

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: R30-07900046-2007
Application Received: April 9, 2003
Plant Identification Number: 079-00046
Permittee: Cranberry Pipeline Corporation
Facility Name: Heizer Compressor Station
Mailing Address: 2201 Derricks Creek Road,
Sissonville, WV 25320-9517

Physical Location: Poca, Putnam County, West Virginia
UTM Coordinates: 432.5 km Easting • 4,264.0 km Northing • Zone 17
Directions: From State Route 62 near Poca, turn onto Heizer Creek Road. Travel
approximately 5 miles to the station on the left.

Facility Description

Heizer Compressor Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate twenty-four (24) hours per day, seven (7) days per week, fifty-two (52) weeks per year. The station consists of one (1) TEG dehydrator with flare, one (1) dehydrator reboiler, one (1) 440 HP natural gas compressor engine, one (1) 880 HP natural gas compressor engine and four (4) storage tanks (2,100 gallon pipeline fluids, 3,000 gallon oil, 1,050 gallon oil, and 1,050 gallon anti-freeze).

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	2005 Actual Emissions
Carbon Monoxide (CO)	10.85	3.77
Nitrogen Oxides (NO _x)	147.91	55.51
Particulate Matter (PM ₁₀)	2.17	0.78
Total Particulate Matter (TSP)	2.17	0.78
Sulfur Dioxide (SO ₂)	0.04	0.01
Volatile Organic Compounds (VOC)	18.1	8.19

PM₁₀ is a component of TSP.

Hazardous Air Pollutants**	Potential Emissions	2005 Actual Emissions
Total HAPs*	5.84*	2.90

***Some of the above HAPs may be counted as PM or VOCs.*

* HAPs are not speciated because no applicability was triggered; Total Potential HAPs is after installation of flare (45CSR13 permit requirement).

Title V Program Applicability Basis

This facility has the potential to emit 147.91 tons of NO_x. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Cranberry Pipeline Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Indirect Heat Exchanger
	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
State Only:	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	45CSR4	No objectionable odors.
	45CSR17	Particulate Fugitive

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2694	March 27, 2007	N/A

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Calculations of particulate matter emissions using AP-42 factors for Natural Gas Combustion and Soot Formation at Flares (Sections 1.4-3 and 13.5-1, respectively) indicate that emissions from the flare are only a small fraction (<10%) of the mass limit established by 45CSR6. As a result of this finding and due to the nature of this control device, the visual emissions performance tests as per Section 5.3.1 of the permit may be used as an indicator of compliance with 45CSR6 requirements and shall be sufficient for compliance certification purposes.

According to 45 CSR §2-11, the Reboiler is exempt from MRR (Monitoring, recordkeeping and reporting) requirements because the Reboiler's heat input is less than ten (10) million B.T.U.'s per hour.

According to 45CSR2A, the Reboiler is exempt from 45CSR2 monitoring because the Reboiler combusts only natural gas.

According to the following calculation, compliance with FERC (Federal Energy Regulatory Commission) limit for total sulfur of 20 grains/100 cu.ft will assure compliance with 45CSR10 limit of 2000 ppm SO₂:
(20grains of S/100 cu.ft of gas) x (1lb/7000 grains) x (1lbmol S/32 lb S) x (1lbmol SO₂/11lbmol S) x (385.1 cu.ft of gas/11lbmol gas) x 10⁶ = 343 ppm of SO₂.

Compliance with FERC limit for H₂S of 0.25 grains/100 cu.ft will assure compliance with 45CSR10 limit of 50 grains/100 cu.ft.

Pipeline quality natural gas has very low H₂S content and total sulfur includes H₂S. Hence H₂S is not required to be tested at the inlet gas stream.

Since the last modification of this permit, WVDEP has determined that 45CSR10 is not applicable to the engines.

The following R13-2694 language has been changed in the Title V permit to correct errors in R13-2694:

1. In Section 5.1.1 “Summary of Table 5.1.1.a., 5.1.1.b., and 5.1.1.c.” is changed to “Summary of Table 5.1.1.a and 5.1.1.b.”
2. In Section 5.1.2 “Flare, ID #1C, shall be designed and operation in accordance...” is changed to “Flare, ID #1C, shall be designed and operated in accordance...”.
3. In Section 5.2.1 “If the permittee does not want to use operating parameters that provide the highest HAP emissions, then the permittee may monitor the glycol dehydration unit while conducting the wet gas sampling requirements in Section 5.3.1.” is changed to “If the permittee does not want to use operating parameters that provide the highest HAP emissions, then the permittee may monitor the glycol dehydration unit using results of site specific wet gas sampling analysis.”
4. In Section 5.4.9 “..... gas sampling required by 5.3.1 of this permit.” Is changed to “..... gas sampling used to comply with 5.2.1 of this permit.”

40 CFR 64 - Engines and Reboiler do not have any add-on control device; Therefore, in accordance with 40 C.F.R § 64.2(a), CAM is not applicable to the engines.

TEG Dehydration Unit (001-006) has pre-controlled potential emissions that exceed major source thresholds for volatile organic compounds (VOC) and hazardous air pollutants (HAPs), and is equipped with a flare that is used to comply with federally-enforceable emission limits associated with the dehy operation. Therefore, the Dehydration Unit represents two pollutant specific emissions units (PSEUs), one for volatile organic compounds (VOC) and one for hazardous air pollutants (HAPs). Since one control device is common to both PSEUs, one monitoring plan was submitted in accordance with 40 CFR §64.4(f). The submitted plan meets the requirements of the CAM rule for the TEG Dehydration Unit (001-006) flare controlling VOCs and HAPs from the dehydration unit.

Monitoring per the CAM Plan for VOC and HAPs emissions will be as follows:

		Indicator No. 1
I.	Indicator	Presence of Flame (permit condition 5.1.2.e.)
	Monitoring Approach	Use of thermocouple or any other equivalent device to detect the presence of flame (permit condition 5.1.2.e.).
II.	Indicator Range or Designated Condition	No applicable range. Indicator provides data regarding presence or absence of flame.
III.	Performance Criteria	A thermocouple or any other equivalent device will be installed to continuously monitor the presence of a pilot flame (permit condition 5.1.2.e.).
	A. Data Representativeness	
	B. Verification of Operational Status	The flare shall be operated at all times when emissions may be vented to it (permit condition 5.2.2).
	C. QA/QC Practices and Criteria	Calibration and maintenance of the pilot sensing device will be conducted per manufacturer’s specifications (permit condition 5.4.1.).
	D. Monitoring Frequency	Continuously
	Data Collection Procedures	Records of all flame outs or loss of pilot will be documented and maintained (permit condition 5.4.4.).
	Data averaging periods	Averaging periods are not applicable to this device.

Non-Applicability Determinations

After the installation of flare, this facility is not a major source of HAPs.

The following requirements have been determined not to be applicable to the subject facility due to the following:

40 C.F.R 60 Subpart Dc is not applicable to the Reboiler because its maximum design heat input is less than 10 MMBtu/hr and was constructed before June 9, 1989.

There is no applicable requirement for tanks because there is no tank equal to or greater than 75 m³.

45CSR21 (To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds): Sections 27 and 28 of 45CSR21 are not applicable because all petroleum liquid storage tanks at the Heizer station are below 40,000 gallons in capacity. Section 29 of 45CSR21 is not applicable because the Heizer station is not engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both.

45CSR27 (To Prevent and Control the Emissions of Toxic Air Pollutants): Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR § 27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”

40CFR63, Subpart HH (National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities) is not applicable since the facility is not a production facility nor is a major source of hazardous air pollutants as defined in this subpart.

40CFR63, Subpart HHH (National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Storage and Transmission Facilities) is not applicable since the facility is not a major source of hazardous air pollutants as defined in this subpart.

40CFR63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines) is not applicable since the facility is not a major source of hazardous air pollutants as defined in this subpart.

Request for Variances or Alternatives

N/A

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: June 26, 2007
Ending Date: July 26, 2007

All written comments should be addressed to the following individual and office:

U.K.Bachhawat
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

U.K.Bachhawat
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1256 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

There were no comments.

During the comment period it was discovered that the facility is subject to CAM (40CFR64). The permittee submitted a CAM plan. The flare requirements in the draft permit satisfy the CAM requirements. The CAM plan has been incorporated in the fact sheet under "Determinations and Justifications".