

Sandy, Alexander

From: McCay, Joe <Joe.McCay@Williams.com>
Sent: Friday, October 04, 2013 3:01 PM
To: Sandy, Alexander
Cc: Baker, Dick; Sumpter, Lindsay; Fernald, Don; Walter Konkel
Subject: RE: Springhill, Beagle, Herminie
Attachments: Application Performance Warranty Data Proposal_DZ-11-2950Rev(5).pdf

Alex,

See responses below

As a follow up, my review of Springhill isn't as comprehensive at this point but I did note the following:

1. It's my understanding the relocated engines will be subject to the requirements of Section 2 Condition 2(a):
 - a. Engine PTE should be calculated at the applicable emission standard of Condition 2(a) not the vender guarantee since it is the enforceable rate. For example HCHO was calculated at 0.03 g/bhp-hr rather than 0.05 g/bhp-hr. **Response – The proposed engines will meet the engine emission limitations of GP5 Section B. 2 (a) including 0.05 g/bhp-hr. This is verified by the manufacturer's guarantee of 0.03 g/bhp-hr.**

Under the GP5 the facility must also remain a minor source. When the revised GP5 was issued, the PADEP Central Office stated that this requirement must be demonstrated, as required, through the use of a 12 month rolling average of actual emissions (GP5 Section A. 9 (c)). The 12 month rolling average would demonstrate the facility would remain a minor source for whatever equipment that was installed.

The equipment could include back up engines, emergency generators, or equipment with guaranteed or demonstrated emissions lower than the required limitations in the GP5. Central Office went on to say it is up to the operator to manage these sources appropriately to maintain the facility as a minor source.

Therefore, the PTE for demonstrating the facility is a minor source should be done on a more representative basis for proposed equipment than simply using the GP5 limitations. This is critical for equipment which significantly outperforms the GP5 requirements. LMM has not found a good means to present these minor source PTE calculations within the current GP5 forms, but does use traditionally acceptable means to estimate these emissions, including manufacturers' guarantees.

- b. CO control efficiency is 89%. Condition 2(a) requires either 93% reduction or 47 ppmvd@15% O2. Do the engines meet this requirement? **Response – A revised manufacturer's performance Warranty is attached showing that the new engines will meet the GP5 requirement.**
2. Changes from previous authorization for further discussion/review (based on my notes that I'll have to double check):
 - a. SSM have reduced from 5 tpy to 1.74 tpy VOC. **Response – SSM emissions were originally calculated assuming 7 blowdowns/engine/week. Operating experience has shown that this number is overly conservative. SSM basis now assumes 2 blowdowns/engine/week which is more representative of operating data with some contingency.**

- b. Tanks from 0.42 tpy to 0.24 tpy. **Response – VOC Tank emission estimates for the existing permit were calculated using E&P Tanks. LMM has found EPA's method for estimating "Volatile Organic Compound Emissions from Refinery Wastewater Systems" to be more applicable. LMM also changed methodologies in this application to be consistent with other applications they have recently submitted.**

The facility-wide PTE appears to be well below any major source thresholds and should be eligible for GP-5. However there has been public interest in this application and at the facility in the past. Mark Gorog and I stopped by the site on 7/19/2013 and surveyed the perimeter (we did not enter as we did not have the appropriate PPE). We spoke briefly with Andrew McClain of Williams who was onsite. It's our understanding the previously installed engines are rentals which will be replaced with units that are owned by LMM/Williams that are currently being stored at the Clyde Station. **Correct** The dehydrator VOC emissions are below 10 tpy so not subject to the control requirements of GP-5. However since the PTE is approaching the threshold and based on previous complaints and public interest, has voluntary control been considered? **Response – The GlyCalc VOC emission estimate for the dehydrator changed from 9.5 tpy to 9.75 tpy due to the use of a more recent (2013) extended gas analysis. The application and permit estimate of 9.95 tpy of VOC uses the GlyCalc estimate and a contingency staying below 10 tpy. The dehydrator is existing and its operation, with the exception of the gas analysis, has not changed and is within the limitations of the existing permit. The application is only for replacing two existing engines which will result in a significant reduction of VOC and NOx emissions.**

We did notice slight odors around the perimeter of the facility during our visit and visible emissions (although mostly water vapor). Also, there were tank(s) and a column adjacent to Springhill with Williams markings, should these be considered in the PTE? **Response - The equipment down the hill is inlet filters with produced water removal for both the legacy and expansion sections of the station. The produced water tank is included in the permit application.**

Recently odor sampling was performed near the station with split samples taken by LMM and PADEP. No relevant compounds were identified.

Joseph McCay

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If you have received this message in error, please reply to advise the sender of the error and then immediately delete this message.

From: Sandy, Alexander [<mailto:asandy@pa.gov>]
Sent: Friday, September 06, 2013 5:07 PM
To: McCay, Joe
Cc: Baker, Dick
Subject: RE: Springhill, Beagle, Herminie

As a follow up, my review of Springhill isn't as comprehensive at this point but I did note the following:

3. It's my understanding the relocated engines will be subject to the requirements of Section 2 Condition 2(a):
 - a. Engine PTE should be calculated at the applicable emission standard of Condition 2(a) not the vender guarantee since it is the enforceable rate. For example HCHO was calculated at 0.03 g/bhp-hr rather than 0.05 g/bhp-hr.
 - b. CO control efficiency is 89%. Condition 2(a) requires either 93% reduction or 47 ppmvd@15% O2. Do the engines meet this requirement?
4. Changes from previous authorization for further discussion/review (based on my notes that I'll have to double check):
 - a. SSM have reduced from 5 tpy to 1.74 tpy VOC
 - b. Tanks from 0.42 tpy to 0.24 tpy VOC

The facility-wide PTE appears to be well below any major source thresholds and should be eligible for GP-5. However there has been public interest in this application and at the facility in the past. Mark Gorog and I stopped by the site on 7/19/2013 and surveyed the perimeter (we did not enter as we did not have the appropriate PPE). We spoke briefly with Andrew McClain of Williams who was onsite. It's our understanding the previously installed engines are rentals which will be replaced with units that are owned by LMM/Williams that are currently being stored at the Clyde Station. The dehydrator VOC emissions are below 10 tpy so not subject to the control requirements of GP-5. However since the PTE is approaching the threshold and based on previous complaints and public interest, has voluntary control been considered?

We did notice slight odors around the perimeter of the facility during our visit and visible emissions (although mostly water vapor). Also, there were tank(s) and a column adjacent to Springhill with Williams markings, should these be considered in the PTE?

I will be in contact shortly with either yourself or Dick Baker regarding the above or any other questions/concerns. If there are any comments before then, please let me know.

Alex

From: McCay, Joe [<mailto:Joe.McCay@Williams.com>]
Sent: Friday, September 06, 2013 4:09 PM
To: Sandy, Alexander
Subject: RE: Springhill, Beagle, Herminie

Alex,

Thanks. I will get back to you next week.

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