



west virginia department of environmental protection

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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.: R13-2479C
Plant ID No.: 043-00002
Applicant: Columbia Gas Transmission, LLC
Facility Name: Hubbal Compressor Station
Location: Hubball, Lincoln County
NAICS Code: 48621
Application Type: Class II Administrative Update
Received Date: November 21, 2014
Engineer Assigned: Laura Jennings
Fee Amount: \$300.00
Date Received: November 24, 2014
Complete Date: December 1, 2014
Due Date: January 30, 2015
Applicant Ad Date: November 19, 2014
Newspaper: *The Lincoln Journal*
UTM's: Easting: 4,228.7 km Northing: 365.9 km Zone: 17
Description: There are no changes to operations at the facility. This administrative update application is to allow for demonstration of sulfur compliance via tariff limits rather than gas sampling, which is in alignment with section 23 of the Title V permit R30-043-00002.

DESCRIPTION OF PROCESS

Columbia Gas Transmission requests a Class II Administrative Amendment to align the Regulation 13 permit requirements with those of the Regulation 30 permit. This request is being made to allow for the demonstration of compliance with the sulfur limit by means of the tariff, rather than sampling.

SITE INSPECTION

A site inspection is not required because this is an existing facility.

ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

There are no changes to emissions as a result of this Class II Administrative update. The requested changes are entirely administrative in nature.

REGULATORY APPLICABILITY

Applicable regulations pertaining to this Class II Administrative Update:

45CSR13 PERMITS FOR CONSTRUCTION, MODIFICATION, RELOCATION AND OPERATION OF STATIONARY SOURCES OF AIR POLLUTANTS, NOTIFICATION REQUIREMENTS, ADMINISTRATIVE UPDATES, TEMPORARY PERMITS, GENERAL PERMITS, PERMISSION TO COMMENCE CONSTRUCTION, AND PROCEDURES FOR EVALUATION

The application meets the definition of a Class II administrative update as described in 45CSR13 § 4.2.b. The applicant has met the requirements by submitting the \$300 fee and providing 30 day notice to the public in *The Lincoln Journal*.

45CSR30 REQUIREMENTS FOR OPERATING PERMITS

The facility is an existing Title V major source for criteria pollutants and is currently operating under permit R30-04300002-2012.

Regulations that are not applicable pertaining to this Class II Administrative Update:

45CSR10 TO PREVENT AND CONTROL AIR POLLUTION FROM THE EMISSION OF SULFUR OXIDES

A permit shield was granted in accordance with 45CSR§30-5.6 that specifically identified 45CSR10 as not applicable to the source and is provided in Section 23.2 of the facility's Title V operating permit on the basis that the facility's dehydrator reboiler is less than 10 MMBtu/hr and 45CSR10 is not applicable to natural gas fired engines.

40 CFR 60, NSPS FOR STATIONARY GAS TURBINES
SUBPART GG

There are no stationary gas turbines at the facility; therefore the source is not subject to the requirements to this subpart, only the definition for natural gas provided in this subpart as it applies to allowance of the tariff to demonstrate compliance with the SO₂ emission limits.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

There are no new hazardous air pollutants associated with this Class II Administrative Update application.

AIR QUALITY IMPACT ANALYSIS

The changes associated with this Class II Administrative Update application do not involve any change in operation. The requested changes do not meet the definition of a major modification according to 45CSR14 or 45CSR19 and therefore, no modeling is required.

MONITORING OF OPERATIONS

According to the engineering evaluation associated with R13-2479 and written by Natalya Chertkovsky, the SO₂ emission rates were based on the FERC (Federal Energy Regulatory Commission) limits. The requested change to insert 4.3.2.1 is to allow the use of the tariff to demonstrate compliance. Tariff requirements are regulated by FERC; therefore, the writer agrees with the requested change to the monitoring requirement.

CHANGES TO PERMIT R13-2479B

- General permit changes to address the current permit revision, and current administration officials.
- Updated the US EPA address for correspondence in section 3.6.3.
- Inserted requirement 4.3.2.1 as requested in the application.
- Deleted requirements 4.3.1 because the applicant is not subject to 45CSR10-5.1

RECOMMENDATION TO DIRECTOR

The writer recommends that this Class II Administrative Update permit R13-2479C be granted to Columbia Gas, Hubball Compressor Station located in Hubball, Lincoln County, WV. Based on the information provided in the application, the source should be in compliance with all applicable state and federal regulations associated with this application.



Laura M. Jennings
Permit Engineer
3/9/15

Date

Fact Sheet R13-2479C
Columbia Gas Transmission, LLC
Hubball Compressor Station