

Fact Sheet



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

Permit Number: R30-03900044-2007
Application Received: October 30, 2002
Plant Identification Number: 03900044
Permittee: Cranberry Pipeline Corporation
Facility Name: Staten Run Compressor Station
Mailing Address: 102 Third Street,
Glasgow, WV 25086

Physical Location: Montgomery, Kanawha County, West Virginia
UTM Coordinates: 471.75 km Easting • 4226.49 km Northing • Zone 17
Directions: Travel approximately 1.25 miles west of Smithers on U.S. Route 60 and the facility will be located on the right hand side of the road.

Facility Description

Staten Run Compressor Station is a natural gas production facility covered by Standard Industrial Classification (SIC) Code 1311. 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, one (1) dehydrator reboiler, two (2) 400 HP natural gas compressor engines, one (1) 375 HP natural gas compressor engine, one (1) 330 HP natural gas compressor engine and two (2) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Criteria Pollutants	Potential Emissions	2005 Actual Emissions
Carbon Monoxide (CO)	21.32	16.95
Nitrogen Oxides (NO _x)	86.96	52.18
Particulate Matter (PM ₁₀)	1.61	0.98
Total Particulate Matter (TSP)	1.61	0.98
Sulfur Dioxide (SO ₂)	0.03	0.02
Volatile Organic Compounds (VOC)	92.02	6.42
Total HAPs*	27.48	6.17

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

* HAPs are not speciated because no applicability was triggered.

PM₁₀ is a component of TSP.

Title V Program Applicability Basis

This facility has the potential to emit 27.48 tons per year of HAPs. Due to this facility's potential to emit over 25 tons per year of HAPs, 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 Exchangers
	45CSR6	Open burning prohibited.
	45CSR10	Emission of Sulfur Oxides
	45CSR11	Standby plans for emergency episodes.
	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.
Federal and State:	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
	State Only:	
45CSR4	No objectionable odors.	
45CSR17	Control fugitive particulate matter	

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>)
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

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

Since the last modification of the existing permit, additional MRR (Monitoring, recordkeeping and reporting) has been added regarding the glycol dehydration system.

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

Engines and DEHY burns or combust pipeline quality natural gas only. 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:
 $(20\text{grains of S}/100\text{ cu.ft of gas}) \times (1\text{lb}/7000\text{ grains}) \times (1\text{lbmol S}/32\text{ lb S}) \times (1\text{lbmol SO}_2/1\text{lbmol S}) \times (385.1\text{ cu.ft of gas}/1\text{lbmol gas}) \times 10^6 = 343\text{ ppm of SO}_2$.

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.

Non-Applicability Determinations

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

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

There is no applicable requirement for tanks because there is no tank equal to or greater than 20,000 gallons.

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 Staten Run station are below 40,000 gallons in capacity. Section 29 of 45CSR21 is not applicable because the Staten Run 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. 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 major source of hazardous air pollutants as defined in this subpart. Subpart HH allows a facility that was constructed before June 17, 1999 to use an alternate procedure to determine the potential to emit. If a facility has had an increase in its average production at any time in the previous five- (5) years, then its potential to emit is based on the highest actual production multiplied by a factor of 1.2. In the case of Staten Run, this value was 12.14 MMscf/day (10.12 x 1.2) and the resulting estimate of the potential to emit of HAPs was less the 10 TPY for a single HAP and less that 25 TPY of total HAPs.

40 C.F.R 63 Subpart ZZZZ (Rice MACT) – There are 4 existing engines at this facility. 2 CAT engines are 4SRB (400HP each) < 500HP and 2, 2SLB (1 Cooper and 1Clark) engines. According to the applicability section of 40 C.F.R 63 Subpart ZZZZ these 4 engines are not subject to 40 C.F.R 63 Subpart ZZZZ.

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: December 1, 2006
Ending Date: January 2, 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)

Not applicable.