

Cranberry Pipeline Corporation

G35-A Class II Administrative Update Permit Application

Poca T Natural Gas Compressor Station

Newhall, West Virginia



Prepared By:

ENVIRONMENTAL RESOURCES MANAGEMENT, Inc. Hurricane, West Virginia September 2015



September 24, 2015

Mr. William F. Durham, Director West Virginia Department of Environmental Protection Division of Air Quality 601 57th Street, SE Charleston, West Virginia, 25304

RE: G35-A Class II Administrative Update Poca T Natural Gas Compressor Station Cranberry Pipeline Corporation

Dear Director Durham:

Cranberry Pipeline Corporation (Cranberry) is pleased to submit the enclosed application for a General Permit G35-A Class II Administrative Update for the Poca T Natural Gas Compressor Station near Newhall in McDowell County, West Virginia. The original hard copy and two (2) CD-ROMs of the complete application package are enclosed.

Cranberry requests that the WVDAQ issue this administrative update to the existing G35-A, if possible. Based upon our current understanding of the timetable for the issuance of the updated G35-C general permit program, Cranberry would prefer to be issued a permit under the existing G35-A program to prevent any potential delay.

A check for the application fee in the amount of \$300.00 made payable to the WVDEP – Division of Air Quality is also included with this package.

A public notice for the proposed project will be published as soon as possible. Cranberry will forward the original Affidavit of Publication to your attention once it is received from the publisher.

If you have any questions about the information submitted or if you would like to discuss this project, please do not hesitate to contact me at (304) 347-1642.

Sincerely,

Randy Spencer Safety and Environmental Health Manger

cc: Grant Morgan, ERM – Grant.morgan@erm.com

INTRODUCTION

Cranberry Pipeline Corporation (Cranberry) submits this G35-A Class II Administrative Update Permit Application to the WVDEP's Department of Air Quality for the Poca T natural gas compressor station located in McDowell County, West Virginia. This application addresses the operational activities associated with the compression of natural gas at the Poca T facility.

FACILITY DESCRIPTION

The Poca T natural gas production site operates in McDowell County, WV and consists of one (1) natural gas compressor engine, one (1) dehydration unit and associated 0.25 mmBtu/hr reboiler, and one (1) pipeline fluids tank. The natural gas will be transported on-site via pipeline, compressed, and dehydrated for delivery to the gas sales line.

Cranberry seeks authority to correct the burner rating of the glycol dehydrator reboiler (RBV-1) and remove the TEG Storage Tank (T02) currently permitted in G35-A090. The other permitted emission units, ENG-1, RSV-1, and T01, are not being amended in this update.

A process flow diagram is included in this application in Attachment D.

REGULATORY DISCUSSION

This section outlines the State and Federal air quality regulations that could reasonably expected to apply to the Poca T Compressor Station and makes an applicability determination for each regulation based on activities conducted at the site and the emissions of regulated air pollutants. This review is presented to supplement and/or add clarification to the information provided in the WVDEP G35-A permit application forms.

The West Virginia State Regulations address applicable state (i.e. State Implementation Plan) rules as well as federal regulations, including Prevention of Significant Deterioration or Nonattainment New Source Review Preconstruction Permitting, Title V, New Source Performance Standards, and National Emission Standards for Hazardous Air Pollutants. The regulatory requirements in reference to Poca T Compressor Station are described in detail in the below section.

WEST VIRGINIA STATE AIR REGULATIONS

45 CSR 02 – To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers

The reboiler is an indirect heat exchanger that combust natural gas. Such units are subject to 10% opacity as a six-minute block average limitation, but are exempt from most other requirements in the rule aside from discretionary testing requirements.

45 CSR 04 – To Prevent and Control the Discharge of Air Pollutants into the Air Which Causes or Contributes to an Objectionable Odor

Operations conducted at the Poca T Compressor station are subject to this requirement. Based on the nature of the process at this station, the presence of objectionable odors is unlikely.

45 CSR 06 – Control of Air Pollution from the Combustion of Refuse

The Poca T Compressor Station does not combust refuse.

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

Natural gas combustion devices will be operated in accordance with the sulfur dioxide concentration limitation. Pipeline quality natural gas will be used at the Poca T facility.

45 CSR 13 – Permits for Construction, Modification, Relocation, and Operation of Stationary Sources of Air Pollutants

This G35-A permit application is being submitted for the operational activities associated with Cranberry's production of natural gas.

45 CSR 14 / 45 CSR 19 – Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration / Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contributed to Non-attainment

Federal construction permitting programs regulate new and modified sources of attainment pollutants. The G35-A applicability criteria exclude facilities that meet the definition of a major source, as defined in 45 CSR 19, from being eligible for the general permit.

Operation of equipment at the Poca T Compressor Station will not exceed major source emission thresholds established by these permitting programs. Cranberry will monitor future construction and modification activities at the site closely and will compare future increase in emissions with major source thresholds to ensure these activities will not trigger either program.

45 CSR 16 - Standards of Performance for New Stationary Sources (NSPS)

45 CSR 16 applies to registrants that are subject to NSPS requirements described in more detail in the Federal Regulations section. There are no applicable requirements of NSPS in this G35-A general permit.

45 CSR 30 – Requirements for Operating Permits

45 CSR 30 applies to the requirements of the federal Title V operating permit program (40 CFR 70). 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 HAP, 25 tpy of any combination of HAP, and 100 tpy of other regulated pollutants.

The potential emissions of regulated pollutants are below the corresponding threshold(s) at this facility. The facility is not major source with respect to the Title V operating permit program.

45 CSR 34 – National Emission Standards for Hazardous Air Pollutants (NESHAP)

45 CSR 34 applies to registrants that are subject to NESHAP requirements described in more detail in the Federal Regulations section. No applicable requirements of NESHAPs required in this G35-A general permit.

FEDERAL REGULATIONS

The following NSPS included in the G35-A permit are not applicable to the Poca T facility:

40 CFR 60, Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines)

Subpart JJJJ established standards and compliance schedules for the control of volatile organic compounds (VOC), Nitrogen Oxides (NOx), and Carbon Monoxide (CO) emissions from affected facilities that commence construction, modification, or reconstruction after June 12, 2006.

The natural gas compressor engine that will be installed at the Poca T Compressor Station is not subject to the requirements of this Rule. The compressor engine is a spark ignition internal combustion engine that was manufactured prior to 2005. Therefore, these requirements do not apply.

No additional NSPS are currently applicable to this facility.

NESHAP ZZZZ is applicable to the existing compressor engine, which is not included in this administrative update.

ALL VIEST	WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTEC DIVISION OF AIR QUALITY 601 57 th Street, SE Charleston, WV 25304 Phone: (304) 926-0475 • www.dep.wv.gov/		APPLICATION FOR GENERAL PERMIT REGISTRATION CONSTRUCT, MODIFY, RELOCATE OR ADMINISTRATIVELY UPDATE A STATIONARY SOURCE OF AIR POLLUTAN			
		OCATI		LASS I ADMINISTRATIVE UPDATE		
				LASS II ADMINISTRATIVE UPDATE		
	CHECK WHICH TYPE OF GENERAL PER		GISTRATION	OU ARE APPLYING FOR:		
G20-B - Hot I G30-D - Natu G33-A - Spar	Preparation and Handling Mix Asphalt ral Gas Compressor Stations k Ignition Internal Combustion Engines ral Gas Compressor Stations (Flare/Glycol Dehydra	G40-C - Nonmetallic Minerals Processing G50-B - Concrete Batch G60-C - Class II Emergency Generator G65-C - Class I Emergency Generator G70-A - Class II Oil and Natural Gas Production Facility				
	SECTION I. GENERAL INFORMATION					
1. Name of applicant (as registered with the WV Secretary of State's Office): 2. Federal Employer ID No. (FEIN):						
	Cranberry Pipeline Corporation			042989934		
3. Applicant's mai	ling address:	4.	Applicant's physic	cal address:		
900 Lee Street Ea Charleston, WV 2		Newhall, McDowell County, WV				
5. If applicant is a	subsidiary corporation, please provide the name of	parent c	orporation:			
- IF YE	 6. WV BUSINESS REGISTRATION. Is the applicant a resident of the State of West Virginia? XES □ NO - IF YES, provide a copy of the Certificate of Incorporation/ Organization / Limited Partnership (one page) including any name change amendments or other Business Registration Certificate as Attachment A. - IF NO, provide a copy of the Certificate of Authority / Authority of LLC / Registration (one page) including any name change amendments or other Business Certificate as Attachment A. 					
·	SECTION II. FA		INFORMATION	N		
modified, relocated	modified, relocated or administratively updated (e.g., coal Cla		indard Industrial cation cation (SIC) code:	AND 8b. North American Industry 1311 System (NAICS) code: 211111		
Class II Oil and N	atural Gas Production Facility					
9. DAQ Plant ID N	lo. (for existing facilities only):			R13 and other General Permit numbers associated ting facilities only):		

G35-A090

Date of Last Application Revision 10/18/2013

047-00071

A: PRIMARY OPERATING SITE INFORMATION						
11A. Facility name of primary operating site:	12A. Address of primary operating site:	12A. Address of primary operating site:				
Роса Т	Mailing: 900 Lee Street East, Suite 1500 Charleston, WV 25301 Physical: Newhall, McDowell County, WV					
13A. Does the applicant own, lease, have an option to buy, or otherwise have control of the proposed site? ☑ YES □ NO - IF YES, please explain: The applicant leases the proposed site. □ NO						
- IF NO , YOU ARE NOT ELIGIE	BLE FOR A PERMIT FOR THIS SOURCE.					
nearest state road;	- For Construction or Relocation permits, please provide directions to the proposed new site location from the nearest state road. Include a					
15A. Nearest city or town:	16A. County:	17A. UTM Coordinates:				
Newhall McDowell Northing (KM): 4,125.731 Easting (KM): 446.595 Zone: 17						
18A. Briefly describe the proposed new operation Cranberry Pipeline proposes to update the natu 0.25 mmBtu/hr. This equipment was incorrectly seeks to remove the TEG storage tank from the an after-the-fact update to the permit.	Iral gas reboiler from 0.18 mmBtu/hr to permitted in G35-A090. Cranberry also	 19A. Latitude & Longitude Coordinates (NAD83, Decimal Degrees to 5 digits): Latitude: 37.27665 Longitude: -81.60223 				

SECTION III. ATTACHMENTS AND SUPPORTING DOCUMENTS

23. Include a check payable to WVDEP – Division of Air Quality with the appropriate application fee (per 45CSR22 and 45CSR13).

24. Include a Table of Contents as the first page of your application package.

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

25. Please check all attachments included with this permit application. Please refer to the appropriate reference document for an explanation of the attachments listed below.

ATTACHMENT A : CURRENT BUSINESS CERTIFICATE

ATTACHMENT B: PROCESS DESCRIPTION

- ATTACHMENT C: DESCRIPTION OF FUGITIVE EMISSIONS
- ATTACHMENT D: PROCESS FLOW DIAGRAM

ATTACHMENT E: PLOT PLAN

- ATTACHMENT F: AREA MAP
- ☑ ATTACHMENT G: EQUIPMENT DATA SHEETS AND REGISTRATION SECTION APPLICABILITY FORM
- ATTACHMENT H: AIR POLLUTION CONTROL DEVICE SHEETS (NOT APPLICABLE)
- ATTACHMENT I: EMISSIONS CALCULATIONS

ATTACHMENT J: CLASS I LEGAL ADVERTISEMENT

ATTACHMENT K: ELECTRONIC SUBMITTAL (NOT APPLICABLE)

☑ ATTACHMENT L: GENERAL PERMIT REGISTRATION APPLICATION FEE

ATTACHMENT M: SITING CRITERIA WAIVER (NOT APPLICABLE)

ATTACHMENT N: MATERIAL SAFETY DATA SHEETS (MSDS) (NOT APPLICABLE)

☑ ATTACHMENT O: EMISSIONS SUMMARY SHEETS

OTHER SUPPORTING DOCUMENTATION NOT DESCRIBED ABOVE (Equipment Drawings, Aggregation Discussion, etc.)

(NOT APPLICABLE)

Please mail an original and two copies of the complete General Permit Registration Application with the signature(s) to the DAQ Permitting Section, at the address shown on the front page of this application. Please DO NOT fax permit applications. For questions regarding applications or West Virginia Air Pollution Rules and Regulations, please refer to the website shown on the front page of the application or call the phone number also provided on the front page of the application.

SECTION IV.	CERTIFICATION OF INFORMATION
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This General Permit Registration Application shall be signed below by a Responsible Official. A Responsible Official is a President, Vice President, Secretary, Treasurer, General Partner, General Manager, a member of a Board of Directors, or Owner, depending on business structure. A business may certify an Authorized Representative who shall have authority to bind the Corporation, Partnership, Limited Liability Company, Association, Joint Venture or Sole Proprietorship. Required records of daily throughput, hours of operation and maintenance, general correspondence, Emission Inventory, Certified Emission Statement, compliance certifications and all required notifications must be signed by a Responsible Official or an Authorized Representative. If a business wishes to certify an Authorized Representative, the official agreement below shall be checked off and the appropriate names and signatures entered. Any administratively incomplete or improperly signed or unsigned Registration Application will be returned to the applicant.
FOR A CORPORATION (domestic or foreign) I certify that I am a President, Vice President, Secretary, Treasurer or in charge of a principal business function of the corporation
FOR A PARTNERSHIP I certify that I am a General Partner
FOR A LIMITED LIABILITY COMPANY I certify that I am a General Partner or General Manager
FOR AN ASSOCIATION I certify that I am the President or a member of the Board of Directors
FOR A JOINT VENTURE I certify that I am the President, General Partner or General Manager
EOR A SOLE PROPRIETORSHIP I certify that I am the Owner and Proprietor I hereby certify that (please print or type) is an Authorized Representative and in that capacity shall represent the Interest of the business (e.g., Corporation, Partnership, Limited Liability Company, Association Joint Venture or Sole Proprietorship) and may obligate and legally bind the business. If the business changes its Authorized Representative, a Responsible Official shall notify the Director of the Office of Air Quality immediately, and/or,
I hereby certify that all information contained in this General Permit Registration Application and any supporting documents appended hereto is, to the best of my knowledge, true, accurate and complete, and that all reasonable efforts have been made to provide the most comprehensive information possible
Signature 9/29/15 (please use blue ink) Responsible Official Date
Name & Title Randy Spencer, Safety and Environmental Manager – North Region
Signature
Applicant's Name Cranberry Pipeline Corporation
Phone & Fax (304) 347-1642 Fax
Email: <u>randy.spencer@cabotog.com</u>

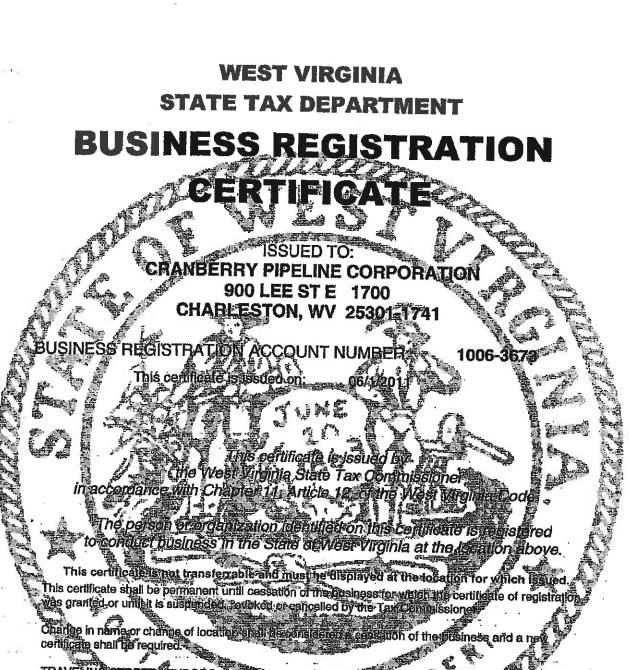
Table of Contents

- ATTACHMENT A BUSINESS CERTIFICATE
- ATTACHMENT B PROCESS DESCRIPTION
- ATTACHMENT C DESCRIPTION OF FUGITIVE EMISSIONS
- ATTACHMENT D PROCESS FLOW DIAGRAM
- ATTACHMENT E PLOT PLAN
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- ATTACHMENT G EQUIPMENT DATA SHEETS AND REGISTRATION SECTION APPLICABILITY FORM
- ATTACHMENT H AIR POLLUTION CONTROL DEVICE SHEETS (NOT APPLICABLE)
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- ATTACHMENT O EMISSION SUMMARY SHEETS

OTHER SUPPORTING DOCUMENTATION NOT DESCRIBED ABOVE (NOT APPLICABLE)

ATTACHMENT A

BUSINESS CERTIFICATE



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ATTACHMENT B

PROCESS DESCRIPTION

Attachment B Process Description

This G35-A Class II Administrative Update permit application is being filed for Cranberry Pipeline Corporation (Cranberry), and addresses operational activities associated with the Poca T Natural Gas Compressor Station. Incoming raw gas from surrounding production well pads enters the site via underground pipeline. The compressor station operates a separator on the suction side of the compressor engine, which removes excess fluids entrained within the gas stream. In the rare event fluids are realized at the separator, these liquids are transferred to the pipeline liquid tank (T01). T01 qualifies as a tank that does not have permitted emissions under the G35-A and the operation of this tank is not being amended in anyway with the submission of this administrative update.

The compressor engine located at the Poca T compressor station is a 346 hp Ajax DPC-360 natural gas compressor engine (ENG-1). The pressurized gas stream flows through a triethylene glycol dehydration unit (RSV-1), where any fluids still entrained within the gas is removed prior to the gas entering the downstream sales pipeline.

A process flow diagram is included as Attachment D.

ATTACHMENT C

DESCRIPTION OF FUGITIVE EMISSIONS

Attachment C

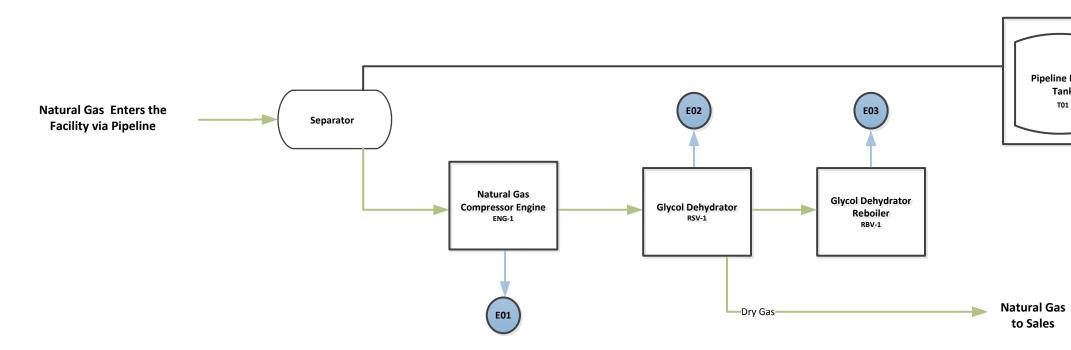
G35-A General Permit Description of Fugitive Emissions

This permit application is being filed for Cranberry Pipeline Corporation and addresses operational activities associated with the Poca T natural gas production site. Fugitive emissions are not being modified with the Class II Administrative Update.

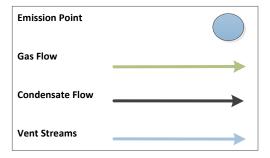
ATTACHMENT D

PROCESS FLOW DIAGRAM

Attachment D Poca T Natural Gas Facility **Process Flow Diagram**

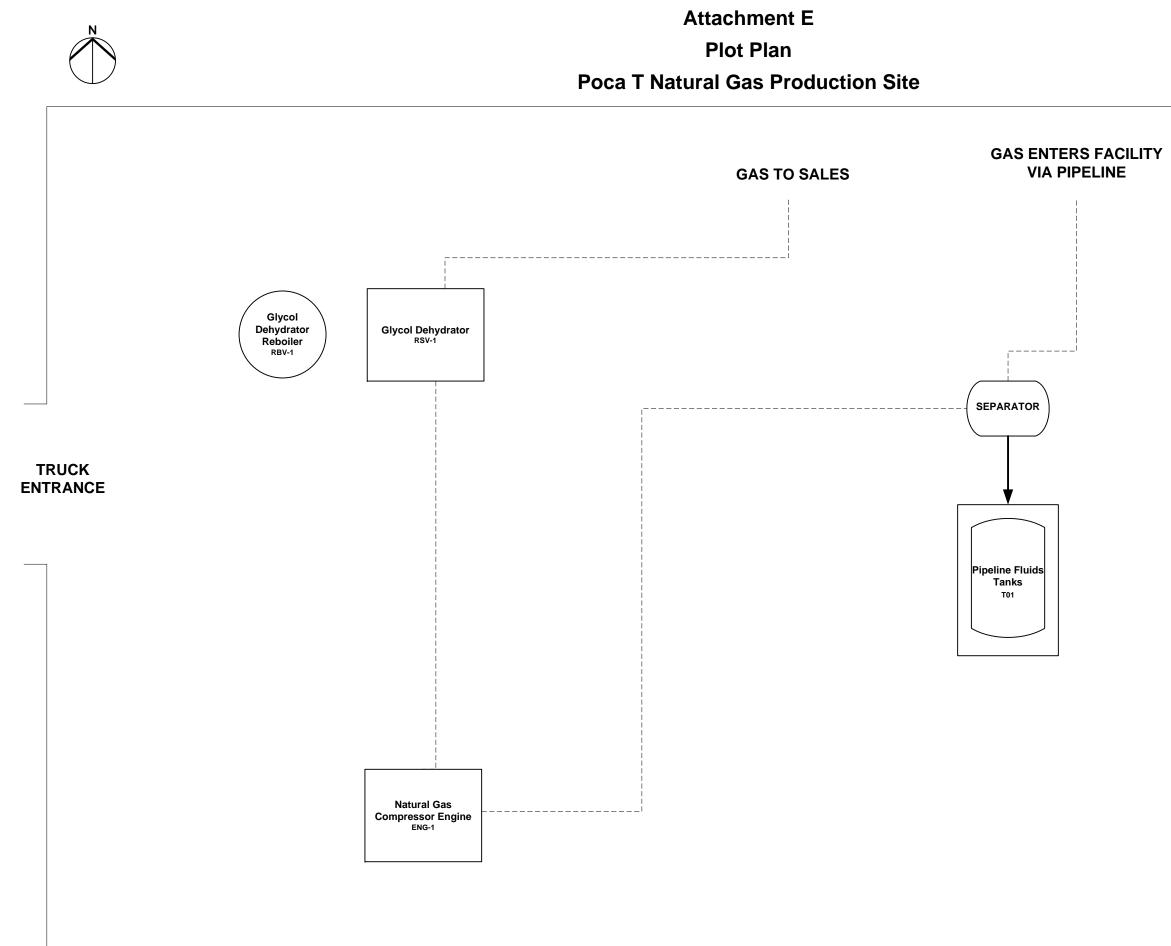


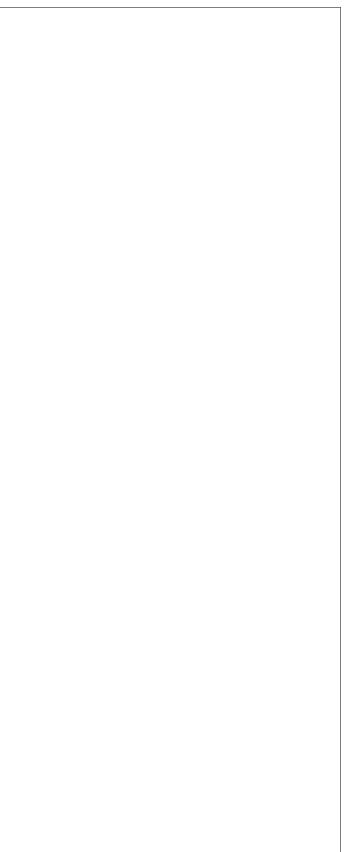
	_
inalina Eluida	
ipeline Fluids	
Tank	
T01	



ATTACHMENT E

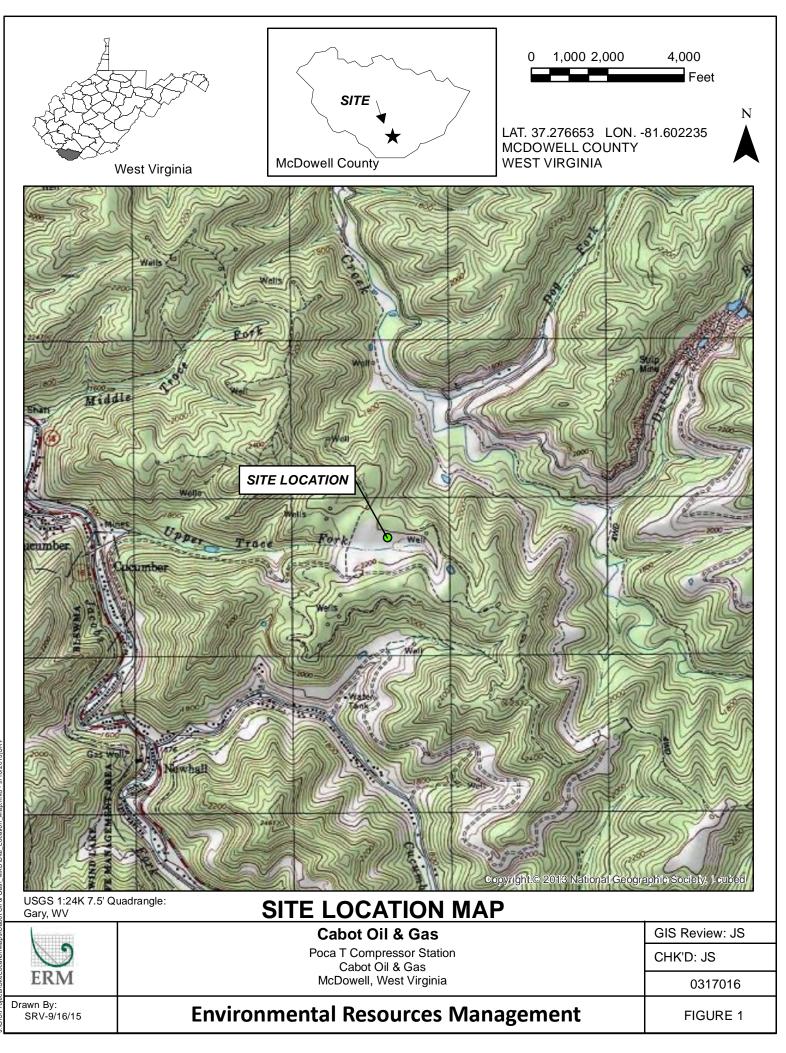
PLOT PLAN





ATTACHMENT F

AREA MAP



ATTACHMENT G

EQUIPMENT DATA SHEETS AND REGISTRATION SECTION APPLICABILITY FORM

General Permit G35-A Registration Section Applicability Form

General Permit G35-A was developed to allow qualified registrants to seek registration for a variety of sources. These sources include internal combustion engines, boilers, reboilers, line heaters, tanks, emergency generators, dehydration units not subject to MACT standards, dehydration units not subject to MACT standards and being controlled by a flare control device, dehydration units not subject to MACT standards and being controlled by recycling the dehydration unit back to flame zone of reboiler, dehydration units not subject to MACT standards being controlled by a thermal oxidizer, and permit exemptions including the less than 1 ton/year benzene exemption, the 40CFR63 Subpart HHH - Annual Average Flow of Gas Exemption (3 mmscf/day), and the 40CFR63 Subpart HHH - Annual Average Flow of Gas Exemption (10 mmscf/day). All registered facilities will be subject to Sections 1.0, 1.1, 2.0, 3.0, and 4.0.

General Permit G35-A allows the registrant to choose which sections of the permit that they wish to seek registration under. Therefore, please mark which sections that you are applying for registration under. Please keep in mind, that if this registration is approved, the issued registration will state which sections will apply to your affected facility.

Section 5	Reciprocating Internal Combustion Engines (R.I.C.E.)*	\boxtimes
Section 6	Boilers, Reboilers, and Line Heaters	\boxtimes
Section 7	Tanks	\boxtimes
Section 8	Emergency Generators	
Section 9	Dehydration Units Not Subject to MACT Standards	\boxtimes
Section 10	Dehydration Units Not Subject to MACT Standards and being controlled by a flare control device	
Section 11	Dehydration Units Not Subject to MACT Standards being controlled by recycling the dehydration unit back to the flame zone of the reboiler	
Section 12	Dehydration Units Not Subject to MACT Standards and being controlled by a thermal oxidizer	
Section 13	Permit Exemption (Less than 1 ton/year of benzene exemption)	\boxtimes
Section 14	Permit Exemption (40CFR63 Subpart HH – Annual average flow of gas exemption (3 mmscf/day))	
Section 15	Permit Exemption (40CFR63 Subpart HHH – Annual average flow of gas exemption (10 mmscf/day))	
Section 16	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (40CFR60 Subpart JJJJ)	

* Affected facilities that are subject to Section 5 may also be subject to Section 16. Therefore, if the applicant is seeking registration under both sections, please select both.

NATURAL GAS FIRED BOILER/LINE HEATER DATA SHEET

Source ID # ¹	Status ²	Design Heat Input (mmBtu/hr) ³	Hours of Operation (hrs/yr) ⁴	Fuel Heating Value (Btu/scf) ⁵
RVB-1	EXIST	0.25	8,760	1,020

1. Enter the appropriate Source Identification Numbers (Source ID #) for each boiler or line heater located at the compressor station. Boilers should be designated BLR-1, BLR-2, BLR-3, etc. Heaters or Line Heaters should be designated HTR-1, HTR-2, HTR-3, etc. Enter glycol dehydration unit Reboiler Vent data on the *Glycol Dehydration Unit Data Sheet*.

2. Enter the Status for each boiler or line heater using the following:

EXIST Existing Equipment

REM Equipment Removed

3. Enter boiler or line heater design heat input in mmBtu/hr.

4. Enter the annual hours of operation in hours/year for each boiler or line heater.

5. Enter the fuel heating value in Btu/standard cubic foot.

STORAGE TANK DATA SHEET

Source ID # ¹	Status ²	Content ³	Volume ⁴	Dia ⁵	Throughput ⁶	Orientation ⁷	Liquid Height ⁸
Т02	REM	TEG Storage Tank	500 gal	3	1,500	VERT	2

1. Enter the appropriate Source Identification Numbers (Source ID #) for each storage tank located at the compressor station. Tanks should be designated T01, T02, T03, etc.

2. Enter storage tank Status using the following:

EXIST Existing Equipment REM Equipment Removed NEW Installation of New Equipment

NEW Installation of New Equipment

3. Enter storage tank content such as condensate, pipeline liquids, glycol (DEG or TEG), lube oil, etc.

4. Enter storage tank volume in gallons.

5. Enter storage tank diameter in feet.

6. Enter storage tank throughput in gallons per year.

7. Enter storage tank orientation using the following:

VERT Vertical Tank

8. Enter storage tank average liquid height in feet.

2 of 7

HORZ Horizontal Tank

NATURAL GAS GLYCOL DEHYDRATION UNIT DATA SHEET

		Manufact	urer and Model	Sivalls		
		Max Dry Gas F	low Rate (mmscf/day)	3.0 mmscf/day		
		Design Heat	Input (mmBtu/hr)	0.25		
		Design Typ	be (DEG or TEG)	TEG		
	l Glycol	Sou	rce Status ²	ES		
Dehydra Da	ata	Date Installed/	Modified/Removed ³	Pre – 2005		
		Regenerator	Still Vent APCD ⁴	No	ne	
		Fuel H	IV (Btu/scf)	1,02	20	
		H ₂ S Cont	tent (gr/100 scf)	0.25		
		Opera	tion (hrs/yr)	8,760		
Source ID # ¹	Vent	Reference ⁵	Potential Emissions ⁶	lbs/hr	tons/yr	
	Reboiler Vent	AP-42	NO _X	0.02	0.11	
		AP-42	СО	0.02	0.09	
RBV-1		AP-42	VOC	<0.01	0.01	
		AP-42	SO_2	<0.01	<0.01	
		AP-42	PM ₁₀	<0.01	0.01	
		G35-A090	VOC	1.98	8.66	
		G35-A090	Benzene	0.15	0.64	
RSV-1	Glycol Regenerator	G35-A090	Ethylbenzene	0.33	1.44	
IXD Y -1	Still Vent	G35-A090	Toluene	0.23	1.01	
		G35-A090	Xylenes	0.36	1.57	
		G35-A090	n-Hexane	0.04	0.15	

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:

5.	NA FL TO Enter the Pot	None Flare Thermal Oxidizer tential Emissions Data Ref	CD CC erence designation using th		ser/Combustion Con	bination
	MD GR	Manufacturer's Data GRI-GLYCalc TM	AP OT	AP-42 Other	G35-A090	(please lis

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-GLYCalcTM (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-GLYCalcTM 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-GLYCalcTM is available on our website.

G35-A090 (please list)

West Virginia Department of Environmental Protection

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

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

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): 669,000		
Affected facility actual annual average hydrocarbon liquid throughput: (bbl/day): None		
The affected facility processes, upgrades, or stores hydrocarbon liquids prior to custody transfer.	Yes	X No
The affected facility processes, upgrades, or stores natural gas prior to the point at which natural gas	Yes	X No
(NG) enters the NG transmission and storage source category or is delivered to the end user.		
The affected facility is:		
prior to the point of custody transfer and there is no NG processing plant		
The affected facility transports or stores natural gas prior to entering the pipeline to a local	Yes	X 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	X No
Initial producing gas-to-oil ratio (GOR):scf/bbl API gravity:degrees		
Section B: Dehydration Unit (if applicable) ¹		
Description: Sivalls TEG Dehydration Unit		
Date of Installation:Pre - 2005Annual Operating Hours:8760Burner rating	g (MMbtu/hr):	0.25
Exhaust Stack Height (ft):20Stack Diameter (ft):0.85Stack	k Temp. (°F):	212
$Glycol Type: \square TEG \square EG \square Other:$		
Glycol Pump Type: Electric Gas If gas, what is the volume ratio?		FM/gpm
Condenser installed?	er Pressure	psig
Incinerator/flare installed? Yes No Destruction Eff%		
Other controls installed? Yes No Describe:		
Wet Gas ² : Gas Temp.: 76_ °F Gas Pressure 166_ psig		
(Upstream of Contact Tower) Saturated Gas? 🛛 Yes 🗌 No If no, water co	ontent lb/	MMSCF
Dry Gas: Gas Flowrate(MMSCFD) Actual <u>0.67</u> Design <u>3.0</u>		
(Downstream of Contact Tower) Water Content7.0_ lb/MMSCF		
Lean Glycol: Circulation rate (gpm) Actual ³ 3.0 Maximum ⁴ 3.5		
Pump make/model: Kimray 21015PV		
Glycol Flash Tank (if applicable): Temp.: <u>NA</u> ^o F Pressure <u>NA</u> psig Vented?	Yes	No 🗌
If no, describe vapor control:		
Stripping Gas (if applicable): Source of gas: NA Rate so	efm	

 Please attach the following required dehydration unit information: System map indicating the chain of custody information. See Page 43 of this document for an example of a gas flow schematic. It is not intended that the 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 b accomplished by submitting a process flow diagram indicating custody transfer points and the natural gas flow. However, the DAQ reserves the right to requess more detailed information in order to make the necessary decisions. Extended gas analysis from the Wet Gas Stream including mole percents of C₁-C₈, benzene, ethylbenzene, toluene, xylene and n-Hexane, using Gas Processor 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 o EPA Method TO-14, (or similar) should be used. GRI-GLYCalc Ver. 3.0 aggregate report based on maximum Lean Glycol circulation rate and maximum throughput. Detailed calculations of gas or hydrocarbon flow rate. 												
	Section C: Facility NESHAPS Subpart HH/HHH status											
	Subject to	ıbpart HH										
Affected facility	Subject to	ibpart HHH										
status:	Not Subject	□ < 10/25 TPY										
(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										

	Com	pressor Sta	Registration Number (Agency Use) G35-A								
		Potenti	al Emissions	(lbs/hr)	Potential Emissions (tons/yr)						
Source ID No.	NO _X	СО	VOC	SO_2	PM ₁₀	NO _X	СО	VOC	SO_2	PM ₁₀	

COMPR	COMPRESSOR STATION EMISSION SUMMARY SHEET FOR HAZARDOUS/TOXIC POLLUTANTS													
		Comp	ressor Stat	ion	Registration Number (Agency Use) G35-A									
		Po	otential Em	issions (lbs/	/hr)	Potential Emissions (tons/yr)								
Source ID No.	Benzene	Ethyl- benzene	Toluene	Xylenes	n- Hexane	Formalde- hyde	Benzene	Ethyl- benzene	Toluene	Xylenes	n- Hexane	Formalde- hyde		
	SEE ATTACHMENT I – Supporting Calculations													

ATTACHMENT H

AIR POLLUTION CONTROL DEVICE SHEET NOT APPLICABLE

ATTACHMENT I

SUPPORTING EMISSIONS CALCULATIONS

Reboiler 0.25 mmBtu/hr (RVB-1)

Pollutant	Emission Factor	Emission Factor Units	Emission Factor Basis / Source	Boiler Rating (MMBtu/hr)	Heat Value of Natural Gas (Btu/scf)	Annual Operating Hours	Max. Hourly Emissions. (Ib/hr)	Max. Annual Emissions. (tpy)
VOC's	5.5	lb/10 ⁶ scf	AP-42 Chapter 1.4	0.25	1,020	8,760	0.001	0.01
Hexane	1.8	lb/10 ⁶ scf	AP-42 Chapter 1.4	0.25	1,020	8,760	<0.001	0.002
Formaldehyde	0.075	lb/10 ⁶ scf	AP-42 Chapter 1.4	0.25	1,020	8,760	<0.001	<0.001
Benzene	0.0021	lb/10 ⁶ scf	AP-42 Chapter 1.4	0.25	1,020	8,760	<0.001	<0.001
Toluene	0.0034	lb/10 ⁶ scf	AP-42 Chapter 1.4	0.25	1,020	8,760	<0.001	<0.001
Pb	0.0005	lb/10 ⁶ scf	AP-42 Chapter 1.4	0.25	1,020	8,760	<0.001	<0.001
со	84	lb/10 ⁶ scf	AP-42 Chapter 1.4	0.25	1,020	8,760	0.02	0.09
NOx	100	lb/10 ⁶ scf	AP-42 Chapter 1.4	0.25	1,020	8,760	0.02	0.11
PM ₁₀	7.6	lb/10 ⁶ scf	AP-42 Chapter 1.4	0.25	1,020	8,760	0.002	0.01
SO ₂	0.6	lb/10 ⁶ scf	AP-42 Chapter 1.4	0.25	1,020	8,760	<0.001	<0.001
CO ₂	53.06	kg CO ₂ / MMBtu	40 CFR Subpart C	0.25	1,020	8,760	29.24	128.09
CH ₄	0.001	kg CH ₄ / MMBtu	40 CFR Subpart C	0.25	1,020	8,760	<0.001	0.00
N ₂ O	0.0001	kg N ₂ O / MMBtu	40 CFR Subpart C	0.25	1,020	8,760	<0.001	<0.001
Total HAPs							<0.001	0.002
Total CO ₂ e							29.27	128.22

Notes:

- Emission rates displayed above represent the maximum hourly and maximum annual emissions for one reboiler.

- Greenhouse Gas Emissions are calculated using 40 CFR 98 Subpart C Table C-1 and C-2 emission factors.

- AP-42, Chapter 1.4 references are from the July 1998 revision.

⁻ Max. Annual Emissions based upon Max. Hourly Emissions @ 8760 hr/yr.

- CO₂ equivalency solved for using Global Warming Potentials found in 40CFR98 Table A-1 (Updated January 2014). GWP CO₂=1, GWP CH₄=25, GWP N₂O=298

Example Equations:

Max. Hourly Emission Rate (lb/hr) = Emission Factor (lb/10⁶ scf) ÷ Heating Value of Natural Gas (Btu/scf) × Boiler Rating (MMBtu/hr)

								Total P	oca T Emissi	on Levels										
								- · ·	(a											
							Proposed	Equipment	(Corrected	Reboiler Bu	irner Rating	g)								
	VOCs HAPs CO NO _x PM SO ₂ CO ₂ CH ₄ N ₂ O												0	CO2e						
Emission Sources	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Reboiler 0.25 mmBtu/hr (RVB-1)	0.00	0.01	< 0.001	0.00	0.02	0.09	0.02	0.11	0.00	0.01	< 0.001	< 0.001	29.24	128.09	<0.001	0.00	<0.001	<0.001	29.27	128.22
						•		•			•							•		
								Previ	ous PTE - G3	5-A090										
		-			-	_	-	-			-	-		-						
	VO			APs .		0		IO _x	PI			0 ₂		0 ₂		H ₄	N ₂			D ₂ e
Emission Sources	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Ajax DPC-360 - 346 hp (ENG-1)	1.61	7.01	0.23	1.01	1.07	4.68	4.81	21.03	-	-	-	-	-	-	-	-	-	-	-	-
Reboiler 0.18 mmBtu/hr (RVB-1) - Update	< 0.001	0.00	<0.001	0.00	0.02	0.07	0.02	0.08	0.000	0.01	< 0.001	<0.001	21.06	92.22	<0.001	0.00	<0.001	<0.001	21.08	92.32
TEG Dehy Still Vent (RSV-1)	1.98	8.66	1.11	4.81	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Totals	3.59	15.67	1.34	5.82	1.09	4.75	4.83	21.11	0.00	0.01	0.00	0.00	21.06	92.22	0.00	0.00	0.00	0.00	21.08	92.32
									Net Chang	e										
					1						1									
	VO			Ps	-	0		IO _x	PI		SO ₂		CO ₂			H ₄	N ₂			D ₂ e
Emission Sources	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
NET CHANGE	0.00	0.01	0.00	0.00	0.00	0.02	0.00	0.03	0.00	0.00	0.00	0.00	8.18	35.87	0.00	0.00	0.00	0.00	8.19	35.90
								Proposed	Facility Wid	e Emission	s									
											-									
	VO	Cs	HA	APs .	C	0	Ν	IO _x	PI	М	S	02	C	02	CI	H ₄	N ₂	0	cc	D ₂ e
Emission Sources	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
Ajax DPC-360 - 346 hp (ENG-1)	1.61	7.01	0.23	1.01	1.07	4.68	4.81	21.03	-	-	-	-	-	-	-	-	-	-	-	-
Reboiler 0.25 mmBtu/hr (RVB-1)	0.00	0.01	< 0.001	0.00	0.02	0.09	0.02	0.11	0.00	0.01	< 0.001	< 0.001	29.24	128.09	< 0.001	0.00	< 0.001	< 0.001	29.27	128.22
TEG Dehy Still Vent (RSV-1)	1.98	8.66	1.11	4.81	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Totals	3.59	15.68	1.34	5.82	1.09	4.77	4.83	21.14	0.00	0.01	0.00	0.00	29.24	128.09	0.00	0.00	0.00	0.00	29.27	128.

ATTACHMENT J

CLASS I LEGAL ADVERTISEMENT

Attachment J

AIR QUALITY PERMIT NOTICE Notice of Application

Notice is given that Cranberry Pipeline Corporation has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a General Permit G35-A Class II Administrative Update for a natural gas production operation located in McDowell County, West Virginia. The latitude and longitude coordinates are: 37.27665 and -81.60223.

The applicant estimates the maximum potential to discharge the following regulated air pollutants on a facility-wide basis will be:

Particulate Matter (PM) = 0.01 tpy Volatile Organic Compounds (VOC) = 15.68 tpy Carbon Monoxide (CO) = 4.77 tpy Nitrogen Oxides (NO_x) = 21.14 tpy Hazardous Air Pollutants (HAPs) = 5.82 tpy Carbon Dioxide Equivalents (CO₂e) = 128.2 tpy

Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th 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 1250, during normal business hours.

Dated this the Xth day of October 2015.

By: Cranberry Pipeline Corporation Randy Spencer Safety and Environmental Manager 900 Lee Street East, Suite 1500 Charleston, WV 25301

ATTACHMENT K

ELECTRONIC SUBMITTAL

NOT APPLICABLE

ATTACHMENT L

GENERAL PERMIT REGISTRATION APPLICATION FEE

Attachment L G70-A General Permit Application Fee

An application fee of \$300.00 is being submitted by Cranberry Pipeline Corporation with this G35-A Class II Administrative Update Permit Application.

ATTACHMENT M

SITTING CRITERIA WAIVER

NOT APPLICABLE

ATTACHMENT N

SAFETY DATA SHEETS (SDS)

NOT APPLICABLE

ATTACHMENT O

EMISSION SUMMARY SHEETS

Attachment O G35-A EMISSION SUMMARY SHEET

Emission Point ID No. (Must match Emission Units Table-& Plot Blop)		Throu (Must match	on Unit Vented Igh This Point <i>Emission Units Table</i> <i>Plot Plan)</i>	ם (Mu Emission U	ution Control Device Ist match Inits Table & Plot Plan)	All Regulated Pollutants - Chemical Name/CAS ³	Maximum Potential Uncontrolled Emissions ⁴		Maximum Controlled I	Potential Emissions ⁵	Emission Form or Phase (At exit	Est. Method Used ⁶
Plot Plan)		ID No.	Source	ID No.	Device Type	(Speciate VOCs & HAPS)	lb/hr	ton/yr	lb/hr	ton/yr	conditions, Solid, Liquid or Gas/Vapor)	
E01	Upward Vertical Stack	ENG-1	Compressor Engine	N/A	N/A	Total VOCs Total HAPs CO NO _x	1.61 0.23 1.07 4.81	7.01 1.01 4.68 21.03	N/A	N/A	Gas/ Vapor	OTHER- G35-A090
E02	Upward Vertical Stack	RSV-1	Glycol Dehydrator Still Vent	N/A	N/A	Total VOCs Total HAPs	1.98 1.11	8.66 4.81	N/A	N/A	Gas/Vapor	OTHER- G35-A090
E03	Upward Vertical Stack	RBV-1	Glycol Dehydrator Reboiler	N/A	N/A	Total VOCs CO NO _x PM CO ₂ CO ₂ e	<0.01 0.02 0.02 <0.01 29.24 29.27	0.01 0.09 0.11 0.01 128.09 128.22	N/A	N/A	Gas/Vapor	EE

The EMISSION 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 EMISSIONS 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.

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

² List all regulated air pollutants. Speciate VOCs, including all HAPs. Follow chemical name with Chemical Abstracts Service (CAS) number. LIST Acids, CO, CS₂, VOCs,

H₂S, Inorganics, Lead, Organics, O₃, NO, NO₂, SO₂, SO₃, all applicable Greenhouse Gases (including CO₂ and methane), etc. **DO NOT LIST** H₂, H₂O, N₂, O₂, and Noble Gases

³ 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).

⁴ 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).

⁵ Indicate method used to determine emission rate as follows: MB = material balance; ST = stack test (give date of test); EE = engineering estimate; M = modeling; O = other (specify).