavies Total Components		

LEAN GLYCOL STREAM

Temperature: 120.00 deg. F Flow Rate: 7.91e+000 gpm		
Component	Conc. (wt%)	Loading (lb/hr)
Water Carbon Dioxide Nitrogen	9.88e+001 9.99e-001 1.18e-012 6.64e-013 3.92e-018	4.45e+001 5.25e-011 2.96e-011
Propane Isobutane	5.86e-008 5.65e-009 1.06e-009 2.32e-009 1.90e-004	2.52e-007 4.70e-008 1.03e-007
Cyclopentane	9.13e-005 5.94e-004	4.87e-005 4.07e-003 2.65e-002
Methylcyclohexane 2,2,4-Trimethylpentane Benzene		1.15e-003 1.92e-002 4.15e-002
Ethylbenzene Xylenes C8+ Heavies	1.00e-001	4.46e+000

RICH GLYCOL AND PUMP GAS STREAM Temperature: 120.00 deg. F Pressure: 404.70 psia Pressure: 404.70 psia Flow Rate: 8.59e+000 gpm NOTE: Stream has more than one phase. Component Conc. Loading (wt%) (lb/hr) TEG 9.19e+001 4.39e+003 Water 4.27e+000 2.04e+002 Carbon Dioxide 1.70e-002 8.11e-001 Nitrogen 4.41e-002 2.11e+000 Methane 7.95e-001 3.80e+001 Ethane 3.37e-001 1.61e+001 Propane 2.64e-001 1.26e+001 Isobutane 5.67e-002 2.71e+000 n-Butane 1.36e-001 6.48e+000 Isopentane 5.37e-002 2.57e+000 n-Pentane 5.40e-002 2.58e+000 Cyclopentane 2.24e-004 1.07e-002 n-Hexane 2.11e-002 1.01e+000 Cyclohexane 1.83e-002 8.73e-001 Other Hexanes 2.61e-002 1.25e+000 Heptanes 7.14e-002 3.41e+000 Methylcyclohexane 6.29e-004 3.00e-002 2,2,4-Trimethylpentane 3.38e-002 1.61e+000 Benzene 1.75e-002 8.36e-001 Toluene 1.02e-001 4.85e+000 Ethylbenzene 1.75e-002 8.35e-001 Xylenes 7.25e-001 3.46e+001 C8+ Heavies 9.99e-001 4.77e+001 ----- ------Total Components 100.00 4.78e+003

FLASH TANK OFF GAS STREAM

Pressure:	150.00 deg. F 74.70 psia 1.30e+003 scfh			
	Component		Loading (lb/hr)	
	Carbon Dioxide Nitrogen Methane	5.60e-001 4.38e-001 2.16e+000 6.77e+001 1.46e+001	6.58e-001 2.06e+000 3.71e+001	
	Isobutane n-Butane Isopentane	7.20e+000 1.11e+000 2.52e+000 7.82e-001 7.45e-001	2.20e+000 5.00e+000 1.93e+000	
	Cyclopentane n-Hexane	1.75e-003 2.03e-001		

Page: 8 Cyclohexane 8.16e-002 2.35e-001 Other Hexanes 2.75e-001 8.10e-001 Heptanes 4.29e-001 1.47e+000 Methylcyclohexane 2.05e-003 6.88e-003 2,2,4-Trimethylpentane 2.42e-001 9.45e-001 Benzene 1.69e-002 4.50e-002 Toluene 5.56e-002 1.75e-001 Ethylbenzene 4.96e-003 1.80e-002 Xylenes 1.40e-001 5.09e-001 C8+ Heavies 7.30e-001 4.25e+000 \_\_\_\_\_ \_\_\_\_\_ Total Components 100.00 8.61e+001 FLASH TANK GLYCOL STREAM Temperature: 150.00 deg. F Flow Rate: 8.40e+000 gpm Conc. Loading (wt%) (lb/hr) Component \_\_\_\_\_ TEG 9.36e+001 4.39e+003 Water 4.35e+000 2.04e+002 Carbon Dioxide 3.25e-003 1.52e-001 Nitrogen 9.69e-004 4.55e-002 Methane 1.84e-002 8.63e-001 Ethane 2.40e-002 1.13e+000 Propane 3.74e-002 1.75e+000 Isobutane 1.08e-002 5.07e-001 n-Butane 3.15e-002 1.48e+000 Isopentane 1.36e-002 6.39e-001 n-Pentane 1.59e-002 7.45e-001 Cyclopentane 1.39e-004 6.50e-003 n-Hexane 8.79e-003 4.12e-001 Cyclohexane 1.36e-002 6.38e-001 Other Hexanes 9.30e-003 4.36e-001 Heptanes 4.14e-002 1.94e+000 Methylcyclohexane 4.94e-004 2.32e-002 2,2,4-Trimethylpentane 1.42e-002 6.68e-001 Benzene 1.69e-002 7.91e-001 Toluene 9.97e-002 4.68e+000 Ethylbenzene 1.74e-002 8.17e-001 Xvlenes 7.27e-001 3.41e+001 C8+ Heavies 9.27e-001 4.35e+001 Total Components 100.00 4.69e+003 FLASH GAS EMISSIONS \_\_\_\_\_ Control Method: Recycle/recompression Control Efficiency: 100.00 Note: Flash Gas Emissions are zero with the Recycle/recompression control option.

REGENERATOR OVERHEADS STREAM

-----

Temperature: 212.00 deg. F

Pressure: 14.70 psia Flow Rate: 6.06e+003 scfh

Component	Conc. (vol%)	Loading (lb/hr)
Carbon Dioxide Nitrogen Methane	5.54e+001 1.16e-001 9.55e-001 3.02e+001 5.36e+000	8.16e-001 4.27e+000 7.73e+001
Isobutane n-Butane Isopentane	2.37e+000 3.41e-001 7.41e-001 2.31e-001 2.15e-001	3.16e+000 6.88e+000 2.66e+000
Cyclohexane Other Hexanes	6.28e-002 5.33e-002	8.64e-001 7.16e-001 1.12e+000
	7.77e-002 6.11e-002 2.95e-001	1.42e+000 7.62e-001 4.34e+000
Xylenes C8+ Heavies Total Components		

COMBUSTION DEVICE OFF GAS STREAM

\_

Temperature:1000.00 deg. FPressure:14.70 psiaFlow Rate:1.32e+002 scfh		
Component		Loading (lb/hr)
Ethane Propane Isobutane	6.94e+001 1.23e+001 5.46e+000 7.83e-001 1.70e+000	1.29e+000 8.36e-001 1.58e-001
Cyclopentane	4.94e-001 1.77e-003 1.44e-001	1.24e-001 4.32e-004 4.32e-002
Methylcyclohexane 2,2,4-Trimethylpentane	4.03e-001 3.67e-003	1.40e-001 1.25e-003 7.09e-002
Ethylbenzene	4.03e+000 3.33e+000	3.68e-002 1.49e+000
Total Components	100.00	1.08e+001



# Certificate of Analysis

Number: 1030-14020166-003A

Feb. 18, 2014

W. Steven Kiser Dominion Transmission 335 US Highway 33 West Weston, 26452

Station Name: Craig Station Sample Point: Inlet Dehy Cylinder No: 712 Analyzed: 02/13/2014 06:08:09 by JD Sampled By:DFSample Of:GasSpotSample Date:01/17/2014 10:00Sample Conditions:253 psig, @ 110 °FMethod:GPA 2286

Analytical Data						
Components	Mol. %	Wt. %	GPM at 14.696 psia			
Nitrogen Carbon Dioxide	1.175 0.155	1.554 0.322		GPM TOTAL C2+ GPM TOTAL C3+	6.207 2.555	
Methane	76.490	57.921		GPM TOTAL iC5+	0.372	
Ethane	13.640	19.359	3.652		0.012	
Propane	5.505	11.458	1.518			
lso-butane	0.699	1.918	0.229			
n-Butane	1.382	3.791	0.436			
Iso-pentane	0.354	1.206	0.130			
n-Pentane	0.285	0.971	0.103			
Hexanes Plus	0.315	1.500	0.139			
	100.000	100.000	6.207			
Physical Properties	S		Total	C6+		
Relative Density Rea	al Gas		0.7338	3.4621		
Calculated Molecula			21.19	100.27		
Compressibility Fact			0.9964			
GPA 2172-09 Calcu						
Calculated Gross E	BTU per ft <sup>3</sup> @	2 14.696 ps				
Real Gas Dry BTU	DTU		1268	5391		
Water Sat. Gas Bas			1245	5297		
Comments: H2O M H2S (		; Wt% : 1.4	87			

& Yaky

Hydrocarbon Laboratory Manager

Quality Assurance:

The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.



# Certificate of Analysis

Number: 1030-14020166-003A

Feb. 18, 2014

W. Steven Kiser Dominion Transmission 335 US Highway 33 West Weston, 26452

Station Name: Craig Station Sample Point: Inlet Dehy Cylinder No: 712 Analyzed: 02/13/2014 06:08:09 by JD Sampled By:DFSample Of:GasSpotSample Date:01/17/2014 10:00Sample Conditions:253 psig, @ 110 °FMethod:GPA 2286

Components	Mol. %	Wt. %	GPM at				
•			14.696 psia				
Nitrogen	1.175	1.554		GPM TOTAL C	2+	6.207	
Carbon Dioxide	0.155	0.322		GPM TOTAL C	3+	2.555	
Hydrogen Sulfide	NIL	NIL		GPM TOTAL IC	25+	0.372	
Methane	76.490	57.921					
Ethane	13.640	19.359	3.652				
Propane	5.505	11.458	1.518				
Iso-Butane	0.699	1.918	0.229				
n-Butane	1.382	3.791	0.436				
Iso-Pentane	0.354	1.206	0.130				
n-Pentane	0.285	0.971	0.103				
Hexanes	0.120	0.479	0.049				
Heptanes Plus	0.195	1.021	0.090				
	100.000	100.000	6.207				
Physical Properties		То	tal	C7+			
Relative Density Real	Gas	0.73	38	3.7729			
Calculated Molecular \	Neight	21.	19	109.27			
Compressibility Factor		0.99	64				
GPA 2172-09 Calcula							
Calculated Gross BT	U per ft <sup>3</sup> @ 1	4.696 psia &	60°F				
Real Gas Dry BTU			68	5807			
Water Sat. Gas Base I	BTU	12	45	5706			

Olio Saluy

Hydrocarbon Laboratory Manager

Quality Assurance:

The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.



# Certificate of Analysis

Number: 1030-14020166-003A

Feb. 18, 2014

W. Steven Kiser Dominion Transmission 335 US Highway 33 West Weston, 26452

Station Name: Craig Station Sample Point: Inlet Dehy Cylinder No: 712 Analyzed: 02/13/2014 06:08:09 by JD Sampled By:DFSample Of:GasSpotSample Date:01/17/2014 10:00Sample Conditions:253 psig, @ 110 °FMethod:GPA 2286

Components	Mol. %	Wt. %	GPM at 14.696 psia		
Nitrogen	1.175	1.554		GPM TOTAL C2+	6.207
Methane	76.490	57.921			
Carbon Dioxide	0.155	0.322			
Hydrogen Sulfide	NIL	NIL			
Ethane	13.640	19.359	3.652		
Propane	5.505	11.458	1.518		
Iso-Butane	0.699	1.918	0.229		
n-Butane	1.382	3.791	0.436		
Iso-Pentane	0.354	1.206	0.130		
n-Pentane	0.285	0.971	0.103		
i-Hexanes	0.075	0.295	0.030		
n-Hexane	0.045	0.184	0.019		
Benzene	0.002	0.006	NIL		
Cyclohexane	0.010	0.040	0.003		
i-Heptanes	0.045	0.205	0.019		
n-Heptane	0.018	0.087	0.009		
Toluene	0.005	0.020	0.002		
i-Octanes	0.044	0.229	0.020		
n-Octane	0.009	0.049	0.005		
Ethylbenzene	NIL	NIL	NIL		
Xylenes	0.014	0.064	0.005		
i-Nonanes	0.016	0.105	0.009		
n-Nonane	0.007	0.041	0.004		
i-Decanes	0.016	0.101	0.008		
n-Decane	0.003	0.023	0.002		
Undecanes	0.004	0.035	0.003		
Dodecanes	0.002	0.016	0.001		
Tridecanes	NIL	NIL	NIL		
Tetradecanes Plus	NIL	NIL	NIL		



Number: 1030-14020166-003A

Feb. 18, 2014

W. Steven Kiser Dominion Transmission 335 US Highway 33 West Weston, 26452

Station Name: Craig Station Sample Point: Inlet Dehy Cylinder No: 712 Analyzed: 02/13/2014 06:08:09 by JD Sampled By:DFSample Of:GasSpotSample Date:01/17/2014 10:00Sample Conditions: 253 psig, @ 110 °FMethod:GPA 2286

Physical Properties	Total
Calculated Molecular Weight	21.186
GPA 2172-09 Calculation:	
Calculated Gross BTU per ft <sup>3</sup> @ 14.69	6 psia & 60°F
Real Gas Dry BTU	1267.5
Water Sat. Gas Base BTU	1245
Relative Density Real Gas	0.7338
Compressibility Factor	0.9964
Comments: H2S 0 ppm	

Clip Salug

Quality Assurance:

Hydrocarbon Laboratory Manager The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.



Number: 1030-14020166-004A

Feb. 18, 2014

W. Steven Kiser Dominion Transmission 335 US Highway 33 West Weston, 26452

Station Name: Craig Station Sample Point: Inlet Dehy Cylinder No: 145 Analyzed: 02/13/2014 07:13:50 by JD

Sampled By:	DF	
Sample Of:	Gas	Spot
Sample Date:	01/17/201	4 10:10
Sample Conditions:	253 psig,	@ 110 °F
Method:	GPA 2286	;

Analytical Data						
Components	Mol. %	Wt. %	GPM at 14.696 psia			
Nitrogen Carbon Dioxide Methane Ethane Propane Iso-butane n-Butane Iso-pentane n-Pentane Hexanes Plus	2.386 0.239 75.351 12.953 5.371 0.723 1.472 0.445 0.383 0.677 100.000	3.081 0.485 55.725 17.955 10.918 1.937 3.944 1.480 1.274 3.201 100.000	3.468 1.482 0.237 0.465 0.163 0.139 0.307 6.261	GPM TOTAL C2+ GPM TOTAL C3+ GPM TOTAL iC5+	6.261 2.793 0.609	
Physical Properties         Relative Density Real Gas         Calculated Molecular Weight         Compressibility Factor         GPA 2172-09 Calculation:         Calculated Gross BTU per ft <sup>3</sup> @ 14.696 per         Real Gas Dry BTU         Water Sat. Gas Base BTU         Comments:       H2O Mol% : 1.744 ; Wt% : 1.4		1272 1250	<b>C6+</b> 3.5359 102.41 5506 5410			

is Yalug

Hydrocarbon Laboratory Manager

Quality Assurance:

The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.



Number: 1030-14020166-004A

Feb. 18, 2014

W. Steven Kiser Dominion Transmission 335 US Highway 33 West Weston, 26452

Station Name: Craig Station Sample Point: Inlet Dehy Cylinder No: 145 Analyzed: 02/13/2014 07:13:50 by JD

Sampled By:	DF	
Sample Of:	Gas	Spot
Sample Date:	01/17/2014	4 10:10
Sample Conditions:	253 psig, (	@ 110 °F
Method:	GPA 2286	

Components	Mol. %	Wt. %	GPM at 14.696 psia				
Nitrogen	2.386	3.081		GPM TOTAL	C2+	6.261	
Carbon Dioxide	0.239	0.485		GPM TOTAL	C3+	2.793	
Hydrogen Sulfide	NIL	NIL		GPM TOTAL	iC5+	0.609	
Methane	75.351	55.725					
Ethane	12.953	17.955	3.468				
Propane	5.371	10.918	1.482				
Iso-Butane	0.723	1.937	0.237				
n-Butane	1.472	3.944	0.465				
Iso-Pentane	0.445	1.480	0.163				
n-Pentane	0.383	1.274	0.139				
Hexanes	0.211	0.831	0.086				
Heptanes Plus	0.466	2.370	0.221				
	100.000	100.000	6.261				
Physical Properties		То	tal	C7+			
Relative Density Real (	Gas	0.75	15	3.8022			
Calculated Molecular V	Veight	21.	69	110.12			
<b>Compressibility Factor</b>		0.99	62				
GPA 2172-09 Calculat	tion:						
<b>Calculated Gross BTI</b>	J per ft <sup>3</sup> @ 1	4.696 psia &	60°F				
Real Gas Dry BTU		12	72	5870			
Water Sat. Gas Base E	BTU	12	50	5768			

Chio Salay

Hydrocarbon Laboratory Manager

Quality Assurance:

The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.



Number: 1030-14020166-004A

Feb. 18, 2014

W. Steven Kiser Dominion Transmission 335 US Highway 33 West Weston, 26452

Station Name: Craig Station Sample Point: Inlet Dehy Cylinder No: 145 Analyzed: 02/13/2014 07:13:50 by JD Sampled By:DFSample Of:GasSpotSample Date:01/17/2014 10:10Sample Conditions: 253 psig, @ 110 °FMethod:GPA 2286

Components	Mol. %	Wt. %	GPM at 14.696 psia		
Nitrogen	2.386	3.081		GPM TOTAL C2+	6.261
Methane	75.351	55.725			
Carbon Dioxide	0.239	0.485			
Hydrogen Sulfide	NIL	NIL			
Ethane	12.953	17.955	3.468		
Propane	5.371	10.918	1.482		
Iso-Butane	0.723	1.937	0.237		
n-Butane	1.472	3.944	0.465		
Iso-Pentane	0.445	1.480	0.163		
n-Pentane	0.383	1.274	0.139		
i-Hexanes	0.127	0.496	0.051		
n-Hexane	0.084	0.335	0.035		
Benzene	0.003	0.011	0.001		
Cyclohexane	0.020	0.078	0.007		
i-Heptanes	0.096	0.423	0.042		
n-Heptane	0.044	0.204	0.021		
Toluene	0.010	0.043	0.003		
i-Octanes	0.107	0.533	0.049		
n-Octane	0.026	0.138	0.014		
Ethylbenzene	0.001	0.006	0.001		
Xylenes	0.031	0.155	0.012		
i-Nonanes	0.049	0.282	0.026		
n-Nonane	0.019	0.110	0.011		
i-Decanes	0.044	0.278	0.024		
n-Decane	0.007	0.047	0.004		
Undecanes	0.008	0.053	0.005		
Dodecanes	0.001	0.009	0.001		
Tridecanes	NIL	NIL	NIL		
Tetradecanes Plus	NIL	NIL	NIL		



Number: 1030-14020166-004A

Feb. 18, 2014

W. Steven Kiser Dominion Transmission 335 US Highway 33 West Weston, 26452

Station Name: Craig Station Sample Point: Inlet Dehy Cylinder No: 145 Analyzed: 02/13/2014 07:13:50 by JD Sampled By:DFSample Of:GasSpotSample Date:01/17/2014 10:10Sample Conditions:253 psig, @ 110 °FMethod:GPA 2286

Physical Properties	Total		
Calculated Molecular Weight	21.693		
GPA 2172-09 Calculation:			
Calculated Gross BTU per ft <sup>3</sup> @ 14.69	6 psia & 60°F		
Real Gas Dry BTU	1272.2		
Water Sat. Gas Base BTU	1250		
Relative Density Real Gas 0.7			
Compressibility Factor	0.9962		
Comments: H2S 0 ppm			

Clip Salay

Quality Assurance:

The above analyses are performed in accordance with ASTM, UOP, GPA guidelines for quality assurance, unless otherwise stated.

Hydrocarbon Laboratory Manager

## ATTACHMENT O

Monitoring/Recordkeeping/Reporting/Testing Plans

Plan Type	Emission unit	Pollutant	Requirements	Frequency	Method of Measurement	Regulatory Reference
Recordkeeping	Dehydration Unit	НАР	Maintain following records: Actual annual natural gas throughput OR actual average annual benzene emissions	Annual	Station natural gas throughput flowmeter	40 CFR 63.774(d)(1)

### ATTACHMENT O - MONITORING, RECORDING, REPORTING, AND TESTING PLANS

ATTACHMENT P

**Public Notice** 

### AIR QUALITY PERMIT NOTICE Notice of Application

Notice is given that Dominion Transmission, Inc. has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a modification permit (R-13) to modify the natural gas compressor station (the Craig Compressor Station) located near the Town of Smithville, in Ritchie County, West Virginia. The site latitude and longitude coordinates are: 39.07118 N, 81.09838 W.

The applicant estimates that the change in potential to emit for the facility of the following Regulated Air Pollutants will be:

Particulate Matter (PM) =  $\sim$ 0 tpy Sulfur Dioxide (SO<sub>2</sub>) =  $\sim$ 0 tpy Volatile Organic Compounds (VOC) = -8 tpy Carbon Monoxide (CO) =  $\sim$ 0 tpy Nitrogen Oxides (NOx) =  $\sim$ 0 tpy Hazardous Air Pollutants (HAPs) = -4 tpy

Startup of operation will begin during or about November of 2015. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57<sup>th</sup> Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1215, during normal business hours.

Dated this the (Day) day of (Month), (Year).

By: Dominion Transmission, Inc. Brian Sheppard Vice President, Pipeline Operations 445 West Main Street Clarksburg WV 26301

ATTACHMENT S

**Title V Permit Revision Information** 

#### Attachment S

#### **Title V Permit Revision Information**

1. New Applicable Requirements Summary					
Mark all applicable requirements associated with the changes involved with this permit revision:					
SIP	☐ FIP				
Minor source NSR (45CSR13)	D PSD (45CSR14)				
NESHAP (45CSR15)	Nonattainment NSR (45CSR19)				
Section 111 NSPS (Subpart(s))	Section 112(d) MACT standards (Subpart(s) Subpart HH )				
Section 112(g) Case-by-case MACT	112(r) RMP				
Section 112(i) Early reduction of HAP	Consumer/commercial prod. reqts., section 183(e)				
Section 129 Standards/Reqts.	Stratospheric ozone (Title VI)				
Tank vessel reqt., section 183(f)	Emissions cap 45CSR§30-2.6.1				
NAAQS, increments or visibility (temp. sources)	45CSR27 State enforceable only rule				
45CSR4 State enforceable only rule	Acid Rain (Title IV, 45CSR33)				
Emissions Trading and Banking (45CSR28)	Compliance Assurance Monitoring (40CFR64) <sup>(1)</sup>				
NO <sub>x</sub> Budget Trading Program Non-EGUs (45CSR1)	NO <sub>x</sub> Budget Trading Program EGUs (45CSR26)				
<sup>(1)</sup> If this box is checked, please include <b>Compliance Assu</b> Specific Emission Unit (PSEU) (See Attachment H to Title explain why <b>Compliance Assurance Monitoring</b> is not ap	V Application). If this box is not checked, please				
Unit is exempt from CAM because it is subject to emiss the Act (i.e., 40 CFR 63, Subpart HH)	sion standards proposed after 11/15/90 to Section 112 of				

#### 2. Non Applicability Determinations

List all requirements, which the source has determined not applicable to this permit revision and for which a permit shield is requested. The listing shall also include the rule citation and a rationale for the determination.

40 CFR 60, Subparts D, Da, Db, Dc, OOOO

40 CFR 63, Subparts HHH, DDDDD, JJJJJJ

45 CSR 21

45 CSR 27

See rationale for determination in Attachment D.

**Permit Shield Requested** (not applicable to Minor Modifications)

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.

#### 3. Suggested Title V Draft Permit Language

Are there any changes involved with this Title V Permit revision outside of the scope of the NSR Permit revision?  $\Box$  Yes  $\boxtimes$  No If Yes, describe the changes below.

Also, please provide **Suggested Title V Draft Permit language** for the proposed Title V Permit revision (including all applicable requirements associated with the permit revision and any associated monitoring /recordkeeping/ reporting requirements), OR attach a marked up pages of current Title V Permit. Please include appropriate citations (Permit or Consent Order number, condition number and/or rule citation (e.g. 45CSR§7-4.1)) for those requirements being added / revised.

#### 4. Active NSR Permits/Permit Determinations/Consent Orders Associated With This Permit Revision

Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number
R30-08500004-2011	12/20/2011	
	/ /	
	/ /	

5. Inactive NSR Permits/Obsolete Permit or Consent Orders Conditions Associated With This Revision				
Permit or Consent Order Number	Date of Issuance	Permit/Consent Order Condition Number		
	MM/DD/YYYY			
	/ /			
	/ /			

6. Change in Potential Emissions				
Pollutant	Change in Potential Emissions (+ or -), TPY			
Nitrogen Oxides	~ 0			
Carbon Dioxide	~ 0			
Particulate Matter	~ 0			
Sulfur Dioxide	~ 0			
Volatile Organic Compounds	-8 tpy			
Hazardous Air Pollutants	-4 tpy			
All of the required forms and additional information c	an be found under the Permitting Section of DAQ's website, or requested by pho			

Note:	This certification must be signed by a responsible official. Applications without a sign
	certification will be returned as incomplete. The criteria for allowing the use of Min
	Modification Procedures are as follows:
i.	Proposed changes do not violate any applicable requirement;
ii.	Proposed changes do not involve significant changes to existing monitoring, reporting, recordkeeping requirements in the permit;
iii.	Proposed changes do not require or change a case-by-case determination of an emissi limitation or other standard, or a source-specific determination for temporary sources ambient air quality impacts, or a visibility increment analysis;
iv.	Proposed changes do not seek to establish or change a permit term or condition for which the is no underlying applicable requirement and which permit or condition has been used to av- an applicable requirement to which the source would otherwise be subject (synthetic mind Such terms and conditions include, but are not limited to a federally enforceable emissions of used to avoid classification as a modification under any provision of Title I or any alternat emissions limit approved pursuant to regulations promulgated under § 112(j)(5) of the Cle Air Act;
v.	Proposed changes do not involve preconstruction review under Title I of the Clean Air Act 45CSR14 and 45CSR19;
vi.	Proposed changes are not required under any rule of the Director to be processed as significant modification;
procedure permits, o	tanding subparagraph 45CSR§30-6.5.a.1.A. (items i through vi above), minor permit modifications may be used for permit modifications involving the use of economic incentives, marketa emissions trading, and other similar approaches, to the extent that such minor permit modifications are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part
procedure permits, of procedure the State operating <b>Pursuant</b> of Minor	es may be used for permit modifications involving the use of economic incentives, marketa emissions trading, and other similar approaches, to the extent that such minor permit modification es are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title permit issued under 45CSR30. to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for the permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Min modification procedures are hereby requested for processing of this application. Date: (Please use blue ink)
procedure permits, of procedure the State operating <b>Pursuant</b> of Minor permit m igned):	es may be used for permit modifications involving the use of economic incentives, marketa emissions trading, and other similar approaches, to the extent that such minor permit modification es are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title permit issued under 45CSR30. to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for the permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Min modification procedures are hereby requested for processing of this application. Date: (Please use blue ink)
procedure permits, of procedure the State operating <b>Pursuant</b> of Minor permit m igned):	es may be used for permit modifications involving the use of economic incentives, marketa emissions trading, and other similar approaches, to the extent that such minor permit modificati es are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title permit issued under 45CSR30. to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for the permit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Min modification procedures are hereby requested for processing of this application. d): Brian Sheppard Date: Date: Date: Wice President, Pipeline
procedure permits, o procedure the State operating <b>Pursuant</b> of Minor permit m igned): amed (type	es may be used for permit modifications involving the use of economic incentives, marketa emissions trading, and other similar approaches, to the extent that such minor permit modificati es are explicitly provided for in rules of the Director which are approved by the U.S. EPA as a part Implementation Plan under the Clean Air Act, or which may be otherwise provided for in the Title permit issued under 45CSR30. to 45CSR§30-6.5.a.2.C., the proposed modification contained herein meets the criteria for upermit modification procedures as set forth in Section 45CSR§30-6.5.a.1.A. The use of Min modification procedures are hereby requested for processing of this application. Date: (Please use blue ink) d): Brian Sheppard Date: Uice President, Pipeline Operations

All of the required forms and additional information can be found under the Permitting Section of DAQ's website, or requested by phone.