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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-1523G
Plant ID No.: 051-00025
Applicant: Columbia Gas Transmission, LLC (Columbia)
Facility Name: Majorsville Compressor Station
Location: Dallas, Marshall County
NAICS Code: 486210 (Pipeline Transportation of Natural Gas)
Application Type: Modification
Received Date: December 3, 2012
Engineer Assigned: Jerry Williams, P.E.
Fee Amount: \$2,000.00
Date Received: December 3, 2012
Complete Date: December 28, 2012
Due Date: March 28, 2013
Applicant Ad Date: December 5, 2012
Newspaper: *Moundsville Daily Echo*
UTM's: Easting: 540.9 km Northing: 4,423.6 km Zone: 17
Description: Proposal to replace engines at the facility and make the temporary engine permitted under R13-3003T permanent.

DESCRIPTION OF PROCESS

The following process description was taken from Permit Application R13-1523G:

This station was a storage and transmission station in the past, but now operates as a gathering station. As a result of a mechanical failure of an engine, Columbia entered into Consent Order CO-R13-E-2012-15 with the DAQ on August 16, 2012 to install and operate a temporary engine. The temporary engine is a 1,340 bhp Caterpillar G3516 TALE (Unit T14202 emission point TE02) which operates in place of the failed engine, a 1,320 bhp Ingersoll-Rand 412KVG1 (Unit 14202 emission point E02). Columbia requested and obtained R13-3003T for the engine.

The original plan was to repair Unit 14202 and return it to service. The unit will now be replaced along with the other three (3) 1,320 bhp Ingersoll-Rand 412KVG1 (Unit 14201, 14203, and 14204). Columbia proposes to keep the 1,340 bhp Caterpillar G3516 TALE (Unit T14202 emission point TE02) and is making it permanent in this application. The new replacement engines are Caterpillar G3606LE with Emit Technologies catalysts. There will be four (4) units installed and they will be identified as 14207 (E07), 14208 (E08), 14209 (E09), and 14210 (E10).

Originally, the plan was that the temporary unit would not operate simultaneously with the older unit 14202. However, since 14202 will not be placed back in service, the proposed replacement for 14202, which is 14208, will be operating with at the same time as the temporary unit.

The Ingersoll-Rands (14201-4) will either be retired in place or removed at the end of this project. Additionally, the Ajax engine (14206), which was part of the storage operation, will be retired in place along with remaining portions of the dehydration system. There are no dehydration operations at this facility.

Emissions for the facility have been revised, taking into account the reduction of emissions from the replacement engines. With the replacement engines in place and the older units shut down permanently, the facility will become a minor source under Title V and also drop below the PSD threshold.

SITE INSPECTION

A site inspection was conducted on January 11, 2011 by Steve Sobutka of the DEP NPRO. The facility was found to be operating in compliance at that time.

Directions as given in the permit application are as follows:

From Wheeling, go I-70 East to exit 11 for Dallas Pike. Keep left at the fork and turn right onto Dallas Pike and go 1.7 miles. Take a slight left onto Old Co. 39 and go 0.4 miles. Continue onto Dallas Pike for 3.0 miles and turn right onto Number 2 Ridge Road and go 1.4 miles. Turn left onto Warton Hill Road and go 2.6 miles. Turn right onto Calis Majorsville Road and the Majorsville Compressor Station will be on the left in 0.3 miles.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this modification application consist of the combustion emissions from five (5) natural gas fired compressor engines (E07 – E10, TE02), and fugitive emissions (FUG). The following table indicates which methodology was used in the emissions determination:

Emission Point ID#	Process Equipment	Calculation Methodology
E07 – E10	1,775 hp Caterpillar G3606 LE Compressor Engines w/ Oxidation Catalyst	Manufacturer’s Data, EPA AP-42 Emission Factors
TE02	1,340 hp Caterpillar G3516 TALE Compressor Engine	Manufacturer’s Data, EPA AP-42 Emission Factors

The following table indicates the control device efficiencies that are required for this facility:

Emission Unit	Pollutant	Control Device	Control Efficiency
1,775 hp Caterpillar G3606 LE Compressor Engines w/ Emit Catalyst (E07-E10)	Carbon Monoxide	Oxidation Catalyst	93 %
	Volatile Organic Compounds		50 %
	Formaldehyde		76 %

Maximum controlled point source emissions were calculated by Columbia and checked for accuracy by the writer and are summarized in the table below.

Emission Point ID#	Source	Pollutant	Maximum Hourly Emissions (lb/hr)	Maximum Annual Emissions (tpy)
E07 -- E10 each	1,775 hp Caterpillar G3606LE Compressor Engines	Nitrogen Oxides	1.95	8.54
		Carbon Monoxide	0.75	3.29
		Particulate Matter-10	0.14	0.62
		Sulfur Dioxide	0.01	0.05
		Volatile Organic Compounds	1.25	5.48
		Formaldehyde	0.24	1.05
		Total HAPs	0.57	2.48

		Carbon Dioxide Equivalent	6,259	27,413
TE02	1,340 hp Caterpillar G3516 TALE Compressor Engine	Nitrogen Oxides	4.43	19.40
		Carbon Monoxide	6.46	28.29
		Particulate Matter-10	0.12	0.53
		Sulfur Dioxide	0.01	0.05
		Volatile Organic Compounds	0.83	3.64
		Formaldehyde	0.50	3.50
		Total HAPs	0.12	0.53
		Carbon Dioxide Equivalent	1,320	5,783

The following table indicates the existing potential to emit (PTE), emissions reduction for equipment removed, emissions increase for the new equipment, and the net change in PTE in tons/year (tpy):

Pollutant	Current Facility PTE (tpy)	Emissions Reduction from Equipment Removal (tpy)	Emissions Increase from New Equipment (tpy)	Net Change in PTE (tpy)
Carbon Monoxide	68.13	22.21	41.45	19.24
Nitrogen Oxides	1,299.51	1,271.59	53.56	-1,218.03
Particulate Matter-10	29.64	29.49	3.01	-26.48
Sulfur Dioxide	0.17	0.14	0.25	0.11
Volatile Organic Compounds	15.70	14.34	25.56	11.22
Carbon Dioxide Equivalent	34,400	31,482	33,195	1,713
Total HAPs	16.84	16.49	10.71	-5.78

The following table indicates Columbia’s new potential to emit (PTE). These emissions are associated with the existing equipment, proposed engines and making the temporary engine permanent:

Pollutant	Maximum Annual Emissions (tpy)
Carbon Monoxide	87.37
Nitrogen Oxides	81.48
Particulate Matter-10	3.16
Sulfur Dioxide	0.28
Volatile Organic Compounds	26.92
Carbon Dioxide Equivalent	36,113
Total HAPs	11.04

REGULATORY APPLICABILITY

Unless otherwise stated WVDEP DAQ did not determine whether the permittee is subject to an area source air toxics standard requiring Generally Achievable Control Technology (GACT) promulgated after January 1, 2007 pursuant to 40 CFR 63, including the area source air toxics provisions of 40 CFR 63, Subpart ZZZZ.

The following rules apply to the facility:

45CSR13 (Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation)

45CSR13 applies to this source due to the fact that Columbia exceeds the regulatory emission threshold for criteria pollutants of 6 lb/hr and 10 ton/year, and they are also subject to a substantive requirement of an emission control rule promulgated by the Secretary (40CFR60 Subparts JJJJ and OOOO).

Columbia paid the appropriate application fee and published the required legal advertisement for a construction permit application.

45CSR16 (Standards of Performance for New Stationary Sources Pursuant to 40 CFR Part 60)

45CSR16 applies to this source by reference of 40CFR60, Subparts JJJJ and OOOO. These requirements are discussed under that rule below.

45CSR22 (Air Quality Management Fee Program)

As a result of the granting of this permit, Columbia is not subject to 45CSR30. The Majorsville Compressor Station is subject to 40CFR60 Subparts JJJJ and OOOO, however they are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided they are not required to obtain a permit for a reason other than their status as an area source.

Emissions for the facility have been revised, taking into account the reduction of emissions from the replacement engines. With the replacement engines in place and the older units shut down permanently, the facility will become a minor source under Title V and also drop below the PSD threshold.

Columbia is required to pay the appropriate annual fees and keep their Certificate to Operate current. Columbia must submit the appropriate documentation to the Title V Section to make their Title V Permit inactive.

40CFR60 Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI ICE))

40CFR60 Subpart JJJJ is applicable to owners and operators of new stationary spark ignition internal combustion engines manufactured after July 1, 2007, for engines with a maximum rated power capacity greater than 500 hp.

The proposed 1,775 hp Caterpillar G3606LE compressor engines (E07-E10) will be subject to the following emission limits: NO_x – 1.0 g/hp-hr (3.92 lb/hr); CO – 2.0 g/hp-hr (7.83 lb/hr); and VOC – 0.7 g/hp-hr (2.74 lb/hr). Based on the manufacturer's specifications for these engines, the emission standards will be met.

The proposed 1,340 hp Caterpillar G3516 TALE compressor engine (TE02) will be subject to the following emission limits: NO_x – 2.0 g/hp-hr (5.90 lb/hr); CO – 4.0 g/hp-hr (11.81 lb/hr); and VOC – 0.7 g/hp-hr (2.95 lb/hr). Based on the manufacturer's specifications for these engines, the emission standards will be met.

In addition, the proposed engines are not certified by the manufacturer to meet the emission standards listed in 40CFR60 Subpart JJJJ. Therefore, Columbia will be required to conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or three (3) years, whichever comes first, to demonstrate compliance.

40CFR60 Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution)

EPA published in the Federal Register new source performance standards (NSPS) and air toxics rules for the oil and gas sector on August 16, 2012. 40CFR60 Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO₂) emissions from affected facilities that commence construction, modification or reconstruction after August 23, 2011. The

following affected sources which commence construction, modification or reconstruction after August 23, 2011 are subject to the applicable provisions of this subpart:

- a. Each gas well affected facility, which is a single natural gas well.

There are no gas wells at this facility. Therefore, all requirements regarding gas well affected facilities under 40 CFR 60 Subpart OOOO would not apply.

- b. Each centrifugal compressor affected facility, which is a single centrifugal compressor using wet seals that is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your centrifugal compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A centrifugal compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

There are no centrifugal compressors at the Majorsville Compressor Station. Therefore, all requirements regarding centrifugal compressors under 40 CFR 60 Subpart OOOO would not apply.

- c. Each reciprocating compressor affected facility, which is a single reciprocating compressor located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment. For the purposes of this subpart, your reciprocating compressor is considered to have commenced construction on the date the compressor is installed (excluding relocation) at the facility. A reciprocating compressor located at a well site, or an adjacent well site and servicing more than one well site, is not an affected facility under this subpart.

There are reciprocating internal combustion engines located at the Majorsville Compressor Station that were constructed after August 23, 2011. Therefore, the requirements regarding reciprocating compressors under 40 CFR 60 Subpart OOOO would apply. Columbia would be required to perform the following:

- Replace the reciprocating compressor rod packing at least every 26,000 hours of operation or 36 months.
- Demonstrate initial compliance by continuously monitoring the number of hours of operation or track the number of months since the last rod packing replacement.
- Submit the appropriate start up notifications.
- Submit the initial annual report for the reciprocating compressors.
- Maintain records of hours of operation since last rod packing replacement, records of the date and time of each rod packing replacement, and records

of deviations in cases where the reciprocating compressor was not operated in compliance.

d. Pneumatic Controllers

- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller operating at a natural gas bleed rate greater than 6 scfh which commenced construction after August 23, 2011, and is located between the wellhead and the point of custody transfer to the natural gas transmission and storage segment and not located at a natural gas processing plant.
- Each pneumatic controller affected facility, which is a single continuous bleed natural gas-driven pneumatic controller which commenced construction after August 23, 2011, and is located at a natural gas processing plant.

There are no applicable pneumatic controllers which commenced construction after August 23, 2011. Therefore, all requirements regarding pneumatic controllers under 40 CFR 60 Subpart OOOO would not apply.

e. Each storage vessel affected facility, which is a single storage vessel, located in the oil and natural gas production segment, natural gas processing segment or natural gas transmission and storage segment.

40CFR60 Subpart OOOO defines a storage vessel as a unit that is constructed primarily of nonearthen materials (such as wood, concrete, steel, fiberglass, or plastic) which provides structural support and is designed to contain an accumulation of liquids or other materials. The following are not considered storage vessels:

- Vessels that are skid-mounted or permanently attached to something that is mobile (such as trucks, railcars, barges or ships), and are intended to be located at a site for less than 180 consecutive days. If the source does not keep or are not able to produce records, as required by §60.5420(c)(5)(iv), showing that the vessel has been located at a site for less than 180 consecutive days, the vessel described herein is considered to be a storage vessel since the original vessel was first located at the site.
- Process vessels such as surge control vessels, bottoms receivers or knockout vessels.
- Pressure vessels designed to operate in excess of 204.9 kilopascals and without emissions to the atmosphere.

This rule requires that the permittee determine the VOC emission rate for each storage vessel affected facility utilizing a generally accepted model or calculation methodology within 30 days of startup, and minimize emissions to the extent

practicable during the 30 day period using good engineering practices. For each storage vessel affected facility that emits more than 6 tpy of VOC, the permittee must reduce VOC emissions by 95% or greater within 60 days of startup. The compliance date for applicable storage vessels is October 15, 2013.

The storage vessels located at the Majorsville Compressor Station were installed prior to August 23, 2011 and have the potential to emit to less than 6 tpy of VOC. Therefore, Columbia is not required by this section to reduce VOC emissions by 95%.

- f. The group of all equipment, except compressors, within a process unit is an affected facility.
- Addition or replacement of equipment for the purpose of process improvement that is accomplished without a capital expenditure shall not by itself be considered a modification under this subpart.
 - Equipment associated with a compressor station, dehydration unit, sweetening unit, underground storage vessel, field gas gathering system, or liquefied natural gas unit is covered by §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart if it is located at an onshore natural gas processing plant. Equipment not located at the onshore natural gas processing plant site is exempt from the provisions of §§60.5400, 60.5401, 60.5402, 60.5421 and 60.5422 of this subpart.
 - The equipment within a process unit of an affected facility located at onshore natural gas processing plants and described in paragraph (f) of this section are exempt from this subpart if they are subject to and controlled according to subparts VVa, GGG or GGGa of this part.

The Majorsville Compressor Station is not a natural gas processing plant. Therefore, Leak Detection and Repair (LDAR) requirements for onshore natural gas processing plants would not apply.

- g. Sweetening units located at onshore natural gas processing plants that process natural gas produced from either onshore or offshore wells.
- Each sweetening unit that processes natural gas is an affected facility; and
 - Each sweetening unit that processes natural gas followed by a sulfur recovery unit is an affected facility.
 - Facilities that have a design capacity less than 2 long tons per day (LT/D) of hydrogen sulfide (H₂S) in the acid gas (expressed as sulfur) are required to comply with recordkeeping and reporting requirements specified in §60.5423(c) but are not required to comply with §§60.5405 through 60.5407 and paragraphs 60.5410(g) and 60.5415(g) of this subpart.

- Sweetening facilities producing acid gas that is completely reinjected into oil-or-gas-bearing geologic strata or that is otherwise not released to the atmosphere are not subject to §§60.5405 through 60.5407, 60.5410(g), 60.5415(g), and 60.5423 of this subpart.

There are no sweetening units at the Majorsville Compressor Station. Therefore, all requirements regarding sweetening units under 40 CFR 60 Subpart OOOO would not apply.

The following rules do not apply to the facility:

45CSR30 (Requirements for Operating Permits)

Columbia is not subject to 45CSR30. The Majorsville Compressor Station is subject to 40CFR60 Subparts JJJJ and OOOO, however they are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided they are not required to obtain a permit for a reason other than their status as an area source.

40CFR60 Subpart KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants)

40CFR60 Subpart KKK applies to onshore natural gas processing plants that commenced construction after January 20, 1984, and on or Before August 23, 2011. The Majorsville Compressor Station is not a natural gas processing facility, therefore, Columbia is not subject to this rule.

45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants)

PSD Applicability Determination

The Majorsville Compressor Station is an existing Major Stationary Source with respect to PSD because they have actual emissions of nitrogen oxides in excess of 250 tons per year. The Majorsville Compressor Station is not one of the listed 28 major stationary sources whose emissions threshold is 100 tpy as defined in 40CFR52.21(b)(1)(i) and 45CSR14 Section 2.43. In order for a project to become subject to PSD review, the major stationary source must have a significant emissions increase from the project **and** a significant net emissions increase as calculated over the 5 year contemporaneous period. The first step is to determine if the proposed project results in a significant emissions increase utilizing the calculation procedures in 45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources for the Prevention of Significant Deterioration of Air Quality) Section 3.4. The procedure for calculating whether a significant emissions increase will occur depends on the type of emissions units being modified. The procedure for calculating whether a significant net emissions increase will occur at the major stationary source, which is the second step in the process, is contained in 45CSR14 Section 2.46. Regardless of any such preconstruction projections, a major modification results if the project causes a significant emissions increase and a significant net emissions increase.

In determining whether a significant emissions increase occurs, 45CSR14 provides two (2) ways to make that determination. These calculations are based on whether or not it is an existing emissions unit or a new emissions unit.

45CSR14 Section 2.27 defines an 'emissions unit' as any part of a stationary source that emits or would have the potential to emit any regulated NSR pollutant and includes an electric utility steam generating unit as defined in subsection 2.25. For the purposes of this rule, there are two types of emissions units as described in subdivisions 2.27.a and 2.27.b.

2.27.a. A new emissions unit is any emissions unit that is (or will be) newly constructed and that has existed for less than 2 years from the date such emissions unit first operated.

2.27.b. An existing emissions unit is any emissions unit that does not meet the requirements in subdivision 2.27.a. A replacement unit, as defined in subsection 2.68, is an existing emissions unit.

Because Majorsville Compressor Station is an existing source they will fall under 2.27.b.

Therefore, since emissions units at Majorsville Compressor Station would be considered new units, 45CSR14 Section 3.4.d states that an Actual-to-Potential test would be utilized. A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the potential to emit (as defined in subsection 2.58) and the baseline actual emissions (as defined in subdivisions 2.8.a and 2.8.b), for each existing emissions unit, equals or exceeds the significant amount of that pollutant (as defined in subsection 2.74).

The first step is to determine whether or not the proposed project results in a significant emissions increase utilizing the Actual-to-Potential test. The result of that test will be compared to PSD Significant Emission Rates (SER) to determine PSD applicability. If the resultant emissions are below the PSD SER then the project is not subject to PSD review. If the project's emissions are greater than the PSD SER then all contemporaneous increases and decreases must be examined to determine if the project is subject to PSD Review.

The potential to emit from the emissions units associated with this project were based on the proposed engines and making the temporary engine permanent.

The following table indicates what Majorsville Compressor Station's potential emissions increase would be from the installation of the compressor engines:

Pollutant	Emissions increase associated with this modification (tpy)	PSD SER (tpy)	Subject to PSD Review (Y or N)
NO _x	53.56	40	Y
CO	41.45	100	N
SO ₂	0.25	40	N
PM ₁₀	3.01	15	N
VOC	25.56	100	N
GHG	33,196	75,000	N

As shown in the table above, nitrogen oxides exceeds the SER's. Therefore, it must be determined whether or not a significant net emissions increase as calculated over the 5 year contemporaneous period.

Net Emissions Increase

Because the nitrogen oxides emissions exceeded the SER, a PSD netting analysis must be performed. This significant net emissions increase must be calculated over a 5 year contemporaneous period. There have been no contemporaneous additions over the past 5 years. However, during the review of the contemporaneous reductions during the two year netting timeframe of September 2010 through August 2012 there was a reduction of 135.75 tpy of NO_x due to the shutdown of Engine 14202. This would result in a net decrease of 82.19 tpy of nitrogen oxides (53.56-135.75).

Final Conclusion

Because there was not a significant net emissions increase as calculated over the 5 year contemporaneous period, PSD review is not required.

45CSR19 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment)

The Majorsville Compressor Station is located in Marshall County, which is a non-attainment county for PM_{2.5}. PM_{2.5} is also known as a precursor for Sulfur Dioxide and Nitrogen Oxides, therefore the Majorsville Compressor Station is potentially applicable to 45CSR19.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

There will be small amounts of various non-criteria regulated pollutants emitted from the combustion of natural gas. However, due to the concentrations emitted, detailed toxicological information is not included in this evaluation.

AIR QUALITY IMPACT ANALYSIS

Modeling was not required of this source due to the fact that the facility is not subject to 45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants) as seen in the table listed in the Regulatory Discussion Section.

SOURCE AGGREGATION

“Building, structure, facility, or installation” is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person.

The Majorsville Compressor Station is located in Marshall County and will be operated by Columbia.

1. The Majorsville Compressor Station will operate under SIC code 4922 (Pipeline Transportation of Natural Gas). There are surrounding compressor stations operated by Columbia that share the same two-digit major SIC code of 49 for natural gas transmission. However, Columbia does not own or operate any gas wells. Therefore, the Majorsville Compressor Station does share the same SIC code as the surrounding compressor stations.
2. “Contiguous or Adjacent” determinations are made on a case by case basis. These determinations are proximity based, and it is important to focus on this and whether or not it meets the common sense notion of a plant. The terms “contiguous” or “adjacent” are not defined by USEPA. Contiguous has a dictionary definition of being in actual contact; touching along a boundary or at a point. Adjacent has a dictionary definition of not distant; nearby; having a common endpoint or border.

There are no Columbia properties in question that are considered to be on contiguous or adjacent property with the Majorsville Compressor Station.

3. The proposed Majorsville Compressor Station is not under common control with the nearby MarkWest facility.

Because the facilities are not considered to be on contiguous or adjacent properties and not under common control, the emissions from the Majorsville Compressor Station should not be aggregated with other facilities in determining major source or PSD status.

MONITORING OF OPERATIONS

Columbia will be required to perform the following monitoring:

1. Monitor and record quantity of natural gas consumed for all engines.
2. Monitor all applicable requirements of 40CFR60 Subparts JJJJ and OOOO.

Columbia will be required to perform the following recordkeeping:

1. Maintain records of the amount of natural gas consumed and hours of operation for all engines.
2. Maintain records of testing conducted in accordance with the permit. Said records shall be maintained on-site or in a readily accessible off-site location
3. Maintain the corresponding records specified by the on-going monitoring requirements of and testing requirements of the permit.
4. Maintain a record of all potential to emit (PTE) HAP calculations for the entire facility. These records shall include the natural gas compressor engines and ancillary equipment.
5. Maintain records of all applicable requirements of 40CFR60 Subparts JJJJ and OOOO.
6. The records shall be maintained on site or in a readily available off-site location maintained by Columbia for a period of five (5) years.

CHANGES TO PERMIT R13-1523F

Replacement of grandfathered engines at the facility and make the temporary engine permitted under R13-3003T permanent. Additionally, fugitive emissions will increase as the number of components will also increase. These changes result in this facility becoming a minor source not subject to 45CSR30.

In addition, Section 7 of the permit was added to address the reciprocating engines that are subject to 40CFR60 Subpart OOOO. This section contains all applicable language for this equipment.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that Columbia meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Marshall County location should be granted a 45CSR13 modification permit for their facility.

Jerry Williams, P.E.
Engineer

Date