



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Phone: 304/926-0475 • Fax: 304/926-0479

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

Evaluation Memo

Application Number: R13-2963A
Facility ID Number: 033-00014
Name of Applicant: Dominion Transmission, Inc.
Name of Facility: Law Compressor Station
Application Type: Class 1 Administrative Update
Submission Date: November 18, 2015
Applicant Ad Date: Not Applicable
Applicant Ad Newspaper: Not Applicable
Complete Date: November 18, 2015
Due Date: **January 17, 2016**
Engineer: Joe Kessler

Background

The Law Compressor Station is an existing natural gas compressor station used to compress natural gas for Dominion Transmission, Inc.'s (DTI) transmission pipeline system in West Virginia. The facility is located in Good Hope, Harrison County, WV and is used to gather gas from area gas wells and, after drying, convey the gas to the Hastings Extraction Plant. The facility, with the exception of the 9.0 mmscf/day glycol dehydration unit (GDU) permitted under R13-2963, is considered grandfathered under 45CSR13. The facility-wide NO_x emissions are above 250 TPY (according to the 2016 Title V Renewal Application) and, therefore, the facility is considered a major source under Title V and New Source Review (NSR).

Proposed Administrative Update

On April 3, 2013, DTI was issued Permit Number R13-2963 for the installation of a 9.0 mmscf/day glycol dehydration unit. Included in the permit was language for LDAR requirements relating to 45 CFR 60, Subpart OOOO ("Standards of Performance for Crude Oil and Natural Gas

Production, Transmission and Distribution’). DTI has now requested a Class I Administrative Update to remove this language from the permit as the facility is not defined as a “natural gas processing plant.”

Pursuant to §60.5365(f)(2), all “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.”

Pursuant to §60.5430, a “natural gas processing plant” is a facility “engaged in the extraction of natural gas liquids from field gas, fractionation of mixed natural gas liquids to natural gas products, or both. A Joule-Thompson valve, a dew point depression valve, or an isolated or standalone Joule-Thompson skid is not a natural gas processing plant.” The Law Compressor Station does not meet this definition and, therefore, Subpart OOOO LDAR language does not apply.

Conclusion

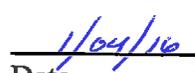
The writer is in agreement that the Subpart OOOO language was incorrectly included in R13-2963 and should now be removed and that it is appropriate to remove it under a Class I Administrative Update process. Therefore all references to Subpart OOOO have been removed from the document.

Recommendation

The information provided in permit application R13-2963A indicates that compliance with all applicable federal and state air quality regulations will be achieved. Therefore, I recommend to the Director the issuance of the Class 1 Administrative Update R13-2963A to Dominion Transmission, Inc. for the changes outlined above at the Law Compressor Station.



Joe Kessler, PE
Engineer



Date