West Virginia Department of Environmental Protection
Division of Air Quality

Fact Sheet

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

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on April 10, 2012.

Permit Number: **R30-03900075-2012**
Application Received: **December 26, 2012**
Plant Identification Number: **03900075**
Permittee: **Cranberry Pipeline Corporation**
Facility Name: **Horsemill Compressor Station**
Mailing Address: **102 Third Street**
Glasgow, WV 25086

Permit Action Number: *MM01* Revised: *June 3, 2013*

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.

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, a glycol dehydration unit and 4 tanks of various sizes.

A wet gas analysis taken on April 23, 2012 indicated an exceedance of permitted HAP and VOC emissions in Condition 5.1.2 of R13-2808A and the Title V permit. The purpose of this modification is to update permit conditions to reflect the change in emissions indicated by the wet gas analysis.

Emissions Summary

Plantwide Emissions Changes Summary [Tons per Year]	
Regulated Pollutants	**Change in Potential Emissions**
Volatile Organic Compounds (VOC)	+29.85
Hazardous Air Pollutants	**Change in Potential Emissions**
Benzene	+0.14
Ethylbenzene	+2.50
Toluene	+2.43
Xylenes	+3.38
n-Hexane	+0.37
Total HAPs	+8.82

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 TPY of NOx. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Horsemill Compressor Station 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:	45CSR13	NSR Permits
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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)*
R13-2808B	May 10, 2013	

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 modification seeks to increase the emission limits of condition 5.1.2. These limits pertain to the glycol dehydration unit. A wet gas analysis taken on April 23, 2012 indicated an exceedance of permitted HAP and VOC emissions, requiring this modification.

The new emission limits were determined using GRI-GLYCalc V 4.0 wet gas analysis with a 20% buffer for normal variations in output.

The 20% buffer in HAP emission limits was proposed after observing and recording the differences in wet gas analysis from the same emission points between sampling events. Sampling data indicated up to a 20% difference between the current gas analysis and the previous gas analysis. Adding a 20% buffer would allow for natural variation in the natural gas. The 20% buffer would not trigger any Major Source or MACT thresholds (e.g. 10 TPY of any single HAP, 25 TPY of aggregate HAPs, or 1 TPY of Benzene).

The permitted emissions limits have changed as follows:

Pollutant	Hourly Emissions (lb/hr)		Annual Emissions (ton/yr)	
	Before Modification	After Modification	Before Modification	After Modification
VOCs	3.61	10.42	15.82	45.67
Benzene	0.17	0.197	0.72	0.86
Ethylbenzene	0.01	0.572	0.01	2.51
Toluene	0.14	0.696	0.62	3.05
Xylenes	0.05	0.820	0.21	3.59
n-Hexane	0.10	0.181	0.42	0.79

Non-Applicability Determinations

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

There have been no changes to the non-applicability determinations made at the time of the permit renewal.

Greenhouse Gas Tailoring Rule: There have been no changes that would have triggered a PSD permit. As such, there are no applicable GHG permitting requirements.

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: N/A
Ending Date: N/A

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

Rex Compston, P.E.
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

Rex Compston, P.E.
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.