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**west virginia department of environmental protection**

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## **ENGINEERING EVALUATION / FACT SHEET**

### **BACKGROUND INFORMATION**

Application No.: R13-3087  
Plant ID No.: 051-00138  
Applicant: Williams Ohio Valley Midstream LLC  
Facility Name: Bryan Compressor Station  
Location: Near Woodlands, Marshall County  
NAICS Code: 213112  
Application Type: Modification  
Received Date: June 5, 2013  
Engineer Assigned: Joe Kessler  
Fee Amount: \$4,500  
Date Received: June 12, 2013 (\$2,000)  
July 10, 2013 (\$2,500)  
Complete Date: July 18, 2013  
Due Date: October 16, 2013  
Applicant's Ad Date: June 4, 2013  
Newspaper: *Moundsville Daily Echo*  
UTM's: Easting: 519.257 km Northing: 4,402.919 km Zone: 17  
Latitude/Longitude: 39.77599/-80.77513  
Description: Construction of a natural gas compressor station.

On April 12, 2011 Williams Ohio Valley Midstream LLC (Williams) was issued General Permit Registration G35-A050 for the construction of the Bryan Compressor Station. Williams' now wishes to re-permit the facility under a 45CSR13 non-general construction permit. As such, this review will evaluate the entire facility.

### **DESCRIPTION OF PROCESS/MODIFICATIONS**

Williams Ohio Valley Midstream LLC (Williams) is proposing to re-permit an existing natural gas compressor station located in a rural area of Marshall County approximately 3.1 miles southeast of Woodlands, WV. The as-modified Bryan Compressor Station will consist of one (1) Ajax DPC-2802LE 2-Stroke Lean Burn (2SLB) 400 horsepower (hp) compressor engine, one (1) KW International 5.0 mmscf/day triethylene glycol (TEG) dehydration unit (GDU), and one (1) 210 bbl produced liquids storage tank.

Raw natural gas enters into the facility and, after passing through an inlet separator to removed produced liquids, is compressed by the engine. Produced water removed from the natural gas is directed to the 8,820 gallon storage tank (T01). Emissions from the storage tank (working/breathing/flashing) will not be controlled.

The engine (CE-01) is designed to compress the natural gas and send it through the GDU for dehydration and then into a gathering pipeline for transport. The engine proposed for the Bryan Compressor Station (the existing engine currently at the site) is uncontrolled.

Glycol dehydration is a liquid desiccant system used for the removal of water from natural gas. Lean, water-free glycol is fed to the top of an absorber (known as a "contactor") where it is contacted with the wet natural gas stream. The glycol removes water from the natural gas by physical absorption and is carried out the bottom of the column. The dry natural gas leaves the top of the absorption column and is fed into a pipeline for transportation.

After leaving the absorber, the glycol stream - now referred to as "rich" glycol - is fed to a flash vessel (RSV-1) where a majority of the hydrocarbon vapors are removed and sent to the 0.2 mmBtu/hr reboiler (RBV-1) and used as a fuel (a minimum of 50% and expected up to 85% of total flash gases produced). The remaining flash tank off-gases are emitted uncontrolled into the atmosphere. It is estimated that combustion in the reboiler would, at a minimum, destroy 95% of the hydrocarbons in the off-gases. Any liquid hydrocarbons removed in the flash tank are sent to the storage tank. After leaving the flash vessel, the rich glycol is fed to the Glycol Regenerator Column (RSV-1). The Regenerator Column consists of a column, an overhead condenser, and the reboiler. The glycol is thermally regenerated to remove excess water and regain high purity. The hydrocarbons produced in the glycol regeneration process are uncontrolled and exhausted to the atmosphere. Additionally, the GDU contains several TEG storage tanks. However, the storage tanks are defined as *de minimis* sources under Table 45-13B of 45CSR13 as they are each less than 10,000 gallons and TEG has an extremely low vapor pressure (<0.01 mm Hg).

The hot, lean glycol is cooled by the heat-exchanger and is then fed to a pump where it is sent to the glycol absorber for reuse. Liquids produced in the regeneration process are sent to the storage tank.

Additionally, the facility will utilize a truck loadout (TLO) to remove produced water from the site (estimated to be a maximum of 106,000 gallons/year).

## **SITE INSPECTION**

On July 16, 2013, the writer conducted an inspection of the Bryan Compressor Station. The Bryan site is located in a rural area of Marshall County approximately 3.1 miles southeast of Woodlands, WV off of Rines Ridge Road (County Route (CR) 76). The writer was accompanied on the inspection by Ms. Danell Zawaski, Environmental Specialist with Williams. Observations from the inspection include:

- Co-located on the site of the Bryan Compressor Station is an existing (inactive at the time

of the inspection) well-pad and natural gas production facility owned and operated by Chevron Appalachia, LLC;

- The existing Williams' compressor engine (Ajax DPC-2802LE) was in operation at the time of the inspection and running at what appeared to be a low rate; and
- The nearest occupied residence is approximately 0.3 miles east of the facility.

*Directions:* [Latitude: 39.77599, Longitude: -80.77513] Traveling north on United States Route (US) 2, turn right at the mouth of Fish Creek onto Woodland and Graysville Road (CR 27). Proceed 1.0 miles and turn right onto Rines Ridge Road (CR76). After 4.2 miles, the facility access road is on the right.

## **AIR EMISSIONS AND CALCULATION METHODOLOGIES**

### ***Compressor Engine***

Potential emissions from the Ajax DPC-2802LE 2SLB 400 hp compressor engine (1E) were based emission factors provided by the engine manufacturer, as given in AP-42, Section 3.2 (AP-42 is a database of emission factors maintained by USEPA), and provided in 40 CFR 98, Subpart C. Hourly emissions were based on the (as calculated using a fuel heat rating of 1,022 Btu/ft<sup>3</sup>) maximum design heat input (MDHI) of the engine of 3.47 mmBtu/hr and the maximum hp rating of the engine. Annual emissions were based on 8,760 hours of operation per year. The following table details the potential-to-emit (PTE) of the Ajax compressor engine:

**Table 1: Ajax DPC-2802LE PTE**

<b>Pollutant</b>	<b>Emission Factor</b>	<b>Source</b>	<b>Hourly (lb/hr)</b>	<b>Annual (ton/yr)</b>
CO	1.20 g/hp-hr	Engine Vendor	1.06	4.64
NO <sub>x</sub>	2.00 g/hp-hr	Engine Vendor	1.76	7.73
PM <sub>2.5</sub> <sup>(1)</sup>	48.31 x 10 <sup>-3</sup> lb/mmBtu	AP-42, Table 3.2-1	0.17	0.73
PM <sub>10</sub> <sup>(1)</sup>	48.31 x 10 <sup>-3</sup> lb/mmBtu	AP-42, Table 3.2-1	0.17	0.73
PM <sup>(1)</sup>	48.31 x 10 <sup>-3</sup> lb/mmBtu	AP-42, Table 3.2-1	0.17	0.73
SO <sub>2</sub>	5.88 x 10 <sup>-4</sup> lb/mmBtu	AP-42, Table 3.2-1	~0.00	~0.00
VOCs	0.8 g/hp-hr	Engine Vendor	0.71	3.09
Total HAPs	Various	Engine Vendor AP-42, Table 3.2-1	0.35	1.53
Formaldehyde	0.30 g/hp-hr	Engine Vendor	0.26	1.16
CH <sub>4</sub>	5.10 g/hp-hr	Engine Vendor	4.50	19.70

Pollutant	Emission Factor	Source	Hourly (lb/hr)	Annual (ton/yr)
N <sub>2</sub> O	1.0 x 10 <sup>-4</sup> kg/mmBtu	40 CFR Part 98, Subpart C, Table C-2	~0.00	~0.00
CO <sub>2</sub>	110 lb/mmBtu	AP-42, Table 3.2-1	381.70	1,671.85
CO <sub>2</sub> e <sup>(2)</sup>	n/a	n/a	n/a	2,085.52

- (1) Includes condensables.
- (2) Based on multiplying the mass amount of emissions for each of the six greenhouse gases by the gas's associated global warming potential published at Table A-1 to Subpart A of 40 CFR Part 98 - Global Warming Potentials. Used to determine major source status of facilities under 45CSR14.

### ***Glycol Regenerator Column***

VOC, Hazardous Air Pollutant (HAP), and methane emissions from the glycol regenerator still vent (4E) are based on the emissions calculation program GRI-GLYCalc Version 4.0. GRI-GLYCalc is a well-known program for estimating air emissions from GDUs using triethylene glycol (TEG). Included in the application is a copy of the appropriate GLY-Calc analysis sheets. All emissions calculated by GRI-GLYCalc have been increased by a 20% safety factor to account for any future variability in input gas. As noted above, the GDU Still Vent is uncontrolled. Inputs into GRI-GLYCalc were based on a gas analysis performed at the Carmichael Compressor Station on November 6, 2009. The PTE of the Glycol Regenerator Column is given in the following table:

**Table 2: GDU PTE**

Pollutant	Emission Factor	Source	Hourly (lb/hr)	Annual (ton/yr)
<b>VOC</b>	<b>n/a</b>	<b>GLYCalc Results</b>	<b>2.54</b>	<b>11.12</b>
<i>Hexane</i>	<i>n/a</i>	<i>GLYCalc Results</i>	<i>0.04</i>	<i>0.16</i>
<i>Benzene</i>	<i>n/a</i>	<i>GLYCalc Results</i>	<i>0.08</i>	<i>0.34</i>
<i>Toluene</i>	<i>n/a</i>	<i>GLYCalc Results</i>	<i>0.25</i>	<i>1.11</i>
<i>Ethyl-benzene</i>	<i>n/a</i>	<i>GLYCalc Results</i>	<i>0.09</i>	<i>0.39</i>
<i>Xylene</i>	<i>n/a</i>	<i>GLYCalc Results</i>	<i>0.48</i>	<i>2.09</i>
<b>Total HAPs →</b>			<b>0.94</b>	<b>4.10</b>
CH <sub>4</sub>	n/a	GLYCalc Results	0.19	0.82
CO <sub>2</sub> e	<b>n/a</b>	<b>n/a</b>	<b>n/a</b>	<b>17.15</b>

### ***Dehydrator Flash Tank Off Gas***

Uncontrolled VOC, Hazardous Air Pollutant (HAP), and methane emissions from the dehydrator flash tank off gases (also given emission point 4E although gases emitted from reboiler stack and direct to atmosphere from tank) are based on the emissions calculation program GRI-GLYCalc Version 4.0. Included in the application is a copy of the appropriate GLY-Calc analysis

sheets. As noted above, an estimated 85% of the uncontrolled emissions from the GDU Flash Tank are sent to the reboiler and used as a fuel (where it is expected that a minimum reboiler combustion efficiency of 95% would control the hydrocarbons) and the rest vented to atmosphere uncontrolled. Based on this, the expected aggregate control efficiency of the flash tank off gases would be 80.75% (1- (15% + 85%\*(1-95%))). However, to be conservative, Williams used an aggregate control efficiency of 50% in GRI-GLYCalc to estimate the aggregate (controlled + uncontrolled) emissions from the flash tank. All emissions were then increased by a 20% safety factor to account for any future variability in input gas.

The aggregate PTE of emissions generated by the dehydrator flash tank off gases, as emitted from the reboiler exhaust stack and directly to the atmosphere from the flash tank, is given in the following table:

**Table 3: Dehydrator Flash Tank Off Gas PTE**

Pollutant	Emission Factor	Source	Hourly (lb/hr)	Annual (ton/yr)
VOC	n/a	GLYCalc Results	4.00	17.50
Hexane	n/a	GLYCalc Results	0.09	0.38
Benzene	n/a	GLYCalc Results	0.01	0.03
Toluene	n/a	GLYCalc Results	0.02	0.07
Ethyl-benzene	n/a	GLYCalc Results	0.00	0.01
Xylene	n/a	GLYCalc Results	0.01	0.06
<b>Total HAPs →</b>			<b>0.13</b>	<b>0.55</b>
CH <sub>4</sub>	n/a	GLYCalc Results	13.06	57.19
CO <sub>2</sub> e	n/a	n/a	n/a	1,200.90

**Reboiler Combustion Exhaust Emissions**

Combustion emissions from the 0.20 mmBtu/hr reboiler (3E) were based on the emission factors provided for natural gas combustion as given in AP-42 Section 1.4 and, for GHGs, on the emission factors provided under 40 CFR 98, Subpart C. Although the emission factors are given for natural gas combustion, they may be used for a reasonable estimation for the emissions from combustion of the GDU Flash Tank off gases. Hourly emissions were based on the MDHI of the unit (0.20 mmBtu/hr) and annual emissions were based on an annual operation of 8,760 hours. A natural gas heat content value of 1,020 Btu/ft<sup>3</sup> was used in the calculations.

The PTE generated by the reboiler’s combustion exhaust and the emission factor/emission factor source are given in the following table:

**Table 4: Reboiler Combustion Exhaust PTE**

Pollutant	Emission Factor	Source	Hourly (lb/hr)	Annual (ton/yr)
NO <sub>x</sub>	100 lb/mmscf	AP-42, Table 1.4-1	0.02	0.10
CO	84 lb/mmscf	AP-42, Table 1.4-1	0.02	0.08
CH <sub>4</sub>	2.25 lb/mmscf	40 CFR Part 98, Subpart C, Table C-2	~0.00	~0.00
N <sub>2</sub> O	0.22 lb/mmscf	40 CFR Part 98, Subpart C, Table C-2	~0.00	~0.00
CO <sub>2</sub>	119,518 lb/mmscf	40 CFR Part 98, Subpart C, Table C-1	26.00	113.88
CO <sub>2e</sub>	n/a	n/a	26.00	113.88

### *Storage Tanks*

Uncontrolled VOC and Hazardous Air Pollutant (HAP) emissions from the produced water tank (5E) were calculated using EPA emission factors (working/breathing losses) as provided under document “EPA-450/3-85-001 - VOC Emissions from Petroleum Refinery Wastewater Systems” and using the ProMax Simulation Software (flashing losses). Annual emissions were based on a maximum throughput of 105,840 gallons/year.

ProMax software is chemical process simulator for design and modeling of amine gas treating and glycol dehydration units. Based on a detailed input gas analysis and the components of the facility, the software can simulate and model the inputs and outputs of the system. When run for Bryan (based on a gas sample taken at Carmichael Compressor Station on November 6, 2009), it shows almost all the liquids produced at the facility is water with little to no condensate. Based on this, only insignificant emissions would be expected from the storage tank. To provide a conservative estimate, Williams used an emission factor of 0.039 lb-VOC/bbl from the above EPA document for the working/breathing losses and a ProMax generated emission factor of 0.039 lb-VOC/bbl for the flashing losses.

### *Fugitives*

Williams calculated three sources of fugitive emissions at the proposed Bryan Compressor Station: equipment leaks, maintenance and emergency events, and truck loadouts.

#### Equipment Leaks

Williams based their VOC and methane fugitive equipment leak calculations on emission factors taken from the document EPA-453/R-95-017 - “Protocol for Equipment Leak Emission Estimates” Table 2-4 (VOCs). No control efficiencies, as based on a Leak Detection and Repair (LDAR) protocol, was applied. Component counts were based, according to Williams, on the “default counts for compressor stations (GRI-GLYCalc).”

#### Startup, Shutdown and Maintenance Events

Williams also included in their fugitive emission estimate a certain number of scenarios where natural gas is released for emergency or maintenance purposes. Those included were compressor blowdowns (208 events/year) and cold-start engine startups (208 events/year). VOC and methane emissions from these events were based on conservative

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methane/VOCs/hexane/benzene percentages in the natural gas.

### Truck Loadouts

Air emissions from produced water truck loading operations occur as fugitive emissions generated by displacement of vapors when loading trucks. The emission factor used to generate the VOC emissions is based on Equation (1) of AP-42 Section 5.2-4. In this equation, Williams used variables specific to the liquids loaded and to the method of loading - in this case “splash loading - dedicated normal service.” Annual emissions were based on a maximum loading rate of 106,000 gallons/year of produced water. As no maximum hourly pumping rate was provided, hourly emissions were based on 1,000 hours of loading per year.

### *Emissions Summary*

Based on the above estimation methodologies, which are determined to be reasonable, the PTE of the proposed Bryan Compressor Station is given in the following tables:

**Table 5: Facility-Wide Aggregate Hourly (lb/hr) Criteria Pollutant PTE Summary.**

Source	Emission Point	CO	NO <sub>x</sub>	PM <sup>(1)</sup>	SO <sub>2</sub>	VOCs	HAPs
Ajax Engine	1E	1.06	1.76	0.17	~0.00	0.71	0.35
GDU Still Vent	4E	0.00	0.00	0.00	0.00	2.54	0.94
GDU Flash Tank <sup>(2)</sup>	Reboiler (3E)	0.00	0.00	0.00	0.00	4.00	0.13
Combustion Exhaust		0.02	0.02	~0.00	~0.00	~0.00	~0.00
Storage Tanks	5E	0.00	0.00	0.00	0.00	0.02	0.01
Equipment Leaks	Fugitive	0.00	0.00	0.00	0.00	0.72	0.07
Plant Events <sup>(3)</sup>	Fugitive	0.00	0.00	0.00	0.00	n/a	n/a
Truck Loading	Fugitive	0.00	0.00	0.00	0.00	0.13	0.00
<b>Facility-Wide Totals →</b>		<b>1.08</b>	<b>1.78</b>	<b>0.17</b>	<b>0.00</b>	<b>8.12</b>	<b>1.50</b>

(1) All particulate matter emissions are assumed to be less than 2.5 microns and include condensables.

(2) This includes uncontrolled emissions to the atmosphere at the tank.

(3) These events will result in very large short-term emissions that occur very infrequently.

**Table 6: Facility-Wide Aggregate Annual (ton/yr) Criteria Pollutant/GHG PTE Summary.**

Source	Emission Point	CO	NO <sub>x</sub>	PM <sup>(1)</sup>	SO <sub>2</sub>	VOCs	HAPs	CO <sub>2</sub> e
Ajax Engine	1E	4.64	7.73	0.73	~0.00	3.09	1.53	2,086
GDU Still Vent	3E	0.00	0.00	0.00	0.00	11.12	4.10	17
GDU Flash Tank	Reboiler	0.00	0.00	0.00	0.00	17.50	0.55	1,201
Combustion Exhaust		0.10	0.08	~0.00	~0.00	~0.00	~0.00	114

Source	Emission Point	CO	NO <sub>x</sub>	PM <sup>(1)</sup>	SO <sub>2</sub>	VOCs	HAPs	CO <sub>2</sub> e
Storage Tanks	4E	0.00	0.00	0.00	0.00	0.14	0.03	6
Equipment Leaks	Fugitive	0.00	0.00	0.00	0.00	3.17	0.32	333
Plant Events	Fugitive	0.00	0.00	0.00	0.00	4.48	0.38	398
Truck Loading	Fugitive	0.00	0.00	0.00	0.00	0.25	0.06	0
<b>Facility-Wide Totals →</b>		<b>4.74</b>	<b>7.81</b>	<b>0.73</b>	<b>0.00</b>	<b>39.75</b>	<b>6.97</b>	<b>4,154</b>

- (1) All particulate matter emissions are assumed to be less than 2.5 microns. Includes condensables.  
(2) This includes uncontrolled emissions to the atmosphere at the tank.

**Table 7: Facility-Wide Aggregate Annual (ton/yr) Speciated HAP PTE Summary<sup>(1)</sup>**

Pollutant	ton/yr
Formaldehyde	1.16
Hexane	0.93
Benzene	0.48
Toluene	1.24
Xylene	2.30
Ethylbenzene	0.45
Other HAPs	0.41
<b>Total HAPs</b>	<b>6.97</b>

- (1) As the PTE of all individual HAPs are less than 10 TPY and the PTE of total HAPs is less than 25 TPY, the proposed Bryan Compressor Station is defined as a minor (area) source of HAPs for purposes of 40 CFR 61, 40CFR63, and Title V.

## **REGULATORY APPLICABILITY**

The proposed Bryan Compressor Station is subject to the following substantive state and federal air quality rules and regulations: 45CSR2, 45CSR13, 40 CFR 60 Subpart JJJJ, 40 CFR 63 Subpart HH, and 40 CFR 63, Subpart ZZZZ. Each applicable rule (and those that have questionable non-applicability) and Williams's compliance therewith is discussed in detail below.

### ***45CSR2: To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers***

Pursuant to the definition of “fuel burning unit” under 45CSR2 (“producing heat or power by indirect heat transfer”), 45CSR2 does not apply to the compressor engine.

The GDU Reboiler has been determined to meet the definition of a “fuel burning unit” under 45CSR2 and is, therefore, subject to the applicable requirements therein. However, pursuant to the exemption given under §45-2-11, as the MDHI of the GDU Reboiler is less than 10 mmBtu/hr, the unit is not subject to sections 4, 5, 6, 8 and 9 of 45CSR2. The only remaining substantive

requirement is under Section 3.1 - Visible Emissions Standards.

Pursuant to 45CSR2, Section 3.1, the reboiler is subject to an opacity limit of 10%. Proper maintenance and operation of the reboiler (and the use of GDU Flash Tank off-gases/natural gas as fuel) should keep the opacity of the unit well below 10% during normal operations.

***45CSR10: To Prevent and Control Air Pollution from the Emission of Sulfur Oxides - (NON APPLICABILITY)***

Pursuant to the definition of “fuel burning unit” under 45CSR10 (“producing heat or power by indirect heat transfer”), the limitations on fuel burning units under 45CSR10 do not apply to the compressor engine.

45CSR10 has requirements limiting SO<sub>2</sub> emissions from “fuel burning units,” limiting in-stack SO<sub>2</sub> concentrations of “manufacturing processes,” and limiting H<sub>2</sub>S concentrations in process gas streams. The only potential applicability of 45CSR10 to the Bryan Compressor Station is the limitations on fuel burning units. The GDU Reboiler has been determined to meet the definition of a “fuel burning unit” under 45CSR10. However, pursuant to the exemption given under §45-10-10.1, as the MDHI of the GDU Reboiler is less than 10 mmBtu/hr, the unit is not subject to the limitations on fuel burning units under 45CSR10.

***45CSR13: 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***

The Bryan Compressor Station has a potential to emit in excess of six (6) lbs/hour and ten (10) TPY of a regulated pollutant and, therefore, pursuant to §45-13-2.24, the facility is defined as a “stationary source” under 45CSR13. Pursuant to §45-13-5.1, “[n]o person shall cause, suffer, allow or permit the construction . . . and operation of any stationary source to be commenced without . . . obtaining a permit to construct.” Therefore, Williams is required to obtain a permit under 45CSR13 for the construction and operation of the facility (although technically this application is a modification of the existing facility, as Bryan is being re-permitted under a non-general 45CSR13 permit, this evaluation is concerned with the facility as a whole).

As required under §45-13-8.3 (“Notice Level A”), Williams placed a Class I legal advertisement in a “newspaper of general circulation in the area where the source is . . . located.” The ad ran on June 4, 2013 in the *Moundsville Daily Echo* and the affidavit of publication for this legal advertisement was submitted prior to July 18, 2013.

***45CSR14/45CSR19 (Non-Applicability)***

The Bryan Compressor Station is proposed to be located in Marshall County, WV. Marshall County is classified as “in attainment” with all National Ambient Air Quality Standards except PM<sub>2.5</sub> and SO<sub>2</sub>. Therefore, as the facility is not a “listed source” under §45-14-2.43, the individual major

source applicability threshold for all pollutants except PM<sub>2.5</sub> NO<sub>x</sub> (a defined precursor of PM<sub>2.5</sub>) and SO<sub>2</sub> is 250 TPY (and pursuant to 2.80(e)(1), 100,000 TPY of CO<sub>2</sub>e). Pursuant to §45-19-2.35, the major source applicability threshold for PM<sub>2.5</sub>, NO<sub>x</sub>, and SO<sub>2</sub> is 100 TPY. As given above in Table 6, the facility-wide PTE of the proposed Bryan Compressor Station is less than 100 TPY TPY for all criteria pollutants and less than 100,000 TPY of CO<sub>2</sub>e. Therefore, the facility is not defined as a "major stationary source" under either 45CSR14 or 45CSR19 and the rules do not apply.

### Potential Source Aggregation

Classifying multiple facilities as one "stationary source" under 45CSR13, 45CSR14, and 45CSR19 is based on the definition of "Building, structure, facility, or installation" as given in §45-14-2.13 and §45-19-2.12. The definition states:

"Building, Structure, Facility, or Installation" means all of the pollutant-emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control). Pollutant-emitting activities are a part of the same industrial grouping if they belong to the same "Major Group" (i.e., which have the same two (2)-digit code) as described in the Standard Industrial Classification Manual, 1987 (United States Government Printing Office stock number GPO 1987 0-185-718:QL 3).

As noted above, the proposed Bryan station is co-located on a site with a well-pad (and associated production facility) owned and operated by Chevron Appalachia, LLC. The application included an analysis of a potential "one-source" classification of the existing well-pad and the proposed compressor station. The Williams' analysis, determined to be reasonable by the DAQ, indicates that while the two facilities do belong to the same industrial grouping and are located on one or more contiguous or adjacent properties, the facilities are not under control of the same person (or persons under common control).

### ***45CSR30: Requirements for Operating Permits - (NON APPLICABILITY)***

45CSR30 provides for the establishment of a comprehensive air quality permitting system consistent with the requirements of Title V of the Clean Air Act. The proposed Bryan Compressor Station does not meet the definition of a "major source under §112 of the Clean Air Act" as outlined under §45-30-2.26 and clarified (fugitive policy) under 45CSR30b. The proposed facility-wide PTE of any regulated pollutant does not exceed 100 TPY (and, in the case of CO<sub>2</sub>e, does not exceed 100,000 TPY). Additionally, the facility-wide PTE does not exceed 10 TPY of any individual HAP or 25 TPY of aggregate HAPs.

However, as the facility is subject to a New Source Performance Standard (NSPS) - 40 CFR 60, Subpart JJJJ - and a Maximum Achievable Control Technology (MACT) rule - 40 CFR 63, Subpart HH, the facility would, in most cases, be subject to Title V as a "deferred source." However, pursuant to §60.4230(c) and §63.760(h) as a non-major "area source," Williams is not required to obtain a Title V permit for the proposed facility. Therefore, the Bryan Compressor Station is not subject to 45CSR30.

### ***40 CFR 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 - (NON APPLICABILITY)***

Pursuant to §60.110b, 40 CFR 60, Subpart Kb applies to "each storage vessel with a capacity

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greater than or equal to 75 cubic meters (m<sup>3</sup>) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.” The storage tank proposed for the Bryan Compressor Station is 8,820 gallons, or 33 m<sup>3</sup>. Therefore, Subpart Kb does not apply to the storage tank.

***40 CFR 60 Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engine.***

Williams’s Ajax DPC-2802LE 2SLB 400 hp compressor engine proposed for the Bryan Compressor Station is defined under 40 CFR 60, Subpart JJJJ as stationary spark-ignition internal combustion engine (SI ICE) but is not, pursuant to §60.4230(a)(4)(iii), subject to the applicable provisions of the rule as the engine was manufactured, according to information provided in the permit application, on July 20, 2006 (before the applicability date for RICE <500 hp of July 1, 2008).

***40 CFR 60, Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution - (NON APPLICABILITY)***

On April 27, 2012, the USEPA issued a final rule (Federal Register Date: August 16, 2012) that consists of federal air standards for natural gas wells that are hydraulically fractured, along with requirements for several other sources of pollution in the oil and gas industry that currently are not regulated at the federal level. Each potentially applicable section of Subpart OOOO is discussed below.

Compressor Engine (NON APPLICABILITY)

Pursuant to §60.5365(c), “[e]ach reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment” that commenced construction, modification or reconstruction after August 23, 2011 is subject to the applicable provisions of Subpart OOOO. As the compressor engine proposed for Bryan was manufactured prior to August 23, 2011, the engine is not subject to the requirements of OOOO.

Pneumatic Controllers (NON APPLICABILITY)

Pursuant to §60.5365(d)(2), “[f]or the natural gas production segment (between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not including natural gas processing plants), each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh” that is constructed after August 23, 2011 is subject to the applicable provisions of Subpart OOOO. As the Bryan Compressor Station is located before the point of custody transfer, any pneumatic controllers that meet the above definition is required to meet the substantive requirement for pneumatic controllers as given under §60.5390. However, Williams has stated that no pneumatic controllers will have a bleed rate in excess of 6 scfh.

Storage Tanks (NON APPLICABILITY)

Pursuant to §60.5365(e), for “[e]ach storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment” that is constructed after August 23, 2011 and, pursuant to §60.5395 has “VOC emissions equal to or greater than 6 tpy” must meet the control requirements under §60.5395 as of October 15, 2013. The substantive requirement is to “reduce VOC emissions by 95.0 percent or greater.” The proposed produced water storage tank does not have VOC emissions greater than 6 TPY so the tank is not subject to the percent-reduction provisions of Subpart OOOO.

***40 CFR 63 Subpart HH: National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities***

On June 1, 2013 the DAQ took delegation of the area source provisions of 40 CFR 63, Subpart HH. Pursuant to §63.760(a)(3), as the Bryan Compressor Station - an area source of HAPs (see Table 7) - “process[es], upgrade[s], or store[s] natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user,” it is defined as an area source subject to the applicable provisions under Subpart HH.

Pursuant to §63.760(b)(2), each TEG GDU located at an area source that meets the requirements under §63.760(a)(3) is defined as an affected facility under Subpart HH. The requirements for affected sources at area sources are given under §63.764(d). However, for a GDU, exemptions to these requirements are given under §63.764(e): if (1) “actual annual average flowrate of natural gas to the glycol dehydration unit is less than 85 thousand standard cubic meters [3 mmscf/day] per day” or (2) “actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram [1 TPY] per year.”

As shown in Tables 3 and 4 above, the maximum PTE of benzene emissions from the GDU process vent is 0.37 TPY. Therefore, the GDU is exempt from the Subpart HH requirements given under §63.764(d) but must meet the compliance demonstration and record-keeping requirements under §63.772(b).

***40 CFR 63 Subpart ZZZZ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engine***

On June 1, 2013 the DAQ took delegation of the area source provisions of 40 CFR 63, Subpart ZZZZ. As the Bryan Compressor Station is defined as an area source of HAPs (see Table 7), the facility is subject to applicable requirements of Subpart ZZZZ. Pursuant to §63.6590(c):

An affected source that meets any of the criteria in paragraphs (c)(1) through (7) of this section must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines or 40 CFR part 60 subpart JJJJ, for spark ignition engines. No further requirements apply for such engines under this part.

§63.6590(c)(1) specifies that “[a] new or reconstructed stationary RICE located at an area

source” is defined as a RICE that shows compliance with the requirements of Subpart ZZZZ by “meeting the requirements of . . . 40 CFR part 60 subpart JJJJ, for spark ignition engines.” Pursuant to §63.6590(a)(2)(iii), a “stationary RICE located at an area source of HAP emissions is new if [the applicant] commenced construction of the stationary RICE on or after June 12, 2006.” The engine proposed for the Bryan Compressor Station is defined as a new stationary RICE and, therefore, will show compliance with Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart JJJJ. Compliance with Subpart JJJJ is discussed above.

**TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS**

This section provides an analysis for those regulated pollutants that may be emitted from the proposed Bryan Compressor Station and that are not classified as “criteria pollutants.” Criteria pollutants are defined as Carbon Monoxide (CO), Lead (Pb), Oxides of Nitrogen (NO<sub>x</sub>), Ozone, Particulate Matter (PM), Particulate Matter less than 10 microns (PM<sub>10</sub>), Particulate Matter less than 2.5 microns (PM<sub>2.5</sub>), and Sulfur Dioxide (SO<sub>2</sub>). These pollutants have National Ambient Air Quality Standards (NAAQS) set for each that are designed to protect the public health and welfare. Other pollutants of concern, although designated as non-criteria and without national concentration standards, are regulated through various federal and programs designed to limit their emissions and public exposure. These programs include federal source-specific Hazardous Air Pollutants (HAPs) limits promulgated under 40 CFR 61 (NESHAPS) and 40 CFR 63 (MACT). Any potential applicability to these programs were discussed above under REGULATORY APPLICABILITY.

The majority of non-criteria regulated pollutants fall under the definition of HAPs which, with some revision since, were 188 compounds identified under Section 112(b) of the Clean Air Act (CAA) as pollutants or groups of pollutants that EPA knows or suspects may cause cancer or other serious human health effects. As noted above, the proposed Bryan Compressor Station has the potential to emit the following HAPs: Hexane, Benzene, Toluene, Ethyl-benzene, Xylene, and Formaldehyde. The following table lists each HAP’s carcinogenic risk (as based on analysis provided in the Integrated Risk Information System (IRIS)):

**Table 9: Potential HAPs - Carcinogenic Risk**

HAPs	Type	Known/Suspected Carcinogen	Classification
Hexane	VOC	No	Inadequate Data
Benzene	VOC	Yes	Category A - Known Human Carcinogen
Toluene	VOC	No	Inadequate Data
Ethyl-benzene	VOC	No	Category D - Not Classifiable
Xylene	VOC	No	Inadequate Data
Formaldehyde	VOC	Yes	B1 - Probable Human Carcinogen

All HAPs have other non-carcinogenic chronic and acute effects. These adverse health affects may be associated with a wide range of ambient concentrations and exposure times and are influenced by source-specific characteristics such as emission rates and local meteorological

conditions. Health impacts are also dependent on multiple factors that affect variability in humans such as genetics, age, health status (e.g., the presence of pre-existing disease) and lifestyle. As stated previously, *there are no federal or state ambient air quality standards for these specific chemicals*. For a complete discussion of the known health effects of each compound refer to the IRIS database located at [www.epa.gov/iris](http://www.epa.gov/iris).

## **AIR QUALITY IMPACT ANALYSIS**

The estimated maximum emissions of the proposed facility are less than applicability thresholds that would define the proposed facility as “major” under 45CSR14 and, therefore, no air quality impacts modeling analysis was required. Additionally, based on the nature and location of the proposed source, an air quality impacts modeling analysis was not required under 45CSR13, Section 7.

## **MONITORING, COMPLIANCE DEMONSTRATIONS, REPORTING, AND RECORDING OF OPERATIONS**

The following substantive monitoring, compliance demonstration, reporting, and record-keeping requirements (MRR) shall be required:

- For the purposes of demonstrating compliance with the maximum wet gas throughput limit set forth in 4.1.4. of the draft permit, Williams shall be required to monitor daily, monthly and rolling twelve month records of the wet gas throughput of the Glycol Dehydration Unit.
- In order to demonstrate compliance with 4.1.5(a) and (b) of the draft permit, upon request of the Director, Williams shall demonstrate compliance with the VOC/HAP emissions thresholds using GLYCalc Version 4.0 or higher. The permittee shall sample in accordance with GPA Method 2166 and analyze the samples utilizing the extended GPA Method 2286 as specified in the GRI-GLYCalc V4 Technical Reference User Manual and Handbook.
- For the purposes of demonstrating compliance with visible emissions limitations set forth in 4.1.6(e) of the draft permit, Williams shall be required to:
  - Conduct an initial Method 22 visual emission observation on the Reboiler exhaust to determine the compliance with the visible emission provisions. Williams shall be required to take a minimum of two (2) hours of visual emissions observations on the units;
  - Conduct monthly Method 22 visible emission observations of the Reboiler exhaust to ensure proper operation for a minimum of ten (10) minutes each month the units are in operation;
  - In the event visible emissions are observed in excess of the limitations given under 4.1.6(e) of the draft permit, Williams shall be required to take immediate corrective action;

- Maintain records of the visible emission opacity tests conducted per Section 4.2.3. of the draft permit; and
- Any deviation(s) from the allowable visible emission requirement for any emission source discovered during observations using 40CFR Part 60, Appendix A, Method 9 or 22 shall be reported in writing to the Director of the Division of Air Quality as soon as practicable, but in any case within ten (10) calendar days of the occurrence and shall include at least the following information: the results of the visible determination of opacity of emissions, the cause or suspected cause of the violation(s), and any corrective measures taken or planned.
- For the purposes of demonstrating compliance with the Reboiler fueling requirements set forth in 4.1.5(c) of the draft permit, Williams shall be required to monitor and record the twelve month rolling amount of GDU Flash Tank off-gases sent to the Reboiler as fuel;
- For the purposes of demonstrating compliance with the truck loadout throughput limit set forth in 4.1.10(b) of the draft permit, Williams shall be required to monitor and maintain monthly and rolling twelve month records of the amount of liquids loaded out; and
- Williams shall be required to meet all applicable Monitoring, Compliance Demonstration and Source-Specific Recordkeeping and Reporting Requirements as given under 45CSR2 and 40 CFR 63, Subpart HH.

### **PERFORMANCE TESTING OF OPERATIONS**

The following substantive performance testing requirements shall be required:

- At such reasonable time(s) as the Secretary may designate, in accordance with the provisions of 3.3 of the draft permit, Williams shall be required to conduct or have conducted test(s) to determine compliance with the emission limitations established in this permit and/or applicable regulations.
- Williams shall be required to meet all applicable Performance Testing Requirements as given under 45CSR2 and 40 CFR 63, Subpart HH.

### **RECOMMENDATION TO DIRECTOR**

The information provided in the permit application indicates that compliance with all applicable state and federal air quality regulations is achieved. Therefore, I recommend to the Director the issuance of a Permit Number R13-3087 to Williams Ohio Valley Midstream LLC for the proposed modification and operation of the Bryan Compressor Station located near Moundsville, Marshall County, WV.

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Joe Kessler, PE  
Engineer

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Date