
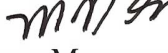



COMMONWEALTH OF PENNSYLVANIA
Department of Environmental Protection
Southwest Regional Office

MEMO

TO Air Quality Permit File GP5-26-00587B/C

FROM Alexander Sandy 
Air Quality Engineering Specialist
Air Quality Program

THROUGH Mark R. Gorog, P.E. 
Environmental Engineer Manager
Air Quality Program


Mark A. Wayner, P.E.
Regional Manager
Air Quality Program

DATE April 7, 2014

RE General Permit Clarification
Laurel Mountain Midstream Operating, LLC
Springhill #2 Compressor Station
Springhill Township, Fayette County

Background

On December 23, 2013, the Department authorized the use of GP-5 to allow the replacement of the two existing natural gas-fired compressor engines at the above listed facility and continued operation of the existing dehydrator and tanks. On April 4, 2014, LMM notified the Department that the proposed engine replacement will likely no longer occur and requested permitting clarification for the facility.

GP5-26-00587B remains active in eFACTS for the existing engines, dehydrator, and tanks and expires on January 9, 2017. LMM is also authorized to replace the existing engines for a period of 18-months from December 23, 2013, under "C." This period may be extended in accordance with GP-5 Section A Condition 12 upon satisfactorily showing that an extension is justified. "B" has been labeled as inactive in the Department's Microsoft Access permit database, but again, is still active in eFACTS.

- The facility is authorized under GP5-26-00587B for the existing engines, dehydrator, and tanks which expires on January 9, 2017.
- GP5-26-00587B will be relabeled as "Active" in Access.
- LMM is authorized to replace the engines under GP5-26-00587C for a period of 18-months from December 23, 2013.

- Upon installation of the proposed engines under GP5-26-00587C, the entire facility will be covered under “C” and “B” will be inactivated in eFACTS.
- Upon commencement of operation under “C” LMM will be required to meet the revised GP-5 requirements including requirements for equipment leaks, annual operating permit fee, etc.
- If LMM confirms with their operations staff that the engine replacement will not occur, LMM will notify the Department and “C” will be inactivated.

Sandy, Alexander

From: Baker, Dick <Richard.Baker@Williams.com>
Sent: Friday, April 04, 2014 2:05 PM
To: Sandy, Alexander
Subject: Springhill Permits

Alex,

In summary, per our discussion on the Springhill Compressor Station, on 3/31/2014:

Two Springhill permits are currently in 'force': GP5-26-00587B (issued 01/09/2012, good through 01/09/2017) and GP5-26-00587C (issued 12/23/2013, good through 12/23/2018).

The facility is currently authorized and operating under "B" and therefore must meet the "old" GP-5 requirements.

The permittee (Williams) has 18 months from 12/23/2013 to install the new engines (unless extended). If the new engines are installed "B" will be inactivated and the entire facility will be authorized under "C" and all "new" GP-5 requirements become effective. At that time, the permittee would be required to begin monthly facility-wide AVO inspections (the initial inspection doesn't appear to be specified but per your interpretation would be upon commencement of operation of the new engines), leak detection, etc.

- The construction of the new engines in "C" must take place in 18 months, or the permit may be revoked. This period may be extended by the request of the permittee, and the permission of PADEP.
- The permittee should inform PADEP if it does not intend to install the 2 new engines.
- Periodic Monitoring would only be required on the new engines, not the old engines.
- FLIR Monitoring begins 180 days after the startup of either of the new engines.
- AVO would be required starting with the start-up of the first 'new' engine.

Thanks for your help in working through this. If any of the above is inaccurate, please let me know.

Thanks,

Dick Baker
Senior Environmental Specialist
Williams Field Services
phone 412-787-4296
cell 412-328-6347

"Operational Excellence "