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May 6, 2015

Via Federal Express, Overnight Delivery

Mark R. Gorog, P.E.
Environmental Engineer Manager
Air Quality Program
Region V: Southwest Regional Office
Pennsylvania Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222-4745

**Subject: Application for Authorization to Use General Permit GP-5
(Modification at an Existing Facility with a GP-5 Authorization)
Laurel Mountain Midstream Operating, LLC
Springhill Compressor Station
Springhill Township, Fayette County, PA**

Dear Mr. Gorog,

Laurel Mountain Midstream Operating, LLC (LMM) is submitting the attached Application to Use General Permit GP-5 to the Pennsylvania Department of Environmental Protection (DEP) to request authorization for modifications at the existing LMM Springhill Compressor Station (CS); (GP5-26-00587B and GP5-26-00587C). The facility is located approx. 1.5 Miles Northeast of Point Marion, 585 Hope Hollow Road (T325), Lake Lynn, Springhill Township, Fayette County, Pennsylvania.

This Application has been prepared and submitted to provide for the following equipment and operations at the LMM Springhill CS:

- One (1) Existing 1,500 bhp Electric Motor Driven Compressor (CE-01)
- Two (2) **NEW** 1,380 bhp Caterpillar (CAT) G3516B Compressor Engines (CE-04 and -05)
- Existing Compressor Rod Packing and Engine Crankcase Emissions (RPC)
- Existing Startup/Shutdown/Maintenance (Including Blowdown) Emissions (SSM)
- One (1) Existing 25.0 MMscf/day Dehydrator (Regenerator) (DEHY-01)
- One (1) Existing 0.25 MMBtu/hr Reboiler (BLR-01)
- One (1) **NEW** 40.0 MMscf/day Dehydrator (Flash Tank and Regenerator) (DEHY-02)
- One (1) **NEW** 0.75 MMBtu/hr Reboiler (BLR-02)
- Four (4) Existing Produced Water Storage Tanks (424 bbl Total) (TKS)
- Existing Produced Water Truck Load-Out (11,000 bbl/yr Total) (TLO)
- Existing Piping and Equipment Fugitive Emissions (FUG)
- Other Existing and NEW equipment and operations with de minimis emissions (MISC)

The following equipment will be removed from the LMM Springhill CS either during or after installation of the new equipment:

- Remove Two (2) 1,340 bhp CAT G3516LE Compressor Engines (CE-02 and -03)

The LMM Springhill CS continues to qualify as a natural minor (or area) source under non-attainment new Source Review (NNSR), Prevention of Significant Deterioration (PSD), Hazardous Air Pollutant (HAPs) and Title V Operating Permit (TVOP) regulations. See Tables 1 thru 3, below:

Table 1 - Facility-Wide Potential To Emit (PTE) vs. FEL (w/ Fugitives)

Pollutant		PTE (tpy)	FEL ^a (tpy)
Nitrogen Oxides	NOX	13.80	100
Carbon Monoxide	CO	4.93	100
Volatile Organic Compounds	VOC ^b	24.45	50
Formaldehyde	HCHO	0.90	10
Total Hazardous Air Pollutants	Total HAPs ^c	10.80	25

^aPursuant to GP-5 Section A.9(c), Facility-Wide Emission Limitations.

^bVolatile Organic Compounds, including formaldehyde (HCHO).

^cTotal HAPs, including: BTEX (benzene, toluene, ethylbenzene, xylenes), HCHO, n-hexane, 2,2,4-TMP, acetaldehyde, acrolein, CH₃OH (methanol), and traces of other HAPs.

Table 2 - Engines - Federally Enforceable Limitations (FEL)

Description	Pollutant	FEL ^a
NEW - 1,380 bhp CAT G3516B Compressor Engines (CE-04 and CE-05) (each)	NOX	0.50 g/bhp-hr
	CO	47 ppmvd @ 15% O ₂ or 93% reduction
	NMNEHC ^b	0.25 g/bhp-hr
	HCHO	0.05 g/bhp-hr

^aPursuant to GP-5 Section B.2(a), Emission Standards for New Stationary Engines.

^bNon-Methane Non-Ethane Hydrocarbon (NMNEHC), does NOT include HCHO.

Table 3 - Dehydrators - Federally Enforceable Limitations (FEL)

Description	Pollutant	FEL (tpy)
Existing - 25.0 MMscfd Dehydrator (DEHY-01)	VOC	10.0 ^a
	Benzene	1.0 ^b
NEW - 40.0 MMscfd Dehydrator (DEHY-02)	VOC	5.0 ^c
	Benzene	1.0 ^b

^aPursuant to GP-5 Section F.2, Existing Dehydrators w/o Controls.

^bPursuant to 40 CFR Part 63 Subpart HH, Exemption.

^cPursuant to GP-5 Section F.3, New Dehydrators w/o Controls.

Mark R. Gorog, P.E.
Southwest Regional Office - PADEP
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Further discussion regarding the specific equipment, control technology, applicability of federal and state regulations, a process flow diagram, and a topographic/location map, are provided in the Application Supplement. The Single Source Determination is in Attachment A. The General Information Form (GIF), General Permit GP-5 Application Forms, and the Compliance Review Form (CRF), are in Attachment B; Emission Calculations are in Attachment C; and various Supporting Documents, including Proof of Municipal Notification, and Permit Application Fee, are in Attachment D.

Note: Compressor Rod-Packing/Engine Crankcase (RPC), Startup/Shutdown/Maintenance (and Blowdown) (SSM), and Truck Load-Out (TLO) emissions are provided in Attachment C and the results are included on the GP 5 Application Emission Summary Forms H10 and H11.

If you have any questions concerning this submittal, or need additional information, please contact me at 412-787-4197 or Joe.McCay@Williams.com.

Sincerely,

Joseph R. McCay
Environmental Specialist

Enclosures:

APPLICATION FOR AUTHORIZATION TO USE GENERAL PLAN APPROVAL AND/OR
GENERAL OPERATING PERMIT (GP-5)
Application Supplement
Attachment A – Single Source Determination
Attachment B – Auxiliary Application Forms
Attachment C – Emission Calculations
Attachment D – Supporting Documents