

Fact Sheet



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

Permit Number: **R30-00500020-2022**
Application Received: **November 3, 2021**
Plant Identification Number: **03-54-00500020**
Permittee: **Cranberry Pipeline Corporation**
Facility Name: **Danville Station**
Mailing Address: **125 Industrial Rd, Waynesburg, PA 15370**

Physical Location:	Danville, Boone County, West Virginia
UTM Coordinates:	422.070 km Easting • 4,214.250 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

The Danville Station is a natural gas gathering and boosting 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 three (3) 400 hp, 2SLB, reciprocating engines, two (2) 810 hp, 4SLB, reciprocating engines equipped with catalysts, one (1) 800 hp, 2SLB, reciprocating engine, one (1) 155 hp, 4SRB emergency generator, one (1) 0.75 mmBtu/hr reboiler vent, one (1) 25 mmscf/d dehydration unit controlled by both a BTEX condenser and a Flare, two (2) 4,200 gallon produced fluids tanks, and various other de minimus tanks.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2021 Actual Emissions ¹
Carbon Monoxide (CO)	31.86	26.40 ²
Nitrogen Oxides (NO _x)	233.77	190.86
Particulate Matter (PM _{2.5})	4.07	1.94
Particulate Matter (PM ₁₀)	4.07	1.94
Total Particulate Matter (TSP)	4.07	1.94
Sulfur Dioxide (SO ₂)	0.24	0.06
Volatile Organic Compounds (VOC)	15.09	13.90 ²
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2021 Actual Emissions ¹
Benzene	0.19	0.13
Ethylbenzene	0.07	0.01
Toluene	0.12	0.08
Xylene	0.11	0.03
Hexane	0.12	0.14
Formaldehyde	6.25	5.48
Other HAP	2.37	1.89
Total HAP	9.06	7.76

¹ Actual emissions are from the State and Local Emissions Inventory System (SLEIS).

² The company reported 45.84 tpy of CO and 16.33 tpy for VOCs in SLEIS for 2021. After contacting the consultant, it was discovered that the CO numbers did not account for the control device efficiency for CE-5 and CE-6 and that the VOCs included fugitive emission. Therefore, the writer changed these values to the more accurate values 26.40 tpy for CO and 13.90 tpy for VOCs.

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

Title V Program Applicability Basis

This facility has 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 Company 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.
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Construction Permit
	45CSR16	New stationary sources.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for Hazardous Air Pollutants for Source Categories Pursuant to 40 CFR, Part 63
	40 C.F.R. Part 60, Subpart JJJJ	Stationary spark ignition IC engines.
	40 C.F.R § 60.18	NSPS Flare requirements
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63, Subpart ZZZZ	RICE MACT
	40 C.F.R. Part 63, Subpart HH	Oil and Natural Gas Production Facilities MACT
	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 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 (<i>if any</i>)
R13-2585G	August 22, 2022	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," which may be downloaded from DAQ's website.

Determinations and Justifications

This renewal application includes changes submitted as minor modification R30-00500020-2017 (MM01). The minor modification addresses changes approved under permit R13-2585F, which was issued August 5, 2021 and approved the replacement of existing engine CE-5 with an engine from the same manufacturer, same model number, same horsepower rating and same control device. The existing engine was a 2004 Caterpillar G3512 TALE 810 hp 4SLB with oxidation catalysts (serial number 7NJ01049) subject to 40 CFR 63 Subpart ZZZZ. The replacement engine was a 1994 Caterpillar G3512 TALE 810 hp 4SLB with oxidation

catalysts (serial number 7NJ00072) subject to 40 CFR 63 Subpart ZZZZ. There was no change in the facility's potential to emit.

Preconstruction Permit R13-2585G

Permit R13-2585G was approved on August 22, 2022 and permitted these changes:

The following equipment will be installed at the facility:

- One (1) 1,750 hp Electric Reciprocating Motor Compressor (ECE-1)

The following equipment will be removed from the facility:

- Three (3) 400 hp 2SLB Cooper Reciprocating Engines (#1, #2 and #3 all installed in 1957)
- One (1) 800 hp 2SLB Cooper Reciprocating Engine (#4 installed in 1980)

Permit R13-2585G approved the installation of Electric Reciprocating Motor Compressor (ECE-1), which will not have any emissions associated with it. The removal of grandfathered reciprocating engines #1, #2, #3 and #4 will result in a combined decrease of 201.88 TPY of NO_x, which will reduce the facility's PTE to 31.89 TPY. Therefore, the facility will no longer have the potential to emit one hundred (100) tpy or more of any criteria pollutant, ten (10) tons per year (tpy) or more of any hazardous air pollutant which has been listed pursuant to §112(b) of the Clean Air Act, or twenty-five (25) tpy or more of any combination of such hazardous air pollutants. The facility has indicated that it intends to file the appropriate paperwork to become a minor source at that time. The permittee must submit a letter to the WV DAQ requesting to declare their Title V permit inactive and must also submit a revised Certified Emission Statement (CES) registration form which reports the facility's new potential emissions.

Due to all of the information explained above, the renewal permit will only include the existing equipment at the facility and not the proposed Electric Reciprocating Motor Compressor (ECE-1), which was not addressed in the renewal application. None of the existing equipment has been modified or changed in any way since the last renewal.

This is a renewal of Title V Operating Permit R30-00500020-2017, which was issued on May 3, 2017. Substantial changes consist of the following:

- 1) **Formatting** – Various formatting issues were cleaned up throughout the permit such as tab spacing, alignment, extra spaces, missing periods behind section numbering, etc.
- 2) **Facility Information** – The facility's mailing address was updated.
- 3) **Condition 1.1.** – In the Emissions Units table, the descriptions, installation years and design capacities for TKO-1 and TKO-2 were changed to reflect the info listed in permit R13-2585G.

The year installed for emission unit ID CE-5 was updated from 2004 to 1994 as a result of the replacement approved in permit R13-2585F.

The description for emission unit ID EG-1 was changed from 4SLB to 4SRB to correct a typo and added the description for 4SRB in the Note under the table. This change did not affect EG-1's applicable requirements.

Added compressor blowdown engine venting (CE-BD) because it was added in permit R13-2585G.

- 4) **Condition 1.2** – The active R13 Permit was updated to R13-2585G issued on August 22, 2022.

5) Title V Boilerplate changes

- **Condition 2.11.4.** – The reference notation was changed from 45CSR§30-2.39 to 45CSR§30-2.40 because this definition was renumbered in 45CSR30.
- **Condition 2.22.1.** - The reference notation was changed to delete 45CSR38 because it has been repealed.
- **Condition 3.5.3.** - The EPA contact information and address were updated.

6) Section 3.0

- **Condition 3.1.12.** - Revised this condition to match permit R13-2585G.
- **Condition 3.1.13.** – This condition was added because it was added to permit R13-2585G.

7) Section 4.0 – The title block language was revised to match the boiler plate.

- **Condition 4.1.1.** – The language was revised to match permit R13-2585G and the citation was updated.
- **Condition 4.1.2.** - The reference notation was updated to match permit R13-2585G.
- **New Condition 4.1.3.** – This new condition was added to include the new permit requirement added to permit R13-2585G and the existing following conditions were renumbered accordingly.
- **Condition 4.1.4.** - The reference notation was updated to match permit R13-2585G.
- **Condition 4.2.1.** – This condition was revised to match permit R13-2585G.
- **Condition 4.4.1.** – This condition was deleted because it was removed from permit R13-2585G.
- **Condition 4.4.2** - The reference notation was updated to match permit R13-2585G.

8) Section 5.0 – The title block language was revised to match the boiler plate.

- **Condition 5.1.2.** – The language was revised to match permit R13-2585G and the table was added.
- **Condition 5.2.1.** - The reference to Secretary was changed to Director to match permit R13-2585G.

9) Section 6.0 – The title block language was revised to match the boiler plate.

- **Condition 6.1.13.** – The reference to million standard cubic feet per day was deleted to match permit R13-2585G.
- **Condition 6.1.14.** – The maximum permitted emissions for CO and VOC for Flare F1 were updated to match permit R13-2585G.
- **Condition 6.3.2.** – The language was revised to match permit R13-2585G and the table was added.

10) Section 7.0 – The title block language was revised to match the boiler plate.

- **Condition 7.1.1.** – The reserved place holder was replaced with a new condition that was added because it was added to permit R13-2585G.

- **Condition 7.1.2.** – The language was revised to match permit R13-2585G.
- **Condition 7.1.3.** – This condition was deleted to reflect the changes from permit R13-2585G.
- **Conditions 7.1.4.** - This condition was deleted to reflect the changes from permit R13-2585G.
- **Condition 7.2.1.** – The language was revised to match permit R13-2585G.
- **Condition 7.4.1.** – This Condition replaced a reserved place holder and was added to match permit R13-2585G.
- **Conditions 7.4.3. and 7.4.4** – These conditions were deleted to reflect the changes from permit R13-2585G
- **Condition 7.5.1.** – This condition was deleted to reflect the changes from permit R13-2585G.

11) Section 8.0 – The title block language was revised to match the boiler plate.

- **New Condition 8.1.2.** – This new condition was added to include the new permit requirement added to permit R13-2585G.
- **New Condition 8.1.3.** – This new condition was added to include the new permit requirement added to permit R13-2585G.
- **Conditions 8.1.4. and 8.1.5.** – These conditions were renumbered because of the addition and insertion of new conditions 8.1.2 and 8.1.3.
- **Condition 8.2.1** – This condition was revised to match permit R13-2585G
- **Conditions 8.4.1.** - This condition was deleted because it was removed from permit R13-2585G.
- **Old Condition 8.4.2.** – This condition was renumbered as 8.4.1. and the reference notation was updated to match permit R13-2585G.
- **New Condition 8.4.2.** – This new condition was added to include the new permit requirement added to permit R13-2585G.

12) Section 9.0 – The title block language was revised to match the boiler plate.

- **Condition 9.4.3.** – The references to and regulatory language for 40 C.F.R. §§60.4243(d)(2)(ii) and (iii) were deleted because they have been vacated.
- **Condition 9.6.1.** – This condition was split into conditions 9.6.1 and 9.6.2 to be more organized and consistent with existing formatting.
- **New Condition 9.6.3.** – This new condition was added to include the new permit requirement added to permit R13-2585G.

13) New Section 12.0 – This section regarding Source-Specific Requirements (Blowdown Venting) was added because it was added to permit R13-2585G.

Non-Applicability Determinations

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

40 CFR 64 (CAM Rule) – 40 C.F.R. 64 – Compliance Assurance Monitoring – The facility does not have any pollutant specific emission units (PSEU) that satisfy all the applicability criteria requirements of 40 C.F.R. §64.2(a). There have been no changes to any equipment at the facility since the previous renewal was issued, so CAM remains non-applicable to the emission units listed in the renewal application.

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: September 14, 2022

Ending Date: October 14, 2022

Point of Contact

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

Dan Roberts
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/926-0499 ext. 41902
Daniel.p.roberts@wv.gov

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)

On October 11, 2022, Gwen Supplee of the EPA sent an email which stated the WV Draft/Proposed Title V Renewal for Cranberry Pipeline Corporation - Danville Station has been reviewed and they do not have any comments.

No other responses or comments were received.