

Fact Sheet



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

Permit Number: **R30-09900012-2012**
Application Received: **September 19, 2011**
Plant Identification Number: **03-54-09900012**
Permittee: **Cranberry Pipeline Corporation**
Facility Name: **Beech Fork Compressor Station**
Mailing Address: **Route 152, Wayne, WV 25570**

Physical Location: Wayne, Wayne County, West Virginia
UTM Coordinates: 375.35 km Easting • 4239.79 km Northing • Zone 17
Directions: Take Exit 8 from I-64 to 152 South towards Lavalette. From Lavalette go approximately 2 miles on 152 south and turn left onto Falls Branch Road. Travel approximately 1.5 miles to the station on the right.

Facility Description

Beech Fork Compressor Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 1311 and by North American Industry Classification System 211111. The station has the potential to operate twenty-four (24) hours per day, seven (7) days per week, and fifty-two (52) weeks per year. The station consists of three (3) 576 HP natural gas compressor engines and four (4) storage tanks of various sizes.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2010 Actual Emissions
Carbon Monoxide (CO)	20.01	14.51
Nitrogen Oxides (NO _x)	216.72	157.22
Particulate Matter (PM ₁₀)	2.66	1.93
Total Particulate Matter (TSP)	2.66	1.93
Sulfur Dioxide (SO ₂)	0.03	0.02
Volatile Organic Compounds (VOC) ¹	7.24	5.43
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2010 Actual Emissions
Total HAPs ²	5.24	4.61
<i>Some of the above HAPs may be counted as PM or VOCs.</i>		

¹ The consultant did not know the reasons for the reduction in VOC emissions from the first renewal to the second renewal since the engineering personnel for the first renewal are no longer available to answer questions.

² HAPs were not speciated since the regulatory triggers were not exceeded. The triggers are 10 TPY for a single HAP or 25 TPY of Total HAPs. The highest HAP PTE is formaldehyde at 5.01 TPY.

Title V Program Applicability Basis

This facility has the potential to emit 216.72 tons per year of Nitrogen Oxides. 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:	45CSR6	Open burning prohibited.
	45CSR11	Standby plans for emergency episodes.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances

State Only:	45CSR4 45CSR17	No objectionable odors. To Prevent and Control fugitive particulate matter Air Pollution from Materials Handling, Preparation, Storage and other Sources of Fugitive Particulate Matter
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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 (<i>if any</i>)
None		

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 R30-09900012-2007 was issued, there have been no changes to the Cranberry Pipeline Corporation Beech Fork Compressor Station Title V Permit.

The following updates were made to the renewal permit:

1. The Emission Unit Table 1.1 was not revised since the facility did not add or delete any equipment between the 2007 renewal and the 2011 renewal.
2. Added Section 1.2, the Active R13, R14, and R19 Permits Table.
3. The regulatory language for Sections 3.1.1 and 3.1.2, 45CSR§§6-3.1 and 3.2, was updated.
4. 45CSR34 incorporates and is now cited with 40 C.F.R. Part 61 because 45CSR15 was repealed. The citation for 3.1.3 has been revised accordingly.
5. The boilerplate language for Section 3.3.1 was revised with the addition of Section 3.3.1.d and the citation was also revised to expand the authority of the West Virginia state code.
6. Replaced "N/A" in Section 3.7.2 of the second renewal Title V permit with a table of non-applicable requirements.
7. 40 C.F.R. Part 63 Subpart ZZZZ area source requirements were incorporated as Section 4.0.

Cranberry Pipeline Corporation has not modified the Beech Fork Compressor Station that would trigger a PSD permit and require GHG permitting.

40 C.F.R. Part 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The Cranberry Pipeline Corporation Beech Fork Compressor Station has three (3) 576 HP reciprocating engines, each with integral compressors that are subject to the area source provisions of 40 C.F.R. Part 63 Subpart ZZZZ. The reciprocating engines with integral compressors were constructed prior to June 12, 2006. The facility shall comply with all applicable requirements of 40 C.F.R. Part 63 Subpart ZZZZ by October 19, 2013 per 40 C.F.R. § 63.6595 (see Section 4.1.1.).

Although non-major area source MACT provisions under 40 C.F.R. Part 63 Subpart ZZZZ are excluded from state delegation in 45CSR34, these requirements are applicable requirements under 45CSR§30-2.6.d, which includes any requirement subject to §112 of the CAA.

The three (3) 576 HP engines (001-02, 001-03, 001-06) are existing spark-ignition (SI) two-stroke lean burn (2SLB) Ajax DPC-600 Reciprocating Engine/Integral Compressors that combust pipeline quality natural gas. As stated below, the engines meet the definition for stationary reciprocating internal combustion engines (RICE) according to 40 C.F.R. § 63.6585 (a):

“A stationary RICE is any internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differs from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 C.F.R. 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.”

The Beech Fork Compressor Station’s engines are in the category of existing stationary engines greater than 500 HP located at an area source of HAPs as established by the RICE regulation.

Engines (001-02, 001-03, 001-06) are subject to the maintenance requirements for a non-emergency, non-black start 2SLB stationary RICE (every 4,320 hours of operation or annually change oil/filter, inspect spark plugs, and inspect hoses/belts), Table 2d, Item 6.

Following, are the applicable RICE MACT requirements according to the “Summary of Requirements” table provided by EPA.

Emission Unit ID	Emission Limitations	Operating Limitations	Performance Testing	Monitoring Requirements	Initial Compliance	Continuous Compliance	Notification Requirements	Record-keeping Requirements	Reporting Requirements
001-02	§ 63.6603	None	None	§ 63.6625 (e), (h), (j)	None	§ 63.6605	None	§ 63.6655	None
001-03	Table 2d				§ 63.6640	(a), (b),			
001-06	See item 6				(d), (e)				

Non-Applicability Determinations

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

45CSR21	To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds. This facility is not subject to 45CSR §§21-27 and 28 since all the petroleum liquid storage tanks at the Beech Fork station are below 40,000 gallons in capacity. 45CSR§21-29 does not apply because the Beech Fork 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 does not apply since natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment that is “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.”
40 C.F.R. Part 60 Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The three (3) 576 HP reciprocating engines with integral compressors were manufactured before July 11, 2005 and they are not fired by diesel fuel. Thus, these engines are not subject to 40 C.F.R. Part 60 Subpart IIII.
40 C.F.R. Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The three (3) 576 HP reciprocating engines with integral compressors were constructed before June 12, 2006 and they are fired by natural gas. Thus, these engines are not subject to 40 C.F.R. Part 60 Subpart JJJJ.
40 C.F.R. Part 63 Subpart HH	National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. The Beech Fork Compressor Station is upstream of the CGT’s Kenova Compressor Station and the Markwest Extraction facility, but it is not subject to Subpart HH since the station does not contain an affected source (triethylene glycol (TEG) dehydration unit) as identified in 40 C.F.R. §§ 63.760 (d) and (b) (2).
40 C.F.R. Part 63 Subpart HHH	National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. The Beech Fork Compressor Station is not subject to Subpart HHH since the station does not have a glycol dehydration facility as well as the station is not a major source of HAPs.
40 C.F.R. Part 64	This is the second permit renewal for this facility. During the first renewal, it was determined that CAM is not applicable to these engines since they do not have any add-on control, in accordance with 40 C.F.R § 64.2 (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: November 23, 2011
 Ending Date: December 23, 2011

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

Wayne Green
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

Wayne Green
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1258 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.