

# Fact Sheet



## *For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act*

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on January 23, 2007.

Permit Number: R30-03900075-2007  
Application Received: August 7, 2009  
Plant Identification Number: 03900075  
Permittee: Cranberry Pipeline Corporation  
Facility Name: Horsemill Compressor Station  
Mailing Address: 102 Third Street  
Glasgow, WV 25086

Permit Action Number: *SM01*      Revised: *November 24, 2009*

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Physical Location: Cedar Grove, Kanawha County, West Virginia  
UTM Coordinates: 461.61 km Easting • 4232.07 km Northing • Zone 17  
Directions: From U.S. Route 60 in Cedar Grove, turn onto Kelly's Creek Road.  
Travel approximately 0.25 miles and turn left into Horsemill Hollow.

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### **Facility Description**

Horsemill Compressor Station is a natural gas gathering facility covered by Standard Industrial Classification (SIC) Code 1389. 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) 600 HP natural gas compressor engine, one (1) 800 HP natural gas compressor engine and 5 tanks of various sizes.

This Title V significant modification (SM01) includes changes approved under R13-2808: Installation of a glycol dehydration unit. No changes are proposed to the existing compressor engines or storage tanks.

This station originally operated with a glycol dehydration unit that was included in the original Title V permit. In 2007, when the Title V Renewal Permit was issued the glycol dehydration unit had been removed and was not included in the permit.

### Emissions Summary

As the result of the significant modification (SM01) here are the following PTE changes:

Pollutant	Change in Potential Emissions (+ or -), TPY
Nitrogen Oxides	+0.11
Carbon Monoxide	+0.090
Volatile Organic Compounds	+15.83
PM/PM <sub>10</sub>	+0.0082
SO <sub>2</sub>	+0.00076
Total HAP <sub>s</sub>	+1.60

### Title V Program Applicability Basis

This facility has the potential to emit 202.71 tons per year of Nitrogen Oxides. Due to this facility's potential to emit over 100 tons per year of a 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.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR2	Particulate Air Pollution from Indirect Heat Exchangers
	45CSR13	Construction Permit
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.

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, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (if any)
R13-2808	9/29/09	NA

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

This Title V significant modification (SM01) includes the changes approved under R13-2808, issued on September 29, 2009. R13-2808 was a construction permit for the installation of a glycol dehydration unit. Emission Unit IDs -RBV-1 and RSV-1 are added in section 1.1 due to installation.

Descriptions for Emission Unit IDs -007 and 008 have been changed per company's request.

As a result of the inclusion of R13-2808 requirements, conditions 4.1.1, 4.2.1 and sections 5.0 and 6.0 have been added to the Title V Permit.

The Title V permit boilerplate has been revised such that a new Section 1.2 Table has been added which lists all the active R13, R14, and/or R19 permits and their date(s) of issuance. Also, the underlying authority for any conditions from the R13, R14, and/or R19 permits has been changed to cite the original permit number in the Title V permit. These changes will eliminate the need to go through the entire Title V permit to change the R13, R14, and/or R19 permit numbers each time an R13, R14, and/or R19 permit is modified. The only required change will be to the Section 1.2 Table.

Condition 5.1.4 has been added to Title V Permit because Reboiler is subject to 45CSR§2-3.1. It is exempt from all but opacity because it has a design heat input <10mmBtu/hr.

This facility is not subject to 40CFR63, Subpart HH, as it is described in Non-Applicability Determinations section. But to show that this facility qualifies for the less than 1.0 tons/yr actual average emissions of Benzene per glycol dehydration unit and exempt from 40CFR63, Subpart HH, section 6 has been added to Title V Permit.

Cranberry's Horsemill Compressor Station is not a transmission facility and is not a major source of HAP's, therefore not subject to 40CFR63, Subpart HHH. But to show that this facility qualifies for the less than 1.0 tons/yr actual average emissions of Benzene per glycol dehydration unit and exempt from 40CFR63, Subpart HHH, section 6 has been added to Title V Permit.

### Non-Applicability Determinations

40CFR Part 82, Subpart F Ozone depleting substance. The purpose of this subpart is to reduce emissions of class I and class II refrigerants and their substitutes. The proposed glycol dehydration unit does not utilize class I and class II refrigerants and their substitutes.

40CFR Part 60, Subpart KKK Natural Gas Plant NSPS is not applicable because this station does not extract liquids from natural gas.

40CFR60, Subpart LLL- This facility does not employ a sweetening or sulfur recovery unit.

40CFR Part 60, Subpart Dc Small Generating Units NSPS is not applicable because the reboiler's heat input is less than 10 million Btu/hr.

40CFR63, Subpart DDDDD Boilers & Process Heaters located at Major Source of HAPs is not applicable because this facility is not a major source of HAPs.

40CFR Part 60, Subpart K, Ka, Kb Storage Vessel NSPS; There is no applicable requirement for tanks because there is no tank equal to or greater than 19,812.9 (75m<sup>3</sup>) gallons.

45CSR40 Control of Ozone Season Nitrogen Oxides Emissions is not applicable to the reboiler because this rule relates to large NO<sub>x</sub> SIP call engines that emitting more than one ton of NO<sub>x</sub> per average ozone season day in 1995.

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 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.

45CSR2- Particulate matter from indirect fired heat exchangers. According to 45 CSR§2-11, the reboiler is exempt from sections 4, 5, 6, 8 and 9 of the rule, which includes MRR (Monitoring, recordkeeping and reporting) requirements, because the reboiler's heat input is less than ten (10) million B.T.U's per hour.

45CSR 10- SO<sub>2</sub> from indirect fired heat exchangers.

Reboiler-It is a fuel burning unit with a maximum design heat input under 10mm Btu/hr., therefore exempt from 45CSR10 per 45CSR§10-10.1

Glycol dehydration unit- There is no SO<sub>2</sub> emissions according to R13-2808 and also it does not extract any sulfur from natural gas stream so it is not subject to 45CSR10.

45CSR14 PSD- This facility's potential emissions are below 250 tons per year. Therefore, this rule does not apply.

45CSR15- Emission standards for hazardous air pollutants pursuant to 40CFR Part 61. This facility is subject to the asbestos inspection and notification requirements. However, no asbestos is affected by the proposed changes.

45CSR19- This facility is located in an attainment area for pollutants of concern. As of June 5, 2009 Kanawha county is in nonattainment for PM-2.5 per the USEPA Website.

40 CFR 64 – The proposed glycol dehydration unit does not have any add-on air pollution control devices; Therefore, in accordance with 40 C.F.R § 64.2(a), CAM is not applicable to the glycol dehydration unit.

45CSR21 (*To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds*) is not applicable because: Sections 27 and 28 of 45CSR21 are not applicable because all petroleum liquid storage tanks at the Horsemill station are below 40,000 gallons in capacity. Section 29 of 45CSR21 is not applicable because the Horsemill 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*) is not applicable because: Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45 CSR § 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.”

### **Request for Variances or Alternatives**

None

### **Insignificant Activities**

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

### **Comment Period**

Beginning Date: October 9, 2009  
Ending Date: November 9, 2009

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

Beena Modi  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> 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**

Beena Modi  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0476

### **Response to Comments (Statement of Basis)**

EPA Region 3 has requested that all annual compliance certifications be submitted electronically (e-mail), so the permit templates have been updated in conditions 3.5.3 and 3.5.5.