

LAUREL MOUNTAIN MIDSTREAM, LLC
Springhill Compressor Station
General Permit BAQ-GPA/GP-5 Permit Application

Startup, Shutdown and Maintenance (SSM) Emissions

SSM PTE Calculations

Unit	No of Compressors	Total Engine bhp	SSM Events/yr	Starting Gas scf/SSM	Blowdown Gas scf/SSM	Total Gas Vented MMscf/yr	CH4 Emissions lb/hr	VOC Emissions 1,000 lb/MMscf tpy	HAP Emissions 150 lb/MMscf tpy
Facility Wide SSM	3	4,180	365	1,400	25,980	9.99	1,155	5.00	0.75

Notes: 1 - SSM Emissions are the sum of unburned fuel resulting from "cold-start" of idle gas-fired engines plus the gas that is purged (blowdown) from the compressor and associated piping and equipment.

2 - Starting Gas Qty and Blowdown Gas Qty as per Engineering Department.
(e.g., 8577 scf/B-D of a compressor with a 1380 bhp engine equals 6.215 scf/bhp/B-D.)

Starting Gas is Constant at:	700.00 scf/start
Blowdown Gas is Related to bhp at:	6.215 scf/hp/B-D

3 - To be conservative, the following gas characteristics were assumed:

	Analysis	Estimated
CH4	40,894.8 lb/MMscf	42,200 lb/MMscf
VOC	480.3 lb/MMscf	1,000 lb/MMscf
HAP	10.3 lb/MMscf	150 lb/MMscf

4 - Conservatively assumed: 7 Blowdowns/compressor/week.

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Dehydrator Emissions

Glycol Dehydrator PTE Calculations

Unit	Description	Capacity	Emission Factor Source	Pollutant	Emission Factor lb/MMscf	Emission Factor lb/MMBtu	Uncontrolled Emissions lb/hr	tpy	Control Efficiency %
Dehydrator 1	Regenerator Vent	Dry Gas Flow Rate 25 MMscfd	GRI-GLYCalc	VOC	na	na	2.12	9.30	0.0%
			GRI-GLYCalc	HAP	na	na	0.27	1.18	0.0%
			GRI-GLYCalc	CH4	na	na	91.32	400.00	0.0%
	Reboiler	Heat Input 0.25 MMBtu/hr	EPA AP-42 Table 1.4-1	NOX	100.00	0.0980	0.02	0.11	0.0%
			EPA AP-42 Table 1.4-1	CO	84.00	0.0824	0.02	0.09	0.0%
			EPA AP-42 Table 1.4-2	VOC	5.50	0.0054	0.00	0.01	0.0%
			EPA AP-42 Table 1.4-2	HAP	1.88	0.0018	0.00	0.00	0.0%

Notes: 1 - Used GRI-GLYCalc V4.0 to calculate Regenerator Vent Emissions.

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Fugitive Emissions

Fugitive PTE Calculations (Gas/Vapor)

Unit	Description	Component (Unit) Type	Unit Count	THC Em. Factor lb/Unit/hr	THC Emissions lb/hr	CH4 Emissions 100.00% THC Wgt lb/hr tpy	VOC Emissions 2.00% THC Wgt lb/hr tpy	HAP Emissions 0.50% THC Wgt lb/hr tpy
Process Fugitives	Process Piping Fugitives	Connectors	1,474	0.0004	0.65	2.85	0.01	0.00
		Flanges	240	0.0009	0.21	0.90	0.00	0.00
		Open-ended lines	28	0.0044	0.12	0.54	0.00	0.00
		Pump Seals	0	0.0053	0.00	0.00	0.00	0.00
		Valves	514	0.0099	5.10	22.34	0.10	0.03
		Other	60	0.0194	1.16	5.10	0.02	0.01
TOTALS:						7.24	31.72	0.14
							0.63	0.04
								0.16

- Notes:
- 1 - Assumed 8,760 hours per year of fugitive emissions.
 - 2 - Gas/Vapor emissions calculated using EPA factors for Oil and Gas Production Operations.
(Protocol for Equipment Leak Emission Estimates, 1995, EPA-453/R-95-017).
 - 3 - Component counts are based on the default counts for compressor stations (GRI-HAPCalc model) multiplied by 2.
 - 4 - "Other" components include compressor seals, relief valves, diaphragms, drains, meters etc.
 - 5 - THC = Total Hydrocarbons, including Methane (CH4) and Ethane (C2H6).
 - 6 - VOC = Non-Methane/Non-Ethane THC. (Sometimes designated C3+)
 - 7 - HAP = Hazardous Air Pollutants as designated by EPA, in this case n-Hexane and BTEX.
 - 8 - To be conservative, the following gas characteristics were assumed:

	Gas Analysis	
	Gas Analysis	Estimated
CH4	94.77 % of THC	100.00 % of THC
VOC	1.11 % of THC	2.00 % of THC
HAP	0.02 % of THC	0.50 % of THC

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Truck Loading Emissions

Truck Loading PTE Calculations

Description	S sat. fac.	P psia	M lb/lb-mol	T °R	CE %	L _L lb/kgal	T-Put kgal/yr	VOC Emission Rate (AP-42) tpy	HAP Emission Rate 2.39% of VOC tpy
Condensate/Produced Water Load-Out	0.6	4.9	166	520	0.0%	11.69	249.20	1.46	0.03
AMOUNT OF VOC IN PRODUCED WATER:									
TRUCK LOADING VOC EMISSIONS:									
								20%	20%
								0.29	0.01

Notes: 1 - Emission factors and formulas are from AP-42 Section 5.2 Transportation and Marketing of Petroleum Liquids:

$$L_L = 12.46 \times S \times P \times M / T \times (1 - CE)$$

where:

L_L = loading loss, lb/1000 gal of liquid loaded

S = saturation factor, use 0.6 for submerged loading in dedicated service

P = true vapor pressure of liquid loaded, psia

M = molecular weight of vapors, lb/lb-mol

T = temperature of bulk liquid loaded, °R (°F + 460)

CE = overall emission reduction efficiency (collection efficiency x control efficiency)

2 - Temperature, vapor pressure and molecular weights are E&P TANK V2.0 defaults.

3 - It is estimated that each tank will be emptied up to:

4 - The total storage tank capacity at the facility is:

5 - Assume each truck carries 4,000 gallons, so there are:

6 - Assume it takes less than one hour to load a truck.

7 - The liquid loaded into tanker trucks is predominantly water with small amounts of hydrocarbon liquids; therefore, for calculating VOC emissions, 20% of the liquid is assumed to be VOC.

8 - HAP emissions are based on HAP to VOC proportions determined by E&P TANK V2.0.

14	times per year.
424	bbls.
64	loads/yr.

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Storage Tank Emissions

Storage Tank PTE Calculations (E&P TANK V2.0)

Tank Data									
Tank ID	Capacity bbls	Diameter ft	Height ft	Roof Slope rise/run	Liq Hgt ft	Vent Pres psig	Paint Color	Paint Condition	
1	150	10	15.0	0.06	6	0.06	Green	Good	
2	150	10	15.0	0.06	15	0.06	Green	Good	
3	100	8.5	10.0	0.06	15	0.06	Green	Good	
4	24	5.3	6.0	0.06	15	0.06	Green	Good	

~Cont.

Throughput Summary	
424 bbls total capacity	
17,800 gal total capacity	
14 Turnovers/yr	
5,933 bbl throughput/yr	
249.20 kgal throughput/yr	

Material Data									
Tank ID	Material Stored	bbl/day	Throughput days/yr	bbls/yr	Gravity API	RVP psia	Bulk Temp °F	VOC Emissions lb/hr	HAP Emissions lb/hr
1	Condensate/Produced Water	5.75	365	2,100	46	7.7	60	0.18	0.005
2	Condensate/Produced Water	5.75	365	2,100	46	7.7	60	0.18	0.005
3	Condensate/Produced Water	3.84	365	1,400	46	7.7	60	0.11	0.002
4	Condensate/Produced Water	0.91	366	333	46	7.7	60	0.01	0.000

~Cont.

TOTAL FOR FOUR TANKS:

ADJUSTMENT FOR HIGH WATER CONTENT:

TOTAL STORAGE TANK VOC EMISSIONS:

0.48	2.09	0.01	0.05
20%	20%	20%	20%
0.10	0.42	0.00	0.01
HAP as a % of VOC:			
			2.39%

Notes: 1 - Tanks store condensate and produced water.

2 - Tank emissions were calculated by E&P TANK V2.0.

3 - Used "Tank with Separator" program and E&P TANK V2.0 default data (e.g. API gravity, specific gravity, vapor pressure).

4 - A liquid analysis showing 100% hydrocarbon liquids was used in E&P Tank; however, for calculating VOC emissions, 20% of the liquid is assumed to be VOC.

5 - This is a worst-case assumption as the stored liquids are expected to be mostly water.