

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 January 10, 2012.

Permit Number: **R30-00500020-2012**
Application Received: **April 2, 2014**
Plant Identification Number: **03-54-00500020**
Permittee: **Cranberry Pipeline Corporation**
Facility Name: **Danville Station**
Mailing Address: **Suite 401, Five Penn Center West
Pittsburgh, Pa 15276-0120**

Permit Action Number: *MM02* Revised: *November 24, 2014*

Physical Location: Danville, Boone County, West Virginia
UTM Coordinates: 422.07 km Easting • 4,214.25 km Northing • Zone 17
Directions: Travel south on US-119 toward Madison. Bear left onto CR-7/03 (Left Fork) for approximately 2.4 miles. Turn left on CR-119/07 (Lick Creek) for approximately 0.9 miles to the station entrance.

Facility Description

Danville 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 with flare, one (1) dehydrator reboiler, three (3) 400 HP natural gas compressor engines, one (1) 800 HP natural gas compressor engine, two (2) 810 HP natural gas compressor engines, one 155 hp emergency generator and two (2) storage tanks of various sizes.

This minor modification incorporates changes from R13-2585D. Oxidation catalysts were added to engines CE-5 and CE-6 to reduce CO emissions, a BTEX condenser was added to eliminate the need to use assist gas for the Flare, F1, and pipeline fluids truck loading, TL-01, was added.

Emissions Summary

The total facility-wide emission changes associated with this minor modification are:

| Pollutant | Before Modification Annual Emissions (tpy) | After Modification Annual Emissions (tpy) | Net Emission Changes (tpy) |
|-----------------|--|---|----------------------------|
| NO _x | 233.58 | 233.67 | 0.09 |
| CO | 50.18 | 32.37 | -17.81 |
| VOCs | 16.14 | 16.65 | 0.51 |
| SO ₂ | 0.08 | 0.23 | 0.15 |
| Formaldehyde | 6.25 | 6.32 | 0.07 |
| Total HAPs | 9.15 | 9.33 | 0.18 |

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 233.67 tons per year of Nitrogen Oxide. 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.

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

| | |
|----------------------------|---|
| Federal and State: 45CSR13 | Construction Permit |
| 45CSR30 | Operating permit requirement |
| 45CSR16 | Performance Standards for New Stationary Sources |
| 45CSR34 | Emissions Standards for HAPs |
| 40 CFR 60, Subpart JJJJ | Performance Standards for Stationary Spark Ignition Internal Combustion Engines |
| 40 CFR 63, Subpart ZZZZ | National Emission Standards for HAPs for Stationary Reciprocating Internal Combustion Engines |
| State Only: N/A | |

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) |
|--------------------------------|------------------|---|
| R13-2585D | 07/02/2014 | 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

In this minor modification, the following changes are made to the existing permit:

1. Modified the Emission Units Table by adding Oxidation Catalysts to CE-5 and CE-6, condenser to F1, 3-way Catalytic Converter to EG-1, and pipeline fluids truck loading TL-01.
2. In section 1.2, changed the NSR permit information due to issuance of R13-2585D which replaced R13-2585C.
3. Added section 3.1.11 to limit HAP emissions and allow the source to be a synthetic minor HAP source, and added 3.4.6 for recordkeeping to demonstrate compliance with the HAP limit, both in accordance with the NSR permit.
4. Added section 3.1.12 to incorporate NSR permit requirements for above ground piping, valves, pumps, etc.
5. Section 4.0 - Updated requirements to match the NSR permit Section 5.0 requirements for CE-5 and CE-6. Changed citations to match NSR permit.
6. Section 5.0 - Updated requirements to match the NSR permit Section 7.0 requirements. Changed citations to match NSR permit. Renumbered conditions as necessary. Moved old condition 5.1.2. to the Testing Requirements section, to correspond with the NSR permit. Deleted old conditions 5.1.5, 5.1.6, and 5.2.3 because the reboiler is a fuel burning unit, and is subject to 45CSR10, Section 3. However, 45CSR§10-10.1 exempts fuel burning units with design heat inputs less than 10 mmBtu/hr from Section 3 requirements.
7. Section 6.0 - Updated requirements to match changes in NSR permit. NSR permit requires the flare to comply with 40 CFR §§60.18(c)(3)(ii) and (c)(4) and to be nonassisted, therefore conditions 6.1.3 through 6.1.5. and all references to steam-assisted flares were deleted. Also deleted 6.2.6 which required monitoring of assist gas flow rate. Streamlining in condition 6.1.14 (was condition 6.1.20 in previous version) was removed because the PM limit from the NSR permit was removed. Included R13-2585, condition 6.4.6., which requires recordkeeping to comply with the synthetic minor HAP status in Section 3.4.6 in the Title V permit. Changed citations to match the NSR permit. Renumbered conditions as necessary.
8. Section 7.0 - Added Truck Loading TL-01 to the heading. Updated requirements to match the NSR permit Section 8.0 requirements. Changed citations to match NSR permit.
9. Section 8.0 - Updated requirements for EG-1 to match the NSR permit requirements from Section 5.0. Changed citations to match NSR permit.
10. Section 9.0 - Updated requirements to match the NSR permit requirements. Conditions 9.1.2, 9.1.3, and 9.1.5 of the R13 permit were not incorporated into the Title V permit because they were deemed not applicable since Engine EG-1 is not temporary, is not at an engine test stand and the facility is subject to 40 CFR Part 70. Changed citations to match NSR permit. Updated 40 CFR Subpart JJJJ requirements to match 1/30/13 revision of the MACT. Condition 9.6.1.b. was deleted because the updated 40 CFR§60.4245(b) is not applicable to a 155.2 HP engine manufactured before 7/1/2011.
11. Section 11.0 – Engines CE-5 and CE-6 have installed oxidation catalysts in accordance with the RICE MACT. The RICE MACT was amended on January 30, 2013, therefore this section was changed to update the MACT requirements accordingly. The changes include:
 - §63.6603(a) no longer references Table 1b.
 - Table 2b no longer has requirements for existing SI engines, therefore Table 2b was deleted from Section 11.1.2.
 - Table 2d now requires 4SLB engines that are not remote to install oxidation catalysts to reduce HAP emissions.

- Section 11.1.4.(e) was added.
 - Table 5 was amended.
 - Section 11.1.6.(c) was added. Reference to Table 6, Item 14 was added.
 - Section 11.3.2. was deleted because the engine type is not listed in Table 3.
- Permit R13-2585D, Conditions 10.1.5. and 10.1.13.h. were not incorporated into the Title V permit because they were deemed not applicable to Engines CE-5 and CE-6.

Non-Applicability Determinations

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

N/A

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: Not Applicable

Ending Date: N/A

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

Bobbie Scroggie
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478

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.

Response to Comments (Statement of Basis)

Not applicable.